GREATER**LONDON**AUTHORITY

[redacted]
(By email)

Our Ref: MGLA050320-4396

2 April 2020

Dear [redacted]

Thank you for your request for information which the Greater London Authority (GLA) received on 5 March 2020. Your request has been dealt with under the Freedom of Information Act (FOI) 2000.

You asked for:

> *The attached screenshot states clearly that I should be able to click a link to a LP policy and download a file of policy comments "linked at the top of the page". I have clicked the link but can find no file of policy comments linked at the top of the page of any policy. Please can you show me how to access comments on LP policies by policy and in pdf form?*

Our response to your request is as follows:

Please note that the screen capture in question relates to a test page of the consultation database and has never been live on the internet – it is an error on the part of consultants that the page was ever searchable through google as the functionality was never completed. This was due to a number of errors in the system and its consequential impact on timings and resources needed to ensure the statutory duties of the developing the Plan were met, meant a decision was taken not to complete the functionality in full.

Now this has been drawn to our attention this page will be removed.

However, as requested a PDFs of the full comments per policy has been provided. Although, it should be noted that because the functionality was not completed in full, due to the reasons described above, all the records may not be there and therefore it cannot necessarily be relied upon to be accurate.

If you have any further questions relating to this matter, please contact me, quoting the reference at the top of this letter.

Yours sincerely

[redacted]
Information Governance Officer

If you are unhappy with the way the GLA has handled your request, you may complain using the GLA's FOI complaints and internal review procedure, available at:

https://www.london.gov.uk/about-us/governance-and-spending/sharing-our-information/freedom-information

Bakerloo Line extension

User: Mr Peter Eversden MBE

Figure 2.4 does not indicate with which other lines the stations that are marked as interchanges will connect. That should be indicated. This applies also to other figures that indicate interchanges.

The London Forum of Amenity and Civic Societies, of which some West London civic and community groups are members, submitted a response to the consultation on the Bakerloo Line extension on behalf of communities like ours in West London and with input from its members. It should be considered at the examination of the Replacement London Plan section on this subject in pages 33 and 34 to assess if it describes the best Underground extension scheme or not.

The submission was as follows:-

Subject: Proposed extension of the Bakerloo line

1. This response is made on behalf of the London Forum of Amenity & Civic Societies.

2. The London Forum supports the extension of the Bakerloo line. It is more efficient to operate tube lines through the central zone than to terminate within it. There is great pressure on existing bus and rail services in the south-east.

3. We retain some misgivings as to the chosen route, but only because others might bring greater benefits to London as a whole. The suspicion persists that the chosen route owes its success to the potential for private sector contribution to its cost. The aspiration to run to Camberwell has been recognised since 1931. With the possible exception of Essex Road, Walworth Road carries more bus passengers than any radial route in London, and should be the prime candidate for a new Metro service. We do not believe that re-opening the station on Thameslink that gave its name to the public highway, welcome though it would be, adequately meets the needs of Walworth Road and Camberwell.

4. One of our member societies believes there is scope for a cut and cover route along an abandoned canal and the former Southern Railway line via Honor Oak Lordship Lane and Upper Sydenham to Crystal Palace. They and we do not have the resources to work up this option, but the potential advantage of reduced construction costs and in particular those associated with new stations, so that more stations might be provided, should not be rejected without due consideration.

5. The Forum does not perceive there to be any London wide issues arising from the siting of two stations along Old Kent Road. We believe that local opinion should determine how these are resolved. We note the campaign for a third station in Old Kent Road, which would be stronger if a cut and cover extension could be developed, and which forms part of the cut-and-cover proposal.

6. The interchange at Lewisham is very much valued, making the line useful to a far wider catchment area. However, we believe there also needs to be much improved access to the Lewisham Shopping Centre (and the rest of central Lewisham) - the current signalled crossing of Rennell St is inadequate, providing only about 15 seconds of green time (insufficient for the less mobile), and too long a wait before turning green (about 1 minute). Instead, access should be by means of a tunnel from the stations through to the Centre. The timings on the existing surface crossing would have to be vastly improved to make them sufficiently pedestrian friendly to attract shoppers to the new line.

User:	Allies and Morrison
We are pleased to see that the Mayor is proposing to extend the Bakerloo Line to increase the capacity and connectivity of the transport network.	

User:	London Wildlife Trust

Old Kent Road OA
In para 2.1.15 we welcome the recognition for “additional public open spaces the area will require as it evolves.”

User: London Wildlife Trust

New Cross/Lewisham/Catford OA
In para 2.1.16-18 there should be reference to the River Ravensbourne corridor that flows between Catford and Lewisham, much of it close to the town centres. Some stretches of this have benefited from enhancements over the past 20 years (e.g. at Ladywell Fields), and we would hope the Plan encourages future development to not only respect and protect the area's riparian assets but also help secure further enhancements to it to help with climate change and flood risk resilience, biodiversity and people's contact with nature.

Central London

User:	Mr Peter Eversden MBE

It will be important that the HS2 construction plans and the planning brief for the area around Euston Station "currently being produced" (paragraph 2.1.67) minimise the loss of existing social housing. That should be covered by policy and could be considered in the examination of the Replacement London Plan.

User:	Levitt Bernstein
Diagram is too busy and requires simplification. Legend also required.	

User:	Mr Christopher Lenon

No Opportunity Area is identified for Chelsea / King’s Road. There is no justification for a Crossrail 2 station on the King’s Road given the criteria for Crossrail 2. The Plan still shows the station despite this and overwhelming opposition in the 2016 Public Consultation.

User: Better Bankside Business Improvement District

Chapter 2: Spatial Development Patterns

London Bridge and Bankside are listed as Opportunity Areas within The London Plan. Better Bankside welcome this designation and feel it is appropriate given that the area is continuously evolving, while maintaining its unique historical character.
While Better Bankside welcome this designation, it is not clear within the plan how the Opportunity Area designation will impact local businesses, residents and the wider community. It is also not clear how the Opportunity Area designation will impact the heritage of the Bankside area, especially around Borough Market and Borough High Street.

Better Bankside would welcome additional information on how the Opportunity Area Planning Framework (OAPF) will ensure joined-up and robust planning processes. The OAPF does not enforce that local Councils take into consideration the overall impacts of development, including development impacts on the road network, pressures on local transport, etc. Often planning processes and development in Opportunity Areas area disjointed and completed in silo from one another.

Better Bankside would welcome additional information on how the identified Opportunity Areas located around London Bridge and Bankside will impact the area. For instance, will development at the Elephant and Castle Opportunity Area put pressure on the already highly congested Bankside road network?
Furthermore, Better Bankside would like information on how the core elements of The London Plan will be realised through the Opportunity Area. For instance, how will the transport objectives be brought forward and funded in the London Bridge and Bankside Opportunity Area?

User:	Canary Wharf Ward

5. Figure 2.11

Isle of Dogs targets 29,000 new homes 110,000 new jobs

Where is the transport capacity to support this jobs growth as even the Elizabeth line and new Thames bridges / crossings wont be adequate?

Conclusion

User:	London Forum of Amenity and Civic Societies
London Forum supports the comments in this section	

User:	London Borough of Camden

Attempts to find new fiscal tools to support the provision of infrastructure are welcomed.

User:	London Borough of Camden

Attempts to find new fiscal tools to support the provision of infrastructure are welcomed.

Crossrail 2

User:	Miss Olga Astaniotis

In order for the aspirations of Crossrail developments at New Southgate to be fully realised, this Plan has to be sufficiently robust and detailed so that Local Authorities are compelled to take the appropriate action. It is particularly important here where the solutions for the North Circular can only be realised if 3 local authorities come together with a joint vision. If all this plan can offer is a vision, then we will not see any progress. The A406 plans have been evaluated, considered, rejected ressurected, etc., since Ken Livingstone's tenure.

User: Mr Christopher Lenon

No Opportunity Area is identified for Chelsea / King’s Road. There is no justification for a Crossrail 2 station on the King’s Road given the criteria for Crossrail 2. The Plan still shows the station despite this and overwhelming opposition in the 2016 Public Consultation and the fact that a station does not meet the criteria set fro Crossrail 2. It is 2 years since the Public Consultation

Why is the "new" route not being made public?

User:	Love Wimbledon BID

Wimbledon OA should be clarified. There are already interchange opportunities between National Rail, trams and underground and as such as the 21st busiest station in the country is currently a major transport hub. Crossrail 2 will allow for significant growth and intensification, with commercial development prioritised to help meet the Mayors ambition to promote growth in employment. However the planning and phasing of this vital infrastructure project must be managed carefully to ensure the heart of the town centre is maintained through the period of construction, otherwise the Opportunity Area will not be realised.
However irrespective of this Wimbledon is currently attracting investment and growth. Businesses are increasing and gorwing and it remain an attractive town ccentre whilst increasing the number of jobs. It therefore has the potential given the PTAL rating, commercial sqm, low vacancy rate and growth potential it should be upgraded to a Metropolitan town centre

User:	Allies and Morrison
We are pleased that the Mayor is continuing to support the Crossrail 2 project to support London’s major growth locations with potential strategic growth locations outside London.	

User: Mr Pete Smith

I wish to express my dismay and wholehearted objection to the proposed creation of a massive Opportunity Area across Kingston that would see 9000 more homes and 5000 new jobs. The current council administration in Kingston has negotiated for this to happen with the GLA behind closed doors over the last 3 years, WITH NO PUBLIC CONSULTATION, and rushed it through as part of the Direction of Travel growth strategy with it now coming in to The London Plan.

This massive growth target is against a formal definition of an Opportunity Area as a place that would allow for 2500 new homes and 5000 new jobs. What we are facing is huge, will be high rise and will change completely the character of the Borough. There is also no guarantee that we will get CrossRail 2 in 2033, or indeed at any time. Development is just starting on the high rise blocks on The Old Post Office Site and Eden Walk (1000 homes just in town centre) and a huge, dense, high rise development is being proposed in Canbury Ward by CNM Estates (which has been put temporarily on hold because of resident opposition). There are other similar developments already complete or almost complete (e.g. Sury Basin/Old Gasholder site).

It seems this huge growth is fixated on simply building more dwellings, with absolutely no thought whatsoever as to the end result - having lived in the borough for 21 years I can say for certain that there is not a sufficient amount of tolerance in the available space to allow for the infrastructure to be put in place to support such an enormous amount of new dwellings.

Claiming that any of these proposed new dwellings will be 'affordable' is an absolute joke. There is no incentive on the part of the property developer to build anything other than 'luxury' or similar, which can be marketed abroad to wealthy buyers. None of the existing large developments in Kingston (permitted, started, partially or wholly completed) offer anything like the amount of GENUINELY affordable housing they should be. They simply offer a cash alternative and the problem is kicked into the long grass. I see no reason for any developer to offer anything different under the Draft London Plan - there is not sufficient legal constraint. All authorities that should have powers to control this seem impotent, unwilling, or, most usually, in thrall to the money and power and influence which the property developers dangle over their heads.

The nature of Kingston is defined by it's proximity to Royal Parks parkland, and Thames river frontage. These are already facing DIRE over-subscription from the existing local poplulation - contention of usage in e.g. Richmond Park especially at weekends is already at near CRISIS point, with numbers of cyclists and pedestrians and motorists all wanting access at the same time... there is no straightforward easy solution to this.

Stacking ~20000 people (approx 2 or 3 persons per new dwelling) on top of these contented spaces and ramping up demand on creaking infrastructure will do nothing other than bring the borough to a standstill and create a hideous urban jungle with associated social problems.

The Draft London Plan also proposes allowing people to sell off their homes for development if they live within 800 metres of a station as well as some other criteria. Developers can then build properties that are several storeys high in their place. This criteria means that nearly all of Kingston Borough can be redeveloped piecemeal as there are no restrictions on the type of buildings that can be sold and the buildings put in their place do not have to match the existing style or height of the area.

The Draft London Plan reads like an over-ambitious, very panicked, badly thought through response to a perceived crisis. If implemented, it will mark the ruin of the Outer London boroughs.

This country needs to start facing up to the realities of the skewed South East bias. The nation requires NEW TOWNS to be built.

If we do not address this crucial situation at a NATIONAL level, we will create enormous urban problems for future generations.

User:	Helen Fuller

- The plan places too much reliance on the role of major infrastructure projects (such as Crossrail 2, the Bakerloo Line extension and HS2) to act as catalysts for development.

User:	Rosalind Readhead

The plan places too much emphasis on the role of major infrastructure projects such as HS2 and Crossrail 2 to act as catalysts for development. Housing and other development schemes can and must be prioritised irrespective of the fate of such major projects.

User: Zbig Blonski

Kingston Opportunity Area

17.The identification and justification for this largely rests on CrossRail 2. The finance and implementation for this has not yet been committed. Even if it is, the Plan states that it would be only be implemented by 2033. This date has been receding since the first proposals were announced. 2033 is at the tail end of the period of this Plan yet much of the justification for this status is based on it. The SHLAA does not demonstrate anywhere near the potential capacity for Opportunity Area levels of development (at least 2,500 net additional homes).

18.In particular the premise for the inclusion of New Malden in this Opportunity Area is not accepted. The potential for housing is not borne out by the SHLAA. There is only one site identified with a capacity of 93 homes. The construction of this is underway. Additional sites are already in the development pipeline and will probably be under construction by the time the new London Plan is in place in late 2019. There are no additional sites identified. The inclusion of New Malden in the Opportunity Area is inappropriate and should be withdrawn.

User: London Wildlife Trust

Crossrail 2 South/ Kingston OA

In para 2.1.24 there is reference to the future “potential to accommodate growth in the following areas: Berrylands and Hogsmill Valley.” We are concerned that this is an important ecological corridor through which the Hogsmill River runs through, which is currently failing status under the European Union’s Water Framework Directive. We would hope the Plan encourages future development to not only respect and protect the Valley’s ecological integrity and riparian assets but also help secure further enhancements to it to help with climate change and flood risk resilience, biodiversity and people’s contact with nature.

User: London Wildlife Trust

Crossrail 2 North/ Lee Valley OA
We note that para 2.1.31 references the Epping Forest SAC, but not the Lee Valley SPA/Ramsar, although it states: “The Planning Framework should also protect and improve sustainable access to the Lee Valley Regional Park and reservoirs.” We recommend that this is amended to:

The Planning Framework should also protect and improve sustainable access to the Lee Valley Regional Park and reservoirs, and ensure links through to Hackney Wick and the Lower Lea Valley. Planning frameworks should include an assessment of any effects on the Lee Valley Special Protection Area and Ramsar site, and Epping Forest Special Area of Conservation and appropriate mitigation strategies.

User:	Enterprise M3 Local Enterprise Partnership (LEP)

The LEP is pleased to see that Crossrail 2 features prominently in the draft Plan, but there is a need to fully consider impact on remaining suburban rail services. In particular there need to be mechanisms in place within the strategy to ensure benefits of capacity released on the South West Main Line are realised across our area and not just in London. Crossrail 2 has the potential to release some 6 or 7 train paths per hour between Wimbledon and Waterloo and investment by Network Rail outlined in the Wessex Route Study, will also provide a number of strategic improvements that will release capacity. Network Rail is proposing major infrastructure improvements such as the Woking and Basingstoke Flyovers, which will provide a significant increase in capacity along the whole South West Main Line. It is imperative therefore that a holistic view as to the best use of this capacity is taken, so that the benefits it can bring are realised by the whole of the South West Main Line corridor and not focused solely on the needs of London.

User:	Natural England

We note that paragraph 2.1.31 references the Epping Forest SAC, but not the Lee Valley SPA and Ramsar site. Therefore **we recommend** that this paragraph is amended to read: ‘Planning frameworks should include an assessment of any effects on the **Lee Valley Special Protection Area and Ramsar site**, and Epping Forest Special Area of Conservation and appropriate mitigation strategies.’ Please refer to our response to the draft Habitats Regulations Assessment (Appendix 1) for our full thoughts on this Lee Valley SPA.

Elizabeth Line East

User: Ms Meenakshi Sharma

This spatial strategy is how the oppression of the poorer and residents of London is being instigated. This affects the ethnic minority population of London to a greater degree as they are proportionately poorer than the indigenous population. This is exemplified in the case of Ilford. Crossrail is being used as an excuse to dump all the housing that other areas in the borough do not want without any due regard for population density, context, character, levels of infrastructure. There has been no modelling to show how much capacity on the rail network there will be, given there is no new line, only the trains will be different. Current marked undercapacity and the developments on the line from Shenfield onwards which will impact on passenger demand have not been considered. This, we are sure, will lead to a crisis in the ability of the Crossrail line to cope with the increasing population.

The Opportunity Area (OA), approach has been found, in practice, to have many problems associated with it highlighted by Just Space. Just Space is an informal alliance of community groups, formed in 2006 to act as a voice for Londoners at grass-roots level, which consults with the Greater London Council. Just Space has identified significant problems in using the OA designation for spatial planning. There has not, to date, been a comprehensive documentation, review and assessment of the impact of OAs on London's development against the principles of the London Plan but Community based evidence suggests overwhelmingly negative effects and indicates that in their current form they should be reconsidered.

Just Space state that given the impact of these OAs on the city, the highest standards of public participation should be expected, including early and full public information and consultation prior to their designation and effective participation early in the planning process. This has certainly not been the case in Ilford South.

Just Space report that using the OA approach leads to vulnerabilities which developers can exploit to put pressure on Boroughs to grant consent for planning which should, by all reasonable standards, not be acceptable. It has also become clear that the kind of development being delivered within the OAs and Housing Zones is having a disproportionately negative impact on poorer communities. They encourage the provision of expensive, high density housing which does not meet the needs of local communities, especially of families, as family housing tends to be discouraged.

The current financial and planning models in OAs also encourages the continuing role of a limited number of favoured Volume Developers who require large cleared sites, entailing clearance of existing housing and businesses and the decanting of communities. High profit expectations and secret viability reports lead to agreements which drive down the delivery of social and affordable housing, and in some cases have led to the suspension of CIL charges. This again has been the case in Ilford South in preceding years. Surely, we need to learn the lessons from the past.

Just Space report that there is no consistency as to what an OA is within London. The designations are given from above without informing, let alone ensuring the effective participation of the people who already live and work in the area. The OAs are deemed to be areas which are capable of accommodating substantial new jobs and or/homes along with the provision of other uses such as retail, leisure and community facilities. The evidence base for this assumption is suspect on many levels certainly within the Redbridge Local Plan.

The evidence base for the level of housing capacity within the individual OAs lacks robust analyses of many factors. This has particularly been the case in the early stages, when the spatial vision was first formulated. These factors include population densities; how much new housing has already been developed in the specific areas in the preceding years; the numbers of legal and illegal flat conversions, 'beds in sheds' and Houses of Multiple Occupation (HMO) in the area, which, obviously, increases population levels.

The evidence base for the assertions that each individual area can accommodate the infrastructure required is very superficial. There have been no properly audited infrastructure needs specific to the Ilford South area. There has not been an adequate taking into account of the effects of the real population increase, if the quantum of housing as proposed takes place.

Schools in llford South are already having to be expanded to cope with the current population, which is leading to the further loss of open space. There is simply not the room for extra buildings on the scale required, leading to any new school in Ilford South being on a smaller 'footprint' of land than desired, with children having less space to move around and little access to outside green and play areas. Open Space levels are already well below acceptable levels in Ilford South, yet further open space will be lost through this Plan. This will add to the health and well-being inequalities in the borough, which is already very divided in terms of deprivation.

Public Transport Accessibility Level (PTAL) is used repeatedly to justify high density levels of housing in Ilford South. The use of PTAL on its own is not a useful indicator of housing capacity as, obviously, it needs to be used in conjunction with current and projected levels of transport saturation, particularly at peak times. The true extra capacity that Crossrail will bring to the stations at Chadwell Heath, Goodmayes, Seven Kings and Ilford has not been analyzed in a comprehensive way, yet Crossrail is constantly used as the driver of this housing growth. In addition, there have been no parking stress surveys carried out in Ilford South when it is known that parking is already a huge issue, causing much conflict.

It is also not clear which jobs are envisaged for Ilford South with this spatial approach. The emphasis on entrepreneurial space appears to indicate that self-employment rather than sources of employment may be the strategy, which may not bear very much fruit and a ‘dormitory’ culture may well predominate.

Just Space highlight the issue of the sustainability of large transport investments such as Crossrail, which produce dense, high rise housing around well-connected nodes. They say this creates ‘dormitory’ neighbourhoods and generates additional travel requirements. In addition, it elevates the costs of housing to unaffordable levels, which has already been the case in Ilford South and which will continue unabated under this spatial strategy.

Thus, this policy is already being instigated in the London Borough of Redbridge with devastating consequences for the residents of Ilford South. The concentration on high density developments is leading to small 1-2 bed high rise flats with little amenity space and which are totally unaffordable for the local population. If that is what you want for London then please be open about it. It is not what the majority of residents, especially those with families, who are struggling to find accomodation want.

The green areas, including Green Belt need to be considered on a site by site basis just like brownfield sites should. Brownfield cannot simply mean anywhere that has been built on, as what is happening in Redbridge is that anything and everything is up for grabs for the developers. Density is an issue and density guidelines should not be taken away and in fact greatly strengthened. There needs to be safeguards because it appears brownfield sites only seem to exist in the poorer areas, as the planning system is inherently biased in favour of the more affluent. Conservation area designation and the fact the more affluent have the social capital and skills to navigate the Planning system to stop planning applications, leaves the poor and vulnerable open for exploitation.

Enabling Infrastructure

User:	London Borough of Camden

A robust approach needs to be taken to economical viability to ensure that contributions to affordable housing and transport through section 106 and Mayoral CIL do not remove the ability of boroughs to fund these items through planning obligations. The Mayoral CIL needs to be set at a level which will leave a sufficient viability buffer to allow these items to be funded.

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A robust approach needs to be taken to economical viability to ensure that contributions to affordable housing and transport through section 106 and Mayoral CIL do not remove the ability of boroughs to fund these items through planning obligations. The Mayoral CIL needs to be set at a level which will leave a sufficient viability buffer to allow these items to be funded.

Annex One Town Centre Network

User: Ms. Amalia Cebreiro

Object - It is unclear how this map has been produced.

I am led to believe by RBKC Council officers that areas for regeneration have been identified by referring to the indices of multiple deprivation obtained from the 2011 Census and other subsequent surveys.

As Chair of The Cremorne Residents Association, which is located within one of the areas identified for regeneration, I do not believe this is an accurate or appropriate way of identifying areas in need of urban or estate regeneration.

On the Cremorne Estate a significant proportion of the population is of retirement age. These households may show up in the census and other surveys as having low incomes and not being economically active but this does not justify any plans for urban or estate regeneration.

Object - Such proposals or schemes will fail to address the actual real needs of these residents. Any form of regeneration that requires these households to be moved or decanted is likely to have severely detrimental effects, both physically and psychologically, on the health of these residents and on the cohesion of the local community.

For those residents of working age, perhaps with children, any such moves or decants will have an obvious impact on their employment, with a potential loss of jobs, and on the education of their children, as they will most likely have to change schools.

For those residents with disability any relocation will have a massive impact on their existing needs provision thereby having obvious consequential negative repercusions on the public purse as all these have to be reprovided after each and every move.

Any relocation will also disrupt the support networks of all of the above groups, whereby they lose access to their wider families and neighbours that provide such facilities as carers whose loss may impact on their ability to be independently economically active.

Displacement may also have a negative effect on young people which may result in a higher level of crime. This would not only have social consequences but also economic consequences for the public purse.

User:	Brent Cyclists (LCC Local Group in Brent)

Object - Brent Cyclists are horrified by the highlighting of Brent Cross as an area of high growth. All the proposals for Brent Cross area completely unsuitable for active travel, will cause the area to continue to breach air quality guidelines, and will not reduce motor vehicle use. The Mayor must not continue to support developments in Brent Cross as long as they continue to breach London Plan requirements.

User:	London Borough of Hammersmith and Fulham

Support - Table A1.1 on Town Centre Networks proposes that the current town centre designation for Shepherds Bush which is a Metropolitan centre should be re-designated as an International centre. We welcome this proposed change in classification as we feel that it accurately represents the current scale and operation in which the town centre currently operates.

User: Eton Conservation Advisory Committee

We would raise serious concern over:

1. ***The designation of Camden Town with 'potential' for a Metropolitan Centre.*** Camden Town is located on an already congested road and public transport north/south links into the centre of London; it is an already congested tourist and retail area particularly at its northern end (Camden Lock) surrounded by important conservation areas (e.g. Regents Park)and with significant heritage assets. This pressure for development is already having an impact on residential areas on the lower slopes of Hampstead e.g. the recently approved high rise re-development immediately next to Chalk Farm Station/applications for illuminated digital signs. Proper impact assessments need to be undertaken at Borough and local level in consultation with potentially affected local communities.

User:	Get Living London

GLL supports the Town Centre Network and Future Potential Network Classification set out in Annex 1 of the London Plan. In particular, GLL welcomes reference to Stratford accommodating high commercial growth potential (albeit cautious about the office guidelines – see Rep No. 4 and 5 below) and high residential growth potential.

GLL also welcomes the Metropolitan Centre network classification of Stratford with a future potential network classification to International. This recognises the transformational change that has occurred in East London and strategic direction and support that this will and should continue.

No amendment sought. General support.

User:	London Borough of Merton

The Spatial Development Pattern objectives are supported. However Morden town centre is not specifically mentioned in the draft London Plan, despite the GLA/TfL investment and its opportunity to deliver new homes on public sector brownfield land using the Healthy Streets approach (with the exception of page 486-487 (Table A1.1 - Town Centre Network Ref 158) which identifies Morden as a district town centre).

User:	London Borough of Merton

The colours shown in the key and the map in Figure A1.1 (Annex 1) do not match and require clarification as to which town centres are being shown.

All of the Figures in Annex 1 would be more useful if they were provided in an interactive map format i.e. an online interactive map where users could zoom into a particular borough or area that provided labels for each of the different town centres and areas for regeneration.

User: N/A

Further to concerns raised with me by local councillors and constituents, I am writing to you with regard to the London Plan and its potential impact on the Petts Wood and Knoll ward in constituency.

I am concerned as the plan identifies Petts Wood and Knoll as having a ‘medium residential growth potential’. This differs substantially from the London Borough of Bromley’s assessment of the area, which they have determined as being full as far as feasible building sites are concerned.

It is therefore questionable how the objectives of the London plan are going to be realised without either the demolition of existing building or green land being redesignated to brownfield sites. Both of these options would have profoundly negative consequences for the local area.

Petts Wood and Knoll are both party covered by conservation areas, with both also having a special residential character.

I would be grateful if you could ensure the very serious concerns of the area’s local councillors and residents are taken into account.

User: Marble Arch Partnership

There is no evidence in the Plan to downgrade the growth forecasts for the Edgware Road (south) town centre compared to the current London Plan, and we would support a policy approach that promoted commercial growth in and around our area, particularly given the loss of office space to residential over the last three years.

We support the approach taken by Policies SD6 to SD8 although we question why the growth potential and the night time economy cluster have both been downgraded for our area that the plan recognises as the Edgware Road South centre. We have well over 100 eating out venues in our area, including a renowned concentration of restaurants offering a wide range of Arabic cuisines which attracts people from all over London and from overseas, particularly during the summer.

User: The Hammersmith Society

Annex 1 Town Centre Network and Future Potential Network Classification, fig A1,1 “Future Potential Changes to The Town Centre Network”

Shepherds Bush is shown as an International Town Centre. On p84 fig 2.18 international Centres are described as High-*order comparison and specialist retail / flagship stores/office headquarters/government buildings/international culture, leisure and entertainment destinations/international tourism function.*

While the ongoing development of Shepherds Bush/Westfield/Imperial includes specialist retail / flagship stores it is otherwise focussed on residential intensification and academic/research activity. The majority of the criteria for International Town Centre do not feature at Shepherds Bush and this future classification for the area should be suspended pending further study as it would put undue strain on the local infrastructure.

User: Just Space

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

We propose inserting clarification on this in Annex 1:

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

User:	London Borough of Ealing

We note that there are no changes to the London Borough of Ealing's Town Centre Network set out in Annex 1. However, we note that Figure A1.3 identifies the potential for residential growth within existing town centres. Whilst the potential for significant (high) growth within some of these centres (Ealing and Southall) is accepted, the potential for significant growth occurring within the other centres (Greenford, Hanwell and Acton), is improbable. We understand that these growth categorisations were informed by the Strategic Housing Land Availability Assessment (SHLAA), and yet this exercise identified significant variations in the extent of potential development opportunities (approvals, potential development and allocations) within our town centres. For example, the SHLAA did not identify significant capacity with Greenford or Hanwell town centres. It is unclear therefore how these categorisations have been determined. We can only assume that either very low thresholds have been used, in terms of the potential capacity which might be yielded within these centres, or opportunities beyond the town centre boundaries have factored into this classification. This needs to be urgently clarified.

User: London Borough of Bexley

Page 465 Commercial Growth Potential: Bexleyheath has been classified as ‘low growth’ in **Table A1.1** due to either a) physical, environmental or public transport accessibility constraints, or b) low demand, although the table does not make clear which. The Council’s aspirations for Bexleyheath town centre are more closely aligned to the medium growth definition. Bexleyheath town centre has capacity to accommodate identified demand for town centre floor space. Bexley’s Retail Capacity Study 2015 identified a potential for between 19,000sqm and 23,000sqm of comparison floor space up to 2036.

Page 467 Residential Growth Potential: Bexleyheath has been allocated for ‘medium residential growth potential’ in **Table A1.1**. Although we understand the classification is derived from the SHLAA and other factors, the definition of ‘medium residential growth’ should be published and the associated methodology behind this allocation made clear. Two town centres outside of Bexley’s growth areas, Welling and Sidcup, have been allocated as medium growth. A more detailed definition would help us to understand the figures behind the term ‘medium growth’ as we do not accept they offer appropriate opportunity.

User:	New West End Company

Within Annex A, “Town Centre Networks” the West End is recognised as one of two International Shopping Centres in London in this list :

“International centres – London’s globally-renowned retail and leisure destinations, providing a broad range of high-order comparison and specialist shopping, integrated into environments of the highest architectural quality and interspersed with internationally-recognised leisure, culture, heritage and tourism destinations. These centres have excellent levels of public transport accessibility.”

In the accompanying table of retail centres it states that the West End is judged to have :
• Night-time economy classification 1 (NT1)– area of international or national significance
• Commercial growth potential - high
• Residential growth potential – incremental

User: Camden Town Conservation Area Advisory Committee

in Annex 1 provides ‘an indication of potential future changes to the town centre network over the Plan period, including new potential centres’. While 2.7.4 states ‘These centres are not recommended for immediate reclassification’, the Draft Plan appears to have made a reclassification for Camden Town against the policies of the local Borough and against the criteria of the Plan.

Our proposed amendments – reasoning: to achieve consistency in the Plan.

Our proposed revision: to return the designation of Camden Town to a ‘major town centre’ – or indeed to a local centre again – in Table A1.1.

User: Croydon Limited Partnership

CLP welcome the continued recognition of Croydon as a Metropolitan centre and support the strategic objective set out in Policy SD7 that International, Metropolitan and Major town centres should be the focus for the majority of higher order comparison goods retailing, whilst securing opportunities for higher density employment, leisure and residential development in a high quality environment.

Table A1.1 provides further detail in respect of the roles of each town centre and Croydon is identified as an area of regional or sub-regional significance in respect of its function within the night time economy; an area with high commercial and residential growth potential; and a centre which has the capacity, demand and viability to accommodate new speculative office development. Croydon is also classified as a strategic area for regeneration. CLP welcome the ongoing recognition of Croydon's growth potential in respect of the identified development sectors which will assist enable its regeneration to come forward.

It is noted that Figures A1.1 to A1.5 which support Table A1.1 are a useful addition but are difficult to navigate and should include labels so that specific centres can be easily recognised.

User: Highgate Society

Table A1.1*The Plan's Town Centre proposals*

An examination of the Plan's town centre list shows a division into International town centres, Metropolitan town centres, Major Town Centres and District Town Centres, together with several smaller categories, 239 in all. Centre Index.

The Society is concerned that Highgate High Street and Archway Road, both community-based shopping streets, are excluded from this list. Because the Plan sees the London Boroughs as the prime planners and movers in its implementation this puts Highgate in an unfortunate position, with no single borough having overall responsibility for Highgate as a whole. In this respect it is disadvantaged, in comparison with Muswell Hill, East Finchley, Archway, Kentish Town and many other similar areas which are designated coherent District Town Centres which will be monitored and represented by the boroughs in which they are located.

Despite the fact that Highgate is divided between two boroughs, Highgate's unique position and interests as a world class heritage site, with valuable green spaces and attraction to other Londoners and to tourists, makes it essential that it is regarded as a distinct area with distinct interests. The Highgate Neighbourhood Plan looks at Highgate holistically and so must the London Plan

User:	Chairs of Camden's Conservation Area Advisory Committees

Table A1.1 in Annex 1 provides ‘an indication of potential future changes to the town centre network over the Plan period, including new potential centres’. While 2.7.4 states ‘These centres are not recommended for immediate reclassification’, the Draft Plan appears to have made a reclassification for Camden Town against the policies of the local Borough and against the criteria of the Plan.

Our proposed amendments – reasoning: to achieve consistency in the Plan.

Our proposed revision: to return the designation of Camden Town to a ‘major town centre’ – or indeed to a local centre again – in Table A1.1.

User:	Standard Life Investments

Annex 1 Town Centre Network

The identification of Gallions Reach as a future major centre at Figure A1.1 is welcomed. However, for the reasons set out above it should be identified as being a major centre now to enable commensurate growth to be permitted by the Local Planning Authority.

User:	London Borough of Ealing

The Council supports this policy.

But the Council objects to the downgrading of Southall from an area of ‘more than local significance’ in the current London Plan to a proposed ‘no classification’.

This makes little sense as continuing regeneration and development efforts improve the variety of Southall’s offer and the attractiveness of its environment and immediately before the huge boost to its accessibility that Crossrail will deliver.

User:	London Borough of Sutton

SUPPORT WITH CONDITIONS. The London Borough of Sutton supports this policy and considers Carshalton Village and Cheam Village should both be designated NT3 (areas with a night-time economy of more than local significance). The council considers that both centres “punch above their weight” in terms of the night-time economy: Carshalton Village in terms of an array of historic pubs, which draws customers from Croydon and Mitcham and Sutton; and Cheam Village in terms of its choice of restaurants, which draws diners from beyond the Greater London boundary.

User: RDI REIT

Colliers Wood

Our client supports Merton Council's aspirations for the growth and diversification of Colliers Wood's offer. In particular, the provision of new leisure uses will enhance the evening time economy and provide an additional facilities to meet the requirements and expectations of local residents. To assist within achieving these aims, the Colliers Wood District Centre should be included in Table A1.1 'Town Centre Network' of the new London Plan.

The emerging London Plan defines a district centre as:
'District centres – distributed more widely than Metropolitan and Major centres, providing convenience goods and services for more local communities and accessible by public transport, walking and cycling. Typically, they contain 5,000– 50,000 sqm of retail, leisure and service floorspace. Some District centres have developed specialist shopping functions.'

Colliers Wood currently provides all the necessary characteristics of a district centre in both quantitative and qualitative terms. It accommodates a 11,000 sq m Sainsbury's foodstore, 9,000 sq m M&S variety store, 15,000 sq m of additional non-food floorspace, an array of cafes and restaurants, public houses, post office, two hotels, a new public library, schools, and places of worship. A significant increase in the residential population of the District Centre is being delivered through the Britannia Point (182 units), Wimbledon Reach (60 units), and Morris Court (42 units) developments. The District Centre is also well served by public transport making it an attractive place to visit, work and live.

It follows that the Colliers Wood District Centre should be included in Table A1.1 of the new London Plan. This acknowledgement of Colliers Wood's new status will assist in attracting further private sector investment to ensure future policy objectives can be achieved over the development plan period.

User:	London Borough of Bexley

The Council welcomes the identification of Bexleyheath in **Figure 7.7** as a cluster of night-time activity; however the designation as only ‘more than local’ significance is inaccurate. Bexleyheath has a sub-regional significance, and it is requested that it be designated as **NT2 Regional/Sub-regional** in **Figure 7.7** and also in **Table A1.1** of **Annex 1**. There is also a growing night-time economy in Sidcup, which has a focus on the performing arts, and in the riverside town of Erith.

User:	Rugby Football Union

As detailed above, the RFU consider that Twickenham Stadium is of national significance and should, therefore, be detailed on Table A1.1 and Figure 7.7 as an NT1 ‘Areas of international or national significance’ site. In this regard, the RFU consider that paragraph 7.6.4 of the draft Plan that states “Areas of international or national significance play a crucial role in putting London on the world stage, bringing internationally-renowned culture, performers and productions”. The RFU considers that this statement directly applices to Twickenham Stadium and, therefore, this should be reflected within the Plan to ensure support for the Stadium and ensure its continued use as a Stadium of national, and international significance.

It is noted that Twickenham town centre is included within Table A1.1 and Figure 7.7 and is noted as being an area with ‘more than local significance’.

User: Telegraph Hill Society

SD10 Objection

New Cross/New Cross Gate is stated in Annex 1 as an area for medium residential growth with transport capacity to support this. This is not currently the case as regards New Cross Gate and the policy with supporting Annexes (or the definition of the area) needs amending appropriately.

The lines through New Cross Gate station (Southern and TfL Overground franchises) are currently at capacity with trains often impossible to board during the rush hour. Any increase in housing stock in New Cross Gate of the order anticipated (as contrasted with the area served by New Cross station) is wholly dependent on the funding and development of the Bakerloo Line extension.

User:	F&C UK Property Fund ICVC

F&C is supportive of the identification in the draft London Plan of Romford Metropolitan Centre as an area with high residential and commercial growth potential (Table A1.1 in Annex 1) and the requirement for Boroughs to plan proactively to seek opportunities for residential growth in and around town centres (page 467).

User:	London Borough of Wandsworth

The recognition of the night time economy and some of the means of managing its impact is generally welcomed. However, the policy is mainly concerned with promotion of the night time economy and the Council considers that the wording should also recognise the importance of proactive management plans in considering the possible negative impacts to ensure clarity on the management of possible conflicts. Clapham Junction is identified as having a night time economy role of regional/subregional importance with Putney & Tooting of ‘more than local’ importance but there is a lack of clarity as to what this means in practice and why Wandsworth Town is not recognised.

User:	London Borough of Southwark

The council supports the classification of night-time economy areas in the CAZ, Peckham, Elephant and Castle and Canada Water in Southwark as identified in Annex 1. The council supports the diversification of night-time activities and measures to ensure safety and activity in the ambition for a 24-hour City. The council recommends Old Kent Road is also classified as an area for the night-time economy.

User: Westminster City Council

While it is reasonable to require that changes to the classification of international and metropolitan centres should be coordinated through the London Plan as suggested in criterion C, there is much less justification for such a level of prescription with major centres (in Westminster's case this relates to that part of the Queensway/Westbourne Road centre that lies within its boundaries). At this level, boroughs will be much better placed to identify and respond to changes meriting reclassification, which is far less likely to raise strategic issues. Changes to the classification of these should be something boroughs can take forward through revisions to their local plans in consultation with the Mayor (who, after all, has a formal role in the plan-making process).

In Annexe 1, it is questioned why Edgware Road/ Church Street, Marylebone Road, and Warwick Way/ Tachbrook Street have all had their commercial growth potential downgraded from medium in the previous London Plan, to low in the current draft. In particular, Edgware Road/ Church Street is earmarked for significant regeneration as part of the Housing Zone proposals which are being developed and implemented by the Council and the Mayor. We would also like to understand the basis for the downgrading of the night-time economy status of Knightsbridge, Edgware Road and Marylebone.

User: London Borough of Wandsworth

There would be benefits to the Wandsworth town centres of a level of intensification of business activity and we support the assessment of our main town centres as having ‘moderate’ commercial growth potential. However, growth potential is strongly influenced by infrastructure investment in particular centres which is sometimes transformative; this is especially the case for those areas earmarked for Crossrail 2 stations. Whilst such changes may not in themselves justify changes to the status of town centres within the London Plan network definition, the relevant policies are somewhat silent on how town
centres might manage the impact of significant new infrastructure (including during its construction) and there could be better linkages with other parts of the Plan in this regard. The London Plan now recognises Southfields as a ‘District Centre’ along with Balham and Earlsfield, which were both identified in the previous London Plan. The recognition within the centres hierarchy would not change the local designation and is confusing. The Council designates its centres as part of the Local Plan process and it is expected that the scale of development proposals should reflect the position of the Southfields centre as a Local Centre in the Local Plan town centre hierarchy. The Mayor should consider renaming the Network ‘Town and District Centres Network’ and recognising local centres in the text rather than simply referring to town centres. As currently worded, there is an implication that the District Centres listed in Table A1. 1 are town centres, which they are not, and which contradicts the Plan’s own definition of District Centre ‘… providing ….. for more local communities’. This could be interpreted by developers as suitable for largescale development serving a wider catchment and encourage inappropriate development proposals. An introductory paragraph of explanation regarding Local Centre designations would help avoid any misinterpretation of the role and function of the District Centres listed.

Vauxhall is identified as a smaller CAZ frontage in Lambeth Council’s adopted Local Plan providing local shops and services. It is unhelpful that the draft London Plan includes Vauxhall as a CAZ retail cluster which is defined as being ‘significant’ and broadly comparable to Major or District centres. It is considered that Vauxhall similar to the point above it is considered that the centre will remain as a Local centre. It is important to ensure that the majority of retail growth and larger floorplate stores are located at the Battersea Power Station potential major town centre, in accordance with the Wandsworth Local Plan

User:	London Borough of Tower Hamlets

We support the upgrade of Canary Wharf from a Major Centre to a Metropolitan Centre.

Crossharbour should be identified as a district centre as per the Local Plan; it is missing from figure 2.16.

User: Argent (Property Development) Services LLP

Policy SD7 – Town Centre Network

As well as being Opportunity Areas, many of Argents interests are located in existing or future designated town centres. Argent supports the general approach to town centres but are concerned that there is no distinction between whether the policies (SD6 to 8) relate to existing or future town centres. The supporting text and policies should make this clearer.

Policy SD7 is concerned with the town centre network and Table 1.1 sets out future potential changes to the town centre network. Brent Cross is identified as a centre which has the potential to be re-classified as a Metropolitan Centre in the future (see also Paragraph 2.7.4).

However, Brent Cross should be re-classified as a Metropolitan town centre now as part of the current Plan rather than deferring it until later. The Planning Permission for Brent Cross regeneration scheme has now been implemented (Ref No F/04687/13). Argent has secured Reserved Matters approval for the detailed design of Phase 1A (South) and Phase 1B (South), delivering over 300 residential homes to the south of the A406. The Brent Cross Cricklewood Development Partners also have detailed permission for phase 1(A) North, which contains all key infrastructure including expansive highway and junction improvements, and Phase 1B(North), which includes the transformation of Brent Cross Shopping Centre.

Brent Cross should also be allocated a night-time economy classification. The approved development will deliver a mix of evening activities, including cultural, leisure, entertainment, food and drink, and shopping facilities.

User: HB Reavis UK Limited

HB Reavis supports policy SD7 which emphasises that the changing role of town centres should be proactively managed in relation to the town centre network as a whole, in order to support sustainable economic growth across the Greater London boundary to enhance the vitality and viability of London's centres.

Policy states that identified deficiencies in the London town centre network can be addressed by promoting centres to function at a higher level, designating new centres or reassessing town centre boundaries. In terms of designating new centres, Figure A1.1 within Annexe 1 shows the Future Potential Changes to the Town Centre Network.

HB Reavis considers that given the regeneration potential and strategic importance of Waterloo within Lambeth, the Mayor should give consideration to designating a CAZ Retail Cluster at Waterloo in order to support Waterloo's role within the CAZ as a business, retail, residential, cultural and tourist destination, and recognising its Opportunity Area designation to deliver significant numbers of new jobs and homes.

User:	Brent Cyclists (LCC Local Group in Brent)

Brent Cyclists support the identification of Town Centres, however are concerned that this misses existing centres in Brent of local and international importance. 1. Wembley is a international centre, as are developments in Stratford. 2. Brent Cross is missing as a Metropolitan Town Centre.

User: Unknown

Our client supports Policy SD7 of the London Plan, particularly the need to identify deficiencies in the London town centre network by promoting centres to function at a higher level. Whilst our client's site is located within a designated Major town centre, it is a high performing and growing centre that continues to increase its retail, leisure and commercial offer and should therefore be considered for Metropolitan status.

The draft plan describes Metropolitan centres as serving wide catchments and typically containing at least 100,000 sqm of retail, leisure and service floorspace. These centres should have good accessibility, employment, leisure and service functions.

The draft plan states that Metropolitan centres can only be changed through the London Plan. For that reason, detailed below is the list of requirements for a Metropolitan centre together with justification for why Wembley should be awarded Metropolitan status:
• High order comparison retail
• Large shopping malls

• Town halls and civic buildings
• Larger offices
• Sub-regional culture, leisure and entertainment function

Wembley benefits from all of the above elements. Our client's site has more than 50,000sqm of commercial space; including over 20,000sqm of A1-A5 use, 25,000sqm of C1 Hotel Use and a 3,500sqm 9 screen cinema. A further 40,000sqm of mixed use commercial floor space will become available between 2018 and 2020. When completed, a total of over 100,000sqm of commercial space will be provided and the majority of this floor space will be provided within the Wembley town centre boundary. Furthermore, these figures only relate to our client's site and do not take into account the further commercial floor space provided on Wembley High Road and elsewhere within the Wembley Opportunity Area.

Since its opening in 2013, the London Designer Outlet (LDO) has been an extremely successful retail centre and is the only designer retail outlet within the M25, attracting over 6 million visitors a year for retail, leisure and work. The shopping mall benefits from the largest catchment density for any UK outlet centre as the London Designer Outlet is the nearest outlet centre for 5.8 million people.

Brent Civic Centre is situated on Engineers Way in the town centre and accommodates the headquarters of the London Borough of Brent. The building opened in 2013 and provides office space for over 2,000 Brent staff. The building provides the majority of the Council's services as well as acting as a community hub. The Civic Centre also includes a library, two cafes, entertainment spaces, meeting rooms and a garden used for weddings and ceremonies.

User: Central Acton Neighbourhood Forum

Very extensive evidence was submitted in previous rounds of the Plan that when assessed against the criteria the Plan sets out, Ealing no longer merits its classification as a Metropolitan Centre. Metropolitan centres are supposed to serve wide catchments extending over several boroughs, contain 100,000 m2 retail, leisure and service floorspace and have a significant proportion of high-order comparison goods relative to convenience goods. Ealing has only been able to hold on to its metropolitan centre designation thanks to the highly dubious combination of two separate centres - Ealing and West Ealing - which are 1km apart. Between them these two places may once have boasted higher level attractions when the retail hierarchy was first established, but neither has kept pace with changes within the West London sub region and both struggle to attract customers even from within the Borough. Department stores, leisure and other town centre attractions have now departed both centres which do little more than attract convenience shoppers and coffee drinkers. Successive rounds of planning have done nothing to reverse this decline, and the continuing misclassification of the centre makes a mockery of what the hierarchy claims to be for. It has created a policy vacuum which policy makers at all levels appear to have totally turned their back on.

User: Ealing Matters

Very extensive evidence was submitted in previous rounds of the Plan that when assessed against the criteria the Plan sets out, Ealing no longer merits its classification as a Metropolitan Centre. Metropolitan centres are supposed to serve wide catchments extending over several boroughs, contain 100,000 m2 retail, leisure and service floorspace and have a significant proportion of high-order comparison goods relative to convenience goods. Ealing has only been able to hold on to its metropolitan centre designation thanks to the highly dubious combination of two separate centres - Ealing and West Ealing - which are 1km apart. Between them these two places may once have boasted higher level attractions when the retail hierarchy was first established, but neither has kept pace with changes within the West London sub region and both struggle to attract customers even from within the Borough. Department stores, leisure and other town centre attractions have now departed both centres which do little more than attract convenience shoppers and coffee drinkers. Successive rounds of planning have done nothing to reverse this decline, and the continuing misclassification of the centre makes a mockery of what the hierarchy claims to be for. It has created a policy vacuum which policy makers at all levels appear to have totally turned their back on.

User: Team London Bridge

We support recognition of London Bridge as a Retail Cluster in the Central Activities Zone (Table A1.1).

We do not support the classification of London Bridge having “medium” residential growth potential. This is not consistent with its location in the Central Activities Zone as both a retail cluster and a specialist cluster because of its arts, cultural and creative businesses and activities. The success of these roles will require careful balance to be struck with other competing uses and within the London Bridge area we believe a clear priority needs to exist for commercial office, retail and leisure uses over residential. This is consistent with Policy SD5 C of the draft London Plan which states “Offices and other CAZ strategic functions are to be given greater weight relative to new residential development in other core commercial areas of the CAZ.” These other areas include London Bridge because of its dual role as a cluster and as an Opportunity Area.

The Strategic Housing Land Availability Study informing the London Plan also fails to identify significant capacity on large sites in the London Bridge, Borough and Bankside area (Figure 4.15). In our experience the potential from small sites is also low given the importance of the area’s retail, cultural and office role.

Recommendation

- London Bridge to be reclassified as having “incremental” potential for residential growth

User:	London Borough of Lambeth

Lambeth believes the proposed classifications of some of its town centres does not accurately reflect their scale and character:

- Brixton should be classified as a Metropolitan town centre, rather than a Major centre. The quantum of commercial floorspace in the centre will grow as a result of planned regeneration and development schemes, with the Council now a major workspace provider in Brixton. Metopolitan status would also more accurately reflect Brixton's unique role in the economy of London.
- Brixton meets the definition of both B and C under office guidelines. These categories are not mutually exclusive. Please either clarify the categories or allow centres to fall into more than one.
- Vauxhall should be NT1 rather than NT2: it is widely known nationally and internationally as a cultural centre and destination for the LGBT community, given key venues such as the Royal Vauxhall Tavern
- Vauxhall should be classified as a district centre rather than a CAZ retail cluster, to reflect the scale of commercial development coming forward.
- West Norwood/Tulse Hill should be NT3 rather than unclassified: it is emerging as a night-time economy destination of more than local significance with the opening of a new theatre and cinema
- Streatham should be NT2 rather than NT3 to reflect the range of its night-time and cultural offer.
- Herne Hill should be classified as a district centre given the quantum of retail, leisure and service floorspace in the centre (across two boroughs) and its key role in providing convenience goods and services to local communities, with high accessibility by public transport, walking and cycling

- The place ‘Waterloo and Southbank’ should be recognised and reclassified as a major town centre given the scale of retail and other commercial development coming forward in the next five to ten years (e.g. at Waterloo International Terminal, the Shell Centre and Elizabeth House – please see the table below setting out the quantum of commercial space in the planning pipeline). Within this Lower Marsh/The Cut should continue to be recognised and protected as a distinct retail cluster characterised by predominantly independent businesses.

Consented Sites	**Retail (A1-A5)**	**B1 office**	**Status**
Former Waterloo International Terminal	12,100sqm		Under construction
Mezzanine Waterloo station	2,000 sqm*		Complete - let
Elizabeth House, York Rd	1,000sqm	88,649sqm	Consented
South Bank Place. York Rd	5,986sqm	76,043sqm	Part Complete/ pre let
Leake Street arches	2,170sqm		Part complete / pre -let
Chariots site, Lower Marsh	785sqm		Consented
ITV	250sqm*	44,000sqm*	Consented subject to s106 agreement February 2018
Total	**24,305 sqm**	**208,000sqm**	

Annex Three Glossary

User:	Mr Chris Gannaway
though SINC is in the abrevations, it is not in the glossary as Site of Importance for Nature Conservation	

User:	Rosalind Readhead

I support Policy T6.1 F. The provision of car parking should not be a reason for reducing the level of affordable housing in a proposed development. But the definition of affordable housing must be clear. This is a loophole and needs to be more robust. Social housing must be clearly defined and not open to loopholes.

User:	Ministry of Housing, Communities & Local Government
The definition of sustainable development should confirm that it follows the NPPF definition.	

User:	Redington Frognal Neighbourhood Forum

The following addition and amendments are suggested.

Car-free development
Development which does not include off-street (or basement) parking provision.

Conservation
The process of maintaining and managing change to a heritage asset in a way that sustains, preserves and enhances its significance

Green infrastructure
A network of private gardens and other green spaces – and features such as street trees – that is planned, designed and managed to deliver a range of benefits. These include mitigating flooding, cooling the urban environment and enhancing biodiversity and ecological resilience, as well as providing more attractive places for people.

User: Community Led Housing London

References to community led housing in the current draft London Plan have a footnote to the glossary, but there is no definition present in the glossary. This is clearly an oversight that should be corrected.

The following definition has been agreed by the sector and is also used by MHCLG, and should be included in the **London Plan Glossary**.

Community led housing is where people and communities play a leading role in addressing their own housing needs. It comprises the following three principles:

i. A requirement that meaningful community engagement and consent occurs throughout the process. The community does not necessarily have to initiate and manage the development process, or build the homes themselves, though some may do.

ii. The local community group or organisation owns, manages or stewards the homes and in a manner of their choosing.

iii. A requirement that the benefits to the local area and/or specified community must be clearly defined and legally protected in perpetuity.

This definition includes various forms of community-led housing such as cohousing, housing cooperatives, community land trusts (CLTs), self-help housing, other CICs, and non-profit self-build groups. A brief description of these forms or approaches is provided below, but further information and examples are available on request.

Cohousing communities are created and run by their residents. Each household has a self-contained home but residents come together to manage their community and share facilities and activities, recreating the neighbourly support of the past. The homes are typically owned on long leases, with residents jointly owning the freehold of the site, although homes can also be let or rented on a mutual or co-operative basis. (Please note cohousing is not to be confused with "co-living" branded development with an independent private landlord which is the focus of *Policy H18 Large-scale purpose built shared living)*.

Community Land Trusts (CLTs) enable ordinary people to develop and manage homes as well as other assets such as workspace. Anybody in the local community can become a

member and vote on the board. Most focus on genuinely and permanently affordable housing which is equivalent to sub market rented or intermediate ownership tenures.

Cooperative and mutual housing enables the residents to democratically control their housing organisation, which typically offer rented accommodation to members. This can result in benefits for members such as a better service and new skills. TMOs with strong democratic governance can also be considered under this approach.

Self-Help Housing involves groups of people bringing empty properties back into use. Groups often involve people who can’t afford to buy or rent their own home, and who are unlikely to get a tenancy from a local authority or a housing association, including people who are unemployed and/or homeless.

In reality many schemes employ a mixture of these approaches in the setup and running of community led homes. There is also a large degree of overlap with definitions in the

Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) around the "building or completion by individuals or associations of individuals … of houses to be occupied as homes by those individuals". The collective nature of community led housing offers a great deal of scope to achieve multi-storey higher density schemes as local authorities fulfil their duties under the act "to give suitable development permission in respect of enough serviced plots of land to meet demand" rather than providing low density individual "plots".

Taken together these various forms provide a range of tenures equivalent to Market, Intermediate, and Low-cost rent. This means policies such as *Policy H7 Affordable housing tenure* can work in tandem with community led housing. Although as community led housing is led by Londoners meeting their own demands, the aim is usually to make housing genuinely affordable.

What makes community led housing unique is those involved in the development process, ownership and management of a scheme are either future residents, or members of the community working with future residents. The definition above provides a comprehensive and inclusive description of this.

User:	South East Waste Authority Planning Advisory Group (SEWPAG)

7. As it stands the London Plan implies a meaning to the term ‘circular economy’ and related terms (‘circular economy principles’; ‘highest use’) but it is considered that the effectiveness of the Plan would be improved if clear definitions for such terms were included. For example, SI7 A 1) states that waste reduction etc. will be achieved by ‘promoting a **more** circular economy…’. It is noted that the term ‘circular economy’ is not explained in the glossary.

User:	Orbit
As stated under the comment for Policy H12, Orbit request the inclusion of two bedroom units within the definition for family housing.	

User:	Orbit
Orbit requests the inclusion of a standardised definition of habitable room as boroughs across London currently use different definitions.	

User: Queen Mary University of London

Med City

The draft London Plan refers to the development of a specialist ‘MedCity’ cluster which is defined in the glossary as,

“An enterprise to promote and grow life sciences investment, entrepreneurship,

collaboration and industry in London and the Wider South East. MedCity is a partnership between the Mayor and the Academic Health Science Centres in London, Cambridge and Oxford.”

The inclusion of the above definition within the plan reinforces the aspirations of the University to develop a Life Sciences cluster at Whitechapel and is further supported in **Policy E8** (Sector Growth Opportunities and Clusters) which outlines that clusters such as Tech City and MedCity should be promoted and new clusters encouraged. The supporting text of Policy E8 (Sector Growth Opportunities and Clusters) identifies ‘Life Sciences’ as a specific business growth opportunity and states that development plans should support the range of existing and proposed medical and life sciences research districts associated with MedCity, including those around Whitechapel and associated with Queen Mary University of London. QMUL support the inclusion and promotion of both Whitechapel and the wider QMUL faculties for Life Sciences through the London Plan and welcome further engagement with GLA on their future aspirations for the development of a Life Sciences cluster at Whitechapel.

As part of their recent engagement with London Borough of Tower Hamlets in the Local Plan Regulation 19 Consultation QMUL sought the inclusion of a definition of ‘Life Sciences’ within the policy document. Similarly, we would suggest that the new London Plan include a definition within the glossary, similar in principle to the definition provided for MedCity as outlined above.

User:	Camden Town Conservation Area Advisory Committee

2. Sustainable development
We are concerned that the definition used is not the same as that used in the NPPF, and doesn’t include heritage.
We seek a revision to refer to the NPPF definition, and thereby to include heritage.

User:	Vital OKR

Many words and phrases, some used in a jargonistic / niche manner, that are key to understanding and applying the requirements of the plan, are not defined in this section. They should be. Some we noted are: Workspace, Consultation, Community, Local Community, Local Communities, Stakeholders, Cultural, Edge of Centre, Flexible Workspace, Industrial, Light Industrial, Local People, Optimise, Place?Making, Spatial Inequalities, Town Centre Uses, Town Centre Health Check, Transparently, Edge, Fringe, Underused Site, Neighbourhood. We request that a full review of the Definitions section be carried out following a full check?through of the Plan text.

User: North London Waste Plan

	Comment	Suggested change
General	“Secondary materials” is used often within the waste section and elsewhere in London Plan. There should be a definition in the glossary.	Add entry for secondary materials in glossary

User: Barnet Society

Para 4.6.5

We support the Mayor’s belief that public sector land can play a significant role in meeting affordable housing need, and would like to see such developments giving priority to key public service workers. But the definition of ‘affordability’ in the Glossary is insufficiently robust.

User:	London Sustainable Development Commission

- Clear definition of ‘decentralised energy’ and what solutions it includes within the Glossary.

User: Arup Building Engineering Team

We support that the Plan acknowledges the importance of the local microclimate but this statement would benefit from a clearer, stronger definition of microclimate and what topics it includes. Buildings should not adversely affect the local microclimate to the extent that conditions become unsuitable for the current or intended activities of the public realm. Microclimate should include, for example, wind, air quality, sunlight, daylight and noise. 'Microclimate' should be added to the list of definitions at the end of the Plan.

Wind is explicitly referenced in Policy D8 but adverse wind conditions are not only caused by tall buildings. The impact on levels of windiness can be affected by the geometry of the building, interaction with surrounding buildings and sensitivity of the public realm activities. Limiting reference to wind to the tall buildings policy could be interpreted as there not being potential adverse effects from buildings that are not considered to be tall.

User:	Chairs of Camden's Conservation Area Advisory Committees

Annex 3 Glossary
2. Sustainable development
We are concerned that the definition used is not the same as that used in the NPPF, and doesn’t include heritage.
We seek a revision to refer to the NPPF definition, and thereby to include heritage.

User: Historic England

Amend the definition of sustainable development to reflect how it is taken forward in the planning process

Amend the definition of sustainable development to refer to that set out in para 7 of the NPPF:

‘There are three dimensions to sustainable development: economic, social and environmental.

- **The economic role means contributing to a strong, responsive and competitive economy**
- **The social role means supporting strong, vibrant and healthy communities**
- **The environmental role means contributing to protecting and enhancing our natural, built and historic environment**

To achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system’

User:	Historic England
The definition of Outstanding Universal Value should be reviewed to ensure it is suitably comprehensive and precise. Historic England can assist with this.	

User:	London Friends of Greenspaces Network
Glossary	It is proposed there be a definition for ‘Parks’, and/or ‘Public Open Space’ - as set out in the Table 8.1 but not limited to that

User: Mx Beth Stewart

The definition of a brownfield site is very broad. It is “Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure.(https://www.designingbuildings.co.uk/wiki/Brownfield_land)

The listing and reclassifying of brownfield sites must be carefully monitored because this definition covers most sites. Misuse of this category is already creeping into the system with the loss of playing fields, allotments, green and open spaces and parks to the ‘brownfield’ category,

We look to the London Plan to protect built on land for uses other than housing. To ensure this we ask for further policy measures to be included in the London Plan. It is also important for the London Plan to use a Social Impact Assessment when deciding on change of use as in the case of brownfield sites

User: Lidl UK GmbH

Lidl considers that the reference to the ‘sequential approach’ in the Glossary should be revised and expanded in the following ways:

- Whilst Lidl appreciates that the existing text in the Glossary introduces the general principles of the sequential approach for all relevant land uses, the text needs to be expanded to acknowledge that out of centre locations may also be suitable in instances where there are no suitable and available in-centre or edge-of-centre sites and premises.
- Clarity is also needed in relation to what makes an in-centre location – i.e. sites and premises within the defined Primary Shopping Area in each ‘town centre’.

User:	London Borough of Camden
The Glossary should contain a definition of the term 'Circular Economy'.	

User:	Age UK London - a charity working with older Londoners

54. Glossary LINK TO POLICY CHANGE We believe that the glossary will benefit from the inclusion of the proposed definitions.

User:	Age UK London - a charity working with older Londoners

GLOSSARY

PROPOSED AMENDMENTS:

ADD DEFINITION OF ‘SOCIAL INFRASTRUCTURE’

ADD DEFINITION OF ‘SOCIAL ISOLATION’

ADD DEFINITION OF ‘AGE AND DISABILITY FRIENDLY CITY’.

‘INCLUSIVE NEIGHBOURHOODS’: ADD IN THE IMPORTANCE OF ‘SOCIAL INFRASTRUCTURE’ IN PROVIDING OPPORTUNITIES FOR SOCIAL INTERACTION

ADD TO ‘COMMUNITY ENGAGEMENT’:
‘....AND CAN INCLUDE FACE TO FACE, ONLINE AND VOLUNTARY SECTOR ENGAGEMENT’.

User: Gail Waldman

3C - major new housing developments to be truly sustainable and genuinely affordable

3C.1 In the Glossary the term 'affordable' covers social rent, affordable rent and intermediate housing. Each housing type should have separate entries in the Glossary. Within Policies and supporting text the three types of housing should each be mentioned, with reference to the Mayor's Viability SPG where appropriate.

User:	St Anne's Redevelopment Trust

- Community-led housing does not appear in the Glossary although it is referenced as such.

User:	Levitt Bernstein
If habitable rooms are to be referred to, and particularly if they are used within a metric (e.g. a measure of density or a way to asses like-for-like replacement of affordable housing) the word ‘habitable’ should be defined in the glossary.	

User:	Primrose Hill Conservation Area Advisory Committee

Annex 3 Glossary
2.Sustainable development
We are concerned that the definition used is not the same as that used in the NPPF, and doesn’t include heritage. We seek a revision to refer to the NPPF definition, and thereby to include heritage.

User:	Regent's Park Conservation Areas Advisory Committees

Annex 3 Glossary
2. Sustainable development
We are concerned that the definition used is not the same as that used in the NPPF, and doesn’t include heritage.
We seek a revision to refer to the NPPF definition, and thereby to include heritage.

Annex Two Inner and Outer London Boroughs

User:	London Borough of Brent
Brent is the densest Outer London borough1 by population and should be re-designated as an Inner London borough.	

User:	Harefield Tenants and Residents Association

1. HTRA fully supports the response of Hillingdon Council and echoes its call for better recognition of the different needs and circumstances of outer London Boroughs. Harefield would go further still, being on the outer fringe of an outer London Borough, characterised as semi-rural in many aspects rather than suburban. We do not feel that the Draft Plan takes sufficient account of the real diversity of environments and communities that are found within Greater London and are concerned that it focuses too much on approaches that are relevant to highly urban environments.

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

User:	Regeneration X

1.0.8 *Planning for mixed use development in all parts of London will spread the success of London's economy and create stronger communities*. We support the creation of mixed use developments but on its own this will not bring success to all parts of London. In addition, it must be understood that mixed use is more than having, say, a retail unit at the base of a residential block – it is localities which must be of mixed use, with a place having more than one function and having multiple uses spread and varying over different parts of the day. These uses must work together and must not harm nor conflict with each other.

User:	Joy Brown

1.0.8 Rebalancing the housing market is a national problem. It requires a sea-change in developer attitudes to profit (as so much housing development depends on private finance); a revocation of right to buy and the imposition of rent controls.

User:	Karl Brown
1.0.5 Asks the question what the purpose of economic growth actually is. it would be most welcomed to see an indication as to how and when this important question is to be addressed referenced in the main document.	

User: Pat Turnbull

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

The term 'good growth' should be removed throughout the London Plan on the basis that the type of growth described is generally only good for a small minority of Londoners.

The references to predictions of London's population to 2041 should be removed from the plan as the future size of London is impossible to predict so far into the future, and this prediction is used throughout to justify a type of growth – intensification, densification and height - which is generally harmful to the lives of most current Londoners.

User: L&Q

9. The London Plan must be clear in what ‘Good Growth’ will involve – The imperative to optimise development potential will mean development taking place at a scale that may feel unfamiliar to some local communities. The London Plan must be clear about this for the benefit of Londoners and decision-makers. This involves providing clarity about implications in terms of density and building heights. In this respect the ‘density matrix’ has provided a useful baseline. It should be retained but substantively revised to reflect the density levels required in order to meet housing need, especially at more suburban locations. If roughly half of referable schemes have typically exceeded the current matrix this is because there was a site-specific case for this. A revised matrix should accordingly draw from case studies in situ. The ranges will inevitably be revised upwards and so the previously identified minimums will increase. Explaining the implications of ‘Good Growth’ also means providing clarity about terms used in the draft London Plan. It is particularly important that the next draft of the London Plan is clear about what is meant by ‘character’. The current draft ascribes different meanings in different sections. This leads to a risk that decision-makers find it harder to justify a resolution to grant planning permission in circumstances where consultees assert harm to a peculiar and subjective definition of ‘character’. It is essential that the meaning of ‘character’ is addressed for the London Plan to encourage development and help decisions to be made more efficiently. This will almost certainly require the use of different terms across the Plan (e.g. ‘physical character’ or ‘cultural character’).

User: Keith Saunders

The importànce of trees and woodlands cannot be emphasised enough. They improve air quality, provide vital habitat for wildlife, much of which is disappearing from urban areas and aesthetically they help to brea? up views of endless buildings. Also, people feel better and more relaxed in wooded areas. I work as a conservation volunteer and any time spent in woodland makes me feel better in myself.

In the sections listed below (in the same order as they appear in the draft London Plan).

- Paragraph 1.3.3. Recommend an addition (in CAPS) to the following sentence: “Access to green and open spaces, including waterways AND TREES, can improve health, but access varies widely across the city.”
- Paragraph 3.9.5. I support the inclusion of “Protection for trees” as an issue in the amplification of potential negative impacts of large-scale basement development beneath existing buildings.
- Policy H1. Increasing housing supply. I recommend that Sentence B2)d is clarified so that “public sector owned sites” will not include woodland, parks and open spaces.
- Paragraph 4.2.9. I support the principle of “no net loss of overall green cover” as a result of small housing developments, and support “off-site provision such as new street trees” in order to achieve this principle. I recommend an addition (in CAPS) to the following sentence: "Loss of existing biodiversity OR GREEN SPACE, as a result of small housing developments, should be mitigated through measures such as the installation of green roofs, the provision of landscaping that facilitates sustainable urban drainage, or off-site provision such as new street trees in order to achieve the principle of no net loss of overall green cover. Rainwater attenuation features should be incorporated to achieve greenfield run off rates. LOSS OF ANY PUBLIC GREEN SPACE WILL BE COMPENSATED FOR WITH ALTERNATIVE ACCESSIBLE SITES.”
- Policy S4. Play and informal recreation. I support section B2)d, that residential development proposals for schemes that are likely to be used by children and young people should incorporate good-quality, accessible play provision for all ages, of at least 10 square metres per child that: “incorporates trees and/or other forms of greenery”.
- Policy G1. Green infrastructure. I support this policy, and subsequent narrative that mentions the important role of trees.
- Policy G5. Urban greening. I support this policy, including the recommended Urban Green Space Factor, and subsequent narrative that mentions the important role of trees. I support the inclusion of the role and weighting for woodland and trees in Table 8.2 - Urban Greening Factors. I recommend including a reference to Residential Development and Trees (Woodland Trust, 2015, woodlandtrust.org.uk/residentialdevelopments).
- Policy G6. Biodiversity and access to nature. I support this policy. I recommend that Sites of Metropolitan Importance and all ancient woodlands are added to the categories of planning applications that must be referred to the Mayor.
- Policy G7. Trees and woodlands. I support this policy. I recommend that Section B)1 is strengthened as follows (amendments in CAPS): “GIVE THE STRONGEST POSSIBLE protectION TO ‘veteran’ trees and ancient woodland, ESPECIALLY where these are not already part of a protected site”. I support the subsequent narrative on the role of trees, particularly paragraphs 8.71 – 8.73. I recommend referring London boroughs to guidance on ancient woodland and veteran trees: Planners’ manual for ancient woodland and veteran trees(Woodland Trust, 2017, woodlandtrust.org.uk/plannersmanual).

Please accept this my formal response to the consultation. I will look forward to hearing from you as the Plan progresss.

Chapter 2 Spatial Development Patterns

User:	London Legacy Development Corporation

In terms of specific sections:

Spatial Development Patterns

As above, as currently drafted the Plan lacks any detail about the significant opportunities that exist in and around Queen Elizabeth Olympic Park, which include the creation of new neighbourhoods and accompanying social infrastructure, new economic hubs at Stratford and Hackney Wick, and the introduction of new higher education, research and development facilities alongside space for major cultural institutions. It’s worth highlighting that Figure 2.7 in this section does not currently recognise the proposed District Centre at Bromley-by-Bow, as designated in the LLDC Local Plan in July 2015.

User: Thurrock Borough Council

Chapter 2 - Growth Corridors

Chapter 2 of the draft London Plan includes reference to Growth Corridors and Opportunity Areas. However whilst the approach to Opportunity Areas is set out in Policy SD1 and detailed in the following pages of the chapter there is limited reference to the function and purpose of Growth Corridors. The Growth Corridors are identified in Figure 2.1 and referenced in paragraph 2.1.6 without explanation of their function in relation to the spatial strategy of the London Plan. It is suggested that additional wording is included in supporting text to define the role and purpose of the Growth Corridors.

User:	Diocese of Southwark

The Diocese of Southwark supports the focus on key areas of development, and is targeting some of its own resourcces on the Opportunity Areas. However, the local experience of some churches has demonstrated that where too much resource is focused on a limited area, this can be to the detriment of healthy development nearby. The Mayor of London is urged to ensure the London Plan keeps a strong focus on sustainable and inclusive regeneration for all.

User:	Mr Peter Martin

The scale of intensification envisaged in the suburbs will be seriously detrimental to local communities, heritage, character and green space. The distinctive character and heritage of these areas is at risk from overdevelopment.

User: The Royal Parks

SD4 The Central Activities Zone (CAZ)

TRP notes that the CAZ includes The Regent's Park, Hyde Park, Kensington Gardens, Green Park and St James's Park, all managed by TRP.

TRP strongly supports the aspiration to maintain and enhance the distinct environment and heritage of the CAZ. Developments outside the CAZ footprint that can have a detrimental impact on the ambience and setting of the CAZ and so should be a relevant consideration in planning decisions.

TRP agrees that traffic can have a detrimental impact on the CAZ and supports measures to mitigate this.

User:	Putney Society

The Map seems to confirm that despite continuing intensive growth, Putney and neighbouring areas are expected to get by with a transport network significantly unchanged for the last century. We invite the author of this to try to board a train at Putney Station in the morning peak hours. In this respect we welcome the various statements that development be phased in line with the provision of infrastructure.

User: Telegraph Hill Society

Chapter 2: General comment and objection

In our view considerably more emphasis needs to be given to promoting offices, factories and other commercial premises close to where people live.

Whilst policies promoting Growth Corridors and Opportunity Areas are welcome and much needed, a greater emphasis should be placed on a wider distribution of business premises and less emphasis on the Central Activities Zone. Bringing employment and housing closing together would obviate the need for so much commuting, reduce the unproductive amount of time wasted commuting, reduce the demands on public transport (and hence the need for future investment therein) and reduce the need for car usage and ownership.

User: Eton Conservation Advisory Committee

CHAPTER 2: Spatial Development Patterns

It is a matter of concern that the diagrams in this chapter are so small yet so detailed that Fig 2.1; The Key Diagram and Fig 2.16: CAZ Diagram delimit opportunity areas for major commercial and residential growth extending into the Conservation Areas of Regents Park and surrounding Camden Town northwards into the lower slopes of Hampstead. It is essential that the text makes clear that boundaries of Opportunity Areas (in this case Euston and Kings Cross) and Town Centres (in this case Camden Town) are clearly defined and designated in Borough Plans to allow consultation/ participation from local groups and residents.

User:	Eton Conservation Advisory Committee

We would raise serious concern over:

1. ***The quality of the diagrams e.g. Fig 2.16 CAZ Diagram.*** These provide a level of detail which is unclear at such a small scale and inappropriate for the London Plan. **Areas for growth or change should be identified and defined at borough/local level in consultation with local groups and community.**

User:	EngineersHRW

Policy SD4 The Central Activities Zone (CAZ)

SD4. Add clause at O: **New developments in the CAZ should enhance the existing tight urban grain and stand-alone ‘object’ buildings within it should be actively discouraged. All buildings within the CAZ should where possible connect and make contact with their immediate neighbours.**

User:	EngineersHRW

Policy SD8 Town centres: development principles and Development Plan Documents

Clause SD8-A.

Note: A town centres first approach is strongly supported (but this should not

mean new clusters of tall buildings in these locations)

User:	EngineersHRW

Policy SD8 Town centres: development principles and Development Plan Documents

Clause SD8-B.4. Add after the first sentence: **This should not mean new clusters of tall buildings in these locations.**

User:	EngineersHRW

Policy SD10 Strategic and local regeneration

Clause SD10-A. Add further sub-clause **(3): Seek to identify and support opportunities for include a wide range of contributors in their regeneration areas, development plans and Opportunity Area Planning Frameworks with the explicit aim of creating, maintaining and enhancing diverse communities.**

User: Royal Borough of Kensington and Chelsea

Growth Corridors and Opportunity Areas

Figure 2.1 – The Key Diagram does not show a station at Kensal or even the potential for a station at the site. A station at Kensal Canalside Opportunity Area is a key component of the Council's strategy to ensure the delivery of much needed housing in the Royal Borough, which will optimise housing development on the site and act as a catalyst for wider regeneration in North Kensington. The Council continues to work with Network Rail and Transport to London to seek to deliver a station on the site. The Council believes that the GLA should support the principle of a new station at Kensal and recognise the contribution this station can make to unlocking the potential for more homes to be built within Kensington and Chelsea.

Opportunity Areas are now grouped by transport-defined growth corridors except for central London. This may be logical for outer London but leads to Old Oak Common and Park Royal being in the HS2 / Thameslink corridor and Kensal in the Heathrow / Elizabeth Line West corridor even though they abut. Earl's Court is also identified as part of the Heathrow / Elizabeth Line West corridor, which has very little to do with the area's function.

The Annex in the 2015 London Plan which outlines how the policy should be applied to specific Opportunity Areas has been removed. This included the text 'in some areas the transport system would not currently support this level of growth and developer contributions may be required to underpin enhancements', this wording provided assurance for this borough in relation to Kensal Canalside Opportunity Area and the need for infrastructure contributions.

User:	Royal Borough of Kensington and Chelsea

2.1 Policy SD1 Opportunity Areas (OAs)

Paragraph 2.0.4 - The Council welcomes the explicit recognition that ‘Infrastructure is key to this delivery and will require major investment in transport’ in paragraph 2.0.4. Kensal Canalside Opportunity Area is Kensington and Chelsea’s last remaining large brownfield site and the most important to delivering new housing over the next twenty years. Transport investment in the form of a Crossrail Station is key to delivering the strategic goals of more housing and wider regeneration benefits in North Kensington. The Council seeks the GLA’s support for a Crossrail Station in London Plan.

User:	Royal Borough of Kensington and Chelsea

2.1 Policy SD1 Opportunity Areas (OAs)

Policy SD1 A 4 – The Council welcomes the draft policy framework for OAs, particularly the commitment within Policy SD1 A4 that the Mayor's agencies work together to promote and champion OAs and identify those that require public investment and intervention to achieve their growth potential. The Council's strategic objective is to promote a high quality residential-led development at Kensal Canalside, which requires a Crossrail station to unlock the full potential of the site. The Council looks forward to working with the Mayor and his agencies to deliver a station at Kensal and seeks explicit support for this goal within the text of the London Plan.

User:	Royal Borough of Kensington and Chelsea

2.1 Policy SD1 Opportunity Areas (OAs)

Policy SD1B.6)- We are concerned by the removal of the wording ‘tested as appropriate through Opportunity Area planning frameworks and/or Local Development Frameworks’ which appears in Policy 2.13 Opportunity Areas and Intensification Areas of the current plan. The guidelines for housing and employment capacity are identified as indicative so they must be tested before they can be met or exceeded.

User: Royal Borough of Kensington and Chelsea

2.1 Policy SD1 Opportunity Areas (OAs)

Figure 2.10 – Although Kensal Canalside is recognised in Figure 2.10 (number 7), there is no text to accompany or to expand on the Kensal Canalside Opportunity Area. In the adopted 2016 London Plan, this text was found in Appendix 1, Table A1.1, number 18. The Council questions where this is now found, and highlights that a section on description is required within Elizabeth Line West (2.10) because this is very helpful in setting the principles for the development particularly emphasising that improved public 3

transport accessibility being a major determinant of the final scale of development. The Council recommends that Kensal Canalside is also recognised in Figure 2.8 as it is adjacent to, and logically linked, with Old Oak Park Royal Opportunity Area. Similarly, Earl's Court and West Kensington Opportunity Area is shown in Figure 2.10 but there is no accompanying text. This text was found in Appendix Table A1.1 number 10 in the adopted 2016 London Plan.

Kensal at present has parts that are very poorly connected. If the Council is to achieve a minimum of 3,500 new housing units for the OA, lower density housing is not an option. Public transport to the western parts of the OA must be improved. The road network at Kensal has very limited capacity. It seems likely that highway improvements will be required. In that context we would welcome a car free development as long as appropriate public transport options are available as this would temper the future pressures on the road network.

The onus is on the Mayor to provide or secure improvements in public transport access to the area. We would support car free in this context.

User:	Royal Borough of Kensington and Chelsea

2.5 Policy SD7 Town centre network

The Council supports the promotion of comparison goods retailing in major town centres. The hierarchy is in line with our Consolidated Local Plan policy which looks to support local shopping on a day to day basis.

User:	Royal Borough of Kensington and Chelsea

2.6 Policy SD9 Town centres: Local partnerships and implementation

The Council welcomes the explicit support for the use of Article 4 Directions to protect office and light industrial uses, from unfettered changes of use to residential. We concur with the Mayor’s view that such Directions many be needed to sustain the vitality and viability of our town centres, and the diversity of uses across the borough.

User: Royal Borough of Kensington and Chelsea

2.7 Policy SD10 Strategic and local regeneration

In relation to Policy SD 10 and 2.10.7, the RBKC Draft Local Plan identifies a number of places within the borough which have their own chapters and are covered by an overall umbrella ‘place’ policy. These areas are where significant change is expected (Strategic Regeneration Areas) or our larger town centres.

2.10.3 The ‘focus on…the GLA family and other stakeholders to ensure these areas benefit from investment in strategic infrastructure’ is supported, particularly in relation to the strategic infrastructure that will be required to bring forward optimal development at Kensal Canalside Opportunity Area.

The Council supports the view that ‘in order to be effective in improving the lives of those most affected by inequality, regeneration initiatives must be undertaken in collaboration with local communities, involving a broad spectrum of groups and individuals, to develop a shared vision for the area.’ Our Council Leader has given this commitment in relation to Council led regeneration in the borough saying, "Our councillors and senior executives will not decide this for residents but with residents. We will rethink all our plans for regeneration in the borough. We will work with residents to create new plans and you will vote on any results – if people vote against then we’ll go back to the drawing board together and start again."

User: Bracknell Forest Council

Infrastructure

The Plan commitment to work with South East councils and other partners to secure mutual benefits on growth and infrastructure (para 2.0.5, Policy GG5/para 1.4.8) is welcomed. There is a significant infrastructure funding gap across London and the south-east which should be a shared priority to help secure economic prosperity.

The inclusion of the initial 13 Wider South East strategic transport infrastructure priorities is supported as is the recognition that these 13 transport priorities are needed to ensure existing growth plans can be delivered and address current shortfalls in transport provision.

The Plan should continue to be clear that Wider South East transport priorities are not being planned as corridors for extra growth from London. South East authorities' growth plans are for them to decide on and the London Plan should not seek to influence them unduly.

The Plan opposes the expansion of Heathrow if additional noise or air quality harm would result, and sets out that support for additional aviation capacity, including improved surface access (Policy T8). The Plan should emphasise that western and southern rail access improvements to Heathrow are already necessary to tackle existing transport problems, and are not just needed to enable the expansion of Heathrow.

User: The Royal Society for the Protection of Birds (RSPB)

Planning positively for biodiversity at the landscape scale

The London Plan should provide a strong spatial framework to plan for biodiversity at a landscape scale and it is essential that Local Plans support its implementation. In our view, the Draft London Plan does not currently provide this strategic framework. This is a missed opportunity to genuinely plan for nature, to achieve biodiversity net gains at scale and to set an ambitious framework for London Boroughs to follow. This would be in keeping with recent commitments in the Defra 25 Year Environment Plan on strengthening planning policy around biodiversity net gains and developing a Nature Recovery Network and is already established in policies in the NPPF (see, for example, paragraphs 114 and 117). We strongly recommend that this be addressed before the London Plan is adopted.

In order to implement the strategic framework at a local scale, London Boroughs will need to be appropriately resourced.

A 2015 study by the RSPB and The Wildlife Trust known as Nature Positive Local Plans highlighted that more needs to be done to significantly and cost effectively improve the performance of local plans in relation to biodiversity protection and enhancement. The findings can be found here.

There are positive examples of local planning authorities doing the right thing6. However many local plans miss the opportunity to set out a positive vision of what they might do for the natural environment, particularly at a landscape-scale – less than a third of Core Strategies present a clear strategic approach to planning for biodiversity and only 20% of local plans plan strategically for biodiversity across boundaries. If London Boroughs are to reverse this trend they will need strong strategic policy direction in the adopted London Plan and have access to independent ecological expertise. The draft London Environment Strategy (LES), p163, noted that as public-sector budgets have been prioritised to fund core statutory services, the amount of expert advice to work on ecology and natural environment issues at the borough level has fallen.

To ensure boroughs can properly consider biodiversity as part of strategic planning, when reviewing development applications and to support monitoring and enforcement, improved access to independent ecological expertise is clearly needed. An option could be to develop an Ecology Unit at a pan-London level to provide support to London Boroughs.

Spatial Development patterns (Chapter 2)

Despite covering nearly 20 per cent of the city7, it is surprising that legally protected wildlife sites and the SINCs network are not currently spatially represented in the London Plan. Legally protected wildlife sites and SINCs form the backbone of London's biodiversity, a London-wide ecological network that protects species and habitats and helps them to adapt to external pressures such as climate change and urbanisation. SINCs also provide considerable benefits to Londoners such as improved mental and physical wellbeing through access to nature.

The London Plan should include specific, comprehensive and up-to-date maps of legally protected wildlife sites, the SINCs network and priority habitats to inform plan-users and properly guide development decisions. Given the spatial significance of the network, a brief description of its role and importance should be included within Chapter 2: Spatial Development Patterns, for example, within paragraph 2.0.2.

In the same way as Opportunity Areas are identified for the growth and regeneration potential, the London Plan should also identify and map opportunities to extend/restore/buffer and strengthen the connectivity between legally protected wildlife sites, the SINCs network and wider habitats of conservation importance (as set out paragraph 117 of the NPPF). There is a crucial need for updated Biodiversity Opportunity Mapping to support the London Plan. These could be in addition to or supplement the update of the Supplementary Planning Guidance on the All London Green Grid – but importantly there is a need for updated Biodiversity Opportunity Mapping, illustrating legally protected wildlife sites, the SINCs network and underpinned by habitat data to support the final London Plan.

The scale of development proposed in the draft London Plan will impact not only on London but also the wider South East. Policy SD2: Collaboration in the Wider South East recognises the need to work across planning boundaries and identifies the strategic issues to collaborate on. We recommend that green infrastructure and ecological networks are added to list of environmental factors in Draft Policy Point E where partners should work together.

User:	The Royal Society for the Protection of Birds (RSPB)

The London Plan should include specific, comprehensive and up-to-date maps of legally protected wildlife sites, the SINCs network and priority habitats to inform plan-users and properly guide development decisions. Given the spatial significance of the network, a brief description of its role and importance should be included within Chapter 2: Spatial Development Patterns, for example, within paragraph 2.0.2.

(Please see full document for more detail)

User: London School of Economics

The ordering of the draft Plan gives priority to spatial development patterns, which are discussed at substantial length (ahead of related issues about housing, economy, infrastructure, design and transport). However the discussion is couched almost entirely in terms of the specifics of opportunity areas, town centres etc., with very little on the underlying strategy – and nothing on why the specific choice among options was made.

There is clear evidence from the Scoping Report for the IIA (GLA, 2017) and then from its report (Arup, 2017) that spatial options were formulated and considered within GLA. The draft Plan is based on the option characterised as ‘sustainable intensification’ – which in essence sticks with the ‘compact city’ philosophy of the two previous London plans, but pushes that rather further (‘sustained intensification’ would be a more informative label). There is no indication in published GLA reports as to why this choice was made.

From the (very brief) discussion in the Arup report, supporting the GLA preference, the distinctively positive feature of this option appears to be that it could satisfy the level of development required – on its own, without need to engage with any Green Belt release inside London, or collaborative development with partners outside. Neither Arup’s judgements nor the GLA’s published response are at all specific about this critical point. But since incorporation of either of these other sub-options must have added to any expectations about achievable levels of development, the clear implication is that the ‘sustainable intensification’ option – as now embodied in the draft Plan – was confidently expected to deliver the required level of development, including (importantly) the required delivery of additional housing. This point is clearly critical in relation to the choice of the ‘sustainable intensification’ option as the basis for the spatial development strategy, if not the only reason for favouring it over specific alternatives (given e.g. the Mayor’s explicit opposition to any development on Green Belt land within London). But this point is not actually clarified within the Plan or its supporting documents.

We note positively that the SHLA (GLA, 2017b) does provides persuasive evidence that the chosen strategy is capable of supporting a housing supply capacity (for the first decade of the Plan’s operation) very close to the SHMAR’s calculation of objectively assessed need (GLA, 2017c). However, although compliant with current NPPF methodologies, objectively assessed capacity is simply not the same thing as (objectively forecast) delivery of extra housing units – either in principle or (as past experience in London indicates) in practice.

We note that the capacity estimates prepared for this Plan are substantially higher than those derived in the (generally comparable) 2013 SHLAA. For large sites, the increases are in the range of 30-35%. Our understanding is that this increase largely reflects changes in the density assumptions applied to such sites between (in the earlier round) estimates in the middle if the relevant density ranges prescribed in the Plan's density (or SRQ) matrix to (in the current round) ones reflecting those arising in practice in planning approval cases (at/above the maximum values prescribed in the Plan, with a mark-up in Opportunity Areas etc.). We welcome this shift to greater realism (consistent with recommendations in a density research study for the London Plan Team (LSE, 20163) expected to have broadly this scale of effect). Moreover, since it was based on past practice, it does not imply actual increases in densities as compared with the past, at either approval or delivery stage. It raises capacity estimates without necessarily having any effect on the scale or rate of delivery.

It is important to note that in relation to large sites, the higher capacity estimates are not grounded in projected impacts from policy changes (in the Plan or the Housing Strategy). For small sites however, where the basis of estimation is statistical, rather than based on identified plots, a very much larger proportionate increase in capacity is explicitly based on implementation of the Plan's small sites policy, in relation to infill and conversions. We welcome these policies, which could at least in principle have real and significant impact on housing delivery as well as capacity. However there is considerable evidence that there are more fundamental reasons for the demise of smaller builders and in the absence of evidence, the assumption that a quintupling of output from such sites could be achieved (from 3.7k p.a. average over the last 8 years to 18.7 p.a.) over the first decade of the Plan appears wholly incredible. At the least the impact of these policies needs careful and transparent monitoring.

The (strongly) implied treatment of capacity estimates for the next decade as indicative of the likely 'scale of development' and delivery of additional housing within London, under the sustainable intensification model, suggests that we could expect to see an increase of some 150% in housing completions. Of this the small sites (where capacity and delivery are quite closely related) are expected to contribute 15k, on the basis of the Plan's specific policies for small sites. The balance (an additional dwellings 25k p.a.) must come from large sites, involving an increase of about 160%. Very little of that might be expected as a consequence of the higher capacity estimates4. This suggests that significant increases are anticipated as a result of policies in the Plan and Housing Strategy which are designed to enhance delivery rates. Alternatively - or in addition - some may be expected to come from permitted development, a national policy which is currently resulting in large numbers of dwellings based outside the individual planning permission structure and which the Mayor deplores. As discussed further below in relation to the Housing section of the Plan, no estimates or evidence have been offered of the scale of effects that might be expected, nor of the extent to which these depend upon additional powers and/or finance becoming available particularly to incentivise build-out rates on large sites.

Delivery from both big and small sites is likely to continue to fall well below that implied by capacity estimates and hence also below objectively assessed need. An implication is that housing targets for various areas within London may be quite unrealistic in relation to what boroughs can achieve simply on the basis of a more accommodating attitude to residential development/densities. Other policies, both national and local, are required.

User: Newham Union of Tenants

CHAPTER 2 – SPATIAL DEVELOPMENT PATTERNS

This chapter fails to provide a strategic framework for development across London that might deliver sustainable communities and lifetime neighbourhoods.

Grass roots evidence suggests huge detriment in large scale development areas and at the edges of them, relating to rising housing costs and actual or potential displacement of local communities, shops and services that have sustained lower income communities in the past. There is evidence in the London Poverty Profile of movement of lower income households from inner to outer London. There is a question as to whether some changes in poverty indicators are as a result of displacement of lower income households from London.

Uncertainties relating to London's already dysfunctional housing market, the impact of Brexit, insufficient funding to support the development of housing that will meet the evidenced need of households with below median income levels as well as essential social infrastructure suggests that the plan is unsound.

Alternatives, such as the such as the Just Space's community plan, need to be properly considered.

There is a total lack of evidence / monitoring of Opportunity Areas to assess whether they are delivering the kinds of development required to meeting needs across income levels in London. This is the kind of evidence that is required to demonstrate that they do offer the best possibilities of delivering sustainable development that is - living within the planet's environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using sound science responsibly.

We suggest that this chapter should instead focus on promoting lifetime neighbourhoods as a model for sustainable development across London. It should assert that all Londoners should have the opportunity to enjoy a good quality environment in an active and supportive local community. Ensuring this means planning for lifetime neighbourhoods in which communities are empowered and in which local shops, social and community facilities, streets, parks and open spaces, local services, decent home, jobs and public transport are affordable and accessible to everyone now and for future generations.

User: London Borough of Ealing

We acknowledge the greater role to be played by boroughs like Ealing in delivering growth. The draft plan says that: “If London is to meet the challenges of the future, all parts of London will need to embrace and manage change. Not all change will be transformative – in many places – change will occur incrementally. This is especially the case in outer London, where the suburban pattern of development has significant potential for appropriate intensification over time, particularly for additional housing” (Para 2.0.3). In this respect Ealing has already embraced change and takes a highly pro-active and positive stance on growth.

We are indeed fortunate that our borough presents huge potential and opportunities for growth and development across a multitude of neighbourhoods and development sites. We have always sought to optimise the potential for development embracing the possibilities of high quality mixed use developments built at levels that often exceed the existing London Plan density matrix yet are still sustainable.

We are also proud of our successful track record in delivering small scale developments on sites that have not been formally allocated in our development plan. Historical development monitoring data for the past decade is proof of our efforts to support appropriate intensification in the suburbs particularly in areas of high public transport accessibility (either now or in the future). We look at each development proposal on its individual merits and we do not have restrictive policies that, for example, seek to prevent conversions of larger dwellings or build on gardens or on back-land sites.

We have also sought to use our powers both as a land and property owner to break down the barriers to housing delivery by being pro-active about land assembly. We are not afraid to resort to compulsory purchase, if there is no viable alternative

User: London Tenants Federation

CHAPTER 2 – SPATIAL DEVELOPMENT PATTERNS

2.0.1 This chapter fails to provide a strategic framework for development across London that might deliver sustainable communities and lifetime neighbourhoods.

2.0.2 Grass roots evidence suggests huge detriment in many of the large-scale development and regeneration areas and at the edges of them, relating to rising housing costs and actual or potential displacement of local communities, and shops and services that have sustained lower income communities in the past. There is evidence in the London Poverty Profile of movement of lower income households from inner to outer London. There is a question as to whether some changes in poverty indicators are as also a result of displacement of lower income households from London.

2.0.3 There is a total lack of evidence / monitoring of Opportunity Areas to assess whether they are delivering the kinds of development required to meet the needs of all 5 Londoners. Full evidence that is required to demonstrate that they do offer the best possibilities of delivering sustainable development that is - living within the planet's environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using sound science responsibly. (NPPF)

2.0.4 We propose that that this chapter should instead focus on promoting lifetime Neighbourhoods as a model for sustainable development across London.

2.0.5 The concept of Lifetime Neighbourhoods was first introduced in 2007 by the International Longevity Centre UK working with DCLG in 2007 – which describes Lifetime Neighbourhoods as those that offer everyone the best possible chance of health, wellbeing, and social, economic and civic engagemen**t regardless of age.**

2.0.6 The government later published a strategy called 'Lifetime Homes and Lifetime Neighbourhoods in 2008. The coalition government commissioned the University of York to identify examples of how the idea of Lifetime Neighbourhoods were being developed and taken forward – which was finally published in 2011. LTF had produced its own definition which unusually included resident engagement and empowerment and University of York researchers included this in the DCLG publication.6

2.0.7 LTF members presented our definition and a diagram produced by the University of York researchers at the at the EiP of the 2011 London Plan. Although no policy on Lifetime Neighbourhoods was included in that initial 2011 London Plan it was later included in alterations to the London Plan and included sections of the LTF's summary definition – "all Londoners should have the opportunity to enjoy a good quality environment in an active and supportive local community. Ensuring this means planning for lifetime neighbourhoods in which communities are empowered and in which local shops, social and community facilities, streets, parks and open spaces, local services, decent home, jobs and public transport are affordable and accessible to everyone now and for future generations."

2.0.8 We argue that this is not only a very important policy to have in the London Plan (having been removed in this draft) but that it offers a good way of delivering sustainable development as required by the NPPF.

User:	London Borough of Hounslow

The approach taken by the plan in Chapter 2 (Spatial Development Patterns) closely reflects Hounslow’s emerging Local Plan reviews which seek to deliver a significant increase in new homes and employment, by taking a comprehensive approach to challenging areas, to create places that people will enjoy working, living and choose to stay throughout their lives.

User:	London Borough of Hounslow

For these reasons, we strongly support and will aim to meet the increased 10-year housing target as set out in Chapter 4, and welcome the two Opportunity Areas (Heathrow and Great West Corridor) adopted in Chapter 2, as part of the Elizabeth Line West Corridor, to deliver a total of 20,500 new homes and 25,000 new jobs and we look forward to working with yourself to bring these forward rapidly through Opportunity Area Planning Frameworks.

User: Create Streets

An inspiring and popular vision. Where should development be? And what should it be? Create Boulevards, Elizabeth Towns and Thames Towns.

Relevant policies:

SD1 – SD10: Chapter 2 Spatial Development Patterns (P.25-96)

Our spatial vision for the future of London needs to become profoundly more inspirational about where our new development will be and what it will be. Chapter two of the London Plan sets out where much (though not all) development can come from. However, these sites need to be linked together with a greater and more comprehensible focus on what they will be and how they will look. We suggest three unifying themes to capture the potential to **banish boxland** and build **'London-like neighbourhoods**.'

- Elizabeth Towns: a populist programme for a series of medium-rise, high density traditional mixed-use town centres on former boxland along the new Elizabeth Line with their own distinctive, popular and beautiful aesthetic and walkable, finely-grained urban form. This will be particularly relevant in places such as Ilford

- Thames Towns: a populist programme for a series of low-rise, high density traditional mixed-use towns along the banks of the Thames Estuary with their own distinctive, popular and beautiful aesthetic and walkable, finely-grained urban form. Thames Towns are not built from towers, but nor are they sprawling car-dependent suburbia.***5***

- Create Boulevards: a partially community-led programme for the populist beautification and intensification of London's arterial roads with more trees and a range of beautiful, popular medium-rise developments with pre-set designs agreed by local communities to permit faster higher development of more homes.6 This should include transport interventions such as trams into central London, as well as Banning non-electric private traffic into zone one and parts of zone two from several years into the future.

5 See http://dev.createstreets.com/front-page-2/campaigns-copy/thames-towns/ for more details.

6 See http://dev.createstreets.com/create-boulevards/ for more details.

User:	London Borough of Haringey

In respect of Opportunity Area 14, this should be referred to as ‘Wood Green’. Please delete reference to Haringey Heartlands to avoid confusion with the Council’s new policy framework for this area.

User:	Environment Agency

We note the Mayor’s growth proposals. The identification of growth corridors, and the clustering of Opportunity Areas encourages a strategic approach to be taken to identify integrated solutions to environmental infrastructure delivery. This could be developed in the Plan. We will continue to support the Mayor’s plans for infrastructure delivery by being part of the High Level Infrastructure Group, and the Infrastructure Coordination Unit.

User:	Environment Agency

We consider that the environment is currently under-represented in the policy objectives for growth corridors and Opportunity Areas. Communities' resilience to climate risks should feature in the text as an objective of 'good growth', and to support policy GG6.

User: Environment Agency

Supporting London’s Growth, page 32 on

We consider that the environment is not fully represented in the text pertaining to individual Opportunity Areas, and that it would help ensure ‘good growth’ to identify both environmental risks and opportunities within the text, including the opportunities for the consideration of a strategic approach to environmental infrastructure provision. For example, we note that the Regional Flood Risk Assessment which supports the Plan, identifies for each Opportunity Area where there are actions that contribute to the delivery of the Thames Estuary 2100 Plan, and where an integrated water management study may be appropriate.

Recommendation:

Explanatory text, page 32 on. We recommend that environmental risks and opportunities are included within the text for the Opportunity Areas, such as, assessing the potential for integrated water management solutions, and to manage flood risk. We can offer our help with this. Please also refer to our response to the draft Regional Flood Risk Assessment.

User: Save Swiss Cottage

CHAPTER 2 – SPATIAL DEVELOPMENT PATTERNS

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Alternatives, such as the such as the Just Space's community plan, need to be properly considered. There is a total lack of evidence / monitoring of Opportunity Areas to assess whether they are delivering the kinds of development required to meeting needs across income levels in London. This is the kind of evidence that is required to demonstrate that they do offer the best possibilities of delivering sustainable development that is - living within the planet's environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using sound science responsibly. We suggest that this chapter should instead focus on promoting lifetime neighbourhoods as a model for sustainable development across London. It should assert that all Londoners should have the opportunity to enjoy a good quality environment in an active and supportive local community. Ensuring this means planning for lifetime neighbourhoods in which communities are empowered and in which local shops, social and community facilities, streets, parks and open spaces, local services, decent home, jobs and public transport are affordable and accessible to everyone now and for future generations.

User:	London Borough of Bromley

Bromley supports the recognition of the value of open spaces and the focus on previously developed land. However, there is limited capacity for intensification of suburban areas without detrimental effects upon local communities, heritage, character and green infrastructure. It could also lead to a loss of much needed family housing and necessary amenity space for residents, particularly children. Intensification in areas without high levels of public transport would lead to additional pressure on the road network. This strategy does not accord with Para 1.2.7 which recognises the benefits of “distinctive character and heritage”.

User:	London Councils

The policies within this chapter can be mainly supported by boroughs. Opportunity areas, growth areas and housing zones are identified collaboratively with London's boroughs, which are keen to use these areas to carry out large scale regeneration and maximise the delivery of market and affordable housing.

Policy within this chapter demonstrates that the achievability of proposed policies set out in the draft London Plan hinges on ensuring the delivery of large scale infrastructure projects such as CR2 and the Bakerloo line extension. Concerns on deliverability should these projects be unfunded is expressed above.

Given the extent of London's expected population growth and its status as an economic hub which draws in commuters from surrounding areas, collaboration with the WSE is essential.

User: HFFTRA

CHAPTER 2 – SPATIAL DEVELOPMENT PATTERNS

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There is a total lack of evidence / monitoring of Opportunity Areas to assess whether they are delivering the kinds of development required to meeting needs across income levels in London. This is the kind of evidence that is required to demonstrate that they do offer the best possibilities of delivering sustainable development that is - living within the planet's environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using sound science responsibly.

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User: Camden Civic Society

Intensification in housing.

We recognise the urgent need for more housing units, particular social housing. But we are aware that traditional London terrace housing, which charactarises southern and mid-Camden, already provides the potential for good density if still used as or reverted to housing. We also believe that council estates within Camden, given the much larger size of the individual buildings here, including a relatively large number of ‘tower blocks’, already provide a good dense ratio of floorspace to open space.

But the term ‘intensification’ is equivocal in our view, and likely to become debased, as we believe ‘regeneration’ already has. We agree that there is much scope for new housing for example above retail sites, or sites with a commercial or service function no longer needed. Redundant low-rise buildings along main roads, for example, shops and petrol stations set back along major roads, are appropriate for additional housing (we make this point in the expectation that motor traffic is due in the near future to become dramatically less polluting than at present).

But we are worried about intensification within areas already long devoted to housing. Camden has large areas of suburb-type development in the north and west of the borough. These could be considered to be covered by Policy 2.0.3: where it is said that ‘*the suburban pattern of development has significant potential for appropriate intensification overtime, particularly for additional housing’*

At a recent meeting of the London Forum of Civic and Amenity Societies, societies from outer
London expressed their view that this clause represents ‘a declaration of war’ on the suburbs. We wish to express our solidarity with them, and urge the recognition that the London suburbs are as characteristic of London as the inner city terraces, and greatly contribute to London being such a pleasant city to live in. We would be very sorry to see very green areas built over in the expectation of a continued rapid rise in population which may in fact already be very much slowing down.

We would like that the contribution of well-established large gardens and mature trees to species diversity and air quality properly valued, even where these gardens are private.

User: London Borough of Hillingdon

The Council strongly objects to the provisions of paragraph 2.0.3, which states that the suburban pattern of development in outer London has significant potential for appropriate intensification. The phrase 'appropriate intensification' is not explained, however it is assumed that it refers to the Mayor's policy on the development of small sites.

As noted elsewhere in this response, the Council is extremely concerned that the Mayor's policy on small sites will lead to irreparable harm to the character of suburban areas in outer London boroughs like Hillingdon. A vague statement of this nature will do little to address housing needs in a managed way and only serves to support inappropriate windfall development in suburban areas.

By its nature, windfall development cannot be managed through the allocation of sites. Whilst there may be limited scope for residential development on vacant sites, this paragraph should be balanced against the need to preserve the character of suburban areas in outer London. These areas are as much a part of London's urban grain as the intensely developed central areas and form an important buffer between rural areas outside of London.

User:	London Borough of Enfield

1) The Mayor needs to use the duty to cooperate to seek better cooperation from Wider South East authorities that are key stakeholders in delivering Opportunity Areas and Growth Corridors just beyond their boundaries, in order to help them fulfil their growth potential. For Enfield the incremental growth assertion of outer London boroughs will not necessarily deliver the step change Opportunity Areas and recognised Growth Corridors require.

2) Needs to be greater flexibility in the types of uses within SIL that is located within Opportunity Areas. Local authorities through their local plans are better placed to specify employment sectors and types best suited to securing regeneration within these areas including setting a framework for co-location. This would include identifying uses compatible with bringing forward new homes.

User:	London Borough of Harrow

London Borough of Harrow is not identified as a benefiting from significant infrastructure investment such as Crossrail.

A number of policies relate to encouraging development/intensification where there's future public transport provision, however, it is difficult for policies to encourage 'good growth' where infrastructure is not already present — especially if those 'potential' improvements do not eventuate. Approving planning applications where there is no (or poor quality) physical infrastructure on the basis of potential infrastructure is not considered sound planning practice. [In the main, Harrow does not benefit from any significant planned infrastructure improvements, as summarised in Table 10.2].

User: Maldon District Council

Chapter 2 Spatial Development Patterns

The Plan is silent on the specific impacts on parts of Essex adjacent and within the wider strategic growth corridors. It is not clear therefore, what impact these will have on West Essex and South Essex respectively, and the indirect impact on the rest of Essex. This is particularly important given the risks to achieving London's housing targets – see below.

As far as Essex is concerned the Thames Gateway (including ports), the Lower Thames Crossing, A12 and M11 corridors are in the list of 13 Initial Strategic Infrastructure Priorities. The A14 from Felixstowe to the Midlands is included, but there is no inclusion of east to west links across Essex. Improvements in east west links across Essex, as promoted through the upgrade of the A120, for instance, will help relieve pressure on the M25 and provide better access to other parts of the wider London economic region and London infrastructure such as the M11 and Stansted Airport.

User:	London Borough of Havering

Havering is very concerned that the draft London Plan identifies that ‘the suburban pattern of development has significant potential for appropriate intensification over time, particularly for housing.’ As addressed in Annexe 1, the approach in the draft London Plan towards development of small sites will greatly erode the established character and appearance of Havering. There is little capacity for intensification of suburban areas without detrimental impacts on local communities, heritage, character and green infrastructure. It will also lead to a loss of much needed family homes and amenity space for residents.

User: London First

Figure 2.1 and General Approach to growth
We agree with the Plan's approach to focus growth on major investment in infrastructure projects, but more detail should be provided as to how these major infrastructures will be financed and delivered. We welcome recognition at paragraph 2.1.6 that OAs should not be planned in isolation. The Plan assumes that major transport projects, such as Crossrail 2 and the Bakerloo Line extension, will go ahead as proposed; while we agree that it is prudent to plan for growth associated with these major transport infrastructure projects, funding has not yet been confirmed and further, the anticipated timescales for delivery of these projects could be delayed. The Plan should also clarify whether housing and jobs targets for OAs are predicated on the delivery of these infrastructure projects. The Plan should acknowledge that such delays might occur or the risk that these projects might not happen and provide an alternative plan for these scenarios.

User: John Innes Society

CHAPTER 2. STRATEGIC DEVELOPMENT AREAS OVER NEXT 10 YEARS.
WIMBLEDON OA AND CROSSRAIL 2.

Wimbledon is the nearest Town Centre to most of Merton Park but the proposals for Crossrail 2 so far, both to the Town Centre and its hinterland, have been far more damaging than justified by the longer term benefits.

For this reason we object to 2.1.25 as drafted. The promotion of Crossrail 2 in and around Wimbledon must not be at any cost. We are extremely interested in the latest suggestion that Crossrail 2 should start from Clapham Junction, as that would provide much better connectivity to a wider area than starting it from Wimbledon as well as reducing the project costs considerably.

User:	Neighbourhood Planners

Add wording shown in **bold.**

The London Plan has a clear focus on delivery – something that will require all stakeholders to work together to unlock sites and drive the right sort of development. Infrastructure is key to this delivery and will require major investment in transport, with Opportunity Areas clustered into growth corridors; and proper planning of utilities and communications capacity and the social infrastructure that supports the day-to-day lives of Londoners, well in advance of new development. Opportunity Area Planning Frameworks and Local Plans should have clear strategies for their delivery. **Neighbourhood Plans also have a role, as a localised and responsive part of the planning system, which can adjust at speed to changed circumstances. Such plans can also lead to greater engagement and support from local people in areas of major change.**

User: Just Space

Chapter 2: Spatial Development Patterns

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

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

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

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

In addition, and not included in this chapter, is the new suggestion in Policy H1 (B2a), for **“incremental intensification”** (4.2.5) which identifies “sites with existing or planned public transport access levels (PTALs) 3-6 or which are **located within 800m of a Tube station, rail station or town centre boundary**” … for optimizing housing delivery potential on such sites as small housing sites, brownfield sites, strategic industrial land, surplus public sector and utility sites, low density commercial and retail uses etc. Maps 4.2 and 4.3 therefore represent another spatial pattern of development which should be considered relevant to Chapter 2 and therefore the maps and discussion of them should be located in this chapter on Spatial Development Patterns; or integrated in the discussion of spatial development patterns. This is particularly important to ensure that different elements of spatial change in the city are consistent in terms of how their differential impacts on neighbourhoods, communities, and existing uses and assets are assessed and treated in policy and delivery.

Overlapping and contradicting spatial development policies

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

User: HTA Design LLP

The Spatial approach of the plan, with a strong and clear framework of strategic focus for regeneration is supported. In addition to the public transport led approach to strategic spatial planning, to genuinely give primacy and emphasis to the importance of active travel the spatial strategy outline in Chapter 2 should outline the planned routes for significant cycling infrastructure, as well as planned public transport infrastructure improvements or extensions. For example, the section could map out the recently announced six new segregated cycle routes planned (30.01.2018), as well as mapping out the boroughs identified later in the draft Plan to be the focus of improved cycling infrastructure and facilities, which will be brought forward through SPDs. In addition, we would suggest that the strategic green and blue corridors across the borough that encourage active travel between different parts of the city, could be highlighted within this chapter.

User: the Camden HS2 Association of Resident's Groups for Engagement (CHARGE)

The Euston Area Plan (EAP), produced by the GLA, working with TfL and Camden Council, was adopted in 2015. It is the plan for new homes, businesses, shops, community facilities, schools, new and improved public realm and open space.

The EAP recognises that to maximise the overall amount of new homes and jobs that can be delivered in a high-quality environment in the Plan area, there needs to be subsurface comprehensive station redevelopment, i.e. platforms and tracks from both HS2 and Network Rail stations need to be subsurface to allow for ground level development above the station.

The existing London Plan has an indicative employment capacity of 7,700 and supports a minimum 2,800 new homes.

The Euston Area Plan aims to deliver overall between 7,700 and 14,100 jobs and between 2,800 and approximately 3,800 additional homes. The draft London Plan aims to deliver 16,500 jobs and and 2,800–3,800 new homes.

Given that Network Rail has now ruled out subsurface platforms and tracks in any redeveloped station at Euston, and that residential developments and new public open space on deck above railway tracks is looking unlikely, we believe the figures for new jobs and new homes in the draft London Plan are unachievable if recommended building heights and commitments on replacement and new green and open spaces are to be respected.

If the number one objective of the EAP is to be achieved – to prioritise local people’s needs – and if our part of London is to be enhanced, we believe the draft London Plan should aim to deliver not more than 7,700–14,100 new jobs and 2,800–3,800 new homes in the Euston OA. Mention should be given that the upper figures are dependent on development and open space above the station and above the tracks. New homes should not be sacrificed to create new job space.

Euston communities are suffering the worst environmental impacts from HS2. It is essential that the Euston Opportunity Area delivers a balanced mix of new homes (including a minimum 50 per cent social homes), green and open spaces, schools, community facilities, shops and businesses and in a form that is not alien to the existing townscape.

Para 2.1.66 p. 53 Text on Euston Opportunity Area (no. 39) Draft text: ‘Scope exists to reconfigure Euston Square Gardens’. We propose that this text should be deleted, to ensure consistency with the Euston Area Plan (formally adopted) and to strengthen the need to have this protected London Square returned to full public use as a necessary green lung on the Euston Road.

User:	London Borough of Ealing

Finally, we note that references to the old London Sub-Regions have been deleted. Whilst there is perhaps little utility in their inclusion in a development plan we would point out that in West London we have a successful track record of working together across borough boundaries with a series of well- established practitioner, director-level and member- level networks under the West London Alliance. Spatial planning matters have been and continue to be important matters for discussion. Indeed, we have commissioned joint plans (e.g. waste) and several joint evidence base studies. This track record was also recognised by the MHLGC by their recent award of a substantial Planning Delivery Grant for existing and planned joint planning work. The WLA would therefore welcome continuing high level dialogue with the Mayor and GLA.

User:	Heart of London Business Alliance

We welcome the ambition of the draft London Plan and its emphasis on achieving the sustainable good growth our city needs. The strong environmental and transport policies of the plan will help to improve air quality in London. However, we have some concerns regarding the ability for the plan’s policies to be delivered, and the very significant funding gap identified for infrastructure is concerning.

User: Gidea Park and District Civic Society

We are concerned as to the sustainability of the obsession for growth and expansion within a relatively confined area even as large as London, it leads to ever more dense development and inevitable destruction of the very character you wish to retain.

Greater vision is required in addition to the obvious need to move some jobs away from London which will also ease housing demand. More people are to be crammed into high density developments causing overcrowding and social problems, will the actual designs match aspirations, past experience suggests otherwise ! The provision of infrastructure increasingly becomes proportionately more expensive.

The proposals to push more housing into the suburbs will totally undermine their character and is funding available for the necessary additional infrastructure ?

User:	My Fair London

The history of redevelopment and physical renewal in London is long and contested. Terms like ‘regeneration’ become loaded with meaning over time. Trust in public authorities has eroded as inequality has increased and as large parts of the population feel excluded by sight of the wealth they see around them but which is no part of their lives.

User:	Historic England

The scale of change proposed, particularly in the parts of London identified in this chapter, will call for highly effective management to deliver the aspirations in a sustainable way. The ‘step-change’ in delivery of growth requires a commensurate response, in policy and implementation, to conserving and enhancing London’s exceptional historic environment.

User:	Ministry of Housing, Communities & Local Government

Kingston Opportunity Area

The Mayor should ensure that where areas of new development are proposed, conservation and enhancement of the historic environment has been considered in line with national policy. Although this point applies generally, there is a particular concentration of historic environment features in and around Kingston.

User: Uttlesford District Council

Infrastructure

Figure 2.1 (The Key Diagram) of the draft London Plan identifies ‘Crossrail 2’, pointing to ‘Connections Stansted Airport’ as a growth corridor. This corridor ‘links beyond London’s boundaries into a ‘Strategic Infrastructure Priority’, identified on Figure 2.15 (Wider South East – 13 Strategic Infrastructure Priorities) and labelled as: West Coast Mainline, Crossrail; 2 North (London – Stansted – Cambridge – Peterborough) and M11.

User: Uttlesford District Council

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User: N\A

Chapter 2 Spatial Development Patterns

I am pleased to see the Opportunity Area approach for areas of London that will see significant development over the lifetime of the Plan.

In my Erith and Thamesmead constituency there are 2 Opportunity Areas – Thamesmead and Abbey Wood Opportunity Area and part of the Bexley Riverside Opportunity Area. These two OAs, very close to one another geographically, demonstrate so much about the potential development in south east London.

Taken together these two OAs have the potential to provide 14,000 new homes and 23,000 new jobs.

Absolutely crucial to the future of both of these areas is the provision of good transport infrastructure, particularly the Elizabeth Line and DLR extension crossing the river from Becton spur.

It is important to note that the real development action starts when new transport infrastructure is confirmed and realistically on its way.

It was only when it was known that “Crossrail” was definitely coming, and the timescale of its arrival, that developer interest sparked properly. The arrival of Peabody and its regeneration plans for Thamesmead and other developer interest in Abbey Wood would not have happened without certainty about supporting transport infrastructure. So the extension of the Elizabeth Line eastward has the potential to similarly stimulate required development in the Bexley Riverside Opportunity Area and in the corridor through towards Ebbsfleet.

The Mayor recognises the extension as a strategic infrastructure priority, and an important component in the matrix of London’s relationship with the wider South East. So I welcome the Mayor’s commitment to support Bexley and the adjoining Kent authorities in seeking a Government-led extension of the Elizabeth Line, but I worry this reliance on central government will put the project on the back burner, just when the Mayor is seeking to accelerate new house delivery by 2029.

Given the competing demands for Crossrail 2 and other infrastructure projects in the capital, I would welcome some serious consideration with partners as to whether there are other and possibly innovative ways finance could be raised for the project.

While I welcome that the Planning Framework should explore the level of growth that could be supported through significantly enhanced bus services and priority measures, it is journey times into London that will speak loudest to housing developers, and that is where the Elizabeth Line is key.

Within the Thamesmead and Abbey Wood Opportunity Area I agree the importance of revitalisation of Thamesmead and Abbey Wood centres, along with the focus on Plumstead High Street as part of development aspirations.

I welcome the recognition of the need to accommodate the expected growth by planning for and upgrading utility infrastructure – in particular water and electricity supply, broadband and a local heat network. These utilities have been a source of complaints by constituents since I was first elected in 2010.

The Plan also rightly recognises that, in view of the low-lying nature of parts of the area, particular attention should also be given to flood risk management. I have been concerned at the evidence of flooding – as yet not fully resolved – during the construction of the Elizabeth Line between the Plumstead tunnel portal and the new Abbey Wood station.

Within the Bexley Riverside OA my constituency covers Belvedere, and parts Of Erith. London Borough of Bexley now has a growth strategy in place, which has been drawn up with cross party agreement. I would hope that there can be a positive dialogue between the Mayor and Council to look at how the Mayor’s London Plan and the Council’s Growth Strategy might co-exist in the Borough’s and London’s interest.

I support the idea that industrial uses are retained and intensified, and form part of the mix in redevelopment proposals. After all, local jobs are vital and minimising the commuting journey is good for other components of the Plan.

User: Benhill Residents

This chapter fails to provide a strategic framework for development across London that might deliver sustainable communities and lifetime neighbourhoods.

Grass roots evidence suggests huge detriment in large scale development areas and at the edges of them, relating to rising housing costs and actual or potential displacement of local communities, shops and services that have sustained lower income communities in the past. There is evidence in the London Poverty Profile of movement of lower income households from inner to outer London. There is a question as to whether some changes in poverty indicators are as a result of displacement of lower income households from London.

Uncertainties relating to London's already dysfunctional housing market, the impact of Brexit, insufficient funding to support the development of housing that will meet the evidenced need of households with below median income levels as well as essential social infrastructure suggests that the plan is unsound.

Alternatives, such as the such as the Just Space's community plan, need to be properly considered.

There is a total lack of evidence / monitoring of Opportunity Areas to assess whether they are delivering the kinds of development required to meeting needs across income levels in London. This is the kind of evidence that is required to demonstrate that they do offer the best possibilities of delivering sustainable development that is - living within the planet’s environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using sound science responsibly.

We suggest that this chapter should instead focus on promoting lifetime neighbourhoods as a model for sustainable development across London. It should assert that all Londoners should have the opportunity to enjoy a good quality environment in an active and supportive local community. Ensuring this means planning for lifetime neighbourhoods in which communities are empowered and in which local shops, social and community facilities, streets, parks and open spaces, local services, decent home, jobs and public transport are affordable and accessible to everyone now and for future generations.

User: Elaine Chambers

CHAPTER 2 – SPATIAL DEVELOPMENT PATTERNS

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User: Earls Court Public Sector Tenants' Assoc

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User: Lands Improvement Holdings

MAJOR OUTER LONDON HOUSING OPPORTUNITY

Lands Improvement Holdings (LIH) specialise in the purchase, promotion and delivery of largescale development projects throughout the UK. Projects include the development of brownfield regeneration and sustainable greenfield sites. LIH's focus is on community led, sustainable development that delivers well-designed and well-connected communities that are pleasant and vibrant places to live and work and are valued by both new and existing residents.

LIH own a sustainable development opportunity site to the east of St Mary Cray in LB Bromley. The site adjoins the urban area and is near existing jobs, schools and shops. See **Appendix 1** for a Site Location Plan.

The site could deliver in the region of 1,000 – 1,200 family homes, including a significant proportion of affordable housing. The potential contribution of the site to meeting London's housing needs has not been considered as part of the draft London Plan.

The site is bound on three sides by existing development and no longer serves the purposes of Green Belt as set out in the NPPF. The eastern edge of the site could form a natural future boundary to the Green Belt with enhanced public access.

The site is of low environmental and agricultural value and is not being put to best use given the significant need for housing in London and the significant undersupply of housing sites.

As well as housing, the site has the potential to accommodate a new school / other community facilities and contribute towards transport improvements to public transport and local highways.

The site is in the Cray Valley Renewal Area and close to the Cray Business Corridor. Development on the site would support the growth and regeneration of these strategically important areas.

The site would be a catalyst for regeneration in St Mary Cray to improve local facilities, support create jobs and deliver much needed new family homes.

LIH also owns a number of sites in the wider South East and is separately submitting representations as part of a developer consortium on the implications of London’s unmet need on the wider South East region. This consortium is represented by Barton Willmore.

User:	London Travel Watch

London TravelWatch supports more intense development of those areas already well connected, such as transport hubs and town centres. The recognition that more convivial, healthy and accessible streets must accompany development is supported.

The opportunity areas (OA’s), where major development is directed are supported, but there should be more certainty about the timescales of supporting transport infrastructure. Where phasing of development is suggested, or interim public transport solutions promoted, there should be more detail. Bus services also need planning well ahead of implementation if they are to operate as efficiently as possible.

User:	Camden Town Conservation Area Advisory Committee

Major concern: we are very concerned that the definitions of areas for growth, both Opportunity Areas and Strategic Areas for Regeneration are not sufficiently precise. So Figure 2.1, read with Figure 2.3, and Figure 2.11 indicate, but do not define, Euston as well as King’s Cross as Opportunity Areas. The figures also show much of Camden, including comparatively prosperous areas, and areas of considerable local distinctiveness, as broad Strategic Areas for Regeneration. This is seen as threatening by local communities.

User: Queen Mary University of London

QMUL sits within the top 100 universities worldwide, and within the top 20 universities within the UK. The University was ranked 9th on the 2014 Research Excellence Framework and is one of the 24 leading UK universities represented by the Russell Group. QMUL is committed to strengthening and maintaining their global and UK position, and is committed to improving their facilities and campuses for current and future students.

The University is one of the UK's leading research focussed higher-education institutions with over 19,500 students in the UK being taught a range of subjects across humanities, social sciences, law, medicine, dentistry, science and engineering. Staff and student numbers have increased significantly in recent years and the University Estate has not fully kept pace with the quantum of growth, so there is a general need to expand the Estate to ensure students have an excellent university experience. The University has a strategic presence and is a major landowner in London, with campuses at; Mile End, Whitechapel, Charterhouse Square, and further accommodation at West Smithfield and Lincoln's Inn Fields.

Notwithstanding the requirement for growth of existing faculties, and student facilities on all sites, QMUL also have an aspiration for the development of a new Life Sciences Faculty and continue to promote their interests in land located to the south of Whitechapel Road at their Whitechapel campus. They are committed to a programme of widening participation in the research, treatment and improving circumstances and health outcomes for residents in East London, which will also have a direct benefit to London and the UK as a whole. The co-location of the University facilities and the Royal London Hospital provide the ideal strategic location for the development of a Life Sciences Faculty in Whitechapel. This vision has been supported by the MedCity vision which was first acknowledged in the Further Alterations to the London Plan (2015) and was detailed in the Mayor's 2020 Vision document. At a local level, it was included in the LB Tower Hamlets Whitechapel Vision Masterplan and has been realised in the draft allocation for Whitechapel South as part of the emerging Local Plan.

Engagement to Date

CBRE have previously submitted representations on behalf of QMUL in relation to emerging planning policies at both a Local and Regional Level, specifically in June 2016 as part of the early engagement on the emerging London Plan, CBRE on behalf of QMUL submitted representations to the GLA Call for Sites. This engagement with the Call for Sites process outlined the University's commitment to the development of MedCity and the Life Sciences Faculty at Whitechapel.

Following this, CBRE on behalf of QMUL submitted representations to the GLA 'A City for all Londoners Direction of Travel Document' in respect to QMUL's aspirations for their campuses across London, reiterating their commitment to the delivery of a Life Sciences Faculty ('MedCity') at Whitechapel.

At a local level, CBRE have also submitted representations on behalf of QMUL to the London Borough of Tower Hamlets Local Plan Regulation 19 Consultation further outlining their aspirations for Whitechapel and the growth of Life Sciences as well as the long-term aspirations for the Mile End Campus.

The engagement with LBTH has led to the allocation of the land known as 'Whitechapel South' for the purposes of employment-led development providing suitable units for the needs of life sciences, medical and research uses along with housing. QMUL have been long-term supporters of the allocation of the site for these purposes.

User: Vital OKR

para 2.0.6
London's Central Activities Zone (CAZ) and town centres are the primary locations for commercial and civic activity in the capital. These are complex parts of London, with a wide mix of uses and unique local character. The CAZ and the town centre network have a crucial role to play in supporting London's growth, and the London Plan sets out how this growth should be managed and planned for. Many town centres and the surrounding areas have potential to accommodate significant quantities of new housing, making the most of walking, cycling and public transport connectivity and complementing their commercial and civic role, while ensuring that diverse non?residential accommodation needs are met.

Our comments on para 2.0.6 relate to our comments about Policy GG5 regarding growing a good economy, and Policy SD6 regarding town centres, see later.

User: Natalya Palit

Chapter 2 – Spatial Development Patterns

For delivering growth within outer London boroughs consideration should be given to additional alternative options to simply focusing development in and around stations. For many people living in Outer London life does not necessarily revolve around commuting into central London. A larger proportion of families live within outer London, and for these households, day-to-day life can often revolve around children, and dropping them to nursery or school. Much of outer London traffic is generated from 'school runs'. Consideration could be given to encouraging higher density developments around schools as well as transport nodes and in town centres, not only to reduce house prices around schools, but also to recognise that for many Londoners, including working parents, and children schools can be the central focal point of their lives. This would help encourage sustainable travel patterns and reduce travel times between home and school and onward travel for parents who then go to work.

To genuinely give primacy and emphasis to the importance of active travel the spatial strategy outlined in Chapter 2 should also outline the planned routes for significant cycling infrastructure, alongside planned public transport infrastructure improvements or extensions. For example, it could map out the six new segregated cycle routes planned announced on 30.01.2018, as well as the boroughs referred to later in the draft Plan (Figure 10.2), which the Mayor suggests will be the focus of improved cycling infrastructure and facilities, to be brought forward through SPDs. In addition, the strategic green and blue corridors across the borough that encourage active travel between different parts of the city, should also be highlighted within this chapter.

The Mayor should give consideration to taking a more proactive approach to supporting local communities to engage in the plan-making framework from the early stages. For example, at the early stages of plan-making boroughs should be encouraged to ask local residents to put forward facilities and amenities in their area which they believe should be considered for designation as 'Assets of Community Value'. This will help to ensure that in regeneration areas particular spaces which are of intrinsic community value can be retained or re-provided in some form.

In relation to the intensification of town centre commercial space, whilst beyond the ability and remit of the draft plan, consideration should be given to the vast amounts of floorspace taken up by residential lettings agencies in central locations, and whilst from a design point of view they may offer ‘active frontages’ these types of spaces offer little real activity or value to the wider surrounding town centre areas they are located within. Whilst it is acknowledged that this may not necessarily be considered to be a strategic concern, consideration could be given to if and how less efficient uses of space such as these can be discouraged or encouraged to offer greater employment densities.

User:	Buckinghamshire District Councils & Bucks Thames Valley Local Enterprise Parthership

We welcome inclusion in the Plan of the 13 Strategic Infrastructure Priorities endorsed by the wider South East partners for initial delivery. (Figure 2.15)

User:	Buckinghamshire District Councils & Bucks Thames Valley Local Enterprise Parthership

14. The inclusion of the 13 Initial Strategic Infrastructure Priorities endorsed by the grouping of wider South East partners is welcome. The text accompanying Figure 2.15 should clarify that the list of 13 priorities may evolve over the life-time of the Plan as existing schemes such as the Cambridge – Milton Keynes – Oxford corridor progress and/or new priorities emerge, including connectivity to London, Heathrow and Old Oak Common. We welcome the recognition that any additional growth opportunities unlocked by the infrastructure investment may be required to meet South East demands, rather than those from London. Capacity and the scope for additional development vary locally within the South East and it is rightly a matter for local leadership to determine how to meet needs in a sustainable manner.

User:	Chartered Institute of Logistics & Transport

CILT notes the relationships between the Opportunity Areas and transport schemes identified in this chapter and in general terms supports the principle of growth related to transport improvements

User: Central Bedfordshire

Green Belt

Paragraph 2.3.1 states that that Plan “aims to accommodate all of London’s growth within its boundaries without intruding on its Green Belt”. Whilst the Central Bedfordshire Council support the protection of the London Green Belt where appropriate, given that there is an identified unmet need of 1,000 homes a year throughout the Plan period, a review should be undertaken to identify whether there is any potential to release and London Green Belt before potentially seeking assistance from peripheral authorities to help meet that unmet need. This is particularly important given that many of those authorities may also have Green Belt, and may already be seeking to release Green Belt land to accommodate their own growth requirements. We believe that the Mayor should do more to ensure that all development options are considered to meet London’s own needs within its boundaries, including a review of its Green Belt, and encouraging reuse of commercial land where appropriate.

User:	Landscape Institute London

LI London is cautiously in agreement with the principle of densification, but are concerned that it will be extremely difficult to achieve without the loss of open and green space. The use of traditional mid-rise street patterns will be more appropriate to the context of many parts of London as a way to achieve high density.

User: Culverley Green Residents' Association

Bakerloo Line Extension Opportunity Area

We have noted the proposal, not yet costed,designed or funded to extend the Bakerloo Line to New Cross , then Lewisham and then possibly to Catford and Bromley. This appears to have given rise to the proposed above Opportunity Area. We have also noted that Lewisham Council is expected to produce a Framework Plan, working with local communities. We are not aware of any work being done on such a plan although there is some work, being led by transport, being done on Catford Town Centre we believe. It does not involve the Planning department and they have not been able to brief local groups as to content.

As LBL is strapped for resources we are not sure how such a plan is to be produced. However we are most concerned to note that the draft London Plan actually gives targets for this Opportunity area, in advance of a framework Plan being produced of some 13,500 residential units and 4000 jobs. The Plan then goes on to list potential development sites in Catford and indicating a capacity of some 2700 residential units in these Town Centre sites. Unfortunately the Plan seems to suggest that this number of units can be accommodated without any improvements to public transport. Both Catford and Catford Bridge stations are seriously overcrowded at peak times and Catford station has a very poor level of service, half hourly trains after 9.15 with trains regularly late or cancelled. Catford bridge station has a slightly better level of service but I believe extra train paths are constrained by the junctions near Lewisham station which are at capacity.

I am aware that Bexley could accommodate a significant number of new dwellings but that these are hampered by the poor level of train service which can not be improved because of the problems of these same junctions. Infrastructure improvements need to happen first. We have noted the recent reports in the press about people getting off buses and trains and back into their cars which is exacerbating the slowness of buses and making air quality worse. Catford also suffers from frequent traffic jams on the South Circular caused by the constraints of the railway bridges. Adding more residential units in the area , many of them on sites which have their access right next to the railway bridges will not help this situation. It is impossible to stop people having cars and driving them. As a residents association we suffer in our area from parking by commuters and council employees. Many of us end up with our cars blocked in our drives by people parking inconsiderately. One day it was a council traffic engineer. The council refuses to install a CPZ. Further development in Catford without controls or without significant improvements to trains and buses will only make the situation even worse both for existing residents and businesses who battle with the pollution and the congestion every day.

We were even more concerned to note that the Plan suggests that even these proposed high numbers for Catford could be increased if the Bakerloo line extension is proposed to come as far as Catford. We do not see that Catford should become a City of Towers, that is not it’s character and nor is it desirable to cram every site with towers of tiny flats for single people or worse with overcrowded families as they have no choice.

User:	Lidl UK GmbH

Lidl is generally supportive of the draft Plan’s approach to retail land uses and the focus upon town centres across London.

User: Northwoods Voice Limited

Chapter 2. Spatial Development Patterns

The building growth in the Town has appeared in recent times to have been largely opportunistic and has resulted in a crowded Town where traffic growth has become, NVL believes, a major issue for residents. This naturally also gives rise to parking issues and pollution issues. The Draft London Plan and its opportunistic higher-density policies seeks to make this worse, not better, by suggesting tall buildings, smaller living units, small extensions or unit developments in gardens. The extended denial of adequate parking arrangements is not an acceptable way, in our opinion, to encourage good growth in our suburban environment.

User: Chairs of Camden's Conservation Area Advisory Committees

Chapter 2 Spatial Development / opportunity areas

Major concern: we are very concerned that the definitions of areas for growth, both Opportunity Areas and Strategic Areas for Regeneration are not sufficiently precise. So Figure 2.1, read with Figure 2.3, and Figure 2.11 indicate, but do not define, Euston as well as King’s Cross as Opportunity Areas. The figures also show much of Camden, including comparatively prosperous areas, and areas of considerable local distinctiveness, as broad Strategic Areas for Regeneration. This is seen as threatening by local communities.

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User:	Design Council

This chapter responds strongly to the strategic purpose of the London Plan requiring the London boroughs to plan positively for growth in their areas. In general, we support the spatial development patterns set out in Chapter 2 of the Draft New London Plan. The focus on the role of Opportunity Areas and Growth corridors provide a strong basis on which to plan for new housing and commercial development and respond to investment in transport and other infrastructure (e.g. utilities, communications, green space and social infrastructure).

User: Sustrans

Chapter 2: Spatial Development Patterns
Chapter Overview comments
Guided by Greater London Authority planners, Opportunity Areas should be exemplary for the Healthy Streets they deliver. Through the framework development process, Healthy Streets Strategies should be developed that plan the walking and cycling networks for the area. The Battersea Nine Elms Cycling Strategy has led to the proposals for dramatically enhanced streets on that site, funded through local planning obligations.
There is a pressing need for local transport improvements across London to unlock suppressed walking and cycling potential. Less than one percent of London's road network features cycling infrastructure of sufficient quality and it is our view that opportunities to improve local streets, public space and supporting transport infrastructure must be maximised through the Opportunity Area process. We feel that there is a gap between strategic targets (SD1 A 8 and B 7) and specific local projects identified in the supporting text (for example, 2.1.16 and 2.1.45). **The chapter should include a policy statement indicating that all streets and public spaces within the scope of Opportunity Areas should be assessed for cycling and walking improvements**, following best-practice guidance contained within the London Cycle Design Standards and Healthy Streets Check.

User: Hornsey & Wood Green Labour Party

Notes on Chapter 2

We welcome the emphasis in this chapter on the provision of more housing and more jobs to meet the needs of London's expanding population but are concerned about the impact of this enormous amount of development on the capital's green and open spaces, on its vibrant cultural life, its transport links and on the overall quality of life.

Introduction

Para 2.02 We agree with the statement in that London's green and open spaces and its parks and rivers are a vital part of the capital. It is very important that the Green Belt and Metropolitan Open Land designations are reinforced and protected.

2.07 We welcome the emphasis on sustainable and inclusive regeneration which benefits local communities and where new employment and genuinely affordable housing are properly integrated into development.

User: Mr Gary Hayes

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User: Landsec

Chapter 2: Spatial Development Patterns

We support the general principles and approach of Policies SD1 – SD10. The majority of our London investment is in the CAZ. Our recent development activity there has delivered over 3.5m million sq ft of new commercial floorspace and the business rates from our customers contributes £89m. We would therefore like to highlight and strongly endorse the representations of the Alliance in respect of SD4 (The Central Activities Zone) and SD5 (Offices, other strategic functions and residential developments in the CAZ).

User: Andrea Carey Fuller

This chapter fails to provide a strategic framework for development across London that might deliver sustainable communities and lifetime neighbourhoods.

Grass roots evidence suggests huge detriment in large scale development areas and at the edges of them, relating to rising housing costs and actual or potential displacement of local communities, shops and services that have sustained lower income communities in the past. There is evidence in the London Poverty Profile of movement of lower income households from inner to outer London. There is a question as to whether some changes in poverty indicators are as a result of displacement of lower income households from London.

Uncertainties relating to London's already dysfunctional housing market, the impact of Brexit, insufficient funding to support the development of housing that will meet the evidenced need of households with below median income levels as well as essential social infrastructure suggests that the plan is unsound.

Alternatives, such as the such as the Just Space's community plan, need to be properly considered.

There is a total lack of evidence / monitoring of Opportunity Areas to assess whether they are delivering the kinds of development required to meeting needs across income levels in London. This is the kind of evidence that is required to demonstrate that they do offer the best possibilities of delivering sustainable development that is - living within the planet's environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using sound science responsibly.

We suggest that this chapter should instead focus on promoting lifetime neighbourhoods as a model for sustainable development across London. It should assert that all Londoners should have the opportunity to enjoy a good quality environment in an active and supportive local community. Ensuring this means planning for lifetime neighbourhoods in which communities are empowered and in which local shops, social and community facilities, streets, parks and open spaces, local services, decent home, jobs and public transport are affordable and accessible to everyone now and for future generations.

User: Surrey Planning Officers' Association

Accommodating housing needs and collaboration with the Wider South East
The Draft Plan recognises that the delivery of housing will be challenging and relies on significant development occurring in the identified Opportunity Areas (OAs) and substantially increasing the output from small housing developments. The delivery of many of the OAs is, in turn, dependent on the timely delivery of key strategic transport infrastructure along identified growth corridors within London. The Plan's focus on intensification will require investment in new and improved transport and enabling infrastructure more generally. Accordingly, the Plan needs to be clear about the mechanisms for ensuring that such infrastructure is secured in practice.

In addition, we are concerned that the Plan only makes provision for the delivery of around 65,000 additional homes a year against an assessed housing need of about 66,000 homes a year with no demonstrable strategy to meet the shortfall. The emphasis on higher density development and smaller units could have implications for Surrey since previous under-delivery in London and lack of affordable family units has added to housing pressures in Surrey districts and boroughs with associated implications for infrastructure in our areas.

User:	London Borough of Camden

The contribution of Crossrail and Crossrail 2 to housing and economic growth in London is recognised but the funding mechanisms for these projects should be designed so that they do not draw funds away from other necessary infrastructure at the local level.

User: Highams Park Planning Group

POTENTIAL SITES FOR DEVELOPMENT (PSD)

Development & redevelopment of sites shall be consistent with Objectives 1-7 of this plan and in general compliance with the policies contained herein.

Given its proximity to London, the Highams Park Area has been gradually developed over the past 140 years and there is no available greenspace for development. In the WFCS 21 Highams Park is designated as part of the Chingford core area and, as such, is designated as a predominantly suburban area that contains large pockets of forest and green belt land. In view of the foregoing and the desire of local residents to maintain the character and “greenness” of the Area, this Plan requires that development be through redevelopment of sites that have already been developed as detailed in this Section 4.8.

For the avoidance of doubt inclusion of sites in Table 1 below does not mean that they are going to be developed or that we are recommending these sites for development. The purpose of this list is to acknowledge that there is a possibility that these sites could be developed by the existing (or future) owners at some point and to set parameters to ensure that any development that takes place is the most beneficial for the Area and in accordance with the expectations of local residents.

POLICY PSD1: Guidance for Specific Development Sites:

Should development of the sites listed below take place development shall be guided by the principles shown in Table 1 of this policy

1. 190-196 Larkshall Road (by the underpass at Chingford Hatch)
2. Naseberry Court and Greenthorne Centre, Merriam Close
3. Aldriche Way Estate
4. 470 – 490 Larkshall Road
5. 2 Winchester Road / 3 Selwyn Avenue
6. The Regal Cinema and adjoining site at 491-493 , Hale End Road
7. 275 Hale End Road (former care home - top of Malvern Avenue)
8. Arches under Wadham Road Bridge, Wadham Road
9. Best Western Plus Epping Forest Hotel, 30 Oak Hill
10. Beechwood Drive Estate, Beechwood Drive
11. St Patrick's Court, Bridle Path , Woodford Green

Site	Existing Use	Possible Future Use	Contraints	Guiding Principles
Site 1: 190-196 Larkshall Road	A vehicle repair garage and a car wash.	Residential	? Railway line adjacent ? Height of adjacent residential property ? Reservation for potential "Hatch Lane halt" on rail line	? Design to respect the style and materials of the neighbouring residential property ? Not to exceed two stories plus pitched roof adjacent to neighbouring residential property ? Rear building line not to extend behind the rear building line of neighbouring residential property
Site 2: Naseberry Court and Greenthorne Centre	Health and social care	Expanded and enhanced health and social care. Discussions with the local mental health Trust indicate that the redevelopment of these premises could provide an enlarged and enhanced facility for local NHS patients. Consideration should be given to relocating all services currently at the former Chingford Hospital site to this location to provide "single site" options for patients with better access to public transport and parking. Should residential use be proposed,	? Access from Larkshall Road ? Height of buildings to respect neighbouring residential property to the	? The site lies between existing three storey residential property (Rolls Court) and the Highams Park business park (BEZ). To the west lies the Rolls Sports Centre. ? Consideration must be given to maintaining adequate daylight for the sports facilities at the Rolls Sports centre. ? Adequate parking for staff and patients should be provided on site to avoid increased parking pressure on surrounding residential roads. ? Should residential use be proposed, adequate parking to be

Chapter 3 Design

User: Mr Colin Bannon

Overall it would be good to include some photographs of good examples and case studies throughout the design section. There is reference to other policy documents and guidance but there is also opportunity to add more in some sections. For example,

3.1.5 Design out crime – useful to reference: interactive.securedbydesign.com

3.2.2 reference GLA's Character & Context SPD

3.2.8 For DAS - D1 and D2?

3.31 Should sexual orientation also be included? Tying up with the LGBT+ venue charter, rainbow flags, etc.

3.3.4 Entrances need to be carefully considered in terms of their context so for example if a building is on a corner of a residential street and a commercial street, then the main resi entrance should be on the resi street, etc.

Policy D4

A – Could different typologies of flats be considered too – single aspect, duplex, etc. And also different typologies of building – mansion block, villas, townhouses, etc. All of which can occupy flatted developments but give a more interesting streetscape. This would also align with the Mayor's "A City for Londoners" – where "developments do not need to be tall". Developments need to create visual vitality on the street and in doing so improve place making.

D 9 – private space – minimum standards 5m2. Can we caveat that LA may have their own standards which may be greater than this.

F – could reference be made to some documentation on how to avoid overheating, etc? Could the type of balcony be discussed for example, a recessed balcony or winter garden next to busy roads and higher levels, projected balconies at lower levels in courtyards, semi recessed in south facing aspects to offer some shelter and a possible combination of 2 or all three to offer variety to the façade of the building.

3.4.12 Equipment on top of buildings should be hidden from view. PV panels are only suitable at the top of a building where they are not overlooked by resi developments. Green roofs are more suitable on flat roof sections of a development which are overlooked by residences.

3.5.4 Does this cover the instance where a building will require 2 lifts for wheelchair access if these units are on the upper floors? Situations sometimes arise that disabled units will be placed on the ground floor to avoid this requirement, but these GF units are often more suitable for family housing which overlook play areas in shared spaces for example.

3.6.6 It would be good to reference some good guidance material on how to create successful masterplans.

Policy D7 and associated sections

It would be worth mentioning something about the design of shopfronts and how they interact with the public realm. How retail units can help activate space and contribute to place making – ref some good guidance and case studies.

3.7.1 Shared space is worth mentioning as there are lots of areas of London which have conflicts between pedestrians and vehicles, such as loading bays and refuse vehicles sharing public realm and sometimes private space. Loading and refuse vehicle collection should ideally be kept to the periphery of sites to encourage the maximum amount of quality public realm for people to enjoy.

3.7.9 In regards to maintenance, the use of robust materials such as granite in areas which have high or heavy vehicular use. Also soft landscaping should be dependent as little as possible, on manually watering. Therefore water retention systems should be included in schemes, from irrigation systems in public realm planters to water butts for recycled rainwater in private developments.

Policy D8

C 3)a) Worth mentioning tests - Lawsons criteria with graphical reps for wind comfort, as well as daylight and sunlight graphical reps in public realm areas and shared spaces within developments. These should be provided at the earliest opportunity in the pre-app process as the design of the building can determine how it affects public realm and private amenity. It is harder to make significant changes to the building down the line if there are problems with daylight/ sunlight/ wind in these areas. The view should be how do we maximise sunlight and daylight into these areas and minimise the negative aspects such as wind from the very start.

3.8.4 Worth mentioning architectural treatments that can be used on the top of a building to help “finish” it, give it a more recessive quality and in doing so reduce the bulk and mass.

3.8.7 Also important to know what a tall building will look like at night. Lighting design can provide an important feature in a neighbourhood. It can also look utilitarian and therefore be a detriment to the neighbourhood.

User: Shared Assets

We support London Food Links response:
This chapter includes some good policies on minimum internal and external space standards, and temporary use of development sites, but we would like to see the inclusion of:

- a recognition within design of the **importance of communal gardening** and food growing, due to the role these play in ensuring that active healthy lifestyles and community-building activities are made easier and more accessible
- **designing space with flexible use that can be easily adapted to growing food**, so avoiding the retro-fitting of housing developments, once demand is established for food growing amenities.

We strongly support the inclusion into policy of access to free drinking water, recognising its' environmental and health benefits.

Overall it appears that the role of food growing in terms of the health benefits, wider social and environmental benefits is not fully appreciated or integrated into the draft New London Plan despite the strong evidence on this topic and the Mayor of London's commitment to a refreshed London Food Board and London Food Strategy.

User: Ms barbara weiss

1. D1 A (7) ....that are appropriately sized to reflect population densities. New developments must not be allowed if there are not sufficient or adequately sized open green areas in the immediate vicinity.
2. D1A (11) **The form and layout of a place must be based on the understanding of the heritage of the area, including its historic grain and archaeological interest**
3. D1 B (1) building and spaces that are of a scale, **HEIGHT**, appearance....and **CONSERVES EXISTING HISTORIC ENVIRONMENT**
4. D1B (2) use of attractive, robust, **DURABLE** materials, which weather and mature well and are appropriate for the character of the locality.
5. 3.1.2 **To deliver a public realm that is high quality, and appropriate to the character of a particular area, more generous floor-to-ceiling heights at ground floor level must be encouraged if to be found in neighbouring typologies.**
6. 3.1.4 Green open spaces must be provided that are adequate and appropriate to the density of local population. Conversely, the size and density of all new developments must be determined following careful consideration of the overall provision of a local green areas.
7. D2 A ...which strengthens what is valued in a place, **AND WHAT INSTEAD COULD UNDERMINE IT OR HARM ITS CHARACTER**
8. D2 A 1a) **LOCAL CHARACTER**
9. D2 A 3 **PREVAILING MATERIALS AND QUALITY OF PUBLIC REALM**
10. D2 A 7 a) and heritage assets....**VIEWS**
11. D2 B appropriate and **SYMPATHETIC TO CONTEXT**
12. D2 C **THE USE OF 3D MODELS SHOULD BE A COMPULSORY TOOL FOR ALL PLANNING APPLICATIONS RELATING TO TALL BUILDINGS, AS WELL AS TO BUILDINGS TALLER THAN THEIR IMMEDIATE NEIGHBOURS, TO ALLOW FOR A FULL EVALUATION OF IMPACT AT CLOSE QUARTERS, AS WELL AS FROM A DISTANCE.**
13. D2 D **PRESCRIPTIVE DESIGN CODES** should be devised and agreed, in order to ensure that materials appropriate to context are used and detailing is generally of high standard
14. D2 F All London Boroughs must have access to highly qualified and experienced **Design Review Panels,** whose opinion will be sought and taken into account as part of the planning process for all medium to large developments. Large developments and any above 30 m should be made to submit their design developments to several design reviews at specific agreed stages during the course of the various design stages.
15. D2 H Planning permission should never be granted on an outline basis only.
16. 3.2.1 TOO FREQUENT USE OF EXPRESSION " efficient use of land". Replace with "**a*ppropriate* use of land**"

17. 3.2.7 All Boroughs must engage with professional Design Review Panels. It is not acceptable that some Boroughs do not have this level of design scrutiny available (Westminster?). Decisions must be monitored.

TALL BUILDINGS

1. D8 Tall Buildings - Opening paragraph: It is totally **ridiculous** that tall buildings should be justified for their 'supporting legibility across the city to enable people to navigate to key destinations' : in the generation of Google maps, Waze, Tom-tom s etc. this is a completely pathetic excuse for what amounts to self-serving developer and Borough greed and financial gain, at the expense of London as a whole. The consequences of allowing inferior, badly designed towers to be built are now available to be seen by all. **We need to stop the trend. Tall Buildings should be the exception, not the rule.**
2. It is furhtermore now well-known that tall buildings can only be 'sustainably developed' at vast expense to the developer, who must be prepared to pay for very expensive and high quality materials and systems - this rarely/never happens in the UK, particularly not in residential towers built to sell. The majority of tall buildings are built cheaply and badly, and will become, in the long term, the slums of the future. The planning system needs to wake up to the fact that the Boroughs will be left with a large number of obsolete eyesores that will be in need of huge sums of money to be upgraded and repaired. This is the reality. Our top sustainability academics are warning us of the un-sustainable nature of Tall buildings, the extra energy that they require to be run, the embodied carbon that they require to be built. The Mayor must introduce a far higher sustainability bar when scrutinising planning applications for this type of building, with the results being openly discussed by specialists prior to planning consent being awarded to the developer.
3. Tall Buildings must be of the **HIGHEST design quality (**omit 'required' design quality) "a**nd make a positive contribution to the skyline, townscape and scale shaping the character of the area. Developers must assume the burden of proof in demonstrating how their proposal will make a positive impact and add value to existing communities and to the city as a whole"**
4. D8 A What parameters are going to be used, and by whom, to define what a Tall Building is in each Borough? This should not be left to the Boroughs themselves - as they are very much interested parties, as they stand to benefit from building tall.
5. D8B should be modified to read: " Boroughs should identify on maps in their Local Plans all appropriate heights for new buildings, and specifically identify locations where Tall Buildings might be appropriate, sensitive or inappropriate, taking into account: ....Decisions about local heights should be open to consultation by a) local residents, who must have a say in how their neighbourhoods are transformed and b) statutory consultees such as Historic England , Royal Parks etc, as tall buildings affect the wider city and not just local areas

6. D8B 2) Developers must prove that they have tried to deliver different configurations of buildings before resorting seeking consent for a Tall Building, and should qualify that Londoners will be substantially benefitting from the houses being built Regeneration and homes can be delivered in many different ways. It must also be stated what type of housing is being proposed, and for what type of end user. London should not be trashed purely for the benefit of investors.
7. D8B 3) Public transport provision must be examined carefully by specialists if population numbers are being greatly increased in a specific area - the influx of many more passengers often results in the local system becoming for everyone.
8. D8 C 1 a) including **the impact of the building on the local community and on the character of the area**
9. The impact must be particularly assessed from conservation areas, parks and all sorts of precious locations around London, to avoid 'bombing' of treasured views by incongruous out-of-scale buildings, as has been happening across the city (eg Walkie Talkie vs Tower Bridge, or St George's Tower vs Pimlico streets). Views from windows above street level must also be protected. Conservation officers are becoming much stricter about what is acceptable to be seen on roofs etc from upper level windows - this should be extended to views of Tall Buildings.
10. D8 C b) "aid legibility": pathetic and ridiculous, as above
11. D8 C c) agree materials should be of exemplary standard - but London is morphing into a glass and steel 'generic' city; masonry/solid towers contribute a greater feeling of permanence within London's historic environment. We need guidelines on desirable materials and codes on recommended longevity. At the moment towers are now built to last much longer than lower buildings and they will be very difficult to demolish and rebuild.
12. D8 C d) Any Tall Buildings that are judged to cause any level of Harm **should be refused planning consent.** There is no justification at all for allowing this typology to continue to undermine London's character and its historic assets. Tall Buildings should **'positively contribute', or not at all.**
13. D8 C e) **Tall buildings should not be allowed within the settings of World Heritage Sites, as they inevitably undermine the settings and their views.**
14. D8 C f) The River Thames has already become a canyon and is becoming worse day by day, as we can now see the consequences of the disastrous planning decisions taken in past years. No new towers should be allowed along the River or within a good margin of it. As suggested by Graham Morrison:

The Mayor and the London Plan need to first appropriately reflect the significance of the River Thames to London's enduring character and attraction. The importance of the central section of the river cannot be overstated. It is one of the most significant spaces in one of the most important cities in the world. There is a need to define the significance of the River Thames and to develop policies which are appropriate to its management.Secondly, a statutory custodian of this stretch of the River Thames must be agreed. This custodian should be an independent body that can act as a statutory consultee on all planning applications close to the Thames. This custodian would test applications against a set of principles which, might include "the closer to the river, the more one has to contribute to it". Establishing a statutory custodian could be achieved in one of two ways:1. Protecting the central section as a listed structure - Technically it would be possible to list this section of the river. Much of the river bank is man-made and therefore listable as a built structure. This approach would give Historic England the role of statutory custodian.2. Establishing a new independent organisation, separate to Glad, TfL and the Port of London Authority, with the statutory powers to manage change along the riverside. Its remit would include coordinating the views of all the political authorities, conserving the river's history and ensuring that new development understood, addressed and reinforced the character of the river rather than simply exploiting it. Such an authority would fill a yawning gap in the armory of London's conservation.

15. D8 C 2 d) it must be demonstrated that the area local to a new Tall Building has adequate infrastructure to accommodate a substantial increase in local population: public green spaces, schools, surgeries, transport etc.

16. D8 C 3 a) it is well known that Tall Buildings do affect wind, daylight, sunlight etc. Planning applications must be scrutinised very carefully and the bar must be placed very high in order to ensure that the local environment is not affected, and that neighbours are not made to suffer due to the new construction, as has been happening all too frequently in recent years. **Compulsory guidelines on minimum distances between Tall Buildings and their neighbours should be introduced.**

17. D8 D Tall Buildings should be assessed for their impact on surrounding and long distance impact both individually and as part of any cluster they might belong to. Boroughs must ensure that these checks include any other towers that are known to be in the planning pipeline.

18. 3.8.1 Disagree on need for Tall Buildings to help navigating...Agree need for 'exemplary architectural quality', but this needs to be agreed by Design Review Panels and general public. At the moment these very important decisions are often taken in an un-democratic fashion local people and statutory consultees having almost no powers to veto.

19. 3.8.3 It must become compulsory to use 3D model, for developers, Boroughs, GLA, statutory consultees etc. This technology is now widely available and reasonably priced. The cost should fall on the developer.

20. 3.8.6 Great care is needed to minimise the impact of a Tall Building at Ground Level. Too often one is faced with loading bays or other unacceptable street level elevations. NY-style plinths are a useful architectural device to bring towers down to street level in a considered manner.

User: London Legacy Development Corporation

Design

LLDC supports the emphasis placed on securing good design, and the use of mechanisms such as design Codes and review panels. We have a skilled in-house design and planning team, who would be happy to share learning or provide case studies on their approach to ensuring high quality design and placemaking on major schemes. More generally, given the resource constraints encountered by many LPAs some additional guidance outlining how this should be applied in practice would be helpful.

User: The Access Association

Whilst we are supportive of the Policy D3, we are concerned that previous versions of this Policy (7.2 of the current plan and 4B.5 of the 2004 Plan) have not been delivered in a consistent manner across the boroughs. Further less and less boroughs have access advisors / experts within their planning teams and as such LPA are not able to enforce in an appropriate way. The current SPG serves as a clear guide on the process of delivering an inclusive environment as well as the need to engage access experts where appropriate and consult with local accessibility groups. Under the new Policy D11 Fire Safety we note that the Policy requires an Independent Fire Statement produced by a third party suitably qualified assessor as a reflection of the complexity of the matter, Policy D11 is similar to D3 in that it expects the highest standards of fire safety where D3 expects the highest standards of inclusive design. D3 also requires an Inclusive Design Statement. For consistency we recommend that D3 also requires the Inclusive Design Statement to be produced by a suitably qualified assessor.

User: London Food LInk /Sustain

This chapter includes some good policies on minimum internal and external space standards, and temporary use of development sites, but we would like to see the inclusion of:

- a recognition within design of the **importance of communal gardening** and food growing, due to the role these play in ensuring that active healthy lifestyles and community-building activities are made easier and more accessible
- **Designing space with flexible use that can be easily adapted to growing food**, so avoiding the retro-fitting of housing developments, once demand is established for food growing amenities.

We strongly support the inclusion into policy of access to free drinking water, recognising its' environmental and health benefits.

Overall it appears that the role of food growing in terms of the health benefits, wider social and environmental benefits is not fully integrated into the draft New London Plan despite the strong evidence on this topic.

User: London Assembly Green Party Group

I support the overall approach of increasing density in areas with good transport connectivity, but planning for increased density must be done very carefully to avoid unintended consequences and to make sure associated services and infrastructure are also provided at the right pace.

I have big concerns about the primacy of density in D6, including the way the detailed implementation of this is left up to borough. In the ‘design led’ approach in D2 it is also hard to see how the boroughs can easily do this in time and in enough detail to prevent excessive density on sites coming forward early in the plan.

The removal of the density matrix even as an overall guide or benchmark (we are skeptical of PTALs being used in such a prescriptive way) is probably a mistake and many people are saying this, including the response to the draft London Plan from the London Assembly as a whole, via the Planning Committee.

Overall this chapter is too technocratic and doesn’t pay enough heed to the views and expertise of local communities. This is important to correct if new developments are to maintain a sense of place, and aren’t going to be contentious and beset with delays, particularly on small sites.

MISSING DESIGN POLICIES

Back garden protection

I am concerned at the removal of the current London Plan policy 3.5A, which says: “boroughs may in their LDFs introduce a presumption against development on back gardens or other residential gardens where this can be locally justified.”

Combined with the new presumption in favour of development on small sites, which covers a range of infill and extension developments that could encroach on back gardens (policy H2) I believe we risk losing a lot of quality green space and their flood alleviation, biodiversity, carbon sequestration and air pollution benefits, without appropriate safeguards being in place.

See also my comments and amendments on this issue proposed for policies H2 and G4.

Retrofitting homes and buildings

The Mayor’s draft Environment Strategy says that 100,000 homes will need to be retrofitted with energy efficiency technologies each year to meet the target of zero emissions by 2050. However, there is no policy or reference to retrofitting in this section of the plan. This serious omission needs to be rectified with the restoration of policies from the current London Plan (Policy 5.4 retrofitting).

The Mayor’s commitment to tackling the effects of climate change through new development and his support for retrofitting the substantial stock of existing buildings mean that London is well positioned to boost the ‘green’ business sector, with opportunities in renewable energy, low carbon technology, waste reduction and recycling.

Response to Mayor’s draft Environment Strategy. Caroline Russell AM, Nov 2017
https://www.london.gov.uk/sites/default/files/2017_11_17_caroline_russell_env_strategy_response_final.pdf

London Plan 2016 https://www.london.gov.uk/sites/default/files/the_london_plan_2016_jan_2017_fix.pdf

User: London Ambulance Service

We recognise the importance of growth for London and the development of town centres. In assessing the potential for intensification in town centres, access for emergency services should be a key consideration. As town centres become increasingly congested and road layouts change to accommodate new developments this impacts on us, both in the short-term, while works are carried out and longer-term in changing access routes and increasing and changing the demographics of an area. The rate and scale of construction in London can create challenges for us, particularly where there is a significant impact on surrounding roads. We have adapted how we operate to take account of growth in London and some of the challenges in accessing certain parts of London by vehicle. In highly congested areas we operate cycle response teams and motorcycle response teams who treat patients and can either discharge them at scene or provide life-saving treatment whilst an ambulance is on its way. They carry the same equipment as ambulances and are an essential resource in London, however they cannot transport patients, so there is always a need for planning to take account of emergency service access – this needs to consider both vehicle access but also the ability to gain access quickly in order to not delay patient care. There is also a need for us to be able to park safely whilst we treat patients. Engagement should be early so that we can engage in any consultations as fully as possible.

We have been engaged in the consultation on the pedestrianisation of Oxford Street and have raised concerns about access to the entire length of Oxford Street. Whilst we have motorbikes and cycle responders, their availability is limited and they operate across several areas in London, not just Oxford Street. We would therefore require access for full size ambulances at all times. We have made several suggestions to Transport for London and the project planners about possible options that would support our requirements and provided them with vehicle dimensions. We would not expect any changes to Oxford Circus to lead to undue delays for our vehicles, as this could delay an emergency response and could result in complications for the casualty/casualties.

Planning also needs to strike a balance in improving health outcomes for Londoners and our ability to reach patients quickly. Whilst we support the desire to improve travel in the capital we always support direct, unhindered access to all of London’s roads to ensure we can provide the best possible care to patients. Furthermore, whilst we are in principle in favour of schemes that reduce the potential for accidents and the severity of injuries we are a fully mobile organisation. Travelling at reduced speeds across significant areas is likely to increase travel times, which can reduce the availability of our crews and increase travel times to hospital or patients, subsequently having a negative effect on patient outcomes.

Planning changes also impact on us as they have the potential to rapidly increase the number of people living within a small area. Large population increases through the development of flats can create additional demand on the service and we would need to manage our resources to ensure we can meet these needs, particularly where they focus on specific demographics, such as the creation of retirement homes. New developments also need to take account of access requirements, both in reaching patients in their homes and extricating them, as well as ease of access to the property. This is particularly important when accessing high rise buildings, where the time taken to reach patients in upper floors can increase response times. We would welcome conversations about how planning can mitigate the risks, such as the introduction of public access defibrillators in tall buildings or areas where emergency service access is restricted. We work with groups and businesses across London to encourage them to install defibrillators, particularly in areas where we know access is challenging; however this is not a requirement and as a result is not adopted by all buildings. We know that having access to a defibrillator saves lives, where a public access defibrillator is used a cardiac patient is five times more likely to survive.

User:	Mrs Seonaid Royall
Communal open space: In major development residents should have access to communal gardens where it will be possible to experience the seasons, enjoy plants and have the opportunity to engage in food growing themselves.	

User: Mrs Belinda Taylor

Policy D4

Communal open space:

In major developments, residents should have access to communal gardens where it will be possible to experience the seasons, enjoy plants and have the opportunity to engage in food growing themselves. And in doing so, given appropriately selected plants, make a difference to air quality.

User: SSE Entreprise Lighting

With regards the Plan for London the document sets out a vision and is a great basis for ensuring the deveopment of the great city of London. However as lighting professionals myself and my colleagues at SSE Enterprise Lighting have some concerns that lighting has not been considered in enough detail in this plan. The points below demonstrate areas were we feel further discussion would give a greater benefit an ensure that London and Londoners get the world class lighting they deserve.

- The current draft makes no reference to meeting relevant standards, only appropriate lighting. We would recommend that a Plan for London document should guide the user to the relevant standards e.g. BS5489 etc. and make use of professional publication from relevant industry bodies such as the ILP and SLL.
- The document it stands makes no reference to using competent lighting designers. We would recomend that it advises using only trained and competent lighting designers throughout to ensure that the lighting is of the highest quality and minimises any possible negative impact.
- Section 3.1.5 asks for measures to design out crime but makes no reference to the Secured by Design guides that already offer great assistance in this area.
- Section 5.5.7 should make reference to ILP guidance and relevant Standards for sports lighting.
- In its current form the draft offers little to no guidance on offering London and it residents appropriate lighting. The current draft offers lip service to the subject of lighting, without assisting in creating a document that will guide you to the best solutions.
- No mention of safety of the actual lighting equipment is made.
- No mention of ensuring that the lighting meets with the requirements of the London Boroughs individual lighting specifications.
- No mention is made of lighting being considered early within the design process. This is essential as for example landscaping can have a massively negative impact on the quality of the lighting if poorly integrated with a lighting strategy.
- Whilst Section 3.9.7 requires energy efficiency for the external lighting of tall buildings it has not been addressed in the other sections were it is equally if not more important. It is of especially high importance for 3.1.5 and 3.7.10 as they are addressing public lighting and this will be most likely council owned therefore ensuring the costs to the taxpayer is minimal is of paramount importance,
- All lighting should be referenced against sustainability and energy efficiency and as such climate change and carbon reduction commitments.
- No reference has been made to minimising sky glow, light trespass or nuisance lighting.

- Whilst section 3.1.5 states that development should “contribute to a sense of safety” and lighting is an element of this. No mention is made to how this will be achieve or that the lighting itself must be designed in a way as to ensure public safety, e.g. not installed in such a way as to create a hazard.

Without addressing the matters above the document will not assist in delivering high quality lighting to the public of London. To ensure that the document is of the greatest use SSE Enterprise Lighting would be happy to act as a consultant in drafting sections pertaining to lighting.

Best regards,

James Duffin

Lighting Designer

User: Twinn Sustainability Innovation

Design

Note: Generally, this chapter is very good, but the big issue is the design and management capability and capacity of the London Authorities and the boroughs to deliver it, monitor and maintain it all. Following Grenfell and Carillion there must be less reliance on the private sector to deliver this and the Mayor should be making working for London LAs popular again as in '50s and '60s with chief architects, chief planners and chief engineers in house with planning teams to make plans alongside the policies.

Fundamentally, planning officers have too little time and too little in-depth technical knowledge to make many of the judgements needed at pre-app stage and in support of planning committees. This also includes developments below the threshold for referral to the Mayor. Too much wasting time and money go on thick reports, which like the Grenfell recladding, have little meaning other than ticking a compliance process box (eg: current policy asks for assessment but does not define any expectations of minimum deliverable performance standards – hence 50% of homes may fail the BRE daylight criteria – but policy was fulfilled because the BRE methodology was followed). This is the case for daylighting, sunlight amenity, overheating (dwellings and non-domestic), wind & microclimate, actual measured energy use and the performance gap, as well as fire performance, etc.

The new London Plan needs to bring in a very definite change, to enable harder-edged default numerical standards expectations for all of these such issues (just as it does for 35% better than Part L for energy compliance). This then allows more design review time to be spent on architecture, urban planning, social issues and other less numerically defined aspects. Currently, of the very limited time available for design review, too much is side tracked onto these technical issues. Instead developers should provide written statements as part of the planning submission stating they will fully comply with all quantified minimum standards for all homes and other buildings. Then by exception developers must specifically draw attention to where, in exceptional site-specific situations, deviations occur and what mitigation measures are provided, drawing particular attention to planning officers and planning committees to the extent of these deviations and mitigation.

User:	Buckinghamshire County Council

There is general support for policies that encourage good design and good planning and development should be fit for purpose and respond to the changing needs of London and make the best use the city’s finite supply of land. The efficient use of land requires optimisation of density.

User:	Putney Society

CHAPTER 7: HERITAGE AND CULTURE

We welcome the recognition of the importance of Heritage with both a chapter and also references elsewhere notably in chapter **3 Design** and to some extent Chapter 4 Housing. This reflects the consensus that economic, social, environmental and cultural benefits derive from historic assets and surroundings.

We support the principle of this chapter to ‘inform the effective integration of London’s heritage in regenerative change’.

User: Home Builders Federation

Chapter 3: Design

We have several reservations about what the Mayor is attempting to achieve in his design chapter. We believe that many of the ideas for design are untested in terms of how they will contribute to sustaining housing delivery at the scale required in London over the next decade. While we accept that housing delivery should not be ‘at any cost’ – poor design should not be accepted - there is a balance to be struck so that the very considerable housing needs of the city are met in each year from 2019 onwards. If there is to be no relaxation on design and indeed the design review process is to be tightened by the draft London Plan, then perhaps it would be more sensible (not to say in the public interest) for the Mayor to admit that London will be unable to deliver 65,000 homes each year from next year onwards. High density development will require very careful design, and if this will need to involve design panels to review nearly all major schemes from here on in. We are unconvinced that this will be conducive to the Mayor delivering 65,000 homes each year.

If the Mayor is unpersuaded by the arguments that we will put forward in this section, then like other policies in the draft London Plan, such as his small sites assumptions and the 50% affordable housing target, then he must carefully monitor the effect of his design review panels on housing delivery. He will need to undertake an urgent review of the London Plan if housing delivery begins to seriously falter. The first test of the effectiveness of the London Plan is whether 65,000 net additions will be delivered in 2019 and 2020. There is no time for back-loading because the residual targets will just become impossibly big.

The proposed Housing Delivery Test would provide a means for the London local planning authorities to reflect on what is causing delays in housing delivery. Under the Government's proposals, under-performing local authorities are required to produce remedial action plans. These remedial action plans might conclude that the design review process is an important contributing factor to housing under-delivery. However, the findings of these action plans would have no bearing on the Mayor because they apply only to local planning authorities. This is a problem because it is the Mayor that holds the control over policy formulation in London and because he determines many major applications. We consider that it would be sensible for the Mayor to take these action plans into account (we have argued above that the Mayor does not have the authority to re-interpret the Housing Delivery Test in the way he proposes in paragraph 4.3.3). We recommend that Policy D2 of the draft London plan is re-drafted to include a section requiring the Mayor to consider the action plans that are produced by the under-performing London local authorities under the Housing Delivery Test. Where a local authority is required to take remedial action to improve housing supply the Design Scrutiny process outlined in parts E, F and G should be suspended until delivery is back on course in relation to the borough target.

Where the presumption in favour of development comes into play in those circumstances where a local authority has persistently under-delivered and is in severe deficit in terms of meeting its targets, then the Design Review process should be suspended indefinitely until a new London Plan is published.

We recommend that this should be introduced as a new part H coming after the current parts E, F and G.

User: EngineersHRW

Chapter 3: Design

Note: Generally this chapter is very good, but the big issue is the design and management capability and capacity of the London Authorities and the boroughs to deliver it, monitor and maintain it all. Following Grenfell and Carillion there must be less reliance on the private sector to deliver this and the Mayor should be making working for London LAs popular again as in '50s and '60s with chief architects, chief planners and chief engineers in house with planning teams to make plans alongside the policies.

Fundamentally, planning officers have too little time and too little in-depth technical knowledge to make many of the judgements needed at pre-app stage and in support of planning committees. This also includes developments below the threshold for referral to the Mayor. Too much wasting time and money go on thick reports, which like Grenfell, have little meaning other than ticking a compliance process box (current policy asks for assessment but does

not define any expectations of minimum deliverable performance standards – hence 50% of homes may fail the BRE daylight criteria – but policy was fulfilled because the BRE methodology was followed). This is the case for daylighting, sunlight amenity, overheating (dwellings and non-domestic), wind & microclimate, actual measured energy use and the performance gap, as well as fire performance, etc.

The new London Plan needs to bring in a very definite change, to enable harder-edged default numerical standards expectations for all of these such issues (just as it does for 35% better than Part L for energy compliance). This then allows more design review time to be spent on architecture, urban planning, and other less numerically defined aspects. Currently, of the very limited time available for design review, too much is side tracked onto these technical issues. Instead developers should provide written statements as part of the planning submission stating they will fully comply with all quantified minimum standards for all homes and other buildings. Then by exception developers must

specifically draw attention to where, in exceptional site-specific situations, deviations occur and what mitigation measures are provided, drawing particular attention to planning officers and planning committees to the extent of these deviations.

User: Royal Borough of Kensington and Chelsea

Chapter 3 Design

Generally, the design policies are highly prescriptive and appear to try and counter balance the potential adverse impact the greater thrust for delivery has from small sites and the modification of existing residential dwellings as outlined in Chapter 4.

An entire chapter dedicated to design sets out a commitment to delivering good architecture and place shaping and in principle is supported, as this implies that design is envisaged to take a more prominent role in the Mayor’s agenda. The focus on a design led approach, raising standards for housing quality and efforts to secure high quality design through to completion stage are welcomed.

User:	Kew Society

Chapter 3 Design

Policies on density should cross-refer also to the need to consider social infrastructures as well as transport, covered later in Chapter 5, as well as the need to preserve open and green spaces useable by the community.

User: Royal Town Planning Insitute

Level of detail

We are pleased to see linkages made between good planning and good design in this chapter. Whilst the content of the policies themselves make for excellent practice guidance, the level of detail is not appropriate for a strategic regional plan. There could be unintended operational difficulties through duplication of local authority design policies. Detailed design guidance can be useful. However it is more appropriate for Supplementary Planning Guidance or even Neighbourhood Plans, than the London Plan. A better approach for the London Plan would be to signpost to design guidance and focus on expressing general principles only.

Capacity to deliver design-led approach

While a design-led approach may ultimately be superior, it is likely to take longer, be more costly, requiring additional skills and resourcing at borough level. The Draft Plan should acknowledge this. A design-led site by site approach is labour intensive and our members have reported insufficient capacity at borough level to deliver this approach, as has the GLA's own analysis. The Mayor and GLA have reported that 91% of London Boroughs say they need more design, place shaping, urban design and architecture skills in their planning departments. At present the design policies do not set out adequately how it will address this issue.

Planners have shown they can regularly adapt to changes to planning processes and skill requirements. However, they should be given time, training, and support to access CPD opportunities. Budget and staff cuts have meant less space to develop new skills and less funding for CPD. We do not think the plan adequately communicates how the additional capacity needed to deliver this change will be resourced.

User: Eastcote Conservation Panel

Elsewhere in this draft plan there is great emphasis placed upon green roofs [this after existing gardens have been built on] For a building to have a green roof/roof garden it has to be flat. Therefore, the Mayor is proposing one style of building across the board, which will be cuboid in shape but with varying heights. This is not good design and will not enhance any ancient village or Metroland Town.

The lack of provision for quality amenity/ play space is disturbing. Green roofs/gardens are not suitable for children's use. Children need a safe play space that can be seen from the parental home. The loss of the ability for any human to have private, good quality outside space leads to many cases of poor mental health. This plan does not take this problem into consideration, in fact it will exacerbate the problem.

Little thought has been given to the building of basements. The geological conditions of any area must play a large part in determining whether or not it is suitable to excavate such a large area. Again one size fits all is not good planning. This whole subject needs a much closer investigation. Preferably it should be left to each local council to decide what is possible within their boundaries.

These sections as with many others in this plan needs to be reconsidered as per the comments provided by LBH.

User:	London Assembly Planning Committee

Design quality is fundamental to Good Growth. To accommodate this growth, London is seeing much more complex and denser schemes than in the past: some planned developments will build over 1,000 units per hectare. Making a success of these types of densities will require careful attention, guidance and scrutiny of design.16

4.2 Design review by independent professionals can be a powerful way of ensuring that the design of new buildings enhances London's cityscape as well as meeting users' needs, and is recommended in the NPPF. But there are differing approaches with varying results. This risks undermining Good Growth.

4.3 London needs more extensive and consistent use of design review. In line with the forthcoming Design Review Charter, existing design review panels that are delivering well should not be duplicated, and arrangements should be proportionate to the scale and impact of the scheme in question.

4.4 Good Growth calls for an active approach to shaping the changing character of places, rather than simply a reactive response to proposals. This process of 'place-shaping' requires a wide range of skills – including planning, urban design, architecture, landscape architecture, engineering, conservation, project management, community engagement. But 91 per cent of London Boroughs say they need more of these skills in their planning departments and the proportion of architects working in the public sector has fallen from 50 per cent in the mid-70s to less than one per cent today.17

4.5 Whilst most local authorities have clear visions for their areas, planning and regeneration departments have been depleted at a time of constrained funding. Many lack the resources and skills – coordinating investment, shaping development, galvanising communities and strengthening the character of a place – needed to achieve their ambitions.

4.6 This Plan provides the framework to address the key planning issues facing London. This allows boroughs to spend time and resources on those issues that have a distinctly local dimension and on measures that will help deliver the growth London needs. This includes area-based frameworks, action plans and Supplementary Planning Documents, site allocations, brownfield registers and design codes.

4.7 The Assembly again notes the introduction of a number of proposals that will require significant investment in a range of studies, reviews and assessments that can put the strategic London Plan policies into a local context.viii This, in itself, is a welcome contribution to the sustainable development of the capital through the plan-led system, but serious concerns remain that the boroughs have insufficient resources to undertake this work – and there is no indication of alternative funding resources that might deliver this capacity for local authorities.

User: Newham Union of Tenants

1.Our main concern is that the adoption of a ‘design led approach’ as a replacement for the specific policies on Sustainable Residential Quality contained in previous versions of the London Plan will not necessarily increase the output of new homes to meet the challenges of London’s population growth, and will not ensure that the new housing supply produced is appropriate to meet the full range of the housing needs of Londoners. Design is one of the tools to meet planning requirements but should come after the definition of preferred locations for higher density development and an assessment of the need for different types of development. A focus on ‘good design’ without clear design guidelines cannot be a substitute for setting explicit planning policy requirements. Id policy D6 remains, the intended content of a management plan should be spelt out more fully.

2.While there is a case for amendments to be made to the density policy, we do not support the removal from the Plan of the density matrix or the removal of the density compliance Performance Indicator. The matrix, which set out appropriate ranges for density of new development in terms of both dwellings per hectare and habitable rooms per hectare, which related to a) public transport access; b) the existing built form within an area and c) the relationship to a town or district centre, was an important tool in ensuring development density was optimised without compromising sustainable residential quality objectives and which provided a starting point for negotiations between developers and borough planning officers. While there is a case for reviewing the density ranges in the matrix, especially in relation to suburban sites with good public transport access and access to good social infrastructure, and a case for more explicit guidance on criteria for deviations from the appropriate range, abandoning the key policy control of development density is likely to facilitate further inappropriate development. This policy shift fails to acknowledge the relationship between development density and the type of new development output, in terms of built form, bedroom size mix and affordability. The facilitation of higher density development also has an impact on land costs which then has a negative impact on housing affordability. There needs to be adequate mechanism for ensuring higher density development meet the full policy requirements set out in the Plan in relation to build form, dwelling type, dwelling size mix, housing affordability, internal and external space standards and design standards in accordance with the principle of sustainable residential quality. This requires amendments to the draft plan policies and supplementary guidance, not just related to development and housing policies but also expanded guidance on delivery mechanisms and safeguards for private sector development set out chapter 11.

User:	London Waste and Recycling Board (LWARB)

1. We welcome the inclusion of the text in paragraph 9.8.16 which describes the key points which waste processing facilities should incorporate. This point includes references to key design features and therefore we would recommend considering this paragraph is moved to the design chapter and a reference to it within the design chapter is placed in this part of the document.

User:	London Waste and Recycling Board (LWARB)

1. We welcome the inclusion of circular economy design principles in the design chapter. Embedding circular economy into new and existing homes will assist in delivering the LES aims of becoming a zero waste city, and the vision to become a low carbon circular economy. To meet these aims it will be essential that the design and construction of new homes incorporate circular economy and the use of all resources.

User:	Canary Wharf Group

As a general comment, with the removal of the density matrix and a design-led approachto site optimisation, the plan places significant responsibility on boroughs to prepareevidence and new planning policies on densities and tall buildings and is heavily reliantupon design reviews. We are concerned that boroughs will lack the skills and resourcefor this additional work and moreover that the plan does not contain sufficient guidance for boroughs on the likely scale of development that will be expected.

User:	Kingston Lib Dems

The current London Plan has a density matrix but also makes it clear that this should not be applied mechanistically. We believe that removing the density matrix altogether will be detrimental to the suburbs/Outer London and will permanently alter the character of many Outer London areas. Some form of density matrix should be retained with reference to PTAL so that both Local Authorities and developers have better guidance as to what is acceptable and expected.

User: Create Streets

5. Encouraging, not banning popular high density medium rise ‘London-like neighbourhoods.’

There is nothing new in mixed use neighbourhoods and ‘living above the shop’. Yet London’s most familiar streets in Chelsea, Covent Garden and Shoreditch are very hard to replicate under current planning rules. One barrier is the technical requirements that come with each use class category. They can be challenging to combine in a mixed-use setting – such as the required distances between habitable rooms to avoid overlooking. This can force down residential densities which would impact reduce potential catchment for surrounding shops.***3***

Also making it hard to deliver ‘London-like neighbourhoods’ are specific rules or guidance on street design, daylight and sunlight, turning circles, access, staircases, on-street-parking, lifts and many others all of which collectively mitigate against high density low rise development. We have set these out in previous research as have others.***4*** The rules tend to have the unintended cumulative effect of ‘pulling the city apart’ with fewer bigger buildings further apart from each other. This is why so many recent London development feel so ‘blocky’ and unnatural. One experienced developed commented on a (locally very popular) development we were involved which increased the proposed density on a site while enjoying >95 per cent local support: “very beautiful. You’ll never get it through planning.” This is ridiculous.

To deliver density at a human scale and replicate the best of London, we need new guidance for urban areas which take into account available open space near the development, the benefits of traditional streets of various widths as an amenity and different building types at varying scales – terraced housing, mansion blocks and mid-rise flats. This will have very material ramifications for the next London Housing Design Guide. The GLA should also seek to change some Building Standards to permit medium rise high density ‘London-like’ developments.

3 Douglas Wheeler Associates (2009), Research examining the barriers to achieving mixed use development and identifying approaches to overcome these barriers.

4 See Boys Smith (2016), A Direct Planning Revolution for London?, pp. 22-7. London First (2017), Guiding Light: Unlocking London’s residential density

User: Environment Agency

We welcome the Plan's emphasis on good design, noting that this provides the essential context for optimising housing density. To help achieve 'good growth' further assessment will be needed by decision-makers to locally determine 'optimal' density.
We recommend changes to clarify what is meant by policy aims for 'high' sustainability, and that an evaluation of an area's capacity for growth must include coverage of water issues.

We welcome the policy objectives for the public realm. Notwithstanding that the Plan is read as a whole, we suggest that there is further scope for this chapter's policies to better integrate with, and cross-reference to, other policies across the Plan which will equally influence the design of both buildings and the places they create, e.g. Chapter 8 on green infrastructure and the natural environment, Chapter 9 on water management, flood risk management and sustainable drainage, and 'Chapter 10's 'Healthy Streets' approach.

Again, we suggest that the design policies could explicitly support policy GG6 above on the need for integrated solutions to infrastructure provision, and particularly support Chapter 9 in terms of integrated water management (that is, water supply, wastewater treatment and flood risk management), and water sensitive urban design.

User: London Councils

A significant shift in policy in this draft plan is an increase in focus on ensuring good design within the built environment. This approach will be welcomed by boroughs, who share the GLA's objective of ensuring good design. However, there are concerns that policies within this section may erode the ability of boroughs to protect and enhance the character of their neighbourhoods, especially to prevent high density development on small sites in suburban locations.

As already noted, policy within this chapter further proposes significant additional burdens for borough planning departments. For example, the design led approach to development management encourages boroughs to produce multiple design codes and increase the use of design reviews as well as carrying out more detailed monitoring of policy. The resources of borough planning departments are significantly stretched and further Government funding cuts will increase pressure. Producing design codes and the process of design review is also resource intensive, and the GLA could carry out an impact assessment which assesses boroughs ability to meet policy and add this to the evidence base.

Permitted Development Rights, which allow residential development to be delivered in certain circumstances without going through the full planning process, are having a harmful impact on the quality of design in boroughs. See SD8 for more on Permitted Development Rights.

User: Old Bermondsey Village Neighbourhood Forum

Community developments, site briefs and open spaces:
NLP should enable local communities to have greater power in identifying and taking on sites for community developments (limited presently to ACVs which have limited success aside from with Pubs) and in shaping the briefs for key local sites and public spaces.
Site Allocations in the New Southwark Plan for example are deeply unsound on all counts due to a superficial understanding of sites and vague wording resulting in incoherent and unsustainable briefs

User: London Borough of Hillingdon

Whilst the Council welcomes the Mayor's focus on good design, the policies are overly prescriptive on design detail and do not provide a strategic focus. As such, they are inconsistent with the purpose of the London Plan, as outlined in paragraph 2.2 of this response. The draft plan should provide general design guidance, as a framework for Boroughs to develop their own locally specific design policies.

The Council is particularly concerned that pressure to meet increased housing delivery targets, outlined in chapter 4 of the draft plan, will result in a profusion of poor design. The draft plan should provide a policy statement to confirm that this will not be supported and confirm that good design is a key aspect of sustainable development.

User: Westminster City Council

This chapter manifestly goes significantly beyond the proper role of the spatial development strategy. It should be recast so it demonstrably focusses on matters of genuinely strategic importance to Greater London. When the draft deals with matters like arrangements for window cleaning (paragraph 3.4.11), it is clearly moving not only into matters that are not strategic, but into a level of detail that most boroughs would deal with in supplementary guidance.

Questions of design are highly context-dependent and this is an area where it is particularly important that boroughs can tailor their approach to the demands of their areas and the neighbourhoods within them. There is no justification for the Mayor to seek to be so prescriptive not only about the objectives that should be sought in terms of exemplary standards of design but also about the process that should be followed.

User:	Ms R Farooq

Excessive housing densities in new development should be resisted to protect the local character of London’s neighbourhoods.

User:	Ministry of Housing, Communities & Local Government

Your Plan includes a number of detailed policies, for example of building design. Whilst these may be potentially reasonable in their own terms, cumulatively we are concerned that they could add up to a substantial regulatory challenge for the industry that will prevent the homes we all need coming forward. We have heard
concerns that the detail and complexity of the policies within the draft have the potential to limit accessibility to the planning system. This would, of course, be a significant issue for many of the small to medium sized developers that you are depending on to deliver the step change in housing supply that London so clearly needs. We would urge you to listen to representations on this point, and would be interested in your assessment of the cumulative regulatory impact on the market.

User:	Alison Hatt

I cannot see (although it may be there) any consideration of the benefits and problems of paved front gardens. There are environmental concerns here. While it is good to have vehicles off the road, the reduction in green space, habitats and support for wild life is problematic, as is rainwater drainage. People cannot be co-erced into gardening, but it sits oddly with your desire for people to enjoy green spaces not to include ideas about increasing greener domestic spaces.

User:	London Borough of Enfield

1) Developers may be able to use the Plan to easily justify single aspect dwellings, provide insufficient daylight and sunlight and provide less than acceptable outdoor amenity standards for housing.
2) Boroughs do not have the resource to establish the most appropriate form of development for all potential development sites through their Local Plan.
3) Concern about the removal of the density matrix as it gave some easy to follow guidelines around the direct relationship between public transport connectivity and suitable density.

User:	Royal Borough of Greenwich

We fully support the draft Plan’s new approach to design, which correctly recognises that good design is indivisible from good planning. We agree that the design-led approach will ensure that proposals are appropriate to the local context and also based on existing/planned infrastructure capacity. We support the Mayor in seeking clear minimum space standards and taking a stronger stance than the current plan on residential design quality. We believe this is essential to delivering high quality homes for Londoners.

User:	London First

Density, design and tall buildings – with the removal of the density matrix and a design-led approach to site optimisation, the Plan places significant responsibility on boroughs to prepare evidence and new planning policies on densities and tall buildings, and is heavily reliant upon design reviews. We are concerned that boroughs will lack the skills and resource for this additional work and, moreover, that the Plan contains insufficient guidance for boroughs on the likely scale of development that will be expected – for example, in safeguarding against local policies that set conservative densities or design parameters, such as building height, which could constrain an area's growth potential. The Plan should therefore provide more specific guidance on these issues.

User: London First

Proposed new policy D14: on Density, Daylight and Sunlight

In 2017, in partnership with GIA, London First published ‘Guiding Light: unlocking residential density’, a report which called for new approaches to daylight and sunlight for London in order to deliver more homes through higher-density development.
The most commonly used guidance on daylight and sunlight is published by the Building Research Establishment (BRE). It contains nationally applicable best practice guidelines on the levels of daylight and sunlight that existing and new development should follow. Whilst it recommends a more contextual approach and setting alternative target values for city centres, urban environments and historic locations, it crucially does not set out what these are.

In the absence of this guidance, a ‘one size fits all’ approach is taken by many boroughs, resulting in the same daylight and sunlight targets appropriate for a development in suburban locations being applied to developments in Central London. This impedes London’s ability to make the most efficient use of its land, resulting in low site coverage and greater separation distances between buildings. Most importantly, it hinders London’s ability to deliver the volume of homes that its population needs.
We support the recommendations of GIA and the London Property Alliance that an additional policy should be included in the London Plan that provides a more appropriate site-specific approach to daylight and sunlight and their effect on residential amenity, including similar typologies of other sites or developments as comparables. This approach was supported in a recent appeal decision for a site in Whitechapel (APP/E5900/W/17/3171437).

Policy D14 – Sunlight and Daylight

A. New development should avoid causing unacceptable harm to the amenity of surrounding land and buildings, particularly in relation to privacy and overshadowing and where tall buildings are proposed. An appropriate degree of flexibility should be applied when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties, as well as within new developments themselves.

B. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account all relevant local circumstances; the need to optimise residential or commercial capacity; and scope for the character and form of an area to change over time.
C. The degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential, mixed use and/or commercial typologies within the area and of a similar nature across London. Decision makers should recognise that fully optimising housing or commercial potential on large sites may necessitate standards which depart from those presently experienced but which still achieve a satisfactory provision of amenities and avoid unacceptable harm.
D. BRE guidelines on assessing daylight and sunlight should be applied sensitively to higher density development in a city centre, particularly in central and urban settings, recognising the London Plan's strategic approach to optimise housing output and the need to accommodate additional housing supply in locations with good current and projected transport accessibility. In those areas, quantitative guidance on daylight and sunlight should be derived after careful consideration and by demonstrating how the levels within the proposal measure against broadly comparable (and successful) urban grains in higher density areas within London."

User: Kennington Oval and Vauxhall Forum (KOVF)

The built form of GoodGrowth

The DLP is notable in removing many of the constraints on tall buildings, in the name of intensification and maximising use of land, to facilitate the increased housing targets. Faith is put instead in the “Design approach”. We have already seen the effects of such an approach in Vauxhall, where developers in the Opportunity Area have broadly set aside development plan or OAPF requirements as to height, density, employment floor space retention and affordable housing obligations, while bringing forward tall towers all declared to be of impeccable design. Here are the results:

(Please see word doc for images)

Overshadowing will be a major area of contention under the DLP, with its remarks that most development will be denser than its neighbours (even in Conservation Areas?), and willingness to see extensions of blocks of flats upwards, even while existing occupiers continue to live in the building site that it will become. In our area we have seen a number of developments, some with admirable features, trying to justify major adverse impacts on neighbours’ sunlight and daylight as “only to be expected in an urban area”. This argument has had short shrift from the inspectorate. As regards sunlight and daylight, at present the DLP shows more consideration for ducks and the operators of solar panels than it does for resident Londoners (see DLP policies D4F no reference to sunlight and daylight of **neighbouring** properties, D8C2 g) and D8C3a) solar generation and enjoyment of water spaces around tall buildings).

15 Policy 7.6 Architecture of the existing London Plan provides as follows:

“7.6B D Buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings.”

This sentiment has been omitted from the DLP, and we think it should be reinstated in the Design policies.

Annex 1

Our KOV area straddles the CAZ and Congestion Charge boundaries, and contains as its western riverside borderlands, stretching from Vauxhall up along the Albert Embankment, the northern part of the Vauxhall Nine Elms Battersea Opportunity Area. KOV residents are now gradually coming to terms with being treated as part of [South] Central London.

The recent intense decade of development in the Opportunity Area, (now rebadged “Nine Elms on the South Bank” for promotional reasons, to the irritation of the indigenous population), was triggered by approval by Ministers in 2005 of the 180m tall St George Tower, contrary to the advice of Lambeth Council and the Planning Inspector, who expressed concern that, cumulatively, the indiscriminate scattering of very tall buildings across the skyline would be likely to cause visual harm to the Westminster World Heritage Site.

The cumulative subsequent development of successive tall residential towers (“the Vauxhall Cluster”) has indeed become a byword for seemingly ungovernable urban sprawl, albeit upwards, rather than outwards, with developments regularly breaching development plan “guidance” as regards some or all of height, density, and retention of employment floorspace, while providing little mitigating public open space, and justifying “under plan” levels of affordable housing by confidential economic viability studies, never exposed to public scrutiny.

We have areas of significant social deprivation and joblessness, interspersed with Victorian and Neo-Georgian conservation areas, long the haunt of economical MPs within the Division Bell area. Apart from Vauxhall, where a small CAZ frontage is struggling to be born, our retail centres are threatened by edge of centre approved Tesco’s (3, in the case of Kennington!) over and above the current challenges of retail decline. And despite the need for jobs that our jobseekers can do, developers seek to eat away at our Locally Significant Industrial sites, for residential development, even given Lambeth’s “Restricted Transfer” status under the current London Plan.

The St George Tower itself is now exposed as the poster child for high status, low occupancy residential property, predominantly owned and kept vacant by foreign investment interests. At a residential density of 0.3 persons per dwelling, it emphasises the inefficiency of “iconic” tall towers at servicing demographic demand for accommodation. And the detested Vauxhall Gyratory, which gave the area a “harsh, traffic dominated” character, and made Vauxhall just a “secondary” office location, in the eyes of the professional property community, is only now being tackled by TfL, whose plans have attracted significant local controversy, while being linked to the development of an even taller set of towers, once again breaching OAPF development guidance.

But the upside of this intense burst of development, with new uses and occupiers springing up, has been a quickening of external interest in the area as a whole, and in particular in Vauxhall. With the benefit of an outward looking Business Improvement District, Vauxhall One, whose 5 year mandate has been renewed by its constituent businesses, business now has a much more coherent voice, and its efforts have leveraged in significant extra funds to improve the public realm. The residential developments have spruced up at least their surroundings, with a promised cinema and swimming pool to come. Since the adoption of a Community Infrastructure Levy (CIL) charging schedule by Lambeth Council in April 2014, developers are beginning to pay much more realistic sums to mitigate the impact of their developments in terms of improvements to infrastructure, and the 25% local component of CIL, earmarked for spending in the KOV area, is estimated at about £15 million over the next decade,

The pressure of development is now moving eastward towards the decommissioned Oval Gasholder sites, whose size allows for more comprehensive and balanced development than has proved possible so far with the piecemeal development of smaller sites in the Opportunity Area. So our vision for the rest of the KOV area is to build on the positives and learn from the mistakes, implemented through a Neighbourhood Plan .

User: Neighbourhood Planners

4 Good process and good design leads to good growth

4.1 Through a combination of neighbourhood planning and more active involvement in early stages of the development management process (in those Boroughs which support such practices) London's citizens are becoming more aware of how 'good design' of a sustainable and successful city goes well beyond the appearance and layout of its buildings.

4.2 There is opportunity for a London Plan to take a stronger line on what constitutes meaningful community engagement in planning London's future. Draft Policy GG1 in the New London Plan, on Building Strong and Inclusive Communities goes some way towards this. But the wording that directs this policy towards "those involved in planning and development" undermines any sense of true inclusion (see above for recommended wording change).

4.3 'Those involved' are not just a limited circle, but all Londoners who live, work, and travel within the city created by the interactions of planners and developers. The new London Plan needs to promote policies on the early engagement of Londoners in the design of individual developments, as well as the design of their local neighbourhoods.

4.4 There is good and poor practice across London Boroughs, and the two Mayoral Development Corporations, on the early engagement of the public in plans for new developments. There is also an enormous amount of time and money spent by developers on preparing Statements of Community Involvement that are often little more than a tick box exercise to be submitted alongside a planning application.

4.5 A new London Plan could usefully promote policies that encourage more meaningful forms of early engagement, including wide public involvement in design review panels and development management forums. Some form of service delivery structure, independent of planning authorities and of developers, would be hugely valuable as a London resource on which neighbourhood forums and amenity groups could call.

4.6 The Good Growth by Design initiative, and the appointment of 50 Mayoral Design Advocates, have the potential to be positive moves in this direction. It is early days yet, but to date the neighbourhood planning community in London has seen little evidence on the ground of this particular initiative.

4.7 Not all London Boroughs operate Design Review 4.7 Not all London Boroughs operate Design Review Panels, and in those where these

Chapter 4 Housing

User:	Mr. Paul Scott

I amongst many other residents object to the plan for having higher rise and increased density developments in the outer suburban London boroughs which have seen enough of them already. The Grenfell Tower tragedy proves that tower block and the associated high density living that goes with it is not a particularly safe or desirable option in which to house the residents of the future. Really, suburban town centres ought to consist of low rise buildings primarily used for retail and leisure with greenery around them for health and environmental reasons. Also tall buildings tend to block daylight and create wind tunnels as well as overshadow the historic environment and historical structures too. Therefore the Greater London Authority should concentrate on preserving the character of London suburbia which includes open spaces and back gardens for the benefit of those people who will residing here within the next few decades.

User: Mrs Rozita Williamson

I live in Havering - specifically Harold Wood. The immediate and surrounding area is already far too cramped, with too many houses for the facilities and infrastructure available. The main issue with adding new developments in greenbelt is that it is making the roads that are already exceptionally busy and overloaded, in particular during peak times, even worse. Roads are mostly single file in the area. So, any additional traffic by adding new houses not previously there, is that it pushes traffic further back making it impossible to get anywhere especially during rush hour/school drop off and pick up times. In a recent report too we understand that Havering has the largest amount of cars per household across London, so you can imagine this will only make it worse. This is not surprising due to its semi rural/semi urban location, meaning cars are necessary, especially for many families with young children, so it is only likely to get worse if more housing development applications are approved.

Also, as a parent, it is already near impossible to get a doctor's appointment and school and nursery places are limited. Any new developments will make it even harder.

This needs to be a strong consideration in what is already an unrealistic target for housing for Havering as a whole. It is unfair to make small towns/villages such as Harold Wood to bear the brunt when the infrastructure is not tallying it at the same rate.

Regards,

Rozita Williamson

User: Mr Hal Luke Savas

It is my belief that lands parallel to M25 motorway should be developed first, for upto 2 miles deep on both sides, as hub&spoke developments, as there are a lot of empty lands, at least visible to eye whilst driving (maybe agricultural but does not look like it). We can not just pile everything up within the existing space as even the new developed sites are soon becoming crime hotspots, deprived no-go areas et al.

We must also build homes like we build cars, not always from bricks and mortar but from modern building methodoliges, including pre-engineered laminated wood and light gauge steel frame.

User: Mr Derek Jones

Yes. There is a shortage of housing units in London. So it is easy to say, just build more houses. The mayor wants to build circa 60K new homes a year for the next 10 years. 650K in all, to house (say)1,3million adults due to the anticipated increase in London's population. In a short time that will mean there will be a requirement for additional schools for (say) an additional 1.3 million pupils. That is 1,300 additional schools, and 130,000 additional teachers/support staff. Probably 5 new hospitals, another prison, etc etc.

Many terraced houses built in London towards the end of the 19th century are now of a poor standard and the utilities serving those houses are under enormous stress.

The mayor wants to build in peoples gardens to increase the housing supply. Well that is already happening in some boroughs in a clandestine manner with squalid results.

A mayor who really has Londoners at heart would be seeking to reduce the population of London not increase it, thus sparing us all the inevitable overcrowding and conflict which an increased population brings.

Building an additional 650,000 houses over 11 years will just increase the number of people who are drawn to London. And what happens after that...another 650,000 houses?.

London is already full of people . London cannot cope with anymore.

User:	Your London Base

I represent Your London Base a company that is looking to bring in small purpose built blocks of high quality HMOs. Our product has been given the backing of your consultants BNP Paribas Mr Anthony lee. We have met with Jaime Ratcliffe and would welcome working with the GLA.

we want to revolutionise the HMO market, we feel it’s no longer fit for purpose, ours is a interim housing product to help get people on the property ladder.

We can increase density, reduce rents and house more people in quality accommodation.

Happy to help and explain more

User: Mr Bob Phillips

I applaud the intention to raise the targets for building housing, even though my Borough, and, I guess, all of the other outer London boroughs, are complaining that the targets are too high. London desperately needs mors family housing. It needs more gebuinely affordable housing, yes; but over and above that, the housing supply must grow.

In compensation for making Boroughs like mine - Kingston - cram more housing into the available space, the Mayor and the Government must expropriate all the completely dysfunctionla housing that has been built in central London for rich investors who now do not want to invest. This must be taken away from all those greedy financiers who only built them for their personal gain, and converted to use for people who really need housing.

User: Ms Katherine Woolf

With affordable rent meaning "up to 80% of market rent" the commitment to 50% affordable housing is almost worthless.

For example, I live on the street I was born on, and on which my parents still live. Market rent for my two bedroom flat would be over £3000/month. Both my partner and I work full time and have a joint income of over £100,000/year. We have two young children in a private nursery (the local authority nursery being full). We could not afford to live in the area I have lived in all my life, on the same street as my parents and my close friends, if my rent were an "affordable" £2,400/month ie 80% market rent. Instead, I am lucky enough to live in a fully mutual housing cooperative. We manage ourselves on a voluntary basis and set *truly* affordable rents which provide the co-op with sufficient income to manage our properties to a high standard. We also support a diverse and cohesive community - unfortunately increasingly rare in London.

People in skilled, semi skilled, and even professional jobs - who make a huge contribution to the London economy - cannot afford 80% market rents in most parts of London. Either private rents need to be capped (which seems unlikely) or the Mayor needs to redefine affordable rent as meaning something truly affordable to the people who work in our hospitals, schools, creative industries, academia, and shops. Who clean our streets and who care for our elderly population.

A better definition of affordable rent would be a third of the joint income of two people working full time and earning the London Living wage. Or 50% of market rent, whichever is lower.

The Mayor should also support the creation of more fully mutual housing co-operatives. These member-tenant run organisations encourage community cohesion and self-sufficiency, and provide truly affordable housing. Our co-op also houses people on the local authority housing list as payback for the original grant provided to buy our properties from the freeholder.

User: Mr Alexander Thomas

While I fully support the need for more housing in the London area, I am disappointed that the plans did not seem to make prominent mention of protecting the unique character and history of each borough. Certainly, a "one-size-fits-all" approach should be avoided.

Additionally, my home area - Richmond upon Thomas - has suffered from a serious shortage of primary and secondary school provision and this must go hand in hand with any significant increase in the local population through expanded housing capacity.

User: Ms Carol Ackroyd

The London Plan must reject the use of NHS sites for housing as proposed in the Government's Naylor Report. The Naylor report recommends that up to £5.7bn of NHS sites (the most valuable being in London) be sold and much of the space used for new housing development.

However the proposals represent a scandalous firesale of precious NHS property and sites. The definition of 'underused' (set out in the Carter report on efficiency) is based on a meaningless measure – such that, for instance, laboratory space or play space for children can result in a building being designated 'inefficient' and categorised for sale. Most importantly, the sale of NHS estate is **proposed in the complete absence of any national or local NHS estate strategy**.

Local authorities are encouraged to support the sale of NHS land through the promise of land for housing. The London Plan must stand out strongly against this proposals.

NHS campaigners including Keep Our NHS Public (KONP) and the unmbrella group Health Campaigns Together (HCT) have proposed the following strategy for use of NHS land. We hope this approach will be adopted within the London Plan.

WE WANT THE FOLLOWING BENEFICIAL USES OF NHS LAND

Any NHS land that is not in clinical use at present should be used for health and wellbeing purposes, to be considered in priority order, as follows:

1. The NHS should consult fully and agree plans with local people. It should identify any land that may be required for expansion or rebuilding of existing hospitals or clinics, or needed for publicly-provided shared health and social care. This land cannot be sold.

2. The NHS should build "step-down care" and rehabilitation centres to care temporarily for the 6,000 patients who are medically fit, but still need care and are occupying expensive acute care beds. Figures show that this would pay for itself in only one or two years, and is far better value for money than selling land.

3. Land not needed for NHS care should be considered for publicly-provided social care, or used to build low rent housing for NHS employees. This would improve recruitment, reduce length of journeys to work, and reduce fatigue for NHS staff, so improving patient safety, and releasing the housing presently occupied by the rehoused staff.

4. Publicly-owned supported accommodation for elderly and vulnerable people should be developed on remaining NHS land, near to medical facilities, to meet the acute need for such homes. This would also free up housing occupied by vulnerable people for use by others.

5. Any remaining NHS sites should be used for social housing, provided at genuinely affordable rents. The destructive “right-to-buy” policy that has depleted the affordable public housing stock since the Thatcher era should not apply, and in any case should be abolished by legislation.

6. Any NHS land that is not suitable for the purposes above should be included in a local public land bank, to be considered for land swaps under the direction of the local planning authorities to improve the quality and allocation of public land.

Only after full consideration of all these uses (in priority order) should NHS land be released for commercial sale. All money from sales should be paid into NHS capital accounts and used for buildings and maintenance, not to compensate for NHS revenue underfunding.

STOP ALL SALES OF NHS LAND UNTIL NATIONAL AND LOCAL ESTATE STRATEGIES ARE AGREEDWITH FULL PUBLIC CONSULTATION AND A VOTE IN PARLIAMENT.

User: Whitgift Estate (East Croydon) Residents Association

WHITGIFT ESTATE (EAST CROYDON)

RESIDENTS ASSOCIATION

Chairman: **Gerry Meredith-Smith**

Hon. Secretary: **Roy Colbran**

Hon. Treasurer: **John Hayward** **49 Upfield CR0 5DR** **Tel 020 8654 4328**

Assistant Hon. Sec: **Daphne Fernandes**

Comments on behalf of this Association on the Draft New London Plan

We wish to comment on Section 4, housing requirements.

1. **Overall Targets:** We note that the SHMA identifies the need for 66,000 new homes per year while the population increase is shown as only 79,000 per year. While we do not have the time or the resources to analyse the SHMA in detail, it is clear that these figures are based on projecting current trends. Alternatives are indicated though varying only to a small degree from the progression adopted. No consideration appears to be given to the possibility of a more dramatic change in the recent trend. The dangers of simply extrapolating a trend and assuming it will continue unchanged into the future are ignored. SHMA also shows how the population of London declined over 50-year period. There are all kinds of reasons why the recent trend might change. The most obvious are the effects of Brexit, but there are also the development of the Northern Powerhouse and the possibility that transport in London becomes so intolerable that people tend to move away. It follows that the projections and perceived needs set out in the Plan are being presented with a degree of accuracy which is clearly spurious and plans should be formulated covering a wide range of possibilities.

2. Furthermore, the small difference between the projected population increase and number of homes needed indicates that there will be a major catch up on the backlog in the 10 year period. We believe that this is unrealistic.

3. **Small Sites** Policy H2 B says “local character evolves over time and will need to change in appropriate locations to accommodate additional housing provision and increases in residential density…” This appears to be a euphemistic way of telling us that we must accept infilling wherever developers see an opportunity regardless of the impact on the neighbourhood. Seeing the way in which Croydon plans to implement the new targets, this is going to lead to a mishmash of housing spoiling pleasant and attractive existing areas. The way to dramatically intensify development is what was done in our neighbouring Park Hill area when large Victorian houses were demolished and replaced by a whole estate with a much greater density of population.
4. **Infrastructure – water** paragraph 9.5.1 admits that London is already severely water stressed. A recent news item on the BBC website told us that London is the ninth most likely city in the whole of the World to run out of drinking water! Paragraph 9.5.4 tells us of four ways of increasing water supply which are “under consideration”. Elsewhere the website of the Chartered Institution of Water and Environmental Management tells us that it can take up to 25 years from inclusion of a reservoir in the water resource plan to reach final completion. Thus it is evident that plans for increased housing are running significantly ahead of provision for an adequate water supply for them.
5. **Small site expectations for Croydon** Table 6.7 of the SHLAA shows that Croydon is expected to provide substantially more housing on small sites than any other borough. The chapter shows that Croydon has in the past been more successful than others in providing development on small sites but what is now expected is unreasonable. The northern half of the borough is already intensively developed which means that most of the extra provision would have to be in the southern half. We do not believe that there is any way that these numbers can be achieved in consistency with paragraph 4.2.8. of the Plan.
6. **Our Local Plan** As recently as March 2016, the revised London Plan increased Croydon's housing requirement and as a result our Council set a strategic target to deliver 31,850 homes over 20 years. By requiring 29,490 over 10 years London is almost doubling the requirement and setting at naught all the effort that have gone into our Local Plan, now on the point of final adoption. The Inspector was very happy with what Croydon had done in the Plan as regards housing targets.

Overall we conclude that housing targets in the Plan both overall and for Croydon in particular have been set at levels which are unreasonable and unachievable.

User: Mrs Gill Slater

I generally support the optimising of housing but I am writing to object to what I consider a key ommission which would support this optimisation of housing development.

Meeting the significant increase in the small sites target will rely heavily on the development opportunities arising from infill development within the curtiage of houses, however there does not appear to be any policy control to prevent schemes designs coming forward on one piece of land from effectively landlocking other potential sources of development. This should be a key plank of the proposed design codes but ideally set out in policy (either design policies or small sites policy)

Additionally currently landlocked suburban sites, which are genuinely developable, but where lack of access through another potential site, currently prevents development, should be listed within the brownfield register. Policies / design codes should then resist designs on adjacent land which do not facilitate access, and would effectively sterilise the landloacked sites from future development. Only by optimising the potentail of such sites will the Mayor and borough be able to meet the good growth housing necessary to meet the undboubted housing need without the loss of open spaces / Green Belt.

The Brownfiled registers should enable land owners to register sites with genuine development potential subject to securing appropriate access. London Plan policies should then require development schemes to take account of such registered sites adjacent to their proposals to ensure that their designs do not jeopardise access to the registered sites, prevently them from coming forward to deliver residential development.

Our developemnt opportunity (or not) is doubtless replicable across suburban London which the draft London Plan relies upon heavily to meet the housing need 90 / 92 Shirley Road CR0 7EQ - Self build potential for sympathetic flatted / maisonette development accross the 2 double width extensive rear gardens stretching back to meet an area of historic nurseries (now lock up rental garages) within the centre of a traditional 1930s suburban block. The lock up garages have direct onto Craven Road and will no doubt come forward in the short / medium term to provide residential development. The lock up garages site holds the key to access for the rear of 90 / 92 Shirley Rd and a design on the lock up garages site could either facilitate or prevent selfbuild on the extensive garden sites. There is no current proposal on the lock up garages site, however, a policy requirement to ensure access to the 90 / 92 Shirley Rd gardens will enable them to assist in meeting the small sites targets.

User: Ms Lynda Curtis

I am a member of Onslow Gardens Residents Association, an organisation that represents 600+ households in the South Wallington area of the London Borough of Sutton. This area has been named by the London Borough of Sutton is an Area of Special Local Character and as such, should be protected from the overdevelopment described in this plan. These plans fly in the face of a locally led and locally agreed plan for our area; a plan that has been consulted on and agreed to by residents of Sutton. The Sutton plan carries its own, very challenging target for new homes. The proposed plan for London will change the nature of our communities in terms of stress on local amenities (schools, healthcare, transport) and also the local character of Sutton. We disagree with the proposal to intensify housing in this area and the whole of outer London in the manner proposed. It will substantially and negatively alter the character of much of the suburbs. What makes the suburbs attractive is the housing being better spaced out than inner London and the gardens are bigger, giving a sense of peace and space. These proposals to intensify outer London with infill and back-garden development, demolition of large family houses to be replaced with blocks of flats, and residential conversions, will completely change the suburbs and make them into an identikit of inner London. To encourage building on gardens will adversely affect the natural habitat and local wildlife. Given that we need more green spaces we must respect and preserve those we have. Installing green roofing will not counteract this loss! We would in particular object to the small sites element of the housing target, which has been arrived at based on a % increase in housing units in areas of high public transport accessibility and near town centres. It has no regard to the individual character of those areas, beyond whether or not they are in conservation areas. There are also other areas of local character where the impact of this small site infilling will adversely impact on the general street scene. The identification of the small sites should be undertaken in consultation with local councils and amenity groups. There is clearly a lack of social housing in inner London. New homes have in fact have been built but these have not met London’s very real housing crisis: rather, they are unaffordable and built to make money, not to provide homes. This plan seeks to push the issue on to outer London boroughs, which we deem unfair. The plan itself is very difficult to understand if one is not versed in planning nomenclature. Therefore it is not a consultation in the sense that an ordinary member of the public can understand it. For example: “proposals to increase the density of existing residential homes within PTALs 3-6v” is not explained. Also, the short turn-around time could be perceived as wish to rush though something, rather than a genuine consultation exercise. This does not feel like a two way process. While we would support the general move towards reduced car use and promoting public transport and the healthier alternatives of cycling and walking, we do not support the proposed maximum parking standards. The area that we represent is immediately south of the Town Cente and has PTAL values of between 2 and 4. That means that maximum parking provision for new residential developments ranges between 0.5 and 1.0 parking space per unit, as shown in Table 10.3. The lower levels are likley to create additional pressure on on-street parking, which is already at a premium. Also of concern is the requirement for all residential development in areas rated PTAL 5 and 6 to be car-free. The local Wallington station and town centre are currently PTAL 4, but if in the future

services are improved it is highly likely that it would move into PTAL 5 or 6. Car free development would then again increase pressure for on-street parking in the adjacent residential areas. Proximity to a suburban station in outer London offers far less travel options than stations in inner and central London and this should be reflected in the policy. Local Councils should be allowed to set their own parking standards based on local detailed knowledge of their areas. With the London Plan setting a higher maximum level below which the local council can set a standard based on local characteristics.

User: Park Hill Residents Associations

PARK HILL RESIDENTS ASSOCIATION

THE LONDON PLAN - HOUSING

We are a Residents Association in East Croydon representing some 2,600 households. Most of the area was redeveloped in the 1960s and 1970s replacing Victorian villas with a mix of houses and flats of different sizes . The area is notable for its landscaping. The developers (Wates) sought to preserve as many trees as possible and to combine open spaces between high-density developments.

2. Against this background we are concerned at the size of the housing targets for Croydon and in particular the targets for small sites. Under the Plan, Croydon's housing target in a 10 year period would be increased from about 14,000 to nearly 29,500. Of these 15,000 would be from small sites- far larger than in any other London Borough. Moreover a good deal of our area lies within 800m of East Croydon station and the section of the Plan on small sites encourages more intensive development of dwellings within this sort of area - such as conversion, extensions, infilling (see para H.2.D). We are very concerned at the threat this could cause to the fabric of the area, removing the islands of green space which are an essential feature of it and destroying its architectural character.

3. We are also concerned that new developments meet the needs of the population. Too many of the new developments in Croydon are of small flats which are quite unsuitable for young families. We desperately need family homes and also homes which would be suitable for older people who wish to downsize but are not ready for care accommodation. We welcome the recognition in paragraph 4.15.9 in the Plan of the needs of this group. But we are concerned that the very demanding targets will lead to a focus on the smallest possible properties. There should be some control on the mix of housing.

4. We are not opposed to redevelopment as such. Most of us would not be living here if this area had not been redeveloped. But we do not think that the plans should impose such heavy burdens on Croydon and place such weight on small sites. We think that if the needs of Londoners cannot be met by brownfield sites, the time has come to review the Green Belt and Metropolitan Open Land. Not all of it deserves to be retained indefinitely.

JOHN INGMAN

Chair, Park Hill Residents Association

26 February 2018

User: Mr Daniel Willis

Housing

Community Links applauds the Mayor's plans to embark upon an ambitious house-building strategy to tackle the current housing crisis. The new Plan's ambitious targets for house-building in Newham, higher than any other Borough, are a recognition of the drastic need for greater provision of affordable homes in our local area. However, our organisation is also concerned at the possibility that housing will not be developed in accordance with the principles of "Good Growth" and will lead to the displacement of low-income and BAME families from Newham. Social homes should be priced at rates affordable to local people. As we have found from conducting research with local organisations such as the Magpie Project in Newham, there is also a need for a greater quantity and quality of temporary accommodation.

Newham has experienced vast redevelopment and regeneration over the past decade; particularly in the Lower Lea Valley, Royal Docks and Beckton Riverside areas set out in the 2011 London Plan. Research has shown that the regeneration of Stratford has displaced low-income families from the area. Furthermore, local residents believe that new developments were deliberately designed to exclude them and attract affluent, incoming residents to the area. Through our community programmes, advice services and research projects, we are now hearing similar concerns from residents about regeneration schemes in Canning Town and Silvertown.

Housing inequality is both a "symptom and a driver" of wider inequalities in London's economy, including health inequalities. Whilst we welcome the Mayor's ambitious strategy, it is crucial that the new Plan's housing offer aims to deliver a more equal society with more affordable housing, without displacing London's diverse communities. Community Links supports calls from My Fair London and the Local Government Association to set "affordable rents" at 30% of household income (rather than 80% of market rent). We endorse the proposals by Just Space that the Plan should explicitly make clear "with reference to housing costs and incomes, [how] the housing needs of households with less than median income levels will be addressed". Furthermore, we call for: longer-term tenancies to provide stability in the Private Rented Sector (PRS); the mandatory licensing of landlords; and a review of housing standard enforcement in the PRS in order to increase the quality of housing.

Paul Watt (2013). "It's not for us": regeneration, the 2012 Olympics and the gentrification of East London. *City* 17 (1), pp. 99-118.

My Fair London (2017). Housing and Inequality in London: Building a Better London for all Londoners. My Fair London: p.3.

Ibid. p.4; Patrick Collinson (2017). One in seven UK private tenants pays more than half income in rent – study. *The Guardian*, 3 Jul 2017.

Just Space. Towards a Community-Led Plan for London. p.33.

User: Brett Group

Dear Mr Mayor

London Plan

As a major player in the aggregates sector, Brett Group is delighted with the planning agenda set out in your Draft London Plan. It is a tremendous endorsement of the sector's ongoing contribution to London's economic propserity.

We look forward to working with you in the months and years ahead to help you deliever your housing and infrastructure agenda. If you would like to visit a wharf we would be delighted to be your host.

Yours sincerely

John Burnett

User: Rogers Stirk Harbour+ Partners

Dear Sadiq

It was a pleasure to welcome you for supper and a helpful discussion of design and housing in London last month.

Since then, you have published the draft London Plan, which is a truly impressive document, with some welcome changes in policy and emphasis from its predecessors. I have not yet reviewed the plan in detail, but I was particularly pleased to see the prominence given to design, the emphasis on intensifying the suburbs, the string links between infrastructure and development, and the tougher approach to affordable housing provision.

What concerns me is how we will be able to deliver this scale of ambition with the dysfunctional housebuilding model that has been underperforming for years, with volume housebuilders lacking any real incentive to accelerate delivery. I note that there are references to viability assessments being triggered if planning permissions are not built out, to more build to rent provision and to using smaller builders.

These are all welcome measures, but I feel something more radical will be needed - in terms of securing land, incentivising faster building and boosting public investment. I understand you have already asked the Government for more investment. I believe you also need to press for stronger powers of compulsory purchase, including the power to buy land at existing use value, or at least to share in land value uplifts created by planning or infrastructure. You should also be able to tax sites with unimplemented planning permission on an ‘as built’ basis - either through the existing council tax regime, or through a longer term move towards land value taxation in London. Finally, you should ask the Government to put housing benefit rises on a stable, index-linked footing so that councils and housing associations could borrow to invest.

There may well be other measures worth advocating, but I would be keen to work with you to make the case for radical changes, so that you have the powers that can match the ambition of your London Plan.

All the best

Richard

User: Mr Max Millington

Housing targets

The Borough of Richmond’s housing target hitherto has I understand been 311 housing units per annum. An increase to 811 units per annum is unrealistic and can not be achieved without disproportionate detriment to our environment, infrastructure and heritage. This area is predominantly rural and sub-urban in setting, such an increase will risk destroying the Borough's rural assets such as open spaces which the Mayor otherwise states he wishes to see protected.

Density linked to radius from public transport / Stag Brewery SW14

In Mortlake and East Sheen we have close to 900 housing units proposed on the Stag Brewery site but the accessibility of this site is extremely poor - to the extent the 900 units proposed is grossly excessive. An ambitious SPD for the site exists, and that was founded on a maximum of 560 units on the site - and that was before the Council sought to impose a 1,200 pupil secondary school on the community on the same site! The site and envions will simply not function with this scale of development. If housing truly is the immediate priority on this site, the school must be made smaller and the playing fields be protected.

The Brewery site, whilst within 800m of Mortlake Station and East Sheen town centre, nevertheless has a PTAL 2 rating (varying between 1 and 3) and can only be accessed from Lower Richmond Road/Mortlake High Street which are already grid-locked for most of the day due to constraints at Chalkers Corner to the west, the Sheen Lane level crossing by Mortlake Station to the south and the River Thames to the north. The public transport improvements proposed for this project are almost non-existent.

Thus, the 800m citerion is arbitrary: in the same way that maps at stations showing a 5 minute walk in each direction can provide a useful indication of travel time, when there are material obstacles that will impede that walk - such as a major road, an inaccessible site, physical impediments, or a river - the value declines materially. Accordingly, an arbitrary 800m rule will not deliver a sensible outcome. I would recommend it be dropped, or in the alternative that it be heavily caveated to take due account of the particular circumstances the site in question, which must prevail. Due account should also be taken of the capacity of public transport to expand with increase in population: where that is minimal, such as at Mortlake station where trainlines are operating at capacity, the housing capacity in the years to come wil necessarily be lower.

The Borough of Richmond’s target of 634 housing units on small sites (below 0.25 ha) is unrealistic and can not be achieved without detriment to our environment, infrastructure and heritage.

In Mortlake and East Sheen there are, I understand, very few small sites within 800m of Mortlake Station or the East Sheen town centre. Estimate is in the region of 10 new units per annum.

Affordable housing

Until now development of major sites in the Borough of Richmond has included about 20-25% affordable. 50% is unrealistic in practice as it will deter developers from coming forward with development proposals and hence housing targets will never be achieved. A 35% target with 30% being achieved seems sensible and achievable. It is imperative that numbers are universally reported and viability reports are made publically available.

There does not appear to be any policy regarding vacant housing units. There are some 15,000 recently built housing units lying vacant.

User: Mrs Valerie Robertson

Care must be taken to ensure that sufficient new schools, medical services, etc. are provided in advance of any increase in population and such increases in population should not be imposed unless adequate increases have been made to the infrastructure necessary to support them.

The increase in public services should not encroach on open land which is used for recreation purposes, i.e. parks and sports grounds.

User: Eastcote and East Ruislip Branch of the Ruislip-Northwood Conservative Association

In respect of Chapter 4, we see a clear threat to the identity and character of our local neighbourhoods, identities and characters which currently enhance the quality of life and well-being of our residents. The outer London suburbs have a character and desirable qualities which could in time be lost under the draft Plan.These threats are clearly identified in the London Borough of Hillingdon response, of which two paragraphs are quoted below:

35. The Plan has neither appraised nor understood the 'suburban pattern of development' in London, for its intensification policy would have far reaching and very damaging consequences for outer London boroughs. This is particularly true of Hillingdon, which is one of the least developed. Hillingdon comprises a number of former mediaeval and post mediaeval villages and small towns which grew up along the roads leading out of London: Each has its own historic character and the sense of place and identity which their residents experience is very strong. Moreover, each historic core has been designated a Conservation Area, with other Conservation Areas capturing the quality of their Victorian, or interwar, residential or canalside industrial suburbs.

36. There is already pressure to 'extend to convert', redevelop or infill in the back gardens of larger houses and this has often led to compromised designs, a loss of well detailed Victorian and 1920's houses and a creeping reduction in, or loss of, gardens with their amenity, biodiversity and flood mitigation value, an increase in hard standings, and a relentless incremental erosion of the cherished streetscene. With a strong presumption in favour of intensifying development of this type, within 800m of underground stations or town centres, in this ad hoc, incremental way, the pressures would be greatly increased and large swathes of the Borough would be hugely compromised in their character and amenity, with their history illegible to visitors and their green settings lost.

37. There is no clear protection for Conservation Areas or local heritage designations in these policies, nor for the settings of listed buildings, which should be taken into account when considering proposals for new development. 'Underused sites' could be interpreted as large family houses with gardens whilst 'unacceptable levels of harm to designated assets' would be difficult to determine and even more difficult to agree. There are at least 17 Conservation Areas and numerous Areas of Special Local Character in this Borough which would be directly affected by the Policy to target sites within a set radius of the Borough's seven town centres and fifteen stations. A catch all GLA Design Guide could never provide the subtlety necessary for preserving the character of the many towns and villages which make up Outer London, whilst the specialist resource required by each Borough to write individual design codes for all of these areas would be unrealistic and the task unattainable.

User: Rob Robb

Please can I kindly ask that you take a few moments to listen to this article on the BBC Radio 4 Program on Saturday 2nd December 2017.

I think it shows our Mayor Sadiq Khan and his deputy Mayor James Murray are the ones that have really lost “The Plot”.

It appears you can plant a new tree in your front garden and it then gives you the right to build a three bedroom house in your back garden. With all these extra trees we will have to rename our representative on the London Assembly Member Tony Arboretum ? .

This is the last straw and along with his development Plan for London it shows he is an Inner London Mayor and very dangerous for us on the outskirts.

BBC Radio 4 Today Program 2nd December 2017

http://www.bbc.co.uk/programmes/b09gz3gg

Set the time line to **50:18 mins**

Unfortunately people think more of their free bus pass than the dangers of being under the control of this Mayor. We either need to get a Mayor that really understands the outer London Boroughs or we go for Brexit into Surrey before it is too late.

What about all the wildlife back gardens support and the relief you get from being in your back garden able to forget for a minute we have a Mayor wanting to destroy our society and communities.

The government is investing £300M more to fight the rising incidence of Mental Health problems in our Youth and even more sadly our children of all ages.

We do not seem to consider the causation of this rising problem and yes some of it is the time they spend on the internet etc. rather than being outdoors but to not learn from history and the 1960’s to force families back into the into High Density, High Rise, Rabbit Hutches is not going to help matters; the only outdoor space, if they are lucky, is a balcony 30 storeys up.

Can I kindly ask that James Murray pilots this scheme in Furzedown in Tooting first, to see how the nuts and bolts of his scheme will work and the affects it will have on the existing Residents, Communities and Wildlife.

User: Ms Nita Kamdar

I would really like to understand why the Government and Mayor insist on building blocks of apartments throughout already congested areas like Harrow. There is a lot more land in zones 6 and beyond, areas like Amersham, Moor Park, Beaconsfield, all of which are commutable to London for work purposes. Why not build properties there? Why congest Harrow which is already sooo congested, and full of 100s of immigrants with increased violence on our streets. It really is impacting the quality of our lives. I cannot emphasise how depressing it is especially when I compare Harrow to the above areas I've just mentioned.

User: Linda Bailey

Density ranges for housing have been removed this will lead more intense developments on small plots with little parking. Zero parking will be sought on developments,

Restrictions on building on underused industrial areas Bexley has identified some of the areas for new housing in their Growth Strategy.

The removal of the ban on back land development which will see residential packed tight and with a presumption in favour of small housing developments (up to 25 units) this will end up with the loss of green space which resident’s value highly.

User: Mr Nick Tennant

The comments below are submitted by the Riddlesdown Residents' Association (RRA), which represents approximately 1,400 households in the southern area of the London Borough of Croydon.

The RRA welcome the new London Plan's thresholds for affordable housing. We recognise the acute housing needs in our area, and wish to see more new homes that are genuinely affordable, provided for local people. We support new development that has a positive impact on the area's urban environment, public realm and provides social and economic benefits to the wider community. The RRA not not opposed to new development in our area as we understand that growth will be key to the future vitality and viability of the suburban District Centres in Croydon.

However, we wish to object to the new housing targets for Croydon proposed in the London Plan on the basis that this level of delivery is neither desirable nor achievable. As way of context, the current Croydon Local Plan (CLP) sets out an annualised rate of 1010 additional housing units, which is likely to be increased to an annual requirement of 1593 additional units in the soon to be adopted review of the CLP. This represents a significant (48%) increase in delivery, much of which will need to be provided in suburban areas like Riddlesdown.

The proposed London Plan annualised housing target of 2949 for Croydon is a staggering 192% increase on the current annualised requirement in the CLP. Whilst we understand that the GLA have assessed the demand (SHMA) and supply side (SHLAA) considerations of future housing provision, we cannot see any evidence that the plan considers the desirability of this level of provision from a sustainability perspective. Specifically, we cannot see any evidence that the physical, environmental and social capacity or capability of areas like Croydon to accommodate this level of housing provision has been explicitly considered in the development of these targets. Our concern is that these new annualised housing targets could have significant detrimental impacts in terms of air pollution, the transitional to low carbon, the existing streetscape and open spaces.

Linked to the above, we believe that it is critical that any new housing in areas like Croydon is supported by the necessary environmental, social and physical infrastructure. The new London Plan fails to set out a credible approach to infrastructure delivery. Rather, it identifies a significant potential funding shortfall and then discusses in qualitative terms possible options to address the shortfall.

London has never been required, or come close to, delivering the level of housing proposed by the new London Plan before. We are extremely concerned that such a radical intensification of areas like Croydon, particularly its suburban areas, needs to be underpinned by a robust, credible strategy for delivering the infrastructure required to support this level of growth. In addition, the new London Plan must set out clearly how Borough's should pro-actively work with infrastructure providers to ensure that the necessary infrastructure is provided before, or at the very least, parallel to housing delivery.

User:	The Access Association
No mention of dog spending areas for assistance dogs in this section of D5. This is very important for people with assistance dogs. No mention of distance from drop off point to communal entrance, which again is important for many disabled people.	

User: Brentwood Borough Council

1. The Greater London Housing Need Assessment identifies a housing requirement of 66,000 new dwellings per annum for over the plan period (2019-2041) spread across the 32 London Boroughs. According to the Land Availability Assessment 65,000 new dwellings per annum can be met. This leaves 1,000 dwellings per annum (or 21,000 new dwellings over the 20-year plan period) which will need to be provided outside the Greater London's administrative boundaries. Brentwood welcomes the commitment made in the London Plan to meet ambitious housing targets, however clarification is needed as to how the London Plan will address the 1,000 dwelling per annum that cannot be accommodated within Greater London. The Council raises concerns about the ability of the London Plan to meet identified housing targets considering how the pervious London Plan has failed to meet its housing targets. Therefore, clarification is sought as to how housing targets will be managed and the procedure(s) for triggering a review.

User: London Assembly Green Party Group

The housing policies in the draft Plan are dominated by the increased need for new homes, particularly affordable homes, identified in the 2017 Strategic Housing Market Assessment (SHMA). These massive new targets should be more clearly phased in these policies and prioritised towards town centre sites first, in order to avoid sprawl and fit better with policy SD8.

I am concerned that the policies that ask for the provision of homes of different tenures, do not ensure the needs identified in the SHMA will be met, and that the policies defining what will qualify as ‘affordable’ still contain loopholes that could lead to large amounts of ‘affordable’ housing being provided at up to 80 per cent of market rates.

In this response, I am also asking for an increase in the threshold of 35 per cent affordable housing for developers to qualify for the new Fast Track planning route. And I ask the Mayor to take responsibility for monitoring overcrowding and make these policies more prescriptive about the size mix of homes needed in different boroughs to ease this.

In addition, I believe that new small sites policies need to mandate more community involvement and that policies to avoid demolition must be made stronger.

User: London Ambulance Service

As highlighted by the London Plan the cost of living in London is high and can be a restriction when recruiting and retaining staff. We are keen to support any recommendations that would improve things for our staff, particularly for our frontline staff who play a key role in our service and our ability to provide care across London. It could also help us in recruiting and retaining staff, where the cost of living in London can be a challenge for staff, particularly as shift work makes travelling long distances challenging.

We are also in direct competition with other London trusts and bordering ambulance trusts to fill nursing and paramedic vacancies. We are also in direct competition for emergency operations staff to take 999 calls and dispatch ambulance with other emergency services in London, who are able to pay more. We cannot pay our call handlers more than the NHS pay scale allows.

In the London Chamber of Commerce and Industry report *Living on the Edge: Housing London's Blue Light Emergency Services* there were a number of recommendations for supporting frontline staff in London's emergency services to live in London. This recognised the importance of having staff within London for resilience, as well as reducing the risk to staff who may have long distances to travel at the end of a long shift. Where the Mayor has previously made comments on improving the affordability of homes for NHS and emergency service workers we would welcome further commitment to this within the London plan and how the Mayor's ambition to use NHS land for homes for NHS workers will be realised.

User: Arcadis LLP

We fully endorse the aspirations set out for housing in the draft London Plan. We do however have significant concerns that the detail and control that the plan then goes on to describe will not increase delivery, but if anything is likely to blight development and therefore reduce the delivery of new homes across London. The plan is trying to set a new vision that is reliant upon a wholescale re-evaluation of land value and development. If this wholescale change is to be achieved there can be only one outcome and that is a lost cycle of development. There are many opportunities to promote the increased development of new homes and the plan has in many instances been successful in identifying the opportunities, however, it falls short of promoting these opportunities through adding layers of complexity and control.

The aspiration to deliver more new homes across London than at any time since the 1930's without considering a review of the Green Belt will be simply unachievable.

If the mayor is to succeed in increasing delivery of all tenures by number, much of the complexity needs to be removed. Decide on the overall aspiration and let the market and the boroughs work out how best to achieve the goals.

User: Mr Bruce Cowan

So far as I am aware (I will admit to not reading the whole of this extremely lengthy document – I do have a life!) one of the key reasons London has a shortage of affordable housing has not been addressed in this plan. There really is no point in building new homes (the supply side of the equation) unless you also address the demand side. It may require central government legislation to achieve this, but I would like to see a complete ban on second home ownership in London, a ban on home ownership by people who are not ordinarily resident in the UK and restricting the sale of homes to people who have already lived in London for, say, at least three years. I believe this has been tried in parts of Cornwall where the scourge of holiday homes has driven property prices beyond the reach of locals.

When I was young I was able to get on the property ladder in London even as a single person on a very average wage because buy-to-let was not yet fashionable and foreigners had yet to see investment in residential property here as a one-way bet for making money. Taking those two elements out of the housing market would no doubt depress prices, but it would at least give the current generation of young people the same opportunity of buying their own home that I had when I was their age.

User: Fuel Poverty Action

On policies H1, H5, and H7

1. **Pressure to quickly increase housing supply must not lead to a generation of inappropriately sized and priced, and badly designed and built homes springing up all over London.**

1. **We do not accept a definition of “affordable” that includes homes out of reach of the majority of Londoners. Rent and mortgage levels severely impact residents’ ability to heat their homes. Heating systems and energy efficiency severely impact residents’ ability to pay their rent and mortgage. A home is not affordable if you cannot afford to heat it.**

1. **The result of building for the higher end of the market will be more households trapped in poverty, or forced into poverty, including fuel poverty, and including homelessness.**

1.

Existing policies are leading to more homes being built to stand empty. Instead, the Mayor should ensure that the many homes already available in London, but empty, often for years, are occupied.

1. **It is essential to define, monitor and, critically, enforce standards for new and existing housing. Existing policies on this are not effective, and we have seen new build homes in London that do not meet HHSRS standards on cold, damp and mould, or safety. The mayor must ensure:**

1. **Effective mechanisms and commitment to listen to local residents and act on what they say both before any refurbishment or regeneration, and after completion.**
2. **Developers and contractors should not be awarded funding, planning permission or contracts while major problems remain in homes they have already built. The outstanding problems must be resolved first, for the benefit of both existing and future residents.**
3. **Reparations for inadequate performance and unfulfilled contract obligations should go not only to a local authority but to the residents directly affected.**
4. **The GLA should press for the de-privatisation of the British Research Establishment (BRE), for testing and inspection regimes that are fit for purpose, and for building regulations free from loopholes and representing the interests of residents, rather than developers or, for example, the plastics industry.**

User: Ms Amber Fahey

Policy H1 Increasing housing supply

1. We feel that the overall housing target, derived from the Strategic Housing Land Availability Assessment (SHLAA) can only be achieved through - over-delivery of one and two-bedroom homes, failure to address high levels of overcrowding prevalent in some of the most deprived communities of London and failure to deliver mixed and balanced communities and lifetime neighbourhoods.

2. We don't feel that this can be defined as 'good' or sustainable growth particularly where there are huge questions around financing for essential social infrastructure and homes that households with below median income levels can afford.

3. Having a single target for all types of homes needed in London gives the impression that delivery of homes, regardless of type and tenures is essential and is meeting need while often is it only meeting need at the top end.

4. Successive London Mayors have argued that delivering of more market homes (than evidence suggests is required) is the best way to bring down house prices. However, an increasing range of media commentators say that building more homes (regardless of type) will not deal with the housing crisis and won't bring down house prices.

   The Kate Barker national review of housing supply of 2004 recognised this, saying that even if private housebuilding roughly doubled from 120,000 to 240,000, house prices would still continue to rise on a trend of 1.1 per cent above inflation. The review said that to stop house prices rising at all would imply a level of market housebuilding that would be "undesirable and unachievable"[1].

1. The evidence of need for social-rented homes in London is enormous. The SHMA identifies this at 47%, but taking 25 years to meet the backlog of need. If the very high levels of backlog of need for social rented homes (at 163,000) was to be met over a 10-year period this would require 62% or more of homes delivered to be social rented.

2. We proposed that policy H1:

- title be changed to '**increasing supply of the range of homes needed in London**';
- should provide targets for the different tenures of homes required over a 10-year period setting out need as identified in the SHMA (but with alterations we suggest in Policy H12) along with an overall total;
- require a cap on delivery of homes above targets, except in the case of social / low-cost rented homes, where there is such a high backlog of need.

Policy H2 Small sites

2.1 While some protection for exiting social-rented homes is provided in respect of larger scale estate regeneration and demolition (Policy H1o), we are worried that social housing estates will be targeted for small scale demolition and development through this policy, resulting in on going loss of precious social-rented homes, green and play spaces. Section B(1) is of concern in this respect.

1. We support the inclusion in Policy H2A(4) – providing support for custom, self-build and community-led housing, but feel that the policy should be strengthened.
2. We propose the following:

- Policy H2 should more actively encourage custom, self-build and community-led housing – particularly where it meets social / low cost rented need;
- it should require boroughs to establish relationships / work closely with local custom, self-build and community-led housing organisations to delivery social / low cost rented homes; Leathermarket JMB being a good example of this;
- design codes should not be determined on clear measurable standards;
- the following text (in bold should be added to section F7 - **social housing estates, including** estate regeneration schemes**,** unless full consultation has been carried out and full agreement attained in line with the Mayor's good practice guide on estate regeneration.

[1] http://webarchive.nationalarchives.gov.uk/20120704150620/http://www.hm-treasury.gov.uk/d/barker_review_report_494.pdf

User:	David Bonnett Associates

Mobility scooters. DBA consider that mention to provision of mobility scooter parking should also be made under Housing policies (it has been removed from the current London Plan).

User: M S M

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As with the rest of this plan, the housing proposal is a disgrace. It is inadequate and not fit for purpose and will have a long-term damaging and catastrophic impact on the borough of Richmond upon Thames.

Instead of pursuing this short-sighted and immensely damaging plan, Mr Khan should focus on working with the democratically-elected Government to accommodate Londons' needs OUTSIDE of London, and let London expand. Today, as part of social and econonic mobility, people commute longer distances and times for jobs and careers. The mayor should thus be working with the surrrounding councils and counties to see how London can benefit from this and vice versa.

Specificially the following elements need urgent reviewing

1. In keeping with Mr Khan's haphazard and arrogant approach, he has arbitrarily distributed his housing target within London bu issuing unrealistic and unachievable targets.
2. The new housing targets, especially for small sites are unrealistic and means ~80% of the borough's target will come from unidentified sources which is incomparable and undeliverable compared to past trend data.
3. The plan makes naive assumptions the increased housing should focus on accommodation for single and/or couples (1-2 beds), without taking in to account the demographic profile of the borough and its need for family housing.
4. Everyone is very concerned about the huge impact on the borough resulting from the increased housing target, as the plan shows no strategy for dealing with the social strain on the local infrastructure, economy and transport.
5. 55% of Richmond is designated Greenbelt and/or MOL - the plan needs greater detail and thought to address the concerns about the pressure to release smaller/non strategic land.
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User:	Putney Society

CHAPTER 7: HERITAGE AND CULTURE
We welcome the recognition of the importance of Heritage with both a chapter and also references elsewhere notably in chapter 3 Design and to some extent **Chapter 4 Housing.** This reflects the consensus that economic, social, environmental and cultural benefits derive from historic assets and surroundings.
We support the principle of this chapter to ‘inform the effective integration of London’s heritage in regenerative change’.

User: Kew Society

Chapter 4 Housing

Policy H1 Increasing housing supply

Para 4.1.2 treats London as a single housing market area with complex interlinked submarkets. As the Mayor did not consult with the Boroughs on the small sites policy, we question whether the nature of the submarkets has been adequately considered.

Policy H2 Small sites

The target for Richmond of 811 new housing units each year for 10 years with 634 of these to be on small sites is very challenging. Full dialogue with Boroughs on deliverability should be undertaken. In particular, the small sites policy and its methodology have been developed without reference to the Boroughs, who know their own areas best. This is a major departure from previous sensible practice and runs the risk of being undeliverable. It is the change in methodology that has led to the huge increase in the targets for Boroughs to meet on small sites. Such a fundamental change must be considered with the input of the Boroughs on whom the onus to implement the change is placed. Previous practice has been to consult with the Boroughs on large sites and Richmond Council has already stated that it could meet housing targets on such sites while it will have great difficulty in meeting targets on small sites. The new policy focusing on small sites and on the outer Boroughs risks being undeliverable and needs full local engagement so that practical ways of achieving “good growth” can be identified taking account of the character of the local area.

Small site development will lead to loss of green and open space, even if it is private. Provision of green roofs does not compensate for the amenity lost by loss of the space, although it may mitigate poor air quality. Full consideration needs to be given to loss of amenity space in weighing up planning applications.

We have commented on the emphasis on 1 and 2 bedroom flats in town centres etc. elsewhere.

Council land and other public sector owned land should not be considered just for housing – social infrastructure needs should be considered first to ensure there is not a proliferation of housing growth without the supporting infrastructure. This is particularly important in areas such as Kew where land and property prices are high. It has led, for example, to the commercial purchase by the Education Funding Agency of a property for conversion to a school in a totally inappropriate location on a busy road with insufficient outdoor play space. Fortunately the proposal did not proceed, but it is an example of how social infrastructure is taking second place in competition with commercial development.

Policy H2D prescribes that the Boroughs are to apply a presumption in favour of 1-25 unit schemes in the areas within 800 metres of a Tube or train station or the edge of the town centre boundary. The implications for a “green” area like Kew and much of Richmond Borough are potentially very adverse. This is even more so when *paragraph 4.2.5* states that the characters of some neighbourhoods will have to change to meet incremental intensification of existing residential areas within PTALs 3-6 and within the 800 metres distance. More flexibility should be given for Boroughs to determine the most appropriate locations for achieving targets.

Paragraph 4.2.7 on Conservation Areas: While the Plan mentions the need to ensure that increased housing provision is accommodated in such a way that it also “complements and enhances” a Conservation Area, the wording echoes but distorts and dilutes the wording in planning law that the character of Conservation Areas should be “preserved and enhanced” (which does not mean preserved in aspic).

Paragraph 4.2.8 states that small schemes (because they will be in close proximity to existing homes) need careful and creative design to avoid an “unacceptable level of harm” to the privacy of the surrounding properties. “Unacceptable” is open to wide interpretation and where conflicting needs (housing versus amenity of residents) occur, then it seems the small sites presumption may take priority. This should be amended to ensure the amenity of residents is given due weight.

Paragraph 4.2.9 acknowledges that green, open space will be lost and so proposes green roofs to mitigate loss of biodiversity or green space. This will only partly mitigate as a green roof is not accessible to humans whereas green open space is, even if only visually.

Policy H5 Delivering affordable housing

As above, we agree that affordable housing should be provided on site (paragraph 4.5.5 of the plan), with cash in lieu the exception. Viability assessments where required should be published for public view and comment.

Policy H11 Ensuring the best use of stock

We support efforts to ensure that housing stock is occupied.

User:	Royal Town Planning Insitute

Elsewhere in the response we have raised issues with the Draft Plan's intensification strategy. There are particular concerns that such a strategy could lead to issues such as hyper-density. As we state in our policy paper ‘Where we should build more housing’15, our members do not generally believe that development within existing built up areas will not meet all our needs for housing and other development. Green Belt designation should be just one consideration when making decisions about sustainable locations for development.

User: PCS Trade Union

As mentioned in the introduction the cost of housing is a key issue for PCS members. With many on low wages (see also Heritage and Culture section below) the lack of real affordable housing to either rent or buy is a serious issue.

According to the London Trust4 rents in Inner London in 2015/16 were 72% of earnings compared to 29% for the rest of England. But rents have increased across the whole of London whether in the private or social rent sectors. This is set against a stagnation in wages for PCS members as highlighted in the introduction and under the Heritage and Culture section below.

The strategic aim in the Plan to deliver 50% affordable housing (H5) is welcome but we question how this will be delivered when reliant largely on private property developers, and property speculation. It is also concerning that as the 50% target is an overall target for London that it may enable an even greater “ghetto effect” to develop where lower income workers are pushed to the outer edges of the Capital or within Boroughs to give over prime land to more lucrative property developments. Affordable homes for key workers – meaning nurses, teachers, emergency services workers, civil servants, and others critical to keeping London’s public services and economy, such as in tourism or cleaners, running – in both inner and outer London boroughs has to be the bottom line for the Plan. Not private property developer’s profits.

User:	Gatwick Diamond Group of Authorities

It is noted that, to a greater extent than previously, the draft London Plan recognises that London's housing needs should and will be provided for within the administrative London area and not be displaced. This includes recognition that affordable housing priorities are essential. This is welcomed as being of significant importance to the proper planning and sustainable growth and prosperity in the Gatwick Diamond area.

The Gatwick Diamond Authorities recognise that planned housing growth does offer advantages to the area. The Diamond Area has experienced substantial housing growth, with some linked to the displacement of London-based housing need. Some of this is unplanned, operating through planning appeals and delivering housing, some of which is not in sustainable locations. This adds to environmental stress, increased car dependency and environmental pollution.

Additional housing creates stress upon existing infrastructure and undermines environmental policies and the metropolitan green belt. This is prejudicial to and operates against efforts to promote the economic and employment growth of the area. At the same time, very high increases in house prices, partially due to the failure of London to provide sufficient housing for London's specific need including affordable housing has made housing affordability for a large section of the population in the Gatwick Diamond Area, including young people and key workers, an unattainable dream. This creates for the Gatwick Area community stress and mitigates against achieving high economic potential and prosperity.

User: Gatwick Diamond Group of Authorities

Gatwick Diamond authorities are aware that in local plan examinations, Planning inspectors have added additional numbers to local housing targets to provide for London's unmet need. There is insufficient certainty and robustness in what the draft London Plan proposes to be persuasive if the tests of soundness which apply outside London were applied to the draft London Plan. While the draft London Plan is not obliged to be tested to such a level of rigour, the London Boroughs' Local Plans which will continue to have a role are not able to escape this requirement.

In contrast to the seeming consensual approach with authorities outside of London, the draft London Plan is far more prescriptive with the approach to densification and housing target numbers for London Boroughs, particularly outer London Boroughs. The proportion of the identified housing need between inner/outer London has altered significantly in the draft London Plan and the level of involvement in what previously was considered to be matters to be dealt with at an individual Borough basis has greatly increased. This involvement has even been increased to the extent that GLA officers have suggested that the need for statutory Local Plans in the boroughs could be regarded as optional. There is, it is said, enough in policy terms in the draft London Plan to encourage sufficient densification to meet the housing target through development management in the Outer London Boroughs without an up to date Local Plan.

The Gatwick Diamond authorities would identify their concerns as:

1. That substantial higher housing numbers in the outer London boroughs will exacerbate commuting because patterns of movement over the London boundary are complex and two way.

2. That there is potential for better meeting a significant proportion of London housing needs by continuing the focus and level of housing growth in inner London.

3. That densification of the suburbs and the new mechanisms suggested by the draft London Plan are relatively untested and unproven. Together with a restrictive Green Belt policy, this could lead to under-provision of housing numbers against the housing requirements, and under-provision of family housing against needs, pushing unmet demand beyond the Greater London boundaries.

4. That under-providing against the identified housing need over the ten years to 2028/29 will add up to the size of a small town (10,000 dwellings), even if housing targets are met and there is no strategy to deal with this.

5. The Gatwick Diamond authorities are able to exercise the duty to cooperate and other liaison processes with the outer London boroughs in the south of London through the opportunity to discuss and engage in the process of the making of those local plans. This process will be subverted by the draft London Plan.

6. That unqualified support for Gatwick Airport expansion without requiring the same need to ensure it would not result in “additional environmental harm” as it does for Heathrow (para 10.8.7 of the draft London Plan) is a serious omission.

7. The concept of willing partners working together, such as between the GLA and other authorities beyond the London boundary, is supported. This approach should also apply to within London and the relationships between the GLA and the outer London Boroughs, otherwise there is a risk that disruption and a breakdown of working relationship will jeopardise the provision of sufficient housing within London as a whole to meet London’s needs.

8. There is a substantial risk of non-delivery of the draft London Plan housing need targets. The Gatwick Diamond authorities support the need for a monitoring framework and risk management plan, which other Local Authority Groupings, such as SEEC, are also highlighting.

User: UCL Urban Laboratory

Identity-responsive housing provision and services for LGBTQI+ people in London

There are a number of housing related issues covered by the London Plan that are particularly salient to LGBTQI+ Londoners (H4, H5, H14, H15), who for a range of reasons linked to historic and on-going social oppression and discrimination, find themselves to be at a high risk of being precariously housed, homeless and often lacking the social and familial networks that meet support needs.

The higher than average socio-economic vulnerabilities and related precarious circumstances concerning housing and homelessness faced by members of London's LGBTQI+ communities commonly relate to discrimination driven by prejudice towards sexual and gender minorities whose identities and experiences challenge social norms. For instance, research by Stonewall (2018a) shows that 25% of trans people have experienced homelessness.

It is vital to recognise that LGBTQI+ people are also members of other vulnerable groups. For example LGBTQI+ older people who often feel forced back 'in the closet' in older age, LGBTQI+ young people who face higher than average instances of homelessness and LGBTQI+ people of colour who face intersecting forms of discrimination. Thus, an identity-responsive approach to housing needs, attentive to these intersecting characteristics, must be facilitated through specification in the London Plan.

Examples of identity-responsive service provision for members of the LGBTQI+ community with housing and related social needs include the Outside Project, Opening Doors London, Stonewall Housing, the Albert Kennedy Trust and For Viva (Manchester).

In addition to supporting the new services addressing the housing needs of LGBTQI+ Londoners, the GLA must support existing community infrastructure and networks that are well placed to understand and address LGBTQI+ community needs.

LGBTQI+ communities as an ‘at risk’ group

LGBTQI+ communities should be specifically referenced as constituting an ‘at risk’ group with higher than average vulnerability to homelessness and specific needs regarding the housing service and provision in H5, H14, H15 and H18.

Evidence supporting this is well documented in research (see reference list), which suggests that despite gains in terms of rights for LGBTQI+ people, there is reason for growing concern regarding prejudice, poverty, safety and homelessness.

For example, it is common that LGBTQI+ people experience identity-related challenges to finding secure employment, have lower than average incomes and experience workplace discrimination, contributing towards higher than average risk of eviction and homelessness (Giray Aksoy et al. 2017; Stonewall 2018a; 2013; Bachmann and Gooch 2017). London, and the UK have seen an increase in the reporting of hate crimes against LGBTQI+ people (Stonewall 2017; Mayor of London 2017), who also commonly experience violence and abuse within domestic settings by partners and family members (AKT 2015; Browne 2007; Bachmann and Gooch 2017; Stonewall 2018b).

As per policy H4, the London Plan should require London b oroughs to facilitate the provision of meanwhile spaces, temporary buildings, property guardianships and empty buildings to provide space for identity-responsive services to address housing needs for LGBTQI+ communities.

In addition to reflecting the evidence of specific vulnerabilities of LGBTQI+ communities in the London Plan's policies on Housing, Good Growth, Social Infrastructure and Heritage and Culture, further preventative measures by the GLA would prove instrumental in addressing existing and intensifying housing and related socio-economic needs within LGBTQI+ communities. For example, establishing and financially supporting the provision of LGBTQI+ sanctuary spaces and supported housing for LGBTQI+ people facing difficult circumstances (see For Viva housing scheme for LGBT people in Salford); supporting the establishment of a LGBTQI+ community centre that hosts organisations providing identity-responsive housing services and advice.

User: London Assembly Conservative Group

Housing density

The removal of the housing density matrix means there are now no guidelines on density limits for new developments, to ensure that they are appropriate for the location and PTAL (public transport accessibility level) of the development. This has been replaced by much more vague guidance around aspects such as design, which leaves this wide open to interpretation by developers. **The density matrix should therefore be reinstated to ensure that new developments can be set at an appropriate level for their context and surroundings.**

We also note that the new housing target of 64,935 homes per year has led to dramatic increases in borough housing targets, which appear to have been set without borough involvement. Whilst we strongly support policies that meet London's genuine housing need, we are concerned that the methodology of the Strategic Housing Market Assessment (SHMA), in overestimating need for one-bedroom homes compared to larger family homes, may have over-inflated the number of new homes needed in each borough. **This should therefore be re-examined to ensure that appropriate targets are being set for each borough, reflecting the number and type of new homes that are truly needed and the capacity for delivering these new homes.**

User: Eastcote Conservation Panel

Chapter 4. Housing

The Mayor advocates the increasing use of small sites for development.

Policy H2. Small sites.

D1. Infill development on vacant or under used sites.

D2 (d) Infill within the curtilage of a house.

The NPPF does not allow the building of dwellings in gardens.

Although this plan does not specifically use the word ‘Gardens’ the policy H2, D1 & D2(d) means exactly that, building in gardens. ‘Garden Grab’

We are not aware that the Mayor has greater powers than the Secretary of State and is able to change Government policy. Therefore, this policy must be removed from the Plan as it does not conform with the NPPF. As mentioned earlier this is not planning for good growth. It is a license for a free for all, a developers dream.

The loss of biodiversity by building on land that was once a garden cannot be replaced by the proposal of having green roofs/walls and extra street trees. Green roofs are expensive to

install and costly to maintain. Green walls are even more difficult to maintain and will use a considerable amount of water, which will be a waste of a precious commodity.

LBH has made it very clear in their submission that Hillingdon Borough is not served by a very good public transport system. Not everyone works in the centre of London, owning and using a car in most areas of the borough is the only way to travel to work, visit a hospital etc. The restrictions on parking spaces per dwelling in this plan do not take into consideration the

varying needs of the different London Boroughs. This should be reconsidered and left to each borough to set it’s own standards according to need.

The excessive increase in the number of dwellings allocated to LBH is not possible. More than 15000 in 10 years is a threefold increase.

The Mayor, although against expansion at Heathrow has not taken into account the extra stress this would place on housing. Therefore, the draft plan should include a strong reason for refusal of the Heathrow expansion citing that the increase of population cannot be accommodated. Gatwick has far more scope for population increase than the current situation of the airport. The use of Gatwick should be stressed in the draft plan.

User: Eastcote Conservation Panel

Chapter 4. Housing

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User: London School of Economics

As noted above, the housing targets contained in the plan are predicated on the view that it is both possible and desirable to accommodate the vast majority of the capital's projected increase in population within the boundaries of the 33 boroughs (although in practice there would be no control

over where new households decided to live). The overall target for new homes, and the borough breakdowns, are based on the Strategic Housing Land Assessment, which demonstrates that in principle there is enough land capacity to accommodate these homes. However these numbers must then be delivered, which as discussed above is much more difficult to achieve. The numbers are not predictions, but the language of the plan does not make this sufficiently clear.

The plan must strike a balance between having high ambitions for housing production to try to encourage more housing starts, and not creating unrealistic expectations or building in certain failure. The targets contained in earlier plans, which were much lower than the current numbers, were achieved in terms of planning permissions but not in completions. However Table 4.1 of the draft plan is entitled '10-year targets for net housing completions'. Based on historic performance we believe it is extremely unlikely such completion targets will be achieved. We suggest the table be renamed '10-year targets for housing approvals' and the discussion make clear that the numbers reflect targets and capacity rather than predictions and outcomes.

We welcome the statement that the Mayor intends to intervene more actively in the land market although also note that powers here are quite limited. London's high land costs make it enormously challenging to build significant amounts of affordable housing on land acquired at market value. A meaningful increase in the proportion of new affordable housing—particularly at prices that are genuinely affordable to lower-income households—can only be achieved if developers can secure land at less than current market value. Here the Mayor can make a contribution by exercising his strategic powers to identify and assemble land in suitable locations, and by selling it on at a price that makes construction of affordable homes viable.

The discussion of affordable housing is inevitably compromised, as the Plan must perforce employ the terminology of central government policy; 'affordable rents' that are related to local market rents do little to address affordability in terms of average income. The discussion is further complicated by the GLA's introduction of novel terms and definitions.

Policy H7, 'Affordable housing tenure', attempts to ensure that at least 30% of affordable homes are accessible to low-income Londoners by charging a social rent, with a further 30% at intermediate prices. Tenure and prices of the final 40% are to be determined by individual boroughs. This seems like a suitable approach in general, but boroughs should be encouraged to seek as much genuinely low-cost housing as possible in the tranche over which they have discretion.

We welcome – cautiously—the threshold approach to planning permission, which is already being implemented. Under the threshold approach, planning applications for residential schemes with a minimum of 35% affordable housing (50% on public land) will be 'fast tracked' and will not have to undergo detailed viability assessment. The thinking is that greater certainty about affordable housing requirements will eventually be reflected in lower land values and speedier development. We understand that the 35% target represents something of a finger-in-the-air reckoning; we therefore suggest that the policy be kept under active review to understand the effects of this number on both delivery of market and affordable housing and land availability. We are also concerned by the continued inclusion of aspirational targets which reduce the level of certainty.

We are concerned that the 50% target for public land may reduce the amount of public land coming forward. Most public land is not owned or controlled by Mayoral bodies but by other institutions (eg the NHS, prison service, Ministry of Defence). Requiring 50% affordable housing will have the effect of reducing the value of plots. Public landowners are often legally required to secure ‘best value’ when selling capital assets, and the law does allow them to consider social benefits such as affordable housing when determining best value. However widespread pressure on public-sector finances gives many such organisations a strong incentive to maximise financial receipts from sales. Public landowners may well decide to hold their land off the market in the expectation that the 50% requirement will eventually be loosened. We recommend that the effects of the 50% requirement on public land be especially closely monitored, and that the Mayor work with major public landowners to develop innovative schemes for bringing forward affordable housing on their land.

We note that the introduction of these targets prioritises affordable housing over all other potential uses of land-value capture. If this reduces the contributions available for large-scale infrastructure projects it may mean they cannot be fully funded. In general there is considerable ‘double counting’ (or rather ‘double spending’) of the potential revenues from land-value capture.

We welcome the clear definition of Build to Rent development, which captures the essential elements. The plan is right to recognise 'differences between Build for Rent and Build for Sale', although the meaning of those words—that residual land values based on capitalised rental streams are lower than values based on sale receipts, and therefore provide less headroom for affordable housing—will undoubtedly be unclear to many. Confusingly, and importantly, the draft Plan itself does not seem to recognise the differences, as the 35% threshold for affordable housing applies equally to build to rent schemes. We think few if any build to rent schemes will be viable with 35% affordable housing, which means all such schemes will have to undergo time-consuming viability testing. This seems perverse since one of the strong arguments in their favour is that they can be built fast. We recommend a lower threshold be applied to Build to Rent schemes.

One topic which is not fully discussed in the draft Plan is the role of permitted development in increasing housing delivery outside the mainstream planning regime. While we recognise the significant contribution currently being made by PD to housing numbers, we are concerned that such development makes no contribution to even basic local social and physical infrastructure (and so requires cross subsidy from other revenue sources). It is unaffected by the Mayor’s housing standards, and leads to a loss of commercial capacity which may negatively impact on the good growth targets. We would welcome evidence that the Mayor is in discussion with national government to improve outcomes.

Finally, the requirement to fit more housing within the constraints of London’s existing boundaries means intensification is inevitable. We welcome the proposals to redevelop and intensify retail parks and large parking lots, particularly as ongoing changes in shopping habits challenge the viability of such facilities (cf the recent collapse of ToysRUs).

User: Sevenoaks District Council

Meeting London's Housing Needs

The Mayor has rightly recognised that the availability and affordability of housing is a persistent issue across the Greater London area. The London-wide Strategic Housing Market Assessment (SHMA) looks at the general housing need across the area, as well as providing details for further specialist accommodation, including student accommodation and housing for older persons housing in the overall need figure. The SHMA states that London has a housing need of 66,000 additional homes per year over the plan period (up to 2041). The London-wide Strategic Housing Land Availability Assessment (SHLAA) identifies that there is capacity to deliver 65,000 additional homes a year on a combination of large and small sites across the 32 London boroughs.

We support the Mayor's ambitions in trying to address London's housing needs within the London boundary. Any additional population flows into Sevenoaks District and the wider Kent County would put pressure on already stretched infrastructure provision and the increasing under-capacity of services, housing and SDC, like many other local authorities in the wider South East region, have accounted for the "London effect" within own population forecasts and housing need projections.

It is not helpful if there are differences in the methodology between the London SHMA and our SDC's own SHMA, considering that London falls short of meeting its housing need by 1,000 homes per year. While the shortfall is very small to meeting the housing need, there would still be a minimum shortfall of 20,000 homes across the course of the plan period and there is a question of how this could be met. Like many other South East local authorities with a border to London, there is already significant pressure on Sevenoaks District to meet as much of its housing need of 12,400 additional homes, especially with significant planning constraints (i.e. 93% Green Belt and 60% Area of Outstanding Natural Beauty).

Finally, the Government's recent consultation "Planning for the Right Homes in the Right Places" proposed a standardised methodology for calculating a local authority's housing need. This has resulted in a number of South East authorities seeing a significant increase ranging from 13% (Sevenoaks) to 128% (Medway). There is also a significant uplift in London Boroughs as well with Bromley seeing a proposed uplift of 123% and Greenwich seeing an uplift of almost 950% under the proposed methodology. We appreciate that the proposal of a standardised methodology is still in draft and will be as part of a revision to the National Planning Policy Framework (NPPF), there should be a recognition to potential national policy changes.

User:	London Assembly Planning Committee

The Assembly has already addressed some of the Plan’s content in the Housing Committee’s response to the Mayor’s Draft Housing Strategy, sent in January 2018. Some of the points from that response are reprised or built on below.
5.2 The Housing Committee would like to highlight strong concern over whether the right balance has been struck between London-wide strategic prescription and delegation to the boroughs. The Assembly supports empowering the boroughs to make local decisions where appropriate and where they are properly equipped to do so. However, the boroughs also need the Mayor’s support in setting pan-London standards, especially when resources are stretched. For example, the Mayor has chosen to establish a London-wide 35 per cent benchmark for affordable housing within market schemes, which has now been extended to different types of development, such as build to rent and student accommodation. The rationale for this is, in part, to bring consistency, and support the boroughs to resist pressure in their negotiations with developers. However, the Mayor has left for determination by the boroughs other areas of considerable strategic importance, such as the preferred tenures for affordable housing for a substantial proportion of new development and the size mix of schemes, where they will doubtless come under equally significant pressure.

User: Newham Union of Tenants

Additional Policy – Co-operative / community led housing.

We propose that the Mayor should

1. work with existing, newly formed or developing London-based co-operatives, TMOs and CLTs to assess their existing and future potential (including resources and capacity) to develop new social / low-cost rented homes;
2. with the boroughs, identify and set aside public land that might be available to them to deliver community led housing;
3. with the boroughs, develop a London-wide list / online map of potential small development sites to match co-operatives / community led housing organisations with available development sites (particularly public land) for homes that will remain in perpetuity at costs that can be afforded by households of below median income levels;
4. provide support social housing tenants who wish to manage or collectively own their own homes.

User:	London Borough of Ealing

Whilst we support the need for increasing housing supply, our main concern relates to whether or not the Mayor's ambitious targets can be actually delivered in practice. Even the Mayor acknowledges that "the level of growth we must plan for will require significant investment – both from businesses and the public sector – in transport, infrastructure and affordable housing" and that to deliver the fundamental changes we need in the long-term that: "the Government should step up and give more powers and investment in London" (Foreword, P.XVI). We are wholly sympathetic and supportive of these sentiments and would be more than willing to support the Mayor in his endeavors to achieve this aspiration.

User: Save Hackney Wick

We think Live Work Space should be part of the London Plan's policies on Housing and be acknowledged as contributing to the affordability of both housing and work space. Where affordable studios are provided in some areas, such as Hackney Wick Fish Island, it will still be necessary to find housing that is almost certainly far away from where studios are located.

The co-location of work and living space is a key aspect of the success of an area like Hackney Wick Fish Island, fostering social contact, efficiency, the sharing and protection of resources.

Good management is the key to successful live-work space, ensuring that the spaces are used as they should be.

User:	Bexley Labour Group
viii. The group agree with scrapping the scrapping the density matrix approach.	

User:	Canary Wharf Group

With regard to Table 4.1 – ’10 year targets for net housing completions (2019/20 –2028/29)’ we would like to clarify if these are minimum targets as in the current LondonPlan. Central Government’s September 2017 consultation – ‘Planning for the righthomes in the right places’ sets a figure of 4,873 dwellings per annum for Tower Hamletsas an ‘Indicative assessment of housing need (2016 – 2026)’ which is over 1,300dwellings per annum above the Draft London Plan target for Tower Hamlets. Thissuggests that the London Plan figure should be seen as a minimum in order to deliver a“step change” in housing supply.

User:	London Borough of Hounslow

For these reasons, we strongly support and will aim to meet the increased 10-year housing target as set out in Chapter 4, and welcome the two Opportunity Areas (Heathrow and Great West Corridor) adopted in Chapter 2, as part of the Elizabeth Line West Corridor, to deliver a total of 20,500 new homes and 25,000 new jobs and we look forward to working with yourself to bring these forward rapidly through Opportunity Area Planning Frameworks.

User: Hampstead CAAC

HOUSING

DLP calls for assessment for development of any site having ‘available’ land. Intensification & Optimisation are conside3red to increase sites’ use and densities defined ad hoc per site.

Brownfield sites are mentioned but are these considered separately from other small sites.

LBC not obliged to have own housing targets, but acknowledges DLP aims and aligns with own targets.

The DLP should allow for more feasible targets especially for Affordable Housing. Control for this should be robust and not susceptible to dilution by developers pushing for or councils accepting ‘provision elsewhere’. (David Milne)

Welcome offer of units to Londoners before marketing elsewhere. Requires Parliamentary action ?

User:	London Borough of Barking & Dagenham

We understand that housing has a social and community purpose and thus strongly support the housing policies. People need homes of many different kinds, sizes, designs and locations. A mix of different types of homes bonds us together; it builds communities and helps working people stay in the borough and families stay near each other. As such, the ambition to ensure Barking and Dagenham is a place with sufficient, accessible, and varied housing is a key theme within our borough manifesto.

User: Environment Agency

We note the Plan’s imperative to increase the rate of delivery of new homes. In some locations, there will be an increased risk that the Mayor’s policy objectives for the environment and for environmental infrastructure will be in tension with the boroughs’ implementation of the Plan’s new homes targets. For example, open space may be developed, or development restricted due to the site’s proximity to existing waste operations. Our comments on Chapters 1, 3 and 9 are also relevant to this chapter.

We will continue to work closely with the Mayor and others, to offer advice and data to minimise the environmental risks and to maximise the opportunities from the delivery of new homes. We highlight the intention of the Government’s 25 year Environment Plan for development to achieve ‘net environmental gain’. We believe it will be particularly challenging for the Plan’s policies to action environmental objectives on smaller development sites, and on sites where high intensification would result. Please refer to our comments to policy H2.

User: Save Swiss Cottage

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(iv) provide support social housing tenants who wish to manage or collectively own their own homes.

User: Member of Parliament for Chipping Barnet

Housing & Planning:
I am concerned about your proposals for housing and planning that would give Barnet the highest target for new homes of any outer London borough.

My view is that these changes could lead to over-development in the Chipping Barnet constituency. I accept the need for new homes and we are building more homes in Barnet than in any other London borough (primarily through large scale regeneration schemes). However, I believe it is vital to ensure that new development is in tune with the surrounding area and does not put undue strain on local services and infrastructure.

The draft London Plan proposes to remove the ‘housing density matrix’ which puts limits on how dense a development can be in a local area. This is likely to open the way for much larger scale, high-rise, high-density development in Barnet. I strongly oppose this aspect of the draft London Plan and would ask for it to be deleted from the final version.

Removal of the housing density matrix would have a negative impact on my constituents, including added pressure on roads and parking.

I am also disappointed to note that the target that 36% of affordable homes should be family sized is being removed. I believe that this will make it more difficult for young families to find a place to make their home in this area.

Current planning rules give some protection to back gardens to prevent too many of them from being built over. These protections would be removed under the new plan, giving more opportunities for so-called ‘garden grabbing’.

I hope that the plans to remove protection for back gardens will be reconsidered. I strongly oppose removal of protection for back gardens. They play an important role in quality of life and biodiversity in London. Allowing more ‘garden grabbing’ could create long term damage to our environment.

User: London Councils

Boroughs are keen to work with the GLA to meet increased housing targets. The policy in this section is significantly more radical than previous versions of the London Plan and it will be challenging for London as a whole to meet the new housing targets. The total target for London is now for 65,000 new homes a year, a large increase from the existing London Plan target of 42,388.

The justification for the new 65,000 home target is based on a detailed analysis of potential housing capacity in London through the Strategic Housing Land Availability Assessment (SHLAA). There is a focus on increasing housing delivery in outer boroughs where targets have risen on average 97% from those set out in the previous London Plan (compared with just an average 4% increase for inner London boroughs, whose housing targets have been traditionally higher in previous plans).

In total, 61% of the overall housing target is distributed in outer boroughs with 39% being in inner boroughs. Much of this increase is based on the potential capacity of small sites (38% of the overall housing target). For this target to be met the GLA and boroughs need to focus on ensuring that an adequate number of skilled construction workers are operating in London and that innovative models of delivery such as modular housing are embraced.

While boroughs welcome the ambition, they are concerned about the reality of meeting these targets, especially as lower previous targets haven’t been met. A fundamental shift in the construction market is required for this target to be met with small developers, boroughs and housing associations all contributing significantly higher levels of housebuilding than they are currently. In the best case scenario this alteration to construction target will take a number of years, and it will be difficult for many boroughs to meet new increased housing targets by 2020.

User: Old Bermondsey Village Neighbourhood Forum

Pressure to deliver housing targets is currently destroying the distinct character of places as well as existing communities and the functioning of the local economy.

As per our comments on Chapter 1 “Good Growth” and Chapter 2 “Spatial

Development Patterns” direction should be given here for councils to carefully assess the needs of existing residential communities and existing social and economic networks to frame their strategy. These assessments should be informed by meaningful local consultation and take into account emerging policies of Neighbourhood forums.

User: London Borough of Hillingdon

The Council strongly objects to the proposed housing target as set out in Chapter 4 of the draft plan. The Mayor has not provided any evidence to demonstrate that the proposed target can be delivered and the Council is concerned at the lack of engagement, particularly in relation to the approach on small sites, which was not communicated until a late stage in the process.

Fundamentally, the imposition of unachievable targets will encourage developers to bring forward proposals on sites that would not normally be granted planning consent and the significant erosion of the character of suburban areas. Experience tells us that a failure to demonstrate housing delivery results in the loss of planning appeals on Green Belt sites. These outcomes are completely unacceptable in Hillingdon.

User: Westminster City Council

It is increasingly simplistic to treat London as a single housing market. This overlooks the extent to which circumstances differ hugely within as well as between boroughs and the wider inter-regional context. To give two examples, parts of central London have super-prime housing that arguably forms part of a market on an international scale, while recent data about patterns of outmigration from Greater London shows how different groups are moving out of London to neighbouring districts. While this principle has been a central tenet of London planning since its inception there is a need to consider whether it remains true or helpful as the sole basis for policy-making. Its uncritical repetition risks distorting housing and planning policy, suggesting that the same approaches are likely to be effective in Westminster and in Barking and Dagenham despite the huge differences in housing needs, incomes and land markets.

Our experience shows there is a need, for example, for a distinctive approach to housing policy (particularly on affordable housing) in central London to ensure we can meet the whole range of housing needs to ensure vibrant and diverse communities and support the continued success of the local economy and public services. This is particularly challenging given the high cost of housing and land, and the pressure on developable space here. If we are to meet London's housing challenges it is essential that local planning and housing authorities are empowered to tailor approaches meeting local needs and circumstances – exactly what we are mandated to do in the National Planning Policy Framework.

The level of prescription shown in the DRLP and draft Housing Strategy is likely to impede boroughs' ability to deliver the housing all agree London needs, undermining the effectiveness of the DRLP itself. It will also undermine boroughs' ability to ensure mixed and sustainable communities with housing meeting a range of need.

As local planning and housing authorities, boroughs have duties under national legislation and guidance to identify and seek to meet local housing needs. The DRLP would undermine our ability to meet these. As such it oversteps the proper function of the Mayor's spatial development strategy and fails to have regard to consistency with national policies.

We have discussed our response with our registered provider partners active in Westminster and it is informed by their comments.

User: Ms Cate Tuitt

London's first **community land trust** provides permanently affordable homes at prices **linked** to local wages.

londonclt.org

This model I am pleased has been adopted by the mayors living rent scheme .

I believe that civil society should be acknowledged by the mayor , politicans and public sector Housing staff officers , who use these ideas and then put them into action and policy and the general public are not aware of the background to these forumulas.

No-one should have absolute control over land, only particular rights over use, and these should be controlled by the community through planning regulations. A clear framework is needed which puts a priority on the natural environment, encouraging sustainable use and discouraging unsustainable exploitation. The tax would be payable on annual value of land, not buildings, development or minerals. It would be levied locally and based on current permitted use, so if use is limited because of amenity or habitat value, then tax would be reduced.

Unearned benefits should be shared with the community and this can be done through Land Value Taxation, which should not be on top of other revenue raising measures but replace some of them.

Some of the many advantages of this system are: benefits for the majority, rather than a minority; offers incentives towards good stewardship; reduces corporate ownership; contributes to a decentralised, sustainable society; eliminates speculation and stabilises prices; more and cheaper land would become available, offering opportunities for community initiatives such as housing trusts, worker co-operatives, community supported agriculture schemes and other small scale enterprise.

Building new co?operative and community-led homes -

There is no legal framework for co-operative tenure – this should be high priority to resolve. Right of occupation should be able to stem from membership of a co-operative -

Principle for public land disposal - there should be a requirement to consider social outcomes beyond simply getting the highest bid at any cost

Community-led and co-operative housing should receive favourable tax treatment – housing associations already get this if they are registered as charities - There should be a clear understanding between co-operative and community-led housing – many projects include elements of both but not all - Communities should have the “Right to Designate” so that land is specified in planning frameworks as being for community-led or co-operative housing Tackling exploitative private rental markets

The private rented sector is growing – not because people choose to be private renters for the most part, but because there is a lack of social housing for the lowest income and a lack of affordable homes to buy meaning young people are priced out of homeownership. Issues include: - ½ of private rented homes are non-decent - Lack of proper oversight - HMOs are licensed but the scope is limited - Lack of knowledge of the sector in local authorities - 6-12 contracts are the norm creating significant insecurity -

The ease of eviction - Lack of affordability, and the difficulties in measuring this Rents are increasing – ½ of London’s private renters struggle to pay their rent and personal savings levels are decreasing - Within lower income private renters, the housing benefit cap is exacerbating the problem -

There is an imbalance of power between the tenant and the landlord There is no silver bullet and the solution should include increasing the supply, better enforcement and stronger regulation of the sector – as well as empowering communities through community-led housing. - Bring in mandatory licensing for all landlords, administered by local authorities but properly funded by central government.

There should be minimum standards set by a national private rented sector regulator so that all homes are expected to be at a minimum standard, and this should be checked regularly (annually or at least on every change in tenant) proactively, rather than relying on tenants to make a complaint. This would professionalise the sector, giving power back to tenants and providing a clear right to redress if homes are substandard. There would be better oversight and enforcement, and would enable future legislation or regulation of the sector. -

End section 21 no fault evictions and improve security of tenure through ending assured shorthold tenancies and bringing in a more secure alternative - Affordability and rent control – rents should be linked to local incomes and local authorities should have a key role in deciding what a fair local rent is.

Lessons should be drawn from the German system where tenancies are long term and rent increases are limited by consumer price index increases. -

End letting fees.- Give private renters the same right to redress as other consumers and support the creation of renters' unions. Private developers and land -

A land value tax should be brought in. This would also be a tool for regional growth - Rules on the green belt should be reviewed so that areas served by existing transport infrastructure have the rules relaxed to permit development - A "use it or lose it" approach to landbanking by developers should be developed which taxes land which has planning permission but isn't developed within a particular period Social housing – council and housing associations - Existing social housing, if part of a regeneration programme, should be replaced by equal or greater levels of social housing and a continued commitment to local lettings -

Right to Buy should end – and until it does, the government should ensure CLTs are exempt -

The Bedroom Tax should be abolished - The governance for Right to Manage should be strengthened to avoid the situation as in Kensington and Chelsea where the local authority failed to listen to Grenfell residents, and the right should be extended to residents of housing associations. All must have meaningful mandatory ballots. Including for sub-contracted work decisions for mayor work and health and safety should be regular audited after contracts have been procured.

Land Value Taxation

I propose the London mayor should lobby government to replace business rates and stamp duty with a land value tax, applicable to all land apart from property with an occupied primary residence on it.

Land in London should not be Land banked and the mayor should allow this. Spectulative planning applications should not be encouraged and the mayors Housing SPG should be amended to make that clear to developers.

Cable street site in east London and the Bishopsgate goodsyard site should be earmarked for community lead housing and the previous plans should be honoured for the bishopsgate goodsyard site.

Public land owned by the mayor, network rail and Tfl should be considered for community lead housing in forms of community land trusts and Co-operative Housing models.

The heritgate of conservation sites should not be allowed to be unlawfully breached by over development of commercial property developers, which put forward plans to block light and not provide adequate section 106, nor often the 50% affordable housing.

User: Maidstone Borough Council

The draft Plan's more restrictive approach to releasing employment land for alternative uses places significant limits on this potential source of housing supply. The Plan indicates that existing viable office floorspace capacity in outer and inner London locations should be retained and supported by article 4 directions to remove office-to-residential permitted development rights where appropriate. The change in approach would protect offices but parts of London have experienced loss of office to residential development from permitted development rights. Therefore the approach will also potentially worsen the capital's ability to provide homes (particularly lower cost homes) placing further emphasis on displacement to outer London and beyond.

The draft Plan also includes a general principle of no net loss of industrial floorspace in designated strategic industrial locations and locally significant industrial sites. The Plan adds that any release of industrial land for housing or other uses would have to be through a defined process, including co-locating industrial and residential uses on sites. Without the release of this land, the delivery of new residential development could be severely constrained and it is important that a balance is struck.

According to the NPPF, Local Plans should preferably have a 15 year time horizon and identify specific housing sites and locations sufficient for at least 10 years. With finalisation of the London Plan in 2019, this gives individual London boroughs little prospect of getting their Local Plans adopted in time to secure a 10 year time horizon for housing land supply ending at 2029 and thereby ensuring their own plans confirm with the NPPF. If an individual London borough wants to plan for a longer time horizon it will presumably have to estimate its own targets for the period post 2029, introducing uncertainty and additional areas of challenge to the Local Plan making process. To address this, and to provide the appropriate strategic framework for future Local Plans, the housing targets in the draft London Plan should extend to at least 2031 to take account of Local Plans' preparation time.

User:	Alison Hatt

Housing: this is beset by problems: loss of council housing stock over the last 30 years, much of it to private landlords, foreign investment in properties that are subsequently left empty, ludicrous house prices coupled with outdated council tax rates, substandard dwellings. Policy H1's proposal to make greater use of brownfield sites (and protect green belt land) is right. Getting powers to councils purchase longstanding empty buildings is an urgent requirement. Converting unused/empty small shops is an imaginative advance too.

User:	Alison Hatt
A definition of ‘affordable’ housing would be helpful as well as requirements for developers not to renege on the percentages they build.	

User: West Sussex County Council

Housing provision to 2028/29

1. The Plan's approach of developing on brownfield land first is supported. However, it is disappointing that the Plan only makes provision to 2028/29 when local planning authorities are required by national policy to plan for a 15 year period and to demonstrate how housing need will be meet during that period.
2. Furthermore, the County Council is concerned that the Plan only makes provision for the delivery of around 65,000 additional homes per annum to 2028/29 against an assessed housing need of about 66,000 homes a year. Also, the Plan does not address how this shortfall will be met.
3. The County Council is concerned that the focus on meeting need to 2028/29 through higher density development and smaller sites is very challenging and will not be delivered by the London boroughs (as it requires a significant increase over current delivery rates). This is likely to result in an even greater shortfall during that period and the burden to meet this need will fall on the authorities outside London (who will struggle to meet their own need given constraints including Green Belt, protected landscapes (including National Parks and Areas of Outstanding Natural Beauty), and other environmental designations, including nature conservation sites of international importance).
4. Therefore, the Plan should identify short/medium-term contingency measures to provide flexibility and to address need to 2028/29 if the strategy fails.

Housing provision between 2028/29 and 2041

1. The County Council is concerned that the plan does not identify housing need in the period between 2028/29 and 2041 and that there does not seem to be any analysis by GLA about the numbers that London could accommodate need post-2029. Therefore, although a plan, monitor, manage approach is understood, the Plan should set out some evidence-based thinking about post-2029 provision, including scenarios re possible housing need and strategic options to meet need to 2041.

User: Hampshire County Council

Overall, Hampshire County Council is supportive of the approach the Plan takes, particularly in relation to meeting housing need. However there is concern that the Plan is not always clear how the intentions expressed in the ‘preamble’ and supporting text to policies are translated into the policies themselves. In other words while intentions may be set in supporting text, unless these are clearly followed through in the policy it is unlikely that they will be realised. This is of particular concern in relation to meeting housing need.
Identified Housing Need and Willing Partners for Growth

The draft Plan now aims to meet virtually all the housing need for the Plan area within its own boundaries to 2029. Whilst this is welcomed, the County Council notes that this is a very ambitious target (65,000) and would require a doubling of the current house building rate. Even if these rates of delivery were to be met there is still a 1,000 homes gap each year (total of 10,000 homes) that would need to be accommodated outside London. The Plan emphasises that ‘willing partners’ outside London might help accommodate some of its growth as ‘a prudent long term contingency’ if London cannot meet its housing needs. The County Council is concerned about the deliverability of the Plan based on this approach, where upon there is no comprehensive delivery strategy for the full identified need of 66,000 per annum, with a substantial quantum of identified housing need remaining unplanned for. In a district council context, this would deem a Plan undeliverable and unsound. The County Council therefore recommends that the Plan should be amended to clearly identify how this unmet need is to be dealt with, along with setting out what happens if delivery fails to keep up with the ambitious targets set out in the Plan.

The County Council acknowledges that the Plan proposes that unmet need is ‘delivered’ through the continued emphasis on ‘willing partners’. In the wider context of the relationships between the capital and its surrounding areas, this approach is welcomed. The County Council supports authorities should they wish to embark on such a relationship with the GLA, given the points previously made about the importance of the inter-dependencies between the regions. However, what the Plan fails to reflect is the existing pressures and constraints that neighbouring authorities already face, with significant housing pressures and growing infrastructure deficiencies and expanding deficits. It is vital therefore for the Plan to set out exactly how the necessary infrastructure would be funded and provided to support any additional housing provision, should willing partners come forward. The Plan references the potential mutual benefits of working with willing WSE partners to deliver growth and infrastructure but there is little detail on delivery mechanisms. It is this lack of guarantee on the delivery of supporting infrastructure which currently restricts potential partners coming forward, even if such a move would support local growth ambitions.

The relationship between authorities in this area means that this is not just a requirement of the London Plan. The emphasis should also be on willing partners. The Plan should therefore set out how both the GLA and neighbouring authorities will work together, with one voice, to develop a clear economic strategy and Infrastructure Delivery Plan to enable all parties to lobby government for the funding and support required to ensure the growth of London continues to be supported by its neighbours, and allow all authorities concerned to continue to reap the benefits of the wider south east’s economic performance.

User: London Borough of Redbridge

We welcome the Plan's aspiration to achieve a level of housing supply that broadly meets London's needs. The level of housing need in the borough is high, both as illustrated in the London Plan SHMA and in local data in terms of homelessness and the housing register.

Policy H1 sets a very challenging housing target for Redbridge. Over the next ten years, Redbridge will be required to provide a minimum 19,790 homes. This is a significant increase of 76% on the current minimum target of 11,230 homes (ten year period). In contrast, our emerging Local Plan proposes a capacity of 17,237 homes over 15 years or 1,149 pa. Outer London is supporting a proportionately greater share of development proposed in the London Plan.

The Council generally supports the methodology and process undertaken to develop the 'large site' (10,380 homes) element of the proposed housing target having worked closely with the GLA on the SHLAA process. It is the small sites target set out in policy H2 which raises more significant concerns.
Redbridge has been set a new ten year small sites target to provide a minimum 9,380 (938 p.a) new homes. This is just under the borough's existing minimum housing target for all sites (1,123pa) which is a considerable challenge in the borough's suburban context as well as the fact that we have struggled to meet our minimum target in recent years.

In addition, the plan's proposal to increase housing density of existing residential homes within PTALs 3-6 or within 800m of a tube station, rail station or town centre boundary is of significant concern to the Council.

Small sites are defined as development providing 1 – 25 new homes. This definition is contrary to the NPPF development thresholds. Within the context of Redbridge a development of 10 or more units would be considered 'major' development. The Council considers that the Mayor's definition of a 'small site' should accord with the NPPF and be redefined as development of 9 or less units. The implications of the Mayor's small sites policy will be significant. Indeed, approximately 82% of all new homes are delivered on sites which are between 1 – 25 units.

User: London Borough of Enfield

1) Large areas of Enfield have PTAL levels lower than 3. The Draft London Plan should clarify its position on optimizing housing delivery, this should not be restricted to levels 3-6 but in all areas of the built up area as appropriately identified through Local Plans.

2) Whilst supporting the Mayor's ambition to address the housing crisis in London we remain concerned that the draft plan fails to provide the level of flexibility to allow Enfield to help the Mayor meet London's housing need. Innovative approaches to policy would be welcomed as opposed to an over dependence on small sites coming forward and generic presumption in favour of high densities that would promote inappropriate development.

3) Affordable housing policy goes against evidence which states that 65% of London's delivery should be affordable. There should be an early review of H5 in the event that more grant funding can be levered into delivery of affordable housing to meet the SHMAA assessed need.

4 We have serious reservations over the lack of collaboration on the methodology behind the proposal for a 'small sites top-up' and therefore the soundness of this policy assumption in meeting housing need which fails to reflect the track record of evidenced delivery.

User: Epsom & Ewell Borough Council

Duty to Co-operate

Throughout the original London Plan and the FALP, the need for a partnership approach to plan-making and addressing the key strategic issues, both by the Mayor and individual London Boroughs, was clearly stated. This has continued through to the new draft London Plan with a specific policy focusing on collaboration in the Wider South East (Policy SD2).

As a local authority immediately adjoining the Greater London boundary, it is extremely important that Epsom & Ewell continues to be informed of the continued development of the new London Plan. In particular, the proposed Kingston Opportunity Area.

However, relating back to the Mayor's own comments regarding the series of complex and interlinked sub-markets, the Mayor should acknowledge and recognise the findings of the Kingston & North-East Surrey SHMA (2016). This evidences that Kingston-upon-Thames falls within a sub-housing market area that includes the Surrey Authorities of Elmbridge, Epsom & Ewell and Mole Valley.

On this basis, the Borough Council disagrees with the Mayor's statement that because of London's ability to plan strategically, boroughs are not required to carry out their own housing needs assessment but must plan for, and seek to deliver, the housing targets in the Plan.

Kingston is part of the Kingston and North-East Surrey Housing Market Area (HMA) and the Mayor is required to acknowledge this under the duty to co-operate. It is therefore the Borough Council's view that any housing delivery over the housing target for Kingston, as set out in the London Plan, is equally apportioned to London and the remainder of the Kingston & North-East Surrey HMA. This would also include a proportion of any housing delivery provided through the Opportunity Areas. Such an approach would recognise the linkages that exist between these areas, emphasising and truly embracing the duty. It is considered that the Planning Inspector would recognise the benefits of such an approach and the logic and pragmatism behind it and would expect this to be fully explored through a Statement of Common Ground with the HMA authorities.

User: Maldon District Council

Housing

The annual housing target being set in the London Plan is a significant increase in the need identified in the previous SHMA in 2013 of just under 49,000 dpa, and as the targets run from 2019, the acceleration in growth needs to be immediate. Furthermore, as the table below explains, the annualised net housing completions for the preceding five years was just over 25,000: approximately half the previous London Plan target. The jump to 65,000 represents a 160% increase in the number of dwellings to be completed annually against that achieved in the previous 5 years. This represents a level of housebuilding not seen in London since the 1930s (as set out in Fig 3: Gross new housebuilding in Greater London, 1871 to 2016 of the 2017 SHMA).

This creates two major risks: firstly, in the time of the previous London Plan the housing target was not achieved, and without interventions outlined in the Infrastructure section of the Plan, the Mayor recognises the risk, stating in paragraph 4.1.3 that:

‘To achieve these housing targets the overall average rate of housing delivery on both large and small sites will need to approximately double compared to current average completion rates. The Mayor recognises that development of this scale will require not just an increase in the number of homes approved but also a fundamental transformation in how new homes are delivered. The London Plan, London Housing Strategy and Mayor’s Transport Strategy together provide a framework to help achieve this ambition but achieving this step change in delivery will require increased levels of funding to support the delivery of housing and infrastructure, which is discussed in more detail in Chapter 11.’

It is questionable whether this level of investment is viable or deliverable and without it the housing targets are no achievable. This will leave pressure on districts throughout the wider region to meet London’s need and the Plan’s implementation cannot

The second risk is that if London does not achieve this quantum leap in meeting its need, pressure will mount on the wider region to take additional growth and the influence and impact of meeting London’s need in future local plans will continue at the same of greater levels that at present. This will push up the need for additional housing in the wider region, and the figure of 1,000 dpa in the wider region would be unrealistic.
On this issue the London Plan must be robust and sound in what it can achieve. Unrealistic ambition will create uncertainty for the wider region and its relationship to London.

User: Suffolk County Council

Housing

The recent review of migration research undertaken by the London School of Economics1 (LSE) highlights the wide extent to which the migration flows from London affect areas, such as Suffolk, that are not the capital's immediate neighbours. Suffolk is not only a recipient of direct moves from London but is affected by a complex chain of movements, whereby an external demand to move into an area stimulates some existing residents to move on and further out. The LSE's review also highlights how London attracts younger people, particularly graduates.

The LSE's review also highlights that there is no precedent of London having delivered enough housing to meet its identified need within the capital's boundaries. Its population has grown, however, as people have accepted living at higher densities. The London Plan rightly focuses its attention towards meeting its need through higher densities for new development but increasing densities within existing housing is also likely to contribute to meeting need. The emphasis on delivering developments at greater densities is a key component of the draft London Plan and to achieving the aim to make sufficient provision to accommodate the projected growth within London.

It is unclear how the Mayor will ensure living standards are still maintained and do not lead to overcrowding where existing housing continues to accommodate higher densities, and how the challenge of London's housing need might be impacted if people, such as recent migrants from poorer countries, cease to accept higher densities.

Whilst the draft London Plan goes up to 2041 and contains an ambitious 10- year housing supply, it is less clear across the policies what will happen with housing in the longer term. Furthermore, it is unclear what the intentions are with regard to the annual shortfall of 1,000 homes between identified housing need and housing supply.

Given the scale of the challenge ahead it would seem prudent for the GLA to plan for the possibility of failure to deliver and the Plan is not as clear as it might be in terms of what would happen were failure to materialise. Monitoring the relationships between delivery of the draft London Plan alongside indicators such as actual migration flows and commuting now appears to be a critical feature and one which authorities in Suffolk would wish London to consider further.

The application of higher accessibility standards, alongside the application of the national space standard, is a commendable approach to addressing an ageing population.

1 LSE (2018) Review of Research on Migration Influences and Implications for Population Dynamics in the Wider South East http://www.eelga.gov.uk/news/wider-south-east-migration-review-published/

User: Royal Borough of Greenwich

Many boroughs, including Royal Greenwich, have chosen to introduce a policy in their local plan to make clear the circumstances in which back garden development may be appropriate. In contrast, the draft London Plan assumes a blanket presumption in favour of back garden development without any detail of the circumstances in which this may or may not be appropriate. This will lead to inappropriate development in back gardens that will harm the amenity of adjacent occupiers.

Residential gardens also provide vital green infrastructure functions such as reducing surface water flood risk, providing important habitat, and contributing to biodiversity and adaptation to climate change. The mitigation measures proposed where the loss of green space occurs as a result of small housing developments are narrowly focused on no net loss of green cover. This approach does not sufficiently recognise the multifunctional role of residential gardens, and the proposed approach would have serious negative environmental implications for the borough. Back garden development is not a regional issue and should be left for boroughs to deal with in their local plans.

User: London Borough of Harrow

The draft Plan identifies housing need in London as 66,000 homes per year, based on the GLA prepared Strategic Housing Market Assessment (SHMA). Based on work commissioned by the West London Alliance (WLA), the Council considers that the average household size predicted in the London SHMA and draft London Plan is potentially too low, and does not adequately reflect changing patterns of living and evolving definitions of what a household is. This under-estimation of average household size means that housing targets set in the Plan are potentially higher than needed and of the wrong sort (size) required by London's current and future population the London SHMA. New projections prepared by the ONS (rather than CLG) due to be released later in 2018 may provide a better reflection of household sizes.

The draft Plan proposes a significantly different approach to housing, with a much greater

reliance on windfall / small sites, particularly in Outer London. The proposed housing target for Harrow is 13,920 homes (1,392 homes per annum), which represents a 135% increase over our current target of 5,930 homes (593 homes per year). The Council is concerned about the scale and deliverability of this increase which is significantly greater than the 55% increase across all of London.

Our concerns are three-fold and relate to the proposed reliance on windfall / small sites, which the draft Plan indicates will contribute 965 dwellings per year out of the overall target for the borough of 1,392 homes per year (i.e. 69% of our overall target, compared to 38% of the overall London-wide target).

Firstly, the Council has significant concerns about the methodology used to identify the housing capacity of small sites, noting that this methodology and approach to small sites were not discussed with boroughs prior to the draft targets being set. The Council considers the methodology is not robust, in that it uses a 'proxy' for potential housing yield from small sites rather than a detailed assessment of the potential capacity from the three potential types of small sites capacity identified in Policy H2 Small Sites of the draft Plan.

The small sites targets set in the draft Plan are therefore not considered to be based on robust evidence and are most likely to be an overestimation of capacity. Such a reliance on uncertain, unidentified windfall / small sites is itself is considered contrary to the National Planning Policy Framework.

Secondly, the Council considers the small sites targets are undeliverable. Harrow currently averages around 125 homes per year from small sites in a relatively supportive policy environment. The proposed small sites target of 965 homes per year therefore represents an 8-fold increase from such sites. The proposed small sites policy and its presumption in favour of housing development on sites are unlikely to achieve such a significant increase in delivery of housing on small sites. The draft Policy is not supported by any evidence that indicates why such sites have not been coming forward at the level anticipated by the GLA and how the draft Policy will address these reasons.

Thirdly, the Council has concerns about the fragmented and dispersed nature of sites coming forward through the small sites policy and the implications of this for infrastructure planning (for example, see transport below) and the Mayor's desire for 'good growth'. Such sites are also constrained with respect to how they can deal with other policy requirements such as flood risk / urban greening.

User: London Young Labour

Introduction

‘The housing crisis…can affect social cohesion, cause poor health and plunge residents into poverty. I cannot overestimate how terrible a situation we inherited.’ Sadiq Khan, Mayor of London.

London Young Labour (LYL)’s policy submission to the London Plan is on behalf of tens of thousands of young members across London, comes at the end of an extensive process, where we consulted our members across the city.

We canvassed members’ views using an online form to ask what they felt the most important campaigning issues were; housing and housing related issues topped the ballot, with well over half the total votes cast. Our members also named specific issues around high rents, renters’ rights, and the housing shortage among their top priorities.

LYL then elected housing as its priority campaign at our summer conference in 2017 after hearing from a housing panel that included Mayor Phil Glanville from the London Borough of Hackney, John Elledge from the New Statesmen and Anthony Breach from Centre for Cities.

As part of our priority housing campaign, we hosted a policymaking session where we discussed and agreed the policy submissions in this document. They represent a broad range of opinion from across our membership and show how committed our young members are to shaping the future of London.

This submission focuses solely on housing and its associated policy areas. It is largely, therefore, a submission to Chapter 4 (Housing) but also touches on areas such as the Greenbelt (Chapter 8, G3) where the issue’s relationship with housing is, in our view, inextricably linked.

London Young Labour campaigned hard in 2016 for a Labour Mayor in City Hall and strongly support the Mayor’s efforts to tackle the housing crisis in London. We know, however, that the housing challenges London faces are varied and complex. Councils across London have developed individual strategies to help mitigate housing issues while hampered by severe financial restrictions from central Government. London-wide guidance from City Hall that considers the human cost of austerity and provides direction to councils will go a long way to delivering against the increasing needs of Londoners.

We hope you consider these submissions to the new London Plan

User: Aspire

Affordability

Another primary obstacle that many of our service users encounter in acquiring a home that meets their needs is the shortage of genuinely affordable wheelchair accessible homes in London. Aspire therefore welcomes the Mayor's commitment to bringing forward homes that are genuinely affordable to Londoners on low and middle incomes, in the form of "affordable rent, London Living rent and London shared Ownership.

We do however have some concerns about the delivery of affordable homes across the full range of tenures. In our experience, where development schemes have committed to provide a range of affordable housing for social rent and shared ownership, it appears that it is largely the shared ownership element that is completed first, with long, sometimes indefinite delays on delivery of the social component. We would therefore urge the GLA to require developers and local authorities to work together to ensure that new housing developments deliver tenures concurrently rather than phasing delivery of the social component for the latter stages of the project.

For a number of our service users, shared ownership presents a particular difficulty, as the financial terms and conditions for this tenure often exclude them, for the following reasons:

1. If you have bought into a SO scheme before you have become disabled it is a very hard and lengthy process to resell the property and the Landlord is often of little or no help in trying to sell. They have no obligation to "Buy Back" or help you.
2. To buy into a SO scheme there is an expectation that you are working and not claiming Housing Benefit, so even if you have enough from the sale of your previous property for a good deposit, having sold your own property following an injury, people are often refused unless they have an income of 30k or more and are not claiming benefits.
3. Even when proving that all the service charges are eligible for Housing Benefit or that they can make up the difference from other income such as PIP or supported work they have been refused.
4. When the SO property is a new build we have found that the owners will not allow any adaptation work in the first year owing to the snagging processes. This means that if you are disabled and need a wet room you are able to buy into the scheme but can make no changes within the first year and after that, you have to go through a very difficult process to get permission to adapt at all, given that you only own a percentage of the property and not the whole.

We would therefore urge the GLA to work with Aspire and other disabled people’s organisations when developing the terms and conditions for “London shared Ownership,” to ensure that such structural barriers for disabled purchasers are avoided and/or removed from the scheme.We would also urge the GLA to meet with Aspire and other disabled people’s organisations to develop London-wide solutions to the shortage of accessible interim housing.

User:	The Wimbledon Society

Moreover, the draft Plan has a focus on new build, but underplays the importance of retrofit in our view. The references to retrofitting in the draft mainly focus on energy efficiency and environmental issues. We believe that retrofitting goes beyond these.

User: Just Space

Chapter 4 Housing

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

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

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

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

User:	HTA Design LLP

The Draft Plan makes an evident and concerted effort to enable delivery of housing through a range of avenues including through traditional housebuilder models for sale, but also through build to rent and delivery of small-sites by SME builders. Creating a less prohibitive development environment for a range of types of players is strongly supported and we believe that diversifying the contributors of housing development will help to increase the number of homes that can be delivered in London.

User: HTA Design LLP

We fully support the Mayor’s notion that large amounts of Green Belt do not need to be released to facilitate London’ growth and housing need. However, there are left over portions of green belt land within London that have become surrounded with transport infrastructure and other uses, that offer little biodiversity value and no access to green spaces for people, and it is important that these portions of land do not get protected at all cost. It is of utmost importance to very carefully approach what type of interventions would support health outcomes for London’s residents: as London’s existing fabric increases in density, we need to ensure accessibility for everyone to healthy, good quality green spaces. It is of utmost importance that. In instances where green space is protected, it provides a function to the public in terms of leisure, relaxation and activity. We cannot afford to protect ‘green belt’ that is not accessible to the public, in private ownership, and not fulfilling a function of providing some type of breathing space for Londoners.

User: Gidea Park and District Civic Society

We are concerned as to the sustainability of the obsession for growth and expansion within a relatively confined area even as large as London, it leads to ever more dense development and inevitable destruction of the very character you wish to retain.

Greater vision is required in addition to the obvious need to move some jobs away from London which will also ease housing demand. More people are to be crammed into high density developments causing overcrowding and social problems, will the actual designs match aspirations, past experience suggests otherwise ! The provision of infrastructure increasingly becomes proportionately more expensive.

The proposals to push more housing into the suburbs will totally undermine their character and is funding available for the necessary additional infrastructure ?

User: My Fair London

We support all efforts to increase the supply and quality of affordable housing in London.

Chapter Four is based on an analysis that London's housing crisis is fundamentally a problem of supply and demand. We suggest that this analysis is flawed. There is good evidence that our housing market has delivered a more or less sufficient supply of residential floor space over the last 30 years. What it has signally failed to do is to properly share out this space. Our housing crisis is in part therefore a crisis caused by the failure of a free market approach fairly to allocate the housing we have built. A few people are getting a lot more. Many are getting less or nothing.

The Mayor should use all the powers at his disposal to undermine investment behaviours that see housing as an asset class. A twenty year period of flat house price growth would be very good for the majority of Londoners. Population figures show we must build more housing, but more than ever we must ensure that what gets built is properly shared out. Many of the problems that bedevil housing in London flow from the behaviour of investors, lenders, and the rich. We are not convinced that the London Plan as drafted takes a radical enough approach to counter the negative consequences of the way the current property market fails to work.

Finally, although we know it is outside the scope of the London Plan itself, to deliver his ambitions for London we would encourage the Mayor to continue to lobby for powers to levy additional and reformed progressive taxes on property assets and on profits derived from increases in land value. This would be a very direct way to redistribute resources and to help make London a fairer city.

User: Kingfisher PLC

The Importance of Home Improvement Stores to London's Housing Goals

Kingfisher's ambition is to make home improvement accessible to everyone. We agree with the principles set out in the Mayor's draft Housing Strategy and 2050 Infrastructure Plan that housing should be a planning and an infrastructure priority for the capital.

We recognise the Mayor's observations that London's housing stock is ageing, should be adapted to the population's diverse needs and should become more energy efficient to tackle fuel poverty[1]. We agree that homeowners need to be incentivised to undertake home improvements to address the £6bn of basic repairs needed to existing housing stock[2], as well as the need for 66,000 extra new homes to be built in the capital each year. On energy efficiency, our target for 2025 is to bring our customers the products, services and advice they need to achieve a 50% reduction in their home energy use.

It is our view that our B&Q and Screwfix stores have a fundamental role to play to help Londoners improve their existing homes as well as to provide our trade customers with the right tools and materials to contribute their skills to creating new homes for the capital.

In addition, through our charity partner Shelter, we are supporting one of their DIY Skills Advisers based in their Hackney hub, supporting people and families with their home improvement projects in London. Since the partnership with Shelter was launched last year, London's B&Q stores have raised £15,000, which will all go towards frontline services supporting around 14,000 Londoners.

To achieve these mutual goals of adapting the current London housing stock for the population's current needs and to build the new homes needed, it is crucial that residents and trade customers have good accessibility to home improvement stores, including our B&Q and Screwfix stores.

Without a sufficient provision of home improvement stores within the capital, it will be more difficult for customers to carry out maintenance, repair work and larger projects in their homes and for trade professionals to access the tools that they need to help maintain the new homes built in the capital.

Below we set out our concerns around the proposals included in the draft plan [Policy H1 Increasing Housing Supply] to redevelop retail and leisure parks to deliver housing intensification.

We would emphasise that we do not oppose the principle additional housing to be included within retail parks, but due consideration needs to be given to retain or adapt the existing retail floorspace and car parking provision to ensure that new residents will have access to the products they need to maintain and repair these new homes.

[1] Draft London Housing Strategy Consultation, pp.14

[2] Ibid, pp.129

User: National Housing Federation

We welcome the centrality of housing to the draft Plan and the Mayor’s recognition that increasing the supply of affordable housing is his main priority. Good quality, affordable housing has a crucial role to play in delivering a city that works for all Londoners.

Housing associations working in London share the Mayor’s ambition to significantly increase the number of affordable homes being built. They already deliver the overwhelming majority of new affordable homes and are committed to working closely with the Mayor and partners across London’s 33 boroughs to deliver even more.

User: Zacchaeus 2000 Trust

CHAPTER 4 - HOUSING

London has been stuck in a housing crisis for a generation or more. Some commentators have denied the crisis exists, and until fairly recently most others have chosen to ignore it. But today that crisis is undeniable. Its impact is now felt not only by those suffering at its sharp end, it is felt too by the young professionals paying out half of their income to rent a room in the private rented sector (PRS) and the working families who can't get their foot on the property ladder. If anything, the evidence suggests these trends will get worse not better in the years ahead.

While we would accept the general premise that there will always be more demand for affordable housing in London than there are homes to meet that demand, it is clear that the policies pursued by central Government since 1979 have made this crisis much worse than it would otherwise have been. In particular, the forced sale of local authority-owned housing through the Right to Buy and the *de facto* prohibition on new council housebuilding were absolutely disastrous.

More recently, the Coalition Government's cuts both to investment in new social housing and the Housing Benefit available to help those on low incomes living in the PRS have reversed the limited progress made by its predecessor and the Mayor of London between 2005 and 2010. The extra funding announced since 2016 still only brings capital investment up to the levels of a decade ago. The cuts to Housing Benefit are unprecedented – the Local Housing Allowance (LHA) rate in most London Broad Rental Market Areas is now well below the average of actual rents.

Z2K's staff support hundreds of those experiencing the most acute housing problems every year, addressing the multiple challenges they face as a result of years of policy-making that has not addressed their basic rights. Many are homeless. Others are overcrowded or living in poor quality and even outright dangerous conditions. Most are struggling to pay the rent from their very limited incomes. Very few of these clients will realise the dream of the decent, secure and affordable homethey need and deserve. Given the nature of our work, this submission focusses on those parts of the draft strategy which we think are most relevant – affordable housing and homelessness. It also explains why we argue for more to be included in the final strategy to help overcrowded families.

User: Ministry of Housing, Communities & Local Government

It is vital that your new London Plan provides the strategic framework to help deliver the homes that London needs. As it stands, I am concerned that the current draft will not do so and will not achieve the step change in housing delivery that London so clearly needs. Government is committed to a plan led system – but we are clear that plans must start with an honest assessment of need. I am concerned that the assessment of housing need you have used for the purposes of your draft Plan does not reflect the full extent of housing need across the capital to tackle affordability.

As you know, the Government is proposing to introduce a new way of assessing housing need, following consultation last year. Planning authorities and communities need to properly understand how many homes they need to build in their area. The local housing need methodology is intended to create a clear and transparent system that will set out the minimum number of homes that plans should deliver. This will help ensure there is consistency across the country as local areas work to deliver the homes that communities need. I am clear that this should include London.

I am equally clear that any plan alone will not deliver new homes or improve the communities in which people live. Delivery will require strong and proactive leadership, and for you to take responsibility for creating the conditions that will see necessary development come forward. In that context, we have heard concerns that the detail and complexity of the policies within the draft have the potential to limit accessibility to the planning system. This would, of course, be a significant issue for many of the small to medium sized developers that you are depending on to deliver the step change in housing supply that London so clearly needs. I would urge you to listen to representations on this point.

We have also seen concerns expressed by local authorities in London and other commentators that your draft Plan strays considerably beyond providing a strategic framework. London will only deliver the homes that people need with strong collaboration, focussed on delivery. I am concerned that your Plan does not go far enough in explaining how you will achieve this – both in terms of collaboration between boroughs, and considering the impact London has on its neighbouring areas. I want to be assured that you are taking steps to put arrangements in place that will achieve this.

User: London Federation of Housing Cooperatives

Additional Policy – Co-operative / community led housing.

We propose that the Mayor should

i. work with existing, newly formed or developing London-based co-operatives, TMOs and CLTs to assess their existing and future potential (including resources and capacity) to develop new social / low-cost rented homes;

ii. with the boroughs, identify and set aside public land that might be available to them to deliver community led housing;

iii. with the boroughs, develop a London-wide list / online map of potential small development sites to match co-operatives / community led housing organisations with available development sites (particularly public land) for homes that will remain in perpetuity at costs that can be afforded by households of below median income levels;

iv. provide support social housing tenants who wish to manage or collectively own their own homes.

User: West London Alliance

Delivering the housing that a growing population needs is rightly the top priority in the London Plan. It repeatedly emerges as the highest concern for Londoners in surveys, and increasingly businesses too are identifying it as a constraint on future success as they struggle to convince new talent to relocate to the capital as a result of the high cost of living.

West London councils share the view that, whilst a step change in the rate of housing supply is required, the **housing targets** described in the London Plan are not supported by a robust or definsible methodology. Specifically, the joint West London SHMA we have recently commissioned together suggests that the average household size predicted in the draft London Plan in the coming years is too low, and does not adequately reflect changing patterns of living and evolving definitions of what a household is. This under-estimation of average household size means that housing targets set in the Plan are systematically higher than needed, and of the wrong sort, as required by London's current and future population.

KEY ASK 3: We would welcome a constructive dialogue with the GLA Housing Team to review housing need methodology that has been used to set borough housing targets, particularly in relation to household size and composition projections, so that we can arrive at mutually agreed housing targets that meet the evidence-based needs of Londoners. Furthermore, the GLA should indicate that it is willing to keep borough housing targets under review as new population projections become available in the coming months, for instance from the ONS.

The draft London Plan puts emphasis on the role of small sites being used to deliver a significant proportion of the supply targets in boroughs. Small sites will of course have a role in delivering the homes Londoners need, however the level of emphasis put on these sites to deliver homes at the scale required is unrealistic. For example some boroughs in West London who already have permissive planning codes relating to small sites, in line with those proposed in the draft London Plan, will be required to increase delivery tenfold. This is simply unrealistic and may set the system up to fail to deliver the targets, reducing the credibility of the entire system.

KEY ASK 4: The focus on small sites in the draft London Plan should be rebalanced with options for boosting supply in other types of site given a higher level of emphasis than is currently the case. West London boroughs would welcome further dialogue with the GLA to get the balance between small sites and larger sites right, particularly in light of the relaxing of the density matrix.

The relaxation of the density matrix is supported by West London boroughs and is welcome, particularly the emphasis in policy D6 on taking a design-led approach that makes the best possible advantage of new infrastructure link. This move will allow boroughs to take a more flexible, strategic approach to place making, delivering a step change in supply in some areas where this is appropriate for the local context, and also allow new communities to be developed around the new infrastructure hubs and connection such as the West London Orbital line) that will become increasingly important as Londoner's increasingly move away from the private car and towards public transport, cycling and walking.

Continued car use in the lower density suburbs of Outer London remains a reality, irrespective of public transport service and reliability improvements. We therefore advocate more flexibility to support more local evidence based approaches to car parking, which are less restrictive than the London Plan for residential development (see ask 7 below).

Innovation led by both the market and by public services will become increasingly important in the future in order to meet housing need. West London boroughs are concerned however that some of these models, particularly those based around "collective renting" models, are potentially restrictive and exploitative to individuals, and whilst they may have some role to play, their place in the future London housing mix, and their implications on community cohesion and place making, should be carefully considered by the Mayor.

User: Roca Investments

Discretionary Social Housing Relief

The Mayor is asked to consider the use of Discretionary Social Housing Relief (DSHR) to encourage more innovative affordable housing models to come forward and help deliver more housing. . At present due to the wording of the CIL Regulations only social and affordable rented housing, intermediate rented housing and shared ownership housing benefit from mandatory SHR. There are very few examples where a Borough has enacted DSHR. This adds significant cost to developers wanting to deliver other forms of genuinely affordable homes for young people, single households and older household requirements. Smaller households are often better suited to be delivered as part of mixed use sites (particular smaller sites).

We would welcome the Mayor leading by example and enact DSHR on Mayoral CIL. This would encourage and incentivise boroughs to do the same. This would potentially deliver more housing and jobs and contribute to infrastructure via CIL.

User: Mill Hill Preservation Society

Amongst the items that seemed particularly detrimental to Mill Hill residents have highlighted:

- Increasing the density of existing residential homes within PTALs 3-6 or within 800m of a Tube station, rail station or town centre boundary (small site development).

- Redeveloping retail and leisure parks to deliver housing intensification.
- A positive approach to the Build-to-Rent sector.
- Scrapping PTAL density ratings.
- The ability to ‘swap’ designated Metropolitan Open Land. (Policy G3C should be deleted.)

Residents are concerned at how these proposals will impact on the future development of Mill Hill – particularly in relation to The Broadway, Mill Hill East, the redevelopment of Pentavia Retail Park and the Neighbourhood Development Plan that is currently being written.

User:	Mill Hill Preservation Society

The Society are also pleased to see standards being set for dwelling sizes and storage as in our experience there have some been some local applications proposing undesirably small dwellings.

User: London YIMBY

Our overall response:

In general, we support the draft New London Plan and its ambition to strongly increase the rate at which London builds high-quality homes. The analyst Neal Hudson has shown that since WW2 this country has never got back to the rate of percentage growth in the number of homes achieved in the 1830s, let alone the 1930s. London has never remotely got back to the build rates of the 1930s, as the Outer London Commission has demonstrated. As a result, homes have become ever more unaffordable. Tenants are increasingly squeezed into tight, poor quality, insecure and needlessly expensive living conditions. The many who cannot afford to live in London are deprived of opportunities for the best jobs and training.

The analyst Matt Rognlie has shown that housing is the main cause of inequality. We esimate that failure to build enough housing and infrastructure over the last 40 years in places like London hasimpaired GDP per head by approximately 25% https://capx.co/the-housing-crisis-an-act-of-devastating-economic-self-harm/ . If true, that represents more damage to GDP than any other single event since the Black Death of 1348-9 – including both World Wars.

We desperately need more housing to make London a more walkable, fairer and more liveable place. That can and should be done without any loss of quality. In fact, we should be able to do it while making London better for nearly everyone.

London YIMBY is a grassroots campaign to end the housing crisis with the support of local people.

User: Claire Mellish

Chapter 4 Housing

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

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

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

User: London Wildlife Trust

Provided housing is located in the right place and planned with nature in mind, housing can be delivered to minimise its harm to wildlife and secure benefits for biodiversity. We strongly support the Government's 25 Year Environment Plan's commitments to ensure that "new development will happen in the right places, delivering maximum economic benefit while taking into account the need to avoid environmental damage…' and achieve 'high environmental standards for all new builds…" (p35). The Wildlife Trusts have also set out our own view as to how best this may be achieved.8

London Wildlife Trust's work with Berkeley Homes at Woodberry Down, Kidbrooke Village and Southall Waterside is demonstrating how high density new housing can be built with nature in mind. Woodberry Wetlands, developed by the Trust (with support from Berkeley Homes, Thames Water and Hackney Council) has informed the regeneration of Woodberry Down, and provides a wildlife rich space for residents and other local people to enjoy free of charge.9 It is featured in the (previous) Mayor's Green Infrastructure Taskforce Natural Capital report as a case study.10

User: Community Led Housing London

4. Proposed new Policy H19

As set out above, we believe the current wording of Policy H2 will not support community led housing unless sites are specifically identified, allocated or safeguarded for community led housing.

The following policy, or similar, would have the effect of addressing the issue of "access [to] suitable and affordable land" described in the London Housing Strategy, by helping to dampen land values for certain allocated sites. The policy allows for an element of competition between community led housing groups and organisations, but this will not be as great as with private speculative development. Development would still be expected to meet policies such as Policy H7 Affordable housing tenure.

Policy H19 Community led housing

A Boroughs should work positively and collaboratively with community led groups and organisations who support such groups to identify and allocate appropriate sites for community led housing. These may include sites of any size, and may also include sites not considered suitable for other forms of development.

B Applications for community led housing which meet the wider objectives of the Plan should be considered favourably.

4.19.1 Community led housing [footnote to Glossary] groups and organisations face a range of challenges. In particular, they may struggle to access suitable and affordable land, given the nature of the developing body. The planning system should take a **positive approach to community led housing** to enable it to better contribute to the delivery of new homes. Community led housing can make a positive contribution to increasing housing supply and have a number of additional social and community benefits.

4.19.2 Community led housing can take a number of forms including community land trusts, cohousing, co-operatives, CICs, and non-profit self-build groups, and can be delivered in a number of ways, including through:

? start-up groups responding to housing need or demand, or groups of people seeking to deliver their own homes;

? the extension of existing community-based organisations to provide housing in addition to their existing activities, for and on behalf of the community;

? partnerships with developers and housing associations supporting a community group to deliver their ambition.

4.19.3 Sites which may not normally be considered suitable for other forms of development may generate support for community-led housing, amongst the local community. A more sensitive and inclusive approach to the development of these sites may make them more suitable for development.

4.19.4 Communities may be geographic and local, and may also be ‘communities of interest’ over a wider geographic area, such as older people, or those who have signed up to co-operative principles. Membership may not always be confined to borough boundaries or eligibility requirements, given the operation of the London housing market.

User: N\A

Chapter 4 Housing

The Plan is informed by the GLA's 2017 London Strategic Housing Market Assessment, and that assessment has identified a need for 66,000 new homes per year, which is ambitious.

There may be differences of opinion between the Mayor and boroughs over whether this is achievable, but as worrying to me is the need to tackle the construction skills gap, not least in the context of the possible terms of our exit from EU.

One of the stand out statistics for me in the SHMA relates to demographic trends suggesting London's population is projected to increase by 79,000 every year, reaching 10.5 million in 2041.

This rate of increase is actually substantially less than the rate of population growth in the last decade and shows how our response as a city, particularly re housing challenges, has fallen short in the past. It would seem we are going to have to run very fast to catch up with past failures.

And it is not insignificant that the fastest rate of population growth is expected to be among older age groups. I am struck by the figures that by 2029 the number of older person households (ages 65 and over) will have increased by 37 per cent, with households aged 75 and over (who are most likely to move into specialist older persons housing) increasing by 42 per cent.

I am pleased to see Plan's acknowledgement that appropriate accommodation is needed to meet the needs of older Londoners who may wish to downsize, move closer to family or friends or be closer to services and facilities, but may not want to move into specialist older persons housing.

There is an important role for new, non-specialist residential developments to play in providing suitable and attractive accommodation options for older Londoners, particularly developments in or close to town centres, near to relevant facilities and in areas well-served by public transport.

I welcome the new definition for Gypsies and Travellers, as it is a great concern that Section 124 of the Housing and Planning Act 2016 removed the duty on local authorities under the Housing Act 2004 to assess the accommodation needs of Gypsies and Travellers in their area as a distinct category.

I am concerned about the draft Plan's suggestion that 2 bedrooms units could be considered as family provision. Although many families may live in smaller two bedroom homes, this is because of the high cost of accommodation rather than because it meets their needs. Families come in all shapes and sizes and the Plan should reflect that

I do not agree with the Plan's presumption in favour of back garden development without any detail of the circumstances in which this may or may not be appropriate. Residential gardens are important in reducing surface water flood risk, as well as helping cleanse the air we breathe. With the huge issue of air quality in London, the loss of gardens will only make this worse. Our green spaces are the city's lungs. I would like to see local authorities making decisions about when or if it's right to build on gardens rather than have a blanket London wide policy.

I support the introduction of a strategic affordable housing target of 50% and the proposal to review developments that do not meet the threshold approach. However there needs not to be a new definition of "affordable". At present the term has lost its meaning and will not deliver homes for those that need them. The public has lost confidence in the term "affordable housing" to provide the low cost homes needed by them and their families. "Affordable" should be linked to income and not market rents.

User: The Royal Society for the Protection of Birds (RSPB)

C) Sustainable homes for people and wildlife

The 25 Year Environment Plan (page 35) includes commitments to ensure that '*new development will happen in the right places, delivering maximum economic benefit while taking into account the need to avoid environmental damage…'* and achieve '*high environmental standards for all new builds…'*. **We strongly support those commitments.**

Provided it is located in the right place and planned with nature in mind, housing can be delivered in harmony with nature. Our collaboration with Barratt developments plc on a 2,500-home development in Aylesbury (known as Kingsbrook) provides a great example of how biodiversity can be built into new housing developments at scale (see the case study in **Annex 1** for more details). Kingsbrook has been included as a case study in recently published 25 Year Environment Plan (see page 147). It is also in the TCPA Planning in the Planning for green and prosperous places guide9. We would be pleased to work with the Mayor and partners to build on our expertise at Kingsbrook and demonstrate how housing can be planned, designed and managed for people and nature.

It is essential that the Mayor sets a strong policy framework and requires all new developments to be designed to the highest sustainability standards and for all developments to deliver net biodiversity gains following robust application of the mitigation hierarchy set out in paragraph 118 of the NPPF. Consideration should be also given to how the existing housing stock can be retrofitted to support biodiversity enhancements. We recognise that the draft Plan includes a number of policies which seek to deliver high sustainability standards, including *GG6: Increasing efficiency and resilience*, *SI2: Minimising greenhouse gas emissions*, *SI3: Energy Infrastructure*, *SI5: Water Infrastructure* and *SI12: Sustainable Drainage*. These policies could be better referenced throughout the Plan including in **Chapter 3: Design** and **Chapter 4: Housing**. We would also like policy wording to be strengthened i.e. ***requiring*** rather than ***aiming*** for particular standards. In line with earlier comments, we strongly recommend the Mayor seeks a similarly high level of ambition in respect of biodiversity, seeking biodiversity net gains at scale through a strategic approach and in respect of individual developments.

Biodiversity net gains could mainstream nature friendly features in housing developments such as seen at Kingsbook. A list of minimum requirements could apply to all housing developments to ensure a net gain for biodiversity on every scheme. With appropriate signage and education this could also encourage people living within these new developments to connect with nature. **There are a number of key tests which should apply to a biodiversity net gain approach which we have set out in Annex 2.**

9 https://www.tcpa.org.uk/Handlers/Download.ashx?IDMF=335bdb7f-e581-4d7c-9e5f-62605d62acdb

User: Reigate and Banstead Borough Council

The council notes that there are practical difficulties associated with increasing housing supply and the reliance on small sites. This is referred to in the responses mentioned at the beginning of this representation.

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

There is concern that development at the assumed densities will not provide sufficient family size homes. There are also doubts on the net housing yield from “estate regeneration”, a process which the London Assembly has shown to have reduced the stock of social housing over the last decade. There is a heavy reliance on small sites. This has much to commend it but would tend to produce only or mainly dwellings for the open market and thus not help

meet the backlog of need nor the top priority current needs. The New London Plan should impose a requirement for social housing contributions from small-site schemes.

London Boroughs are encouraged to support development on small sites, with presumption in favour of the development, and are given a target for small sites of about one third of their overall housing target. Small sites are more likely to deliver market housing; affordable housing “should only be required through off-site contributions” (H2 H) and boroughs “should be capable of securing cash in lieu” (4.2.12). They could contribute social rented housing elsewhere, but this is much harder to monitor and will inevitably be low in number.

It is noted that the risk of failure of these policies increases the potential for housing need displaced from London. This would have potential adverse impacts on areas such as Reigate and Banstead Borough. This is a risk that Good Growth will not be deliverable

User: Elaine Chambers

Additional Policy – Co-operative / community led housing.

We propose that the Mayor should

(i) work with existing, newly formed or developing London-based co-operatives, TMOs and CLTs to assess their existing and future potential (including resources and capacity) to develop new social / low-cost rented homes;

(ii) with the boroughs, identify and set aside public land that might be available to them to deliver community led housing;

(iii) with the boroughs, develop a London-wide list / online map of potential small development sites to match co-operatives / community led housing organisations with available development sites (particularly public land) for homes that will remain in perpetuity at costs that can be afforded by households of below median income levels;

(iv) provide support social housing tenants who wish to manage or collectively own their own homes.

User: Earls Court Public Sector Tenants' Assoc

Additional Policy – Co-operative / community led housing.

We propose that the Mayor should

1. work with existing, newly formed or developing London-based co-operatives, TMOs and CLTs to assess their existing and future potential (including resources and capacity) to develop new social / low-cost rented homes;
2. with the boroughs, identify and set aside public land that might be available to them to deliver community led housing;
3. with the boroughs, develop a London-wide list / online map of potential small development sites to match co-operatives / community led housing organisations with available development sites (particularly public land) for homes that will remain in perpetuity at costs that can be afforded by households of below median income levels;
4. provide support social housing tenants who wish to manage or collectively own their own homes.

User:	Mr Gordon Heath

2. Housing - Infill building in gardens, high rise buildings in town centres and undermining the Green Belt would all seriously detract from the look and feel of the Outer London Boroughs and the reason people want to live there. I do not see how it would be possible for Hillingdon to meet the target of 15,530 residential units over 10 years without causing serious irreversible damage to the character of the borough's towns and villages. Brownfield sites and the huge number of empty properties in inner and outer London should be brought into use first.

User: Richmond Heathrow Campaign

The replacement of the planning guidance PPG24 with a new National Planning Policy Framework and Localism Act has thrown into some confusion the ability of local authorities to prevent new buildings when noise levels are high.

The Land Use requirements of the International Civil Aviation Organisation's (ICAO) Balanced Approach is not helpful either. Not only are local authorities in a densely populated area, such as London, unable to find suitable sites for new housing while avoiding aircraft noise but the aviation industry cannot find suitable pathways for additional flights while avoiding the population. There is an irreconcilable stand off between housing need and additional flights.

The four elements of the Balanced Approach Guidance are listed below. The aim is to ensure that operating restrictions are employed only as a last resort after full consideration has been given to the other dimensions of the ICAO Balanced Approach, namely:
• Reduction of noise at source,
• Land-use planning and management,
• Noise abatement operational procedures,
• Operating restrictions.

Themain goal of the ICAO Land-use Planning is tominimize the population affected by aircraft noise by introducing land-use zoning around airports. Potentially it can also be used to ensure that gains achieved through less noisy aircraft are not offset by further residential development. As far as we are aware the design of flight paths to avoid dense populations is not part of the ICAO Land-use Planning. The one-sided approach is a major deficiency of the planning process.

The ICAO says “land-use planning and management policies should be used to prevent incompatible development in noise-sensitive areas. This action unites planning (zoning, easement), mitigation (building codes, insulation, real estate disclosure) and financial aspects (tax incentives, charges).” The ICAO Land-use Planning is not just about determining whether or not a site is suitable for housing but it can take into consideration mitigation and incentives for developers to mitigate noise. But a deficiency of the ICAO Land-use Planning is that the impact of aviation noise extends beyond the building itself and includes amenity in outdoor areas where mitigation such as noise insulation is not effective.

In the case of Heathrow and its expansion, which involves a large number of flights over heavily populated London, we do not believe the ICAO Land-use Planning process is fit for purpose. There is nowhere for housing and flights to go so as to avoid each other in a noise meaningful way.

But the tension between the need for housing and additional flights has to be resolved. Whether this means fewer houses or fewer flights is the issue. Noise mitigation is only a relatively small contributor to a solution. Local Authorities are tasked by the Mayor with housing targets but the local authorities just cannot deliver enough land for housing and accompanying schoolsand infrastructure while still ensuring an acceptable noiseenvironment. Airport Noise Action Plans are limited tomitigation and are not intended for flight path design. Design of new flight paths or changes to existing flight paths are required to be dealt with by the CAA Flight path Change Process and major expansion by the Development Consent Order Process. The Government, Mayor, Local Authorities and the aviation industry need to work together to find a solution.

ICAO Land-use Planning until recently applied the 57 dBLAeq contour to determine the areas and population within its scope. We believe this has been revised to a 54 dBLAeq noise contour, which covers a large area of London, as is shown by the 2016 noise contour in Annex 1. The area within the 54 dBA contour was 184.9 km2 and the population 616,000 and the number of households 254,000.

There are solid grounds for adopting a still lower noise contour. TheWHOguidance for daytime noise is 50 dBALAeq. The frequency of flights is important in determining the impact on the population and this is not well represented by the LAeq metric. The LAeq metric averages noise incidents over a summer period or a year and as such dilutes the noise of single events with respite and east/west modal changes. Noise contours understate the impact of overhead aircrafton individual flight paths and communities can be affectedway beyond the 54dBA LAeq contour and as far as 30 kilometers from Heathrow. There is ongoing debate between Government, the aviation industry and communities as to the metrics and differential impacts on people, which is important to the ICAO Land-use Planning process but we do not seek to engage in the debate here.

Table 4.1 of the draft London Plan sets out the ten-year targets for net housing completions which each local planning authority should plan for. The draft London Plan says that Boroughs must include these targets in their Development Plan documents. The 35 Planning authorities comprising wider-London are required to target 649,340 housing completions over the ten years from2019/2020. We do not know the population numbers but at roughly 2 persons per household then the increase approaches 1.5 million residents. A portion of these will be in the 54 dBLAeq noise contour.

It would be helpful for the draft London Plan to have provided details or current housing stock by each planning authority and indeed to have provided both housing stock and population data for current and growth. The estimated population webelieve is:- Central London: 0.2mill, Inner London: 3.8 mill and Outer London: 5.1 mill making a London-wide total of 9.1 mill.

Figure 4.1 of the draft London Plan shows the targets for each borough on a map of wider-London. We have annotated the map by adding the local authority names and housing targets for all 35 authorities and we include it here as Annex 2. We have not imposed the 54 dBLAeq contour onto Figure 4.1 but boroughs such as Hounslow, Ealing, Richmond and Wandsworth are affected. The Buzzard and Brookmans Park flight departure routes on Easterlies head in a north easterly direction as shown by Annex 3 and are over authorities with some of the largest ten year housing increases such as Hounslow (22k), Ealing (28k), Brent (29k) and Barnet (31k).

Annex 4 shows the arrivals on westerlies over east London, which the map in Annex 2 shows as having some of the largest ten year housing increases e.g. Tower Hamlets 35k, Newham 38k and Greenwich 32k.

Weare not clear fromreading the draft London Plan whether Heathrow expansion is taken into account by the projected housing needs - we think probably not. The following table shows the housing needs of Heathrow expansion, as projected by the Airports Commission (Local Economy Impacts: Assessment Table4 page 8) . The Commission recognised that providing the number of houses required could be challenging. It also notes that infrastructure such as schools would be required as well. This additional demand would be faced in particular by Hounslow, Ealing, Slough and Spelthorne local authorities.

Number of Additional Houses for Additional Employees - Heathrow NWR expansion		
	Low	High
Direct Employees	11,000	26,000
Total employees (direct, indirect & induced)	29,800	70,800

Heathrow is in London’s greenbelt and it is not clear that there is sufficient land to support the new housing and commercial demand that would arise with Heathrow expansion. Already the land values are high, partly due to the generally high demand around London but particularly because of the presence of Heathrow.

While an increase in London’s population is a foregone conclusion the quantum is less certain and we believe a number of local authorities are pushing back against the allocated housing increases not least because they do not have suitable land. It is not clear to what extent the ICAO Land-use Planning is being taken into account in current local authority assessments but it should be in many cases.

The local authorities surrounding London also have sizable housing demands. It would help if the draft London Plan could have considered the housing pressures on London's periphery. As far as Heathrow and its flight paths are concerned these surrounding boroughs are very much part of the area exposed to additional flights and housing demand.

Communities are completely in the dark on the re-design of flight paths tomodernise the air space and to service the expansion of Heathrow. Weunderstand definitive proposals will notbe made for two or three years.

The housing and flight path issues are not just relevant to expansion of Heathrow but also to the modernisation of airspace now under way.

We conclude that a significant number of additional houses is needed and the draft London Plan indicates the allocation across London. We believe many of the additional residents will experience significant levels of aircraft noise. This matter needs to be given much greater attention in the London Plan. The ICAO Land-use Planning process is not capable of resolving the problemand it needs to be reassessed as to its meaningful role in siting of new housing. The matter needs to be addressed before Heathrow is granted planning permission to expand. The design of flight paths needs to be accelerated to run in parallel with decisions on housing.

Given the intractable problem of housing and aircraft noise we believe serious consideration should be given to not expanding Heathrow.

Until these matters are resolved London will suffer significant blight fromthe uncertainity of where to build houses and where will future flight paths be directed.

User: Member of Parliament for Croydon South

The removal of targets for family homes.
The New London Plan fails to make sufficient provision for new family homes of three and four bedrooms. This is especially concerning in the context of the removal of the 36% family homes target from the draft Housing Strategy. This will result in there being no policy to encourage much needed family homes.

It is vitally important that there is a target for family homes, otherwise developers will be tempted to predominantly build smaller units that are cheaper and do not provide for the communities of tomorrow.

The SHMA methodology should be reviewed in order to ensure that the correct quantities of family housing are being provided. Furthermore, policies that promote two bedroom units as family housing and the use of space standards as a maximum should be resisted.

I am concerned that failing to do this will lead to a significant reduction in the provision of new causing poor living conditions for families.

User:	London Property Alliance

Housing – The Alliance recognises the Mayor’s ambition to deliver more housing. The new targets represent a very significant increase above historic trends. Whilst the Alliance understands the priority for affordable housing to be provided on site, the Plan should be moderated to accept that off-site provision may be acceptable in some circumstances, especially in the CAZ where this leads to a greater quantity/quality of affordable housing being delivered and helps to promote the strategic functions of the CAZ. The role of payments in lieu in some circumstances should also be recognised.

The Alliance is concerned about the approach to review mechanisms, and the risk particularly to commercial development within the CAZ. It is also considered that the approach to tenure split is too prescriptive, particularly for central London boroughs.

User: Oxfordshire County Council

Scale of Housing Provision in the Plan

The draft London Plan provides the framework for development of the capital for the period 2019-2041 but the draft Plan does not commit to a specific overall housing target for the whole Plan period. Policy H1 and Table 4.1 only set Borough housing targets for the first ten years of the plan. The draft Plan identifies a need for 66,000 homes p.a. across London for the plan period and the Borough housing targets for the first 10years would provide a combined total of c.65,000 homes p.a.; a plan review will therefore be necessary before 2029.

The draft Plan does not offer a credible long-term, strategic planning approach – it will create uncertainty about how the required 66,000 homes p.a. will be accommodated after the first ten-year period and there will be added housing pressure on London's hinterland due to the capital's inability to meet its own needs in full. The Plan should be amended to give clarity on longer term housing targets for delivery through Borough local plans.

User: Bovis Homes Limited

In summary, Bovis Homes' representations support the increase in the number of new homes to be delivered in London and considers that the number of units to be provided is a minimum number.

However, Bovis Homes has concerns about the deliverability of the number of new homes, and, whilst recognising that sustainable brownfield land has an important role to play, considers that greater flexibility should be afforded in planning policy terms. To that effect, Bovis Homes considers that the housing crisis in London constitutes 'exceptional circumstances' and that, as such, consideration should be afforded to releasing sustainable Green Belt land to meet identified needs.

In setting this out, Bovis Homes point out the significant need for new family housing which does not accord with the likely type of housing that will be delivered from brownfield land. In addition, Bovis Homes note that all authorities around London recognise that housing needs cannot be met on brownfield alone and that some Green Belt land is required in order to meet needs.

User: Bovis Homes Limited

Housing

This section considers housing provision in Croydon set against targets published within the Draft New London Plan.

Croydon has consistently struggled with a significant shortfall in housing delivery. It is unlikely that the increased housing can be delivered within the existing development boundaries and therefore the next logical step is to release Green Belt land to enable the delivery of these additional homes.

The SHMA (2015) identifies that, as housing targets for LBC have consistently increased in recent years, the levels of delivery have dropped. The SHMA identified that there is a requirement to provide 44,149 new homes in the period up to 2036 (it covers a 23 year period, which equates to circa 1,920 new homes per annum).

The Croydon Local Plan was adopted on 27 February 2018, however, it recognised that even the SHMA figures cannot be met in Croydon as "*There is limited developable land available for residential development within the built up area meaning that it is only possible to plan for 32,890 new homes in the plan period*" (para 4.1 of the 2018 Local Plan). As such, the Local Plan is only planning to meet the previous London Plan figure of 1,430 new homes per annum.

Indeed, it is clear from the Local Plan that Croydon has considered all developable land within the built up area and there is very limited capacity. If the 2018 London Plan seeks to increase the amount of housing in Croydon, alternatives to developing within the built up area will need to be considered.

User:	The Forestry Commission

Chapter 4 Housing

Timber frame construction offers huge future potential to help meet housing demand whilst also contributing to zero carbon, zero waste ambitions. Technologies already available such as Cross Laminated Timber (CLT) enable timber construction and have already been used in London, with scope to do much more. Emerging technical developments that can further increase timber construction opportunities. Increased use of timber in construction provides an opportunity to use UK sustainably produced timber. The use of sustainable timber from London's urban forest can help give new developments and communities a sense of place. This would all support 'good growth' and both the national and London economy.

User: Buckinghamshire District Councils & Bucks Thames Valley Local Enterprise Parthership

Housing and Green Belt

3. We understand, welcome and support the Mayor's ambition to achieve a step-change in housing delivery in London, including affordable housing, in order to meet as much as possible of the needs of London's growing population within the Capital's boundaries. In order to provide longer-term certainty within and beyond the Capital, the London Plan should close fully the gap between the number of homes needed (66,000 a year for at least 20 years) and the supply of land to accommodate them (65,000 a year for the first 10 years of the Plan) by further exploring and exhausting all reasonable options for accommodating housing growth within London.

4. One such option is a comprehensive and fully justified review of the Green Belt within London. Given the planned shortfall between housing need and supply in London over the next 10 years and the Plan's acknowledged uncertainty about London's longer-term approach to housing capacity, it is not acceptable that the London Plan has failed to explore in full what scope there might be to release Green Belt in sustainable locations within London in order to accommodate housing and employment needs.

User: Conservative Councillor for Sanderstead Ward, LB Croydon

The removal of protection for back gardens.

The existing policy 3.5 has been successful in protecting much garden land from development. It would, therefore, be a retrograde step to now remove that protection. The loss of back gardens has a huge impact on biodiversity and local character and flies in the face of the NPPF.

Policy 3.5 should, therefore, be reinstated to maintain the current level of protection for back gardens.

User:	Argent (Property Development) Services LLP

Argent supports the objectives of the plan, particularly the required step change in delivery of housing and support for continued job growth, including in Opportunity Areas (OAs). However, the plan’s objectives needs to be deliverable and it is important that once adopted, the plan does not over burden those wanting to take forward high quality regeneration with lasting benefits.

User: North London Waste Authority

- NLWA has no specific comment to make about this chapter- except to reiterate that CIL should be available to support waste infrastructure which we regard as essential community infrastructure, equally as necessary as schools or roads for example.
- We have also made comments elsewhere in this response about the requirement for new developments to incorporate sufficient storage space for residents to store recyclables both within individual properties and at communal spaces, and the importance of planners and developers being required to adhere to these requirements (i.e. not trading the waste and recycling requirements off against others when resources are tight).

User: Kesslers Stratford Limited

Kesslers are in agreement with many of the sentiments of the Draft London Plan, not least with the strong need to support a step change in delivery of housing and new workspaces within the Plan period. However the maximisation of regeneration benefits of mixed use development sites to their locality and to London will require a trade-off between some of the policy objectives of the Draft London Plan in order to achieve commercial viability and deliverability. This is the essence of the representations made, which are in 2 categories; Principal Issues and Other Issues.

User: Wells House Road Residents

Wells House Road Residents Association supports these papers and would also like to suggest that before the ambitious housing quotas are agreed:

- Hammersmith Society
- Ealing Matters
- Neighbourhood Forums across London
- Old Oak Neighbourhood Forum
- 2 x Just Space Comments

Wells House Road Residents Association supports these papers and would also like to suggest that before the ambitious housing quotas are agreed:

1. That the Mayor introduces laws to outlaw landlords of empty homes
2. That the Mayor encourages the de-commoditisation of housing as an investment. Homes should be built as homes and not for profit
3. That the housing quotas are reviewed in light of the exodus of EU nationals from the capital
4. That a cap is put on student housing that is taking the space needed from mixed use housing
5. That councils such as Ealing are penalised for their poor housing development standards and the poor quality of their planners and planning strategy. See the article from Get West London and the attached spreadsheet of planning applications that shows the shocking housing density of plans for 12000 residents living in 10 hectares next to the polluted A40 https://www.getwestlondon.co.uk/news/west-london-news/controversial-plans-build-three-high-14324680

User:	Central Bedfordshire

Thank you for consulting Central Bedfordshire Council (CBC), we welcome the opportunity to comment on the Draft London Plan. Overall, the Council is supportive of the Draft London Plan and its commitment to meet much of London's identified housing needs within the Greater London administrative area. However, we do have some concerns regarding uncertainties arising from housing provision which are set out below. We hope you will find these comments helpful and supportive.

User: Central Bedfordshire

Housing need and supply

The Draft Plan identifies a housing need of approximately 66,000 additional homes a year within London. However, the supporting Strategic Housing Land Availability Assessment suggests that London only has capacity for approximately 65,000 additional homes a year. This results in a deficit of 1,000 homes a year which are unaccounted for in the Draft Plan. Whilst we welcome the commitment set out in the Draft Plan that states "….as far as possible sufficient provision will be made to accommodate the projected growth within London….", we are concerned that the Draft Plan doesn't specifically acknowledge this shortfall, nor does it set out how this will be addressed. Under delivery against London Plan targets has been an ongoing issue in recent years, with no apparent solution to the acknowledged deficit identified. On this basis, we suggest the Draft Plan is amended firstly to clarify how the 1,000 homes per year deficit will be accommodated, and secondly what contingencies have been identified should the housing target not be met, and subsequently how any resulting unmet needs will be addressed.

User:	Defend the Whittington Hospital Coalition

- **Step-down care -** Experts consider that it is bad value for money for the government to sell NHS land for private house-building when such land, much of it co-located with hospitals, or in their vicinity could be used for “step-down” care to relieve acute beds.

User: Petts Wood & District Residents' Association

The designation of a large proportion of Petts Wood as an ASRC serves to be ‘undone’ by the lack of reference to these in the DNLP. There are some bland references to ‘character’ but these are vague.

Indeed, little protection is afforded to such areas in the light of amended housing targets which, for Bromley Borough, will increase from 641 additional homes per annum to 1424 (see Table 4.1 10-year target for net housing completions 2019/20-2028/29, page 146). This represents a 120% increase and has the potential to change our area forever. The very reason why people/Londoners choose to live in the London Borough of Bromley is for its wide open spaces, large spacious gardens and extensive Green Belt areas affording unrivalled opportunities for recreational activities.

Indeed, PWDRA would like to see a much greater emphasis within the DNLP on protected land, such as Conservation Areas/Areas of Special Residential Character, rather than bland statements about ‘character’.

User:	Landscape Institute London

LI London strongly suggest that there is a need to consider densification by mid-rise and terraced streets in preference to high-rise (Create Streets), as well as changes to the matrix for measuring, and whether building in suburban gardens will reduce the amount of publicly accessible open and green space.

User: Culverley Green Residents' Association

Intensification

Although the general thrust of making the best use of vacant or underused land is laudable the wording and justifications of various policies make it clear that there is a presumption in favour of development anywhere and everywhere, including the curtilages of existing housing, which can only be to the detriment of the environment, the living quality of existing and new residents and of the open gardens and wildlife of many areas of London. Many people like living in parts of London which have distinct characteristics or indeed in the suburbs because of their architecture or open character, plethora of trees or open spaces, you have written a Town Cramming charter which will only serve to drive more and more of the economically active to live in the Home Counties and beyond which will be to the detriment of the vitality of London as a whole. The justification to Policy H2 in paras 4.2.5 onwards will be used by developers as a stick to beat all LPAs and to justify extremely high density, unaffordable rubbish housing which is unlikely to appeal to anyone but an investor and will not meet housing need at all. LA housing waiting lists are dominated by families, yet the mix advocated by the London Plan is for predominantly small units on the premise that larger units are occupied by people who share!! If you are aiming to get a better share of affordable housing procured in the next 10 to 15 years how is this going to satisfy the real housing need as demonstrated by LA waiting lists or encourage the economically active who have children to stay in London and contribute to society if you allow all developers to get away with high density high rise one bed flats whose only open space is a green or brown roof.

User: Essex County Council

London’s housing need and ability to meet its requirement

- Policy GG4: Delivering the Homes Londoners Need
- Policy H1: Increasing housing supply (and supporting text)
- Policy H2: Small sites (and supporting text)
- Policy H3: Monitoring housing Targets (and supporting text)

The County Council supports the commitment in the Draft London Plan to meet the vast majority of London’s housing needs within London. However, there is concern, and clarification is sought on:

- the scale of housing need in the period to 2029 (it appears to be substantively greater than that averaged out over the period to 2041);
- the proactive proposals to plan within London’s boundaries for the 1,000 homes per annum identified as the difference between housing need and housing land supply (66,000 dpa vs 65,000 dpa); and
- how any housing delivery failure will be managed within London and whether this would necessitate a full review of the Plan, along with a commitment to how such a review would be triggered.

The County Council refers the Mayor to the EELGA response to the Draft London Plan, which contains further details on these housing matters and a technical note on London’s housing requirement evidence base. Specific points this County Council wishes to highlight are included below.

Housing land supply vs housing need and housing delivery

There are no indications of effective monitoring frameworks which will ensure that the Mayor delivers on his housing ambition as well as the supporting infrastructure. With the right monitoring frameworks and appropriate policy wording to set out appropriate contingencies/actions in the event that delivery falls short of policy requirements, the Mayor would be able to demonstrate how London is progressing on its ambitions and avoid the risk of unintended and unplanned pushing of London residents into the WSE and beyond.

The County Council seeks confirmation within the new London Plan (both policy and supporting text) that any housing delivery failure is a matter for London and would be dealt with by means of a review of the Plan. There may also be merit in calling for the new Plan to include a trigger point for a review for example, a specific number of years of failure or cumulative under delivery percentage. This would demonstrate how London is progressing on its ambitions and avoid the risk of unintended and unplanned consequences beyond London.

The Draft London Plan identifies land for a housing supply of 65,000 dpa compared to a housing need of 66,000 dpa, resulting in a shortfall of 1,000 dpa. Whilst the County Council supports the Mayor's commitment to meet 65,000 dpa of identified housing need within London's boundaries, clarification is sought on the proactive proposals to plan for the 1,000 dpa undersupply within London's boundaries.

The current London Plan, which failed to proactively plan for the level of identified need (but in that case the gap is 7,000 dpa) contains policy wording that seeks to encourage London Boroughs to exceed their specific housing targets to make inroads into managing the 7,000 dpa shortfall between 'need for' and 'plan for' ('Boroughs should draw on the housing benchmarks in table 3.1 in developing their LDF housing targets, augmented where possible with extra housing capacity to close the gap between identified housing need…..'). The Draft London Plan contains no such wording and therefore there is no clarity on the position in relation to the 'missing 1,000 dpa' and how this will be accommodated within London's boundaries or otherwise. The position on this matter needs to be clarified in the new Plan.

There would clearly be a range of potential serious consequences if housing delivery within London continues to fail – both within and beyond the capital (exacerbating the tendency to migrate, increasing commuting, increasing migration assumptions within official population projections, etc.). Given the scale of the challenge ahead it would seem prudent for the GLA to plan for the possibility of failure and the Draft London Plan is not as clear as it might be in terms of what would happen were failure to materialise. A clearer link in the Plan to the Mayor's Housing Strategy and the relationship between the two documents may further assist in providing clarity and assurances that these two documents combined, together with concerted effort of all partners, achieves the Mayor's desired housing delivery uplift.

The Mayor's policy with respect to the Green Belt is considered to impact negatively on London's ability to achieve its aspiration of delivering the identified 65,000 dpa, particularly at a time when a number of Essex councils have had to make tough decisions to release Green Belt in order to meet objectively assessed needs.

Affordable homes

The London Plan must ensure that the required range and mix of private and affordable housing is delivered within London. London boroughs should be required to deliver affordable homes within their area to avoid the relocation of people into Essex and to prevent inevitable additional strains on resources from already stretched public services, as has been the experience in several Essex local authoties. The Mayor should also do all he can to ensure that London boroughs do not inappropriately discharge their homelessness obligations by placing people in Essex without the right levels of support and care.

User:	Ballymore Group

Ballymore strongly supports the recognition within the new London Plan of the need for additional homes across London. They recognise that initiatives such as optimising housing density through a design-led approach, the promotion of one and two beds in more central or urban locations and the co-location of residential and industrial uses on industrial sites through plan-led intensification have the potential to be very positive in contributing towards this increased housing supply.

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User: Member of Parliament James Brokenshire

The Plan should seek to deliver housing growth in a sustainable way and with a sense of community and identity and belonging to a particular area. I fear that the Plan will not deliver this and risks remaking some of the mistakes of the past with its seemingly rigid encouragement of high rise units and very dense development in a way which does not have regard for the social infrastructure needed to support such communities (such as schools, transport, hospitals etc). If implemented in its current form, many outer London areas will look fundamentally different to how they do now.

My underlying concerns relate to: the assumptions of the Strategic Housing Market Assessment underpinning the plan (including the size and nature of units required); how the type and nature of housing prescribed by the Plan meets need; the need to maintain or establish sustainable communities with a sense of identity, place and belonging; the potential impact on parkland which does not currently have greenbelt or other suitable designation, the rigidity and prescriptive nature of the Plan; and the emphasis on small site development and back garden development over appropriate brownfield industrial land.

The extent of the emphasis on small units (largely one or two bedroom flats) rather than a balanced mix of family units with adult children being separated as a result of the lack of suitable larger accommodation.

User:	Chairs of Camden's Conservation Area Advisory Committees

Chapter 4 Housing
General: We acknowledge the very serious nature of the housing crisis in London, and welcome effective proposals to address it. We would seek to contribute to a plan which would address the problem by establishing means by which communities would welcome new housing, rather than oppose it. We fear that the Draft Plan increases opportunities for conflict, thereby decreasing the likelihood of effective implementation within a reasonable timescale. We, again, see working collaboratively with communities, and respecting local distinctiveness and heritage assets as key to successful implementation.

User:	Natural England

As a high-level spatial Plan, the London Plan sets Borough-level housing targets but does not allocate specific sites. It is therefore appropriate for the HRA to assess only the scope for impacts which may arise directly or indirectly as a result of those broad housing targets which could not otherwise be adequately mitigated for through local spatial development and development management policy. As such, Natural England is in general agreement with the conclusions of the HRA, however we have a few specific concerns which we would like to see addressed.

User: CIBSE

How best to meet overall housing needs is not within CIBSE's core area of expertise; we are focussed on delivering, operating and maintaining the homes to meet those needs to a high standard.

As a professional institution we would however note that we are very aware of the difficulty to access housing of appropriate quality and costs in London; the building services engineering professions and the wider construction sector have to compete with other industries in attracting and retaining talented, skilled and creative workers. We would welcome measures to ensure that housing costs and availability do not contribute to further skill shortages in the sector.

User: BEE Midtown

We welcome the Mayor’s proposals to remove the density cap. Midtown agree that a key way in which housing shortages could be addressed is via the relaxation of planning regulations which restrict the height of new buildings. With land space being increasingly scarce, building taller housing blocks provides an effective solution to the lack of sites in places such as Camden and Islington.

At present, planning regulations surrounding the height and density of building in the area are stifling commercial growth. This is a particular issue in the Farringdon and St Paul’s area, where buildings have the additional burden of having to comply with protected views guidelines. We believe that these regulations should be reviewed in line with London’s fastchanging built environment requirements.

User:	Countryside Properties PLC

Home Builders Federation's Analysis

The HBF uses the Government's analysis as the basis for a different conclusion on housing need. Its representations to the draft London Plan cite a rationale for why the Objectively Assessed Need for London should be the *'uncapped requirement'* of 92,000 homes per annum (rounded for *'the purposes of plan-making'*).

Summary of Housing Need

All in all, taken on face value the Draft London Plan does not identify sufficient supply to meet identified need. The Government's proposed standardised methodology and analysis by the HBF both indicate that need is significantly higher.

User: Councillor for Coulsden East Ward, LB Croydon

An increase in housing targets.

The newly proposed annualised housing target of 64,935 homes per year across London, has led to a dramatic increase in the 10 year housing targets. Croydon's 10 year target has been increased from 14348 to 29490. In comparison neighbouring Bromley have been increased from 6413 to 14240 and neighbouring Sutton from 3626 to 9390. Croydon have just had their housing targets assessed as part of the examination in public of the Croydon Local Plan. These targets have been subject to the latest scrutiny and found to be sound by the Planning Inspector. These are the targets that should, therefore, be incorporated in to the New London Plan.

Croydon has also been achieving challenging targets in housing supply for many years now. The availability of brownfield sites is becoming much more difficult. Other boroughs have not produced anywhere near the same quantity of housing as Croydon, and perhaps it is time for those boroughs to step up to the plate.

Once again the methodology behind the SHMA appears to be unsound and should be re-examined to ensure that appropriate targets are being set.

In conclusion Mr Mayor I would urge you to re-consider the policy areas that have been outlined, otherwise the proposed policy changes will encourage the loss of existing family housing and its replacement with blocks of flats with little or no parking provision, causing a huge impact in existing character.

User:	Landsec

Chapter 4 – Housing

We welcome the Plan’s aspirations for facilitating a step change in the delivery of homes for London. The increase in target numbers however is significant increase from historic rates of delivery. Landsec is a significant owner of land in London which may be capable of providing new homes, and has a successful track record of delivering mixed use schemes in London such as our Nova scheme in Victoria.

User: Cllr Richard Chatterjee

The removal of protection for back gardens

The existing policy 3.5 has been successful in protecting much garden land from development. It would, therefore, be a retrograde step to now remove that protection. The loss of back gardens has a huge impact on biodiversity and local character and flies in the face of the NPPF.

Policy 3.5 should, therefore, be reinstated to maintain the current level of protection for back gardens.

User: Mr Gary Hayes

Additional Policy – Co-operative / community led housing.

We propose that the Mayor should

(i) work with existing, newly formed or developing London-based co-operatives, TMOs and CLTs to assess their existing and future potential (including resources and capacity) to develop new social / low-cost rented homes;

(ii) with the boroughs, identify and set aside public land that might be available to them to deliver community led housing;

(iii) with the boroughs, develop a London-wide list / online map of potential small development sites to match co-operatives / community led housing organisations with available development sites (particularly public land) for homes that will remain in perpetuity at costs that can be afforded by households of below median income levels;

(iv) provide support social housing tenants who wish to manage or collectively own their own homes.

User: Cllr Richard Chatterjee

The removal of targets for family homes

The New London Plan fails to make sufficient provision for new family homes of three and four bedrooms. This is especially concerning in the context of the removal of the 36% family homes target from the draft Housing Strategy. This will result in there being no policy to encourage family homes.

It is vitally important that there is a target for family homes, otherwise developers will be tempted to predominantly build smaller units that are cheaper and do not provide for communities of tomorrow.

The SHMA methodology should be reviewed in order to ensure that the correct quantities of family housing are being provided. Furthermore, policies that promote two bedroom units as family housing and the use of space standards as a maximum should be resisted, otherwise there will be a dramatic reduction in the production of family homes which will ultimately lead to poor living conditions for future families.

User:	Sir Simon Hughes

Maximum amounts of prefabricated modular housing should be used on temporary and permanent sites.

User: Andrea Carey Fuller

Additional Policy – Co-operative / community led housing.

We propose that the Mayor should

1. work with existing, newly formed or developing London-based co-operatives, TMOs and CLTs to assess their existing and future potential (including resources and capacity) to develop new social / low-cost rented homes;
2. with the boroughs, identify and set aside public land that might be available to them to deliver community led housing;
3. with the boroughs, develop a London-wide list / online map of potential small development sites to match co-operatives / community led housing organisations with available development sites (particularly public land) for homes that will remain in perpetuity at costs that can be afforded by households of below median income levels;
4. provide support social housing tenants who wish to manage or collectively own their own homes.

User: Mill Hill Neighbourhood Forum

We understand the current view that there is a significant housing shortage both in London and across the UK, but we question whether relaxing sound planning principles is the correct solution? We see reviews that suggest that there are 900,000+ empty homes across the UK of which 330,000 are long-term empty. More than 400,000 homes have been granted permission but are still waiting to be built, according to analysis published by the Local Government Association (LGA) – a rise of 16 per cent in the past year. Within our area we have the Mill Hill East Area Action plan which called for 2150 new homes in 2012 but the developers say it will be 2026 before the site is fully built out!

An analysis of Brownfield Land Registers, published on 12th February 2018, confirms that there is enough space on brownfield land to build at least one million new homes, with more than twothirds of these homes deliverable within the next five years. [1] Many of these sites are in areas with a high need for housing. This means that three of the next five years' worth of Government housing targets could be met through building homes on brownfield land that has already been identified, easing pressures on councils to continue releasing greenfield land unnecessarily and preventing the unnecessary loss of countryside.

In view if the above we think that measures should be taken to get empty properties into use.For example, many landlords consider under current legislation, that it is too risky to take on tenants who are on benefits. This is a direct result of housing benefits being paid to tenants rather than landlords directly. This was the consequence of a change in legislation that was not thought through. Developers are deliberately land-banking and will continue to do so as you make it easier for them to get planning approvals; they will not build more houses without much encouragement. It should be possible when allowing planning permission to not only put a date by when building must start but also one by which time the site must be built. The other
consequence of it taking a long time to complete developments is that early residents and all those who surround it are living with noise, dust, and construction traffic and the too slow provision of infrastructure agreed to be supplied under S106 conditions.

We do not see anything in your new DLP that addresses these very real issues, which could deliver more homes much more quickly than any other measures you have proposed.

User: Kent Leaders

The London Plan must ensure that the required range and mix of private and affordable housing is delivered within the boundaries of London. London boroughs should be required to deliver affordable homes within a reasonable vicinity of their area to avoid significant relocation into Kent and to prevent inevitable additional strains on resources from already stretched public services.

There is a potential risk that with the ambitious housing targets for the outer boroughs and the refusal to assess the functioning of the inner boundary of the Green Belt, London may not be able to meet all of its needs within its boundaries. This could result in unmet needs. It is highly questionable whether the housing markets outside London will have the capacity to deliver not just a boost in supply arising from current need assessments prepared by the districts, but any additional housing to help meet London's projected needs. This is a concern not just in terms of the availability of deliverable sites – taking account of constraints such as the Green Belt and Areas of Outstanding Natural Beauty – but also in terms of what the local markets can realistically support. This is a genuine concern, particularly given the current uncertain economic climate.

The scale of growth across the Wider South East is significant. With an increasing focus on the Northern Powerhouse to invest and develop in industries in the north of England, there needs to be renewed focus on the industries in the South East, to ensure that they remain competitive against the investment in the North. Kent Leaders strongly advocate the need for much more positive inter-regional planning, where London is seen as an integral part of the Wider South East, to relieve pressure on the South East.

Further clarity is required on how you will deliver your aim of meeting London's need within its boundary and how the annual 1,000 homes gap will be tackled. Kent Leaders would expect to see a clear and robust mechanism incorporated into the London Plan to ensure that if housing delivery targets are not being met, actions are triggered to ensure that any surplus housing needing to be accommodated outside the London boundary is supported by the additional supporting services and infrastructure.

User: Wimbledon East Hillside Residents' Association

Another big concern is the view on housing, and especially housing that ordinary people require. This is a tremendous problem now, and a dilemma to you all, because you look at the problem from only one perspective: making more growth for London; making more money for London.

London has grown from small villages and over time, the villages merged to become London. The 'village' aspect is the real reason London thrives, not the fact that is a 'big city' but that it is a highly complex organism of long, rich and deep heritage, diversity and character. To try to 'improve' this for the next generation by laying blanket 'rules' over the city and greater London you will suffocate the very air that makes London so appealing.

At the NLA Yolande Barnes talked about how ***'(the draft plan) does make sense if you see this Plan as an attempt to start urbanising the suburbs.'*** The entire premise lies on a conditional: **IF** YOU SEE THE PLAN as urbanising the suburbs. It is these suburbs real people wish to live in; we do not want to live in central London, and the suggestion greater London communities will become more and more like London, with taller buildings, more density and less public open space is absurd.

The housing target is set at an ambitious 66,000 a year, and yet no-one has been able to achieve anything like. The housing target set for our area of Merton is a massive 13,280, and one of the highest in all London. This is far too high for our area, and there are no clever ideas or advice to hand, for how this might be achieved, without great loss to our treasured green spaces or by building on already badly polluted if dated industrial land that is going to be very difficult to 'clean up' let alone be able to live on. The goals must be removed or revised to respect the precise communities where such ambitious new housing would be suitable (if there are any!). Maybe Merton should build an outpost in Cornwall, and build a 'province' where housing is readily available, and move some of those needing housing out there.

User: Wimbledon East Hillside Residents' Association

We do need planning laws changed. We need express permission to b allow some experimentation with different, more socially suited housing models. (Traffic & Highways have experimental orders; planning should have the same.)

For example, might the student housing formats be able to be built, for young singles, or couples? The co-living model is taking off, but our borough is ignorant of this, and won't make exceptions in planning decisions, even though they break many other planning rules as and when it suits them. What about innovations such as OWCH (older women' communal housing) that can not only provide brilliant housing, it solves other social problems such as elder care, mental health problems caused by loneliness and so on. The plan must include hearty encouragement for developers and smaller companies to use their creative energy to try new, hopefully better solutions to these very basic problems.

User: Ealing Fields Residents Association

CONVERSIONS AND THE PRESERVATION OF FAMILY ACCOMMODATION

We note that many London Local Plans fail to include provisions which are intended to preserve family accommodation.

This is a particular problem for neighbourhoods which currently have a high proportion of family accommodation and also benefit from an established local family infrastructure such as schools, GP's and libraries.

A consequence of this local policy omission is that the loss of family accommodation is unlikely to be a considered a material consideration when Local Planning Authorities consider proposals to subdivide modest sized family housing into small multiple dwellings.

The absence of such provisions, coupled with the emphasis on increasing the number of housing units, means that there is likely to be an accelerated loss of family sized homes over the lifetime of the Draft New London Plan.

While many London Local Plans fail to address this issue, we note that some Local Planning Authorities have introduced policies which address the loss of family homes due to conversions.

We draw attention to the policy contained in Hammersmith & Fulham's very recently adopted Local Plan and the policy contained in Hounslow's Local Plan.

Both policies are designed to ensure that a minimum quantum of family accommodation is retained in any house which is converted into multiple units.

Copies of both policies are appended to this consultation response. The web links to them are as follows:

https://www.lbhf.gov.uk/planning/planning-policy/local-plan
https://www.hounslow.gov.uk/info/20167/local_plan/1108/local_plan

We therefore request that the Draft New London Plan is modified to include either:

? An explicit policy along the lines of the recently adopted attached Hammersmith & Fulham policy, or

? A statement in the accompanying narrative which explicitly addresses the risks associated with the loss of family accommodation due to conversions and which also strongly encourages Local Planning Authorities to urgently bring forward policies which address this problem.

User: National Custom and Self Build Association

Key messages

NaCSBA believes that The New London Plan can go further in supporting delivery of new homes through custom and self build, providing valuable guidance for local authorities in relation to their duties under The Right to Build legislation. Despite strong public support, custom and self build has become harder in London in recent years.

On 1 November 2017 NaCSBA used the Freedom of Information Act to establish the number of individuals and groups of individuals registered under the Right to Build across the 32 London Boroughs and the City of London. Under their legal duties established in Right to Build legislation planning authorities must grant permission for 6,000 serviced plots (including new dwellings formed through first time conversion) by 31 October 2020. The solution is not just more small sites, it is the more effective subdivision of larger sites.

NaCSBA's research indicates that demand for custom and self build housing is considerably greater than indicated by the Right to Build Registers and in accordance with the National Planning Policy Framework and Planning Practice Guidance, The New London Plan should highlight the need to assess demand using a number of other sources to provide a robust evidence base for plan making and the allocation of sites.

NaCSBA strongly supports the emphasis on the delivery of affordable homes in The New London Plan. NaCSBA proposes that recognition be given to the role of custom and self build as a route to delivering genuinely affordable new homes across a range of tenures. The New London Plan is a further opportunity to clarify that the delivery of affordable homes on serviced plots counts towards their Right to Build total.

Given the Right to Build, NaCSBA would welcome the resurrection of the Build Your Own Home – The London Way to provide specific funding in support of custom and self build aligned to the New London Plan.

User: Highams Park Planning Group

HOUSING DEVELOPMENT & AFFORDABILITY (HDA)

Development in Highams Park shall provide a range of locally specific housing appropriate for all sections of the community, including affordable housing (Objective 5).

Highams Park's mix of home types is limiting the ability of the Area to support a good mixed future community. Recent census data shows that the proportion of young people of family forming age is rapidly falling and those about to enter retirement age is set to rapidly rise (see figs 4 & 5 below). GLA ward based population projections suggest a 50% increase in the population aged 66 and over between 2015 and 2033 in the Area. This Plan seeks to address this with policies that focus our limited development site availability on new-build provision for local downsizers and locally connected first-time buyers and for families.

For many of the Area's young people there is a serious issue with affordability, with many being forced to leave the Area due to the high entry cost of the local housing market. To help address this, the Plan supports LBWF's policy CS2 for 50% of new homes to be affordable. The definition of local affordability is contained in Appendix 5.

To help resolve this issue many councils now apply a local connection test for applicants who wish to buy an affordable home. The Plan believes this approach will assist young people to remain in the Area and, therefore, has included a local connection test in Policy HDA1 which the first occupiers of affordable homes built in the Plan Area will be required to satisfy.

GLA ward based population density projections suggest increasing population density across the Area during the lifetime of the Plan. Given the very limited capacity for additional development on the Area, this suggests increasing household size is likely to be a factor. Development of new homes outside HPDC should be focussed on addressing the need to provide larger family homes of three and four bedrooms.

For those approaching retirement, there are few suitable properties which might allow people to ‘downsize’ to smaller more manageable property, whilst remaining close to friends and local amenities. This in turn means there is a considerable proportion of under-utilised family homes in the Area. To help address this the Plan will support proposals for new homes specifically catering for older residents seeking to downsize, but remain within the Area. Such homes might well be larger than minimum standards and offer additional features to encourage them to downsize from their current larger, often well-appointed, homes.

User: Socialist Health Association London

Chapter 4 Housing

We feel that this issue is so important that we repeat the same information under different headings to ensure this is not lost in any form of silo discussions which may ensue :

The London Plan must reject the uninformed use of NHS sites for housing as proposed in the Government's Naylor Report – but instead take on board the specific tests for constructive and sustainable use that we have included in this paper.

The Naylor report recommends that up to £5.7bn of NHS sites (the most valuable being in London) be sold and much of the space used for new housing development.

However the proposals represent what amounts to a potentially scandalous firesale of precious NHS property and sites. The definition of 'underused' (set out in the Carter report on efficiency) is based on a meaningless measure – such that, for instance, laboratory space or play space for children can result in a building being designated 'inefficient' and categorised for sale. Most importantly, the sale of NHS estate is **proposed in the complete absence of any national or local NHS estate strategy**.

Local authorities are encouraged to support the sale of NHS land through the promise of land for housing. The London Plan must take on board informed planning with respect to use of NHS land instead of falling into the trap of a wholesale sell off.

The umbrella group Health Campaigns Together (HCT), which includes a range of organisation and campaign groups with specialists in the field of land use have proposed the following strategy for use of NHS land. We hope this approach will be adopted within the London Plan.

We ask for the following sensible and sustainable uses of NHS land :

Any NHS land that is not in clinical use at present should be used for health and wellbeing purposes, to be considered in priority order, as follows:

1. The NHS should consult fully and agree plans with local people. It should identify any land that may be required for expansion or rebuilding of existing hospitals or clinics, or needed for publicly-provided shared health and social care. This land cannot be sold.

2. The NHS should build “step-down care” and rehabilitation centres to care temporarily for the 6,000 patients who are medically fit, but still need care and are occupying expensive acute care beds. Figures show that this would pay for itself in only one or two years, and is far better value for money than selling land.

3. Land not needed for NHS care should be considered for publicly-provided social care, or used to build low rent housing for NHS employees. This would improve recruitment, reduce length of journeys to work, and reduce fatigue for NHS staff, so improving patient safety, and releasing the housing presently occupied by the rehoused staff.

4. Publicly-owned supported accommodation for elderly and vulnerable people should be developed on remaining NHS land, near to medical facilities, to meet the acute need for such homes. This would also free up housing occupied by vulnerable people for use by others.

5. Any remaining NHS sites should be used for social housing, provided at genuinely affordable rents. The destructive “right-to-buy” policy that has depleted the affordable public housing stock since the Thatcher era should not apply, and in any case should be abolished by legislation.

6. Any NHS land that is not suitable for the purposes above should be included in a local public land bank, to be considered for land swaps under the direction of the local planning authorities to improve the quality and allocation of public land.

Only after full consideration of all these uses (in priority order) should NHS land be released for commercial sale. All money from sales should be paid into NHS capital accounts and used for buildings and maintenance, not to compensate for NHS revenue underfunding.

>> We recommend that all sales of NHS land are halted until national and local estate strategies are agreed with public consultation and Parliamentary debate.

User: Aitch Group

The social, economic and environmental consequences of not meeting the housing crisis should be clearly set out in the London Plan - The Draft London Plan does not set minimum housing targets sufficient to meet housing need, it is reliant on unreliable sources of supply and current delivery rates do not provide confidence that the housing targets proposed can be achieved.

The Mayor of London's most recent London Annual Monitoring Report 2015/16 (AMR no. 13) (July 2017) reveals that the current delivery rates fall far below current targets. Moreover, current delivery rates across London are roughly half of the draft London Plan's 64,935 homes target.

As the Draft London Plan recognises, there is already a 'housing crisis'. The Draft London Plan should contain an authoritative explanation for this, not just in terms of its origins but in terms of the implications if it is not addressed. This could be described as a 'Bad Growth' scenario. As it stands, the Draft London Plan fails to explore and explain these consequences.

User: Aitch Group

Housing Delivery & Location - Bexley

Bexley's Housing Target in the draft London Plan has seen an almost three-fold increase for new dwellings from 4,457 (446 per annum) to 12,450 (1,245 per annum). The Council's Growth Strategy identifies a need for 1,050 new dwellings per annum and therefore acknowledges a significant increase in housing demand and need.

Location of Good Growth in Bexley

The disparity between the draft London Plan and the Growth Strategy is the location for sustainable growth.

As set out within the Bexley Riverside OA, the key areas for growth are Belvedere, Erith, Slade Green and Crayford, however the draft London Plan stipulates that this growth must occur on unprotected, non-designated brownfield sites.

Bexley's Growth Strategy develops the principles and locations for growth as established within the Bexley Riverside OA. Extensive research and technical work has identified suitable sites in Bexley, specifically in these four key areas, to ensure the best use is made of development opportunities in appropriate locations.

User: Meyer Homes

In his recently published Draft Housing Strategy the Mayor made it clear that "*London's housing crisis is the single biggest barrier to prosperity, growth, and fairness facing Londoner's today.*"[1] Meyer Homes concur and welcome the recognition given in the draft London Plan that solving the housing crisis will require a significant increase in the rate of housing of delivery. However, they are concerned that the Draft London Plan does not set out a strategy that will solve the housing crisis and it could make things worse by preventing sites from coming forward. Although the Plan states that it "*marks a break from previous London Plans*", its core strategy is to prioritise brownfield land and optimise development. We agree that this should be supported but we think the Mayor should introduce a more radical approach if the Plan is to be significantly different from previous versions.

Historically the London Plan strategy has consistently failed to meet housing targets[2]. The evidence suggest that the new draft London Plan will not deliver against the significantly increased housing targets. It is noted that when commenting on the relatively minor increase in housing delivery targets introduced by the Further Alterations to the London Plan (FALP) 2015, the Inspector stated:

"The evidence before me strongly suggests that the existing London Plan strategy will not deliver sufficient homes to meet objectively assessed need….In my view, the Mayor needs to explore options beyond the existing philosophy of the London Plan."

Against this context the main points of these representations with respect to the Draft London Plan are as follows:
· The housing delivery targets should be reviewed to ensure that they meet objectively assessed need;
· The 35% threshold approach to viability is too broad and a blanket approach could restrict delivery of much needed housing;
· Threshold approach should be applied flexibility in Opportunity Areas and across different typologies due to market dynamics.
· The Draft London Plan does not set out a strategy that meets housing need as the capacity of small sites has been greatly over estimated and cannot be relied upon to deliver the amount of homes stated.

[1] *Draft London Housing Strategy 2017*
[2] *Source: GLA Annual Monitoring Reports*

User: Unknown

Overall, on the issue of housing, it appears that many London Boroughs are currently just about maintaining a 5YHLS based on adopted London Plan targets, or not at all in the case of Havering as well as neighbouring Barking and Dagenham. The significant increase in housing targets, a failure to allocate additional large strategic sites, infrastructure concerns and a huge reliance on windfall sites not reflective of trends, leads CBRE to the view that the proposed housing targets are woefully unrealistic and will result in a far greater number of Boroughs failing to demonstrate a 5YHLS. CBRE considers that the draft housing policies do not demonstrate compliance with the NPPF.

User:	Abigail Woodman

Policies must be put in place to stop overseas investors buying up homes in London. Homes in London should be bought by people living in London or by people willing to rent to Londoners for a living rent.

User: Mr Peter Shrubb

More generally, where developers do have official permission to build new homes they should be obliged to begin doing so within one year or face severe financial penalties.

- There should also be measures to prevent investors buying homes and then deliberately keeping them empty, thereby increasing the need to build homes elsewhere.
- All rents should be controlled to ensure they are fair both to tenants and landlords. A rent tribunal system should be reintroduced.
- At least 80 per cent of all new homes should be affordable to buy or to rent for people and families on average incomes.
- Finally, popular policies to reduce the size of Britain's population should be introduced.

User: Mr Daniel Willis

d) Housing

Community Links applauds the Mayor's plans to embark upon an ambitious house-building strategy to tackle the current housing crisis. The new Plan's ambitious targets for house-building in Newham, higher than any other Borough, are a recognition of the drastic need for greater provision of affordable homes in our local area. However, our organisation is also concerned at the possibility that housing will not be developed in accordance with the principles of "Good Growth" and will lead to the displacement of low-income and BAME families from Newham. Social homes should be priced at rates affordable to local people. As we have found from conducting research with local organisations such as the Magpie Project in Newham, there is also a need for a greater quantity and quality of temporary accommodation.

Newham has experienced vast redevelopment and regeneration over the past decade; particularly in the Lower Lea Valley, Royal Docks and Beckton Riverside areas set out in the 2011 London Plan. Research has shown that the regeneration of Stratford has displaced low-income families from the area. Furthermore, local residents believe that new developments were deliberately designed to exclude them and attract affluent, incoming residents to the area. Through our community programmes, advice services and research projects, we are now hearing similar concerns from residents about regeneration schemes in Canning Town and Silvertown.

Housing inequality is both a "symptom and a driver" of wider inequalities in London's economy, including health inequalities. Whilst we welcome the Mayor's ambitious strategy, it is crucial that the new Plan's housing offer aims to deliver a more equal society with more affordable housing, without displacing London's diverse communities. Community Links supports calls from My Fair London and the Local Government Association to set "affordable rents" at 30% of household income (rather than 80% of market rent). We endorse the proposals by Just Space that the Plan should explicitly make clear "with reference to housing costs and incomes, [how] the housing needs of households with less than median income levels will be addressed". Furthermore, we call for: longer-term tenancies to provide stability in the Private Rented Sector (PRS); the mandatory licensing of landlords; and a review of housing standard enforcement in the PRS in order to increase the quality of housing.

User: Association of Directors of Public Health

ADPH London agrees with the Housing policy actions to significantly increase the availability and accessibility of affordable housing for Londoners. At the same time, it must be recognised that new higher density and therefore smaller housing may come with inherent problems and risks for the health and wellbeing of residents. We therefore welcome, for example, references (elsewhere in the London Plan) to applying the Healthy Streets approach outlined in the Mayor's Transport Strategy to all areas around new homes, and social infrastructure policies promoting physical activity.

The Mayor has made bold and clear ambitions to reduce air pollution in London. We ask that the Mayor should therefore include in his Housing policy, actions to prevent air pollution generated from construction activities such as the operation of diesel engines, including non-road mobile machinery, and to mitigate noise pollution, as this can contribute to mental ill health, stress levels, hypertension, sleep disturbance and other health issues.

User:	National Grid

We do have some concern regarding housing (chapter 4), specifically on the plans potential to not meet London’s objectively assessed need of 952,670 dwellings (95,267 dpa) and that it only has capacity to deliver 526,000 dwellings (52,650 dpa) over the next 10 years.

User:	Primrose Hill Conservation Area Advisory Committee

General: We acknowledge the very serious nature of the housing crisis in London, and welcome effective proposals to address it. We would seek to contribute to a plan which would address the problem by establishing means by which communities would welcome new housing, rather than oppose it. We fear that the Draft Plan increases opportunities for conflict, thereby decreasing the likelihood of effective implementation within a reasonable timescale. We, again, see working collaboratively with communities, and respecting local distinctiveness and heritage assets as key to successful implementation.

User:	CPRE London

We also believe policies on housing supply should be amended to increase affordable housing provision, avoid excessive densities and prevent the loss of green space as a result of the development of small sites.

Chapter 5 Social Infrastructure

User:	Levitt Bernstein

We have not provided comments on Chapter 5 (Social Infrastructure) but would like to express strong support for the concept of local community hubs; multi-purpose facilities that support multigenerational, multicultural interaction. Such facilities can be a first port of call for those in need of help, advice or information (providing contact details of local charities, organisations and services), provide onsite facilities such as health checks, podiatry, exercise classes, sport, music and dance, safe play, affordable child care, adult day care, after school care, evening classes and coordinate outreach services such as meals-on-wheels and social care. All of this helps to build a sense of community, encourage participation and mutual support, improve health and reduce loneliness.

User: London Legacy Development Corporation

Social infrastructure

LLDC welcomes an enhanced focus on ensuring appropriate levels of social infrastructure to support new developments, especially the new policy on play and informal recreation. This is something we prioritise in all our development, and we are working to improve connectivity in the area through walking and cycling routes. It should be acknowledged that securing delivery of health care facilities can often be difficult given the way in which Clinical Commissioning Groups operate, and there may be benefit in addressing health infrastructure requirements on a wider geographical basis rather than scheme by scheme.

User: London Food LInk /Sustain

We support many of the proposals within this section and are pleased to see that **health provision** is recognised as a vital part of London's social infrastructure.

We believe that food should be more fully considered within the planning of social infrastructure, in the following ways:

- Community food growing spaces should be considered as both part of green and social infrastructure, for their contribution to **community** and **recreation**. There is significant evidence of the social benefits of communal food growing, which is why it needs to be considered in both areas. This includes overcoming isolation and building connections, friendships and important local networks with neighbours.
- Healthy food retail and catering should be considered as social infrastructure. Whilst this is clearer when the provision is led by the community, these initiatives are often more sustainable when run as social enterprises or smaller businesses with community benefit as a primary aim. Encouragement of these initiatives throughout the settings in this chapter would help deliver on the key policies in this plan and other Mayoral priorities, notably those in the Mayor's Health Inequalities strategy.

In addition, for effective provision around dietary health there needs to be adequate planning considerations on the areas below concerning food:

- **In new or refurbished hospitals** - provision of adequate kitchen facilities, including kitchens on every ward allows for fresh food preparation for patients and staff, including communal space for patients to eat together. They should also have access to drinking water.

- **In all healthcare settings, including hospitals, GP practices, and care homes** – consideration should be given for food growing and fresh food retail facilities to benefit patients, staff and visitors[1].

- **Education and childcare facilities** - adequate provision of kitchen, dining, and food growing space, alongside easy access to tap water, are essential to ensure a high standard of health and education of children, staff and families. Many schools and academies lack dining space which can mean children leave schools at lunchtime, leading to a proliferation of outlets selling junk food near schools. This needs to be addressed in news school or academies as well as existing schools and academies, to address the challenge of childhood obesity.
- **Suitable space also needs to be available for breastfeeding**, taking into account need for privacy, safety and access to water, hand-washing and nappy-changing facilities.

[1] There are numerous examples within London and outside of London e.g. University Hospitals Birmingham, where they have leading the way with food growing on hospital grounds with raised beds, poly tunnels and a 140–tree orchard, which contribute produce to fruit and veg stalls, open six days a week, and farmers' market initiatives (in fifth year of trading) at the hospital to improve staff, patient and visitor access to fresh fruit and veg.

FURTHER JUSTIFICATION IN SUSTAIN PDF

User:	Diocese of Southwark

The Diocese of Southwark requests that the Mayor's final plan identifies places of worship, including Christian churches, so recognising that faith is a key component of London's social infrastructure and healthy wellbeing for residents, visitors and those who work in London.

User: London Assembly Green Party Group

It is vitally important that new services and facilities are created alongside new housing at the right time, so that the need to travel is reduced and so that communities grow sustainably with key services and opportunities for work within walking distance.

The overriding push for new housing, and the focus in the draft London Plan on fitting this into existing areas, particularly around town centres, means that solid policies are needed to make sure that other uses of land are not forgotten. Policies also need to make sure that mixed use developments are created in ways that work for everyone.

Chapters 5, 6, and 7 of the draft London Plan seek to do this, providing ways for communities to preserve their sense of place, heritage, and their local businesses and community facilities, while making improvements and adding new homes to their local areas.

I am pleased with many of these policies and their efforts to make the city more inclusive and healthier, and happy that the Healthy Streets principles are further embedded in this section of the draft Plan.

However, I propose some changes, particularly in the way the policies support smaller industrial sites and small businesses, and how they involve local communities.

User:	Mrs Belinda Taylor

Understganding of good fresh food has an impact on health, society, air quality, biodivrsity, the natural environment and climate change by growing it . It should be more fully considered within the planning structure.

User:	Buckinghamshire County Council
Support the aspirations of the policy to deliver the level of appropriate social infrastructure to meet the needs of the communities.	

User:	School Food Matters

Food should be more fully considered within planning social infrastructure.

User:	London Borough of Croydon - Public Health

We support the Social Infrastructure policies (Chapter 5) that outline the need to regularly assess the local need for sport and recreational facilities and the importance of increasing opportunities and accessible provisions for safe play and informal recreation for children and young people.

User:	Kew Society

We support the emphasis on social infrastructure which the pressure to increase housing capacity seems to be squeezing out. Developers should be required to demonstrate how the cumulative impact of their proposal alongside nearby planned developments would be supported by social infrastructure growth.

User:	Mr Oli Perrins
We believe that food should be more fully considered within planning social infrastructure	

User: Wheels for Wellbeing

5.1 As already mentioned, inclusive cycling hubs provide an excellent form of social infrastructure. These can be provided out of a range of pre-existing sporting facilities, such as playing fields, sports arenas, velodromes, leisure centres and indoor sports halls. All disabled Londoners should have access to a local inclusive cycling hub, which will not only help to improve the physical and mental health of local communities, but will also help to reduce social isolation.

5.2 Wheels for Wellbeing is a strong supporter of social prescribing. Through our regular inclusive cycling sessions we offer disabled, older people and people with mental health issues the opportunity to try cycling and enjoy the holistic benefits it has to offer – physically and mentally, as well as socially. Social prescribing should form a routine part of community support across London as it provides a way of reducing pressure on NHS services. As ways of making the most of social prescribing, we would advise that:

- There should be signposting to the fact that disabled people can cycle (including better information about inclusive cycling for GPs, to help inform referrals);
- Funding and resources for social prescriptions be channelled to frontline services, in order to ensure the sustainability of community-based support (i.e. money must follow a person to the frontline, to provide funding so that grassroots organisations can continue running and keep charges to a minimum);
- Every Borough should provide an inclusive cycle hub, offering disabled people an opportunity to discover or rediscover cycling – and reap the many physical, mental health and rehabilitative benefits it has to offer;
- Partnerships be encouraged between inclusive cycling hubs, CCGs, Health and Wellbeing Boards, SEND schools and others so that all disabled, older people and people with mental health issues can be signposted/referred to inclusive cycling opportunities in their area.

User: UK Student Volunteering Network

On behalf of the members of the *Student Volunteering Network – London Region*, we welcome the opportunity to provide feedback on the Draft New London Plan 2018.

We believe that the important role that student volunteers and university volunteering centres have in their local communities should be highlighted in the London Plan.

University Students in London contribute over 100,000 hours of volunteering per year, with the University of East London students alone having logged 12,000 hours during the 2016/17 Academic year. Student volunteers as individuals and groups contribute to the process of community development by committing time and energy to benefit society, the community, environment and individuals.

Volunteering is relevant to all spheres of life and student volunteers are making a positive impact on economic, social, cultural and environmental issues.

User:	Environment Agency

We welcome the recognition in this chapter of the contribution of local green and open space to stimulating play and recreation, and thus to social well-being.

User: London Councils

London’s growing population means that the provision of new social infrastructure, such as schools and healthcare facilities, is increasingly important. Boroughs are already setting out needs assessments of social infrastructure in development plans but providing adequate social infrastructure will require increased financial investment. There is a need to ensure that contributions from new development provide adequate social infrastructure and a focus on small development sites may impact on finances and land available to do so.

Boroughs are keen to work with the GLA to develop new models for the delivery of social infrastructure to ensure that the needs of London’s growing population are met.

User:	London Councils

We broadly welcome the proposals in this chapter and the recognition of the need for infrastructure to be planned holistically. We have suggested a number of amendments to better strengthen the London Plan and make sure that the planning system delivers the necessary infrastructure for London.

User:	London Borough of Hillingdon

The delivery of social infrastructure is essential to support the ambitious housing targets that are put forward in the draft plan. The policies which support the retention of existing social infrastructure and the provision of new facilities are broadly supported. However, if boroughs are expected to deliver such high levels of growth, the Mayor should provide direct funding to ensure the delivery of essential health and education facilities.

User:	London Borough of Hackney

Local authorities are required by law to assess the need for school places, and deliver any additional capacity required. This process is supported, in London, by the GLA's own demographic projections that provide essential detail on the situation in neighbouring boroughs, as well as an overall macro analysis. Strategic plans are then produced by local authorities to deliver any additional places needed.

It should be ensured that proposals for new schools are assessed in accordance with need and the impact Free Schools can have on this should be acknowledged and addressed as Free School programme effectively works outside the strategic approach mentioned above.

User: London Borough of Enfield

1) With regard to healthcare, there is a need to plan for more than 5 years.

2) Local Plans should identify sites to satisfy school places demand.

3) It provides limited guidance on the provision of play space as a result of development and does little to address non – residential play provision.

4) Affordability of sports and recreation facilities need to be factored in demand assessments.

5) Promotion of use of ACVs is welcomed however, local authorities will continue to undertake a process of assessment and apply appropriate weight on a case by case basis.

6) It is also worth noting the definition of social infrastructure for the purposes of the London Plan has changed considerably with a clear omission of Public Houses and we would recommend the draft plan revisit this.

User: Just Space

Chapter 5 Social Infrastructure

Reinstatement of Lifetime Neighbourhoods Policy

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

'Lifetime Neighbourhoods' provide definition and detail for inclusive and sustainable communities. They are places that meet the needs of a local community at all stages in its life, recognising health and well-being, social networks, a thriving local economy and a sustainable environment. Lifetime Neighbourhoods are also important for fostering a sense of belonging, building networks of community organisations and enabling communities to thrive together.

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

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

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

User:	HTA Design LLP

Though housing and the environment are clearly high on the agenda it is good to see the role and value of social infrastructure, particularly in enabling community cohesion, recognised as a valuable aspect of London that must be retained and encouraged. In particular we welcome the recognition of the multiple roles town centres can play in a changing society beyond purely a retail destination, but also through a place that is valuable to civic life.

User: Mr Liam Kelly

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

Whilst Policy S1 recognises the need for the protection of social infrastructure, it does not apply the principles of GG1 nor evidence and base policy on the escalating loss of social infrastructure, particularly community space.

User: Gidea Park and District Civic Society

We are concerned as to the sustainability of the obsession for growth and expansion within a relatively confined area even as large as London, it leads to ever more dense development and inevitable destruction of the very character you wish to retain.

Greater vision is required in addition to the obvious need to move some jobs away from London which will also ease housing demand. More people are to be crammed into high density developments causing overcrowding and social problems, will the actual designs match aspirations, past experience suggests otherwise ! The provision of infrastructure increasingly becomes proportionately more expensive.

The proposals to push more housing into the suburbs will totally undermine their character and is funding available for the necessary additional infrastructure ?

User: Zacchaeus 2000 Trust

CHAPTER 5 - SOCIAL INFRASTRUCTURE

As an anti-poverty charity, Z2K recognises most ordinary Londoners rely on public services, and that these need to be expanded to meet those needs of a growing population. We are especially concerned about the current pressures on both school places and NHS facilities. While the Community Infrastructure Levy (CIL) approach does at least offer greater certainty of meaningful financial contributions to those services in the medium-term, it doesn't bring forward the payments of those monies significantly, which means there is still likely to be a long delay in schools and GP practices being built. Given this, we believe the Boroughs should be encouraged both to be more specific about the need for these provisions in site allocations in their own Local Plans.

User: Chartered Institute of Architectural Technologists

Social Infrastructure

The interaction and integration of London's population is key to a successful and thriving city. We are pleased at the level of detail and scrutiny that the plan requires London boroughs, through their individual local development plans, to put development proposals through, prior to the granting of consents.

It is also pleasing to see the inclusion of accessible toilet facilities and requirement to provide provision that meeting the 'Changing Places' standards in larger developments. As such, we are in agreement with the proposals contained in the plan.

User: Mrs Alex Constable

I am concerned that there is not enough protection for youth clubs in the plan, just acknowledgement of the vital role they play in communities.

Last year my community rallied to protect Danson Youth Centre but I am personally concerned that the Draft Plan will hasten its replacement by flats. It has been there for generations now and is precious to children and parents alike.

I would like to see Community Asset added to the list of considerations: privacy, heritage, biodiversity and green belt is not enough.

User:	Queen Mary University of London

Firstly, with regard to Higher Education, it is considered that whilst within the Plan there is a recognition of the contribution that University's play in the London economy and delivering global competitiveness there is no singular policy which both outlines this position and sets out support for the growth and development of the University Estates across London. QMUL would request that a standalone policy is prepared which strengthens the support for Universities and helps them to deliver the expansion of their Estates to address the need to ensure an excellent student experience and the growth required. QMUL would welcome the opportunity to engage on this.

User:	Landscape Institute London
LI London generally supports this chapter,	

User:	Landsec

Chapter 5: Social Infrastructure
Landsec broadly supports the Plan in respect of Chapter 5, Social Infrastructure.

User:	Dr Helen Crawley

The relationship between social infrastructure, social cohesion and food should be considered further within planning, particularly considering the needs of pregnant women and young families to be included in communal events. For example, support and appropriate facilities to ensure breastfeeding mothers are welcomed and breastfeeding is encouraged.

User: Mill Hill Neighbourhood Forum

The other measure of density must relate to whether the local infrastructure can be developed to support such development. Following recent growth, it is now almost impossible to get an appointment with a GP in under 3 weeks in our area. As Barnet has grown into almost the most populous Borough in London over the last 15 years the transport infrastructure, schooling, etc have not been developed to cope. Orbital links across NW London are appalling. Journeys into London by the Northern Line are OK if you can survive the crush! The branch line with its shuttle service outside peak times to Mill Hill East is woefully inadequate for purpose. While the Thameslink line to Mill Hill Broadway has improved tremendously with new trains and more per hour will soon stop, the station itself is not fit for purpose with 39 steps to the platform and no lift.

For Mill Hill (or any other part of North West London) to cope with any further expansion better public transport must be provided. We suggest that the old railway line between Mill Hill East, Mill Hill Broadway, Edgware, Bushey and potentially Watford should be strategically reserved for future transport services. In the immediate future between Mill Hill East & Edgware a safe cycle route could be achieved at relatively low cost; indeed, an additional bus service could provide relief to existing routes and access into the Copthall green spaces and Saracens Rugby Club. Ultimately this could be a Lite-Rail service from Finchley Central through to Bushey. We would whole heartedly support the development of a rail service from Mill Hill Broadway along the Thameslink line then through Dudden Hill freight line to Old Oak Common. These strategic improvements are well within the timeline of the new London Plan but will be made impossible if the existing routes are not now reserved. This forward thinking requires proper review and feasibility/costing studies if any further development is to be enabled.

User:	Oneill Homer

S1-S6 Planning for social infrastructure need not be complex if there is a means of identifying capacity issues and planning for new infrastructure at the local level. Local Plans ought to have an effective spatial scale for this purpose but often fail to grasp needs and opportunities. However, provided they have an understanding of the supply of and demand for schools, doctors etc in their wider area, neighbourhood plans can manage the interactions between service providers in the local area to plan for the retention, improvement and replacement of social infrastructure.

User: Highams Park Planning Group

PUBLIC & COMMUNITY FACILITIES (PCF)
Development should aim to contribute to public and community facilities in the Area and bring improvements to meet the needs of the growing population (Objective 2).

It is essential that the present community infrastructure of the Area be maintained and strengthened to meet the needs of a growing and changing population. This requires that people's needs are met by the provision of the appropriate quantity, quality and accessibility of infrastructure such as educational services, health facilities, community centres, libraries, sports and leisure facilities, community spaces and meeting places, public houses, etc.

The provision of healthcare and educational facilities falls outside the scope of the powers of a Neighbourhood Plan. However, we are aware that concerns have been expressed during our consultations by local residents that there is a shortage of school places and that healthcare provision is under stress.

The Area has only one Council owned community facility: Hale End Library in Castle Avenue. This civic building is widely used and appreciated but can only provide limited support for the community's needs as it is only open for four days a week. Consideration should be given to expanding its role to link with other Council services so it can be used as a 'community hub', by extending its opening hours, possibly to seven days a week and for extended periods each day. Members of HPPG are already in active dialogue with library staff with a view to achieving this objective. Following an application by HPPG, the library was added to the Council's list of "Assets of Community Value" in September, 2016.

POLICY PCF1: Hale End Library:
Development of this site shall ensure that it maintains a wide range of public, social and community facilities to meet the needs of a diverse and growing population. This shall be achieved by ensuring that any development of the site:
i. Maintains the services and community space provided by Hale End Library at the existing level.
ii. Retains the existing number of customer car parking spaces.

Religious centres, pubs and other social areas are neighbourhood focal points for meetings, exercise classes, special interest clubs and entertainment venues. HPPG is in the process of preparing applications for the assets listed in Policies PCF2 and PCF3 to be designated as Assets of Community Value and added to the Council's list of designated assets.

User: Federation of Enfield Residents & Allied Associations

1. **The value of community-oriented policies**: The London plan makes great play on communities and this is to the point, but there is little follow-through. In Enfield we have great difficulty in persuading the council to shape policies to this objective, but success is key to retaining quality of life, and encouraging volunteering and mutual help amongst residents.

Library services are under even more threat today, but we consider it key to education and community cohesion that these facilities remain open and accessible. Death by a thousand cuts is no policy, but we see no firm intent in the LP towards stopping abandonment of non-statutory services.

User:	Joy Brown

CHAPTER 5: SOCIAL INFRASTRUCTURE.

Quality of life has the potential to maximize educational and skills attainment, improve health and increase productivity. It needs much more emphasis.

User:	Levitt Bernstein

We have not provided comments on Chapter 5 (Social Infrastructure) but would like to express strong support for the concept of local community hubs; multi-purpose facilities that support multigenerational, multicultural interaction. Such facilities can be a first port of call for those in need of help, advice or information (providing contact details of local charities, organisations and services), provide onsite facilities such as health checks, podiatry, exercise classes, sport, music and dance, safe play, affordable child care, adult day care, after school care, evening classes and coordinate outreach services such as meals-on-wheels and social care. All of this helps to build a sense of community, encourage participation and mutual support, improve health and reduce loneliness.

User:	Diocese of Southwark

The Diocese of Southwark asks the Mayor to include places of worship in new developments as a planning requirement.

Chapter 6 Economy

User: Mr Daniel Willis

Retail gentrification and the Night-Time Economy

We commend the Mayor's efforts to foster a more equal, polycentric, diversified economy which delivers opportunities for all of London's communities. Community Links welcomes the Mayor's reference to digital connectivity as a crucial component of London's future. In fact, we are developing a Digital Hub which will provide digital skills and employability training to the local community. We are pleased to see that the proposed Plan aims to prevent loss of "essential convenience and specialist shopping" units and that local identity will be a factor in planning decisions regarding economic activity. In principle, this suggests that the new Plan will support the entrepreneurship of Newham's diverse communities and protect the numerous cafés, supermarkets and retail outlets which support BAME communities (including East London's growing Eastern European and Latinx populations).

However, on this point there again appears to be a contradiction between the Mayor's attempt to create a more welcoming, inclusive and equal London and the intention to embark on widespread intensification projects. As Hubbard has argued, in regeneration and gentrification processes it is often corner cafés, "convenience 'ethnic' grocery stores" and pubs which are among the first to be replaced. As well as contradicting the Mayor's emphasis on developing a more diverse and entrepreneurial economy, this process would have a detrimental effect on community cohesion as these independent retail units play a crucial role in supporting ethnically diverse and less affluent communities. The Equality Act 2010 states that public bodies should consider inequalities caused by socio-economic disadvantage when making strategic decisions, but we fear that the new Plan risks exacerbating existing inequalities by favouring retail gentrification. In order to avoid this, we believe that the London Plan must include steps that enable the genuine participation of communities, business owners and employees in re-shaping their local retail environment.

Community Links therefore supports calls from Just Space for: the Mayor to implement the Equality Act's socio-economic duty in all decision-making processes related to economic activity; and for the Plan to include a commitment to ensure the representation of diverse industrial sectors, including businesses owned by ethnic minorities and migrants, on GLA decision-making boards. We also call upon the Mayor to include a specific clause in the new London Plan which recognises the role played by diverse, independent retail units in London's economy and their importance for creating a welcoming, inclusive and vibrant atmosphere for everyone. Furthermore, we call on the Mayor to ensure the protection of these units in future planning decisions by drawing up a register of SMEs, businesses and commercial spaces across London that play a crucial role in the economic, social and cultural life of the local community.

Phil Hubbard (2016). Hipsters on Our High Streets: Consuming the Gentrification Frontier. *Sociological Research Online*, 21 (3).

Suzanne M. Hall (2011). High Street adaptations: ethnicity, independent retail practices, and localism in London's urban margins. *Environment and Planning A*, 43:11, pp.2571-2588.

Just Space (2018). Towards an industrial strategy for London (draft). Just Space: pp.3-4.

User: Taxpayers Against Poverty Ltd

Dear Mayor Khan,

We are sending you a hard copy of **DEBT DEATH & DEADWEIGHT** as the last of our four submissions to the consultation on the London Plan. The Editor is Fred Harrison who the director of the Land Research Trust and also a director of Taxpayers Against Poverty. It can be found online here.

There are three things a London Plan cannot do. If they are not identified and published then the Mayor will be blamed over the years until 2041 for not delivering a sustainable plan which improves the health and wellbeing of all Londoners, when the blame ought to be pinned on national policy or lack of it.

You cannot ban the purchase of London land by national and international speculators. Without such a ban the mistakes of the 1979 UK government will carry on raising housing prices and rents of out of the reach of many Londoners, creating debt, hunger, homelessness and ill health. The 1979 government deregulated lending, abolished rent controls and allowed the free flow of cash in and out of the UK. Money has poured into a UK housing market in short supply. That was let rip by the 1997 UK government and has not been curbed since 2010.

You cannot require the Treasury or the OBR to publish the deadweight loses in the UK from the present lack of a sustainable national housing policy. But you ought to do it for London so the public can understand how we are cheated of the wealth buried in London land by the present lack of a sustainable national housing policy.

You cannot improve the health of the poorest Londoners. Their incomes are subjected to the punitive national regime of the present government so the impact of low incomes on their mental and physical health, life expectancy, infant deaths, low birthweight , hunger, homelessness and rough sleeping is out of your control. Please see Land grabbing, income inequality and state-sanctioned debt by Paul Nicolson.and TAP health equality campaign of 9 Blogs about low income, debt, hunger, mental and physical health by Dr Angela Donkin, Professors Kate Pickett and Richard Wilkinson, Carl Walker and Madeleine Power. .

Yours sincerely,

Rev Paul Nicolson

Taxpayers Against Poverty

Fred Harrison

Land Research Trust

User: Taxpayers Against Poverty Ltd

Dear Mayor Kahn,

Our first submission in my letter to you dated 9th February cited the work of the late Professor Peter Ambrose.

The wealth of London, like so much wealth in UK, has been buried in its land rather than invested in the creation of jobs and homes His analysis showed that £600bn has been buried in UK land since 1980s (see Ambrose 2005 Z2K memo to PM).

The wealth in London land ought now to be fairly shared for benefit of every Londoner. We suggested land value tax in our letter of the 9th Feb. Here is the case for it.

User: Shared Assets

We support London Food Link's response:

The Economy chapter relates to the wide scope of food, particularly access to healthy food. The draft New London Plan states that: ‘Obesity is one of the greatest health challenges facing the capital’, and as such measures to tackle this at a systemic level needs to be developed.

We therefore welcome the proposed restrictions on fast food outlets, including the requirement for food outlets to comply with Healthier Catering Commitment standards; the measures to improve retail provision in under-provided areas; and the reference to farmers’ markets. Sustain supports these policies, but would like to see them taken further to ensure that healthier food provision can help reduce obesity and other diet-related conditions.

However, in some respects, the Economy chapter lags a little behind some of the other chapters in its commitment to health and sustainable development. There might be a danger in this, if decision-makers find themselves able to choose either ‘healthy and sustainable’ or (unhealthy, non-sustainable), purely ‘economic’ options. We hope that our comments will enable the promotion of healthy and sustainable economic development. We further note that this would also help to meet the Mayor of London’s fairness, social inclusion and employment objectives, as the food sector is a major employer – production, manufacturing, foodservice and retail – present in every neighbourhood.

In summary, we are recommending amendments to encourage:

- Initiatives to **support enterprises engaging in food growing, preparation, storage, selling, cooking and food surplus management –** for example provision of low-cost business space.
- Provision of free-to-use and easily accessible drinking water fountains in the design of business, transport, public event space and shopping areas.
- Provision of easily accessible water supplies and tool storage facilities for community food growing spaces.
- A stronger approach to **increasing access to healthy food,** via policies that encourage neighbourhood shops, with a particular emphasis on those that sell fresh fruit and vegetables and other healthy items in deprived areas, at affordable prices.
- **Community gardens on vacant land** in business and shopping areas, using planning agreements to secure these.
- **Kitchen gardens in office and industrial areas.**

- London’s parks and gardens as educational and tourist destinations, and their productive use for gardening and locally grown fresh food in associated catering establishments. The Royal Parks and several boroughs have championed this approach, for example The Regent’s Park Allotment, which provides training and educational opportunities.
- **Skills development in gardening, marketing, cooking and serving of healthy food**, as a vital component of the Mayor’s drive for skills and opportunities for all.

User: London Legacy Development Corporation

Economy

LLDC notes the identification of Stratford as a potential future reserve for CAZ-related office capacity. The scale of investment being made here is hugely significant, and the establishment of new office space at International Quarter London and Here East; the development of the Westfield retail offer; the establishment of the Culture and Education District; and improvements in transport infrastructure and connectivity – including our joint working with TFL o address existing and future pressures on Stratford station – all contribute to the area's credentials in this respect.

Many of the London Plan's policies around the delivery and support for low cost and affordable workspace have already been applied within the LLDC area, most notably in relation to the outline Hackney Wick Central Masterplan – this has a resolution to grant permission to incorporate nearly 30,000sqm of B1c workshops, of which approximately one third will be affordable or low cost. Our current Local Plan also seeks to maintain, and where appropriate intensity, industrial floorspace capacity. We would welcome the opportunity to share our experiences in this area. As mentioned above there is a balance to be struck between protecting employment space and meeting the requirement for more housing, and more clarity would be welcome in terms of how this can be achieved in practice. The approach set out for safeguarding the capacity of and intensifying areas of Strategic Industrial Land and its functions is supported. The LLDC Local Plan Review will provide an opportunity to reinforce this approach and to consider where consolidation of uses might be appropriate.

User: Thurrock Borough Council

Policy E5 – Strategic Industrial Land (and supporting Text)

Policy E7 –Intensification, co-location and substitution of land for Industry, logistics and services to support London's economic function (and supporting text)

Policy E8 Sector Growth and Clusters (and supporting text)

Policies within the draft London Plan (E5, E7 and E8) refer to the potential of relocating some employment to the Wider South East Region and collaborative working with authorities outside London on this matter. At the Wider South East Summit in 2018, the Mayor referred the example of Royal Opera House's linkage to Thurrock and the Deputy Mayor agreed to joint research on the location of firms. Thurrock Council welcomes the recognition of the wider economic impact and linkages of London to the surrounding areas and would welcome ongoing collaboration with the Mayor on this matter including potential mutual benefits of the relocation of businesses from London.

User: London Food LInk /Sustain

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In summary, we are recommending amendments to encourage:

- Initiatives to support enterprises engaging in food growing, preparation, storage, selling, cooking and food surplus management – for example provision of low-cost business space.
- Provision of free-to-use and easily accessible drinking water fountains in the design of business, transport, public space and shopping areas, particularly those frequented by children.
- Provision of easily accessible water supplies and tool storage facilities for community food growing spaces.
- A stronger approach to increasing access to healthy food, via policies that encourage neighbourhood shops, with a particular emphasis on those that sell fresh fruit and vegetables and other healthy items in deprived areas, at affordable prices.
- Community gardens on vacant land in business and shopping areas, using planning agreements to secure these.
- Kitchen gardens in office and industrial areas.
- London’s parks and gardens as educational and tourist destinations, and their productive use for gardening and locally grown fresh food in associated catering establishments. The Royal Parks and several boroughs have championed this approach, for example The Regent’s Park Allotment, which provides training and educational opportunities.

- Skills development in gardening, marketing, cooking and serving of healthy food, as a vital component of the Mayor’s drive for skills and opportunities for all.

User:	Mrs Belinda Taylor

Policy E8: London's food and restaurant sector should be included as one the the Mayor's sectors to promote enterprise, particularly those that promote halthy food and are led by local organisations.

User:	Mrs Belinda Taylor

Policy E9: The ban on new fast food takeaway outlets within 400m of schools is welcome. IThe ban should be extended to include outdoor advertsising or unhealthy food and sugar-rich drinks (legal High Fat, Sugar and Salt HFSS definitiion used by Ofcom), especially on public transport routes used by schoool children.

User: Mrs Belinda Taylor

Policy E9

The ban on new fast food outlets within 400m of schools is welcome. This should be extended to include a ban on outdoor advertising of unhealthy food and sugar-rich drinks (legal High Fat, Sugar and Salt HFSS definition used by Ofcom), especially on public transport routes used by school children.

User: Mrs Belinda Taylor

Policy E9

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User:	Buckinghamshire County Council

Support the protection for the industrial floorspace for the SIL and LSIS to ensure that there is no net loss and also support the policy seeking intensification of the employment areas with increased density to ensure better use is made of limited land resources and in providing flexible and affordable space for SMEs.

Support the policy for intensification and mixed-use in the Town centre to make best use of space and facilities in sustainable location with active day and night economies.

User: Home Builders Federation

Chapter 6: The Economy

The various policies in this Chapter place far too much onus on residential developers to resolve London's employment space problems with the inevitable competition for land that results from this. The level of detail and conditions all these policies impose on residential development will either render development very unviable or else result in lengthy negotiations as applicants and the LPA and the GLA debate over what will have to be dropped to ensure an implementable scheme.

Residential developers generally are not expert at building and managing employment space, but this is what the London Plan now expects. Only the largest PLC housebuilders may prove capable of doing this, but even this will be costly for them. It will result in prolonged negotiations with the Boroughs and the GLA. This will soak-up money that should be directed towards supporting other more vital planning objectives, such as providing more affordable housing and it conflicts with the Agent for Change principles that the Mayor now wants embedded in the London Plan.

On the whole, the policies in this chapter are wholly unrealistic and will prove ineffective in either protecting and enhancing employment space or supporting the delivery of housing. This is over a period when overall housing supply will need to double.

Policies E1: Offices

The policy is unsound because it is unjustified and in-effective in terms of helping to deliver London's housing needs.

Our chief concern with this policy concerning employment/industrial land is it will tend to reduce and land available for housing supply, rather than increase it. While we acknowledge the theory that encouraging higher densities and mixed uses will help to improve housing delivery while avoiding any net loss of the employment space, and enhancing provision, the truth is that these policies will add complexity and cost of the development process and this will deter applications.

The redevelopment of offices where these are surplus to local requirements has been an important component of London's housing supply. The introduction of stricter policies controlling the loss of office land as well as enhancing supply, will make development more difficult.

Part E. In terms of Part E we consider that the individual London planning authorities are better placed to judge whether existing viable office space outside of the CAZ and NIOD should be retained. We recommend that Part E is re-worded to read:

"In bringing forward their Local Plans, LPAs should consider whether it is appropriate to retain all existing office floorspace. LPAs should consider applying Article 4 Directions to remove permitted development rights…"

Part G. This part of the policy should be re-worded to allow the London LPAs a greater element of discretion in their Local Plans in terms of how this policy is applied, reflecting the possibility that the attainment of other policy objectives including supporting housing delivery, may be locally more important than enhancing the supply of employment space. We recommend that Part G is re-worded to read (our recommended additional text is underlined):

"G Development proposals should:

1) Where appropriate, take into account the need for lower cost and affordable workspace…

2) Where feasible and viable, examine the scope for the re-use of otherwise surplus large office spaces for smaller units."

Policy E2: Low-cost business space

The policy is unsound because it is unjustified and ineffective.

Whether it is appropriate to always protect and increase the amount of low cost B1 business space in new developments when balanced against other planning objectives (such as 50% affordable housing), is a matter for the London LPAs to determine as they prepare Local Plans. The policy should be more flexibly worded to allow the LPAs greater discretion in the application of the London Plan policy in this regard. Part B should be re-worded to read (our recommended additional text is underlined):

"2) Where feasible and viable ensure that an equivalent B1 space is re-provided in the proposal…"

3) Where it is possible applicants should be encouraged to provide alternative accommodation…"

Part B should be redrafted to read:

"*Where feasible and viable and having regard to other planning objectives development proposals for new B1 business floorspace…".*

Policy E3: Affordable workspace

The policy is unsound because it is unjustified.

This policy is too onerous.

Part C

We recommended that Part C is re-worded to allow the Boroughs through their Local Plans to decide whether it is appropriate to develop more detailed affordable workspace polices. We recommend that Part C is re-drafted to read:

"Boroughs, in their Development Plans Local Plans, are encouraged to consider more detailed affordable workspace policies in the light of local evidence of need and viability and other material considerations such as the need to support housing delivery, including the need to improve the supply of affordable homes."

Part F

We do not understand why this part of the policy has been drawn-up. While we appreciate the desire to protect industrial land as far as possible – although some flexibility on this is desirable – a requirement to ensure that workspace floor-space has to be completed and is available for use before the residential elements are occupied is unreasonable. Many developments rely on advance home sales to shore-up the viability of schemes: it provides cash-flow including the ability of developers to pay CIL up front which is a requirement of the Regulations.

We are also aware that the Mayor and the public are concerned about new homes being left empty (although the evidence provided UCL and York University for the GLA suggests that this is far less of an issue than people imagine). This policy would hardly help in this regard, or more importantly, help those households in desperate need of accommodation.

This policy would also give a misleading impression to Government and the general public of the extent to which London was meeting its housing targets if a proportion of these homes were not actually allowed to be occupied pending the need to find occupiers for the workspace.

Part F should be deleted.

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

The policy is unsound because it is unjustified.

We have previously commented on our concerns about the impact of the employment policies on the future supply of land for residential development. This is primarily a consequence of the aim of no net loss of industrial floorspace capacity in the SIL and the LSIS (paragraph 6.4.3 refers to the volume of the land in these categories). While we can understand concern about the rate at which industrial land was transferred to other uses, presumably residential in the main, as set out in paragraph 6.4.4, the fact is that if this supply is now to be significantly reduced at a time when housing supply needs to double, then alternative sources of land must be identified by the draft London Plan.

The Mayor's trump card is to mix uses and raise densities. This is a risky strategy and one that is by and large untested. As an untested approach it may take time for the development industry – residential developers and commercial developers - to gain expertise in integrating uses. These are new skills that will not be acquired in sufficient scale quickly enough across the development industry (and certainly not by new entrants) to guarantee the delivery of 65,000 homes each year from 2019.

Furthermore, given the growth in demand for commercial floorspace, and in particular logistics, it is our view very unlikely that opportunities for mixed use will come forward on anything like the scale envisaged in the Plan. Indeed, the logistics sector is increasingly looking at multi storey provision on its existing sites in order to accommodate demand arising from the absence of new sites.

Part B is unsound because it is unjustified.

Also, we do note that the draft London Plan does identify scope for the redevelopment of redundant utilities sites, as in Policy H1 B 2) F. The policy should make this distinction. We recommend that the footnote 78 to B 3) is amended to provide clarity that redundant utilities and transport land is not formally covered by the SIL and LSIS designation in a Local Plan. Footnote 78 should read instead:

"Sites containing industrial and related functions that are not normally designated as SIL or LSIS in a Local Plan including sites previously used for utilities or land for transport related activities which have been assessed by the local authority as no longer being required."

Footnote nine should also be elevated into the main text of the policy rather than sit as a footnote.

Policy E5: Strategic Industrial Locations

The policy is unsound because Part D conflicts in part with national policy.

We appreciate the importance of safeguarding Significant Industrial Locations (SIL) in London. Unlike some policies in the draft London Plan this is an issue that it is quite appropriate for the draft London Plan to address.

However, it is clear that the Mayor has allowed some of the boroughs, to allocate SIL sites for residential development. This is described in paragraph 2.57 of the SHLAA 2017. It is unclear how many SIL sites have been exempted (the SHLAA does not provide the detail) but we expect it includes some.

We support part D that allows the re-development of SIL sites for other uses (other than those set out in Part C). We agree that this should be done through the preparation of an up-to-date Development Plan (although this should be changed to Local Plan). We are not sure that it should be allowed through the other channels that are referred to in part D.

We are not sure what a ‘planning framework’ is as referred to in this paragraph, or what is meant by a “coordinated master-planning process in collaboration with the GLA or relevant borough”. If it is vital that existing SIL sites are protected then the re-allocation of these should only be allowed to occur through a Local Plan that is open to proper public scrutiny. This Local Plan will be prepared with reference to the draft London Plan.

Part D should be amended to omit the references to planning frameworks and master-planning as it is unclear what these are and because strategic allocations – including a change of use from one strategic use into another - should really only be made through a Local Plan (NPPF, paragraph 47).

Policy E6: Locally Significant Industrial Sites

The policy is unsound because it is ineffective.

We appreciate the importance of safeguarding Locally Significant Industrial Sites (LSIS) in London. We have no doubt that such sites are coming under increasing pressure for re-development for residential use. However, it is clear that the Mayor has allowed some of the boroughs, to allocate LSIS sites for residential development. This is described in paragraph 2.57 of the SHLAA 2017. It is unclear how many LSIS sites have been exempted (the SHLAA does not provide the detail) but it probably includes some.

We consider that the question of whether an LSIS site should be allocated for redevelopment (mixed use where feasible or for pure residential) is properly a matter for the local authority in question and it should be able to explore this question through its Local Plan. As a local designation it is more appropriate that decisions over the future of these sites should be made the LPAs. Policy E6 should allow the London LPAs some discretion to decide whether it is appropriate for these sites to be kept as industrial sites. This should be explored through the preparation of a Local Plan. This would allow third parties, including the Mayor of London, to challenge a decision by a Borough to re-allocate. We recommend that Policy E6 is re-drafted to include a new paragraph at the beginning that reads:

“A Through their Development Plans Local Plans, boroughs London LPAs should:

1) explore as part of their assessment of their housing and employment land supply needs whether LSIS sites should still be retained for industry. This judgement should be based on consideration of up-to-date material considering the future demand for such sites for industry in the local authority. Such sites can only be re-allocated for residential development through the Local Plan process;

2) Define detail boundaries and policies…etc".

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

The policy is unsound because is it unjustified and ineffective.

The concerns we have expressed regarding Policy E4 apply equally to this Policy. The commercial sector is already pursuing intensification of existing sites to meet demand, e.g. Segro are now promoting multi storey warehouses of up to four storeys. We understand that warehouses of up to 14 storeys are being constructed in Asia. Our concern that the aim of this policy to provide mixed-use development on SIL, LSIS and Non Designated Industrial Sites, is that it is unrealistic. Mixed use schemes are unlikely to be pursued at sufficient scale to provide the number of homes the Mayor expects from this source.

We note paragraph 2.50 of the SHLAA 2017. The SHLAA gives a 'low probability' rating of:

40% for LSIS sites in a 'restricted' borough;

50% for LSIS sites in a 'limited' borough;

60% for LSIS sites in a 'managed' borough.

Paragraph 2.51 states that a broadly similar approach is taken for Non-Designated Industrial Land except the probability estimate is increased by 5% in the 'restricted' and 'limited' boroughs.

Needless to say, the SHLAA does not describe to people which boroughs fall within these categories and how this correlates to land supply/housing yield expectations.

Setting to one side the opaqueness of the SHLAA, the discounts are still too generous. In view of the difficulties of developers integrating housing with industrial uses (environmental and health and safety hazards and Agent for Change objectives) the discounts are too generous. It would be safer to assume that no more than 20% of these sites (LSIS and Non Designated) will ever be developed for mixed-use, and even this 20% seems very generous to us.

Moreover, these are merely estimates based on hypothetical assumptions by the GLA. Such estimates should not take the place of rigorous housing land supply assessments as part of the preparation of a sound Local Plan.

The Mayor is wholly unrealistic to expect industrial sites to be re-developed for mixed uses, while also providing the residents with the appropriate environmental, health & safety safeguards, including meeting Agent for Change principles, while also providing 50% affordable housing. Despite the theory, industrial and residential mixed use development is unlikely to be viable, or attractive to purchasers, in practice.

The impact of this policy is likely to be felt most in the Opportunity Areas (OAs) of outer London where the combination of increasing industrial land values and falling residential land values will make mixed-use schemes much less attractive. This will have an adverse consequence for the housing supply estimates from the OAs.

We note figure 6.3. We accept that the illustration in figure 6.3 is ‘simplified’ but we would argue that the assumptions are over simplified to the point of being unrealistic. As a minimum we would expect to see significant evidence that the commercial sector supports this proposal, especially in terms of the near elimination of a B8 yard from the storage and distribution component. (We are really struggling to see how this would be acceptable or safe for residents).

The NPPF requires that Local Plan should be aspirational but they must also be realistic. The Mayor’s industrial-residential mixed use assumptions are unrealistic in this regard.

We consider that all the discounts must be adjusted to a uniform 20%.

Part D

The Mayor is extending his control to the development of Non-Designated Industrial Sites through this draft policy. While we understand the Mayor's concern to protect industrial sites of all types. Even so such sites will have contributed to a proportion of housing delivery across London in the past decade. This will be reflected in the trend for housing completions across London. If this component of past supply is 'switched-off' entirely, this may have a deleterious effect on sustaining housing delivery in London. We think the draft London Plan should allow for more discretion at the local level as the London LPAs may be better placed to assess the need to retain all Non-Designated Industrial Sites. We consider that the assessment of the need for, and allocation of, Non-Designated Industrial Sites for residential or mixed-use development should be a matter for the London LPAs to assess and consider as they prepare their Local Plans. Following an assessment of the need for Non-Designated Industrial Sites, if the LPA considers that it has a surplus of industrial space, and that some sites lend themselves to re-development for another or mixed-use, then they should be able to allocate them for these uses through the Local Plan. To this end, we recommend that Part D is re-drafted to read:

"D Local planning authorities are required to assess locally the need for Non-Designated Industrial Sites through the preparation of their supporting Local Plans. Local planning authorities may choose to redevelop these sites for mixed-use or residential development proposals where: …"

<u>Part E3) is unsound because it is unjustified</u>

It is unreasonable to demand that the industrial, storage and re-distribution uses are completed and operational in advance of any residential component being occupied. Advance sales of residential schemes may well be crucial to the viability of mixed-use schemes and paying the CIL and S106 infrastructure requirements.

Part E3) should be deleted.

Policy E11: Skills and opportunities for all

We support this policy. It is helpful that the policy is not too prescriptive about how S106 obligations are used to support construction skills.

User:	Kew Society

We support the use of Article 4 Directions to remove permitted development rights where appropriate so that Boroughs can achieve the right balance between housing, employment and social infrastructure.

User: LFoSR - The London Federation of Sport and Recreation

The Plan fails to focus adequately on the important role that Sport can play in the development of London in the next 20 years. The importance of sport is recognised at a local / community level but there is no focus on the importance of the sports sector in driving **economic development** (new business opportunities, employment, spend in the London **economy** linked to sport etc

The Plan fails to focus on strategically important sports issues in London: there is virtually no reference to the Olympics or the Olympic legacy (only the Olympic Park); there is no mention of the strategically important sports facilities that London needs (eg 50 metre swimming pools); there is no reference to the role that international sports events can play in raising London's profile and boosting the London **economy** (there are no references to the planned international events or whether the Mayor will be encouraging bids for new events)

The London Federation of Sport and Recreation urges the Mayor of London to recognise the intrinsic benefits of taking part in sport and recreation as well as the very important health, **economic** and social outcomes it can deliver.

User:	Royal Town Planning Insitute

Whilst we welcome much of this chapter, we consider it could be improved. We would propose that there are further details on how the Mayor and the GLA will support outer London to reach its economic potential to ensure that London continues to be a sustainable polycentric city. Focus on the Central Activity Zone is important, but not at the cost of not realising the growth potential in other parts of the city.

User:	Wheels for Wellbeing

6.1 As a member of the Beyond the Bicycle coalition (a steering group made up of disabled, family and freight cyclists), we would like to see greater efforts made to encourage and incentivise businesses to use cargobikes for last-mile deliveries. Not only would such a policy generate good PR for companies, but it would also offer a sustainable form of transport and give the environmentally-conscience consumer greater satisfaction whilst, crucially, tackling congestion and air pollution. Financial incentives and subsidies could be offered to those businesses that choose to shift their deliveries to cargobike.

User:	London Assembly Planning Committee

The draft London Plan should more clearly define what is meant by the terms ‘low-cost business space’ (Paragraph 6.2.2), ‘affordable workspace’ (Paragraph 6.3.1), and ‘affordable business space’ (Paragraph 6.3.3), the distinction, and relationship between the three.

User:	London Tenants Federation

6.0.1 This chapter adds to our concerns that the draft London Plan policy principally benefits those at the top end (by income) at the expense of those with below median income levels. Policy E11 text, paragraph 6.11.1 expresses precisely the problems: London apparently has a strong global economy, yet its employment rates have lagged behind the rest of the country for three decades. It has particularly high rates of youth unemployment and increasing levels of in-work poverty.

6.0.2 Social / affordable rent tenants and those living in more expensive private rented housing who really can only afford social-rented homes, necessarily suffer most.

User: Save Swiss Cottage

This chapter adds to our concerns that the draft London Plan policy principally benefits those at the top end (by income) at the expense of those with below median income levels. Policy E11 text, paragraph 6.11.1 expresses precisely the problems: London apparently has a strong global economy, yet its employment rates have lagged behind the rest of the country for three decades. It has particularly high rates of youth unemployment and increasing levels of in-work poverty.

Social / affordable rent tenants and those living in more expensive private rented housing who really can only afford social-rented homes, necessarily suffer most.

User: London Councils

The focus of this chapter on protecting and growing office and industrial spaces in London is welcome and reflects boroughs' aspirations. It goes much further than previous plans in clearly stating the importance of employment spaces and explicitly addressing their loss. However, further clarity is required on how boroughs can balance the need to provide land for employment and residential uses. Policy within this chapter also places significant additional burdens on boroughs in the plan making process.

A focus on intensification of town centre spaces, with greater mixed-use developments (discussed throughout the Plan but particularly in Polices E1 and E7) raises a number of practical questions of how boroughs can balance land use for economic growth and housing delivery. We are keen to work with the Mayor to consider how increased co-location of office and residential space could operate, and believe that this is an area of work where greater collaboration between the boroughs and the GLA could be of particular benefit.

User: London Borough of Hillingdon

The Council would like to see a greater recognition of outer London's economy in the prosperity of London. Specifically, the plan should recognise the different factors that are necessary for economic growth in outer London, particularly the need for improved transport connections and car parking.

A key factor in the success of the logistics sector in Hillingdon and of Uxbridge as an outer London town centre with a significant amount of office space, is the proximity to other parts of London via the motorway network. The draft plan should recognise the essential nature of transport to the success of outer London's economy, both in terms of providing sufficient public transport links from inner London and acknowledging that many residents travel to work in outer London centres by car.

It is important to note that many travel to work in Hillingdon from areas outside of London. Public transport options from these areas are limited and an appropriate level of car parking should therefore be provided.

User: HFFTRA

This chapter adds to our concerns that the draft London Plan policy principally benefits those at the top end (by income) at the expense of those with below median income levels. Policy E11 text, paragraph 6.11.1 expresses precisely the problems: London apparently has a strong global economy, yet its employment rates have lagged behind the rest of the country for three decades. It has particularly high rates of youth unemployment and increasing levels of in-work poverty.

Social / affordable rent tenants and those living in more expensive private rented housing who really can only afford social-rented homes, necessarily suffer most.

User: Suffolk County Council

Economy

Suffolk's economic relationship to London is recognised in the Economic Strategy for Norfolk & Suffolk published in 2017, which was coordinated by New Anglia LEP. Ipswich's 60-minute rail connection to central London is a significant asset, as is our connection to Cambridge, which is part of the Felixstowe- Nuneaton/A14 corridor. Like London, financial services are also a major driver of our economy and digital technologies is a key sector for growth. By way of example, all authorities in Suffolk are partners in TechEast2 and reinforcing linkages with London is a shared aim of this initiative

It would be helpful if, as part of the London Plan, the Mayor of London set out activities related to aligning economic development opportunities alongside those undertaken by local authorities and Local Enterprise partnerships. This might include drawing on current activities such between Tech City and TechEast. There are economic advantages to a wide range of businesses from being in Suffolk. These advantages could also apply to those businesses who might be in, or look towards, London but the potential for such advantages needs to be explored further. The LSE's review of research noted the relationship between London's employment growth and commuting and highlighted that managerial-technical occupations account for over 75% of net commuting into London and the entire growth in net inward commuting between 2004 and 2016 (LSE, page 78).

The draft London Plan places the potential for Stratford to act as a satellite for major office space but only after demand has exceeded the capacity of the Central Activity Zone and the Northern Isle of Dogs. The London Plan should be setting a positive framework to facilitate development and this hierarchy should not restrict the potential for "good growth" to occur in these satellite locations even if there is capacity within the other areas.

Policies within the draft London Plan (E5, E7 and E8) refer to the potential of relocating some employment to the Wider South East Region and collaborative working with authorities outside London on this matter. At the Wider South East Summit, the Mayor referred the Royal Opera House's linkage to Thurrock and the Deputy Mayor agreed to joint research on the location of firms. Councils in Suffolk welcome the recognition of the wider economic aspects and that London's policy and evidence base reflects on the office and industrial markets in the Wider South East.

The protection afforded to secondary materials and waste management in policies E4 and E5 is welcome and benefits the vitality of the wider waste supply chain but, in order to link with the safeguarding policy on aggregates (SI10), reference should also be made to aggregates within these policies.

2 TechEast is a private/public partnership working to promote opportunities for economic growth in digital technologies in the East of England

User: The Northbank BID

Chapter 6: Economy

Policy E1: Offices, E2 - E4 Land for industry, logistics and servicing, E8: Sector growth opportunities and clusters, E10: Visitor infrastructure, E11: Skills and opportunities for all

We are supportive of the provision of a range of sizes of work space to encourage enterprises to start and expand. The provision of sufficient space for smaller businesses is vital. However, the Policy could acknowledge that (especially in the CAZ) - there may be conflicts when new large-scale developments are proposed, which, while beneficial for the overall economic prosperity of the London, have the immediate impact of reducing space for small businesses, as a site is assembled and cleared for a new, larger development.

While central London will be costly, its good transport links and proximity to like minded businesses means that flexible working space will deliver growth. Ensuring central London is appropriately serviced is a high priority with many pilot projects to look at delivery and service planning undertaken by London BID’s. The space should be suitable for all types of business including creative and artist studio as well as technology needs and available with flexible terms.

User: London Borough of Harrow

The Council supports the draft Plan proposals to retain industrial floor space within London / Harrow; this is supported by the Council's own evidence. The Council however has concerns about the practicalities and feasibility of seeking to achieve housing on industrial land by intensifying the use of industrial land in order to free some of it up for housing. These concerns are two-fold — namely the practicality of co-locating residential and industrial uses. In many instances, such an approach will result in relatively benign industrial uses (i.e. storage) being delivered in order to address reverse amenity impacts of introducing residential to the area. Residential development will most likely preclude B2 General industrial.

Secondly from a Harrow perspective, much of our industrial land is on small estates with relatively poor access to the strategic transport network, reducing the likelihood of industrial intensification being attractive to developers and able to be achieved to an acceptable design standard. There are also general concerns about the financial feasibility of new build industrial development within the borough, as our rental levels are relatively low as our sites do not meet contemporary needs (size, quality, format of provision and access to strategic transport networks).

Harrow supports the Mayor's encouragement for Article 4 Directions to remove permitted development rights from office to residential, to allow greater control over the Borough's employment floor space. The draft London Plan has acknowledged Harrow (along with many other outer London Boroughs) has lost a significant amount of economic floor space though the Prior Approval Process.

User: London Borough of Enfield

1) The ability to deliver an additional 50ha of new SIL land, and potential compensation SIL and be able deliver the draft housing target numbers is strongly questioned.

2) New office clusters should be promoted in Opportunity Areas.

3) Affordable workspace needs a proper definition and a policy similar to affordable housing policy.

3) The Plan is too rigid and fails to recognise that SIL is not the same across London. There needs to be a level of flexibility involved in SIL policy, especially in areas earmarked for large scale regeneration.

5) SIL policy needs to be more dynamic and allow opportunities for Enfield to drive higher-wage employment in mixed use developments that would support the Crossrail 2 business case rather than undermine that business case as it currently does

6) Boroughs should be fully in charge of their retail provision.

User: National Grid

We acknowledge that the London Plan must balance the interests of competing land uses and particularly providing sufficient land to meet both housing and employment needs for the period 2016 to 2041.

On this point, it notes that the Mayor is seeking to protect employment land at Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS) by stipulating that there should be no net loss of floorspace at these locations.

However, we note and welcome the fact that:
"… The principle of no net loss of floorspace capacity does not apply to sites previously used for utilities infrastructure or land for transport functions which are no longer required" (para. 6.4.5).

However, for greater clarity it is proposed this exemption is specifically drafted into policies E5 and E6.

National Grid Property has significant landholdings within 'designated' employment areas however they contain no existing employment floorspace and the loss of them to other positive land uses such as housing would not result in the loss of existing jobs. We would like to continue working with the Mayor and relevant London authorities to accelerate bring the sites forward for development. However, we would appreciate greater clarity in the Plan on the level of affordable housing contributions required across former utility sites, but also whether vacant former employment sites, such as former utilities land, are exempt from the no net loss approach suggested.

User: Just Space

Chapter 6 - Economy

Overall comments:

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

User:	Gidea Park and District Civic Society

Local Centres struggle to survive, with competition from “Out of Town Retail” and enhanced Town Centre schemes, improved public transport and cheap/free parking for cars and cycles are required to improve access and also good signage and landscaping. We support your proposals to downsize and encourage change of use as appropriate, including services to encourage community use, but avoid causing problems, (noise, smell, litter, excessive on street parking) for local residents.

User: Business for London

Workspace should be available to social enterprises, I cannot see any other specific support being encouraged in the London Plan to help them. Social enterprises are operating across most sectors and industries and play a significant role in most of the other areas of the plan ie Social Infrastructure, Green Infrastructure and Sustainable Infrastructure.

Inclusion of the further specific support of social enterprises in borough development plans, possibly in the recognition of social enterprise place status or support programmes would go some way to recognise the importance these enterprises have in ensuring an inclusive and fairer London.

User: Association of Events Organisers

I am sure you are aware that in 2014 the Earls Court Exhibition Centre ceased trading, as part of the Earls Court Masterplan redevelopment. This space equated to 16% of the total venue space in the UK, and 30% of the space in London, and whilst certain venues have improved their venues the capacity of London venue stock has not been increased to compensate. This is proving a challenge for my members, who are struggling to launch new events, and maintain the duration of existing events in the necessary time windows for the audiences.

I represent the AEO, the Association of Event Organisers, www.aeo.org.uk, the trade body for organisers or primarily exhibitions in the UK and Internationally. Please find attached a recently published report (SASiE), which shows there are approximately 948 trade and consumer exhibitions in the UK during 2016, a like for like increase of 9.7%. They attract an estimated 8.6m visitors generating a significant local economic impact for businesses in the surrounding areas of the venues.

The exhibitions sector represents over £11bn of the total £39.1bn of the event sector, as described by the Business Visits and Events Partnership, a full report can be found here;

https://www.businessvisitsandeventspartnership.com/research-and-publications/research/category/5-industry-research

I am not sure if you are aware of the Events Industry Board https://www.gov.uk/government/groups/events-industry-board which recognises the significance of exhibitions and events sector and has recently created a working group to look at Infrastructure, as noted below;

- Infrastructure - Understanding venue capacity, occupancy, spare capacity, regional spread, connectivity and transport is an essential part of targeting new international business as well as growing existing activities. VisitBritain is leading on research in this area which presently is confined to England's needs due to being funded by VisitEngland. It was agreed this exercise needed to be Britain wide and discussions would be held with the devolved Nations to see how this could be achieved and that this should form one of the working groups.

I hope that through this group more evidence will be available to support anecdotal comments from my members that there is a shortage of venue space particularly around the Earls Court Area, which is stifling their growth.

As an aside the UK is home to best organisers in the world, and the attached Global Events Study shows just 23 UK based organisers organise over 1300 events globally bringing £1.7bn of turnover back to the UK. The global events industry for our members continues to grow, with overseas revenue now measured at nearly £1.7bn. To put just this International activity into context, this puts the events sector just outside of the top 30 in terms of UK commodity export contributions to the UK economy in 2016, after mineral manufacturers; dyeing, tanning and colouring and inorganic chemical. To add further context, the UK events industry delivers a contribution equivalent to 1/24th of the top ranked sector, mechanical machinery (£40.7bn)2.

Anecdotally other regions of the UK are increasing their venue capacity, such as Farnborough, and there is international investment interest in London, with a number of parties regularly contacting us looking for space to create new exhibition and event venuesparticualrly in the West of London.

I would welcome the opportunity to meet you to discuss the various economic opportunities that this would bring to London, and would welcome reference to the exhibitions sector within the new London plan.

User: Benhill Residents

This chapter adds to our concerns that the draft London Plan policy principally benefits those at the top end (by income) at the expense of those with below median income levels. Policy E11 text, paragraph 6.11.1 expresses precisely the problems: London apparently has a strong global economy, yet its employment rates have lagged behind the rest of the country for three decades. It has particularly high rates of youth unemployment and increasing levels of in-work poverty.

Social / affordable rent tenants and those living in more expensive private rented housing who really can only afford social-rented homes, necessarily suffer most.

User: Elaine Chambers

This chapter adds to our concerns that the draft London Plan policy principally benefits those at the top end (by income) at the expense of those with below median income levels. Policy E11 text, paragraph 6.11.1 expresses precisely the problems: London apparently has a strong global economy, yet its employment rates have lagged behind the rest of the country for three decades. It has particularly high rates of youth unemployment and increasing levels of in-work poverty.

Social / affordable rent tenants and those living in more expensive private rented housing who really can only afford social-rented homes, necessarily suffer most.

User: Earls Court Public Sector Tenants' Assoc

This chapter adds to our concerns that the draft London Plan policy principally benefits those at the top end (by income) at the expense of those with below median income levels. Policy E11 text, paragraph 6.11.1 expresses precisely the problems: London apparently has a strong global economy, yet its employment rates have lagged behind the rest of the country for three decades. It has particularly high rates of youth unemployment and increasing levels of in-work poverty.

Social / affordable rent tenants and those living in more expensive private rented housing who really can only afford social-rented homes, necessarily suffer most.

User: Silvertown Homes

Providing low-cost space, affordable business space and smaller industrial space

The draft London Plan is vague. Applicants should ‘consider’ providing low cost space, ‘may’ seek affordable workspace and should ‘consider’ the scope to provide smaller (sub-2,500 sq m) industrial space. No clear detail is provided on appropriate ratios for the above and with low-cost or affordable space on rents to be charged. This will not help good decision-making.

If the draft London Plan is to address these matters then its policies must either provide clear guidance or explicitly leave this matter to be addressed by Boroughs individually.

User: John Lewis Partnership

Summary and key recommendations

- **The principle of ‘no net loss of industrial floorspace capacity’ does not go far enough.** Too much logistics and industrial land has been lost over the years. London’s growing population will increase demand for deliveries and servicing activity and therefore land needs to be in place to support this. The principle of ‘No net loss of industrial *floorspace*’ is not the same as the same as ‘no net loss of *land*’ and relies too much on intensification. For logistics, open land and vehicle storage areas are required. In addition, it only applies to *designated* industrial land which is just 64 per cent of industrial land meaning that 36 per cent is at risk. The base level of industrial land is low already, but capacity needs to be in the right geographical area.

User: North London Waste Plan

E policies	Noted that E4 Land for industry, logistic and services to support London's economic function includes the need for waste management within the policy. Noted that waste uses continue to be supported under E5 SIL and Table 6.3 identifies the SIL sites for each borough which under this policy are considered suitable for waste uses..

User: Persimmon Homes

We share the HBF’s concerns that this Chapter place far too much onus on residential developers to address London’s employment space issues and places policy hurdles that could render development unattractive, unviable or unduly complex. This will not assist in terms of meeting the national and London imperative of boosting housing supply.

We concur with and support the HBF’s comments in relation to the following policies;
Policies E1: Offices
Policy E2: Low-cost business space
Policy E3: Affordable workspace
Policy E4: Land for industry, logistics and services to support London’s economic function
Policy E5: Strategic Industrial Locations
Policy E6: Locally Significant Industrial Sites
Policy E7: Intensification, co-location and substitution of land for industry, logistics and services to support London’s economic function
Policy E11: Skills and opportunities for all

User:	North London Waste Authority

The draft LES indicates the Mayor's desire to encourage the establishment and growth of businesses in the low carbon and environmental sectors, and a vision for a low carbon circular economy. NLWA recommends that the NLP therefore includes details of the low carbon circular economy sector which the Mayor explicitly wishes to support. The London Waste and Recycling Board (LWARB) might be the right body to lead on working closely with borough regeneration staff to develop these sectors within the capital.

User: London Sustainable Development Commission

The LSDC strongly supports the inclusion of Policy E8 on sector growth opportunities and clusters. However, the commission is concerned that this policy does not go far enough in supporting the CleanTech economy in London.

The commission is concerned that the current definition used for CleanTech within the draft London Plan results in a missed opportunity for the better integration of CleanTech with other policies. In particular, the definition should be revised to make clear that CleanTech is not a 'sector', but a direction for all economic activity becoming more sustainable, which would better reflect its role in the low-carbon economy.

The commission strongly supports the development of a CleanTech cluster in West London, and considers that the London Plan does not go far enough in supporting this opportunity. London's CleanTech economy is the largest in the UK, however currently has no clear voice, is spatially fragmented and does not benefit from the accelerated growth rates associated with clustering. If London is to achieve the Mayor's target of a zero carbon city by 2050, then opportunities surrounding CleanTech need to be harnessed more effectively, and in a more integrated way.

More specifically, the commission considers that there should be greater urgency surrounding the promotion of a CleanTech sector in West London, capitalising on the unique opportunity the development offers, and acknowledging the relatively limited timescale for establishing London as a market leader. Support for this cluster of future oriented, environmental enterprises will help London transition to a more resilient and sustainable economy.

The LSDC has already undertaken extensive research surrounding the role of CleanTech and published the report '*Better Future: A Route Map to Creating a Cleantech Cluster in London*'[1], outlining evidence supporting the proactive development of the CleanTech sector in London. Drawing upon this evidence, it is recommended that the London Plan includes a specific policy on CleanTech clusters, using the text outlined on Page 254, entitled 'low carbon and environmental goods and services sector'. The policy should include reference to:

- Imperial College's new innovation campus, where CleanTech innovation will be a key focus.
- Old Oak Common where HS2 and Crossrail will create fast connectivity between the CIC, the rest of the UK, the City and the rest of the globe via Heathrow.
- A more dense provision of business facilities at Park Royal to create space for CleanTech business on a scale equal to Silicon Valley.

The policy needs to explicitly reference the approach to supporting growth across London's CleanTech sector, as set out in the Economic Development Strategy for London[2]. For example, the EDS sets out ideas for developing this opportunity in West London, including creating a Centre for CleanTech innovation, and exploring the potential to provide an early stage manufacturing facility to enable firms with potential to prototype innovations. Reference to this strategy, along with other measures such as the provision of affordable workspace and meanwhile uses, will help to articulate what the Mayor and the planning system can do to support the CleanTech economy. Although uses are referenced within the context of housing (Policy H4), explicit reference to the role of meanwhile uses should be made in relation to CleanTech. Similarly, reference to CleanTech should be added to Policy E3: Affordable workspace, as a measure to support this emerging economy. These amendments to the Policy will support an approach that is more directive in creating a CleanTech cluster, as opposed to assuming it will develop organically.

In a similar vein, the LSDC strongly supports aligning opportunities in the CleanTech economy with the Mayor's ambitions for the intensification of Strategic Industrial Land. The CleanTech economy lends itself particularly well to industrial floorspace, and can capitalise on intensification opportunities. There are positive links to be made/ encouraged between Clean Tech and opportunities for SIL intensification, and therefore CleanTech should be explicitly referenced within Policy E5: Strategic Industrial Locations.

Recommendations:

- A specific policy supporting a CleanTech cluster at Old Oak Common and Park Royal.
- Use the following definition of CleanTech - "products and services that avoid or repair harmful effects on the environment caused by human activity".
- Policy E8 should better articulate the Mayor's role in supporting the CleanTech economy in line with supporting strategies such as the London Economic Development Strategy.
- Explicit reference to opportunities surrounding CleanTech in Policy E5: Strategic Industrial Locations.
- Specific reference to CleanTech in Policy E3: Affordable Workspace.

[1] http://www.londonsdc.org.uk/documents/LSDC_BetterFuture_March2016_FINAL_revised.pdf

[2] Economic Development Strategy for London (2017), Innovation and growth across London's CleanTech sector, P. 165 - 166

User: Culverley Green Residents' Association

Protection of Employment Land and encouragement of small and medium sized enterprises.

The general thrust of the policies is laudable, including trying to protect important last mile distribution centres and recognising and trying to protect areas used by the creative and small tech companies but the diagrams for how to build on the parking areas of industrial estates to get more housing are laughable, does anyone in City Hall really want to live in a one bed flat with two kids while looking at the side wall of a multi storey block of industrial units with ramps for lorries to access the upper floors a few metres from their front windows because of course no one is protecting outlook, privacy, noise or even daylight or sunshine any more as long as the ‘design’ is high quality. Get a grip and get some common sense into your thinking.

User: Northwoods Voice Limited

Chapter 6. Economy.

NVL fears that further increased densification and the likely provision of new retail outlets such as perhaps being indicated in the Draft London Plan and perhaps in future TfL plans for their Green Lane Conservation Area estate will be likely, in our opinion, to suck commercial investment and activity away from the rest of the Town and lead to an emptier high street elsewhere in the Town centre.

User:	Historic England

The historic environment makes a major contribution to London's economy in many ways, including the contribution it makes to the positive image of London and the quality of life its historic places and neighbourhoods bring. These aspects are touched on in policy GG5 and para 1.4.9 which we welcome. The Government's recent *Heritage Statement* recognises this broad contribution, which is also well evidenced in Historic England's Heritage Counts publications on *Heritage and the Economy 2017.*

The broad numerical evidence is exemplified through case studies from around London in our publication *Translating Good Growth for the Historic Environment*.

User: Dr Jessica Ferm

This chapter of the draft London Plan is a huge step in the right direction and I would like to commend all the important work done by officers in getting to this stage. Importantly, it moves away from the previous policy of managed decline of industrial land, which is welcome. It aims to take a harder-line approach through the introduction of a 'nil net loss' stance. It suggests that not all industrial activity needs to take place on parcels of land separated from the urban fabric and seems to want to move towards a vision of a more integrated city. However, the pressure that the London Plan is under to deliver capacity for housing, as well as protect green space/green belt, is all too evident here and it is clear that industrial land is where much capacity is being sought – through the new co-location policy and through the small sites policy in the housing chapter (and exemption of non-designated industrial sites from the nil net loss stance). In seeking to find a win-win solution, my concern is that London will – in fact – continue to lose industrial sites at an alarming rate. If the nil net loss policy is weak or difficult to enforce, then the co-location policy will quickly serve to facilitate the loss of industrial land to residential or rather bland mixed-use development, with no real capacity for industrial occupiers. The evidence so far suggests that the on-going loss of industrial land is being driven largely by real estate speculation rather than deindustrialisation (Ferm and Jones, 2015, 2016a).

Local authorities have been experimenting with 'mixed use' designations on sites previously protected (as SIL or LSIS) for a while. The outcomes to date have been worrying, resulting in residential development with a few scraps of commercial space (but certainly not suitable for industrial occupiers). My research (with Ed Jones, 2016a) looked at two London local authorities (Camden and Lewisham) as case studies and found that despite planning policies that include guidelines on the % of employment upon redevelopment, these policies appear to have been difficult to implement/enforce. More specifically:

- In Camden, despite very low vacancy rates in the industrial stock and high demand from businesses that require access to central London markets, the Council has de-designated its one remaining industrial area in Kentish Town for redevelopment. This was not part of an Opportunity Area designated in the London Plan, but was designated as a 'growth area' in the new Local Plan. Our research showed that there were three drivers for this shift in policy with respect to the borough's remaining employment land: A substantial increase in the borough's annual housing targets; a political commitment to selling off Council owned industrial sites as part of a borough-wide Community Investment Programme; and establishment of a resident-led Neighbourhood Forum and Plan in the area where most of the borough's remaining industry is concentrated.

- In Lewisham, between 2000 and 2012, the borough lost 32% of its industrial floorspace, from 568,000 to 386,000 sq m[1] - substantially more than the average for London (17.3%) and East London (19.7%) (LB Lewisham, 2013a). This is despite a planning policy framework designed to safeguard employment sites during this period. In 2008, consultants preparing the borough's employment land study found that "while the Borough's commercial property market is failing to create suitable new stock, choice for occupiers is shrinking and a spiral of decline is evident in which it will lose critical mass as a business location – if it has not already done so." (ibid, 37). Similarly, the Lewisham Business Growth Strategy suggested that a lack of premises is a key weakness for the borough (LB Lewisham, 2013a: 18). However, in the Core Strategy (LB Lewisham, 2011: Policy 4), seven of the 23 Defined Employment Areas in the 2004 planning framework were given a new *Mixed Use Employment Location* (MEL) designation, whereby only 20% of the floorspace is required to be in employment use (LB Lewisham, 2011: Policy 4). Our analysis of these seven MELs shows that all bar one of these sites were being redeveloped under a single planning application, with housing as the primary focus. In some cases, the employment floorspace lost is offset through intensification with non-residential floorspace, but none of this floorspace is proposed for industrial use, suggesting a change in nature of the jobs to be accommodated.

Local authority planners in London are now operating in a national policy and political climate that is increasingly moving towards deregulation with a presumption in favour of development, but changes in planning policy at the local level are going beyond that required by national or regional policy guidance. The pressure on planners to meet ever-increasing housing targets is evident, but in the case of Camden it appears that the context of austerity politics, coupled with the increasing influence of local residents through the Neighbourhood Planning process, has served to weaken planners' previous stronger position on protecting remaining employment land. In Lewisham, justifications for the borough's planning policies have long referred to the need to support regeneration, but whereas employment was previously understood to be one of the fundamental building blocks, there has been a shift towards a housing-led approach to regeneration, whereby the release of industrial sites is key to delivering housing targets. Thus housing is now seen as part of the package of support for economic growth, required to attract skilled workers in high-growth sectors, which supports an economic growth agenda at a London scale, rather than a local one.

Early indications suggest that the approaches being taken in Camden and Lewisham are unlikely to deliver any substantial employment within the mixed use redevelopments facilitated by policy. Planning policy on its own is failing to deliver the mix of uses that could meet such aspirations. Arguably, pressures to meet housing targets mean there is little political will to enforce requirements for developers to deliver employment at the expense of more housing. Merely designating a site as 'mixed use' is unlikely to deliver mixed use in practice. Ironically, as local authorities are busy trying – and failing - to increase mixing through the deregulation of parcels of employment land, we are at the same time losing the fine grain of mixing that has been a natural feature of the city, a consequence of failed 20th Century attempts to remove non-conforming uses from residential areas and town centres.

So, the London Plan should not be over-optimistic in assuming its policies will be easy to implement at the local level, and wherever possible, it should be careful to not unintentionally facilitate further real estate speculation and rising hope values.

In addition, I believe it would help enormously if the London Plan could be **more visionary** in its approach to the subject of industry in London. The current tone is more reactive than proactive, and the language used suggests a rather limited function for industry (supporting the wider economy, rather than being an integral and important part of the rich and diverse economy we have).

As we argue in Ferm and Jones (2016b), industries that remain in London do so because they have close ties to their markets, other businesses in the supply or co-production chain, and labour. Niche manufacturers are much more reliant on being close to their markets, with access to skilled labour, driving agglomeration rather than dispersal. In new urban manufacturing there is now a closer symbiosis between production and design, research and development. This relies on access to skilled labour, which is more readily found in cities. Conversely, we make the argument that cities also need industry, to keep the city functioning to process its waste, to provide materials for its construction, and so on. Moving these essential functions further out has implications for efficiency as well as carbon emissions and environmental sustainability as the length of business-to-business trips increases. Although goods can be imported, demand from the city's businesses and residents are moving away from mass-produced goods towards more bespoke and 'just-in-time' products. The line between manufacturing and services is blurring as businesses increasingly bundle together goods and services to meet such demand. Retaining manufacturing and industry in cities also helps the city to be more diverse, and therefore more economically and socially resilient, making for a more interesting and vibrant city.

There is an opportunity here for the Mayor to adopt a strong leadership role. This will require looking beyond planning policy and striving for real leadership to bring together developers, landowners and businesses, not only exploring a range of design options for integrating industry with housing, but also alternative models for the ownership and management of land and premises which allow existing businesses to have a far bigger stake in their future.

[1] From Valuation Office Agency data, available at http://data.london.gov.uk/dataset/commercial-and-industrial-floorspace-borough

User: Mr Gary Hayes

This chapter adds to our concerns that the draft London Plan policy principally benefits those at the top end (by income) at the expense of those with below median income levels. Policy E11 text, paragraph 6.11.1 expresses precisely the problems: London apparently has a strong global economy, yet its employment rates have lagged behind the rest of the country 15 for three decades. It has particularly high rates of youth unemployment and increasing levels of in-work poverty.

Social / affordable rent tenants and those living in more expensive private rented housing who really can only afford social-rented homes, necessarily suffer most.

User: Andrea Carey Fuller

This chapter adds to our concerns that the draft London Plan policy principally benefits those at the top end (by income) at the expense of those with below median income levels. Policy E11 text, paragraph 6.11.1 expresses precisely the problems: London apparently has a strong global economy, yet its employment rates have lagged behind the rest of the country for three decades. It has particularly high rates of youth unemployment and increasing levels of in-work poverty.

Social / affordable rent tenants and those living in more expensive private rented housing who really can only afford social-rented homes, necessarily suffer most.

User: Mill Hill Neighbourhood Forum

We are pleased to see that you are supporting the retention of designated Industrial Areas. We like to refer to them not just as Industrial Areas but as “job creation areas” and the one in the centre of Mill Hill we wish to retain and expand to offer opportunities to notably start-up businesses and those who fulfil a vital, if less glamorous function/service, within our community.

We thought that the current London Plan was too Central Zone centric when it came to employment and many past-times. We welcome a more Polycentric London. We need employment locally, and not simply in low level service roles but professional & managerial roles. The Medical Research Centre moved to Kings Cross recently with the loss of more that 1000 jobs from our local economy. It is of concern that Barnet does not have a single Footsie 100 Company headquartered within its area. The only major business headquarters is McDonalds. Many businesses do not need to be in Central London paying rents of £80+ per square foot. They could operate as effectively in Mill Hill where rents are £25-30 per square foot, where their staff would be able to be housed without the need for a long commute and on an occasion when a trip to see a client in Central London is required it could be accomplished in 25 minutes. We would like to see more pro-active measures in the new London Plan to encourage larger businesses to locate to our fine suburb.

We are also concerned that the DLP suggests a single solution to the development of any space near a transport hub; it should be residential. We do not support this in the specific of Mill Hill’s Town Centre which is close to Mill Hill Broadway Mainline Station. As a consequence of recent growth, parking in and around the high street is a nightmare which detracts many from bothering to shop locally. In our Neighbourhood plan we designate a site (currently a surface car park for 180 cars, owned by the Council) for development of a 150 Bedroom hotel & conference centre with 400 car park spaces & 250 cycle spaces in multi-story facility and a developer is very interested in building such. Further we want to have a two-screen cinema in the Town Centre. These amenities will bring real value to our local economy, reduce travelling and bring greater cohesion amongst the community. Such developments will revitalise our Town Centre and make it a magnet for better shops and restaurants, as a popular destination for local people and those from surrounding areas. We notice that you are proposing to create new Town Centres to support new developments. We are doing everything in our power to encourage investment to revitalise our Town Centre for the benefit of all. We hope we will have your support?

User: Camden Town Unlimited and Euston Town Business Improvement Districts

London is facing considerable business capacity challenges in the coming decades. Projections suggest there will be an increase of 619,300 jobs by 2041. This could translate into demand for between 4.7 and 6.1 million sqm of office floor space over the period 2016 to 2041. Within the Borough of Camden, as is the case for much of inner-city London, the affordability of housing and workspace is a major issue which threatens to constrain future economic growth and increase unaffordability and disparity in the area.

We represent initiatives involving the use of ‘meanwhile space’ where land earmarked for development can be temporarily turned into a co-working environment. The BIDs therefore welcome the policies contained within the draft London Plan which would represent a major step forward in the policy framework to support the provision and protection of both affordable and low cost workspace and will have a significant positive impact.

The evidence of the benefits of meanwhile use are well-established, that being surrounded by like-minded, talented individuals and teams really benefit creatives in the short and long term, giving them the opportunity to build their network and share vital skills and experience. We therefore fully support the intention of policy E8 C as flexible and affordable workspace is critical to supporting the start-up economy, and should be at the heart of ‘making the best use of land’.

Whilst we support the intention of much of chapter 6, there is far more detail required to ensure the vision is progressed. The chapter sets out a framework with a number of qualifying points which require clear and firm definitions, without which local pressures may result in the inconsistent application of strategic principles. We will now assess specific recommendations from the Plan.

User: Camden Town Unlimited and Euston Town Business Improvement Districts

Finally, there are a number of factors that could inhibit the economic and social potential of our local area. These fall within the proposed London Innovation District boundaries we outlined at the start of this consultation response.

Using the Index of Multiple Deprivation (IMD), of the 17 small areas which make up the proposed LID, only 2 score above average in terms of deprivation, the remaining 15 areas are within the top 30% most deprived areas in the country.

Whilst all inner-city locations tend to score poorly on both crime and living environment, LID scores particularly badly. Indeed, 8 of the local areas within the LID are in the 10% most deprived areas for crime, with a further 4 in the bottom 10-20%. Similarly, 8 of the local areas are in the 10% most deprived areas for living environment, while a further 6 are in the bottom 10-20%.

The proposed LID already hosts a truly diverse range of businesses. However, we are keen to ensure that vision outlined in the draft Plan – “to provide the best environment in the world in which to do business, so that businesses of all different sizes and sectors can reach their growth potential” – is fully realised.

More emphasis needs to be on improving specific areas where the IMD reflects that the LID is performing particularly badly in contrast to other local areas. As described above, these areas include crime, living environment and employment.

Against the backdrop of public funding cuts, one solution to help provide the funding to help support improvements in the area is a Tax Increment Funding (TIF) scheme.

Research prepared by Volterra Partners shows that a TIF would capture incremental increases in business rates in the LID to fund projects which are essential to the area, supporting future growth.1

That borrowing would then be repaid by future uplifts in the business rate base of the area. One of the prerequisites of a TIF is that the area in question has to be where substantial business rate growth is a realistic prospect. For the LID, there is significant growth planned in the area.

It is estimated that 4,700-5,600 additional jobs will be supported within the LID through developments already completed and under construction and a further 5,500 jobs are likely to be accommodated in future through permitted/proposed development. This would represent a 16% increase in employment and between £0.7bn and £0.8bn in additional GVA per year.

The Mayor of London should therefore commit to reviewing the potential for a TIF to increase and improvement within a defined area, especially where there is clear evidence of need but also the potential for significant future economic growth. Both are the case in the LID.

User: Prologis

The main points of these representations with respect to the Draft London Plan are as follows:

- Strong support for the policies within Chapter 6 *Economy* that relate to industrial and logistics land and premises (Policies E4 to E7), particularly the process of substitution to ensure that industry and logistics is located optimally;
- The effectiveness of these polices is undermined by setting the affordable housing threshold at 50% in Policy H6 of the Draft London Plan, as this will prevent the delivery of development to consolidate land for industry and logistics.
- In order for the process of substitution to be effective Draft London Plan should allow boroughs flexibility to review Green Belt boundaries, through the development plan process in accordance with the NPPF, if exceptional circumstance exist.

Overall Approach

Prologis welcomes the recognition that industry and logistics play a vital role in the effective functioning of London's economy. They broadly support the principle of no overall net loss of industrial floorspace capacity across London in designated SIL and LSIS. They welcome the support for intensification of industrial and logistics uses and support the processes set out in the Draft London Plan of intensification, co-location and substitution to make best use of land for industry and logistics. They recognise that housing delivery must increase substantially if the new housing targets in the Draft London Plan are to be met and consider that consolidation of land for industry and logistics can play an important role in this.

With this in mind Prologis strongly support the policies within Chapter 6 *Economy* that relate to industrial and logistics land and premises (Policies E4 to E7). In particular they consider that substitution can ensure that industry and logistics is located optimally. However, they consider that as drafted other policies within the Draft London Plan will prevent these policies from being effective in ensuring sufficient and optimally located supply of land for industry and logistics as well as delivering new homes. These polices relate to affordable housing and Green Belt, which we shall set out below.

User: Halfords Limited

Large Format Retailing in London – Current Trends

4.1 Recent years have seen the significant erosion in the quantum of retail warehouse floorspace within London, much of which has been supported by the decisions of the Mayor. Whilst we are aware that this has enabled the delivery of a range of residential schemes it has been allowed to occur, almost in its entirety, without consideration of the implications of the loss of the pre-existing retail warehousing. Quite simply the Draft Plan does not *'…set policies for the consideration of town centre uses which cannot be accommodated in or adjacent to town centres* ' as required by the NPPF. The plan is therefore unsound in this regard.

4.2 There are countless examples of retail warehouse parks and solus stores being sold by landowners to residential developers (for considerable sums) to be redeveloped for residential development. Halfords are not able to compete with the sums being offered by residential developers, housing associations and local councils in bidding for store freeholds. A consistent theme of such transactions is to enable the provision of high-rise residential development with some ground floor commercial uses (including within Class A1), however due to the footprint size of such residential towers there is insufficient floorspace for the re-provision of large format retailing. A further factor that precludes large format retailers from accessing such development is that it is almost exclusively provided without any car parking, which is essential to the sector to enable the transportation of bulky products. This particularly affects Halfords, whose business model incorporates on-site diagnostics and the fitting of vehicle parts on-site (their 'We Fit' service).

4.3 We are only aware of one case study where a bulky goods operator (Travis Perkins) own a freehold and redeveloped a store, this being at 11-13 St Pancras Way, NW1 OPT. Camden Council approved (planning application reference 2011/1586/P) an application[2] in September 2013 for the redevelopment of the existing builders' merchants. Travis Perkins and Unite Group were the joint applicants for the application, which was submitted in March 2011. Halfords understands, through discussions with other retailers, that the GLA are using this as a case study in promotional material as to what can be achieved. It should be noted that Travis Perkins were only able to a deliver a store suitable to them only because they owned the land. The market would not have delivered that scheme – They would have resisted the nature of a builders' merchants' operation because it would have reduced the value of the uses above.

[2] "Erection of part 6, 7, 8 and 10 storey building comprising 3,657 sqm builders merchant (Class Sui Generis) at ground and part mezzanine level and 563 student bed spaces (Class Sui Generis) with ancillary student facilities to the upper floors."

4.4 Halfords are keen to point out that Travis Perkins' acquisition of the freehold of the site occurred prior to the market shift towards residential developers acquiring such sites at significantly inflated sums. In the current climate, retail warehouse operators are being consistently (and very significantly) outbid by residential developers, housing associations or local councils who then have the power to choose whether they are willing to re-accommodate pre-existing tenants. From Halfords' experiences this is generally something that residential developers/landlords are unwilling to do as they can achieve a higher return on alternative land uses or on smaller ground floor retail floorplates which is not suitable to the retail warehouse sector, even when accounting for flexibility in format and scale.

4.5 The following therefore provides some case studies as evidence that retail warehouse floorspace is being lost across London. We consider this should form part of a new evidence base for the Draft Plan. There are likely to be other examples which ought to be taken into account.

• **Hurlingham Retail Park** (Currys and PC World – totalling 4,778 sq.m) next to Putney Bridge (SW6) for which permission was granted by the London Borough of Hammersmith and Fulham (in 2014) for 239 residential units. Here the replacement retail floorspace is being provided in six small units. Overall there is a significant loss in the quantum of A1 floorspace. Dixons Carphone's Senior Asset Manager confirmed to us by email (26th February 2018) that they will not be re-accommodated in the development.

• **B&Q, Smugglers Way** (SW18). Planning permission was granted by the London Borough of Wandsworth in January 2018 for the demolition of the store (6,308 sq.m) and the development of 13 residential blocks. In its Case Report, the GLA commented that the existing retail floorspace is not offered any protection, therefore justifying its loss. There was no consideration as to the implications of the specific loss of large format retail floorspace. The A Class floorspace to be provided within the 13 blocks would be incapable of accommodating B&Q or other large format retailers.

• **Homebase, Swandon Way** (SW18). An application (recommended for approval to committee in January 2017) is with the London Borough of Wandsworth for the demolition of the existing store (6,309 sq.m) and redevelopment to provide 13 residential blocks. As with the B&Q on Smugglers Way a replacement large format store could not be accommodated within the redevelopment. As with Smugglers Way the GLA 's Case Report identify that the existing retail floorspace is not protected and give no consideration as to the implications of the loss of the particular format of retail floorspace. Likewise, within the Council's committee report the loss of the retail floorspace was not identified as an issue.

• **Homebase and Argos, Western Avenue, Acton** (W5). This site has recently been sold to Barret for residential development of 350 residential units.

• **B&Q Chiswick Roundabout** (W4). This site has been sold and is subject to public consultation (an application is yet to be submitted) for high-rise residential development with limited small-scale town centre uses to be known as Hudson Square.

• **Cantium Retail Park, Old Kent Road**. This site accommodates Halfords, B&Q and Pets at Home and has been sold to Galliard Homes to develop 1,000 homes in 3 high-rise blocks. There has been a wider significant erosion to the stock of retail warehousing on Old Kent Road for residential development.
It should be noted that the landlord, Aviva Investors, has positively engaged with Halfords with a view to re-accommodating them into the scheme; however, even when accounting for significant flexibility in terms of replacement store size and operational requirements (parking, servicing etc) the replacement floorspace is unsuitable for Halfords. We understand that the other retailers affected are also incapable of being re-accommodated.

• **Pentavia Retail Park, Barnet**. A current application is before The London Borough of Barnet for the demolition of the retail park (9,053 sq.m of retail floorspace) and redevelopment to provide 717 residential units (in 18 blocks up to 14 storeys) plus small-scale ancillary town centre and community facility uses. The replacement A1 floorspace will not be capable of accommodating large format retail warehousing and is not designed to do so.

Homebase, Warwick Avenue, Kensington. Planning permission was granted by The London Borough of Kensington and Chelsea in 2012 for the demolition of the store and provision of 243 residential units, C2 uses and 430 sq.m of small-scale ancillary town centre uses.

• **Halfords, Balham and Halfords, Wandsworth**. The landlords for these two stores have sold the sites for residential development for the provision of significant residential blocks. Halfords are unable to be re-accommodated into the redevelopment schemes.

• **Halfords, Mile End Road**. The store, along with Asda and Currys form Anchor Retail Park. All occupiers would like to extend their leases but Lothbury, the owners of the site, are presently working-up residential plans for the site.

• **Wickes and Halfords, Uxbridge**. These two retail warehouses at Harefield Road are currently under offer with contracts exchanged with a housebuilder for residential redevelopment. Both occupiers are aware that the landlord wants vacant possession in September 2019, when their leases come to an end. However, both Wickes and Halfords wanted to extend their leases for at least 15 years.

• **Halfords, Catford**. Despite having a lease in place until 2024 Halfords have been approached by a number of residential developers, including the existing landlord, enquiring as to whether Halfords would vacate the property earlier with an incentive to enable a residential redevelopment to go ahead.

• **Lewisham Retail Park**. A planning application is under consideration for the demolition of the retail park and its redevelopment to provide 536 residential units as well as some commercial units, including retail floorspace. Having reviewed the submitted DAS, the commercial units proposed would not be of sufficient size to accommodate large format retailing.

• **Wickes, Hanwell** (W7). A planning application was recommended for approval by The London Borough of Ealing in January 2018 (subject to completion of a Section 106 agreement and referral to the Mayor) for the demolition of the store and a car dealership (Wickes floorspace being 3,227.4 sq.m) and redevelopment to provide three blocks containing 283 residential units and 428.3 sq.m of ground floor retail. The part of the site where Wickes are located is allocated as Town Centre. The Committee Report identifies that the Stage 1 Mayor referral offered support to the principle of the development due to the qualitative improvements to the retail floorspace. In justifying the significant loss of retailing, the report identifies that there will be an “improved” retail offer. There is no mention of the loss of the particular format of retail, which is incapable of being re-established in the development.

4.6 Quite clearly there is a continuing trend of housebuilders targeting retail warehouse premises for high-density high-rise residential accommodation. Halfords consider that this is something that the evidence base should have been alive to and addressed.

4.7 Whilst many of these emerging schemes incorporate some replacement retail floorspace this is aimed at serving those retailers who are not reliant on large format flooring, with associated parking and servicing arrangements. Halfords have actively engaged with their landlords where such schemes are emerging on sites where they are accommodated, but the floorspace offered is consistently insufficient and incompatible with their business model.

4.8 We are only aware of one retail park coming forward3, Brocklebank Retail Park in Charlton. However, this certainly does not compensate for the loss of retail warehousing across London. Apart from the Hanwell example, which is a solus store, we are not aware of any retail warehousing being protected in any London borough local plans (despite considerable market demand). This makes existing sites even more attractive to residential developers, but also highlights that boroughs are not being proactive in planning for this specific type of town centre use. These factors, combined with the wording of draft policies SD8 and H1 and the upsurge in the residential market targeting such land, does not bode well for the future of the retail warehouse sector within London.

User: Federation of Enfield Residents & Allied Associations

1. **Distribution of low skilled migrants:** There is every incentive to direct public policy to deter large accretions of low skilled residents in London suburbs, there being no long term economic reason for large numbers to avoid the obvious benefits of moving to lower cost areas of the UK. The presumption that anyone has a right to live in London and be subsidised if unable to afford it, is unsustainable. Assisting relocation out of London should be considered on economic grounds.

User: Gail Waldman

1 CONTEXT of ECONOMIC CHANGES

1A - scale of change and factors

1A.1 We agree that 'London is not an Island' and we note the 'extensive and complex network of centres…..as a whole….comprise the most productive region in the UK accounting for nearly half its output and making by far the biggest net contribution to the national exchequer .' (2.2.1)

1A.2 We consider that over the Plan period of 2017 to 2041 economic changes will transpire which will change the planning requirement across the UK equivalent to the changes that took place during the Victorian era.

1A.3 Identifying factors which influence economic prosperity and demographic projections is essential but interpretation in a number of (potentially conflicting) ways by different analyses needs to be avoided. Using community and social justice methodology would be essential to achieving a pan-UK balance.

1B - **political and trade realignments?** (Europe, Asia, America, etc.)

1B.1 Brexit will affect financial services and manufacturing sectors in ways which at the time of consultation are unknown. By building from local communities, these uncertainties can be better managed.

1C - **community values and social justice**

1C.1 Community values and social justice should be key reference points for all economic factors and change

1D - **future of work with Artificial Intelligence**

1D.1 We are mindful that the developments in Artificial Intelligence will most likely result in loss of employment in the Regions but an increase in employment in the South-East. This needs to be pro-actively addressed.

User:	National Grid

On the economy (chapter 6) we welcome the Mayor’s recognition that the no net loss of employment floorspace does not apply to sites previously used for utilities infrastructure (para. 6.4.5). However, submissions are made to the effect that this should be specifically set out within the draft employment policies (specifically Policy E5 SIL and Policy E6 LSIS.

User: Home Builders Federation

Chapter 6: The Economy

The various policies in this Chapter place far too much onus on residential developers to resolve London's employment space problems with the inevitable competition for land that results from this. The level of detail and conditions all these policies impose on residential development will either render development very unviable or else result in lengthy negotiations as applicants and the LPA and the GLA debate over what will have to be dropped to ensure an implementable scheme.

Residential developers generally are not expert at building and managing employment space, but this is what the London Plan now expects. Only the largest PLC housebuilders may prove capable of doing this, but even this will be costly for them. It will result in prolonged negotiations with the Boroughs and the GLA. This will soak-up money that should be directed towards supporting other more vital planning objectives, such as providing more affordable housing and it conflicts with the Agent for Change principles that the Mayor now wants embedded in the London Plan.

On the whole, the policies in this chapter are wholly unrealistic and will prove ineffective in either protecting and enhancing employment space or supporting the delivery of housing. This is over a period when overall housing supply will need to double.

Chapter 7 Heritage and Culture

User: Mr Daniel Willis

Heritage without a community?

Community Links welcomes the Mayor's emphasis on the importance of heritage, culture and local identity in the new Plan. Our own headquarters at 105 Barking Road has a rich history as a site where key figures from the East End's labour movement, including Sylvia Pankhurst, Daisy Parsons and Will Thorne, made speeches in the late nineteenth and early twentieth century. The building has had previous lives as a theatre and town hall, but for almost 30 years has been home to Community Links' youth, employability and advice services. We are now working hard to further repurpose our home to be a digitally inclusive community hub for the 21st century and believe that the Mayor would be very interested to see the work we have also done in preserving, and enhancing, the building's rich heritage.

Nonetheless, we would like to reiterate our concerns to the Mayor about the prospect of our local community being displaced or disrupted by the housing and retail intensification projects envisioned in his new Plan. For over a century, 105 Barking Road has been a focal point for the local community in which low-income families have socialised, sought help and organised to amplify their collective voice. Since Community Links has been in residence, the building has also become a lighthouse for marginalised BAME communities seeking advice and support in troubled times. Over the past few years, the need for these services has increased greatly.

What would it mean for the history of our building, and for Newham's heritage, if local communities are displaced from their homes and support networks in the borough? What is the purpose of preserving the architectural heritage of 105 Barking Road, as a superficial façade of community, if the families who form the deep roots of our community are forced to leave the area? And how can the Mayor's strategy preserve the most diverse element of London's vast cultural heritage, its people, whilst redeveloping the space in which they live?

User: London Legacy Development Corporation

Heritage and culture

The approach set out in this section of the draft Plan reflects the approach taken by LLDC in terms of the role attributed to heritage in place making. Delivery of new facilities as part of the Culture and Education District will support the existing cultural infrastructure within Queen Elizabeth Olympic Park, and significant work is being undertaken in Hackney Wick and Fish Island to retain and develop cultural and creative industries under the Hackney Wick Central Masterplan. We are exploring the potential to designate a Cultural Enterprise Zone in this area through the Local Plan review. While we welcome the emphasis on developing the night time economy in the capital, it is important to ensure that this is managed in a specific and local way in order to meet the needs of existing or planned new residential communities.

User:	The Access Association

There needs to be more encouragement for accessible night life, pubs etc. etc. and the mayor should be doing more to encourage this and to promote accessibility to these facilities. The Equality Act 2010 has done little to enhance access but the Mayor could lead on promoting accessible venues. Consideration could be given to an ‘Accessible London is open for business’ that promoted accessible venues in London.

User:	Central Acton Neighbourhood Forum

This policy is absolutely crucial at a time of rapid population growth. Our concern is that it has not been and will not be observed. Almost every site that becomes available is given over to new housing. Social infrastructure in all its forms is not keeping pace. With an average occupancy rate of 3 people per new dwelling unit, the Borough of Ealing's population of Ealing will grow over the next 10 years by 84,000 people – roughly the equivalent of present day Stevenage. New towns like Stevenage were carefully planned in terms of infrastructure provision, but not in Ealing.

User: On behalf of the London Culture Forum- Heritage and Culture Network for London borough officers

The London Culture Forum's response letter to the London Plan

Introduction

The latest London Culture Forum (LCF) event was held on 22 February at London Councils. The theme of the event discussed the role of culture in place and planning. This letter serves as a summary of the event and a snapshot of the discussions that were facilitated on the day.

This response to the London Plan consultation provides a summary of verbal feedback captured during the recent LCF event. The feedback of attendees was recorded by members of the LCF Advisory Group. The feedback and views expressed in the Forum session are not and should not be attributed to the position of London Councils, The GLA, Arts Council England or any other organisations to which the LCF advisory group belong. The LCF submits this response to help inform the GLA of conversations related to the London Plan, and to give a sense of attitudes towards proposals from officers working on the frontline of culture in London.

The London Culture Forum

The London Culture Forum brings together officers from across London's 33 local authorities, with additional cultural representatives from key agencies operating in the capital.

Membership includes officers from all London local authority cultural services – across arts, culture, events, libraries and heritage – and representatives from organisations including Arts Council England, the Greater London Authority (GLA), London Councils and London & Partners.

The officers who attend the Forum have responsibility for a wide range of local cultural services including programming festivals, delivering workshops and participatory events, commissioning public art, working with local social, health and economic development agendas and supporting local arts and culture organisations and creative businesses through capacity building and other support services. Many officers also have responsibility for running arts venues such as theatres, museums and galleries.

The Forum's aims are to:

- Develop and promote local authority arts and cultural provision across the capital.
- Share information and good practice.
- Identify areas for collaboration.
- Support advocacy work for local arts and culture services.
- Embed a clear role for arts and culture in wider agenda.

The Advisory Board

The LCF is organised by the Advisory Board, made up of volunteers from several organisations invested in London's cultural offer. The organisations for which they work do not have any say in the management and steer of the LCF. Their notes and observations form the basis of this letter, and the membership is as follows:

Paul Hogan, London Borough of Barking & Dagenham

Rachael MacMillan, Historic England

Nick Bodger, City of London

Tracey Sage, Royal Borough of Greenwich

Jen Wood, London Borough of Southwark

Sara O'Donnell, Enable Leisure & Culture (London Borough of Wandsworth)

Carol Boswarthack, Association of London Chief Librarians

Sophie Lancaster, Arts Council England

Clive Lyttle, Arts Council England

Chenine Bhathena, Greater London Authority

Lucia Masundire, Greater London Authority

Spike van der Vliet-Firth, London Councils

The Event- discussing the New London Plan

The LCF event on 22 February was organised to allow officers from London Boroughs the chance to discuss elements of the Draft New London Plan that impacted on their role delivering cultural policy in their borough. Officers were given the chance to collaborate and share thinking on how they may incorporate the priorities and policies of the London Plan into individual local borough plans. It was also designed as an opportunity for officers from London boroughs to hear from GLA officers who work closely on elements of the new London Plan relevant to the group and ask them questions to make sure they were clear on how the New London Plan affected them.

The event had several keynotes discussing the importance of culture in place and planning, as well as several breakouts sessions discussing elements of the London Plan in more detail.

To read more about the keynote speakers and facilitators of the break-out, please see our agenda (appendix 1). The four breakout sessions that fostered conversations about the Draft New London Plan were:

Protecting, Growing and Retaining Cultural facilities

The session discussed:

- How to use the London Plan policies to retain and grow your local cultural provision.
- CEZ policy
- E2&E3 for affordable artists and creative workspace.

Heritage, Conservation and Views in a Growing City

The session discussed:

- Protected views
- Developing a clear understanding of your local historic environment
- Protecting heritage in regenerative change
- Heritage at Risk /bringing heritage buildings back into use

Supporting the Night Time Economy

The session discussed:

- Balancing the Night Time Economy
- Agent of Change
- Pubs

Using Planning Gain for Cultural Facilities

The session discussed:

- What it can be used for.
- Where section 106 is applicable to culture in the London Plan.
- Where it is applicable locally.
- How to write effective Section 106 agreements for culture.
- CIL

The event was well attended and popular amongst those signed up to the LCF. Around 50 people from a wide range of London boroughs and relevant stakeholders attended.

Outcomes from the Draft New London Plan breakout discussions

Introduction

The following snapshots of conversations are based on notes made by members of the Advisory Group, reflecting conversations in the above breakout sessions.

To reiterate, the following summary of discussions and the points raised are not the opinion of any organisation that members of the LCF Advisory Group are employed by. This seeks to share the views of officers attending the Forum when given the chance to discuss the impact of the New London Plan on their work and developing local strategic responses.

Summary

Overall, attendees of the LCF event spoke with positivity about the relevant policies in the New London Plan. A dedicated chapter and policies for Heritage and Culture was widely raised as a very welcome addition to the New London Plan. The importance given to Heritage and Culture for other policy aims such as place-shaping, regeneration, economic development, and community cohesion was also welcomed by the group.

In addition to the dedicated Heritage and Culture chapter, officers were keen to discuss E2: Low Cost Business Space, E3: Affordable Workspace and D12: Agent of Change Principle.

Within all breakout discussions there were some overarching themes that give a good perspective on how the way officers received the London Plan:

- The need for joined-up working and cooperation between the boroughs and the GLA
- The impact of funding reductions on culture and a recognition of the challenging environment borough culture officers operate in.
- The benefit the London Plan will have in fostering local conversations and developing local strategies.

Protecting Retaining and Growing Cultural Facilities

Some key themes emerged during this breakout session, which focused on New London Plan policies local plans need to be in conformity with. Conversations in the breakout sessions recognised:

- The benefit the London Plan provides in galvanising the development of local cultural strategies. The London Plan will make this work within boroughs more proactive, and will act as a good basis from which officers can engage local stakeholders within their organisations.
- Mechanisms to protect cultural venues through the Agent of Change principal were incredibly welcome.

- The benefit of having cultural and community assets on the CIL Regulation 123 list was raised during one of the breakout sessions, enhancing the powers and ability of boroughs to facilitate cultural and creative industries.

- The importance of cultural wellbeing/ health and wellbeing was raised. Methods of formalising and giving this more importance was discussed amongst the group.

- Officers spoke at length of the delicate balance between community engagement/ participation and decision-making, particularly when actions are taken that are not in accordance with the views contributed by the community. Officers spoke about the importance of managing expectations and that community consultation can sometimes be negatively affected by decision-making contrary to the views expressed locally.

- There was widespread positivity around projects that make use of meanwhile space. These spaces can be used for experimentation but it was raised that legacy and managing expectations must be fully considered. It was noted that meanwhile spaces can also occur on public land e.g. when a street is closed for development and should be encouraged.

- The groups looked forward to seeing how the Heritage and Culture chapter in the New London Plan would be incorporated or complimentary to Good Growth Policies/ Planning London's Future in Chapter 1.

- One breakout group felt that affordable creative and cultural workspace should be supported on a pan-London basis and would like to see as much distribution and development of these spaces as possible. It was raised these should be supported outside of Cultural Enterprise Zones.

- There was some confusion sensed amongst the group as to the difference between low cost business space and affordable workspace. The New London Plan could benefit from making the distinction clearer. There was also some confusion expressed as to what low-cost and affordable meant and could benefit from further definition.

Breakout Session- Heritage, Conservation and Views in a Growing City

- Both breakout sessions agreed that it was a positive step to see heritage and culture more closely aligned within the Plan; there was a lot of agreement that you cannot (and should not) see heritage and culture as separate entities, they are intertwined and it is obvious both disciplines complement one another.

- The prominence given to heritage and culture in the same chapter of the London Plan may encourage more London boroughs to develop their own cultural heritage strategies, ensuring these also think more widely of their cultural assets. This was seen as a very positive step and may encourage closer working/partnerships between cultural organisations and institutions at a regional and borough level.

- Both groups recognised that heritage (whether below ground archaeology or above ground built infrastructure and landscapes) adds to the interest in their local areas, makes them distinctive and provides a ‘sense of place’. The historic interest in individual boroughs also provides the stories which can inspire a myriad of cultural activities (as well as providing places to host cultural activities on a temporary or permanent basis).

- Both groups were also positive about the forthcoming Cultural Infrastructure Plan and saw the benefits of this in terms of highlighting the cultural heritage in their borough. A couple of boroughs wondered if their own local authority may be interested in developing a local version of the Plan, but recognised that this might not be necessary. Others felt it would be useful if you could extract demographic data from the New London Plan to see who is/isn’t engaging with the cultural offers in a borough and use this data to develop strategies to widen participation.

- There was also agreement in both groups, in terms of Creative Enterprise Zones, that whilst it is important not to create ‘false’ creative quarters and is much better to recognise (and enhance if needed) existing areas, some new quarters do work well, but it is important to create suitable new spaces for the creative sector.

- One group discussed the KPIs for both heritage and culture in the Monitoring section (Chap 12) of the draft London Plan. It was noted that it is important to also measure the positive impact heritage and culture have on people’s lives. However, mapping/measuring this is difficult as impact is often best measured after a specific period of time (i.e. one year, two years, five years). Having a baseline to measure this type of impact against is also key. A framework could be provided to measure outcomes against, but this raised other questions around who would be gathering the information for a framework and who would develop a framework? One way to measure impact was suggested in terms of how deliverable things are, the number of people involved/engaged and providing case studies. It was also noted that universities etc. could be used to support data collation in terms of engagement with/enjoyment of cultural activities.

- A suggestion was made that perhaps some sort of App could be made available for people to provide instant feedback on a cultural activity they have taken part in, with an incentive to complete it attached. One member mentioned an App used by the GLA at the recent Lumiere event in London, a geo-mapping exercise, which mapped where people went and what other activities in an area they took part in, this sort of data would be really useful for all London boroughs.

- Boroughs need to work in partnership with communities and developers to ensure everyone understands the character of a place and what cultural assets are already a strong community draw, rather than this being imposed on an area. It was noted that boroughs could perhaps do more themselves to ensure that conservation, planning, regeneration, housing, transport, arts and culture teams could all do more by working more closely together in areas earmarked for large developments.

Breakout session- Using Planning Gain for Cultural Facilities

Less feedback was captured from the group during this session, which was designed more to inform cultural officers of technical was planning policy that impacted on their work, delivering local cultural strategies and supporting cultural facilities in their borough.

- One group wished to discuss basement theatres in particular. The specialist advice to ensure safe design was discussed and the ability to use CIL for the purpose of operational maintenance of infrastructure.

- The groups discussed that S106 had forced boroughs to become better informed and more sophisticated in their approach towards negotiating with developers. The relationship and restrictions between S106 and Regulation 123 lists was also discussed by the group.

- It was asked whether Regulation 123 lists could be used to fund meanwhile projects, pop-up projects and other temporary provisions that do not feature on the list. Officers heard about how imaginative linking to public realm can achieve this, however it really needs a separate heading on the Regulation 123 list. If a strong link could be shown to the benefits of softer uses (i.e. pop-ups) achieving this could be possible.

- The role of informed planning officers within boroughs was discussed, particularly when theatres and other cultural institutions lack in building and construction terminology and knowledge of legislation. It was hoped the GLA could look at facilitating professional development between planning and culture colleagues on a pan-London basis, creating a more fluid landscape receptive to the needs of culture and creative industries.

Breakout Session- Supporting the Night Time Economy

- The sessions both raised alcohol-free night offers and the trend amongst under-25s which show less and less are drinking alcohol. It was important to boroughs that they continued to work towards a better balance in local night time offers.
- Representatives of boroughs expressed that they would welcome more information on wages in the night time economy as a foundation for a living night-wage.

- Boroughs spoke of the importance of collaboration amongst offers within a local authority. Success was shared in developing a night-time offer when cultural officers approached regeneration and community safety colleagues at an early stage in project design. They found it was easier to receive effective support in delivering the project further down the line when other officers felt involved in decision-making. It also allowed officers across the council to see the benefits of the Night Time Economy, gaining more endorsement across the Council.

- Lots of borough officers shared that they were approached strategies for particular town centres. Borough-wide strategies were less common amongst the breakout participants.

- Officers shared success in building unique offers for town centres. Officers had found that projects were less likely to be successful when they tried to replicate another offer elsewhere without consideration of local demographic factors.

Going forward with the delivery of the New London Plan, The London Culture Forum looks forward to working with the Greater London Authority to support cultural officers working in boroughs as well as their local partners. The London Culture Forum successfully brings officer from across London together, and we would like the GLA to keep an active relationship with us for the benefit of all London Boroughs. We look forward to working together with the GLA in order to utilise the London Plan, support borough officers in maximising opportunities brought about by the Plan, and continue to grow culture in London.

User:	London Borough of Hammersmith and Fulham

Chapter 7 Heritage and Culture

Greater emphasis should be given to the overriding context that London's heritage assets make a significant contribution to the City's culture and that they should be conserved. Greater weight should be given to their preservation with wording consistent with the NPPF.

User:	Buckinghamshire County Council
Support the aspirations of the policy to protect and enhance heritage and culture of the capital.	

User:	Putney Society

CHAPTER 7: HERITAGE AND CULTURE

We welcome the recognition of the importance of Heritage with both a chapter and also references elsewhere notably in chapter 3 Design and to some extent Chapter 4 Housing. This reflects the consensus that economic, social, environmental and cultural benefits derive from historic assets and surroundings.

We support the principle of this chapter to ‘inform the effective integration of London’s heritage in regenerative change’.

User: Theatres Trust

The draft Plan appears to be very strong in its recognition of the role arts and culture have in improving places and quality of life, and of drawing in visitors which supports London's wider economy. It provides protection, protection and support for arts and culture and of the venues that facilitate participation in and enjoyment of arts and culture. It represents a significant expansion and focus on such policies compared to the existing London Plan. It recognises and responds to the major challenges faced by venues, with policies setting out a positive strategy and framework to ensure enhanced consideration of the arts and culture within plan making and decisions across London during the plan period and hopefully beyond.
We acknowledge the Plan must be considered as a whole and that delivery of the 'Good Growth' principle, such as providing sufficient housing and employment to meet London's needs, is far broader than the Trust's remit and areas of expertise. However, on the basis of the proposed content concerning arts and culture we support the draft Plan.

Overall, the Trust believes that arts and culture should be more fully embedded and reflected in planning policy, decision making and planning outcomes throughout England. Within London, there is currently disparity between boroughs in terms of the strength of protection of cultural venues within Local Plans. We feel that the culture-related policies within this draft Plan will elevate the priority given to cultural policies at the plan making stage, and ensure greater consistency in decision-making which will benefit Londoners wherever they happen to live or work. They will also help to ensure the attractiveness of London as a place to visit and invest in.

User: PCS Trade Union

PCS represents approx. 3,000 members working in the Culture and Heritage Sector across London. We welcome the proposals in chapter 7 aimed at protecting heritage sites, creating more cultural institutions and ensuring that local authorities take these into account in their planning considerations (HC5).
However, 1 in 6 London jobs are now in the creative, leisure and heritage sector which is notoriously low paid. Thought must be given to who is going to staff these institutions and where these staff are going to live.
Whilst chapter 4 deals with delivering affordable housing we feel it is relevant to highlight also in this section. Most current affordable housing schemes are out of the reach of public sector workers. Especially, as their pay has either been frozen or capped at 1% for the last seven years. We understand that the Mayor is going to introduce a London affordable rent equivalent to the median income in a Ward. However, in central London or housing developments such as the Olympic Village, the Ward median would still be significantly higher than most staff working in the Culture Sector earn i.e. most earn the London Living Wage i.e. approx. £19,000 per annum.
Using such a calculation to define a London affordable rent will create “ghettos” such as is the case with East Village in Stratford where only the wealthy can afford to live and the poor can only visit for work. This does not achieve the aim of creating diverse communities for all to live and thrive. We need a criteria or definition that takes into the true picture of public sector earnings and reintroduce the concept of social housing to stem the tide of “social cleansing” that we are currently seeing across London.
The key concern for the Culture Sector is the consistent funding cuts across the sector and the negative impact this has on workers’ terms and conditions. There is active encouragement of commercialisation from central government which has resulted in the increasing use of the private sector. This has resulted in an increase in the number of staff earning below the London Living Wage, the increase of staff employed on zero hours contracts and the increase in outsourced employers not willing to voluntarily agreeing to trade union recognition. These staff are more likely to work two or three jobs and spend at least two-thirds of their income on housing, usually located on the outskirts or outside the Capital. We need a way of achieving minimum employment standards across the Cultural Sector applicable to both public and private sector employers.

User: UCL Urban Laboratory

5. HERITAGE AND CULTURE

The queer community is inclusive of many different people who often express complex sexuality, sex and/or gender identities, but are united by the experience of social ‘othering’, where expression of these identities at home, at work, or in public can result in shaming, bullying, physical exclusion or harassment and violence. In response to these experiences, the queer community has developed a unique culture, expressed and nurtured in specific spaces which often act as sanctuaries, allowing freer expression of individuality and the sharing of common experience. The dynamic and fruitful experience of queer spaces is often difficult to replicate in other venues not designated for the purpose: it depends on an organic and fragile combination of social, cultural and urban factors.

London falls behind many of its global peers when protecting and supporting the queer community, including in failing to provide a dedicated community space, unlike New York, Berlin, Los Angeles and San Francisco. Thus, spaces for the LGBTQI+ community serve multiple, important functions, including: acting as spaces to keep people safe from violence in public or at home; to provide social support and develop social networks; to allow a free expression of often repressed identities; to enablethe delivery of essential health and advice services; and to provide space for civil rights organisation and activism. Overall, the silo headings in the London plan make it difficult to cover the cross-cutting importance of these spaces as sites of heritage, culture, social infrastructure and good growth. London boroughs should recognise that they all contain unique and irreplaceable LGBTQI+ heritage and this should always be part of thinking around preservation and celebration of cultural heritage.

There are several significant policies missing from the draft London Plan, namely:

In liaison with the GLA who have committed to maintaining a database of LGBTQI+ venues to monitor openings and closures into the future, the London Plan must stipulate that local authorities be responsible for developing and maintaining their

own list of LGBTQI+ venues and resources in their locality, in collaboration with the local community, and ensure no net loss of venues from year-to-year.
All LGBTQI+ spaces predating 1986, and others as determined through a process of research and community engagement, should be specified in the London Plan as legacy heritage venues with protection against redevelopment.
Asset of Community Value status should be redefined to not require only a geographic community (i.e. by postcode of residence) to generate the response, so that alternative communities, such as those with Protected Characteristics (Equality Act 2010) could also apply as a community.
In terms of the specific policies, it is disappointing not to see the protection of LGBTQI+ venues named in any of the policies currently provided. Further to this, we have the following comments on these policies:

User: Central Ealing Residents' Association

In conclusion we are concerned with the length of the Draft New London Plan, the amount of detail covered and the number of policies. It is full of statements which sound impressive but which mean all things to all people. We support design led planning in principle, but have little confidence in the ability of Boroughs to produce design codes. The decline in planning staff in Ealing, as in many other boroughs, has left the Borough with little capacity to undertake such exercises or even to commission them. We are equally unimpressed by the protection the policy purports to provide to heritage assets. Ealing as a Borough has just one conservation officer who deals with heritage assets on only two days a week. Few other of the Borough's planners appear to have even basic training in this area.

User: Central Ealing Residents' Association

In our view the importance of listed buildings and conservation areas should be stressed to reinforce the policy of design led development in adjacent and nearby areas to Conservation Areas. For example tall buildings are rarely appropriate in or near conservation areas. We object to the apparent acceptance of the need for tall buildings across the whole of London as higher residential densities do not necessarily require tall buildings. We object particularly strongly to the idea that tall buildings are needed as an aid to navigation, which is a contention without any justification. If a suburban area is largely 2-4 storeys in height, 6-8 storeys in a town centre will stand out sufficiently to aid navigation for pedestrians and car drivers, using their eyes rather than other means of navigation.

User:	Better Bankside Business Improvement District

Better Bankside are widely supportive of the Mayor’s policy proposal concerning heritage conservation and growth.

Indeed, Better Bankside welcomes a policy framework which ensures that development proposals consider the context in which they are situated and outlines the necessary considerations to conserve an area’s existing architectural heritage but also reflect and enhance its historic character to develop a sense of place that remains sensitive to its environment.

As part of a wider programme of public realm improvements along Borough High Street, Better Bankside have embarked on an exemplar project named the Inns and Yards3. This project intends to provide a safer, healthier connection between the attractions along Borough High Street and London Bridge station. However, additionally driving the project’s ambition is telling the story surrounding street’s former uses. This will be achieved through a carefully considered choice of materials, graphics and layout decisions that echo the Inns and Yards’ history, whilst enhancing the existing heritage features.

User:	Environment Agency
We welcome the recognition that the Mayor attaches to the capital’s heritage assets and historic environment, including its waterways, and their value to the vibrancy and success of the capital.	

User:	Environment Agency

Recommendation:

There is scope for the text to recognise the historic landscape value of London’s river corridors, and to address the riverside settings of assets of historic value. This would reinforce the objectives of this chapter, and those of chapters 8 and 9

User: London Councils

London boroughs welcome the inclusion of a dedicated Heritage and Culture section of the London Plan for the first time. Boroughs are keen to work with the GLA on improving and diversifying London's cultural offer.

As well as financial challenges faced by local government when supporting culture and the arts, London has seen many venues close in the last decade and has a limited night-time transport system offer compared to other world leading cities. With the introduction of night-tube and the introduction of Cultural Enterprise Zones, London is taking important steps to supporting and sustaining the cultural offer of the capital.

While there is broad support for the principles outlined here, challenges still remain regarding funding for the sector and managing Night Time Economy (NTE) development in a way that minimises impact on residents and neighbourhoods. London boroughs look forward to working with the GLA to develop policies that balance city-wide culture and heritage priorities with the needs of local communities and neighbourhoods.

User: Old Bermondsey Village Neighbourhood Forum

Boroughs should be required to have a **Local List** and Neighbourhood Plans should be encouraged to facilitate this in their areas and fast tracked to bring forward specific "**site briefs**" framed by local knowledge with a view towards encouraging community orientated and owned developments of all scales. The functioning of Conservation Areas in planning practice should be reviewed by the GLA in terms of boroughs overall strategies and the CA boundaries and the effective weight they actually have in the shaping of the development. This is because councils are currently ignoring their CA policies in favour of high-rise housing to meet their targets (and solve their debt issues).

This should be informed by Historic England guidance:
“Local lists play an essential role in building and reinforcing a sense of local character and distinctiveness in the historic environment. Local lists can be used to identify significant local heritage assets to support the development of Local Plans. Encouraging the use of local lists will strengthen the role of local heritage assets as a material consideration in the planning process…
“Moreover Local Lists are usually made very effectively in partnership with local residents through occasional appraisal and/or a nomination system which recognises and takes advantage of local residents’ knowledge, and highlights community value assets. This is invaluable in engaging the local community in the effective conservation of their neighbourhood’s heritage. “
“At its heart, local listing provides an opportunity for communities to have their views on local heritage heard. It recognises that the importance we place on the historic environment extends beyond the confines of the planning system to recognise those community-based values that contribute to our sense of place.

By contrast in Southwark the council are on the one hand obstructing neighbourhood planning by turning down the energies of the neighbourhood forum who offered to kickstart a borough wide local list (evidence base). Thus in place of a deep and detailed understanding of the area (an independent audit of the local economy and cultural uses for example) the Council are relying on a BID (Team London Bridge) on the other hand to plan the area for them - or rather to hold exhibitions for developers of windfall sites on St Thomas Street - this is clearly the opposite of community inclusive local planning informed by proper consultation and does not constitute the collection of an evidence base that allows for review / that can inform the Sustainability Appraisal. Their site briefs, unsound as they are, are currently trumping / bypassing heritage and conservation policy.

The functioning of Conservation Areas (CA) within planning practice should be reviewed in conjunction with / by the GLA in terms of a Council’s overall strategy and the actual CA boundaries in terms of the effective weight they actually have in the shaping development.

User: London Borough of Hillingdon

The Council welcomes the Mayor's focus on heritage and conservation. However, there are serious concerns that the heritage related objectives will be undermined by the housing growth policies contained in other chapters of the draft plan.

It is imperative the heritage based planning policies seek to protect the wider settings of heritage assets; otherwise such assets will have their value eroded by nearby developments, which adversely impact on their settings and wider significance. This is of particular concern with regard to Conservation Areas and Areas of Special Local Character, which cumulatively cover large parts of Hillingdon.

User:	Alison Hatt

Tall buildings such as The Shard are out of proportion to its surroundings; too many commercial buildings in the city have spoiled the sky-line (Policy HC4) and are in danger of impinging on the World Heritage Site (Policy HC2) of the Tower of London to its detriment.

User: Royal Borough of Greenwich

Chapter 7 Heritage and Culture

The fact that Heritage and Culture is given its own separate section emphasising its importance in driving good growth, is welcomed as a very positive step forward. Our experience of leading the delivery of the Woolwich Creative District demonstrates the real positive outcomes that can be achieved when heritage and culture are the driving force for regeneration, and we fully support the importance the draft Plan places on these interlinked issues.

We welcome the new policy requirements for positive action for Heritage at Risk assets, considering significant archaeology in development and increased protection for designated views and for world heritage sites. We also welcome the promotion of new Creative Enterprise Zones (CEZs) and Cultural Quarters to anchor town centre renewal and policies to support and promote the night-time economy, as well as to protect cultural venues and uses, especially night-time venues, creative workspace and public houses.

User: The Northbank BID

Chapter 7 : Heritage & Culture

HC1: Heritage, conservation and growth, Policy HC3: Strategic & Local Views, Policy HC5: Support London's Culture and Creative industries.

Northbank has a diverse range of heritage assets and we are working with Westminster City Council and local stakeholders to enhance the surrounding streets to improve the setting. Creating a high-quality public realm and environment has been a priority of The Northbank BID since its inception.

- Appropriate placemaking in Conservation areas and near to heritage assets.
- We recognise that some assets surroundings can be visually improved and provide greater access.

Views bring visitors to the area provide a significant contribution to the image of and character of London. The views from the River Thames embankments and bridges (Waterloo and Golden Jubilee Footbridges), along the Strand and to heritage buildings such as RSA, Savoy, the churches. We support the on going protection of views and improvement

The Strand Aldwych area has many cultural assets and is home to creative clusters based in and around Somerset House. Proposals to enhance Aldwych will bring fuller collaborative working and will provide the opportunity for outdoor cultural events.

We support this in alignment with Policy E2, Low-cost business space, Policy E4 Land for Industry, Logistics and Services to support London's economic function and Policy E8: Sector growth opportunities and clusters.

- Supporting culture with events, exhibitions and learning to – world centre
- Supporting the cultural industries with increased opportunities for collaboration, exposure to partnerships and finding. Suitable work space with flexibility for growth

User:	London Borough of Enfield

1) Plan needs stronger recognition of the need to avoid and minimise harm for all heritage assets.

2) It needs to reference that culture can address existing inequalities.

User: Mama Ujuaje

The Food heritage of London is rooted within its deepest past - but in what way is this fact acknowledged in terms of how the planning of its built environment is spoken of and designed?

Engagement with food is a basic activity of all Londoners and the diversity of this engagement is embodied in the variety of food system practices Londoners engage in; from the curried eel and mash shop to the haute cuisine Latin American offerings of Soho, from the occasional herbal supplement trader to Fortnum and Mason's food counters. Some few may keep goats for milk and others grow lettuces underground, to cater for the salad eaters of the city. The range in London food cultures derives from often turbulent histories which also relate to the detailed designs of London architecture, the characters of the town centres and the ways in which decisions are made about London's spaces, writ small as well as in how opportunity areas are configured, so writ large.

Markets ancient and modern have defined the central layout of London, the need to access local breweries, and a good supply of milk, meat and bread for the nobility have shaped the spaces which we take for granted in the West End and in the City, the plantation investments of distant shores defined the location of gentlemen's clubs, coffee houses, hotels, inns and trading places. The internal docklands have received the bounties plundered by City exploits bringing in tobacco, sugar, cotton and chocolate and wholesale markets have grown up around the associated businesses. Even the educational institutions which were built for the elite to learn how best to extract from and protect British territories abroad, which largely consisted of plantation economies or natural resource extraction operations form part of the capital's current heritage and culture today.

Knowing this, it is not possible to think of the spatial planning of London, with respect to heritage and culture, without factoring in the heritage and culture of the city's food and the diverse populations who have made parts of London their own and conferred unique cultures of trade, music, arts and ways of relating with each other, unique to them and shaping the way in which a place is understood, not only by its longer term citizenry, but also by those who have moved in, in waves of new settlements across London, with varying degrees of intensity.

It is therefore quite disingenuous to speak of the historic culture and heritage of London without referring to these things, yet this is what this chapter has done. It sets the tone for a 'development' of London which ignores the culture of its current citizens and treats history, the idea of heritage and the sense of culture almost as boxed artefacts to be handled as one might preserve or conserve an archive, an artefact, a history that is now dead and past, not as the living culture and heritage that continues this London tradition of constant change and stable traditions, diversity and constancy, a creative interplay of identities: ethnicity/race, class, creed, belief and more.

In responding to this, food growing networks have the opportunity to seek to insert into this chapter how the heritage and culture of London ought to recognise food growing traditions, however modern or however ancient; those associated with local knowledge and those knowledges from shores a great distance away and seek to preserve them and their benefits they bring to the practice

of growing as well as to the diverse communities of London. It might also argue that heritage and culture are concepts that are ongoing, rather than static and so should be embraced by policies and plans pertaining to London which make use of reconsidered changes to the land and natural resources of the city, in light of new understandings of the environment and food growing practice, such as that referred to as agroecology, which promises a positive renewal and adaptation of food growing in the context of human land use.

The use of the term heritage and culture might also be referred to by London's food growing networks as needing to include and refer to London's food heritage (which is diverse) and understanding that much of London's current popular 'culture' revolves around food, its sourcing: local, its marketing: specialist, local farmer and 'fresh' and its consumption: specialist 'foodie'.

What this approach ignores, however, is the food culture of the lower and working classes, children and the elderly, disabled, ethnic minorities and homeless.

Food is arguably a more important factor in the well-being of this part of London's citizens than for others. A greater proportion of the income of the poor is spent on food than on any other basic household need.
https://www.ons.gov.uk/peoplepopulationandcommunity/personalandhouseholdfinances/expenditure/bulletins/familyspendingintheuk/financialyearendingmarch2016

https://www.kelloggs.co.uk/content/dam/europe/kelloggs_gb/pdf/R3_Facts%20about%20Food%20Poverty%20ReportFINAL.pdf

What kind of culture exists and continues to emerge in relation to these groups and how able have food growing networks been in responding to these cultures and their food system demands or needs and how do such networks visualise any spatial planning to enable a more full response to this sector of London's humanity to be better met by a plan for London.

However, given that the plan is considering all of London's structures: housing, transport, green infrastructure, etc., each of which interfaces with different aspects of the food systems of London, (which are, in themselves, connected to the food systems of the nation and indeed the globe), London's Food Networks will need to ensure that its responses reflect the current realities of how different types of Londoners interface with the food systems held within London cultures and researches and understands the factors which drive their development (or demise).

What, for example, is the response of food growing networks to the proposed closure of chicken shops and the narrative discourse around this policy move? Are they looking at the entire food system in which chicken shops sit: the supply chains, the alternative employment possibilities, the impact on where the ‘school pound’ is spent alternatively, the local economies, etc.? What might be the social impact assessment of a called for closure of chicken shops in a locality, especially one which involved the communities and other private/corporate agencies which are engaged in the food supply system for school children in the locality.

The awareness and pro-activity of a food growing advocacy network in holding this complexity is limited to how it frames its own work and the level of partnership it undertakes to foster with the range of institutions which represent other aspects of the food systems which feed all of diverse London.

2

3
So let us look at the specific policies under the London Plan Draft chapter on Heritage and Culture to
see what might stand out for editing.

Firstly, what is the Good Growth framework policy that it sits in?
From GG1 policy D

promote the crucial role town centres have in the social, civic, cultural and economic lives of Londoners, and plan for places that provide important opportunities for face-to-face contact and social interaction during the daytime, evening and night time.

And a suggested addition to GG2:

G. That, mindful of the need to optimise the use of space, intensification planning at borough level ensures there is sufficient social impact assessment to ensure changing land uses do not impact adversely those whose claims on the land have been hitherto less well represented. Furthermore no new land use should have the effect of displacing heritages and cultures that are part of what is widely recognised as giving London its special character as a ‘world city’.

And From GG5 policy F

promote and support London’s rich heritage and cultural assets, and its role as a 24-hour city.
We can bear these in mind when considering the H&C policy recommendations:

User: Inclusion London

Chapter 7 Heritage and Culture

A regularly produced government report found that engagement in the arts, heritage and museums or galleries is lower amongst adults from ‘minority groups’ such as disabled people.[1]Research revealed that for 57% of the disabled people surveyed transport was a major issue regarding participation in cultural life, recreation, leisure and sport, while for 52% the price of tickets was a financial barrier.[2] Disabled people are also at a substantial disadvantage compared to non-disabled people when booking tickets to sporting events and more than half have had to sit in an unsheltered seating area at a sporting event.[3] [4] We would welcome the Mayor’s involvement to address these barriers.

[1]https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/539312/Taking_Part_2015-16_Quarter_4_Report_-_FINAL.pdf

[2]file:///C:/Users/Henrietta.Doyle/Downloads/shape_understanding_disabled_people_as_audiences_2012-13.pdf

[3] http://www.musculardystrophyuk.org/app/uploads/2016/09/Move-the-goal-posts-final.pdf

[4]https://www.equalityhumanrights.com/en/our-work/news/morethird-premier-league-clubs-will-not-meet-disabled-accessibility-standards

User: Gidea Park and District Civic Society

We fully support your strong commitment to “Protect & Enhance” Heritage Assets, and the general thrust of your policy, clearly of importance not only to the present but future generations.

A commitment to, high quality design, to create, protect and enhance distinctive places and spaces is essential, ensuring development is of high architectural quality, well designed respecting the character of the local area.

Policies should set this out in as clear and unambiguous a manner as possible to clearly guide decision makers, ensuring the intentions of the policy are fulfilled. This is where we have experienced problems, policy becoming less specific over the years creating uncertainty for Councillors and Officers processing applications.

It is essential to have the knowledge and expertise available to deliver high quality decisions, including adequate funding for specialist Officers and better quality training than at present for Councillors dealing with planning applications in this specialist area.

Article 4 Directions, from our experience are the best way of exercising control in a Conservation Area and would advocate greater adoption of them in other Conservation Areas.

User: Ealing Matters

FALP Policy 7.9: Heritage-led regeneration has been deleted without explanation.

This key policy has a key role to play in delivering things that Policy HC1 in the New Plan aspire to. It was inadequately pursued both over recent years at both Metropolitan and Borough levels but that is not a justification for jettisoning it.

User: Organiclea

We support the additional policy in the Heritage and Culture chapter

HC8:

1. **Boroughs must:**
    1. **protect traditional markets where they have a heritage, economic, social or cultural value to local communities, and where they contribute to wider policy objectives for town centres and Creative Enterprise Zones**
    2. **support proposals for new traditional markets to stimulate town centre regeneration, cultural quarters and mixed-use development.**
2. **Applications that propose the loss of traditional markets with heritage, cultural, economic or social value should be refused unless there is authoritative marketing evidence that demonstrates that there is no realistic prospect of the space being used as a market in the foreseeable future.**
3. **Development proposals for redevelopment of associated accommodation, facilities or development within the curtilage of the traditional market that would compromise the operation or viability of the traditional market use should be resisted.**

We believe that this is essential to the London Plan's over-arching good growth principles as amended by CFGN and Just Space: GG1 (Building strong and inclusive communities), GG2 (Making the best use of land), GG3 (Creating a healthy city), GG5 (Growing a good economy), GG6 (Increasing efficiency and resilience).

User: CFGN Community Food Growers Network

We support the additional policy in the Heritage and Culture chapter

HC8:

A. Boroughs must:

1. **protect traditional markets where they have a heritage, economic, social or cultural value to local communities, and where they contribute to wider policy objectives for town centres and Creative Enterprise Zones**

2. **support proposals for new traditional markets to stimulate town centre regeneration, cultural quarters and mixed-use development.**

B. Applications that propose the loss of traditional markets with heritage, cultural, economic or social value should be refused unless there is authoritative marketing evidence that demonstrates that there is no realistic prospect of the space being used as a market in the foreseeable future.

C. Development proposals for redevelopment of associated accommodation, facilities or development within the curtilage of the traditional market that would compromise the operation or viability of the traditional market use should be resisted.

Henceforth, we believe that this is essential to the London Plan's over-arching good growth principles as amended in the CFGN submissions (See above for our amended GG1, GG2 and GG3) and as amended in the Just Space submission on Good Growth: GG1 (Building strong and inclusive communities), GG2 (Making the best use of land), GG3 (Creating a healthy city), GG5 (Growing a good economy), GG6 (Increasing efficiency and resilience)

Please see full pdf for more detail

User: Ms Deirdre Woods

I support the additional policy in the Heritage and Culture chapter

HC8:

A. Boroughs must:

1. protect traditional markets where they have a heritage, economic, social or cultural value to local communities, and where they contribute to wider policy objectives for town centres and Creative Enterprise Zones

2. support proposals for new traditional markets to stimulate town centre regeneration, cultural quarters and mixed-use development.

B. Applications that propose the loss of traditional markets with heritage, cultural, economic or social value should be refused unless there is authoritative marketing evidence that demonstrates that there is no realistic prospect of the space being used as a market in the foreseeable future.

C. Development proposals for redevelopment of associated accommodation, facilities or development within the curtilage of the traditional market that would compromise the operation or viability of the traditional market use should be resisted.

User:	CFGN Community Food Growers Network
Please see attached PDF	

User: Blackheath Society

Chapter 7

As noted above, we would wish to see the reinstatement of the language of the 2016 Plan which underlines the need for balance in developments affecting heritage assets and their settings. This is in contrast to the language of the current draft plan which creates a presumption of development with insufficient regard for its context. We would wish to see explicit wording in the London Plan comparable to that in the 2016 plan (which was derived from paragraphs 131-135 of the National Planning Framework) stating explicitly that substantial harm to any designated asset will be permitted only exceptionally while less than substantial harm should be weighed against the public benefits of the proposed development.

User:	Highgate Society

In general, the Society finds the policies in this section encouraging. There are some issues, which have been highlighted below, plus positive aspects that will be beneficial, as long as they are adhered to.

However, one clear thing underlines this, which is that in several clauses, it is necessary to re-word the policies so that Conservation Areas are clearly included among, and also designated, as 'Heritage Assets'. As a general point the assumption is made throughout the chapter that Heritage Assets are buildings of some kind. This assumption is incorrect. National legislation and guidance is very clear that Conservation Areas are Heritage Assets in themselves

User:	Chairs of Camden's Conservation Area Advisory Committees
We broadly welcome these policies, and seek to enhance their effectiveness for the benefit of all communities.	

User: Historic England

Historic England warmly welcomes this chapter and the prominence it gives to the complementary relationship between London's heritage and its cultural offer as a world city.

We strongly support the heritage and culture policies with only a very few recommendations for amendment to ensure consistency reading across the Plan, and to strengthen links with the wider Plan objectives.

Historic England has been pleased to work with GLA officers in producing the Maps which illustrate this chapter so well and illuminate the richness of London's historic environment.

As a general point, we consider that the strategic significance of London's Royal Parks and historic landscapes is not readily apparent in this chapter. Similarly, the historic significance of the River Thames as a strategic asset proving the setting for many of London's most significant.

We recommend that the strategic significance of London's historic landscapes and the River Thames is identified in this chapter.

(See our comments on Chapter 8, policy G1, and Chapter 9, policy SI14)

User: Mx Beth Stewart

We support the additional policy in the Heritage and Culture chapter

HC8:

A. Boroughs must:

1. **protect traditional markets where they have a heritage, economic, social or cultural value to local communities, and where they contribute to wider policy objectives for town centres and Creative Enterprise Zones**
2. **support proposals for new traditional markets to stimulate town centre regeneration, cultural quarters and mixed-use development.**

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C. Development proposals for redevelopment of associated accommodation, facilities or development within the curtilage of the traditional market that would compromise the operation or viability of the traditional market use should be resisted.

We believe that this is essential to the London Plan's over-arching good growth principles as amended by CFGN and Just Space: GG1 (Building strong and inclusive communities), GG2 (Making the best use of land), GG3 (Creating a healthy city), GG5 (Growing a good economy), GG6 (Increasing efficiency and resilience).

User:	Landsec

Chapter 7: Heritage and Culture

We welcome the addition of a chapter and policies on Heritage and Culture in the Plan and aside from the representations below, support the principles proposed.

User:	Ruislip Residents Association

Ch. 7 Heritage & Culture Proposals to develop in these areas should respect the current planning requirements e.g. Conservation, Area of Special Local Character etc, to ensure the local character is maintained.

User: Matthew Robinson

I support the additional policy in the Heritage and Culture chapter

HC8:
A. Boroughs must:

1. **protect traditional markets where they have a heritage, economic, social or cultural value to local communities, and where they contribute to wider policy objectives for town centres and Creative Enterprise Zones**
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C. Development proposals for redevelopment of associated accommodation, facilities or development within the curtilage of the traditional market that would compromise the operation or viability of the traditional market use should be resisted.

I believe that this is essential to the London Plan's over-arching good growth principles as amended by CFGN and Just Space: GG1 (Building strong and inclusive communities), GG2 (Making the best use of land), GG3 (Creating a healthy city), GG5 (Growing a good economy), GG6 (Increasing efficiency and resilience).

User:	Primrose Hill Conservation Area Advisory Committee

Chapter 7 Heritage and culture
We broadly welcome these policies, and seek to enhance their effectiveness for the benefit of all communities.

Chapter 8 Green Infrastructure and Natural Environment

User: Shared Assets

We support London Food Link's response:

As Sustain has highlighted in previous consultations, there needs to be **more recognition and link of the role that food growing and productive green space can have on physical and mental health**. In particular G8 needs to be reworded; whilst food growing is mentioned in a few places, it does not receive the coverage it deserves in regards to its current and potential role in delivering multiple benefits including:

- Healthy food, with lower greenhouse gas emissions
- Opportunities for connection with nature and activity promoting mental health
- Increased resilience through development of localised food systems
- Recreational and skills development
- Contribution to biodiversity

The current large number of Londoners involved and the multiple benefits that food growing projects have provided for the city deserves increased recognition and protection; without these spaces London would be a much less green and biodiverse city, as data continues to show from the Capital Growth programme, supported by the Mayor of London, London Food Strategy and previous London Plan.

We would like to see **more links made between the Greenbelt and potential for peri-urban agriculture, horticulture and orchard**s. We believe that a productive Greenbelt would be protected, rather than being left and therefore targeted for future development. Moreover, the application of organic and permaculture techniques for food growing could contribute significantly to biodiversity, soil retention, carbon sequestration and water management.

User: Keith Saunders

With reference to the London Plan consultation I wish to respond as follows.

The importànce of trees and woodlands cannot be emphasised enough. They improve air quality, provide vital habitat for wildlife, much of which is disappearing from urban areas and aesthetically they help to brea? up views of endless buildings. Also, people feel better and more relaxed in wooded areas. I work as a conservation volunteer and any time spent in woodland makes me feel better in myself.

In the sections listed below (in the same order as they appear in the draft London Plan).

- Paragraph 1.3.3. Recommend an addition (in CAPS) to the following sentence: “Access to green and open spaces, including waterways AND TREES, can improve health, but access varies widely across the city.”
- Paragraph 3.9.5. I support the inclusion of “Protection for trees” as an issue in the amplification of potential negative impacts of large-scale basement development beneath existing buildings.
- Policy H1. Increasing housing supply. I recommend that Sentence B2)d is clarified so that “public sector owned sites” will not include woodland, parks and open spaces.
- Paragraph 4.2.9. I support the principle of “no net loss of overall green cover” as a result of small housing developments, and support “off-site provision such as new street trees” in order to achieve this principle. I recommend an addition (in CAPS) to the following sentence: "Loss of existing biodiversity OR GREEN SPACE, as a result of small housing developments, should be mitigated through measures such as the installation of green roofs, the provision of landscaping that facilitates sustainable urban drainage, or off-site provision such as new street trees in order to achieve the principle of no net loss of overall green cover. Rainwater attenuation features should be incorporated to achieve greenfield run off rates. LOSS OF ANY PUBLIC GREEN SPACE WILL BE COMPENSATED FOR WITH ALTERNATIVE ACCESSIBLE SITES.”
- Policy S4. Play and informal recreation. I support section B2)d, that residential development proposals for schemes that are likely to be used by children and young people should incorporate good-quality, accessible play provision for all ages, of at least 10 square metres per child that: “incorporates trees and/or other forms of greenery”.
- Policy G1. Green infrastructure. I support this policy, and subsequent narrative that mentions the important role of trees.
- Policy G5. Urban greening. I support this policy, including the recommended Urban Green Space Factor, and subsequent narrative that mentions the important role of trees. I support the inclusion of the role and weighting for woodland and trees in Table 8.2 - Urban Greening Factors. I recommend including a reference to Residential Development and Trees (Woodland Trust, 2015, woodlandtrust.org.uk/residentialdevelopments).
- Policy G6. Biodiversity and access to nature. I support this policy. I recommend that Sites of Metropolitan Importance and all ancient woodlands are added to the categories of planning applications that must be referred to the Mayor.
- Policy G7. Trees and woodlands. I support this policy. I recommend that Section B)1 is strengthened as follows (amendments in CAPS): “GIVE THE STRONGEST POSSIBLE protectION TO ‘veteran’ trees and ancient woodland, ESPECIALLY where these are not already part of a protected site”. I support the subsequent narrative on the role of trees, particularly paragraphs 8.71 – 8.73. I recommend referring London boroughs to guidance on ancient woodland and veteran trees: Planners’ manual for ancient woodland and veteran trees(Woodland Trust, 2017, woodlandtrust.org.uk/plannersmanual).

Please accept this my formal response to the consultation. I will look forward to hearing from you as the Plan progresss.

User: Hammersmith and Fulham Biodiversity Commission

1. Policies regarding green space within new developments are suggested aims, rather than clear, mandated guidelines. This means developers will continue to be able to ignore them. The Urban Greening Factor[1] is a useful tool but of more use when redeveloping existing sites.

   Changes required

   Should the Urban Greening Factor index be used for new housing developments, and particularly large developments, the threshold must be high (far greater than the 0.4 suggested for residential development[2]). A simple more effective ratio for large new developments would be a ratio of 1:1 - build footprint relative to green open space footprint.

2. There continues to an absence of mandated obligations for all developers to obtain comprehensive information about baseline environmental conditions which prevail pre-development. This lack of information is contributing to the loss of biodiversity, green space and obstructing other greening measures since planning departments are not being informed about potential adverse environmental impacts and cannot take corrective action.

   Research conducted by the Greater London Authority itself in 2016 showed that approximately 18% of planning applications have the potential to impact adversely on nature in the capital, yet only 1% of applications were informed by a data search from Greenspace Information for Greater London (GiGL).

Changes required

Policy should clearly mandate that information from GIGL must be obtained by all commercial and residential developers and included in their planning applications.

[1] Policy G5

[2] Policy G5, B

User: London Legacy Development Corporation

Green Infrastructure

LLDC has delivered significant areas of new high quality green space as part of its legacy transformation work and in the delivery of new development projects. Our current Local Plan identifies specific requirements for open space in specific site allocations, and the review we are currently conducting includes an open space and place space assessment to ensure it is up to date in this respect. Some guidance on the mitigation of the loss of existing biodiversity or green space as a result of small housing developments would be a useful addition to this section.

User: Lee Valley Regional Park Authority

Draft London Plan consultation

Thank you for consulting the Authority on your draft plan. This was considered at the meeting of the Regeneration and Planning committee this month and the following comments were agreed.

Abercrombie's Vision and the Authority's strategic purpose

Whilst it is acknowledged that the London Plan is a strategic plan, the statutory purpose and role of the Regional Park in the context of London's growth is completely lost in this draft. This undermines the Abercrombie vision and the statutory basis of the Authority to create a Regional Park dedicated to leisure, recreation, sport and nature conservation. The Park plays a significant role in providing for the leisure needs of the capital. Whilst around 7m visits are made each year to the whole park, the largest proportion is made by Londoners to its venues and parklands. It is a strategic component of the capital which will assume greater significance against the backcloth of continued growth and should be recognised as such in this plan.

The existing and developing offer

Our visitor tracking indicates that visits to venues and parklands within London attracts just over 2m visits from Londoners and across the wider Park the total is 3.3m visits. This figure is set to grow as sites such as Walthamstow Wetlands aims to achieve its target of 300,000 visits p.a., together with the Authority's plans for the redeveloped ice centre on Lea Bridge Road and plans for Picketts Lock which will be operational within the next 3 years. Each of these schemes will have considerably wider regeneration benefits within the Lee Valley Opportunity Area, bringing jobs and leisure in an area of deprivation. The Regional Park is important to both the whole of London and local communities along the valley.

Furthermore, the Regional Park is a major venue for sporting and cultural events attracting around 270,000 spectators at over 300 events each year. Each venue and large areas of parklands are used for international, national and local events. Since opening in 2014, our two legacy venues within London, the LV Hockey and Tennis Centre and the VeloPark have hosted 18 international events. This year they will host the FIH Women's Hockey World Cup and the UCI Track Cycling World Cup with an emerging programme for the next three years which includes the Commonwealth Games cycling in 2022. The Regional Park will continue to play a significant role in meeting London's leisure needs during the plan

period. This should be referenced explicitly in your plan. Extrapolating from the figures used in the GLA's recently commissioned report by Vivid Economics, Natural Capital Accounts for Public Green Space in London (2017), the Regional Park just in London delivers £250m in benefits to Londoners in 'avoided health' costs and provides mitigation against climate change and the capital's 'heat island' effects.

Providing a framework for development opportunities

The Regional Park is unique in the quality and range of its offer; it is a place comprising award winning and internationally regarded venues, the legacy of London 2012 as well as SSSIs. Whilst over 90% of the Regional Park is designated as green belt or MOL, there should be recognition within the draft plan that an exception to this standard policy is required or a reference included in supporting text to the Authority in pursuit of its statutory purpose to allow for the redevelopment and or expansion of its venues. Without this change the Authority's ability to deliver will be frustrated. For the Authority, this is particularly important as we are reducing dependency on the levy paid by the London taxpayers, by ensuring that venues operate at nil cost and are sustainable and viable community assets in the long term. Sites such as Picketts Lock, where we will shortly announce a partnership with private sector investors, are identified in the Council's local plan as 'major developed sites' to reflect the old designation originally recognised in government advice contained in PPG 2. This designation allowed the Authority the freedom to secure major development at Picketts Lock including a cinema, restaurants, leisure centre and the Lee Valley Athletics Centre building. Whilst there are references to the Lee Valley Walk, the draft plan should recognise the importance of the Regional Park as it provides a route for walking and cycling to support visits through north east London – connecting to Hertfordshire and Essex. It is a key part of the Mayor's proposals for delivering 80% of all journeys by sustainable means. Finally, the draft plan identifies the Lee Valley Opportunity Area as a significant growth corridor where

land will be at a premium. Whilst recognising the importance of the Regional Park for recreation and leisure, we recognise that under-used land in the Regional Park could support growth opportunities with appropriate mitigation to improve access and protect nature conservation, the Special Protection Area and Ramsar. The Authority is shortly to consult on a revised set of strategic policies for its Park Development Framework which will be accompanied by a Habitats Regulations Assessment, the results of which should be considered as part of the evidence base for your draft plan. We would be happy to share this with your team. I would also be happy to meet with you and your team to go through any of the above points.

Thank you for considering our comments.

Yours sincerely,

Stephen Wilkinson

Head of Planning and Strategic Partnerships

User:	The Access Association

Thought needs to be given on making green space, green belt, green infrastructure to allow access for all. Access to green space is shown to have a good effect on people’s mental health. Consideration should be given to encouraging public transport links with green spaces.

User: Bruce Hamilton

I am writing to respond to the Mayor’s draft London Plan consultation.

I am pleased that the draft recognises the importance of green spaces but policies need to be stronger to give them adequate protection, in particular:

- Protecting the Green Belt requires stronger enforcement.
- It should not be possible to ‘swap’ designated Metropolitan Open Land.
- Private and public gardens should be protected alongside other local green and open spaces.
- Policies and funding are needed to improve the quality of green space by reducing noise, light and air pollution, increasing biodiversity, and by giving stronger protection to mature trees and hedgerows.
- Informal and formal outdoor sports facilities, including for ball sports, should be protected and enhanced.
- A more strict approach is needed to reduce reliance on the private car, including reduced parking provision in new developments and promotion of more sustainable transport modes.
- Excessive housing densities in new development should be resisted to protect the local character of London’s neighbourhoods.

Many thanks

User: Mrs Julia Lafene

Re the new plan

Please ensure that:

1. Green belts are preserved. We need our lungs.
2. New developments have spaces for gardens, trees and plav spaces and allotments too.
3. Brownfield sites are rehabilitated to provide housing. This may cost more than using green land, but in the end it will be cost-effective as people will be happier and healthier if they have places to go outdoors, especially children. Also the air will be cleaner if pollution absorbing greenery is planted.

User: Dr Eric Toni

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• A more strict approach is needed to reduce reliance on the private car, including reduced parking provision in new developments and promotion of more sustainable transport modes.
• Excessive housing densities in new development should be resisted to protect the local character of London’s neighbourhoods.

User: Alison Homewood

Dear Mr Khan,

The London Plan will be the biggest single influence on the future development of our city for many years. Please help us make it as green as possible!

User: London Food LInk /Sustain

As Sustain has highlighted in previous consultations, there needs to be more recognition and link of the role that food growing and productive green space can have on physical and mental health. In particular G8 needs to be reworded; whilst food growing is mentioned in a few places, it does not receive the coverage it deserves in regards to its current and potential role in delivering multiple benefits including:

- Healthy food, with lower greenhouse gas emissions
- Opportunities for connection with nature and activity promoting mental health
- Increased resilience through development of localised food systems
- Recreational and skills development
- Contribution to biodiversity

The current large number of Londoners involved and the multiple benefits that food growing projects have provided for the city deserves increased recognition and protection; without these spaces London would be a much less green and biodiverse city, as data continues to show from the Capital Growth programme, supported by the Mayor of London, London Food Strategy and previous London Plan.

We would like to see more links made between the Greenbelt and potential for peri-urban agriculture, horticulture and orchards. We believe that a productive Greenbelt would be protected, rather than being left and therefore targeted for future development. Moreover, the application of organic and permaculture techniques for food growing could contribute significantly to biodiversity, soil retention, carbon sequestration and water management.

User: Roland Wallace

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- A more strict approach is needed to reduce reliance on the private car, including reduced parking provision in new developments and promotion of more sustainable transport modes.
- Excessive housing densities in new development should be resisted to protect the local character of London’s neighbourhoods.

User: Nigel Paris

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• Informal and formal outdoor sports facilities, including for ball sports, should be protected and enhanced.
• A more strict approach is needed to reduce reliance on the private car, including reduced parking provision in new developments and promotion of more sustainable transport modes.
• Excessive housing densities in new development should be resisted to protect the local character of London’s neighbourhoods.”

User: Patrick Curry

Dear Consultation Team,

I am writing to respond to the draft London Plan consultation. I am pleased that the draft recognises the importance of green spaces but I am concerned about some of its flaws. In particular, certain policies' protection need to be much more robust:

- Protecting the Green Belt requires stronger enforcement.
- It should not be possible to ‘swap’ designated Metropolitan Open Land.
- Private and public gardens should be protected alongside other local green and open spaces.
- Policies and funding are needed to improve the quality of green space by reducing noise, light and air pollution, increasing biodiversity, and by giving stronger protection to mature trees and hedgerows.
- Informal and formal outdoor sports facilities, including for ball sports, should be protected and enhanced.
- A more strict approach is needed to reduce reliance on the private car, including reduced parking provision in new developments and promotion of more sustainable transport modes.
- Excessive housing densities in new development should be resisted to protect the local character of London’s neighbourhoods.

User:	Diocese of Southwark

The Diocese of Southwark supports the protection of London's green and open spaces and asks the Mayor to include the protection of cemeteries and churchyards in the policies for green infrastructure and natural environment.

User:	London Assembly Green Party Group

The draft London Plan takes steps for the continued protection of London’s Green Belt and Metropolitan Open Land, but it is not strong enough on protecting the full range of green spaces, putting at risk targets for making London 50 per cent green, and threatening biodiversity.

User: Alan Simpson

I am writing to respond to the draft London Plan consultation. I am pleased that the draft recognises the importance of green spaces but policies need to be stronger to give them adequate protection, in particular:

- Protecting the Green Belt requires stronger enforcement.
- It should not be possible to ‘swap’ designated Metropolitan Open Land.
- Private and public gardens should be protected alongside other local green and open spaces.
- Policies and funding are needed to improve the quality of green space by reducing noise, light and air pollution, increasing biodiversity, and by giving stronger protection to mature trees and hedgerows.
- Informal and formal outdoor sports facilities, including for ball sports, should be protected and enhanced.
- A more strict approach is needed to reduce reliance on the private car, including reduced parking provision in new developments and promotion of more sustainable transport modes.
- Excessive housing densities in new development should be resisted to protect the local character of London’s neighbourhoods.

I welcome Policy G2 and particularly the proposal in Policy G2B that ‘de-designation’ of Green Belt will not be supported. This policy needs to be reinforced for it to be effective. **Proposed change:** A presumption against the alteration of Green Belt boundaries which reduce its extent should be included in policy G2B so that it reads: **‘The extension of the Green Belt will be supported and its de-designation will not. We will enforce a presumption against the loss of Green Belt’.**

I welcome recognition that Metropolitan Open Land (MOL) should be protected from inappropriate development but this policy is undermined by Policy G3 C and the provision to allow ‘land swaps’ because MOL is characterised by its 'permanence'. **Proposed changes:** Policy G3 C should be deleted along with the sentence in paragraph 8.3.2 “The principle of land swaps could be applied to MOL where the resulting MOL meets at least one of the criteria set out in part D of this policy”. Policy G3B should be amended to read: **‘The extension of MOL designations should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.’**

I am concerned that Policy G4 contains insufficient recognition of the contribution of private gardens to the extent of green space. A policy is needed to prevent extensive ‘garden grabbing’. **Proposed change:** Policy G4 A should be revised to include reference to private gardens to read: **‘Local green and open spaces, including public and private gardens, should be protected’.**

I welcome support for the creation of new areas of accessible green and open space. These provisions should be strengthened by requiring measures in Policy G4 to improve the quality of green space.
Proposed change

- **Policy G4 C – should read “Assessments should identify areas of public green and open space deficiency, including an assessment of deficiency in quality, taking account of Green Flag criteria, noise and air pollution, and** using the categorisation set out in Table 8.1 as a benchmark for all the different types required.”
- Policy G4 E 1) should include at the end **‘including an assessment of, and where appropriate a plan, to improve the quality of the space’**.

The policy on noise should make explicit reference to the need to reduce the impacts of noise on green space, and other relevant policies amended accordingly. **Proposed change:** Additions should be made to Policy D13 Noise as follows:

- Para B: Boroughs [etc] should identify and nominate new Quiet Areas and protect existing Quiet Areas in line with the procedure in Defra’s Noise Action Plan for Agglomerations **and ensure local green space is improved in line with Policy G4 (as amended) including by:**

- **taking action to reduce traffic noise around parks which are severely impacted by traffic noise and pollution, using such measures as temporary/weekend street closures and/or permanent re-routing of traffic; or introducing natural or man-made noise barriers.**

The provision and improvement of green space requires funding to help deliver the Mayor's aspirations for 'good growth' and increasing London's green cover and should be addressed in Policy DF1. **Proposed change:** Policy DF1 D (2) should be amended to read as follows: 'Recognise the importance of affordable workspace and culture and leisure facilities, **including public green and open space,** in delivering good growth.'

The 'Urban Greening Factor' outlined in Policy G5 does not address the human use of green space and overlooks qualitative considerations and a wealth of knowledge about how people use green spaces and how design can enhance their experience. **Proposed change:** Policy G5 – a further sub-section should be added as follows: **(C) Urban greening required and delivered in new developments will be additional to requirements to provide adequate green and open space as set out in G4. New developments must allow for provision of new green and open space in addition to meeting urban greening requirements.**

The approach to biodiversity and access to nature outlined in Policy G6 needs to be strengthened to avoid the loss of valuable habitats and wildlife. **Proposed change:** Policy G6 – The second sentence in sub-section A of this policy should be deleted, along with the whole of sub-section C. The following sentence should be added at the start of sub-section D **'All new development should seek to achieve a net gain in biodiversity.**'

Mature trees are a vital part of London's green infrastructure and there should be strict controls over felling them in Policy G7, along with recognition of the importance of established hedgerows. **Proposed changes:**
The value of hedgerows should be recognised in subsection B 1) of Policy 7 by amending it to 'protect 'veteran' trees, **mature hedgerows** and ancient woodland,,,'. The first sentence of Policy G7(C) should be amended so it reads as follows: "Development proposals should ensure that existing trees of quality**, mature trees and hedgerows, and trees of value in terms of delivering eco-system services such as water or air quality management,** are retained.

Policy SD1 on Opportunity Areas should require sufficient space for the amenities usually provided by parks, in particular playing fields and courts for open air sport. **Proposed change:** Policy SD1 B(3) should be amended to read 'plan for and provide the necessary social and other infrastructure to sustain growth, working with infrastructure providers where necessary, **and ensuring open and green space is planned to accommodate informal and formal outdoor sports.**

A decline in the quality of use of sports facilities is often used as an excuse for allowing development of public open spaces which needs to be addressed in policy S5. **Proposed change**: S5 B(4) This should be amended to read: "ensure that there is no net loss of facilities. **If there is evidence that ongoing or future demand for sports means facilities are under-used measures should be taken to ensure demand is promoted through a local sports strategy or to repurpose the space for an outdoor sport for which there is demand."**

The plan seeks to further restrict car parking in new development and to reframe the link to PTAL. Allowing excessive car parking in Policy T4 is inconsistent with the main transport policies which seek to reduce car trips. **Proposed changes:**

- The following amendments should be made to Policy T4(C) – 'Where appropriate' should be deleted and Policy T4(D) should be changed to read "..planning permission may **will** be contingent on the provision of necessary public transport and active travel infrastructure."
- Table 10.3 - The bottom four rows should be amended so that the maximum parking provision in a development in any area (whatever the PTAL) is 0.3 spaces per unit.
- Paragraph 10.4.4 – the word 'Ideally' should be deleted and the sentence reworded as follows: "Ideally New development **of all sizes, but in particular** that **which** will give rise to significant numbers of new trips**,** should be located in places well-connected with public transport…"
- Policy T6 H: should be amended to read "Boroughs wishing to adopt borough-wide or other area-based car-free policies will be supported. *[Delete the outer London caveat sentences.]* Minimum standards are not appropriate for **residential or** non-residential land uses in any part of London."

We welcome the overarching policy GG2 concerning making the best use of land. This should be strengthened by reference in policy H1 to making use of excessive or redundant road space.
Proposed change: Policy H1 B2d) should be amended to include reference to excessive or redundant road space and other car-related infrastructure so that it reads **'the redevelopment of surplus utilities and public sector owned sites, including excessive or redundant road space.'**

We broadly welcome policies D1 to D6 in the draft London Plan which seek to improve the design and land use efficiency of new housing. We believe policy D6 concerning the optimisation of housing density needs to be amended to avoid a lack of associated public infrastructure, and excessive housing densities and 'town cramming'.. **Proposed changes:** The phrase 'in exceptional circumstances' should be deleted from the last sentence in Policy D6B 3) so that it reads **'This may mean that development is contingent on the provision of necessary infrastructure and public transport services…'**. The density levels specified in Policy D6C should be amended to 80, 170 and 260 units per hectare respectively so that it reads: **' 1) 80 units per hectare in areas of PTAL 0-1; or 2) 170 units per hectare in areas of PTAL 2 to 3; or 3) 260 units per hectare in areas of PTAL 4 to 6'**.

The draft Plan gives insufficient consideration to the protection and enhancement of London's diverse local character. Policies D1 and and HC1 need to be amended to ensure that greater attention is given to the character map of London, and community or neighbourhood plans, in planning and designing new development. **Proposed changes:** The first sentence of Policy D1 'London's form and characteristics' should be amended to make specific reference to neighbourhood and community plans so that it reads **'Development Plans, area-based strategies, neighbourhood and community plans. and development proposals should address the following:'** The phrase **'reflect and enhance local character and distinctiveness'** should be added to the list after 1) in Policy D1A.
The first sentence of Policy HC1 'Heritage conservation and growth' should be revised so that it reads: '**Boroughs should, in consultation with Historic England, other relevant statutory organisations and local community and neighbourhood planning groups, develop evidence that demonstrates a clear understanding of London's historic environment, local character and distinctiveness.**'

User:	Mrs Seonaid Royall

this policy does not go far enough to support and encourage food growing and faring within metropolitan land and the Green Belt, despite the evidence of its multiple benefits.

User: Mrs Belinda Taylor

Policy G8:

This policy does not go far enough to support and encourage food growing within metropolitan land and the Green Belt, despite the evidence of the multiple benefits and cost savings to society in health, crime reduction etc

London’s resources of land and soil for agriculture, horticulture, orchards and private and community gardens should be protected, planned for, designed and managed as integrated features of a healthy city and green infrastructure. In major developments, the Mayor will require space for the cultivation of food in order to create a greener and more resilient city.

User: John Tyrrell

I am writing to respond to the draft London Plan consultation. I am pleased that the draft recognises the importance of green spaces but policies need to be stronger to give them adequate protection, in particular:

- Protecting the Green Belt requires stronger enforcement.
- It should not be possible to ‘swap’ designated Metropolitan Open Land.
- Private and public gardens should be protected alongside other local green and open spaces.
- Policies and funding are needed to improve the quality of green space by reducing noise, light and air pollution, increasing biodiversity, and by giving stronger protection to mature trees and hedgerows.
- Informal and formal outdoor sports facilities, including for ball sports, should be protected and enhanced.
- A more strict approach is needed to reduce reliance on the private car, including reduced parking provision in new developments and promotion of more sustainable transport modes.
- Excessive housing densities in new development should be resisted to protect the local character of London’s neighbourhoods.

User: Andrew Motion

I'm glad the draft London Plan recognises the importance of green spaces, but policies need to be stronger to give the necessary protection. In particular:

there need to be stronger measures to enforce the Green Belt;

it should not be possible to swap designated Metropolitan Land;

policies need to be stronger to reduce noise, light and air pollution, to increase biodiversity and to protect trees and hedges;

policies need to be stronger to improve public transport and reduce the use of private cars;

excessive housing densities in new developments should be resisted, to protect the character of London's neighbourhoods.

User: Ms Paula Ingram

I am pleased to see that a section of the plan has been given over to protecting the green areas of London, and that is it quite detailed and includes Metropolitan open land private green spaces as well.

I am aware that there is huge pressure, in particular from developers wanting to build on green belt land purely for profit (not for any real benefit to the population as this tends to be high end housing). I urge the Mayor to stand firm on this point. Destroying the Green belt is neither desirable nor necessary to address the housing problem in London and attempts to morally and emotionally blackmail the popupulation into believing otherwise must be firmly resisted.

Regarding private green space, there is a rash of development proposals wanting to use people's back gardens and amenity space to build inappropriately. I feel the rules around this, whilst in the plan, need to be more robust with a clear principle against this kind of development, which again is rarely offering 'affordable' housing but designed purely for profit.

I am concerned that the rules around 'swaps' where one piece of green land is freed up in exchange for building on another, are too weak. The requirements for the new piece of land only require one of a number of criteria to be met, which will inevitably open the door for reduced quality and amenity value in an arrangement like this.

In these times when the city is growing and pollution and congestion are major challenges, the need to preserve and develop green space, trees and the wildlife that accompany them has never been greater. I urge the Mayor in the strongest terms to stand by his proposals, make them as robust as possible, and to resist any attempts to water them down.

User: The Royal Parks

G1 Green infrastructure

TRP notes the target of increasing London's green cover from 47% to 50%. Guidance on achieving this target should focus on the quality and biodiversity of the additional green space and the public's access to it. While green roofs may have an important contribution to make, a growing population needs more publically accessible amenity space.

G3 Metropolitan Open Land

TRP strongly supports an increase in designated Metropolitan Open Land and enhancement and protection of existing additional spaces.

G4 Local green and open space

TRP agrees with the proposal to protect and enhance local green and open space and to improve access.

G5 Urban greening

More emphasis should be placed on the quality and diversity of the planting to ensure a range of bio-diverse habitats. Measures need to be introduced to ensure the long term upkeep of any improved habitats.

G6 Biodiversity and access to nature

This policy should include more focus on the role of green infrastructure and natural water systems in helping to make the city more resilient to impacts from climate change and other severe natural events.

We recommend that some spatial illustrations of the city's green space, including the Parks hierarchy and wildlife sites (SINCs) need inclusion.

We are concerned that delivering housing demand through multiple small-scale developments, primarily in the suburbs and in and around town centres may impact on existing green space connectivity and lead to intensification of use of existing parks and open spaces.

We believe that the policies regarding water use, water management and water bodies need to be strengthened. We are concerned that there is no reference to Heathrow's potential expansion, which will lead to significant impact on The Longford River (and Duke of Northumberland's River) in West London.

G7 Trees and woodlands

We recommend that tree and woodland strategies should include the management of pests and diseases, which present a serious threat to London's tree stock.

User: Anthony Howe

I am writing about the draft London Plan consultation, which I am pleased recognises how important green spaces are. However, I want to ensure emphasis is placed to protect them e.g.

- Stronger enforcement to protect the Green Belt.
- Not allow the ‘swap’ of designated Metropolitan Open Land.
- Private and public gardens should be protected alongside other local green and open spaces.
- Policies are needed to improve the quality of green space by reducing noise, light and air pollution, increasing biodiversity, and by giving stronger protection to mature trees and hedgerows.
- Informal and formal outdoor sports facilities, including for ball sports, should be protected and enhanced.
- More quickly reduce the reliance on the private transport by reducing parking provision in new developments and promote sustainable transport modes.
- Excessive housing densities in new development should be resisted to protect the local character of London’s neighbourhoods.

User: Jason Cooper

With reference to the London Plan consultation I wish to respond as follows.

The urban landscape of any city is hugely improved by trees. There are beautiful in themselves but a wonderful visual foil to the buildings and open spaces that make up their fabric; they move allowing dappled light to filter through their leaves; and the very sight and sound of them do much to refresh our flagging spirits. Practically, they provide shade and ground cover; absorb and release water vapour so cooling our streets; absorb carbon dioxide and replace it with oxygen; provide habitats for birds and wildlife; shelter from rain. It is a wonder that something requiring so little can do so much. One of the most characteristic things that the loveliest parts London has to offer is its trees - those without them feel like urban deserts in comparison - and I can think of no single feature of our city that is more important to providing a healthy environment for its people. Please may I urge you all to do all you can to plant as many as you can, to insist on new developments planting them as often as possible, and to guard against any further erosion in the green spaces of our wonderful city. I agree with every one of the sections that follow, and I hope and pray that you will do all you can to encourage the planting of trees wherever you can.

In the sections listed below (in the same order as they appear in the draft London Plan).

- Paragraph 1.3.3. Recommend an addition (in CAPS) to the following sentence: “Access to green and open spaces, including waterways AND TREES, can improve health, but access varies widely across the city.”
- Paragraph 3.9.5. I support the inclusion of “Protection for trees” as an issue in the amplification of potential negative impacts of large-scale basement development beneath existing buildings.
- Policy H1. Increasing housing supply. I recommend that Sentence B2)d is clarified so that “public sector owned sites” will not include woodland, parks and open spaces.
- Paragraph 4.2.9. I support the principle of “no net loss of overall green cover” as a result of small housing developments, and support “off-site provision such as new street trees” in order to achieve this principle. I recommend an addition (in CAPS) to the following sentence: "Loss of existing biodiversity OR GREEN SPACE, as a result of small housing developments, should be mitigated through measures such as the installation of green roofs, the provision of landscaping that facilitates sustainable urban drainage, or off-site provision such as new street trees in order to achieve the principle of no net loss of overall green cover. Rainwater attenuation features should be incorporated to achieve greenfield run off rates. LOSS OF ANY PUBLIC GREEN SPACE WILL BE COMPENSATED FOR WITH ALTERNATIVE ACCESSIBLE SITES.”
- Policy S4. Play and informal recreation. I support section B2)d, that residential development proposals for schemes that are likely to be used by children and young people should incorporate good-quality, accessible play provision for all ages, of at least 10 square metres per child that: “incorporates trees and/or other forms of greenery”.
- Policy G1. Green infrastructure. I support this policy, and subsequent narrative that mentions the important role of trees.
- Policy G5. Urban greening. I support this policy, including the recommended Urban Green Space Factor, and subsequent narrative that mentions the important role of trees. I support the inclusion of the role and weighting for woodland and trees in Table 8.2 - Urban Greening Factors. I recommend including a reference to Residential Development and Trees (Woodland Trust, 2015, woodlandtrust.org.uk/residentialdevelopments).
- Policy G6. Biodiversity and access to nature. I support this policy. I recommend that Sites of Metropolitan Importance and all ancient woodlands are added to the categories of planning applications that must be referred to the Mayor.
- Policy G7. Trees and woodlands. I support this policy. I recommend that Section B)1 is strengthened as follows (amendments in CAPS): “GIVE THE STRONGEST POSSIBLE protectION TO ‘veteran’ trees and ancient woodland, ESPECIALLY where these are not already part of a protected site”. I support the subsequent narrative on the role of trees, particularly paragraphs 8.71 – 8.73. I recommend referring London boroughs to guidance on ancient woodland and veteran trees: Planners’ manual for ancient woodland and veteran trees(Woodland Trust, 2017, woodlandtrust.org.uk/plannersmanual).

Please accept this my formal response to the consultation.

User: MORA - Monks Orchard Residents Association

The removal of protection against “Back Garden Development” is contrary to National Policy (NPPF para 53).

Chapter 8 Green Infrastructure and Natural Environment claims to increase “Green Belt Protection” but the measures announced do not change existing protections.

User:	School Food Matters

This policy does not go far enough to support and encourage food growing and farming within metropolitan land and the Green Belt, despite the evidence of its multiple benefits.

User: Home Builders Federation

Chapter 8: Green Infrastructure and natural environment: Policy G2: London's Green Belt

The policy is unsound because it conflicts with national policy.

The NPPF requires local planning authorities to establish their Green Belt through the preparation of Local Plans (NPPF, paragraph 83). This allows for Green Belt boundaries to be altered in exceptional circumstances through the preparation or review of the Local Plan.

The draft London Plan – going further than the current London Plan (as well as previous iterations) – removes this ability by stating that de-designation will not be supported.

We do not agree that the Mayor can remove the ability of local planning authorities to review their Green Belt, including the potential for de-designation, through the draft London Plan. Nor do we consider that the Mayor's planning powers extend to the extent that he can remove this option through the draft London Plan.

The London Plan is not a Local Plan as the Mayor is anxious to remind people. The Mayor, therefore, cannot remove requirements of national planning policy that relate to Local Plan making that local planning authorities will need to consider when they are planning for the development needs of their area. There may be exceptional circumstances where a London LPA decides that the re-drawing of the Green Belt is necessary and justified to accommodate development needs in a sustainable way. The NPPF allows a local planning authority to do this through its Local Plan (NPPF, paragraph 83). While the Mayor may set strategic policies that aim to reduce the likelihood of Green Belt being amended, it is for each local planning authority to decide the most sustainable approach to delivering development in its area. As with the Duty to Cooperate, it is for each local authority to consider how its development needs can best be accommodated when preparing its Local Plan.

The Mayor could only remove this discretion if all the London LPAs voluntarily agreed that he should undertake this function collectively on their behalf. Even then, the Mayor would only be able to define the broad extent of the Belt. When the Green Belt was first established through County Structure Plans the extent of the Belt still had to be defined in the Development Plans. Only the Local Plan can define the extent of the Green Belt.

To be able to make policy on the Green Belt for Local Plans – in order for the Mayor to definitively rule-out the possibility of the release of Green Belt land during the life of the London Plan – the Mayor would have to undertake a strategic Green Belt review of all of London's Green Belt in order to define its boundary (NPPF, paragraph 81). Any enhancement activities relating to the Green Belt, such as those described in part A 2) of the policy, could only occur once the Green Belt has been defined. However, because the Mayor has not defined the Green Belt, he cannot direct that Green Belt is amended, or not amended, through the draft London Plan. This is the responsibility of each local planning authority with a Green Belt. It is they who will have to decide how best to meet their development needs in the most sustainable way. Moreover, it is they who will have to agree Green Belt boundaries with their neighbouring authorities in the WSE.

A related but secondary point, is that the review of the Green Belt cannot be a one-way process as the current draft policy implies. The Mayor is wrong in arguing in part B that the Green Belt can be increased but not decreased, or, that Green Belt release can be compensated for by new designations elsewhere. The Mayor could only conclude that the Green Belt could be increased and new designations made after having undertaken a strategic Green Belt review which defines the Green Belt in the draft London Plan. Until he has done so, and until he has the authority to do so, the London boroughs cannot be fettered in this way. They are responsible for defining the Green Belts through their statutory Local Plans, not the Mayor.

Furthermore, a strategic Green Belt review would need to involve a conversation with some of the authorities of the Wider South East (WSE) because the delineation of the Green Belt boundary might have to involve discussions with those WSE authorities who occupy the outer edge of the Metropolitan Green Belt, and where they may be effected by any decisions on the location of development. These WSE authorities may want to release Green Belt land to meet their housing needs. The Mayor's policy fetters them in this respect as they may need to define a new Green Belt boundary with the cooperation of the London boroughs. The Mayor does not have the authority to fetter the authorities of the WSE in this way.

This then raises a further point. Because the Mayor is not responsible for the Duty to Cooperate (although he ought to be if the draft London Plan was truly a strategic plan) he cannot make policy on the Green Belt in any reasonable or practical sense. He cannot make policy on the Green Belt in any reasonable or practical sense because he is unable to manage the strategic cross boundary discussions with the WSE that would need to occur through the Duty to Cooperate if the Green Belt was to be altered. Because, they Mayor claims he is not lawfully responsible for the Duty to Cooperate, he cannot shape policy on the Green Belt. If the Mayor wishes to make policy on the Green Belt he must assume responsibility for the Duty to Cooperate (on behalf of all 35 LPAs of London). This is because the Duty to Cooperate would have to be engaged as a consequence of an LPA in the WSE wishing to amend its Green Belt boundary.

Part B of the policy, therefore, should be re-drafted to reflect the national policy:

"B In preparing their Local Plans the Boroughs will:

1) extend the Green Belt in exceptional circumstances;

2) de-designate land in the Green Belt in exceptional circumstances."

Better still, because the suggested amendments add nothing of substance, because the Mayor has no remit here, it should be deleted.

This all points to the major failing with the draft London Plan. It is not a strategic spatial plan at all. It is just a big local plan that interferes too much in the detail of the work of the London boroughs.

Policy G3: Metropolitan Open Land

The policy is unsound in part because it conflicts with national policy.

In contrast to the policy on the Green Belt the policy for the Metropolitan Open Land (MOL) is better since part C refers to alterations of the MOL boundaries through the Local plan process. MOL is treated as equivalent to the Green Belt. Therefore it must be subject to the same planning disciplines as apply to Green Belt land. Part B should be amended so that extension of the MOL can only be made through a Local Plan:

"B The extension of MOL designations should be supported where appropriate undertaken through the Local Plan process."

Part D should be amended so that the draft London Plan is clear that designation of new MOL should only occur through the Local Plan process:

"D Boroughs should designate MOL through the Local Plan process by…"

Policy G4: Local green and open space

The policy is unsound because it conflicts with national policy.

Paragraph 76 of the NPPF describes how the designation of Local Green Space is a matter for local authorities to determine as they prepare Local Plans and Neighbourhood Plans. The draft London Plan should not attempt to fetter the work of LPAs in this respect. This is not a strategic matter where it is appropriate for the Mayor to shape policy.

The Greater London Authority Act, 1999 in Part VIII, Section 334, (5) states that: *"The spatial development strategy must deal only with matters which are of strategic importance to Greater London".* While this could – and has – been interpreted widely, policy on Local Green Spaces is clearly a non-strategic matter.

NPPF, paragraph 76 states that "Local Green Spaces should only be designated when a plan is prepared or reviewed". Part B of the draft London Plan, as currently worded, does not reflect this requirement of national policy. In so far as the Mayor should have any remit in this area – and we do not believe that he has – Part B should be re-drafted to read:

"B The designation of new areas of publicly accessible Local Green Space should be undertaken through the preparation or review of the Local Plan."

Policy G5: Urban greening

The policy is unsound because it is ineffective.

Part B of the policy requires the London LPAs to develop an Urban Greening Factor (UGF) to identify the most appropriate amount of urban greening required in new developments. First, this is really a local matter and we do not think it is appropriate for the Mayor to formulate policy in this area. The Greater London Authority Act, 1999 in Section VIII, Sub-section 334, (5) states that: *"The spatial development strategy must deal only with matters which are of strategic importance to Greater London".* While this could – and has – been interpreted widely, policy on measures to support urban greening is clearly a non-strategic matter.

Second, the introduction of a local policy on Urban Greening and the adoption of an Urban Greening Factor could only be introduced through the Local Plan to ensure that any requirements are proportionate, reflect viability and do not jeopardise housing delivery (NPPF, paragraph 153). As part of the Local Plan preparation, the London LPAs would also need to consider whether it is appropriate, and viable, to apply the UGF to non-major applications, as paragraph 8.5.3 of the draft London Plan discusses.

The policy should be amended to reflect this. Part B should be re-worded to read:

"B Through their Local Plan Boroughs should develop an Urban Greening Factor…".

User:	Butterfly Conservation

General comments on Chapter 8
? Given the pressures from development, green spaces need greater levels of protection, preferably statutory.
? Overall, there needs to be more clarity on implementation. The Mayor can be more directive in his language, e.g. using ‘must’ instead of ‘should’.
? We believe that there should be more emphasis on biodiversity as a key component of green infrastructure, and as an unquantifiable element of natural capital.

User: Royal Borough of Kensington and Chelsea

Contaminated Land

A policy addressing the health impacts of contaminated land has been omitted from the draft new London Plan. A policy exists in the current London Plan and should be carried forward. The comments below are relevant for development, particularly for matters covered in chapters 1, 2, 3, 4, 5, and 8.

As stated, the current policy on contaminated land (Policy 5.21 Contaminated Land) in the London Plan is missing in the draft new London Plan. There are passing references to contamination for basement developments (Policy D9), Food growing (Policy G8) and Hydraulic Fracking (Policy SI11) in the draft new London Plan, but no comprehensive policy that recognises the importance of addressing the health and environmental risks posed by land contamination as part of developing a growing city. There has always been a land contamination policy within the London Plan in consideration of London's industrial past and thousands of potentially contaminated sites across the city. Its absence is also inconsistent with information set out in the evidence base documents (See IIA and Scoping report comments above) for the draft new London Plan.

It is crucial the final new London Plan continues to include a policy to address land contamination as part of a plan integrating different policy areas on how housing, social, economic, cultural, environmental and transport policies achieve maximum health impacts and benefits for Londoners as supported by the evidence base.

It is recommended at the very least the current London Plan policy for 'Contaminated Land' Policy 5.21 and supporting text is reinstated.

The Health Impact Assessment (HIA) identified in the Integrated Impact Assessment (IIA) and its Scoping Report state that there is a need to 'minimise the risk of health impacts through contamination.' However, this issue is not carried forward into the Objectives on which the draft new London Plan is based. The result is that the draft new London Plan does not fully consider the risk to health from contaminated land which potentially puts Londoners' and the wider environment at risk at developments where potential contamination exists and where there is a sensitive end use.

The omission of a policy to address contaminated land in a Spatial Development Strategy is of particular concern to London boroughs where the Mayor has direct control over development (i.e. the OPDC) and could allow redevelopment that does not comply with the borough's local plans.

Integrated Impact Assessment (IIA) Consultation Document (including the IIA Scoping Report) 35

Contaminated land

The Scoping Report identifies the need to assess and remediate contaminated land in order to address risks to health and the wider environment as part of the planning process. See section 5.22.8 which states 'An assessment of the risks associated with developing contaminated or potentially contaminated land is therefore essential to inform decisions about the appropriate level of treatment, clean up or remediation that may be required.' However, this issue was not carried forward in the objectives identified in the IIA Framework.

In the IIA Framework, under the topic of 'Geology and Soils' – the HIA guide question: 'Will the strategy minimise the risk of health impacts through contamination' is not addressed by the corresponding Objective 22 which looks solely to conserve and protect the soil itself and not human health; it states 'To conserve London's geodiversity and protect soils from development and over intensive use.'

As a result of this, the need to address the HIA question and the relevant health and environmental risks identified in the Scoping Report has not been carried forward into the formation of policies in the draft new London Plan.

The summary of the most relevant plans and programmes in Appendix B of the Scoping Report is missing a reference to the NPPF policies on land contamination and remediation as well as contaminated land regulations for England.

The IIA omission to put forward a policy to address contaminated land in a Spatial Development Strategy is of particular concern to London boroughs where the Mayor has direct control over development (i.e. the OPDC) and could allow redevelopment that does not comply with the borough's local plans, etc.

The IIA needs to be updated to include an assessment of the land contamination and remediation addressing assessment guide questions, to ensure objective 22 address both contamination remediation and geodiversity.

User: Trees and Design Action Group

Chapter 8 – Green Infrastructure and Natural Environment

Policy G1 Green Infrastructure

Paragraph 8.1.1 **… network of green spaces, street trees, green roofs and other major assets such as natural or semi-natural drainage features must be planned, designed and managed in a more integrated way to meet multiple objectives including: promoting mental and physical health and wellbeing; *supporting learning and development in children and adults*, adapting to the impacts of climate change; improving air and water quality; encouraging walking and cycling; and conserving and enhancing biodiversity and ecological resilience alongside more traditional functions of green space such as play, sport and recreation.**

Policy G5 Urban greening

We welcome the specific inclusion of trees in the policy section A, as new development offers vital opportunities to maintain and increase the urban forest population and its contribution to resilience, health, wellbeing and good place-making. We also welcome the reference to TDAG's publication Trees in Hard Landscapes in Table 8.2

Policy G7 Trees and woodlands

Trees have a finite life and the Mayor's intention to increase tree cover by 10% by 2050 make it essential that new development should provide for new tree planting wherever possible. TDAG would welcome the additional weight that would be given to inclusion of its guidance on urban trees within the policy, rather than simply in the supporting text at 8.7.2. We therefore propose an amendment to C as below:

C. **Development proposals should ensure that*, wherever possible,* existing trees of quality are retained (FN 108). If it is imperative that trees have to be removed, there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT. The planting of additional trees should *wherever possible* be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy. *When preparing more detailed planning guidance boroughs should refer to the Forestry Commission's Right Trees for a Changing Climate (FN 110) and guidance produced by the Trees and Design Action Group (FN 111), a multi-disciplinary cross-partnership forum seeking to promote urban forests, including the forthcoming online guide: Species Selection for Green Infrastructure.***

TDAG would similarly wish to see the Policy include an explicit requirement (as in the previous 2011 London Plan Policy 7.2.1) for Boroughs to produce tree strategies as part of their Green Infrastructure strategies (referred to in Policy G1), rather than this being simply included in the supporting text at 8.7.1. We therefore propose an addition policy requirement as below:

D. Boroughs should produce a Tree Strategy covering the audit, protection, planting and management of trees and woodland in accordance with the Mayor's SPG Preparing Borough Tree and Woodland Strategies (Feb 2013) and incorporate this within their Green Infrastructure Strategies.

Paragraph 8.7.2 Increase in canopy cover. It is important that canopy cover across Greater London is more consistent to ensure increases in canopy cover in areas of deprivation. Ref. Canopy Cover Report from the Urban FWAC (due for launch 20 March 2018) which recommends 20% canopy cover overall (not average).

User: Kew Society

We support the emphasis on preserving the Green Belt and green open spaces and the ideas for more urban greening. The protection of green areas, for all the reasons set out in this Chapter, is important for both public and privately owned spaces. Intensification of housing should not put the preservation of green areas under threat, including their important role as habitats for wildlife and to increase biodiversity.

A concern is that the loss of open spaces which may well result from high density development would not be mitigated by green roofs and other similar devices – it would partially mitigate air quality but they are not a substitute for public open space. Table 8.1 sets out categories of Public Open Space: one category is green and open spaces which is important at a neighbourhood level.

Policy G5 Urban Greening

This contains welcome policies to support, with targets, urban greening in new developments. Again, though, provision of green roofs does not equate to provision of accessible open space.

Policy G7 Trees and Woodlands

The policy on protecting trees and increasing tree cover by 10% by 2050 is welcome. We wonder if this could not be increased and brought forward if practical.

User: The Royal Society for the Protection of Birds (RSPB)

General comment: Biodiversity should be embedded at the heart of the Green Infrastructure approach so that new and existing green infrastructure is planned, designed and managed with nature in mind, recognising that biodiversity is a key part of the stock of natural capital and green infrastructure, underpinning a variety of benefits to people.

We also recommend that a formal definition of Green Infrastructure is included in policy G1. The definition included in the All London Green Grid document would be suitable:

A network of green spaces - and features such as street trees and green roofs - that is planned, designed and managed to provide a range of benefits, including: recreation and amenity, healthy living, reducing flooding, improving air quality, cooling the urban environment, encouraging walking and cycling, and enhancing biodiversity and ecological resilience.

Suggested amendments to policy G1 [changes in bold, italics]:

B: ‘Boroughs should prepare green infrastructure strategies that integrate objectives relating to open space provision, biodiversity conservation ***and enhancement opportunities, climate change resilience,*** flood management, health and wellbeing, sport and recreation’.

Add a new point to paragraph C: ***seek to protect and enhance the most important green infrastructure assets for their functions through appropriate policies and proposals.***

(Please see full document for more detail)

User:	South East Strategic Leaders

SESL supports the draft Plan's positive approach for more sustainable development that will: reduce carbon emissions and energy demand; increase recycling; and improve the quality of life and access to green space.
The Government's 25-year Environment Plan includes proposals that seek to embed a "net environmental gain" principle for housing and infrastructure development. It says that current policy is for the planning system to provide net gains in biodiversity where possible, but adds that the Government: "will explore strengthening this requirement for planning authorities to ensure environmental net gains across their areas, and will consult on making this mandatory – including any exemptions that may be necessary".
The London Plan should be more strongly aligned with this aspiration, introducing the principle of "environmental net gain" into planning decisions where wider natural capital benefits will be assessed as part of the planning process.
The Government's 25-year Plan aims to use a natural capital approach to protecting and enhancing the environment, by recognising tangible and non-tangible economic benefits. The Government pledges to: "... set gold standards in protecting and growing natural capital – leading the world in using this approach as a tool in decision-making. … take into account the often hidden additional benefits in every aspect of the environment for national wellbeing, health and economic prosperity".
The London Plan needs to give greater weight and emphasis to the natural capital approach as advocated in the Government 25-year Environment Plan with reference to the Mayor's recently published natural capital account for London

User: Eastcote Conservation Panel

Chapter 8 Green Infrastructure and Natural Environment.

The protection of all Green Belt land is essential. Elements of the proposals in this draft plan weaken the policies of the previous plan. The excessive increase in the housing total for the Borough will undoubtedly weaken the policy and will encourage developers to encroach onto Green Belt land. This policy as set out in the previous London Plan should not be changed.

It is not clear what is meant by the terms' enhancement' and 'appropriate multifunctional uses' grey, muddled terminology like this leads to many problems down the line.

The suggested proposal to 'enhance' open spaces e.g. Metropolitan Land is again very weak. There must be strong policies to protect the conservation areas of MoL and other parks from inappropriate developments in the buffer zone around these areas.

As is the Mayor's intention to add extra guidance to the All London Green Grid. These proposals should be on the table now, not a proposal for the future. How can we be expected to comment fully now, unless we know what is to be coming in the future.

The draft plan does not appear to recognise or give any support to protecting green chains. These are vital corridor links between open spaces to allow the migration of wildlife. This omission should be addressed.

Many areas of the built environment are already lacking in nearby open space. The proposals within this draft are set to take away a lot of open space used by the majority of the inhabitants, namely gardens. As the Boroughs are going to be expected to treble their annual rate of dwelling production, where are they supposed to find extra land to produce green open space? This is not at all clear, if in fact it has actually been thought about. One section of this plan contradicts another.

It must be stated again that green roofs/walls/roof gardens/extra street trees are not a substitute for gardens. Gardens bring many advantages for biodiversity, flood risk control, improved air quality etc., which the above proposals cannot bring.

User:	Bromley Friends of the Earth

We are very pleased with the positive policies concerning Reducing Emissions [policy S12], Banning Fracking [policy S1 11] ,Protecting the Green Belt [policy G2 and G3], and Healthy City [policy GG3]

User: Harrow Parks Forum

Harrow Parks Forum is pleased that the draft London Plan recognises the importance of green spaces but considers that policies need to be stronger to give them adequate protection, in particular:

- Protecting the Green Belt, Metropolitan Open Land requires stronger enforcement.
- Designated Open Spaces also require greater protection.
- Private and public gardens should be protected alongside other local green and open spaces.
- Policies and funding are needed to improve the quality of green space by reducing noise, light and air pollution, increasing biodiversity, and by giving stronger protection to mature trees and hedgerows.
- Informal and formal outdoor sports facilities, including for ball sports, should be protected and enhanced.
- Excessive housing densities in new development should be resisted to protect the local character of London’s neighbourhoods.

User: Canary Wharf Group

A general comment these policies are inconsistent with the Mayor's 'Sustainable Design and Construction SPG' and their feasibility and practicality are untested.

The only additional costs accounted for in the evidence base relate to the requirementsof policy SI2. Appendix H of the Technical Report states that, for example, the costs ofadditional urban greening measures for policy G5 have been included in the externalworks costs. However, as the external works costs are based on benchmarks, it is unlikely that the increased requirements of these polices have been properly costed.This also applies to the additional measures required to improve air quality (policy SI1)where it is stated that costs have been tested but no evidence has been provided onthese costs.

User: Environment Agency

We welcome the high profile given to these inter-linked topics, reflecting the importance that the Mayor places on the value of London's green assets as set out in his Vision, and in recent draft Mayoral Strategies, notably his Environment Strategy.

The Plan's policies should support the aims and actions of the Government's 25 year Environment Plan. Therefore, we strongly support the Mayor's commitments to make London at least 50 per cent green by 2050, and the policy proposals linked to this objective, particularly:

- Proposals to develop an 'Urban Greening Factor', and the clarification around how this would work;
- Support for proposals which create new and improved habitats resulting in positive gains for biodiversity;
- Support for a Natural Capital Account for London.

If delivered, we consider these have potential to support the Government's 25 Year Environment Plan's focus on natural capital as key to underpinning economic growth, and its intention that new development should result in 'net environmental gain'.

We will continue to work with the Mayor and others to provide advice and data to ensure opportunities to create and protect green infrastructure are identified. However, we have concerns that meeting the Plan objectives for the natural environment will be challenging in relation to the imperative for growth, particularly in locations where there is limited access to natural green space.

We are largely supportive of policies in this chapter whilst recommending amendments to strengthen some policies, for example, to emphasise the importance of river corridors as key strategic green infrastructure. We also direct your attention also to the responses of Natural England and of the Forestry Commission regarding this chapter.

User:	London Borough of Bromley

The Council supports the policy and welcomes the Mayor’s intention to produce a London Environment Strategy identifying procedures to identify SINCs, Green Corridors and Priority Habitats.

It would be useful for the policy to make reference to the desirability for Local Plans to have policies for the protection of the protected species identified in national and European legislation in order to be comprehensive.

User: London Councils

The efforts to make London a greener city and recognise the many benefits that green infrastructure can bring and the importance of protecting and enhancing the natural environment are supported. Having a strong and thriving natural environment can help boost biodiversity, provide habitats for wildlife and provide space for people to enjoy and spend time which has been shown to improve health and wellbeing. Green infrastructure in urban areas can improve resilience to extreme weather events and poor air quality.

Key to this issue is the intense funding pressures that local authorities and public organisations currently face given they are the key stakeholders for managing and delivery green spaces. Boroughs, in many cases, are stretched beyond capacity which is impacting on their ability to maintain services at current or improved levels. With the competing pressures on land for housing, it is essential that London maintains a large network of high quality green infrastructure to ensure it continues to deliver a wide-range of benefits to society. Overall, boroughs welcome this strong suite of environment policies, which are broadly cross-referenced throughout the Plan. In particular, new policies on the circular economy and air quality, and the strengthened policies on green infrastructure are welcomed. However, there is concern that the reduction in interim targets for the mid-2020s could lead to delayed action on long-range but important transport and climate change targets.

User:	London Borough of Hillingdon

The policies in Chapter 8 seek to protect and retain Green Infrastructure and the natural environment and are generally support. The Council is, however, concerned that the proposed housing target for Hillingdon will result in the development of greenfield sites and the loss of green infrastructure. It is unclear how
additional green infrastructure required to support housing growth will be delivered.

User:	Marion Lerminiaux

I believe that everyone in London has the right to breathe clean air, have access to nature and to benefit from clean energy. I am therefore pleased to see policies in the new London Plan which seek to address these important environmental issues. These include policies to protect our Greenbelt and Metropolitan Open Land, a ban on fracking, and a commitment to London becoming zero carbon.

User:	Marion Lerminiaux

Making London greener is essential for people’s health and wellbeing. Yet many local green spaces face pressure from new development. The Plan must recognise that loss of green space cannot always be made up for through green roofs and sustainable drainage schemes, valuable though these features are (para 4.2.9). Policy should make clear that provision of and access to green space should always be considered when planning new development.

User:	London Borough of Merton

The inclusion of the green infrastructure policy as part of the ‘Green Infrastructure and Natural Environment’ chapter is welcomed. This chapter now groups all of the relevant open spaces and natural environment policies together, providing a more user-friendly structure than the current London Plan.

User: InLinkUK

We support the protection and enhancement of the natural environment in and around London, but also believe it is important that governments and companies consider the overall impact of their activities and not just their localised impacts.

An example of this is that while InLinks give off no local pollutants, from day one every InLink has been powered by 100 per cent carbon free from renewable energy, allowing us to significantly lower our potential ecological footprint overall.

It is essential that the London Plan protects the overall natural environment and not just that contained within the city boundaries.

Recommendation #18

? That all relevant policies within Chapter 8 be updated to ensure environmental considerations relating to London take into account overall ecological impact both within and outside of the city.

User:	Alison Hatt

Green Infrastructure: in view of the above, it will be even more essential to protect London’s green areas and create more for the population to enjoy.

User:	Alison Hatt

I cannot see (although it may be there) any consideration of the benefits and problems of paved front gardens. There are environmental concerns here. While it is good to have vehicles off the road, the reduction in green space, habitats and support for wild life is problematic, as is rainwater drainage. People cannot be co-erced into gardening, but it sits oddly with your desire for people to enjoy green spaces not to include ideas about increasing greener domestic spaces.

User:	Royal Borough of Greenwich

While we support the policies within the chapter, the chapter as a whole would benefit from stronger links to Chapter 8, including clarify that Green Infrastructure and Sustainable Infrastructure and interlinked and mutually supportive. For example, there is little mention within the chapter of natural flood risk management as an effective tool. The chapter feels disjointed in terms of the approach to water and floor risk; it would aid coherency and consistency if policies on water were grouped together.

User:	The Northbank BID

Chapter 8: Green Infrastructure and environment
Plants and trees in the centre of the city are a cherished asset. We are working with business partners, building developers and asset owners to enhance existing and increase greening in the area. We understand the need for suitable management strategy for existing mature tree assets and work proactively with both Westminster City Council and Transport for London to identify suitable management regimes. Local businesses value the benefit trees bring but also wish to be consulted for the best way to manage trees that impact them directly.

We are also working with partners to enhance existing green spaces and identify new ones, including Embankment Evergreen, a green wall at Embankment Station and Victoria Embankment Gardens. We are developing new opportunities for greening at street level, roofs and walls within MAQF and the Aldwych Business LEN. GLA support, expertise, funding and grants are vital bring new projects to hard to deliver locations in central London. This also increases the cumulative effect of green corridors and Urban forest with biodiversity, flora and fauna.

User:	London Borough of Harrow

This chapter should better reflect and integrate with the Government’s 25 Year Environmental Plan.

User: Network Rail

Network Rail acknowledges the need for Green Infrastructure and the need to protect green and open space within London. However, significant Network Rail
owned land has been identified as ‘green allocations’ within the London Plan and within Borough Plans without any regard to the nature of the land. Network Rail land is often operational in nature, which means that it can be cleared at any time if required for operational railway purposes, it is not accessible to the public due to possible safety risks and it has not been properly assessed to understand the ecology and biodiversity quality of the land.

Network Rail should, therefore, be part of discussions at both the Mayor and Borough levels on the assessment of Green Infrastructure and green and open
space. It is particularly important in the context of railway land as it is considered that there are significant opportunities in providing better quality and publicly accessible open space within railway corridors if a proper strategy is put in place. Currently there is over-reliance on out-dated assessments and incomplete information.

User:	London Borough of Enfield

1) Green Belt policy needs to set out a vision/aspiration for its use or purpose. It can be used more productively than it is currently.

2) Natural Capital Accounting needs to be referenced.

3) Value of trees needs to be referenced.

4) Biodiversity policy needs to do more than to just protect SINCs. It needs to protect wildlife/green corridors.

5) Boroughs should set their own Urban Green Factor scores. UGF should be used more widely.

6) Greater recognition to outer London borough in providing many of the high quality green and open space assets for all Londoners to enjoy.

User: Berkeley Group

9. GREEN INFRASTRUCTURE AND NATURAL ENVIRONMENT

9.1. The Green Belt plays an important role in preventing urban sprawl and safeguarding the countryside from encroachment. However, there are significant parts of the green belt that are of poor quality, are not enjoyed by the public but have good accessibility, and could provide much needed new homes as well as amenity space for the benefit of the wider community.

9.2. We support continued protection of the Green Belt, but there should be recognition that sites with no amenity value could be redeveloped to provide high quality new homes and amenity space. 42% of non-environmentally protected Green Belt land is within 2km of a station. A fifth of land within London's boundary is Green Belt. Only 28% of land within London's boundary is built upon, 65% is green. Fourteen boroughs have more land designated as green belt than is built on for housing.

9.3. The Mayor should not seek to prevent boroughs from considering opportunities to release poor quality green belt to deliver new homes, amenities and high quality public space that can be enjoyed by the local community. Indeed, the Mayor should be encouraging the boroughs to do so. Boroughs should be able to review green belt appropriately though the local plan as considered in the NPPF. Policies G2 and G3 should be amended to better reflect the NPPF (paragraphs 82 and 87):

User: National Grid

We have concerns about the approach to the protection of the Green Belt and Metropolitan Open Land (MOL). Policy G2 is very clear, and direct. Unlike the current Plan, it removes the discretion of the London boroughs to remove land from the Green Belt, which in certain contexts might be appropriate.

The London Plan should not be directing local authorities not to review Green Belt and MOL designations when preparing Local Plans and wish to make decisions about how they can best accommodate development requirements. For instance, in recognition that a significant number of previously developed sites are in the Green Belt and on Metropolitan Open Land (MOL), and given the pressing need to deliver housing, National Grid Property proposes that it is a matter for the individual local planning authorities to determine the most appropriate way to meet housing targets that have been identified by the Mayor.

User:	Inclusion London

Chapter 8 Green Infrastructure and Natural Environment

Deaf and Disabled people wish to access green spaces and the natural environment as non-disabled people do, so wheelchair accessible paths are needed and well defined paths are needed so visually impaired people are aware when they are leaving a path and entering rough ground.

User:	Rebecca Rose

Making London greener is essential for people’s health and wellbeing. Yet many local green spaces face pressure from new development. The Plan must recognise that loss of green space cannot always be made up for through green roofs and sustainable drainage schemes, valuable though these features are (para 4.2.9). Policy should make clear that provision of and access to green space should always be considered when planning new development.

User: Just Space

Chapter 8 Green Infrastructure & Natural Environment

Overview

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

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

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

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

Making London a Blue Green City

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

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

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

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

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

Blue Ribbon Network

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

What Needs to be Done:

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

Promoting the functional uses by passenger, ferry and freight transport and protecting it from encroachment will help sustain the BRN for recreation and amenity. Development in the vicinity of the waterside should establish and reflect a relationship with the waterways.

User:	Mr Peter Davies

I am writing to respond to the draft London Plan consultation. Particularly in view of London about to become the world's first national park city, it is so important to protect its great world advantage, that of having so much green space.

User:	Mr Peter Davies

I am pleased that the draft recognises the importance of green spaces but policies need to be stronger to give them adequate protection, in particular: Protecting the Green Belt requires stronger enforcement.

User:	Mr Peter Davies

Policies and funding are needed to improve the quality of green space by reducing noise, light and air pollution, increasing biodiversity, and by giving stronger protection to mature trees and hedgerows.

User: Buckinghamshire and Milton Keynes Natural Environment Partnership

Overall, we welcome the commitment of the draft New London Plan to Green Infrastructure and requiring a network of green spaces, including local green spaces, and its emphasis on urban greening.

However, the London Plan should include a clear statement on its commitment to measurable net biodiversity gain as a result of development, and the need to implement the mitigation hierarchy, as required by the NPPF and NERC Act 2006. We would also welcome urban greening more broadly applied to smaller-scale development to achieve maximum benefits. The Plan should also recognise the importance of protecting other irreplaceable habitats beyond ancient woodland (as is also stated in the NPPF).

We would hope that the collaboration with the wider south east stated in Policy SD2 will also apply in respect of working across administrative boundaries to maximise benefits to and from Green Infrastructure and biodiversity.

User: Gidea Park and District Civic Society

Your strong intention of retaining the Green Belt and Metropolitan Open Land is welcomed, they are an essential element in the character of London, our own Borough Havering in particular. Any proposal to reduce the Green Belt and Metropolitan Open Land should be fiercely resisted. Our Outer London Borough is bounded on 2 sides by open countryside and on a third side by the Thames, these areas act as a green lung for Londoners and in places as a buffer between large developed areas. Sections of the Green Belt extend into urban areas as it does into our own Conservation Area.

We support the provision within urban areas of good quality open places with plenty of greenery it is essential to maintain attractive places in which to live and work. The commitment to protect and also promote green infrastructure is very welcome countering the adverse impact of dominant higher density development.

User:	Mr Jon Halse

As a Londoner for 50 years, I am passionate about London's environment and am delighted you are undertaking this project. I do trust you will take into account the part that London's trees play in protecting it.

User: Chartered Institute of Architectural Technologists

Green Infrastructure and the Natural Environment

London will only flourish if its green spaces are maintained and areas such as the Green Belt are protected with robust and defensible policies that will encourage its use by Londoners and as such we are in agreement with the proposals contained in the plan.

User:	Town and Country Planning Association

The TCPA welcomes the Mayor’s recognition of the value of green infrastructure to the capital and in general strongly supports the proposed policies in Chapter 8. As part of its lead role in a European project – Planning for Environment and Resource Efficiency in European Cities and Towns (PERFECT) – the TCPA aims to support the GLA in helping to promote and implement the green infrastructure policies.

User: London Wildlife Trust

The Mayor's commitment to increased greening is welcome, and overall we support the objectives of the policies within this chapter. The Plan should make greater reference to the importance of the quality as well as the amount of green space.

The New London Plan should set out explicit policy statements for **securing net biodiversity gain**, including commitments to deliver wildlife-rich green spaces to help sustain and enhance biodiversity and provide opportunities for people to connect with nature.

There are also some questions over clarity and consistency across the policies – both within this chapter and across the rest of the Plan.

The New London Plan should also provide a spatial framework for biodiversity, identifying and mapping opportunities to strengthen the connectivity between the SINC network and wider habitats of conservation importance. It is essential the Plan is also underpinned by comprehensive and up-to-date maps of the SINC network and priority habitats; this is currently very variable across London with some boroughs' data over 10 years' old.

If these policies can be strengthened to this effect then together – along with other relevant policies within the Plan - these have **potential to support the Government's 25 Year Environment Plan's focus on natural capital as key to underpinning economic growth** , and its intention that new development should result in 'net environmental gain' (and the NPPF's objectives of "achieving net gains for nature."

One issue of concern is, compared to some of the other chapters, there is only one map – for geodiversity (figure 8.1). We would have expected the Plan to feature at least a number of maps that show:

- Metropolitan Green Belt (based on a current adopted Local Plan maps)
- Metropolitan Open Land (ditto)
- Sites of Importance for Nature Conservation – inc. SPAs, SACs, SSSIs (based on GiGL data)
- Areas of Deficiency of access to nature (ditto)

We believe that the lack of visual illustration of the strategic spread of these environmental assets serves to undermine the recognition of their importance, and suggest that consideration is given to their inclusion.

User:	Richmond Heathrow Campaign

Heathrow we believe is considering increasing flights over London’s open spaces in an attempt to avoid dense populations which risks increased concentration of noise to unacceptable levels in areas around parks. London’s parks provide space for relaxation and enjoyment by a large number of people - both visitors and residents.

We recommend the London Plan extend its consideration of parks and open spaces to include the impact of overhead flight paths taking into account Quiet Areas.

User: Mr Paul McQuillen

I am writing to respond to the draft London Plan consultation. I am pleased that the draft recognises the importance of green spaces but policies need to be stronger to give them adequate protection, in particular:

- Protecting the Green Belt requires stronger enforcement.
- It should not be possible to ‘swap’ designated Metropolitan Open Land.
- Private and public gardens should be protected alongside other local green and open spaces.
- Policies and funding are needed to improve the quality of green space by reducing noise, light and air pollution, increasing biodiversity, and by giving stronger protection to mature trees and hedgerows.
- Informal and formal outdoor sports facilities, including for ball sports, should be protected and enhanced.
- A more strict approach is needed to reduce reliance on the private car, including reduced parking provision in new developments and promotion of more sustainable transport modes.
- Excessive housing densities in new development should be resisted to protect the local character of London’s neighbourhoods.

User:	Barnet Society

CHAPTER 8 – GREEN INFRASTRUCTURE & NATURAL ENVIRONMENT

We particularly welcome this chapter, and especially its recognition of the vital importance of maintenance and value measurement.

User:	Landscape Institute London

LI London broadly supports the policies set out in the Draft London Plan, but are concerned that stronger measures are required to protect the environment to resist pressures on London's open spaces.

In February 2018 the Mayor announced the first National Park City Week (21st-29th July 2018)[1], however there is nothing in the London Plan about opportunities associated with the new National Park City or how it will impact policy.

[1] https://www.london.gov.uk/press-releases/mayoral/call-to-community-groups-to-get-involved

User: London Beekeepers' Association

General comments on Chapter 8 - Green infrastructure and natural environment

? Given the pressures from development - 66,000 new homes per year, every year - green spaces need greater levels of protection, preferably statutory.

? Overall, there needs to be more clarity on implementation. The Mayor can be more directive in his language, e.g. using “must” instead of ”should”.

? We believe that there must be more emphasis on biodiversity as a key component of green infrastructure, and as an unquantifiable element of natural capital.

? We would urge that the Plan seeks to empower individuals to take actions to green the city and encourage biodiversity (in line with the new draft London Environment Strategy). This Plan must work at the “micro” level as well as at the “macro”.

User: Bexley Natural Environment Forum

Chapter 8 Natural Environment – BNEF acknowledges that the Plan accepts that our Natural Environment provides numerous opportunities and benefits to local communities, far beyond which are often recognised. We appreciate that the Plan has the overall commitment to make London 50% green by 2050. However, we still feel that a greater emphasis needs to be put on protection, conservation and suitable sympathetic management of London's green space, particularly when considering the wildlife and biodiversity. Too much 'greening' of a development project is often devoted to the use of non-native plant species or strange exotics, because they are attractive and which have no benefit to native wildlife. We would therefore, like to see included a strong commitment to the use of only native species in new projects.

We are encouraged to see that more tree planting is proposed, but again would like to see a greater commitment to native and locally sourced trees.

As a general comment, we believe that green space needs to be considered holistically on a landscape level across the whole of London and not on an individual site or even just individual borough level. This would involve much cross boundary compliance, but would benefit from the GLA re-establishing a biodiversity group and insisting that boroughs form Biodiversity Partnerships with local groups and enthusiasts, who will often have more knowledge, experience than local council officers. All too often these people are ignored both at the pre-planning and planning stages of a project.

User:	Highgate Society

Object

There is nothing in these policies that mentions gardens or backlands development. This is something which is essential to retain in Conservation Areas, where the character of the area is determined not just by the individual buildings but also their setting. London has a uniquely landscaped setting which makes it attractive as a world city and this should be preserved..

User: Culverley Green Residents' Association

Loss of Open Space

It is appalling that despite a laudable aim of wanting London to be a National Park City and to increase the green cover in London to 50%, in the next breath the Plan implies it is fine to build on open spaces if the development puts in a few street trees, puts in a bit of landscaping or includes green roofs as the green space coverage will not be lost!! This is semantics, more people means a need for more USABLE open space, green roofs are not accessible, usable open space. Our children are getting fatter and exercising less, you are condemning them to a future of less and less areas to play, particularly as all new schools are on constrained sites with virtually no play areas. This plan is prioritising housing growth at the cost of open space, health, and a liveable city. It is a strategic disaster predicated on continuing to prioritise the growth of London at the expense of the rest of the UK and all Londoners will be the poorer for the policies advocated in this plan.

User: Northwoods Voice Limited

Chapter 8 Green Infrastructure and Natural Environment.

NVL has noted, in earlier correspondence to, and meetings with LBH, that it is monitoring environmental pollution in the Green Lane Conservation Area and has been so doing for several years now. NVL have also noted to LBH the felling and cropping of numerous large trees by TfL alongside the Northwood Station Car Park – an action which in NVL's opinion is hardly consistent with promotion of a healthy Town Centre environment.

It must be stated that the Draft London Plan's proposals for green roofs/walls/roof gardens/extra street trees are not, in NVL's opinion, an appropriate substitute for existing gardens and the removal of existing town centre trees. Gardens, especially those in town centres, bring, in NVL's opinion, many advantages for biodiversity, flood risk control, improved air quality etc., which the Draft London Plan's proposals may well not bring.

User:	Chairs of Camden's Conservation Area Advisory Committees

We broadly welcome policy on Green Belt.

User: CIBSE

We support the broad objectives to protect green spaces, promote green infrastructure, and increase urban greening; this can and should play a fundamental part in the Mayor's environmental, health and wellbeing objectives, as highlighted by the World Health Organization's recent review on the impact of urban green spaces14.

We are concerned by the lack of clear objectives for improvements, and the lack of associated monitoring as part of the Plan's essential KPIs. Our specific comments and recommendations are detailed below.

We are also concerned that this chapter does not address maintenance, other than a brief mention under policy G9. We would stress the importance of budgets and resources for long-term management of green infrastructure and open space. These should be identified and secured (for example, we understand some local authorities and land owners plan for 50-year budgets). In the case of new developments, this could for example be secured in S106 agreements.

User:	Historic England

London’s historic landscapes range from its expansive Royal Parks and the registered landscapes associated with grand estates, to an unparalleled network of garden squares and locally designed parks, many with historic features and structures, and the ‘Magnificent Seven’ Victorian cemeteries. London’s parks also provide ‘reserve’ areas in which archaeological remains are well preserved.

The significance of London’s parks should be protected in a consistent manner in the London Plan policies. We welcome the references in HC1 part A and Figure 7.3. However, the significance of these green spaces is not yet consistently reflected between chapters 7 and 8. Within Chapter 8, we welcome the reference in policy G3 to historic features and landscapes, but this is equally applicable to policy G1.

The contribution of the historic environment has long been recognised as contributing to the multi-functional offer of green infrastructure. In many cases heritage is a strong factor in drawing people to these open spaces and, in doing so, promotes the health and well-being of Londoners.

User: London Friends of Greenspaces Network

A. SOME CONTEXT

1. The Friends Groups movement The LFGN is the voice of the dynamic and inspirational grassroots movement of over 600 local Friends of Parks groups - the volunteers who act on behalf of the communities who use and care about our vital public green spaces throughout London. The Network exists to support and represent Friends Groups' activities, issues and concerns, and to amplify their passionate and knowledgeable voices. We promote the formation and development of strong Friends of Parks Forums for every borough working in partnership with Local Authorities and parks management. The LFGN is the London Region of the National Federation of Parks and Green Spaces, representing the Friends Groups' movement throughout the UK. The LFGN Chair also currently chairs the NFPGS, and sits on the Government / Greenspace Sector liaison body, the Parks Action Group.

2. What do our public green spaces require, and what do the public expect? Every green space should have the management and maintenance it deserves to enable the local community to enjoy its many benefits. With an increasing population and rising obesity levels amongst London's children, public parks are needed more than ever and should be expanding rather than shrinking, and improving rather than deteriorating.

3. The current situation Our much-loved parks and green spaces - around 3,000 throughout London - are recognised by all to be massively popular and essential public resources providing an unparalleled range of vital services and facilities for all sections of our communities, and for nature. But their future is under threat due to Government cuts to local public services. This serious underfunding crisis shames us all throughout the capital and needs to be addressed and reversed immediately by all tiers of government. There is also a related and increasing threat of inappropriate development in and around public green space, and the spread of commercialisation undermining the integrity of such spaces as public resources for all to enjoy freely. The coming declaration of London as the world's first National Park City is an unparalleled opportunity and must act as a driver to ensure that real action to improve policies and funding is taken now.

4. Policies Policies and programmes abound aiming to recognise, protect and enhance London's open green spaces: the London Plan's all-London Green Grid; London's Green Infrastructure Report; Spatial Planning Guidance - Preparing Tree and Woodland Strategies; Fields In Trust covenants; the Green Flag Awards, London in Bloom awards; Metropolitan Open Land and other designations, and the commitment towards London being declared a National Park City. Such policies are welcome, but on their own clearly inadequate in response to the growing green space crisis. Major threats and accompanying public uproar regarding open green spaces are increasing throughout London –

Chapter 9 Sustainable Infrastructure

User:	London Food LInk /Sustain

The topics covered in this chapter are not as directly relevant to food and farming, yet we know that a sustainable food and farming system does require infrastructure.

We would welcome:

- An acknowledgement of the significant GHG emissions related to food delivery and food waste and a strategy to tackle the pollution associated with the large volume of food and food waste that is transported across London every day.
- A pioneering approach to promoting sustainable diets and creating the infrastructure needed to ensure this happens through provision of land for growing food, premises for local food enterprises, and for efficient distribution within the capital, given the significant level of emissions associated with what Londoners eat.
- A commitment to create infrastructure for low GHG emissions food delivery in the development of new large communities.
- Leadership from London on how cities protect vital natural resources for food production, including soil, pollinators and water in and around the capital, including a commitment to protect all high quality Grade 1 farm land for food growing and consider hinterland for new market gardens instead of housing or other developments, to increase urban and peri-urban food production and distribution.

User: London Assembly Green Party Group

These policies are an improvement in many ways on the current London Plan, particularly as the air pollution plans here seek to be more effective than those of the previous Mayor. However, even these policies do not have enough ambition, and our amendments to this chapter will make sure we stick to our legal obligations to give everyone clean air to breathe in the shortest possible time.

These policies and targets also fail to convey the deep carbon cuts that are required to stabilise London’s carbon emissions to tackle climate change. This complacency is further manifested by the omission of a single reference to the Paris Climate Change agreement in the entire draft London Plan.

User:	Canary Wharf Group

As a general point, the plan’s policy targets for air quality, urban greening and zerocarbon development are technically difficult to achieve and place considerablerequirements on development such that they unduly constrain viability and developmentdelivery. These policies should include better definition and clarity on the overallenvironmental priority with regards to costs and environmental performance.

User: Environment Agency

We largely support the policy ambitions in this Chapter, and its focus on sustainable infrastructure delivery. We make recommendations for strengthening some policies. Given the scale of planned growth, we have some concerns and queries around policy deliverability and the evidence base, notably regarding circular economy and waste management, water infrastructure, and flood management.

We welcome:

- The policy imperative to improve London's poor air quality;
- The Mayor's zero carbon target by 2050;
- The imperative for improving water infrastructure and efficiency of water use.
- The advocacy of circular economy principles, increased recycling, and London's waste self-sufficiency.
- Policy support for flood risk management, notably the Mayor's support for the Thames Estuary 2100 Plan, and options around a new Thames Barrier.
- The imperative for development to deliver sustainable drainage, achieving Greenfield run-off rates, and supporting boroughs' Surface Water Management Plans.
- Support for Riverside Strategies, and Joint Thames Strategies;Support for the objectives of the Thames River Basin Management Plan, and associated Catchment Plans
- Support for energy strategies, and for green infrastructure in mitigating energy needs and reducing urban heat effects;
- Recognition of the strategic role of the capital's waterways, and measures for their protection. We particularly welcome policy advocacy of river restoration and naturalisation.

User: Environment Agency

It is our firm view that land quality and remediation of contamination is a missing policy area within the draft Plan. The current London Plan addresses land contamination (Policy 5.21). The draft London Plan is an opportunity to improve upon that policy, and clarify expectations for a strategic approach to tackling contamination, particularly given the proposed ‘clustering’ of Opportunity Areas for growth.

Many of the Mayor’s Opportunity Areas (and major growth locations), rely heavily on the development of brownfield land, some of which is contaminated, impacting on water bodies, groundwater, and potentially surface water.

The draft Plan’s Integrated Impact Assessment (IIA) addresses Geology and Soils. At IIA, Section 5.20, p.24 Geology and Soils, there is recognition that some areas in London have high levels of contamination, and that this is particularly an issue for some of London’s larger brownfield sites which require development.

At IIA, page 28, a key issue is ‘Remediation of contaminated land’. We agree. At IIA, page 33, we note that relevant assessment questions include: restoration of degraded soil? and ‘ minimise the risk of health impacts through contamination’.

There was discussion in the IIA Scoping Report around the opportunities to focus on prevention and remediation of soil and contamination, and to adopt a co-ordinated approach to bring derelict land, with high abnormal costs, back into use (IIA Scoping Report, Section 5.22, p.137 on). However this discussion does not appear to have been followed through in the IIA itself.

The benefits of dealing with contamination strategically are evident in the London Legacy site’s development. A Global Remediation Strategy (GRS) was developed and implemented for the regeneration of the 250ha Olympic Park. The GRS established the framework by which Site Specific Remediation Strategies (SSRS) were determined for each Olympic Park construction zone. Implementing this framework enabled sustainable soil and groundwater remediation techniques to be planned and delivered, and enabled more than 90 % of one million cubic metres of contaminated soil to be cleaned and reused on site.

Brownfield land within major growth locations may have a combination of problems, including contamination that can be addressed more economically and sustainably with a strategic approach. GRS for large multiple development sites can help strategically address land contamination issues at the planning stage and help deliver sustainable results on a strategic scale.

Remediating contamination, and consequently improving soil and groundwater quality would aid the delivery of Plan objectives for improving health, greening London, supporting biodiversity gain, and would contribute to the feasibility of sustainable drainage systems in locations where it otherwise would be unfeasible.

We draw attention to the Old Oak and Park Royal Mayoral Development Corporation's revised Local Plan 2017, Policy EU13 which promotes a strategic approach in supporting development which effectively tackles contamination across the 3 boroughs which comprise the Old Oak and Park Royal Opportunity Areas.

Consequently, we consider that the draft Plan must take the lead in promoting a strategic approach to tackling soil contamination and remediation, and contributing to the prevention of contamination to water bodies, groundwater and surface water, based on current best practise and guidance. We would expect revisions to the IIA to address the key issues and questions it correctly raises.

Recommendation:

We strongly recommend that the new Plan includes a policy and text on land contamination and remediation. The Plan should identify and promote a strategic approach for London, and for development plans and proposals to follow in tackling contamination, particularly given its focus on brownfield locations for accommodating major new growth.

This would contribute to bringing brownfield land back into beneficial use, and ensure that the development of brownfield land results in the reduction of significant harm to human health and the environment.

We are happy to advise further on policy wording and approach as required.

User: N\A

Chapter 9 Sustainable Infrastructure

I am very pleased to see the commitment and the proposals to clean up London’s air and encourage sustainable development.

I support the PLA and Transport for London’s Pier Strategy, which promotes extending river services to East London and its growth areas to encourage modal shift to the river. I would advocate for a pier to be introduced in Thamesmead and in Erith to provide the river transport

User:	Central Bedfordshire

Minerals and Waste

• We welcome and strongly support the overall strategy for minerals and waste, in particular:
• The provision for safeguarding aggregate wharves and railheads (PoliciesT7, SI10 and SI15);
• The emphasis on recycled aggregates, whilst at the same time seeking to maintain aggregate landbanks (Policy SI10);
• The safeguarding of aggregate resources (Policy SI10)
• The reduction and minimisation of waste, aiming at a circular economy (Policy S17);
• Waste self-sufficiency by 2026 (Policy SI8);
• The safeguarding of waste management sites (Policy SI9);
• The ‘Agent of Change’ principle (Policy D12) which will assist in safeguarding existing mineral and waste sites.

User:	Landscape Institute London

This chapter covers Air Quality, but doesn’t seem to be much about Climate Change. This was covered in more detail in the Mayor’s Environment Strategy.

User: Northwoods Voice Limited

Chapter 9. Sustainable Infrastructure.

The proposal for Green Walls is likely to add, in NVL's opinion, significantly to water use to keep these structures flourishing. They should be omitted from the plan as they are unlikely, in NVL's opinion, to achieve the desired effect of adequately improving air quality, instead are likely to be a waste of water and the maintenance of which may well fall onto local tax payers, although this detail is not stated in the Draft London Plan

User: L&Q

Zero carbon £/tonne

Footnote 120 states that ‘Boroughs should develop a price for offsetting carbon using either a nationally recognised carbon pricing mechanism or a price based on the cost of offsetting carbon across the borough. A nationally recognised nontraded price of £95/tonne has been tested as part of the viability assessment for the London Plan which boroughs may use to collect offset payments.’

The London Plan must be clear to Boroughs that they must only refer to an evidenced price £/tonne based on the cost of offsetting carbon across the borough. They must not refer to a generic carbon pricing mechanism. The evidence must refer to costed carbon projects to be delivered in the Borough and for the specific benefit of the Borough (including its residents and businesses). The development industry’s view is that a sum as high as £95/tonne will rarely if ever turn out to be justifiable once such an assessment is undertaken. The London Plan should also be explicit throughout that any contributions / obligations sought would detrimentally affects a scheme’s ability to address other planning objectives, including the delivery of affordable housing.

User: Gail Waldman

5 SUSTAINABILITY

5A - reclaim and uphold genuine meaning with criteria based on community strengths and cohesion

5A.1 London is a magnet for talent from across the UK, depriving the regions of essential skills to rebalance our economy and life chances. We therefore cannot overstress that the impact of the planning policies in the new London Plan must oblige London to consider and truly benefit the whole of the UK.

5A.2 It is very difficult to be accurate about demographic projections and need to consider there may be slower organic development in London but more in other areas of the UK.

5A.3 We are concerned about density intensification and creating not only a London megalopolis but a conurbation without sufficient green spaces and lungs.

5A.4 Added protections are needed for the environment in the face of such enormous pressures to expand.

5B - minimise community fracturing and breakdown with growth and change

5B.1 Top down generation of economic "opportunities" often overlooks and displaces local communities. This needs to be reversed.

5B.2 Industrial and employment strategies as well as infrastructure must precede transfer of populations/communities.

User:	East Barnet Resident Association

- London’s infrastructure cannot support so many additional people. Problems with water, electricity and gas, as well as already overstretched facilities like schools, GPs, hospitals, parking, recreation, traffic congestion.

User: Association of Directors of Public Health

ADPH London strongly agrees with policies in the section – they are strong and positive.

Exposure to harmful levels of air pollution contributes to a considerably poorer quality of life, increased use of primary and secondary health services, and excess premature deaths in our city, with long-term exposure responsible for thousands of early deaths each year. Poor air quality disproportionally impacts those living in the most deprived areas. Poor air quality also discourages people from walking and cycling around the city at a time when rates of physical inactivity, sedentary behaviour and obesity are at very high levels. To address these health-related issues, strong leadership and a strategic approach which acts on all the different levers available are required. In this, we strongly support the Mayor in his efforts to improve London's air quality.

To ensure that the policies are implemented and that meaningful impacts on health outcomes and inequalities are achieved, we strongly recommend that the Mayor:

1. Provides ongoing support to boroughs and local communities to implement the strategy and identify the interventions that will have the greatest impact at local level.
2. Establishes clear channels of accountability and governance for achieving the strategy's goals, indicators and time-scales for implementation.
3. Ensures equity and fairness remain at the centre of all strategy initiatives.
4. Implements a thorough evaluation and development process to demonstrate impact and identify areas for improvement.

User:	Primrose Hill Conservation Area Advisory Committee

General request 1: We would welcome a presumption against planning consent for the installation of air-conditioning plant, especially in traditional buildings. Our concern is both to do all we can to minimise the use of energy, but also to address the impact on adjacent buildings, residents and workers.

General request 2: Given the need for more housing, and the development of Town Centres, we are concerned to ensure that the ventilation of retail food outlets does not harm the amenity of residential space.

User:	Juliet Hobday

I believe that everyone in London has the right to breathe clean air, have access to nature and to benefit from clean energy. I am therefore pleased to see policies in the new London Plan which seek to address these important environmental issues.

User: Nick Horgan

As an asthma sufferer I would like to be able to go out in London without worrying about the effect of the air on my health.

I believe that everyone in London has the right to breathe clean air, have access to nature and to benefit from clean energy. I am therefore pleased to see policies in the new London Plan which seek to address these important environmental issues.

Chapter 10 Transport

User:	Miss Julie Smith

We desperately need a direct train service into London from Bromley North train station which serves London Bridge/Charing Cross and Cannon St The shuttle service to Grove Park to pick up London bound trains is unacceptable for commuters. Having to use a shuttle to Grove Park adds extra travel time to our journey on already short and generally late packed trains. Why cant some trains start from Bromley North? The shuttle also does not operate on Sundays bringing in more cars to Bromley centre with shoppers who could have come in on the train. With all the improvements made to London Bridge station why are commuters from Bromley North still suffering an appalling outdated Victorian style service? We are the only London borough station that has such an outmoded unsatisfactory shuttle service.

User: Mrs Alison Willows

This policy, together with many coming out of London (which exists in its own bubble and undergoes these pseudo consultations with no intention of doing anything other than what they set out to do) is directly descriminating against certain groups; those with long term health conditions (but do not have blue badges), carers, parents of children with long term health conditions and parents full stop. For these groups cars are unfortunAtely a necessity; without them they cannot do all they do; it is impossible to squeeeze in doctors and hospital appointments, childcare, work, caring responsibilities all in one day if you use public transport unfortunately. Many of us actively want and do work part time as well as carrying out these functions and we should be supported to do so. The problem is politicians and policy makers are far removed from normal life and have no concept of the struggle for these people. These things are fine in London but not in small towns

User:	Mrs Alison Willows

You need to put carers, people with long term conditions, parents with children with long term conditions at the very heart of your developments. Their needs are grossly disregarded which is utterly appalling in this day and age. A policy that pushes people out of work due to no reasonable parking is disgraceful, as is one which makes carers lives even tougher. London should hang it’s head in shame.

User: Campaign for Better Transport

1. CBT is an established pressure group campaigning for sustainable transport.

2. The broad thrust of these comments was agreed at a meeting of the CBT London group and subsequently refined in e-mail correspondence with participating members,

3. CBT London welcomes the new London Plan, with its emphasis on Good Growth, a healthy inclusive city and its determination to limit unsustainable modes of transport. Where we are critical, it is largely through concern that in places the plan needs to be more robust if its aims and objectives are to be met.

4. We welcome the policy of encouraging densification around major transport interchange points (policy GG2). However, for this to succeed, both the trains and buses, and the platforms at which the former arrive, must have sufficient capacity at peak times to accommodate increased use. This should be the primary focus of new infrastructure, rather than development potential of places further from zone 1, and often beyond the GLA boundary. We wish to see policies GG2 and T3 amended to address this point.

5. Good growth will not be achieved by a "predict and provide" approach to infrastructure. The Plan needs explicitly to state, as its predecessors have done, the aim of reducing the need to travel. By this we do not mean restricting choice, but rather enabling people to live closer to their place of work (which many of the housing and economy policies address; as does paragraph 10.1.1 in its reference to the integration of land and transport), and reducing distances travelled in other ways: new rail infrastructure providing direct links not currently available, improving orbital links to obviate the need to travel into and out of central London. We wish to see policies GG2 E and T3 strengthened in this way.

6. We consider that the omission of Air Quality from policy GG3 is an oversight and wish to see the policy amended by an additional clause H. This should be cross referenced with policy T2.

7. We strongly support policies SD6-SD10 inclusive on Town Centres. Not only are Town Centres good in themselves for raising the quality of life, their continued prosperity is key to delivering the aims of improving air quality and increasing the share of modally sustainable means of transport to 80%. If encouraging people to walk for 20 minutes a day is important, and it is, how much more should we incentivise those who are able to do so to carry their own shopping rather than ordering on line and promulgating an inexorable growth in white van deliveries alongside a decline in Town Centres. The Plan needs to include proposals for such incentives.

8. The car parking standards for outer London (policies T6.1, T6.2 and T6.3) seem unnecessarily generous and difficult to reconcile with the welcome objective of increasing to 80% the proportion of journeys to be made by sustainable modes of transport. In particular, we cannot envisage any circumstances in which the provision of more than one space per residential unit could be justified.

9. Level 5 CAVs (driverless cars) may or may not become commonplace in the lifetime of this plan. To guard against the possibility of such vehicles coming into use and undermining the modal shift to the most sustainable means, the Plan should address and confine the parking of such vehicles.

10. Conversely, the minimum cycle parking standards (Policy T5 and Table 10.2) are insufficient to drive "the ambitious aim to reduce Londoners' dependency on cars".

11. The healthy street should be devoid of unnecessary clutter, which impedes walking as a means of getting from A to B, and is of particular concern to several disability groups. The policy T2 of making the street a pleasant environment to visit needs to temper the enthusiasm for items of interest (Things to see and do) with an acknowledgement of the need to maintain clear lines of travel.

12. CBT London welcomes the Mayor's stance on Heathrow (policy T8D). We are opposed to any expansion of airport capacity in the south-east and believe that all journeys over land should be made by rail rather than air.

Andrew Bosi, Vice-Chair

User: Mr Dave Colling

Reducing car use in central london is the correct approach however a one size fits all approach fails to deliver benefits to residents as you move farther out from the centre Lower PTAL ratings in outer London greater distances (and more time required) to travel over none linear routes mean that the car is essential for moving around especially for families with children A flexible transport policy recognising that people use cars because in many cases they have to in order to go about their daily lives at the pace demanded by living in London is desperately needed.

The Mayors transport polict also needs to recognise that London is not entirely flat.

Transport Policies especially relating to cycling, walking and PTAL calculations need to take into account topography and terrain and acknowledge that for many residents cycling up a sustained 10% gradient is not an option and never will be.

User:	Levitt Bernstein

Growth corridors and Strategic Infrastructure Priorities are the priorities in the draft London Plan's spatial strategy, with the 'Healthy Streets Approach' the cornerstone of the Mayor's transport policies for development plans and proposals, supported heavily by TFL.

The intention is to improve health and reduce health inequalities, while increasing levels of walking, cycling and public transport use towards the 80% target of all trips by 2041. The Healthy Streets Approach will be instrumental in improving environmental quality and reaching the 2050 zero carbon target that the Mayor has set. Linked to this is the intent to promote car free development in areas with high PTAL levels.

User: London Legacy Development Corporation

Transport

The strategic approach to transport and the emphasis on healthy streets set out in the draft Plan aligns with LLDC's approach, which includes the establishment of connected walking and cycling routes within Queen Elizabeth Olympic Park; the extension of the Santander Bike scheme to the area; the ambition for car free or reduced car use on all developments; and the priority given to taking forwards the connected and autonomous vehicle agenda. It could be helpful to reference the work TFL and other functional bodies are doing in relation to the deployment of unmanned aerial vehicles, an area in which there is likely to be considerable development in the period to which the draft Plan pertains. It should be noted that the fact that venues within the Park regularly host large scale events presents some challenges in terms of transporting high volumes of people in a way which aligns with the wider sustainability agenda.

LLDC welcomes the enhanced focus on freight and servicing in the draft Plan, and the encouragement given to innovation in this area. Due to the large developments taking place and facilities such as Westfield Stratford City, this is a hugely important issue for us, and we have been considering the potential of Smart Cities technology to provide last-mile schemes in the area around Queen Elizabeth Olympic Park.

Given the scale of planned development and the current pace of growth, addressing pressures at Stratford Station through improvement and upgrade works remains a significant priority. This could helpfully be emphasised by adding a reference to Table 10.1 (cost would be high; timescales 2018-2026).

User: Thurrock Borough Council

Transport

London's ambition to create a transport network that is sustainable and able to provide for its growing population is welcomed. However if London is to achieve the vision set out in the Mayor's Transport Strategy and the draft London Plan, it is suggested that the Mayor of London would benefit from supporting partners outside of London in key strategic projects and ensuring that there is meaningful engagement on transport beyond its borders.

The Mayor's sustainable transport ambitions (in relation to extending TfL's franchise, car travel and air pollution in particular) also need to be considered in a wider context and conversations with those councils most likely to be impacted on London's borders, including Thurrock, need to be given greater priority.

There is a need for cross-border relationships between TfL and transport bodies and Councils in the East of England such as Thurrock, to be strengthened so that different modes of transport can be linked up and planned more effectively in advance to enable the effective delivery of the growth ambitions of London and its neighbouring authorities.

In order to achieve the Mayor's ambitions in relation to upgrading of rail freight routes especially to the growing ports on the Thames, Felixstowe and Harwich, and improvements to surface links to airports, the Mayor of London is asked to collaborate with councils in the East including Thurrock and also wider partners to make the case for expanding road and rail capacity both within and outside of London.

User:	The Access Association

It would be good to see of more joined up provision so Shop mobility and parking together. Again there is no mention on the policy on shared surfaces or spaces. Should accessible parking apply to housing conversions?

User: London Assembly Green Party Group

The draft London Plan takes up some principles of sustainable travel but only in a piecemeal way and they lack a real vision for how London needs to be getting around in 2040.

These policies do include strong Healthy Streets principles, and these are placed throughout the plan in a cross-cutting way, though there are some gaps, and even these plans will only be achievable if the Mayor can reduce the overall amount of traffic in London.

The final plan therefore needs to include a target to reduce traffic overall, not just targets for a shift in mode share. In doing so, the Mayor also needs to go further than the unambitious London-wide traffic reduction target in his draft Transport Strategy. These would only reduce total anticipated levels of traffic by 10-15 per cent by 2041.

I cannot see anything in this plan that aims to reduce road space for motor traffic as part of development – a prerequisite, also enabled by reducing traffic, for creating space for walking, cycling and Healthy Streets. In particular the parking policies in this draft Plan are not acceptable. They permit excessive residential parking in outer boroughs without the evidence to demonstrate need. This could seriously undermine the Mayor's goals.

Updated draft Mayor's Transport Strategy. Mayor of London, Mar 2018
https://www.london.gov.uk/moderngov/documents/b16916/Draft%20Transport%20Strategy%20Thursday%2008-Mar-2018%2010.00%20London%20Assembly%20Plenary.pdf?T=9

User:	London Borough of Hammersmith and Fulham

Given the Mayor’s policy to support and promote major transport infrastructure proposals across London we consider it is important that there should be reference to the proposal to replace Hammersmith flyover with a flyunder which will facilitate major regeneration, new housing and environmental benefits to the wider area.

User: The Royal Parks

T1 Strategic approach to transport

TRP supports the aspiration of reducing London's dependency on motor cars and aim for 80% of journeys to be made by walking, cycling and public transport. This reflects our aim of reducing the number of motor vehicles entering the Royal Parks. The policy needs to acknowledge that a different approach may need to be taken in different areas. For example, parks are principally places of public recreation, where the pedestrian has priority and this should be reflected in transport planning and operational delivery.

T5 Cycling

TRP supports the enhancement of cycling provision but removing barriers to cyclists should not result in the introduction of new ones for pedestrians. In the Royal Parks, pedestrians will continue to have priority but we will seek to introduce provision that encourages peaceful co-existence between all visitors.

TRP recognises the need for cycling parking but new provision should be in keeping with environment in which they sit, for example, the historic listed landscapes of The Royal Parks may not be appropriate locations.

User: Putney Society

We support the aspirations in the draft Plan to encourage a much greater proportion of trips to be made by foot, cycle and public transport and seek to reduce London's dependency on cars.

We welcome proposals that:

? provide greater step –free access on the Underground and other railways across London and would recommend that the stations at East Putney and Putney Bridge be considered;

? funded proposals be used to improve transport capacity and connectivity. For example, in Putney there maybe scope for private investment to help fund a second entrance to Putney railway station thereby providing a better pedestrian link with the nearby East Putney underground station. However we believe that developments that give rise to such investment should be considered in the round. They should not be at the expense of good design or the failure to provide adequate affordable housing;

? improve freight consolidation. However we note that Wandsworth and other boroughs have examined this unsuccessfully before. We would wish to see more detail about how it might be made to work in practice. The draft Plan has an emphasis on new developments but it also needs to address the rapid growth in number of delivery vehicles for home deliveries. One solution might be more centralised collection points for example at railway stations such as Putney where there ample storage space;

? ensure all operational parking should provide infrastructure for electric or other Ultra-Low Emission vehicles

? encourage more cycling however the cycle hire scheme needs evaluating as it is not well used in Putney. A review might consider how uptake might be improved or whether some existing hire space, for example near the railway station, be released for bike parking. We also recommend that Network Rail work with the rail companies to ensure that unused platforms or ‘dead space’ is used for cycle parking e.g. at Putney station.
We would also wish to raise the following points:

? Bring forward from 2021 the proposed extension of the Night Tube to passengers using the District line;

? Falling rail and underground usage – we would support an evaluation of the reasons for this decline. Is this trend likely to continue as more work from home or are there other factors?

? Efficiency and resilience can also be promoted by maximising connectivity between different parts. The history of their development leaves too many places where transport routes, notably railways, cross without connecting. The prime local example is the District Line at East Putney / crossing but not linked to the SW Railways line from Waterloo. The same SW Railways line then between Chiswick & Kew Bridge passes under the District and Overground Richmond branch with no connection. We could cite many more examples, including the Overground at Brixton.

? We encourage greater use of river passenger transport. We would welcome an extension to the hours the Clipper Service operates so it covers both off peak in week days but also serves at weekends. It is a greatly under utilised resource which could relieve pressures on the bus, tube and rail networks;

? The GLA and Boroughs should consider simple ways of easing congestion to improve traffic flows. For example, a day time delivery loading ban in Putney High Street has reduced traffic holdups while a longer term problem of an inappropriately located bus garage remains.
Putney Society comments on draft New London Plan, February 2018
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? In Putney – and almost certainly in many other parts of London – there is a growing problem with proliferation of delivery companies such as Deliveroo, whose delivery bikes and scooters congest the pavements and areas outside the restaurants they serve. This and the resting drivers from Uber and other big taxi services represent a large population with nowhere to park, and often no access to toilets etc.

User: Telegraph Hill Society

Section T generally

Further consideration as regards developments, cycle routes and sustainable streets needs to be given to the consequential impact on surrounding areas.

In addition to the issue of parking referred to in our objection to T6 above, in our experience changes to the transport infrastructure including the requirements of new developments often have an impact on the usage of roads across a wide area. Traffic can be diverted, either intentionally or by accident, from main roads onto residential roads with a significant loss of amenity to those areas.

User: Home Builders Federation

Policy T1: Strategic approach to transport

Part of the policy is unsound because it is unjustified and not positively prepared.

Part B requires that all development should "ensure that any impacts on London's transport etc…are mitigated". Ensuring that any impact on transport is mitigated is too open-ended as a policy requirement. Transport is a very wide category and it would be nearly impossible for an applicant to assess to the satisfaction of the decision-maker that s/he had taken into account all likely impacts on transport or to an extent that would satisfy the decision-taker. This would fail the NPPF in terms of the requirements of planning policies and Local Plans as described in paragraphs 15, 17 and 154. We recommend that the policy is re-drafted to read:

"…and endeavour to ensure that impacts on London's transport, walking and cycling routes…".

Policy T4: Assessing and mitigating transport impacts

Part C and E of the policy are unsound because they propose things that are contrary to the CIL Regulations and national policy.

Part C states that mitigation could be achieved in part through financial contributions. We recommend that the policy is re-worded in order not to confuse the distinct roles of S106 obligations and the Community Infrastructure Levy (CIL). If money is paid through a CIL towards transport items in a Regulation 123 list, then the applicant cannot lawfully make separate financial contributions to these items. Part C should distinguish between the S106 and CIL. It would be sensible to pay for the cumulative impacts on public transport through a CIL. The draft London Plan should encourage this.

Similarly Part E is misguided in requiring applicants to address wider public transport and public health impacts. These are objectives that are legitimate to pursue through a CIL but not through S106 obligations.

Parts C and E should be deleted.

Policy T6: Car parking

The policy is unsound because it conflicts with national policy.

The Government removed minimum or maximum car-parking standards from national planning policy mainly because where maximum standards were applied it was resulting in cars being parked on pathways and verges. This is a risk with the draft London Plan.

The Government introduced the following change to the NPPF through the WMS of 25 March 2015:

“Parking standards are covered in paragraph 39 of the National Planning Policy Framework. The following text now needs to be read alongside that paragraph: “Local planning authorities should only impose local parking standards for residential and non-residential development where there is clear and compelling justification that it is necessary to manage their local road network.”

National policy is clear that the establishment of car parking standards is a local matter. We consider that the setting of car parking standards is a matter for the local planning authority. Part C of the policy should be re-drafted to read:

“C The local planning authority should have regard to the maximum car parking standards set out in Policy T6.1…”

Policy T6.1: Residential parking

The policy is unsound because it conflicts with national policy.

Reflecting our argument above, Part A is unsound because it is too prescriptive. It should be re-drafted to read:

“A When preparing Local Plans, local planning authorities should have regard to the maximum parking standards set out in Table 10.3…”.

Part C is unsound because it is unjustified and because it conflicts with national policy set out in the Written Ministerial Statement of the 25 March 2015.

The policy requires that 20% of car parking spaces should have charging facilities with passive provision for all remaining places.

We think it is premature for the Mayor to develop policy in this area. National policy discourages local authorities from prescribing policies on development standards that go further than the building regulations.

The Government's shift in policy towards a greater reliance on electric vehicles has the potential to introduce quite serious unintended consequences for housing delivery if not given careful consideration.

As in other areas of environmental policy (such as water and energy efficiency) the Mayor is already anticipating the development of a national policy by seeking to introduce planning policies that impose the wider provision of electric car charging. Many believe that a simple 'end of use' 13amp plug socket is sufficient for this purpose but this is far from being appropriate. Although the provision of in-house charging infrastructure is relatively simple and inexpensive - the real challenges lie away from the house/site.

In terms of grid capacity, the adverse impact that any increase in electric charging could have if more than say 10% of dwellings are to have a re-charge facility is potentially considerable. This warrants careful consideration by the Mayor and by Government. However, this is not necessarily the crux of the matter. Any need to increase the electric loading in an area can be constrained by the size and capacity of cables that are already laid in the ground. If re-charge demand suddenly becomes excessive, then investment in new, increased capacity cable and sub-station infrastructure may well be essential. Needless to say the extent, timing and who will be required to pay for the cost of network reinforcement (most probably the house builders themselves) could be critical considerations for all partner/stakeholder interests. As commented above, such policy initiatives will reduce against the amount of money in a development that is available to subsidise the supply of affordable homes.

We think it is premature for the Mayor to stipulate policy in this area. If electric vehicles are to be encouraged by the Government, and new house building is to be the testing ground, then as in other areas, the implications needs to be carefully investigated by Government and a national approach is needed that is implemented through the Building Regulations. The Mayor and local authorities should not be allowed to develop their own variations and impose this through local planning policy.

However, if Government policy in this direction is to encourage combined authorities or local authorities to pursue the development of local policies for vehicle charging then they should first engage with the main energy suppliers in order to determine network capacity and availability and for this to be done before any related policy is allowed to be crystallised. If there are constraints, then the combined authorities or local authority should again look at timing and investment requirements (from a local plan viability perspective), before crystallising its local plan.

We consider that it is premature for the Mayor to devise policy in this area. A national approach is needed, which should be defined by Government through the Building Regulations.

User: The Pinner Association

Comments on Chapter 10 – Transport:

1. Agree with concept of healthy street although pollution is less of a problem in leafy suburbs
2. Agree with aim of increasing walking, cycling and use of public transport. However, this is hard to achieve in outer London where distances are greater and public transport less well provided. It is totally unrealistic to expect the targets of reducing car use will be met in outer London.
3. In the light of 2, provision must be made for reducing congestion at key junctions. This reduces pollution from stationary or slow moving vehicles and reduces journey time especially for buses
4. Agree with more street trees. It's what makes the suburbs attractive and is good for the environment[RS1]
5. Agree with Vison Zero for Road Safety. Sufficient resources must be available, eg traffic police for monitoring and road safety engineers and trainers[RS2]
6. Accessibility at stations must be improved. Harrow on the Hill scheme must be completed.
7. All Harrow's bus stops are already disabled compliant. This must be monitored for new stops or in case of any changes
8. More frequent trains to Watford are required. Completion of Metropolitan line extension (not mentioned in Transport section and funding now withdrawn by Mayor of London) and at least 4 trains per hour on Overground
9. Aim for night service on Metropolitan line and Piccadilly line to Ruislip
10. Agree with transport assessments for new developments
11. **Objection:** Cycling targets totally unrealistic. Danger of wasted space for unused cycle storage[RS3]
12. **Objection:** Car parking must be minimum not maximum standards. It is unrealistic to assume that restricting[RS4] parking will restrict car use. Inadequate provision just leads to parking on the roads, which is dangerous, reduces access e.g. for emergency and refuse vehicles and is unsightly. On-street parking restrictions should be removed where they are unnecessary and it is safe or expedient to do so
13. Agree flexibility in parking standards is necessary subject to above
14. **Objection:** Motorcycling has minimal impact on car use and car parking spaces should not be sacrificed to allow for them
15. **Objection:** Car clubs are not practical in low density suburbs[RS5]
16. Agree adequate freight access should be provided for retail developments

User: Motorcycle Industry Association

SUMMARY

All transport and infrastructure strategies for London should consider PTW users as a distinct client group. The UK's one and a half million regular PTW users are frequently neglected or forgotten when formulating urban planning and transport policy, despite their status as a group affected by these policy areas. PTWs, particularly the growing electric PTW (ePTW) market, can play a significant role in assisting the Greater London Authority to achieve its stated targets for lower-emission vehicles and its ambitions for London in terms of congestion, decarbonization and road safety.

In order to achieve this goal, we seek the following actions:

• PTWs to be recognised along with walking, cycling and public transport as a low-pollution and congestion-busting alternative to car and van use. While an increase in the number of electric cars in London will do nothing to reduce congestion or wear and tear on London's roads and infrastructure, encouraging the use of ePTWs offers an efficient solution to both congestion and air pollution.

• The market for commuter PTWs in London, which has been growing steadily for the last five years, to be supported through acceptance of PTWs into general transport policy, including a further expansion of access to bus lanes at borough level.

• Recognition that a 25% modal shift among commuters from car to PTW use would significantly lower or even eliminate congestion (see point 18 below). This shift would require provision for secure motorcycle and scooter parking in central London to be expanded by 205,000 spaces.

• Since motorcycles contribute extremely little to the amount of air pollution produced by transport, and since newer models will come with lower limits on pollutant emissions, any ULEZ or ZEZ which levies an entry charge on PTWs should offer incentives for newer vehicles, in order to encourage a switch towards these newer low-emission models. These incentives could take the form of a scrappage scheme for older/ICE PTWs, or increased subsidies for those wishing to upgrade their vehicles. These schemes could be funded through a proportionate share of the £13m made available in 2015-2020 through London's Go Ultra Low City Scheme bid to encourage the uptake of ULEVs in London.

• An on-street scooter-sharing scheme for London to be implemented, based on those successfully developed in other major European cities including Paris and Brussels.

• The recently-launched delivery scheme in the City of London to help businesses tackle air pollution by shifting deliveries from diesel vans to cargo bicycles to consider including ePTWs, which have the same eco-friendly advantages while offering greater speed and carrying capacity.

• TfL's Urban Motorcycle Design Handbook to be used in the development of road safety policy.

• The roll-out of charging points for electric vehicles to include provision for ePTWs at all residential and commercial developments.

INTRODUCTION

1. In general, the MCIA would urge that all transport and infrastructure strategies for London be required to make provision for, or at least consider, PTW users as a distinct client group. The UK's one and a half million regular PTW users are frequently neglected or forgotten when formulating urban planning and transport policy, despite their status as a group affected by these policy areas. The neglect of PTWs also overlooks the potential role PTWs can play in contributing to the Mayor's plans, targets and ambitions for London in terms of congestion, decarbonization and road safety, as outlined in Policy T1 and T2 as well as elsewhere in the Draft New London Plan.

2. The current Draft New London Plan refers to PTWs only in the context of motorcycle parking (p.422), and otherwise omits them entirely. The emphasis placed in the Draft New London Plan, and in the Mayor's Transport Strategy, on rebalancing London's transport system from car use towards walking, cycling and public transport, is admirable but, again, erases or overlooks PTW use.

3. Conversely, the MCIA is keen for PTWs to be recognised as vehicles that can be grouped along with cycling and public transport as a low-pollution and congestion-busting alternative to car and van use – particularly in view of the developing market for electric PTWs.

4. This submission therefore outlines opportunities to constructively integrate PTWs into London's transport and infrastructure policy, and the social, environmental and economic benefits this would generate.

GROWTH AND POTENTIAL OF THE LOW-EMISSION EPTW MARKET

5. The UK market for electrically powered two-wheeled vehicles (ePTWs) has great potential. Although new registrations of road-going machines have been limited by low product availability, major PTW manufacturers are now in the process of announcing new products for market release, which should increase uptake. Research and development on ePTWs is also gaining momentum and is viewed as a key part of the industry's future.

6. An increase in the proportion of ePTWs within the national fleet would reduce overall emissions in terms of CO2 and other pollutants. In turn, this would help London meet its targets in reducing CO2 emissions and significantly improving air quality.

7. The UK market for commuter PTWs has been growing steadily for the last five yearsii. ePTWs will form a significant part of this market provided effective support is offered to encourage it to grow, including through making the UK market more attractive to manufacturers. By contrast with the UK electric car market, the ePTW market will need support in order to gain sustained market traction. This in turn will encourage manufacturers to place more quality product at a volume, and therefore price point, comparable to ICE product.

8. This support should include acceptance of the PTW into general transport policy, including a further expansion of access to bus lanes at borough level. Additionally, additional funding could be aimed at ePTW research and development in London to encourage new and innovative two-wheeled product.

9. ePTWs have the advantage of being able to charge via any 3-pin domestic outlet. Increasingly, PTWs are supplied with 'cartridge' style batteries that can be swapped at home or work, which is ideal for those without off street parking or those who live in flats (whilst also increasing the security of the vehicle). This offers significant benefit as charging infrastructure is not a pre-requisite.

10. However, we note the efforts made and the range of grant schemes available to support the installation of charging infrastructure on-street, off-street and at workplaces, and the Chancellor's announcement in Autumn 2017 of a new £400m electric vehicle Charging Infrastructure Investment Fund. We would argue that the roll-out of charging points for electric vehicles should include provision for ePTWs at all residential and commercial developments.

11. We note that the city of Paris, in addition to a subsidy scheme for the purchase of electric motorcycles, is building terminals to recharge these vehicles for free. Many European cities, such as Brusselsiii and including Parisiv, have an on-street scooter sharing scheme available for public use.

CHANGING FREIGHT AND DELIVERY LOGISTICS

12. As noted in the Draft New London Plan (p.88, p.100, p.258), the ongoing development and restructuring of London's professional and retail spaces has necessitated changes in the logistics of freight and deliveries, in order to develop more creative solutions for efficient and non-disruptive transport of goods to workplaces, homes and pick-up points.

13. The Draft New London Plan's commitment to working with transport partners to promote "efficient and sustainable essential freight functions, including by road, rail, water and, for shorter distances, bicycle" (p.404) is another objective with which PTWs have the potential to assist.

14. London has an established tradition and infrastructure based around deliveries by motorcycle courier, which could be expanded to help manage the growth in short-distance deliveries within London to and between workplaces and homes. The use of zero-emission ePTWs for this purpose would, as outlined below, also have a beneficial effect on air quality.

15. We note the launch in January 2018 of a new delivery scheme in the City of London to help businesses tackle toxic air pollution by shifting deliveries from diesel vans to cargo bicyclesv. We would suggest that ePTWs, which have the same eco-friendly advantages and often greater carrying capacity, could usefully bridge the gap between cargo bikes and vans, playing a complementary role to cargo bikes in this transition.

EPTWS AS A SOLUTION TO URBAN CONGESTION

16. The number of electric cars in London has grown significantly in the last five years, with 10,000 electric cars registered in London – ten times as many as in 2012. A clear benefit of electric cars is the production of no emissions at the point of use, which will assist with improving urban air-quality. However, electric cars will do nothing to reduce congestion or wear and tear on UK roads and infrastructure. In fact, offering incentives for electric vehicle use in urban centres – such as the Central London Charging Zone – may result in congestion returning to its previous pre-charge levels.

17. Encouraging the use of ePTWs, on the other hand, offers an efficient solution to both congestion and air pollution.

18. We note the Draft New London Plan’s identification of a shift from car use to more spaceefficient travel as the only long-term solution to London’s congestion problems (p.402) and would argue that this modal shift should include lower-polluting and zero-emission PTWs alongside other alternatives to car use. • Motorcycles can, in most cases, avoid or extricate themselves from congestion. The ability of motorcycles to gain time against rush-hour traffic jams is attested to in several studiesvi.

• While a gridlocked car – even when carrying four passengers – returns zero miles to the gallon, PTWs are not forced to remain stationary in grid-locked traffic with an idling engine.

• In particular, the practice of “filtering” – which allows motorcycles to move between lanes of slow or stationary traffic – eases congestion for all road users, not just the PTW rider, while also resulting in lower accident rates for motorcyclists than remaining stopped in trafficvii.

• A 2011 study by Transport and Mobility Leuvenviii showed that a modal shift of 10% from private cars to PTWs reduced lost vehicle hours in congestion on a trunk road by 63% for everybody using that route (i.e. not just PTW riders). A modal shift of 25% (one quarter of all cars replaced by PTW) eliminated congestion altogether.

We offer the following considerations in support of this argument:

• If the shift identified by TM Leuven were applied to London, this would require a switch from car to PTW use by around 205,000 commuters.ix

• A second study, published in 2011 by Pierre Koppx, showed that an 36% increase in PTW traffic in Paris between 2000 and 2007 accounted for a net benefit of €168 million besides reducing congestion to the people of Paris.

• In many major cities, particularly in Asia and Latin America, a very high rate of motorcycle use has arisen as a means of beating traffic congestion among other economic and cultural reasons. In these cases, it has been observed that even in intensely motorcycle-dependent environments like Ho Chi Minh City, which has 7.5 million people and nearly five million motorcycles, a high rate of traffic flow is still possible even at peak travel times.xi

19. Measures to increase the use of other alternative modes (cycling, walking, public transport) would require significant changes to current infrastructure, such as the building of new bus or cycle lanes, therefore incurring a high level of cost and disruption to communities and businesses. An increase in the use of motorcycles, by contrast, would involve minimal or no infrastructure changes and incur minimal cost or disruption.

20. It would therefore seem prudent to encourage drivers, and particularly commuters, to switch to motorcycle use and particularly to electric motorcycles using financial and/or other incentives.

PTWS AND AIR QUALITY

21. We note the Mayor's proposals, reiterated in the Draft New London Plan, to expand the UltraLow Emission Zone in which all vehicles that do not meet emission standards will be liable to pay a daily charge, with PTWs included in this charge alongside cars and vans.

22. We would like it to be recognized that, as has been noted in several studiesxii, motorcycles contribute extremely little to the amount of air pollution produced by transport. The draft air quality control plan proposed by DEFRA in May 2017 itself noted this point.xiii

23. The phasing out of older models of motorcycle and production of newer models, which have tighter regulations on emissions control and tougher testing regimes, has the potential to reduce this contribution even further. As outlined above, an increase in the proportion of ePTWs within the national fleet would also reduce overall emissions of CO2 and other pollutants.

24. Since motorcycling is not a critical source of air pollution, and since newer models will come with lower limits on pollutant emissions, any scheme that levies an entry charge on PTWs should at least offer incentives for newer vehicles, in order to encourage a switch towards these newer lowemission models. Such incentives could take the form of a scrappage scheme for older/ICE PTWs, or of offering increased subsidies for those wishing to upgrade their vehicles.

25. The MCIA will be submitting a separate response to Transport for London's consultation on changes to London's Ultra-Low Emission Zone and Low Emission Zone, which will expand on the above points.

ROAD SAFETY

26. The PTW industry has always and continues to prioritise road safety and the MCIA has been working with Transport for London to increase road safety for many years. It is evident that the increasing use of automation by car drivers – specifically, of current advanced driver-assistance systems (ADAS) – can pose a significant, if unintentional, danger to PTW and other vulnerable road users. We therefore welcome the Mayor's Vision Zero strategy to reduce deaths and serious injuries on London's streets.

27. The MCIA would, in particular, promote the further usage of TfL's Urban Motorcycle Design Handbookxiv.

PARKING

28. We note the Draft New London Plan's specific mention of motorcycling on p.422 regarding parking provision: "Motorcycle parking will be evaluated on a case-by-case basis. Where provided, each motorcycle parking space should count towards the maximum for car parking spaces at all land uses."

29. We would further note that there is an urgent need for additional on-street secure motorcycle and scooter parking in central urban areas.

30. Points 18-20 above outline the improvements to congestion which could be generated by a modal shift from car to PTW use among commuters. Any such shift – ideally to a situation where 25% of vehicles used to commute into London are PTWs – would require a proportionate increase in the number of parking spaces available for PTWs. We estimate the number of extra parking spaces required to be around 205,000. Building these extra spaces would incur less cost and disruption than the building of new train or tube infrastructure to cope with increased numbers of commuters.

31. We would further suggest that, where parking provision is made for ePTWs, this should be targeted at transport hubs such as stations and airports (as recommended in the IHE guidelines on motorcycle infrastructure)xv.

CONCLUSION

32. PTWs, and particularly the growing market of ePTWs, can play a significant role in assisting the Mayor's Office and Greater London Authority to achieve its stated targets for lower-emission vehicles, as well as furthering air quality control and other environmental strategies.

33. In addition to this, PTWs offer a unique opportunity to reduce congestion, in contrast to zeroemission cars. It is therefore important that the motorcycle industry forms part of both thinking and developments in this policy area.

The MCIA, in particular its Chief Executive, would be happy to answer further questions on any of the points made above.

i https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/download-draft-londonplan-0 ii http://www.mcia.co.uk/sub/pocket-guides iii https://scootysharing.be/

iv http://www.cityscoot.eu/paris/?lang=en v https://www.businessgreen.com/bg/news/3023910/city-of-london-launches-cargo-bike-deliveries-to-slashair-pollution

vi See Estupian et al, 'Motorcycle ownership and use: The case of Latin America', accessed 07.12.06, http://www.academia.edu/3856834/Motorcycle_ownership_and_use_The_case_of_Latin_America_Nicolas_E stupinan_et_al vii See EU Motorcycle Accident In-depth Study (MAIDS) Final Report (2009), http://www.maidsstudy.eu/pdf/MAIDS2.pdf

viii See

http://www.tmleuven.com/project/motorcyclesandcommuting/20110921_Motorfietsen_eindrapport_Eng.pdf ix See https://londondatastore-upload.s3.amazonaws.com/Zho%3Dttw-flows.pdf x See https://www.pierrekopp.com/downloads/2011%20The%20unpredicted%20rise.pdf

1. xi See Hanlon, 'New research indicates motorcycle commuting reduces traffic congestion and emissions', *New Atlas*, February 13, 2012
2. xii See ICCT, "Managing Motorcycles: Opportunities to Reduce Pollution and Fuel Use from Two- and ThreeWheeled Vehicles" (October 2009), at

http://www.theicct.org/sites/default/files/publications/managing_motorcycles.pdf and Christian Hilber and Charles Palmer,"Urban development and air pollution: Evidence from a global panel of cities" (December

2014) http://www.lse.ac.uk/GranthamInstitute/wp-content/uploads/2014/12/Working-Paper-175-HilberPalmer-2014.pdf

xiii See p.7, https://consult.defra.gov.uk/airquality/air-quality-plan-for-tackling-nitrogendioxide/supporting_documents/Consultation%20Document.pdf xiv http://content.tfl.gov.uk/tfl-urban-motorcycle-design-handbook.pdf xv http://www.motorcycleguidelines.org.uk/

User: Motorcycle Industry Association

1. In general, the MCIA would urge that all transport and infrastructure strategies for London be required to make provision for, or at least consider, PTW users as a distinct client group. The UK's one and a half million regular PTW users are frequently neglected or forgotten when formulating urban planning and transport policy, despite their status as a group affected by these policy areas.

The neglect of PTWs also overlooks the potential role PTWs can play in contributing to the Mayor's plans, targets and ambitions for London in terms of congestion, decarbonization and road safety, as outlined in Policy T1 and T2 as well as elsewhere in the Draft New London Plan.

User: Kew Society

Policy T3 Transport capacity, connectivity and safeguarding

Table 10.1 – indicative list of transport schemes - should make clear that step free access at London Underground, Overground and mainline stations should be improved where none exists but also, such as at Kew Gardens, where the step free option is inadequate. For example at Kew, passengers travelling from central London, many wanting to visit the Royal Botanic Gardens, have either to take a long detour to cross over the railway line or to travel on to Richmond and come back again to Kew to access a truly step free exit/entrance.

Policy T6.3 Retail parking

Paragraph 10.6.15 acknowledges that Retail Developments are “significant trip attractors”, or put another way, they generate increased road traffic. Overall the Mayor’s policies aim to reduce road traffic in London. Ideally we would like to see a policy which bans the developments of any further retails parks with large car parks, thereby avoiding increased traffic to such sites and promoting improved air quality. It is not enough to say that such developments “should be well connected by public transport”. Shoppers must be actively encouraged to use public transport, walk, or cycle, to new retail developments by minimising parking at them. We accept that a total ban on providing parking for the general public at such developments is unlikely so we propose that parking provision should be reduced by 50% over that proposed in Table 10.5. , i.e. it should not exceed one space per 150 m3 gross internal area for Inner London, or one space per 100 m2 GIA for Outer London. We note that research by Sustrans and other bodies, shows that shoppers who do not arrive by car spend more than those who do and that pedestrianisation increases turnover of retail businesses rather than decreasing it. See: (https://www.sustrans.org.uk/sites/default/files/170609_activetraveltoolbox_ec_whatworkswellv6.pdf), and the Department for Transport (https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/509587/value-of-cycling.pdf).

Policy T7 Freight and servicing

Policy T7G should also refer to the need to mitigate noise from deliveries in residential areas, particularly at night. This should refer to existing as well as new developments.

Policy T8 Aviation

Policy T8C. We agree that the aviation industry should fully meet its external and environmental costs with respect to noise, air quality and climate change. We think that added emphasis needs to be given in the Plan to the industry meeting the full costs of any airport expansion and that planning permission should only be given for such expansion if the industry can clearly demonstrate that it is committed to this and has the financial resources for it. As the Mayor knows, the current proposals for expansion by Heathrow Airport Limited do not meet this criterion.

Policy T8D should also include a requirement to demonstrate economic value to the UK as a whole. This has not been demonstrated to date. See http://www.richmondheathrowcampaign.org/.

Paragraph 10.8.4 should not refer to extra *runway* capacity but increased capacity through more efficient use of existing runways. See http://www.richmondheathrowcampaign.org/ for the evidence that demonstrates no new runways are needed.

Paragraph 10.8.5 should be strengthened by adoption of World Health Organisation guidelines on noise as required standards to be achieved. There should be a requirement for no increase in existing noise levels as a minimum requirement and preferably an aim to reduce noise at source since mitigation measures, such as double glazing, only improve noise control when people are indoors. Londoners should have the right to enjoy their outdoor environment year-round.

Paragraph 10.8.6 should require *improvement* of air quality, not just no worsening.

User: Royal Town Planning Insitute

We have made a number of recommendations about transport infrastructure investment and the benefits it can bring, particularly if joined up with housing policies and strategies. The Draft Plan is strong on several of these, including delivering a visionary narrative of the benefits and integrating transport infrastructure schemes with wider policy priorities.

The importance of Outer London

56. The Mayor's Transport Strategy and Draft Plan are often concerned with getting people in and out of Central London. However, it is also important to enable people to work near where they live, for example through mixed developments, and greater amounts of orbital public transport.

57. New housing targets are putting a lot of pressure on outer London boroughs. Intensification on the scale being proposed will put extreme stress on the bus network, which cannot be solved without serious investment in and support for the bus network. This might for example include introducing more bus only lanes. If these targets are to be pursued, additional infrastructure like extensions to tube lines, increased Overground Network, Crossrail 2, trams and cycle highway improvements will also need be considered. If Crossrail 2 cannot get the required funding from Government, there needs to be consideration of an alternative strategy as much of the growth is reliant on delivering this new service. Also much of the infrastructure contributions being collected are expected to go towards Crossrail 2, if this does not go ahead, consideration will need to be given to how Mayoral CIL will be spent. Many of these boroughs want to accommodate growth, but know it may not be sustainable given current transport infrastructure.

Making better use of transport data

58. Given the amount of data being recorded about people's travel habits, we would like to see a greater commitment to using this data to develop transport plans.

User: Mr Ian Brixey

Transport ? There are no quality plans to improve public transport in the Outer London Boroughs. In my borough of Hillingdon public transport links between the north and south of the borough are very poor. Not everyone travels into central London for work! Car parking standards for new builds are proposed to be reduced so presumably more people will be expected to use public transport which would not be available. This poor planning centrally is borne out by the Mayor removing support for the extension of the Metropolitan tube line despite funds to build it being in place. The Mayor clearly doesn't think much of the Outer London Boroughs.

User: Wheels for Wellbeing

Chapter 10 – Transport

10.1 We strongly support the Mayor's strategic target of 80% of all trips in London to be made by foot, cycle or public transport by 2041, but would like to see stronger commitments made to interim targets. An inclusive cycling agenda must form a key part of any strategy aimed at increasing levels of cycling - the principles of which are outlined in our Guide to Inclusive Cycling.

10.2 We support the Mayor's aim to promote efficient and sustainable freight functions, including by cycle for shorter distances. As part of this it is important that businesses are incentivised to make greater use of cargobikes for last-mile deliveries (and crucially, that cycling infrastructure is built to accommodate the larger dimensions of such cycles).

10.3 We support proposals for cycle parking to be fit for purpose, secure and well-located, and that it should be designed in accordance with the LCDS. In particular, we are delighted to see the Mayor's commitment 10.5.5: "*cycle parking and cycle parking areas should allow easy access and provide facilities for disabled cyclists. This could include identifying and reserving specific spaces which provide step-free cycle parking and opportunities for people using adapted cycles, as well as providing facilities for other non-standard cycles such as tricycles, cargo bicycles and bicycles with trailers, for both long-stay and short-stay parking*"

Wheels for Wellbeing would be happy to work with the Mayor and TfL to help implement this policy and to provide technical assistance on design solutions for inclusive cycle parking.

This policy marks a significant step towards achieving better recognition for disabled cyclists. Just like all other cyclists, disabled cyclists need to know that when they leave the house they can be confident of locating adequate cycle parking and storage facilities at their destination. However, we would like to see the Mayor go even further and commit to:

- Ensuring that where new cycle parking facilities are installed, 5% of all spaces are allocated for use by disabled cyclists - matching equivalent provision for disabled car drivers;
- Developing a disabled cyclists' 'Blue Badge' scheme, which amongst other things could help in identifying cycles and cyclists genuinely entitled to park in specially reserved/allocated cycle parking bays.

10.4 We warmly welcome point 10.5.7, to ensure that accessible facilities for disabled cyclists are provided in places of employment. This cannot be stressed enough: without accessible facilities (e.g. inclusive cycle parking and accessible shower facilities) many disabled cyclists simply won't undertake a cycling journey in the first place.

10.5 Existing cycle hire facilities and schemes (e.g. Santander cycles) almost exclusively provide standard two-wheeled bicycles, which excludes many disabled cyclists, as well as families cycling with children and freight cyclists. At a minimum, we would recommend that all publicly-run cycle hire schemes in London should include at least e-cycles, which would dramatically broaden the demographic of people who can access cycling. To this end, we welcome steps already being taken by TfL to increase the availability of e-cycle hire.

We also recommend that cycle hire schemes partner with inclusive cycling hubs to widen their offer to include other forms of non-standard cycles through a personalised booking service (not through docking stations).

10.6 With regards to car parking for Blue Badge holders, thought should be given to the possibility of the co-location of disabled car and inclusive cycle parking bays. Similar considerations should also be made for the co-location of family car and cycle/cargo-cycle parking bays.

10.7 Whilst we welcome plans for all residential car parking spaces to provide infrastructure for electric or Ultra-Low Emission Vehicles (including charging points), an equivalent policy must also be developed to encourage and support the use of e-cycles. Furthermore, we oppose provision of charging points which result in trailing leads and/or which are positioned on the footway, as these create hazards for disabled people.

10.8 It is welcome to see commitments to ensure the provision of disabled persons' parking bays for all new residential developments. As a way of encouraging and supporting more disabled people to choose physically active lifestyles (and reducing reliance on car use), however, we would suggest that all new residential developments should also provide inclusive cycle parking and storage facilities. To this end, we would like to see the development of Cycle Parking Design and Management Plans.

An equivalent policy should also apply to all non-residential developments, including commercial, hotel, institutional and leisure developments.

User:	Eastcote Conservation Panel

The Mayor appears to have a vast number of improvement schemes for inner London, yet none for the suburbs.

The proposed car parking levels for this area [Eastcote] is not acceptable, reasons have been given in other chapters.

User:	London School of Economics

We welcome the revised parking policy and standards as a sensible contribution to good growth. However it should be recognised that this will have implications for borough finances, as parking fines are one of local authorities' few independent sources of revenue.

User:	London Assembly Planning Committee

11.1 We welcome the fact that the Draft Plan contains a series of measures that will help to enhance London's transport network, by delivering our shared ambitions for achieving a mode shift to sustainable transport and delivering healthy streets across London.
11.2 We support the objective, as set out in Policy T1, for 80 per cent of all trips made in London to be made by walking, cycling or public transport by 2041. We have already commented in response to the Mayor's draft Transport Strategy that interim targets should be set before 2041, and hope this proposal will be reflected in the London Plan.
11.3 The London Plan is a vital tool in the effort to transform London's street environments. We support the Mayor's Healthy Street agenda, as set out in Policy T2. Transport for London has developed a Healthy Streets check for designers, which should be applied to new developments to ensure they improve opportunities for Londoners to use active travel modes. The Health Committee also strongly supports the evidence-based approach set out in the Healthy Streets model to improve health and reduce health inequalities.

User: Better Bankside Business Improvement District

The transport objectives outlined in The London Plan, are ambitious and, if realised, will create an accessible, efficient and well-connected network. Better Bankside welcome and support the transport objectives set out in The London Plan. The focus on Healthy Streets will ensure that streets are well-balanced by prioritising sustainable transport modes over the private vehicle. The focus on Healthy Streets will further ensure that more people living and visiting in London walk, cycle and use public transport over other modes of transport.

Additional information is, however, needed to outline how the transport initiatives within The London Plan will be funded. This is especially relevant following the removal of Transport for London's (TfL) funding grant from the central government and as bus and Tube patronage decreases. The indicative list of transport scheme outlined the cost per scheme, with over half of all schemes noted as 'medium' to 'high' costs.

This section of the plan should outline how new transport offers, such as Uber, have impacted the current road space/the overall transport network, and how the proposed transport schemes will rebalance the road network in favour of sustainable transport.

Additional information is needed on how the proposed transport schemes will improve air quality across London and, in particular, central London. Further, the plan must outline how the proposed transport initiatives interact with other elements of the plan to improve air quality and note which initiatives can be brought forward to improve air quality.

The London Plan does not address the role new technology will have on the transport network, including both benefits and challenges.

User: London Cycling Campaign

Overall Response

The draft London Plan and the draft Mayor's Transport Strategy (MTS) both include he headline target that 80% of all personal trips will be made by public transport, cycling and walking (PTW&C) by 2041 instead of the current 62%. The London Cycling Campaign (LCC) warmly welcomes and strongly endorses this target. Indeed, given that the London Plan predicts that London's population will grow beyond 10.5 million by 2041 – equivalent to adding the current populations of both Birmingham and Manchester - mass mode shift to PTW&C is essential to stop London grinding to a halt. It is also essential to ensure that all those businesses and residents in the new, higher density mixed developments that the Plan is sensibly intended to promote have access to affordable and convenient transport. Moreover the importance of minimising car use to reduce air pollution, carbon emissions and inactivity-related illhealth cannot be overstated.

However, whilst strongly endorsing the cross-referencing of the 2041 mode shift target in the London Plan and MTS, LCC does have two high level concerns. The first is regarding road pricing. LCC has always argued that high quality cycling infrastructure, and traffic volume and speed reduction, are inseparable requirements for releasing the suppressed potential for cycling: therefore, as well as increased use of physical measures to reduce motor vehicle movements (e.g. in residential areas), the deployment of emerging digital technology to create smart road pricing is an absolute necessity. We would consequently like to see a commitment to trialling, refining and rolling out smart road pricing across London specified in the London Plan (and would like to see the reference to such pricing that is already contained in the MTS improved to echo this). Doing so would send an important signal to the market

Chapter 11 Funding the London Plan

User: Socialist Health Association London

FUNDING SHORTFALL

With a £1.23 trillion infrastructure projection it is deeply concerning to note that In 2015/16, London government only had direct control over 5.1 per cent of the tax it raised (council tax and 50 per cent business rates).

The Mayor is seeking clarity from Government on the availability of investment for much-needed infrastructure in the capital, and more fundamentally, is seeking further devolution of fiscal powers in line with the recommendations of the London Finance Commission.

‘Because of the scale of the funding gap, the Mayor is also exploring other potential sources of funding, such as land value capture, and looking at how private investors can play a bigger role in investing in the upfront costs of infrastructure. He has also, through this Plan and other strategies, set out how to make more creative and efficient use of existing infrastructure assets, for example, by managing demand for utilities and transport, using new technologies and changing user behaviours.’

Whilst we completely appreciate that the Mayor has a huge funding challenge on his hands, we do not want to see essential NHS assets used as a means to a short term gain but a long term loss.

We endorse the informed words of our member Jeff Lever

‘*We acknowledge the London Plan’s aspiration to create thousands of new homes. However, we consider that the concept put forward in the Chancellor’s Autumn Statement of 2015, that a sell-off of NHS land be carried out so as to release land for 26,000 homes, is simplistic and damaging, even if echoed uncritically in other quarters.*

There exist more nuanced opportunities for NHS land to deliver housing gain at the same time as providing health and welfare benefit to Londoners, and preserving the estate assets of the NHS.’

We hope that the Mayor will pay due regard to these well informed suggestions in future planning –

User: Joy Brown

CHAPTER 11: FUNDING THE LONDON PLAN.

Private funding will be needed and developers are not going to like some of the proposals so will fight their corner and compromise will be necessary.

User:	Joy Brown
11.1.60 Fiscal devolution of the type proposed would give far too much power to one person and his/her advisers.	

Chapter 12 Monitoring

User:	Regent's Park Conservation Areas Advisory Committees

Chapter 12 Monitoring
We welcome, in principle a KPI for heritage performance of the Mayor and GLA, but don’t understand what the current draft means. ‘KPI Impact of development on London’s heritage’ where the Measure would be ‘Positive trend in the reduction of harm and/or an increase in benefits to designated heritage assets in approved referable development applications (based on a rolling average).’
We would welcome discussion of a clearer policy.

User:	London Waste Planning Forum

17 Monitoring
No monitoring indicators are proposed for waste. The Mayor needs to commit to monitor waste management in London to see if the targets are being met. The Mayor needs to commit to monitor

- Arisings across major waste streams
- Achievement of waste targets set out in London Plan
- Imports and exports to and from London
- Net self-sufficiency and apportionment

Foreword

User: Mr Peter Eversden MBE

The Mayor's objective is supported that he will "plan for accommodating growth in a way which is environmentally, economically and socially sustainable." Also for 'Good Growth', avoidance of Londoners feeling excluded, community cohesion and social integration, high quality open spaces, parks and commons and the building of thousands of genuinely affordable homes, half of which are to be genuinely affordable. However, see comment on paragraph 1.4.3 which seems to require 65% affordable homes.

It is important that the Mayor is supported in achievement of his targets and objectives by his requirement for the Government to grant more powers and investment to London.

User:	Mr Peter Eversden MBE

The Mayor's Foreword lacks the objectives he expressed in 'A City for All Londoners' that methods of transport will keep pace with the number of people needing to travel. Also the aim in that document for air quality to be back down to safe levels as soon as possible.

User: mr david scherchen

I think that a great city needs to offer opportunity to all it's citizens.

This new plan seems to address this need.

It may also help to refocus seeing property as a home, not just an investment.

I also have a question: on the train into Waterloo, around Nine Elms and Vauxhall, I see blocks of flats, finished and unfinished, and I see the same thing in other parts of London: are these affordable? Are they occupied? I have read that a lot of these are iowned by investors, and if they are indeed empty that seems to be crying shame.

User: Mrs Lynne Bailey

I have concerns regarding the section on 'revolutionising the way we get around the city'. Many people are not able to increase the amount they can walk and may not be able to cycle eg (a number of) the elderly, the disabled, the very young. Whilst I believe a 'more active London' is a good thing, any additional opportunities for walking and driving should not be at the expense of other modes of transport. If you do this you are causing discrimintation against the groups I have mentioned above. (I realise some of these points are addressed later in the document, however the fact they are missing here could imply the relative importance of these groups).

User:	Miss Harriet Gatley
What does 'genuinely affordable' mean in reality? Afforable to whom?	

User: Mr David Harbott

I must emphasise my concern regarding the totally inadequate communication of the New London Plan and the short consultation period.

- No communication has been received by any of our local households from the Mayor of London or the London Assembly. As ‘one of the most crucial documents for our city’ a mailing should have been sent to every residence.
- No communication has been received from our local authority (Enfield). There would have been an opportunity to have featured the consultation in the ‘Our Enfield’ magazine, distributed quarterly to residents. However the December issue was presumably finalised before the London Plan was published on 29th November 2017, and the February issue, just received, is also totally silent on the London Plan.
- Residents in Hadley Wood no longer receive copies of free local papers, so even if the consultation was mentioned in the press, the local community would still not have been informed.
- At over 500 pages long, and with important references to supplementary analysis and policies, the plan is beyond the reach of all but a very small minority of Londoners to read, understand and to respond to. The plan needs to be supported by a clear and concise summary, with sections tailored to different local communities where the impacts will vary, explaining ‘what it means for you’. I have not found such a summary document.
- Even with perfect communication, a three month consultation period is inadequate for a document of this size and complexity. Given that the first consultation month was December where preparations for the Christmas festivities dominate everyone’s lives, the effective consultation period is only 2 months.

The introduction to the plan states that it will change London and will set planning strategy for the next 20-25 years. Londoners deserve the right to an effective consultation; this has not happened. A communication strategy to inform every household and an extended consultation period are both absolutely essential.

User:	Earthdome Ltd

Please include the following: I should like to encurage all those with inovative ideas and solutions for London to come forward and contact the Mayors office. It is proposed that a formal procedure will be put into place to handel these ideas an prosal on a regular basis.

User: Hadley Wood Neighbourhood Planning Forum

Dear London Plan Team,

This response is on behalf of the Hadley Wood Association and the Hadley Wood Neighbourhood Planning Forum. Before we comment on the content of the plan, we must raise serious concerns about the total lack of communication about the New London Plan and the public consultation.

- No communication has been received by any of our local households from the Mayor of London or the London Assembly. As ‘one of the most crucial documents for our city’ a mailing should have been sent to every residence.
- No communication has been received from our local authority (Enfield). There would have been an opportunity to have featured the consultation in the ‘Our Enfield’ magazine, distributed quarterly to residents. However the December issue was presumably finalised before the London Plan was published on 29th November 2017, and the February issue, just received, is also totally silent on the London Plan.
- Residents in Hadley Wood no longer receive copies of free local papers, so even if the consultation was mentioned in the press, the local community would still not have been informed.
- At over 500 pages long, and with important references to supplementary analysis and policies, the size and complexity of the Plan documentation are too daunting for most people. The plan needs to be supported by a clear and concise summary, with sections tailored to different local communities where the impacts will vary, explaining ‘what it means for you’. I have not found such a summary document.
- Even with perfect communication, a three month consultation period is inadequate for a document of this size and complexity. Given that the first consultation month was December where preparations for the Christmas festivities dominate everyone’s lives, the effective consultation period is only 2 months.

The introduction to the plan states that it will change London and will set planning strategy for the next 20-25 years. Londoners deserve the right to an effective consultation; this has not happened. **We believe that a new communication strategy to inform every household and an extended consultation period are absolutely essential.**

Moving on to the content of the plan, we welcome many of aspirational statements in the London Plan, particularly the Mayor's commitments to the environment, to good design, to accessibility, and his statement that 'good growth is not about supporting growth at any cost'. We also recognise the real need to increase the supply of housing across London and we support sympathetic and sustainable growth.

However we have grave reservations that proposed policies in the draft London Plan are in some cases logically inconsistent, and do not adequately balance the need for development with critical factors including accessibility, protection of the environment, preservation of character, and the availability of local services.

Our responses are primarily focussed on 'small sites' and the 'presumption in favour'. There is no consideration in the plan of the cumulative impact of developing very many small sites on accessibility, environment, character and services. This is a huge omission, given that the plan includes net housing completion targets of almost a quarter of a million homes on small sites, and in some suburban boroughs this is 78% of the total target.

Our responses are also informed by many years' actual experience of the intensification of land use in our own locality of Hadley Wood, a suburban village of around 1000 households, which historically grew up around a local station with an important Conservation Area core, but with very restricted public transport and very limited local facilities. The cumulative impact of numerous recent small scale developments in rear and side gardens has already resulted in surface water flooding incidents, an increase in car journeys and congestion, and detrimental changes to the character of the area, which, according to independent planning professionals, has reached a 'tipping point'. We have used this real experience to 'test' the logic of the draft policies, not because of any special case for Hadley Wood, but because the lessons are applicable across London, particularly in suburban communities.

Please see below a number of specific policy examples that demonstrate the inadequate balance between development, accessibility, the environment and character.

1.Chapter 1, ‘Making the Best Use of Land’ includes a number of overarching and aspirational statements that appear reasonable. However, some of the detailed policies later in the plan are inconsistent with these statements. For example;

a.Paragraph 1.2.4 talks of ‘directing growth to the most accessible and well-connected places’, whereas;

Policy H2 Small Sites, includes ‘presumption in favour’ for ‘underused sites’ and ‘infill development within the curtilage of a house’, without any reference to the level of public transport.

Given that nearly 40% of new homes across London are planned to be on small sites (and up to 78% in some outer London Boroughs), there is a clear conflict between these statements.

Presumption in favour should only apply for small sites in the most accessible and well-connected places.

b.Paragraph 1.2.3 infers that appropriate locations are ‘places where local amenities are within walking and cycling distance, and public transport options are available for longer trips’.

However Policy D6 ‘Optimising Housing Density’ states in paragraph 3.6.2 ‘It will not be normally necessary for minor developments to undertake infrastructure assessments or for boroughs to refuse them on the grounds of infrastructure capacity’.

This could lead to the construction of a quarter of a million new homes on incremental small sites without any infrastructure assessment.

The cumulative impact of increasing density and small site development must be covered by additional robust and definable policies that assess both local amenities and accessibility.

Presumption in favour should only apply for small sites and increasing density in places where there are adequate local amenities.

2.Many terms used in the Plan are ambiguous and inadequately defined.

a.For example, what are ‘underused sites’ referenced in H2? A garden may be an important local amenity for wildlife, mature trees and local drainage. Just because it has not been built on it does not mean it is underused.

b.Similarly, what are ‘appropriate locations’ and ‘the most accessible and well-connected places’?

Several policies quote ‘public transport access levels (PTALs) 3-6 OR located within 800m of a Tube station, rail station or town centre boundary’ as the definition of accessibility.

Therefore a suburb like ours, with a rail station but a very limited rail service of currently only 3 trains per hour, no regular bus service, and a maximum PTAL of only 1b, would be treated for planning purposes in exactly the same way as a location served by 20 tube trains per hour and good bus inter-connectivity in PTAL 6b.

This is totally unrealistic, and if unchanged, would lead to development in areas without adequate public transport, resulting in an increase in car use; an unintended consequence of poorly worded policies and in direct conflict with the ‘Mayor’s target for 80% of all journeys to be made by walking, cycling and public transport’.

Appropriate locations should be more appropriately defined, for example as **‘public transport access levels (PTALs) 3-6 AND located within 800m walking distance of a Tube station, rail station or town centre boundary’.**

c.And what are a reasonable ‘set of local amenities’ to define an ‘appropriate location’ in 1.2.3?

Our suburban location has no NHS GP surgery, no NHS dentist, no bank, building society or post office, no secondary school, an over-subscribed primary school, no direct public transport access to the nearest hospitals, a single ‘corner-shop’ convenience store, no public house, and is in PTAL zones 0, 1a & 1b.

Additional development in our community, and similar suburban areas, increases car use and negatively impacts congestion and air quality, in contravention with other plan policies.

A definition is required of the minimum set of local amenities necessary for presumption in favour of approval to be appropriate.

3.There is a lack of balance between the policies about Land Use, Housing Density, Housing Supply and Small Sites and the Environmental Policies that cover Urban Greening, Trees, Air Quality, Flood Risk and Sustainable Drainage.

a.For example, we can find no explanation of how ‘presumption in favour’ will be weighted in a planning decision in comparison to, for example, loss of a significant number of mature trees or a risk of surface water flooding. Recent experience of planning decisions would suggest that too little weight is given to Environmental Issues, and this will be perpetuated by the current wording in the London Plan, with statements such as;

‘Development proposals should ensure that, wherever possible, existing trees of quality are retained’ (G7 C).

‘Development proposals should aim to achieve greenfield run-off rates …’ (SI13 B).

Stronger, mandatory tree protection policies, are required, if the London Plan is to meet environmental targets such as ‘delivering 50% green cover across London’ and ‘to increase tree cover in London by 10%’.

These are equally important in addressing flood risk (see b below).

b.Policy SI12 Flood Risk Management, states that ‘Development proposals which require specific flood risk proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed’.

Based upon current policies, the majority of small sites do not require a specific flood risk assessment. However the cumulative impact of small site development has, based upon real experience, resulted in surface water flooding, waterlogging of neighbouring sites, and increased fluvial flood risk to local water courses.

New flood risk policies are required to cover the cumulative impact of small site development.

4.Character of the Area & Design Codes, Conservation Areas and Neighbourhood Plans

Policy H2 Small Sites, states that ‘presumption in favour means approving small housing developments which are in accordance with a design code’.

Although the London Plan Team intend to produce guidelines for the preparation of ‘design codes’, these will not be available before the end of the consultation period. It is therefore impossible to assess how effective they may be in protecting elements of the character of the area that are important to local residents.

In addition, ‘where there is no such design code, the presumption means approving small housing development unless it can be demonstrated that the development would give rise to an unacceptable level of harm to residential privacy, designated heritage assets, biodiversity or a safeguarded land use …’.

These criteria are both difficult to measure and not comprehensive. They do not reference harm to the character of the area in terms of architectural design, loss of trees and greenery, loss of views and light. They do not reference harm in terms of flooding and waterlogging. They do not reference harm in terms of congestion.

Presumption in favour where there is no design code must be balanced by a better defined and more comprehensive set of compliance criteria.

Presumption in favour does not apply for Statutory Listed Buildings (H2 F1). This should be expanded to include Conservation Areas, which are important heritage assets that define the character of the Area.

Presumption in favour should not apply to conservation areas.

The London Plan makes no clear reference to 'Neighbourhood Plans', particularly with respect to Character. In the forward to the London Plan the Mayor states 'And it's about delivering a more socially integrated and sustainable city, where people have more of a say and growth brings the best out of existing places while providing new opportunities to communities'. Local Communities are putting huge efforts into Neighbourhood Plans that define the local character and establish local design guidance. This is 'what the people say' and should be referenced.

Presumption in favour should be for developments which are in accordance with a design code and the Neighbourhood Plan (where applicable).

In conclusion, we reiterate two key messages;

Communication of the London Plan and the consultation has been inadequate. The forward by the Mayor states ‘Many Londoners won’t know about or have come across the London Plan, but it shapes their lives on a daily basis. It is one of the most crucial documents for our city ……..’.

Many Londoners still don’t know, and without a new communication drive and an extended consultation period, won’t have had the opportunity to respond. Please extend the consultation period and provide better communications to support it.

The Mayor also states that ‘good growth is not about supporting growth at any cost’. However there is significant discrepancy between policies such as D6 Optimising Housing Density and H2 Small Sites (with presumption in favour) and the aspirational statements in policies GG2 Making the Best Use of Land, G5 Urban Greening, G7 Trees, and SI12 Flood Risk Management. Better definition of ‘the most accessible and well-connected places’ and ‘local amenities’ are essential as are policies that take account of the CUMULATIVE IMPACT of numerous small site developments on flood risk, tree retention, car use, character and local infrastructure. Without appropriate checks and balances there will be unintended negative consequences of poorly controlled small site development of a quarter of a million new homes.

We are very happy to receive supplementary questions on these points, to meet the London Plan Team to discuss these issues, and to attend the Examination in Public.

Kind regards, David

David Harbott

On behalf of the Hadley Wood Association

On behalf of the Hadley Wood Neighbourhood Planning Forum

User: London Forum of Amenity and Civic Societies

The Mayor writes in the Foreword "Many Londoners won’t know about or have come across the London Plan, but it shapes their lives on a daily basis. It is one of the most crucial documents for our city, and what it contains shapes how London evolves and develops over coming years."

It is essential that people in London do know about the London Plan and contribute to its development. However, despite the details about the draft New London Plan on the GLA web site and in emails to those who had subscribed, there was very little notification to citizens that the opportunity existed to comment on the draft document and its associated papers.

A lot of the informing of communities about the New London Plan had to be done by the London Forum of Amenity and Civic Societies, the Just Space network and voluntary groups.

For all GLA and TfL consultatiions in future, the boroughs in London should use their Statement of Community Involvement process to notify all those organisations and people that they would normally inform about the opportunity to respond to the Mayor or TfL on draft proposals published.

Secondly, the Mayor's Foreword lacks the objectives he expressed in 'A City for All Londoners' that methods of transport will keep pace with the number of people needing to travel. Also the aim in that document for air quality to be back down to safe levels as soon as possible.

User:	Mr Chris Gannaway

I belive that steady increase in population predicted 1) should not be encouraged as growth canot be infinite 2) in the light of BREXIT are the predictions to be belived. Consider that no population limit or control has been considered and an assumption that London can take whatever numbers of people it can fit in.

User: Ms Julie Nedza

The mayor's opening statement happily states that 'many Londoners will know nothing about the London Plan'.....

That is still the case, there has been no consultation with ordinary Londoners who will be affected by this. The consultation process needs to be extended and a proper communication stratey put in place.

We do need more housing in London but this is not the right approach. London is for everyone not just the bureaucrats - this does not reflect well on the Mayor.

User: Ms Meenakshi Sharma

p xiv para 'Some of the very richest and poorest people in the country live in London, with life expenctancy differing by up to 19 years between boroughs.

It is very important to note that this inequality is also within boroughs and some boroughs in particular have a very marked difference between wards, with some neighbourhoods in the top 20% of affluence and some in the 20% of most deprived.

This Plan will, we fear, exacerbate these inequalities by the spatial strategies it advocates.

User: Ms Torla Evans

The overall stated aims of making sure we build enough affordable housing and facilitate policies in order to make sure that under represented minorities are not disadvanteged is a laudable aim , but the devil is in the detail . Londoners earning between £60 000 and £90 000 are provided with help and incentives to part buy, part rent properties, There is no such help for those on much lower incomes. The London Living wage should be promoted so that it becomes the minimum amount an employer will offer employees rather than an upper limit which they fight to stay below. Local councils who claim to promote this policy for themselves as employers and for those businesses seeking to operate within their borough should be advised to make sure this happens . Example : Lambeth council says it promotes the London Living Wage . They are in co operation with Cineworld PictureHouse cinemas in West Norwood where the delayed Picture House cinema and Library is due to open. Wages are not at the London living wage level so why can't the council write this into their contracts ?

User: London national Park City Foundation

Foreword

The London National Park City Foundation (LNPCF) supports the Mayor's intention in his Foreword:

- Page xiii: "This new London Plan marks a break with previous London Plans, represents a step-change in our approach and serves as a blueprint for the future development and sustainable, inclusive growth of our city."
- Page xiv: "We let down future generations if we do not properly plan for accommodating growth in a way which is environmentally, economically and socially sustainable.
- "So this London Plan sets out a new way of doing things, something I am calling Good Growth. Good Growth is about working to re-balance development in London towards more genuinely affordable homes for working Londoners to buy and rent. And it's about delivering a more socially integrated and sustainable city, where people have more of a say and growth brings the best out of existing places while providing new opportunities to communities.
- "Good Growth is not about supporting growth at any cost, which for too long has been the priority, leaving many Londoners feeling excluded and contributing to a lack of community cohesion and social integration."
- Pages xv and xvi: "…And a city where access to great culture is built into the fabric of every part of London, with our rich heritage and cultural offer supporting our growing world-class creative industries."

  "I also see the London Plan revolutionising the way we get around our city - enabling a boom in active travel, with walking and cycling becoming the primary, default choice for millions of Londoners because we have made it far easier and safer. I envisage London as a greener city, with high quality open spaces, parks and commons, and one where we lead the way in tackling climate change by moving towards a zero-carbon city by 2050. And when I look to the future, I see London as a city with clean air for our children to breathe…"

Habitats Regulations Assessment

User: Natural England

Appendix 1 – Natural England's response to Habitats Regulations Assessment (HRA)

As a high-level spatial Plan, the London Plan sets Borough-level housing targets but does not allocate specific sites. It is therefore appropriate for the HRA to assess only the scope for impacts which may arise directly or indirectly as a result of those broad housing targets which could not otherwise be adequately mitigated for through local spatial development and development management policy. As such, Natural England is in general agreement with the conclusions of the HRA, however we have a few specific concerns which we would like to see addressed.

In relation to the air pollution impact pathway, the draft HRA refers a number of times to mitigation measures in the as yet not adopted Mayor's Transport Strategy (MTS). Currently the MTS constitutes only a list of potential options for reducing and mitigating air pollution, and there is therefore no certainty that these measures will be implemented. The precautionary principle embedded within the Habitats Regulations (2010) as amended requires that greater certainty is provided that adverse effects will be avoided. As such, we consider that greater clarity in needed regarding the availability of options to mitigate and reduce air pollution outlined in the MTS in relation to the timing of housing brought forward within the plan, which if unavailable at this time may have the capacity to lead to air pollution impacts. This detail should be included in a revised version of the HRA.

We strongly support the recommendations laid out in Sections 7.5.1 and 7.6.1 of the HRA which make provisions for i). The Plan to be revised to direct the London Boroughs of Waltham Forest, Redbridge (and also possibly Newham and Enfield) to participate as appropriate in the mitigation strategy for Epping Forest SAC, and ii). to acknowledge that monitoring of progress with the delivery of these housing targets in tandem with the success of the solution to improve air quality and recreational activity in the SAC may trigger a need to revise the targets in the future, although there is no specific reason to believe that the strategy would not be able to address the impacts of anticipated development.

In relation to Lee Valley SPA, we note that the plan states in Section 8.5 that ‘Recreational disturbance is therefore not considered an issue for growth in London since Walthamstow Reservoirs are currently considered an underused recreational resource and is thus has been opened up to the public as part of the carefully planned Walthamstow Wetlands project’. However, contrary to this assertion, we do not consider that the opening of Walthamstow Wetlands to the public prohibits the possibility of current and future recreational disturbance impacts under the policies in the Plan. Given the increased accessibility of the site, recreation is now being monitored, and the outcome of this survey may inform future mitigation. Therefore we recommend that this text is re-drafted to acknowledge that recreational disturbance may have the capacity to result in a likely significant effect on the SPA in the absence of appropriate mitigation. Sources of appropriate mitigation should also be identified in Section 8.5.

Integrated Impact Assessment

User: Ms Leslie Barson

I do not think the Intergarted Impact Assessment (IIA) carried out by Ove Arup & Partners Ltd is fit for purpose for the following reasons:

1. The process has not been in line with the Supreeme Court's requirements of a fair consultation.The IIA idid not take place at the formative stages of the proposal. Nor is the current consulation eaily accessible on the GLA website. The consultaiton has taken place too late in the process. .

2. The SAE Directive statesThe sustainability appraisal should predict and evaluate the effects of the preferred approach and reasonable alternatives and should clearly identify the significant positive and negative effects of each alternative". Where are the alternatives suggested and anaylsied? We would like to suggest that a community-generated alternative option be part of the process such as Just Space's publication Towards a Community Led Plan for London'.

3. The graphs in the IIA used to digest much information and then coloured coded to show acceptablity are far too vague in what the axies terms are, what the parameters are and what they are concluding . There is too much informatuon with little differentiation between either groups or boroughs. This is also too much either unknown or left blank on these graphs to make a reasonable decision about their conclusions. The analysis in this IIA Report is too generalised. It writes of environmental and health issues in overly general and vague terms, obscuring the complexities and specific health issues/needs of diverse groups

4.

the IIA is required to inlcude the preparation of a health inequalities strategy /promoting reduction of health inequalities. Many of the objectives and guiding questions for each topic do not address each of these such as equalities or health despite the attempt to colour code questions in fig.7.3. In particular, equalities impacts are under-represented in the IIA SR. For the IIA to be of use, all of components of the assessment should be given appropriately adequate weight in order that the objectives and guiding questions are properly devised. Section A.4.3 also says that there will be a separate Equalities assessment which is contradicted by section A.3.7 which states that the Equalities assessment is an integral part of the IIA.

5. The IIA process should clearly set out and commit to definite actions that are assured to result in the plan or strategy being amended to minimize negative impacts, optimize positive ones and compensate for losses as it progresses throughout its preparation. If it does not done this adequatly and therefore has not done what an impact assemssment is required to do,

6. The Examination in Public (EiP). Section 1.2.4 states that both the draft London Plan and the IIA will be subjected to London Plan IIA: However, it is not clear to what degree the IIA will be open to critical scrutiny, particularly at the EiP.

Thank you

User: London Community Neighbourhood Co-operative

We, London Commuity Nieghbouhood Co-operative (LCNC) do not think the Intergarted Impact Assessment (IIA) carried out by Ove Arup & Partners Ltd is fit for purpose for the following reasons:

1. The process has not been in line with the Supreeme Court's requirements of a fair consultation.The IIA idid not take place at the formative stages of the proposal. Nor is the current consulation eaily accessible on the GLA website. The consultaiton has taken place too late in the process. .

2. The SAE Directive statesThe sustainability appraisal should predict and evaluate the effects of the preferred approach and reasonable alternatives and should clearly identify the significant positive and negative effects of each alternative". Where are the alternatives suggested and anaylsied? We would like to suggest that a community-generated alternative option be part of the process such as Just Space's publication Towards a Community Led Plan for London'.

3. The graphs in the IIA used to digest much information and then coloured coded to show acceptablity are far too vague in what the axies terms are, what the parameters are and what they are concluding . There is too much informatuon with little differentiation between either groups or boroughs. This is also too much either unknown or left blank on these graphs to make a reasonable decision about their conclusions. The analysis in this IIA Report is too generalised. It writes of environmental and health issues in overly general and vague terms, obscuring the complexities and specific health issues/needs of diverse groups

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the IIA is required to inlcude the preparation of a health inequalities strategy /promoting reduction of health inequalities. Many of the objectives and guiding questions for each topic do not address each of these such as equalities or health despite the attempt to colour code questions in fig.7.3. In particular, equalities impacts are under-represented in the IIA SR. For the IIA to be of use, all of components of the assessment should be given appropriately adequate weight in order that the objectives and guiding questions are properly devised. Section A.4.3 also says that there will be a separate Equalities assessment which is contradicted by section A.3.7 which states that the Equalities assessment is an integral part of the IIA.

5. The IIA process should clearly set out and commit to definite actions that are assured to result in the plan or strategy being amended to minimize negative impacts, optimize positive ones and compensate for losses as it progresses throughout its preparation. If it does not done this adequatly and therefore has not done what an impact assemssment is required to do,

6. The Examination in Public (EiP). Section 1.2.4 states that both the draft London Plan and the IIA will be subjected to London Plan IIA: However, it is not clear to what degree the IIA will be open to critical scrutiny, particularly at the EiP.

User: Ms Jane Hickson

In my opinion, the consultation has come too late in the process, it has not been publicised well enough to ensure a wide variety of responses and has not been made open and accessible enough to get a really representative response from Londoners. This does not sit well with the Supreme Court's requirements for a fair consultation and therefore I am questioning its whole validity.

The information contained in the Integrated Impact Assessment is very generalised, often vague and lacking in substance. It does not provide in-depth discussion or analysis of what are very complex and varied issues faced by different London boroughs. There is a lack of real understanding of the questions that need to be asked and of the issues that need to be covered in a document like this. I think that the assessment of impact both negative and positive has not been carried out effectively enough to be taken seriously.

For example, regarding health issues, the graphs are not easy to follow being either overly simple, lacking in information or too complicated in their presentation. There are too many unknowns to make them really valid. There is no proper analysis of the information given and the information is not always relevant. In my view there are many questions that have been overlooked and many issues that have been ignored. There does not appear to have been an attempt to truly understand what the real issues are, to clearly define them and to represent them in a meaningful way that will lead to meaningful discussion and in-depth analysis and then to meaningful outcomes and strategies for managing the issues.

In conclusion I feel that this document is not adequate in its depth of information, analysis and conclusions. I also think that the amount of time allowed for consultation is not adequate and that it undermines the democratic process.

User: Ms Sian Fletcher

I do not think the Interrogated Impact Assessment (IIA) carried out by Ove Arup & Partners Ltd is fit for purpose for the following reasons:

1. The process has not been in line with the Supreme Court's requirements of a fair consultation. The IIA did not take place at the formative stages of the proposal. Nor is the current consultation easily accessible on the GLA website. The consultation has taken place too late in the process. .
2. The SAE Directive states: The sustainability appraisal should predict and evaluate the effects of the preferred approach and reasonable alternatives and should clearly identify the significant positive and negative effects of each alternative". Where are the alternatives suggested and analysed? We would like to suggest that a community-generated alternative option be part of the process such as Just Space's publication Towards a Community Led Plan for London'.
3. The graphs in the IIA used to digest much information and then coloured coded to show acceptability are far too vague in what the axies terms are, what the parameters are and what they are concluding. There is too much information with little differentiation between either groups or boroughs. This is also too much either unknown or left blank on these graphs to make a reasonable decision about their conclusions. The analysis in this IIA Report is too generalised. It writes of environmental and health issues in overly general and vague terms, obscuring the complexities and specific health issues/needs of diverse groups
4. the IIA is required to include the preparation of a health inequalities strategy /promoting reduction of health inequalities. Many of the objectives and guiding questions for each topic do not address each of these such as equalities or health despite the attempt to colour code questions in fig.7.3. In particular, equalities impacts are under-represented in the IIA SR. For the IIA to be of use, all of components of the assessment should be given appropriately adequate weight in order that the objectives and guiding questions are properly devised. Section A.4.3 also says that there will be a separate Equalities assessment which is contradicted by section A.3.7 which states that the Equalities assessment is an integral part of the IIA.
5. The IIA process should clearly set out and commit to definite actions that are assured to result in the plan or strategy being amended to minimize negative impacts, optimize positive ones and compensate for losses as it progresses throughout its preparation. If it does not done this adequately and therefore has not done what an impact assessment is required to do,
6. The Examination in Public (EiP). Section 1.2.4 states that both the draft London Plan and the IIA will be subjected to London Plan IIA: However, it is not clear to what degree the IIA will be open to critical scrutiny, particularly at the EiP.

User:	Newham Union of Tenants

While we support the concept of growth corridors, we do not consider that the Plan has adequately reviewed alternative development options in relation to both quantitative and qualitative outputs, despite the comparison of strategy options in the Integrated Impact Assessment.

User: Royal Borough of Kingston

2.1 RBK recognises the significant challenges of meeting London's housing need within an often dense urban form and constrained by the Green Belt. RBK supports good growth, and jointly published Kingston's Direction of Travel with the Mayor. However, the reliance on the small sites approach to, in the case of RBK, double the housing target is flawed and undeliverable, with severe consequences for the borough which will undermine the delivery of growth. The addition of the small sites effectively doubles the borough's housing target, and well above the current average annual delivery by 300%.

2.2 Delivery of new homes through the small sites approach makes up a very large proportion of the new homes targets, particularly in Outer London boroughs. This is a very significant increase on windfall sites, most of which will not deliver affordable housing. The overall strategic approach will impair the borough's ability to secure affordable housing alongside market housing and significantly lower the overall proportion of new homes that come forward in affordable tenures. In Kingston, for example, almost half of the housing target would come from sites that are not delivering affordable housing.

2.3 The number of small sites anticipated represents a 90% increase on current delivery. It is accepted that there may be a latent demand for this type of intensification which is currently hidden due to discouraging local policies. However, evidence from Croydon, which has strong policies and local agencies to promote intensification suggests that the levels of intensification assumed in the London Plan are unrealistic.

2.4 The plan directs significant growth to local town centres and suburbs, which will alter the character of these areas significantly. The small sites approach, which covers approximately 90% of the developable land in Kingston, would drive a significant shift from houses to flats. This is accompanied by strengthened Green Belt and Metropolitan Open Land (MOL) policy protections. Alternative approaches have not been properly considered and there has been no meaningful engagement with local communities at a grassroots level. This includes consideration of whether there are any areas of Metropolitan Open Land or Green Belt across London where development could be realised in a way which minimises harm and at the same time reduces the scale of impact on London's town centres and suburbs. The IIA considers 'options' in a shallow and binary way which does not suggest proper consideration of a *range* of approaches to deliver housing - rather a mechanistic application of the small sites approach to make up the shortfall between the capacity identified through the London Development Database and London's housing need. It is clear that communities place immense value on their Green Belt and Metropolitan Open Land. However, they also value their suburbs, gardens and town centres.

2.5 The small sites approach is premised on good public transport accessibility. However, this suggests a flawed understanding of Outer London. Appendix 2 shows that in Kingston, much of the areas subject to the small sites presumption have relatively poor public transport accessibility. If retained, the policy should be amended to only include those areas with a PTAL of 3 or more. The criteria for refusal under the presumption is also limited to a very narrow set of criteria, but excludes design quality, overshadowing, access to outdoor amenity space, noise, energy efficiency, internal layout and space standards and transport issues. It is considered that the exclusion of significant sections of the London Plan and local plans is unacceptable and exceeds the legislative powers of a Spatial Development Strategy. Moreover, it would result in poor quality accommodation, giving rise to detrimental health and well-being outcomes and the erosion of the quality of neighbourhoods. It is entirely unacceptable to suggest that a poor development would not be able to be refused on grounds of poor design. It is also noted that flat conversions are often the least satisfactory type of home in terms of the quality of the living accommodation, and such developments should therefore be subject to more rigorous assessment, rather than less.

2.6 Rather than make housing available, this approach may in reality drive up house prices as the market value of a family home is re-assessed as the value of a development site with multiple housing units. There does not appear to include any assessment of the impact this approach may have on the affordability of family housing in the Integrated Impact Assessment.

2.7 The outcome of undeliverable housing targets is that boroughs will fail to deliver the required numbers of homes, as assessed through the Housing Delivery Test, and fail to adopt new local plans to plan for growth due to the soundness test of ‘deliverability’. This will be exacerbated by the significant windfall reliance, sites which are unlikely to contribute to the 5 - 15 year housing land supply. Both of these outcomes will diminish local authorities’ ability to deliver good growth (through the ‘tilted balance’ set out in the NPPF and the lack of up to date policies), enabling poorer developments to proceed, and further eroding public confidence in the planning system to deliver good growth. These outcomes are the antithesis of what the new London Plan should, and needs to, deliver. RBK is also concerned that, depending on the outcome of national changes, these targets could impact on local authority finance in relation to the New Homes Bonus and planning fee increase, further reducing the availability of funding to deliver planning services. It is currently unclear whether or not this income will be linked to a local authorities’ housing target, or different measures.

User: Royal Borough of Kingston

3.1 The aim of Policy GG5 (B), to share more equitably the economic success of London is supported. However, RBK does not consider this ambition to be expressed in other sections of the document and it is noted that the IIA rejects the option of a polycentric city. Instead the London Plan seeks to strengthen the economic offer of central parts of London without looking to increase employment capacity across London alongside significant increases in housing. Without explicit London Plan policy support, RBK will struggle to deliver new local employment floorspace to counterbalance the housing growth, increasing pressure on transport networks, reducing quality of life and failing to meet the needs of local businesses and potential businesses. The equalities impact of this approach is also poorly addressed. This approach will mean that outer London areas increasingly operate as dormitories by providing the workforce for a very centralised employment offer, but not providing the necessary local capacity for enterprise and employment. RBK suggests amendments to the approach to enable District town centres to secure new office and employment floorspace for a local/borough level catchment, rather than just small office protections. For larger town centres such as Kingston, this should be growth to support a sub-regional catchment, and should not be constrained by delivery of Crossrail 2.

3.2 RBK is also very concerned about protection of identified industrial locations. For successful areas such as those in Kingston, the policy should continue to protect the total amount of land, not merely *capacity* , to support future intensification and therefore *increased* future employment and economic benefits. This again would support local employment and enterprise alongside housing growth, to create a more sustainable city.

User: London Borough of Redbridge

The draft London Plan places a renewed focus on Opportunity Areas linked together by transport corridors which is welcomed and supported. The Mayor expects delivery of substantial numbers of new homes including affordable housing and jobs in these areas. Further, representing a particular step change, the plan gives explicit reference to outer London where the suburban pattern of development is considered to have significant potential for appropriate intensification over time, particularly for housing. The Council is concerned that a growth strategy focused so strongly on intensifying existing urban areas and suburbs to deliver housing has the potential to undermine efforts to secure the necessary supporting social and community infrastructure, creating places that do not function as sustainable places for people to live. It is difficult to see how these ambitions will be achieved without very high levels of intervention in these areas e.g. large site assembly efforts to secure school sites.

Paragraph 2.03 of this section needs to recognise that the changing nature of the suburbs continues to be a key concern for communities. It is imperative that existing communities feel comfortable with local changes and that new developments are desirable places to live and work. This is a particular issue which the Council has had to manage in the development of its own Local Plan. The level of growth proposed within Redbridge is of concern to our residents and what is being proposed in the London Plan will further exacerbate this, particularly from an infrastructure perspective. Existing character of areas is valued and important and the Council believes the new London Plan needs to have this at the centre of the strategy to accommodate future growth.

In the examination of our Local Plan, the Inspector acknowledges that the Council’s vision of managing growth and investment and overall spatial strategy is supported by comprehensive evidence of the needs and opportunities facing the borough. Directing investment and growth to Ilford, the wider Crossrail Corridor, Gants Hill, Barkingside and South Woodford, the main town centres and other identified Opportunity Sites is fully in line with the NPPF. Overall he concludes that the strategy set out in the Plan of focusing development in Investment and Growth Areas across the borough with some release of green belt land is sound and appropriate for the future of Redbridge. Our comments on the draft London Plan are made within this context.

Various options to help meet the borough’s minimum housing target to help close the gap were looked at as part of the Local Plan sustainability appraisal work. This involved testing various growth options or reasonable alternatives to arrive at the most sustainable option for the borough. One of the options considered was higher intensification and no green belt release which sought to exhaust all densification opportunities and avoid removing land from the green belt. It is considered that this option essentially reflects the Mayor’s proposal in the draft London Plan. Whilst it performed well against housing objectives, this option showed a negative impact upon townscape, character and the ability to deliver much needed infrastructure. The Council’s preferred strategy, densification in appropriate locations alongside managed release of green belt, was considered to be a more balanced approach.

User: Just Space

Integrated Impact Assessment

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

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

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

User: Just Space

The first part of this response sets out Just Space's understanding of the process to date:

The IIA process is an integral part of good plan-making that identifies and reports on the likely significant effects of the London Plan and the extent to which implementation of the London Plan will achieve sustainable development. Its aim is to help identify and assess different strategic options and help advise on the most sustainable solutions. As a strategic-level quantitative and qualitative assessment, it is based on broad assumptions and judgements. (IIA Scoping Report Feb 2017, section 3)

The IIA for the draft new London Plan (Nov 2017) was prepared by Arup following the GLA's Scoping Report (Feb 2017), published in November 2017 and is open for public consultation until March 2nd2018.

Four of the main statutory requirements have been incorporated/ integrated:

Strategic Environmental Assessment (including Sustainability Assessment),

Equality Impact Assessment, Health Impact Assessment, and Community Safety Impact Assessment.

(Habitats Regulation Assessment is published separately)

The IIA Framework has 24 IIA Objectives setting out desired directions of change. Each has several guide questions used to assess whether the Plan will help to achieve or conflict with the IIA Objectives. For example, an IIA Objective: "To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs of the population". Will the strategic option/ policy (Guide Questions): "reduce poverty and social exclusion? Promote a culture of equality, fairness and respect for people and the environment? …."

Each strategic option (chapter 1 Good Growth policies) and every policy (chapters 2 to 11) were so assessed, and the results summarised and portrayed in a series of colour coded matrices, positive to negative. In some instances, recommendations were made to the GLA to refine policies. GLA made responses.

IIA Process - Stages and Opportunities for Community Involvement

Stage A (Scoping Report) context and objectives – *some stakeholder consultation in June 2016*

Stage B (Assessment) develops and refines alternatives and assesses impacts - *NOT opened for public consultation*

Stage C (IIA Report) preparation

Stage D (Consultation) publication of the draft revised strategy and associated IIA report - *NOW*

Autumn 2018: Examination in Public – *debate on IIA depends on representations made by 2nd March*

Inspector reports to Mayor who considers to make any changes to draft new LP – *not made public*

Mayor submits draft new London Plan to Secretary of State (for 6 weeks) and, now in public, to the London Assembly for consideration.

Stage E (Monitoring) the new London Plan will be monitored throughout its life - *but how community will participate in monitoring as monitoring framework will be developed after EiP?*

Having regard to the above and to the critique that follows, Just Space considers that the IIA is not fit for purpose and that substantial further work should be undertaken on it before the Examination in Public and puts at risk the plan-making process.

We have the following grounds for viewing the IIA as unfit for purpose: [subesquent comments uploaded separately]

User:	Just Space

1. Non availability of accessible formats:

Just Space is advised that none of the impact assessments have an Easy Read version, no British Sign Language (BSL) or Makaton (https://www.makaton.org/ Makaton uses signs and symbols to help people communicate) versions. So, the consultation remains inaccessible for people who need these formats and could be held to be contrary to the Equality Act, as well as the European Convention on Human Rights, and international law (e.g. Marrakesh Treaty) and global law (especially the UN Convention on the Rights of Persons with Disabilities).

Just Space has from time to time urged the London Plan team to give serious thought and resources to wide dissemination of the London Plan and the issues within it (and the Mayor's strategies); most recently in our meetings last summer, 2nd August. We spoke of video, short versions of printed / online reports and we showed them the short version of the Abercrombie Plan of 1945 published by Penguin Books, Carter, E. J. and E. Goldfinger (1945) The County of London Plan explained West Drayton, Penguin. Also a case study of an Oxford initiative at making a publicly accessible version of plans http://city-voice.org .

User: Just Space

2. It fails adequately to evaluate the key alternatives available to London and the London Plan Process.

Just Space was pleased to be able to see the Scoping Study and have a number of meetings with the London Plan team, one of which also included the Arup staff member undertaking the IIA. We made strong statements about at least some of the alternatives which needed to be explored, most of which had already been drawn together by Just Space in the Community-led London Plan. That document was not just a sketch on the back of an envelope but the outcome of hundreds of people, mostly from bodies representing others, gathering in 3 conferences and a number of working parties over 2 years. It is a carefully considered alternative and should have been considered. (See Appendix: Proposal for a Community Generated Spatial Option)

The GLA team rejected this suggestion, proposing instead that the IIA would explore variants of each of the Mayor's 6 main objectives and (separately) a number of alternative spatial strategies. We had no choice but to go along with this approach and accordingly submitted suggested wordings for the 6 objectives and a summary description of the spatial dimension of the Community-led Plan (meeting of 2 August 2017 and later exchanges). The outcome is that, in our view, key choices embedded in the London Plan have not been evaluated or evaluated adequately, including:

- inclusion / exclusion of extensive council estate demolition
- emphasis on increased radial transport capacity (CR2 etc) versus improved suburban bus and orbital rail investment
- implementation / deletion of Lifetime neighbourhood / Lifetime suburb concept to improve quality of life and reduce the need to travel
- pursuit of a substantially lower population growth trajectory as part of a national re-balancing and/or a reduction in net in-migration associated with Brexit

European Commission's guidance accompanying the EU Directive: discusses alternatives within plans (e.g. alternative policies) – 'internally'; and different or alternative options in preparing the Plan – 'externally'. It also references scenario planning for Stockholm as a strategic planning example. In the light of this guidance, it is doubtful that the high-level spatial development options tested to assess strategic land use alternatives for London that gave rise to chapter 1 Good Growth policies fulfil the requirements for 'reasonable alternative options'.

It is relevant to observe that ODPM guidance* (Appendix 6, p69) on developing and assessing alternatives states: “Stakeholders may usefully be involved in the generation and assessment of both strategic and more detailed alternatives through consultation. Demonstrating that there are choices to be made is an effective way of engaging stakeholders in the process.”

User: Just Space

3. The timing of the IIA prevented it from genuinely informing the gradual evolution of the Plan

The Scoping Report was issued in February 2017 by which time many of the key ideas in the new London Plan had already crystallised and become embedded in the embryonic Plan. Many had been embedded in the London Infrastructure Plan 2050 issued in 2014. Discussions were still going on with us in August 2017, by which time the draft Plan must have been nearly finished. It is not credible that the findings of early rounds of IIA analysis could have fed in to formative stages of the London Plan. It could be held to be an exercise in box-ticking.

Close reading of still relevant Government Guidance* and the EU Directive for assessments has generated Just Space analysis that the required and recommended involvement of the public should have occurred at the early formative stages. This is one of the basic requirements for a fair consultation endorsed by the Supreme Court in its Moseley case judgement of 29 Oct 2014**.

The IIA is now at Stage D and no known public consultation has happened at Stages B and C.

The ODPM guidance* on p10 applying EU Directive Article 6.1 & 6.2 explains that the public shall be given an early and effective opportunity…. to express their opinion on the drafts… **at both Stages B and D**. The public were not given this opportunity at Stage B. (See Appendix: Just Space Analysis of Guidance)

It can be concluded that the GLA has not acted according to government guidance and EU Directive transposed into UK law. This would put at risk the plan-making process.

*Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks (ODPM 2005)

** http://www.bailii.org/uk/cases/UKSC/2014/56.html

User: Just Space

4. The handling of the analysis is deficient in crucial respects.

We have not worked through every page in detail but wish to draw attention to key instances where the IIA is seriously deficient:

4.1 **Portrayal of analysis.**

The numerous results are complex compilations, yet are presented in a basic, simplistic form that does not reveal the underlying assumptions and judgements, synergies and cross-cutting or multiplier impacts. The analysis in the IIA Report is too generalised. It writes of environmental and health issues in overly general and vague terms, obscuring the complexities and specific health issues/needs of diverse groups. Samples of the matrices are attached. [See Full Response PDF]

User: Just Space

4.2 Under representation of equalities or health in objectives/guide questions

Guide questions can lack rigour and penetration in the interrogation of policy, e.g. will it reduce poverty and social exclusion… will it manage existing flood risks appropriately and avoid new flood risks… will it help to acknowledge monetary value to natural capital of London?

Assessing policy against 'objectives' which are high level, often "mother and apple pie"; they are segmented, not integrated with consideration of inter-relationships/ interdependencies

The IIA is required to include the preparation of a health inequalities strategy tackling health inequalities. Many of the objectives and guiding questions for each topic do not address each of these such as equalities or health despite the attempt to colour code questions in fig.7.3. In particular, equalities impacts are under-represented in the IIA SR. For the IIA to be of use, all of components of the assessment should be given appropriately adequate weight in order that the objectives and guiding questions are properly devised.

4.1 **Biased evaluation:**

The evaluation of Policy H10 Redeveloping Existing Housing and Estate Regeneration shows no negative impacts, either environmental or in terms of social and equalities impacts. Given the extensive research literature, the London Assembly's recent report on the subject, the representations made at Examinations in Public over many years and the Inspectors' reports, this shows how biased the analysis is. There may be positive outcomes from estate regeneration but nobody could doubt that there are negative ones: disruption to residents' lives, losses of embodied energy in structures demolished, severing of community networks if and when residents are displaced, interruption of education and so on. There is no red, or even yellow, in the matrix.

Furthermore, there is an amount of missing information mainly regarding the Community Impact Assessment, where the grey coloured boxes are not indicated as coding in any part of the document. The details on the process of the affected population allocation are also avoided while the significant positive characterization is being attributed to the Equality Impact Assessment part. There is lack of information also on the type of housing and tenure the displaced residents will be accommodated whereas the impact of the relevant objective (Housing supply, quality, choice and affordability) is assessed as significant positive and major significant positive.

4.2 **Omission of cumulative spatial impact of policy:**

The Small Sites Policy in H1 and H2 is intended to apply across very wide areas of London and could produce radically new forms of densification in areas of mainly fragmented land ownership. Until boroughs have produced the proposed design codes and had them approved and adopted there will be a presumption in favour of small site developments which could have severe and largely unregulated consequences which we discuss in comments on H2. In particular we envisage displacement pressures on private tenants and thus disproportionately on weaker groups in society including some ethnic groups. These issues are simply missing, as far as we can tell. This point are further elaborated in the following detailed analysis of Policy H2 and the IIA.

User: Just Space

4.**3 Failure to properly evaluate Equalities Considerations:**

Small Sites Policy H2: Thus whereas concerns and safeguards regarding negative impacts of regeneration (of estates) and potential loss of affordable housing is guarded against in the Better Homes for Londoners SPG and implied in SD10 through Policy Text 2.10.3, the impact of this proposed major intensification of uses across much of London is not referred to and has not been evaluated at all. Equalities considerations are not present in any discussion of this policy. The IIA notes that it is unknown whether this policy H2 might have negative effects on objectives 1 " To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population", and 2. "To ensure London has socially integrated communities which are strong, resilient and free of prejudice".

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

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

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

User: Just Space

4.4 **Failure to respond to IIA requests and the recording of “Unknown” impacts** n relation to Policy SD8, the London Plan IIA requests that "Details on the provision of green space, cultural participation to support vibrant town centres, and affordability should be considered."

The GLA response stated these are "addressed more specifically elsewhere in the Plan."

In relation to SD9 the IIA requests that "It was recommended that further information be provided on how Town Centre Strategies could support and develop cultural infrastructure, and appropriate access to such opportunities. It was also recommended that further detail is provided in relation to housing development, for example the policy could make reference to affordable, adaptable and accessible provision." The GLA felt that no changes needed to be made, and that "The GLA advised that further information is provided in other policies within the Plan which address cultural uses and housing". Nonetheless, of great concern is that the appraisal notes an "unknown" impact for both these policies in the Equalities Impact Assessment, against the key objective 13, "To safeguard and enhance the Capital’s rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London’s global position." We feel it is unsound that there are concerns raised by the IIA about the safeguarding of key social and community infrastructure in town centres, that no provision is made in relation to this in the relevant policies, and that the impacts of this policy on the foundations of vital and lifetime neighbourhoods in London, especially for poorer communities, are declared to be unknown, when in our view they will be seriously affected by this policy as low value uses are displaced for high value uses and unaffordable housing.

User: Just Space

4.5 Undemanding ‘soft’ scrutiny of Policy

DF1. Delivery of the Plan and Planning Obligations: IIA Review: Policy strengthens the compliance of planning obligations when developing a proposal or acquiring land. It supports viability assessment as an exception and just on specific “by case” basis. If an applicant wishes to make a case of viability testing, robust evidence should be presented identifying clear barriers to deliver. This evidence will be undertaken in line with Mayor’s Affordable Housing and Viability SPG.

IIA Comments: Implementation of this policy, will provide structure and a standard process to planning applications, resulting on clarity and certainty to the applicants; e.g. reduce risk for developers and increase negotiating power for local authorities and communities.

Policy supports housing and transport as key for development, and encourages ‘consideration’ of larger sites as opportunities to develop social infrastructure: health, education, cultural and leisure facilities and affordable workspace.

IIA Recommendations: Change minor wording and consider impact on density when bringing forward brownfield sites and the impact on viability.

GLA Response: “ The viability study that accompanied the Plan clearly showed that the policies within the Plan were viable and policy DF1 was explicit that viability issues should be exceptions to the rule.” (IIA p.303)

So the IIA supports LP view on: Viability Tests as being a hamper to speed up development of local sites.Housing and transport should be a priority on development, leaving social infrastructure second. IIA softly touches on considering early infrastructure as a contribution to a balanced and inclusive development. Yet, does not go further on which type of infrastructure: schools, health care facilities, transport infrastructure?

The IIA eschews any mention on the funding gap. There is no comment either, in reference to the boroughs having the capacity to decide how to deal and weigh the information presented in Viability Assessments. Similarly, it is completely avoided how the community is excluded when boroughs are encouraged to take into account the Levy.

User:	Just Space

4.6.Apparent lack of definite consequences from IIA Generally, there is an apparent lack of definite consequences from the IIA.The IIA process should clearly set out and commit to definite actions that are assured to result in the plan or strategy being amended to minimize negative impacts, optimize positive ones and compensate for losses as it progresses throughout its preparation. If it does not done this adequately and therefore has not done what an impact assessment is required to do,

User: Just Space

Appendix: Proposal for a Community Generated Spatial Option

1. The growth challenges facing London require a new geography and a fresh imagination, underpinned by inclusive growth, fairness and diversity of people, businesses and places, therefore avoiding over-reliance on the Central Activities Zone/Isle of Dogs, high-order Town Centres and on a small number of economic sectors.

2. This new geography for London will be a network of Lifetime Neighbourhoods and Lifetime Suburbs, providing many key amenities and job opportunities locally, thus reducing the need for costly and polluting travel into the Central Activities Zone. Outer London in particular needs lifetime suburbs and a real mixed development strategy Through a new approach to public and community-owned assets driven by social sustainability objectives, social infrastructure and community spaces in all parts of London will be protected, avoiding the previous decimation of community assets in working class and multi-cultural geographic areas. It will be a Blue Green City, placing value on the connection and interaction between London's blue and green assets.

3. The South East region and the other regions of the UK are a spatial context which has to be considered in thinking about the spatial future of London. Inclusive growth, that puts economic fairness, health and well-being and environmental sustainability at the heart of development would require a re-balancing with the rest of the UK economy and involve the Mayor in partnerships and collaborations with other cities and regions. Such negotiations could lead to welcome reductions in London's need to find space for additional homes or jobs.

4. It seeks growth by fostering higher pay, investment and productivity in the 50% of London jobs where real wages have been static or falling. It avoids the extinction of viable enterprises in industrial zones, in high streets and local centres and supports the provision of new workspace suitable for diverse activities and sectors, particularly in the foundational economy. This approach offsets the historic sectoral bias in favour of financial and business services in the centre.

5. To achieve a balanced polycentric development the public transport priorities will be orbital movement plus walking and cycling, with investment directed towards smaller scale infrastructure rather than commuter routes such as Crossrail 2. This connects well with the aim of protecting more workplaces outside the centre and with the Lifetime Neighbourhood and Lifetime Suburbs objectives, increasing accessibility and connectivity locally.

6. All parts of London (central, inner and outer London and the more affluent geographic areas within Boroughs) will contribute in an equitable way to meeting London's housing needs. There will be a high percentage of not-for-profit rented homes everywhere, the cessation of estate renewal on current terms (which entails demolition/eviction and big net losses of existing social rented housing in geographical areas where there is a high concentration of working class and minority ethnic communities) and direct development by GLA and Councils of not-for-profit rented housing on public land as a matter of urgency;

7. A continuous process of engagement will give voice and agency to all Londoners with a geographically dispersed model of hubs instead of all connections and resources being targeted at a central hub. Targeting areas of need will close deprivation gaps by measures that raise the Quality of Life of existing communities rather than through their dispersal/displacement. Programmes will be provided so that areas with a high concentration of working class and minority ethnic communities can access the participation tools that are available, such as community rights under the Localism Act.

User: Just Space

Appendix: Just Space Analysis of Guidance

Involvement of the public at Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope

Just Space comment: Stage A identifies other relevant policies, plans, environmental protection objectives and the current state of the environment – baseline information and environmental problems; develops SEA objectives; and consults on the scope of the assessment.

Fig 1 – The SEA Directive's Requirements on Consultation At Stage A (scoping stage)

• authorities with environmental responsibility, when deciding on the scope and level of detail of the information to be included in the environmental report (Art. 5.4). [p10 ODPM Practical Guide]

But see also para 5.A.2 Responsible Authorities need to consider what information they already have and what more they will need. They may already hold useful information, for example from environmental assessments of previous plans or programmes. It may be useful to consult the public at this stage to seek additional information and initial opinions. [[p26 ODPM Practical Guide]

And Appendix 3

• Other consultees, including representative bodies and members of the public, who often have a wealth of knowledge and understanding of the strategy or plan area, e.g. local conservation groups.

Involvement of the public at Stage B: developing and refining alternatives and assessing effects

Just Space comment: Stage B tests the plan's objectives against the SEA objectives; develops strategic options including reasonable alternatives, predicts/evaluates the effects of the plan and alternatives, considers mitigating and maximising beneficial effects; and proposes monitoring measures.

Fig 1 – The SEA Directive's Requirements on Consultation At Stages B, D

• authorities with environmental responsibility and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2). [p10 ODPM Practical Guide]

Appendix 6 developing and assessing alternatives

“Stakeholders may usefully be involved in the generation and assessment of both strategic and more detailed alternatives through consultation. Demonstrating that there are choices to be made is an effective way of engaging stakeholders in the process. The alternatives considered throughout the process must be documented and reasons given on why they are or are not taken forward.” [p69 ODPM Practical Guide]

Sample Matricies [See Full Response PDF]

User: Lands Improvement Holdings

INTEGRATED IMPACT ASSESSMENT

Whilst it is recognised that the Integrated Impact Assessment (IIA) is an ambitious document, in places it should be made clearer and its scope extended. Without doing this further work, it is not possible to conclude that the draft London Plan is based on a justified evidence base that represents the most appropriate strategy, considered against reasonable alternatives in accordance with NPPF182.

In addition, some of the recommendations included in the IIA have been ignored and should have been reflected in draft policies in the London Plan (see below).

Strategic options

The IIA is not supported by a Green Belt Review. As a result, the reported conclusions on the relative value of the Green Belt are not justified.

Without a comprehensive Green Belt Review (or the option for one through future Local Plans) the IIA adopts too narrow an approach to the opportunity for and benefits of limited Green Belt release in London. Proper consideration of limited Green Belt release as a reasonable alternative should be included in the IIA. Particularly where boundaries have not been reviewed for over 80 years and it is proposed to not meet FOAN for housing.

Policy GG2 (page 43)

IIA Option 4 for Policy GG2 considers “selective” Green Belt release, without defining what selective means or identifying proposed locations.

Even so the IIA states:

“This [Selective Green Belt Release] *would bring a range of local economic benefits, helping to meet local demands and contribute to service and infrastructure provision. The release of land around commuter hubs could help to maximise and enhance strategic public transport infrastructure, underpinning sustainable growth. Green belt release in sustainable locations and areas of high PTAL could encourage inclusive growth, allowing access to the wide range of opportunities London has to offer. Increased public transport would contribute to improvements in air quality by reducing private vehicle use and associated emissions. Similarly, associated traffic noise would also decline and good design can help to ensure the number of people exposed to high levels of noise is in decline. This option also promotes the delivery of employment and housing land which will benefit businesses and residents alike, and could play a role in strengthening the long term competitiveness of London” (Page49).*

Despite the benefits identified above, Option 4 was discounted on environmental grounds. The decision to discount Option 4 was made without reference to any specific sites, a Green Belt Review or Ecological Assessment. Much of the Green Belt surrounding London has been intensely farmed, with low ecological value. New development of intensely farmed sites can deliver biodiversity gains, through creating new habitats. This is the case on all LIH’s sites.

The IIA goes on to state that the release of Green Belt land was also discounted on the basis that:

“This [Green Belt] *land often supports a range of social activities, including community events, sports and leisure uses and other schemes that support health and wellbeing. Although the release of green belt will prioritise low performing areas, this may have some adverse impacts on local communities, heritage assets and associated leisure opportunities. Releasing greenbelt land could also have negative impacts on flooding as it would increase the amount of nonpermeable, tarmac ground and reduce soils and trees to intercept water. Similarly, air quality would also be negatively impacted by reducing the amount of green space and trees available*

In the absence of a Green Belt Review, the consideration of specific sites and other supporting evidence, it is not possible to arrive at the conclusions that all Green Belt release will have negative environmental impacts, result in the loss of social and leisure opportunities, have negative heritage impacts, result in increase in flooding and have adverse air quality impacts.

Policy GG4 (page 61)

The consideration for Policy GG4, delivering the homes Londoners need, does not consider the opportunity for and benefits of providing affordable housing through limited Green Belt release.

Housing

Policy H1 (page 137)

The IIA recommendation states that the Policy H1 should provide further reference to delivering housing to meet a range of needs including affordable. The GLA response states that these issues are covered within policy H5, however this is not the case.

We support the IIA recommendation and it is recommended that Policy H1 is amended to include further references to affordable housing delivery (as outlined in earlier these representations).

Policy H3 (page 141)

Policy H3 seeks to ensure LPAs assess housing delivery against policy targets. The IIA appraisal recommends a more comprehensive monitoring and review process of housing delivery against London-wide targets which we support. However, this was not included in the draft policy.

A more comprehensive monitoring and review process should be incorporated within Policy H3 as per the IIA recommendation and as set out earlier in these representations.

Green Belt

Policy G2 (page 225)

The IIA fails to recognise the inherent conflict between Policy G2 and other policies in the London Plan; for example, not meeting London's full housing needs (Policy H1).

In the absence of a Green Belt Review, Policy G2 is not supported by evidence and is therefore not justified.

The IIA appraisal of Policy G2 is not objective and fails to identify the negative elements of Green Belt protection, including failing to meet housing and affordable housing needs, forcing new development to leapfrog the Green Belt resulting in unsustainable commuting patterns, and increased pressure to develop on urban open spaces and employment sites to meet housing needs.

User:	Buckinghamshire District Councils & Bucks Thames Valley Local Enterprise Parthership

The London Plan should fully close the gap between the number of homes needed and the supply of land to accommodate them by further exploring and exhausting all reasonable options for accommodating housing growth within London. One such option is a comprehensive and fully justified review of the Green Belt within London. (Draft London Plan Policy H1 and Integrated Impact Assessment)

User: Buckinghamshire District Councils & Bucks Thames Valley Local Enterprise Parthership

5. We note the Integrated Impact Assessment (IIA) Consultation Document (November 2017) that accompanies the Draft London Plan includes a number of different strategic options which are compared in terms of their performance against 24 overall objectives relating to the environment, equality and diversity, health and community safety. The preferred strategic options have been chosen based on the IIA. 'Making the best use of land' is one of six themes that the IIA identifies as being important for London. We agree that this should be a key objective of the London Plan.

6. One of the strategic options to deliver this theme is 'Current London Plan and selective Green Belt release' (IIA Option 4 – paragraph 8.2.3). It would involve a continuation of the objectives in the current London Plan with the addition of limited Green Belt release in sustainable locations to accommodate identified housing and employment needs over the Plan period. Any Green Belt releases would be determined through the local plan process and would prioritise previously developed land and poorly performing Green Belt. The appraisal concludes that the option could/would have a range of positive impacts:

'The sustainable release of Green Belt land can bring a range of local economic benefits, helping to meet local demands and contribute to service and infrastructure provision. The release of land around commuter hubs could help to maximise and enhance strategic public transport infrastructure, underpinning sustainable growth. Green Belt release in sustainable locations and areas of high PTAL could encourage inclusive growth …. Increased public transport would contribute to improvements in air quality …. Associated traffic noise would also decline ….

This option also promotes the delivery of employment and housing land which will benefit businesses and residents alike and could play a role in strengthening the long-term competitiveness of London'.

7. The IIA also considers Green Belt release in terms of environmental impacts, namely species and habitats, flooding, air quality, historic environment and geodiversity. With the exception of geodiversity (effects positive/unknown) and historic environment (effects unknown/minor negative), the significance of the environmental effects is assessed as minor negative/unknown. Minor negative effects are likely to be limited to small areas within London or limited to small groups of people. This evidence does not appear to support the IIA recommendation *'that an alternative to Green Belt release is considered due to the **severe** environmental damage it could have'* (our emphasis) or the GLA response to this element of the IIA which rejects selective Green Belt release in order to protect the environmental and social benefits (for example, activities that support health and well-being) of the Green Belt.

8. The IIA itself clearly demonstrates that selective release of Green Belt in London has the potential to deliver sustainable growth. It should therefore be given further consideration as part of the London Plan's preferred 'Sustainable Intensification' option.

User: Historic England

Appendix 2

Historic England's response to the Integrated Impact Assessment (November 2017) for the draft London Plan

General Comments

The Integrated Impact Assessment incorporates Strategic Environmental Assessment (SEA). The purpose of the SEA process is to test the London Plan as a whole, and in its constituent objectives and policies, against defined environmental topics, to identify significant effects. Cultural heritage (including architectural and archaeological heritage) is among the environmental topics that are required to be considered. Historic England's detailed comments on the assessment are set out in the table below.

Our conclusion, having considered the report, is that the IIA does not give sufficient weight to the London's exceptional heritage and that the historic environment is under-represented as a consideration. Although there is good coverage in places, there are gaps which should be addressed to ensure a robust assessment. In addition to our detailed comments, we request consideration of the relevant reports and information, some of it very recent, set out below. These should be used as a resource to interpret and expand the baseline evidence for London's historic environment (p132 onwards) which is, at present, over-reliant on designations, and requires greater content on trends and challenges affecting the historic environment. We hope that these reports will be of assistance in informing judgements in the next iteration of the IIA.

Chapter 4 of the IIA sets out relevant plans, programmes, strategies and objectives.

We note that the plans, programmes and relevant reports that should be drawn on require updating, and their contents used to inform the next iteration of the IIA. We recommend that the following are highlighted and assessed:

At national level, the IIA should take account of the *Heritage Statement 2017*, published in December by the Department for Digital, Culture, Media and Sport. This identifies the economic, social and environmental benefits of the heritage based on research findings. The social benefits of heritage range from increased social cohesion and a greater sense of identity to improved wellbeing. The Heritage Statement makes a clear link to the Government's *25 year Environment Plan*, published in January, in which the historic environment is also well integrated.

Historic Environment Good Practice Advice in Planning Note 3: *The Setting of Heritage Assets* (revised December 2017), and

Historic England Advice Note 4: *Tall Buildings*, December 2015 are both highly relevant to the IIA.

In February 2017 a Joint ICOMOS/ICCROM Mission visited to assess threats to Westminster World Heritage Site. The subsequent report (June 2017) made some clear recommendations for improved management of the World Heritage Site, including a recommendation for a stronger strategic planning framework for London's World Heritage Sites, and stronger strategic leadership. The report (available here) is an important part of the evidence base for the new London Plan, and a key document to integrate into the IIA.

Reports prepared to inform the London Plan:

Historic England has published a number of reports and studies to inform the London Plan process. We would like the IIA to highlight and integrate the following reports, all of which are available here. We are delighted to see that two of these are included in the evidence base for the London Plan on the GLA's website.

1. *Keep it London: Putting heritage at the heart of London's future*, Historic England, December 2016 – identifies key priorities for the next London Plan. These include the need to integrate heritage from the outset, and to bring forward a Heritage Strategy for London

1. *Characterisation of London's Historic Environment*, Land Use Consultants, August 2016 - looks at how the historic environment is being assessed in London and how such data influences planning processes

1. *London's Local Character and Density*, Allies and Morrison, September 2016 - explores the different character types that make London distinctive and the potential for a better policy framework to steer contextually appropriate growth

1. *London Plan Archaeology Topic Paper: Delivering better, faster and focused public benefits,* Historic England/ALGAO, March 2017 – identifies the advantages to building in archaeological assessment from and the earliest stage

1. *Translating Good Growth for the Historic Environment*, Historic England, April 2017 – demonstrates how the historic environment contributes to, and is an inspiration for, Good Growth and provides a selection of case studies
2. *Risky Business? – Investing in Heritage at Risk,* Lichfields, January 2018 – identifies the social, economic and environmental benefits of investing in heritage assets at risk, including in the most deprived wards of London.

Historic England is continuing to work with the Mayor's office to scope the nature of a Heritage Strategy for London, to inform the delivery of the London Plan.

Mayoral Strategies

Historic England has provided responses to the Mayor's draft strategies for Transport, Environment, Housing and Health Inequalities. All of these are available here. Since the strategies are prepared with a view to influencing the content of the London Plan, to assist, we provide a summary below of some of the key points where we requested strengthening, to ensure that the historic environment appropriately reflected.

Draft Transport Strategy:

Historic England considers the historic environment and local character play a positive role in promoting Good Growth and wellbeing, through their contribution to attractive and stimulating public places. An effective way of securing these benefits in a joined-up way is through inclusion in the healthy street indicators. With this is in mind we have recommended that the historic environment is included in the 'healthy street indicators'.

We have recommended that transport led opportunities to "maximise" the delivery of high density development should read "optimise" to better reflect the need to integrate development with local character and take into account the setting of heritage assets.

We have also emphasised the need for any proposed development to be based on a sound understanding of the historic environment and local character. This will ensure that proposals are consistent with national policy by taking 'opportunities to draw on the contribution made by the historic environment to the character of place'.

Draft Environment Strategy:

The draft strategy addresses the natural environment. Our response advocates a broader definition of the environment that encompasses the historic dimension of London's environment. We highlight the need to address the qualitative values of green space, including London's Royal Parks, local parks and garden squares. The relationship between historic parks and buildings is key to the experience of London's landscape and townscape. We note that the designation of London as a National Park City should embrace cultural heritage, to align with the defined remit of other UK National Parks.

We underline the opportunities for adaptation of historic buildings for greater energy efficiency through tailored approaches to heritage interest.

Draft Housing Strategy:

Historic England acknowledges the need to address the current housing crisis in London. We welcome the objectives in the strategy for achieving high quality design in new housing, inclusive development and greater partnership working. We particularly welcome the new emphasis on increasing density through medium-rise, rather than tall, buildings and the Mayor's commitment to Design Review. This change in approach supports good place making and, potentially, strengthened community identity.

Our response promotes ways to integrate consideration of the historic environment in initiatives to bring forward small sites and developments in town centres. We consider that exemplar developments can help lead the way, and draw attention to our report *Translating Good Growth for the Historic Environment.* And we flag the advantage of upfront archaeological assessment in de-risking the planning process.

Draft Health Inequalities Strategy:

The strategy addresses the variation in health outcomes that Londoners experience across the capital. Although the connection between the historic environment and health issues may not be obvious, we note the role that quality in the built and historic environment can play in promoting the vitality of local places to the benefit of local communities. In addition, a number of research projects indicate a positive link between heritage and mental health, for example, through volunteering roles.

Chapter 7 The IIA Framework

We support the IIA objectives and guide questions for the Historic Environment, and note the complementary objectives for Design and Culture, which we also support

User: Historic England

Good Growth Policies

We welcome the concept of Good Growth and note that the policies are linked to sustainable development.

Recommendation

The strategic role of the historic environment in achieving good growth could be clearer – see reference in 7.1.1

Policy GG1

Building Strong and inclusive communities

The preferred option is shown as having no relationship with the historic environment objective (Table 21). This is in contrast to Option 3, the community-led option. Historic England considers good place-making recognises, and builds from, the contribution heritage makes to identity and social cohesion.

Recommendation

We recommend review. Our proposed changes in the consultation response are in line with an inclusive approach to good growth.

User: Historic England

Policy GG2 Making the best use of land

The assessment of the preferred option states that high density developments should ensure heritage assets are protected, and identifies that heritage assets in town centres form an important part of local character. Table 23 records an unknown, potentially negative, impact for the historic environment.

Recommendation

We recommend review. Our proposed strengthening of policy GG2 and text is needed to ensure sufficient consideration of heritage impacts.

User: Historic England

Policy SD1 Opportunity Areas

Historic England recognises that brownfield land can offer opportunities for new typologies and character areas. However, all Opportunity Areas (OAs) contain some heritage significance and this should be assessed as part of positive master planning. Characterisation studies, such as that for Old Oak Common, can provide the basis for integrating locally valued heritage assets.

In some OAs there are significant designated heritage assets within the area, or surrounding it. For example, Kingston old town centre has high significance and is located close to sensitive historic landscapes, and the Great West Corridor is located within an area containing London's most exceptional collection of historic landscapes including the Royal Botanic Gardens, Kew World Heritage Site. In each case, the significance of the heritage assets and their settings will need to be carefully analysed.

We disagree with the appraisal in 9.1.1 and Table 46 showing a potentially positive outcome for the historic environment based on policy SD1

Recommendation

The appraisal in 9.1.1, and Table 46, should be reviewed and amended to reflect the need for assessment of heritage assets and their settings, within and adjoining the OAs.

Our proposed changes should be introduced to resolve this issue.

Opportunity Areas – designation

As a general comment - it would be helpful to see how alternative options for new Opportunity Areas (OAs) were appraised in the IIA. The Plan proposes 6 new OAs.

User: Historic England

Policy D8 Tall buildings

The initial appraisal in 9.2.8 does not, in our view, give sufficient consideration to the potential impacts of tall buildings on the settings of heritage assets. This is surprising given that impact on settings is one issue identified as a potential concern elsewhere in the IIA.

We disagree with the assessment in Table 63 that the potential effects of the policy are neutral for the historic environment.

Recommendation

The appraisal and Table 63 should be reviewed, taking account of our comments on policy D8, and also policies SD1 and SI14.

Historic England Advice Note 4 *'Tall Buildings'* and GPA Note 3 '*The Setting of Heritage Assets'* are relevant here.

User: Historic England

Policy H2 Small sites

The implications of the small sites policy for designated heritage assets, and the conflicts with legislative duties and national policy, are not referred to in the assessment, which is a significant omission.

We disagree with the assessment and Table 70 indicating a neutral impact for the historic environment.

Recommendation

There are significant implications for the historic environment from this policy, which are not identified. Please review the appraisal and table 70, and refer to our proposed amendment.

User: Historic England

Policy G1 Green Infrastructure

The initial appraisal correctly identifies that heritage assets characterise green and open spaces. Indeed, London's major open spaces, the Royal Parks, are designed landscapes and identified on Historic England's national Register of Parks and Gardens of Special Historic Interest, together with other historic landscapes. The historic interest of London's open spaces should, in our view, be recognised in this policy, as part of their multi-functional appeal.

This strong relationship between green space and cultural heritage is made very clearly in the Government's recently published '*Heritage Statement*' and in the '*25 year Environment Plan'*.

Historic England has asked for reference to the historic interest of London's green open space in the Mayor's draft Environment Strategy, which would bring it in line with the above Government statements.

Recommendation

We recommend review to include references to landscape and heritage conservation interest, as suggested in our proposed amendment.

User:	Historic England

SI 10 Aggregates

The initial appraisal and Table 130 should identify the potential impact on archaeological remains from aggregate extraction.

Recommendation

We recommend review and suggest an amendment in accordance with our proposed change.

User:	Historic England

SI 10 Aggregates

The initial appraisal and Table 130 should identify the potential impact on archaeological remains from aggregate extraction.

Recommendation

We recommend review and suggest an amendment in accordance with our proposed change

User:	Historic England

SI 14 Waterways – strategic role

The strategic value of the Thames to how the capital's exceptional heritage assets are experienced is immeasurable. The initial assessment should address this gap in the policy coverage, and make recommendations to strengthen accordingly.

Recommendation

We recommend review and additions to the policy to recognise this strategic value of the Thames.

User: Dr Jessica Ferm

1. **Policy E5** on Strategic Industrial Locations (SIL):

should be much stronger in seeking to retain SIL wherever possible. In previous iterations of the London Plan, and in the 2012 SPG, this was clearer, but now it appears that London boroughs are being encouraged proactively to identify the scope for intensification/co-location etc in defining their SIL boundaries. This opens the door for huge loss of SIL. Some industrial land does need to be protected from residential encroachment, purely for operational purposes. Is this not SIL's role and the purpose of its differentiation from LSIS and non-designated industrial sites? As it is written, the Plan simply reads as all industrial land is potentially up for grabs (which weakens the ambition of nil net loss).

has been tightened to exclude non-industrial uses (including retail, places of worship, leisure and assembly uses), with no assessment on the impact on these other uses. The purpose of the tightening of SIL uses in order to increase capacity for industrial to meet demand moving forward is sound. However, it appears that again the driver for this is accommodating as much new residential as possible. There is no consideration given to the overall crisis of accommodation across London for a variety of non-residential uses, where to date SIL and other industrial land has provided relatively affordable and accessible accommodation. Has this been subject to an equalities impact assessment? (the impact on places of worship serving diverse ethnic and religious groups is likely to be notable).

User:	Legal and General Capital

The IIA fails to recognise the inherent conflict between Policy G2 and other policies in the London Plan; for example, not meeting London's full housing needs (Policy H1).

In the absence of a Green Belt Review, Policy G2 is not supported by evidence and is therefore not justified.
The IIA appraisal of Policy G2 is not objective and fails to identify the negative elements of Green Belt protection, including failing to meet housing and affordable housing needs, forcing new development to leapfrog the Green Belt resulting in unsustainable commuting patterns, and increased pressure to develop on urban open spaces and employment sites to meet housing needs.

User: Police Crime Prevention Initiatives Limited

Supporting Statutory Framework:

The purpose of the ‘London Plan’ and the wider planning system, is to contribute to the achievement of “sustainable development”, which is defined as “meeting the needs of the present without compromising the ability of future generations to meet their own needs”. (Resolution 42/187; United Nations General Assembly.)

a) “Integrated Impact Assessment” (IIA) for the London Plan: February 2017, provides the baseline assessment for the forthcoming ‘London Plan.’
The review of relevant plans, programmes and policies has identified a number of key messages that need to be taken into consideration when developing the London Plan and IIA objectives. “Crime, Safety and Security – the design of the built environment and the mix of activities can significantly impact on fear and actual crime.” (4.2.1)

Figure 5.1: “Crime, Safety and Security” directly impacts upon the following strategic objectives: Sustainability (SA), Equalities (EQIA), Health (HIA) and Community Safety (CSIA).

“The design of the built environment can significantly impact on people’s fear of and actual crime. Suggested IIA objectives should be - to contribute to safety and security and the perceptions of safety”. (5.5.16: Flowchart)
In conclusion, the IIA, identified “Objective 4 - Crime” as a key message and consideration that needs to be addressed in the New London Plan.
b) National Planning Policy Framework - 2012: This national document defines, the “three dimensions to sustainable development as economic, social and environmental, each being mutually dependent upon the other.” (NPPF page 2)
c) Section 7, paragraph 58 requires local authorities to produce ‘Local and Neighbourhood plans’ with a specific aim to “create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion”.
d) Furthermore, in Section 8, paragraph 69 the government has repeated this statement and supplemented it by adding that planning policies and decisions should ensure “safe and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas”.
e) National Planning Policy Guidance: This guidance accompanies National Planning Policy Framework and reiterates that designing out crime and designing in community safety should be central to the planning and delivery of new development. Practitioners are also reminded that the prevention of crime and the enhancement of community safety are matters that a local authority should consider when exercising its planning functions under the Town and Country Planning legislation.
f) Section 17, Crime and Disorder Act -1998: This legislation “requires local authorities to exercise their functions with due regard to their likely effect on crime and disorder, and to do all they reasonably can to prevent crime and disorder”.
g) “Modern Crime Prevention Strategy - March 2016”: Home Office policy document excerpt(s) highlight that,
1 “there is conclusive evidence that crime increases when there are more opportunities to offend, and falls when the number of opportunities isreduced” so “the modern crime prevention strategy – is based on removing opportunities to commit crime”.
2 “Our new approach is based on targeting those six key drivers of crime: Opportunity, Character, Effectiveness of the Criminal Justice System, Profit, Drugs and Alcohol.

The Modern Crime Prevention Strategy refers to ‘opportunity’ as the primary key driver of crime. Secured by Design achieves impressive reductions in crime because the focus is on “removal of opportunity” by proven crime prevention methodology.

3 We are working with the police to maintain the ‘Secured by Design’ brand, which is an important source of advice on how design of, for example, housing estates or shopping precincts can prevent crime and anti-social behaviour.”

In summary, there is a raft of legislation, national policy and guidance that addresses the strategic need to reduce opportunities for crime, anti-social behaviour and terrorism in the built environment.
Crime is an ongoing issue in the city and has a direct impact on all three dimensions of sustainability. The effective mitigation of crime, anti-social behaviour and terrorism throughout the planning process, will enhance sustainability by positively impacting on people's health and well-being, as well as the places they visit, work and live.

Independent, academic, evidence-based research, shows that Secured by Design has a huge impact on the alleviation of opportunity and ongoing reductions in crime. The planning system has a crucial part to play to support this and in turn, fulfil its role to 'achieve sustainable development' in London.
SBD urge you to reassess and include Secured by Design and Designing out Crime as a spatial planning strategic policy.

User: Mr Daniel Willis

Retail gentrification and the Night-Time Economy

We commend the Mayor's efforts to foster a more equal, polycentric, diversified economy which delivers opportunities for all of London's communities. Community Links welcomes the Mayor's reference to digital connectivity as a crucial component of London's future. In fact, we are developing a Digital Hub which will provide digital skills and employability training to the local community. We are pleased to see that the proposed Plan aims to prevent loss of "essential convenience and specialist shopping" units and that local identity will be a factor in planning decisions regarding economic activity. In principle, this suggests that the new Plan will support the entrepreneurship of Newham's diverse communities and protect the numerous cafés, supermarkets and retail outlets which support BAME communities (including East London's growing Eastern European and Latinx populations).

However, on this point there again appears to be a contradiction between the Mayor's attempt to create a more welcoming, inclusive and equal London and the intention to embark on widespread intensification projects. As Hubbard has argued, in regeneration and gentrification processes it is often corner cafés, "convenience 'ethnic' grocery stores" and pubs which are among the first to be replaced. As well as contradicting the Mayor's emphasis on developing a more diverse and entrepreneurial economy, this process would have a detrimental effect on community cohesion as these independent retail units play a crucial role in supporting ethnically diverse and less affluent communities. The Equality Act 2010 states that public bodies should consider inequalities caused by socio-economic disadvantage when making strategic decisions, but we fear that the new Plan risks exacerbating existing inequalities by favouring retail gentrification. In order to avoid this, we believe that the London Plan must include steps that enable the genuine participation of communities, business owners and employees in re-shaping their local retail environment.

Community Links therefore supports calls from Just Space for: the Mayor to implement the Equality Act's socio-economic duty in all decision-making processes related to economic activity; and for the Plan to include a commitment to ensure the representation of diverse industrial sectors, including businesses owned by ethnic minorities and migrants, on GLA decision-making boards. We also call upon the Mayor to include a specific clause in the new London Plan which recognises the role played by diverse, independent retail units in London's economy and their importance for creating a welcoming, inclusive and vibrant atmosphere for everyone. Furthermore, we call on the Mayor to ensure the protection of these units in future planning decisions by drawing up a register of SMEs, businesses and commercial spaces across London that play a crucial role in the economic, social and cultural life of the local community.

User:	Legal and General Capital

Integrated Impact Assessment

Whilst it is recognised that the Integrated Impact Assessment (IIA) is an ambitious document, in places it should be made clearer and its scope extended. Without doing this further work, it is not possible to conclude that the draft London Plan is based on a justified evidence base that represents the most appropriate strategy, considered against reasonable alternatives in accordance with NPPF182.

In addition, some of the recommendations included in the IIA have been ignored and should have been reflected in draft policies in the London Plan (see below).

User:	Inclusion London

Policy M1 Monitoring

Recommendation: There is a detailed Equality Impact Assessment to ensure the impact of the London plan on Deaf and Disabled people can be seen clearly.

User: Environment Agency

It is our firm view that land quality and remediation of contamination is a missing policy area within the draft Plan. The current London Plan addresses land contamination (Policy 5.21). The draft London Plan is an opportunity to improve upon that policy, and clarify expectations for a strategic approach to tackling contamination, particularly given the proposed ‘clustering’ of Opportunity Areas for growth.

Many of the Mayor’s Opportunity Areas (and major growth locations), rely heavily on the development of brownfield land, some of which is contaminated, impacting on water bodies, groundwater, and potentially surface water.

The draft Plan’s Integrated Impact Assessment (IIA) addresses Geology and Soils. At IIA, Section 5.20, p.24 Geology and Soils, there is recognition that some areas in London have high levels of contamination, and that this is particularly an issue for some of London’s larger brownfield sites which require development.

At IIA, page 28, a key issue is ‘Remediation of contaminated land’. We agree. At IIA, page 33, we note that relevant assessment questions include: restoration of degraded soil? and ‘ minimise the risk of health impacts through contamination’.

There was discussion in the IIA Scoping Report around the opportunities to focus on prevention and remediation of soil and contamination, and to adopt a co-ordinated approach to bring derelict land, with high abnormal costs, back into use (IIA Scoping Report, Section 5.22, p.137 on). However this discussion does not appear to have been followed through in the IIA itself.

The benefits of dealing with contamination strategically are evident in the London Legacy site’s development. A Global Remediation Strategy (GRS) was developed and implemented for the regeneration of the 250ha Olympic Park. The GRS established the framework by which Site Specific Remediation Strategies (SSRS) were determined for each Olympic Park construction zone. Implementing this framework enabled sustainable soil and groundwater remediation techniques to be planned and delivered, and enabled more than 90 % of one million cubic metres of contaminated soil to be cleaned and reused on site.

Brownfield land within major growth locations may have a combination of problems, including contamination that can be addressed more economically and sustainably with a strategic approach. GRS for large multiple development sites can help strategically address land contamination issues at the planning stage and help deliver sustainable results on a strategic scale.

Remediating contamination, and consequently improving soil and groundwater quality would aid the delivery of Plan objectives for improving health, greening London, supporting biodiversity gain, and would contribute to the feasibility of sustainable drainage systems in locations where it otherwise would be unfeasible.

We draw attention to the Old Oak and Park Royal Mayoral Development Corporation's revised Local Plan 2017, Policy EU13 which promotes a strategic approach in supporting development which effectively tackles contamination across the 3 boroughs which comprise the Old Oak and Park Royal Opportunity Areas.

Consequently, we consider that the draft Plan must take the lead in promoting a strategic approach to tackling soil contamination and remediation, and contributing to the prevention of contamination to water bodies, groundwater and surface water, based on current best practise and guidance. We would expect revisions to the IIA to address the key issues and questions it correctly raises.

Recommendation:

We strongly recommend that the new Plan includes a policy and text on land contamination and remediation. The Plan should identify and promote a strategic approach for London, and for development plans and proposals to follow in tackling contamination, particularly given its focus on brownfield locations for accommodating major new growth.

This would contribute to bringing brownfield land back into beneficial use, and ensure that the development of brownfield land results in the reduction of significant harm to human health and the environment.

We are happy to advise further on policy wording and approach as required.

User: London Borough of Hackney

In the current London Plan contaminated land is dealt with under Chapter five. We are concerned that the draft London Plan does not address contaminated land and soil protection in London and would request that these issues are included.

We would request that the Mayor includes contaminated land within the London Plan and in particular:

1. Sets out clear policies for contaminated land and soil protection;
2. Identifies COCs that are commonly present in soils and made ground across London and that may occasionally be present at levels that could result in harm;
3. Develops less conservative suitability for use criteria for London to ensure investigation and remedial works (whether under planning system, Part 2A of the Environmental Protection Act 1990 or Environmental Damage Regs) are only undertaken where necessary but remain protective of the health without degrading the environment.

Current approaches to addressing contaminated land through the planning system are fragmented across London with an array of approaches being taken. This has resulted in a significant lack of consistency in approaches to addressing contaminated land issues across the Capital. We would urge the Mayor to take action to better coordinate how contaminated land and soil protection is addressed across London through the London Plan.

User: Dylon2 & Relta Ltd

The scale of likely underestimate of the true level of housing need is further highlighted when the proposed target of c.65,000 is compared against the proposed Standard Method for assessing housing needs set out in the Government's 'Planning for the right homes in the right places' consultation. If applied to London, the proposed standard methodology identifies needs as c.72,400 dwellings per annum, once the method's proposed capping mechanism is applied - this caps uplifts to 40% above either up-to-date local plans or household projections. Without any capping the need for homes in London would rise to c.95,000 dwellings per annum. Despite the draft target not meeting assessed housing needs, limited justification is given for why the proposed targets is appropriate at c.65,000 dwellings per annum, beyond simply that they are the product of a capacity-based exercise and reflect what the GLA anticipates might be achievable within the confines of the capacity assessment that has been undertaken (see Section 3.0 below) . Indeed, there is no balancing exercise of the type envisaged by paragraph 14 of the NPPF: to meet housing needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. The absence of this key consideration is perhaps best highlighted by the draft new London Plan's accompanying Integrated Impact Assessment (IIA). The IIA does not appear to assess any alternative housing targets; even the strategic policy options around 'delivering the homes Londoners need' each focus on what type of housing is delivered and how, rather than overall amounts . Furthermore, the IIA's assessment of Policy H1 -a policy which does not seek to meet identified housing needs on the GLA's own evidence- appraises the policy as having long term 'Significant Positive' (++) effects (the most positive rating) against a housing objective of meeting housing need. Dylon2 Ltd and Relta Ltd's broad support for the overall ambition is, therefore, qualified with the concern that collectively, these shortcomings could add up to the new London Plan continuing not to effectively address the housing problem across London, nor ensuring delivery of the homes where they are needed within individual boroughs.

User:	Natural England

Appendix 2 – Natural England's comments on the Integrated Impact Assessment (IIA)

Natural England supports the inclusion of Objective 20, which is 'to protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides'. However, we note that a number of policies which would clearly affect the viability of this objective have been marked as 'n/a'. In particular, the effects of policies SD1 and H1 have been marked as 'n/a' in this respect. We suggest that the assessment is reviewed with regards to our comments on these policies above.

User:	Kennington Oval and Vauxhall Forum (KOVF)

We do not think the IIA process has been adequately conducted, being deficient in public consultation at the crucial options stage, leaving only officially sanctioned options to be appraised and subsequently consulted on. This is inconsistent with UK guidelines laid down by the courts for sound consultation. Furthermore, we do not consider the IIA has adequately met the requirement of Regulation 12(2)(b) and Schedule 2 para 8 of the Environment Assessment Regulations (SI 2004 No 1633) to outline the reasons for selecting the alternatives dealt with, and evaluate their effects on the environment. We have in mind particularly the population growth assumptions embodied in the SHMA, referred to below, which has major implications for the housing targets and their environmental impact.

User:	Stonewall Housing

INTEGRATED IMPACT ASSESSMENT:

Stonewall Housing welcomes the comments made in the complementary impact assessment about ensuring the feeling of safety of LGBT people and the need for LGBT cultural activities through the delivery of the London Plan. However, as mentioned above, failure to address LGBT people's housing aspirations and the need for non-commercial community spaces will mean that our communities will continue to be negatively impacted by the delivery of another London Plan.

User:	London Borough of Hillingdon

The Impact Assessment for Policy H2 does not recognise that there is an impact in flood risk terms and marks it as not applicable. However if a significant driver within the London Plan is to secure long term sustainable and appropriately designed housing, which encourages future green infrastructure to mitigate impacts. Encouraging smaller sites will not achieve this as these are below thresholds for current constraints on development to be considered.

Introducing the Plan

User: Mr Chris Rose

The while document is based on the false premise that never-ending 'growth' is inevitable, desirable and 'sustainable'. And it does mean never-ending because there there is no suggestion of any limit or that there ought to be any end point in this document. We see, for example, that the housing figures are likely to be jacked up again in 2029.

Bexley's figure has already been hiked from 4,500 to 22,000 to 31,000 by c2026 in a matter of 5 years since the original target was agreed (after public consultation). It is now bulldozing ahead with a 'growth strategy' encompassing these figures that 85% of people have rejected in another of its fake money-wasting 'con'sultations.

'Good growth' is a fig leaf for lack of human self-control and will still result in a net increase in resource consumption which is unsustainable.

0.0.6 refers to international treaty obligations, yet there is no reference to the UK's Aichi treaty commitment to get resource consumption down to sustainable levels by 2020. It is reckoned that the UK is living a 3 planet lifestyle, so that requires a 66% cut. Or is that someone else's responsibility and nothing to do with London? New Scientist published a graphic a few years ago showing that London's resource footprint required the whole of the UK's materials, so I suggest London has to take a very large chunk of the UK's responsibility in this.

It is depressing that this plan unquestioningly accepts what came before with Boris Johnson - a massive population increase and the whole 'city of the east' concept, already undermining the green character of my Borough.

I note there is no mention of a future for other species in the capital in the foreword, which rather sums the importance this matter is afforded.

User: Countryside Properties PLC

National Planning Policy

We understand that the Government are due to consult on proposed amendments to the National Planning Policy Framework (NPPF) in spring 2018, with a view to publishing the final version of the NPPF in summer 2018.

The Draft London Plan will need to be reviewed to ensure consistency with the NPPF prior to the Examination in Public on the London Plan which is currently scheduled for autumn 2018. We note that the Draft London Plan states that *'on some occasions, the Plan deviates from existing national policy and guidance; this is mainly where the Plan is delivering on a specific Mayoral commitment and reflects the particular circumstances of London'* (paragraph 0.0.20).

If the London Plan is to adopt this approach then it must be explicit where such deviations exist (i.e. not utilising the Government's Standardised Methodology for calculating Objectively Assessed Housing Need) As the Mayor is aware, for the London Plan to be found sound at examination it must be *'consistent with national policy'*.

User: London Borough of Camden

This states that "*As the London Plan is part of every borough's development plan, there is no requirement for the policies to be repeated at the local level before they can be implemented. However, in some instances a local approach is required within the context of the overall policy. The Plan clearly sets out where this is the case*."

A London-wide policy will not reflect the differing character and contexts of the boroughs and therefore it remains appropriate for boroughs to prepare their own policies for matters covered in the London Plan to reflect local circumstances. We therefore request that the London Plan makes it clear that boroughs can bring forward policies in their local plans to achieve the aims of the London Plan in a way that takes into account local circumstances and evidence, where they consider it appropriate to do so.

This is consistent with the requirement for borough plans to be in "general conformity" with the London Plan, rather than accord with every aspect of it. The Town and Country Planning Act 1990 (as amended) indicates that a London borough's local plan shall be in "general conformity" with the spatial development strategy. The Greater London Authority Act 1999 (s334) indicates that the "The spatial development strategy must deal only with matters which are of strategic importance to Greater London".

As worded, paragraph 0.0.21 suggests that it is the role of the London Plan to set out where boroughs should provide local policies and implies that unless explicitly stated in the London Plan boroughs should not bring forward local policies on a particular matter. However, it necessarily will be boroughs, rather than the GLA, who know when their local circumstances justify a specific policy response in their local plan. Paragraph 0.0.21 should be amended to reflect this. It is important that the wording of the London Plan does not prevent boroughs like Camden bringing forward progressive policy responses to local circumstances in future.

The Plan should also explicitly recognise that it is reasonable and appropriate for boroughs to take a locally specific policy approach that diverges from the London Plan approach where this is merited by exceptional circumstance, supported by robust evidence; in the same way that it local plan policies can diverge from national policy where warranted. This is consistent with the legal fact that the application of policy must allow for the possibility of justified exceptions. (E.g. as recognised in the Court of Appeal's judgement on the case of the Secretary of State v. West Berkshire District Council and Reading Borough Council C1/2015/2559: [2016] EWCA Civ 441.)

The London Plan should also include a clear statement that policies in the new London Plan do not necessarily supersede or render out of date detailed borough policies where these are based on local circumstances and up to date evidence and are consistent with the objectives of the London Plan. Without such statement, the adoption of the London Plan will leading to a reduction in the ability of boroughs to implement more detailed or locally specific policies that contribute towards delivering the policy objectives of the Mayor.

User:	Ruth Blair

The document states that Mayor accepts that the draft plan does not comply with National Policy, but that he believes the “scale of his victory” is sufficient for him to ignore that the Greater London Authority Act 1999 and The National Planning Policy Framework of 2012. Legislation requires the London Plan to be consistent with national policy and guidance.

User: Redrow Homes London Division.

This paragraph states that the Plan ‘sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years’.

The London Plan should firstly be clear that it sets planning policy up to 2041 but secondly that it only includes a 10-year housing target. With respect to the latter it should be clear about:

? what the GLA will do in terms of a housing delivery review (including updating targets) beyond 2028/29; and
? how the London boroughs should address housing targets in their local plans that extend beyond 2028/29.

User: Redrow Homes London Division.

This paragraph acknowledges that ‘the legislation stipulates that the London Plan should only deal with things of strategic importance to Greater London’.

The London Plan must undergo a fundamental review for it to be compliant with legislation.

As examples, we do not consider that ‘policies addressing tangible matters such as basement development (Policy D9) or the provision of public toilets (Policy S6) can truly be described as being of ‘strategic importance to London’’. These policies should therefore be deleted.

User: Redrow Homes London Division.

The Draft Plan states that ‘on some occasions, the Plan deviates from existing national policy and guidance’.

If the London Plan is to adopt this approach then it must be explicit where such deviations exist and justify these through evidence.

For example, the draft London Plan’s policy approach towards heritage assets deviates from national planning policy but it is not clear whether the Mayor acknowledges this.

User: Redrow Homes London Division.

The Draft Plan effectively suggests that the London Plan should be the primary planning document against which planning applications in London are determined whilst Boroughs ‘spend time and resources on those issues that have a distinctly local dimension and on measures that will help deliver the growth London needs’.

We anticipate London’s boroughs will be robustly challenging the interpretation of the relevant planning legislation and guidance on which this position rests.

If the London Plan is to maintain this position then this must be justified and an explanation as to how this will be monitored.

User: Sean Creighton

Mayor's Introduction

2. In his introduction the Mayor states that London faces 'another wave of growth, the likes of which we've not seen for a century. Our population is projected to increase by 70,000 every year, reaching 10.5 million in 2041. This means that just to meet demand, at least 66,000 new homes need to be built – along with space for tens of thousands of new jobs – every single year.' (page xiv)

3. I reject this acceptance that London should grow. The Mayor should be actively seeking to slow the growth of London because:

(1) it is at the expense of other parts of the Country, sucking resources and people and over intensifying the capital and its region;

(2) over development and over intensification of its inner city areas;

(3) the uncontrollable nature of buy-to-let landlordism which distorts the housing market, and aggravates living conditions;

(4) developers are not meeting the real needs of existing Londoners;

(5) the increasing stress on infrastructure, for which there is already not enough funding;

(6) the increases in the stresses on the working and residential lives of Londoners;

(7) the threats to green spaces

(8) the over stretching of energy and water resources.

User: Mr Drew Stevenson

A. Vision: the Foreword (end of page xv and on page xvi) sets out the Mayor's vision for London with nine elements:

- an economy that supports more and better paid jobs
- where people spend less time commuting because we have so many thriving parts of London
- good affordable housing
- exciting, cutting edge career opportunities
- access to great culture across London
- a boom in safe, easy active travel
- a greener city
- leading the way in tackling climate change (a zero-carbon city by 2050)
- with clean air
- a pioneering smart city with world-class connectivity.

However, within the Plan itself, as opposed to the Foreword, there is no Vision set out. The nearest we get is a statement (Para 1.0.4 on page 10 with reference to Good Growth policies) which says that "taken together, these policies provide a vision for how London should sustainably grow and develop in the future." But Para 0.0.29 confuses things by saying that "These (Good Growth) policies represent the overarching objectives of the Plan."

We therefore have a vision which stems from policies (or are they objectives?), rather than the other way round; policies should flow from the Mayor's vision. There is also little justification for these Good Growth policies. Instead they tend to be stated as desirable - leading to a passive and incremental approach to change as a result of planning applications, rather than a determined and vision-led approach to change.

One of the defining characteristics of the Mayoral term so far has been his commitment to A City for All Londoners and the implications for creating a more equal society in London. This clearly has the support of countless thousands of Londoners, and **I invite the inspector** to examine how the London Plan can play its full role in delivering this.

I think that the vision as currently drafted does not wholly reflect the aspirations of A City for All Londoners. Consequently:

*****I suggest that** the Mayor's commitment to a more equal society, his determination to tackle injustices and to the active involvement of communities in the spatial development of their areas are more clearly expressed as cornerstones of that vision in the Plan.

User: Mr Drew Stevenson

B. Challenges: The draft Plan lists two slightly different sets of challenges facing London.

The Foreword to the DLP identifies 5 challenges (third para on page xiv):

- the level of growth
- the uncertainty caused by Brexit
- air pollution
- climate change
- entrenched inequality.

Chapter 1 however identifies 6 challenges (para 0.0.25 on page 6):

- the pressure from a fast-growing population
- the increasing diversity of Londoners
- rising inequality
- the changing nature of the economy
- the uncertainty caused by the EU referendum result
- the effects of climate change.

These discrepancies need to be resolved; there also needs to be a clearer link between the vision (which should address the challenges), and the policies that deliver the vision.

***I suggest that** some minor changes are made to the current draft in order to identify more clearly:

- *the challenges* that London faces (rationalising the 2 sets above),
- *a statement of intent* to address the spatial implications of those challenges through the London Plan
- *a vision* to do that (based on the vision set out in the Foreword, pages xv and xvi, modified as suggested above - also to include a reference to improving health). This must be included in the main body of the Plan, not just the Foreword.
- *the policies*, which deliver the vision via the unifying theme of Good Growth.

User: Mr Drew Stevenson

A. Consultation/Participation. Whilst **I welcome the opportunity to comment on the draft,** I am concerned at the comparatively light commitment in the document to the ongoing participation of local communities, via development frameworks etc.

Local people and the voluntary and community sector as a whole have enormous untapped depths of local knowledge, of local issues and of imaginative and practical solutions that the Plan is in danger of over-looking. Local communities are not the problem (as so often portrayed by some), they are a core component of the *solution* to local issues and their involvement in framing local planning documents can make the difference between success and disaster.

User: Mill Hill Neighbourhood Forum

When we set out to complete our Neighbourhood Development Plan we were encouraged that it could make a real difference locally and we certainly did not set out to be NIMBY, far from it; we set out to get the right distinctive developments that would enhance Mill Hill as an attractive place to live, work and play, along with the right infrastructure to support our residents. With now around 21950 residents in Mill Hill ward (an increase of 19% since 2011) and an expected population of 25900 in 2028 (an increase of 55% since 2006) of which 30% are likely to be over 60, we are a different suburb from many you may be most familiar with. People live in Mill Hill because it has mainly low-rise family homes (many built in the 1930s and still very attractive and well maintained) with small gardens and the area is ideally suited to the development of families in a multi-cultural, safe environment.

We are disturbed that the DLP does not really acknowledge Neighbourhood Planning as the third tier (or is it the 4th with NPPF) in the Planning system as set out in the Localism act of 2011. Neighbourhood planning is now well established in the capital and warrants much more recognition for its role in helping deliver the London Plan's objectives than a few passing references in the draft. Therefore, the London Plan is unsound in failing to conform with the National Planning Policy Framework on the role and importance of neighbourhood plans. Indeed, the Plan's objectives for "good growth" depend on effective and early community engagement in development choices. The challenging objectives that the DLP suggests to increase housing numbers and develop more small sites will depend on securing community consent through neighbourhood planning and very effective engagement and this will rely on local knowledge applied through neighbourhood plans which are already identifying many appropriate development sites and bringing forward development better and faster than many Local Plans.

We believe that stronger, better and earlier design input is critical to the successful delivery of the London Plan and neighbourhood planning can provide this, including design codes and character assessments at the very local level. The London Plan needs to be clear which are the strategic policies with which neighbourhood plans have to be in general conformity and it should not stifle local grass-roots opinion that will usually be much more effective in shaping places than a hand from on high.

User:	Oneill Homer
Even though they are not obligatory, Neighbourhood plans should be specifically identified as important parts of the plan making and development management system in London. They are very conspicuous in their absence from this paragraph.	

User:	Oneill Homer
Neighbourhood plans should be acknowledged as the third tier of plan making in London, again, irrespective of their non-obligatory status.	

User: Eastcote Residents' Association

The viability of the enactment of the Plan across London
Throughout the document it appears there has been no clear and sufficient distinction made to accommodate the very different issues and needs between those of Inner and Outer London Boroughs.
Equally, all Boroughs have a legal obligation to use the London Plan policies to determine their local planning policies (0.0.09 refers)
- Thus the included large number of prescriptive policies will have to be enacted in local policy irrespective of whether they actually provide 'good growth' within a Borough and/or the areas within it. In many cases local policies can be applied directly from the Plan without the need for local input. This combination effectively takes away leeway for a Council to make its own determinations to provide truly locally based plans addressing local issues.
- 'A one policy fits all' approach for Inner and Outer London is unlikely to be viable, within these areas, and to meet the overall requirements of the plan and its detailed remit.

User: Unknown

“On some occasions, the Plan deviates from existing national policy and guidance; this is mainly where the Plan is delivering on a specific Mayoral commitment and reflects the particular circumstances of London. The scale of the Mayor’s election victory provides a significant political mandate to use the planning system to deliver his manifesto commitments”.

The acknowledgement that the plan deviates away from national government policy and guidance on the basis of a political mandate is not supported.
The Mayor has identified some ambitious targets for London over the coming years, and the GLA and mayoral team will be critical in ensuring these aspirations are achieved. Many local authorities are suffering from budget cuts and under resourcing, and whilst localised planning and decision making are important to ensure accountability the Mayor must provide stronger policies on these key strategic issues to give him the tools to lead the growth agenda.

User: Taylor Wimpey UK

The Mayor States that whilst the London Plan runs from 2019 to 2014, some of the more detailed elements of the Plan, such as the housing targets are set only for the first ten years of the Plan and will be reviewed before 2029.

As a starting point, the OAN assessment should reflect the baseline period of coverage 2019 to 2029 rather than a starting point of 2016 through to 2041.

Clarity is also required on how the housing targets will operate after this date and the relationship with the 35 London Boroughs whose plans and SPD's will be prepared to take account of this target.

The London Plan carries national significance in terms of its contribution towards the UKs economic prosperity and housing supply. Failure to deliver the proposed annual housing target would have major implications for the de livery of much needed homes in the capital.

The Plan shou ld therefore introduce a review mechanism- w he re a review of its housing policies and those policies t hat impact upon the delivery of housing including spatial and design related policies would be triggered if the annual housing targets are not achieved. There should also be a review of the Affordable Housing SPD (2017) which directly affects the delivery of homes within London.

Guidance should be provided regarding the planning weight to be given to Local Plans that have recently been adopted in the context of the London Plan 2016.

User: Taylor Wimpey UK

We do not agree that delivering on a specific mayoral commitment and particular circumstances of London provides sufficient justification to deviate from NPPF and established practice.

Whilst the London Plan is not a Local Plan, it operates as such in terms of establishing strategic spatial policies that will inform the preparation of the 35 London Borough Plan's.

We strongly object to the following departures from NPPF:

- Approach to assessment of Objectively Assessed Housing Need and Supply;
- Direction that London LPAs do not need to prepare Part 1Plans;
- Approach to Green Belt; and
- Recasting of the Use Classes Order .

The potential impact of these departures represents a fundamental risk in terms of

- Failure to plan to meet the needs for market and affordable housing in the housing market areas;
- Failure to deliver a wide choice of homes in terms of mix, type, tenure and range that is required in particular locations, reflecting local demand; and
- Restricting the ability of Councils to plan for growth that may include a review of Green Belt Boundaries in exceptiona l circumstances in line with NPPF.

User: Taylor Wimpey UK

Clarification is sought whether Local Planning Authorities will be required to undertake Objectively Assessed Needs as part of their local plan preparation or whether this figure will be set by the London Plan.

The paragraphs indicate that, given the London Plan is part of every borough's development plan, there is no requirement for the policies to be repeated at the local level before they can be implemented. This will allow Boroughs to spend more time on measures that will help deliver the growth London needs.

This suggests that the London Plan Policies will take immediate effect and relevant housing policies with in adopted plans will be out of date where they fail to demonstrate a five-year supply of deliverable housing sites.

Of particular concern is the ability of London LPAs to accommodate the London Plan targets given the lack of any robust independent assessment of both OAN and supply of deliverable sites.

There will also inevitably be a delay following adoption of the London Pan as London LPAs seek to allocate sufficient sites via Local Plans, Site Allocations DPDs or similar.

This raises further concerns over the London Plan and the ability of the Mayor and London Boroughs to deliver their annual housing targets.

User: Taylor Wimpey UK

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This raises further concerns over the London Plan and the ability of the Mayor and London Boroughs to deliver their annual housing targets.

User: Aitch Group

Deviating from National Planning Policy - The London Plan is explicit that ‘on some occasions, the Plan deviates from existing national policy and guidance; this is mainly where the Plan is delivering on a specific Mayoral commitment and reflects the particular circumstances of London’ (paragraph 0.0.20).

If the London Plan is to adopt this approach, then it must be explicit where such deviations exist. For example, the fact that the GLA have not used the Government’s standardised methodology for calculating objectively assessed housing need and fails to take account of Paragraph 22 of the NPPF, which seeks to avoid the long-term protection of employment sites where there is no reasonable prospect of the land being used for that purpose.

As the Mayor is aware, for the London Plan to be found sound at examination it must be ‘consistent with national policy’. Deviations therefore risk the London Plan being found unsound and rejected at examination.

User: Roxhill Developments Ltd

Introducing the Plan

Roxhill wishes to object to the approach set out in paragraph 0.0.20 of the draft London Plan. This paragraph seeks to justify that elements of the Plan can be inconsistent with national policy, mainly where theye relates to a specific mayoral commitment. The draft London Plan should be consistent with national policy and guidance. Roxhill's primary concern is where this relates to green belt policy (discussed later in this letter).

0.0.20. The policies in the Plan have been developed over a number of months and are supported by a proportionate evidence base. In their development, the Mayor has had regard to the need to ensure consistency with national policies, but does not seek to repeat them. Instead the London Plan seeks to develop an approach tailored for London, and act as the key document shaping planning decisions across the capital. ~~*On some occasions, the Plan deviates from existing national policy*~~ and ~~*guidance;*~~ ~~this is mainly where~~ ~~*the Plan is delivering on a specific Mayoral commitment and*~~ ~~reflects the particular circumstances of London. The scale of the Mayor's election victory provides a significant political mandate to use the planning system to deliver his manifesto commitments.~~

[note: while paragraph 0.0.20 should be altered in the manner set out above, the key point is that the policies throughout the draft London Plan should be consistent with national policy and guidance and be supported by a robust evidence base].

Lichfields' Commentary

The Mayor of London has to produce a spatial development strategy, under the Greater London Authority Act (1999) (as amended) ("the GLA Act"). Section 41 of the GLA Act makes clear that in preparing or revising the spatial development strategy for London (i.e. iterations of the London Plan), the Mayor *"shall have regard to[...] the need to ensure that the strategy is consistent with national policies".* These national policies are primarily included in the National Planning Policy Framework ("NPPF"), but for certain infrastructure projects these can include the relevant National Policy Statement ("NPS"). Section 337 of the GLA Act is clear that inconsistency with current national policy is sufficient justification for the Secretary of State to direct the Mayor not to publish a spatial development strategy (i.e. an iteration of the London Plan), unless these inconsistencies are addressed.

There is in effect a statutory requirement therefore for iterations of the London Plan to be consistent with national policy. This requirement is reflected at paragraph 2.5 of the GLA document *'London Planning Statement Supplementary Planning Guidance'* (2014) ("LPS SPG"). It is also recognised in the current London Plan (2016), which directly references *"the need to ensure consistency with national policies"* (paragraph 0.5).

User:	Unknown

Paragraph 0.0.20 of the DLP claims that the plan has been developed over a number of months and supported by a proportionate evidence base. On the one hand, this paragraph also confirms the DLP has considered national policies, but later confirms that on occasion some policies depart from the NPPF. CBRE have identified examples of this and would question the legality of such an arbitrary approach. We do not consider that the policies we have referred to above have been backed up by sufficient evidence which in turn leads to demonstrable tension between policies.

User: Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living

A Strategic Plan

The Mayor sets out at paragraph 0.0.20 that the DLP deviates from current national planning policy in a number of respects. The Mayor asserts his local political mandate to further justify these departures. There are instances in the DLP where the deviation from national policy is significant and has much wider consequences for other areas of the country. While the desired outcomes of the DLP are largely understood, deviation from national policies and particularly housing policies to such an extent as proposed in the DLP is problematic for many reasons. The NPPF sets the foundations for establishing planning policies for housing across the country and to an extent provides certainty for the industry to enable investment and growth. The more detailed HBF representations in this respect are supported.

Furthermore, the purpose of the London Plan, or similar document, is set out within Part VIII of the Greater London Authority Act 1999 (Section 334). It is clear that the purpose of the London Plan is to provide an overarching strategic plan, not to impose top down targets, or to provide prescriptive policy, which should be at the auspice of the relevant local authority.

The DLP should only deal with matters of strategic importance to Greater London and as such the prescript detail contained within proposed policies within the DLP is not appropriate in many cases.

The DLP goes significantly beyond its function as a strategic document; the level of detail currently in the policy is more akin to a core strategy or local plan document. In our view, policies are overly detailed and too prescriptive for a strategic document causing the DLP to overstep its remit. Paragraph 182 of the NPPF details the criteria by which the policies of a local plan are assessed in order to be considered to be “sound”. While the soundness tests as set out by the NPPF are not benchmarks by which the London Plan in its position as legislation supported by the GLA Act 1999 (as amended), we believe these are nationally accepted ‘yardsticks’ which provide important guidance to plan-makers. We believe the lack of clarity in the role of the London Plan is such that the policies have not been evidenced to the extent where they can be considered sound, and indeed we consider that a number of policies contradict and conflict with each other.

An example would be the proposed policies in relation to older people’s housing, which on the one hand (DLP Policy H15) promotes a step change in the delivery of this type of housing from an estimated 200 unit per annum to 4,000 units per annum. On the other hand, the Mayor is proposing to make the delivery of older people’s housing consequently more difficult than is already the case in a London context by inflicting even greater risk on developers (DLP Policy H5, H6, H7, H9, H12). This approach is illogical and has been proposed without consultation with the industry as the Mayor expects the industry to increase output in this sector by **2000%** per annum (from a current estimated supply annual of 100-200 units).

The review of the London Plan is fundamentally flawed as it exceeds its remit as a strategic document yet does not provide the required level of evidence to be sufficiently robust to justify the detail of the policies proposed.

User: Chessington World of Adventures

CWoAR objects to the approach set out in paragraph 0.0.20 of the draft London Plan. This paragraph states that elements of the Plan can be inconsistent with national policy, mainly where these relates to a specific mayoral commitment. The draft London Plan should be consistent with national policy and/or guidance. CWoAR's primary concern is where this incorrect approach relates to green belt policy (discussed later in this letter).

Suggested supporting text wording / approach

[strikethrough = suggested omissions]

0.0.20. The policies in the Plan have been developed over a number of months and are supported by a proportionate evidence base. In their development, the Mayor has had regard to the need to ensure consistency with national policies, but does not seek to repeat them. Instead the London Plan seeks to develop an approach tailored for London, and act as the key document shaping planning decisions across the capital. ~~On some occasions, the Plan deviates from existing national policy and guidance; this is mainly where the Plan is delivering on a specific Mayoral commitment and reflects the particular circumstances of London. The scale of the Mayor's election victory provides a significant political mandate to use the planning system to deliver his manifesto commitments.~~

[**note:** while paragraph 0.0.20 should be altered in the manner set out above, the key point is that the policies throughout the draft London Plan should be consistent with national policy and supported by a robust evidence base].

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The Mayor of London has to prepare and publish a spatial development strategy, under s334 of the Greater London Authority Act (1999) (as amended) ("the GLA Act"). Section 41 of the GLA Act makes clear that in preparing or revising the spatial development strategy for London (i.e. iterations of the London Plan), the Mayor *"shall have regard to[...] the need to ensure that the strategy is consistent with national policies".* These national policies are primarily included in the National Planning Policy Framework ("NPPF"). Section 337 of the GLA Act is clear that inconsistency with current national policy is sufficient justification for the Secretary of State to direct the Mayor not to publish a spatial development strategy (i.e. an iteration of the London Plan), unless these inconsistencies are addressed.

There is in effect a statutory requirement therefore for the London Plan to be consistent with national policy. This requirement is reflected at paragraph 2.5 of the GLA document *'London Planning Statement Supplementary Planning Guidance'* (2014) ("LPS SPG"). It is also recognised in the current London Plan (2016), which directly references *"the need to ensure consistency with national policies"* (paragraph 0.5).

A political mandate can influence the Mayor's development planning strategy (and his other strategies) and the policy approach taken in a draft development planning document, although such a mandate is insufficient justification, without an appropriate evidence base, for the inconsistency with national policy noted above.

User:	Chessington World of Adventures

Paragraph 0.0.20 of the draft London Plan states that deviation from national policy occurs partly where it *"reflects the particular circumstances of London".* Notwithstanding that consistency with national policy is required by the GLAAct 1999, it is considered that NPPF Green Belt policy remains fit for purpose and relevant to London and its Green Belt. It does not require refining in the draft London Plan, nor is it appropriate for the Mayor to do so.

User: Regeneration X

Introduction:

'Good Growth' is not about supporting growth at any cost'. This is a nice little statement but it isn't believable that the boroughs or The Mayor (or The Government via ministerial interventions) will say 'no' to bad growth – London will get the numbers in this document but not the quality. The approach should be turned around – if we don't get the things which make growth good there will be no growth.

Central to the plan is how we can help Boroughs better co-ordinate growth across London – it includes strong new measures and sets ambitious targets for every London Borough for building the London we need. Who is the 'we' mentioned here? Who is this London growth for – the people who live and work in London or those who invest in London? Is London for people or international finance and investors? How the benefits of London's growth are distributed are just as, if not more, important than growth itself. It seems to be accepted as a given that London can and will just grow and grow in order to suit the needs of investors. Studies and evidence show that cities can get too big, and beyond a certain level the size of a city negates the benefits of size and agglomeration. London is already at this size – where its size begins to bring dis-benefits; so it is very disappointing that this evidence has been ignored and not referred to.

It is very disappointing that there are no targets for employment space and buildings for jobs for each borough. There seems to be no employment plan or strategy. Too much is focused on the CAZ and its international focus – not everyone in London works in (or even wants to work in) the CAZ. Many London residents' travel-to-work-area ignores the CAZ and involves travel across London Borough boundaries rather than into the CAZ. In the outer boroughs many residents' travel to work area is away from London and is into the surrounding counties. None of this seems to be acknowledged or recognised in the draft London Plan. Too much of the draft Plan is focused on London as an international city and too little on the proportion of the economic and social activity which is 'domestic' (both intra-London activity and London's relationship with the rest of the UK) other than these areas being a supplier of labour to London.

The Mayor says “I want a city that works for all Londoners”. In which case is he willing to accept that this may mean that those who live in London take precedence over those who invest in London – that London is for Londoners, not globalised capital and investors? If he isn't this is just window dressing and empty words.

The document says that the Mayor has ambition for 'a city where people can spend less time commuting'. This is nonsense – how does this fit with CR2 and HS2 which will encourage more commuting?

It is disappointing that The Mayor doesn't mention the relationship London has with the rest of the UK and how it can increasingly help these places thrive rather than suck life and jobs from them. There is talk of coordination but this talk goes nowhere far enough and doesn't recognise the harm London actually does to the rest of the UK.

User:	Regeneration X

0.0.14 footnote – the draft plan is underpinned by housing and economic projections. The projections are based on past trends. Surely we should be looking at likely or possible future events and scenarios, and decide whether we passive accept these or try to affect them. What guarantee is there that the future will follow the past. In short, this is too passive: we should not, and we must not, passively accept the future which is 'given' to London and Londoner's – we must positively plan to deliver the future we want.

User: Julia Palca

2. Therefore, the statement at paragraph 0.0.20 of the Draft London Plan that: “On some occasions, the Plan deviates from existing national policy and guidance; this is mainly where the Plan is delivering on a specific Mayoral commitment and reflects the particular circumstances of London. The scale of the Mayor’s election victory provides a significant political mandate to use the planning system to deliver his manifesto commitments” is wrong in law, being inconsistent with section 41 of the 1999 Act.

3. Further, the Draft London Plan is intended to set out land use policies over the next 20?25 years. The Mayor’s political mandate extends for only 4 years, and therefore is irrelevant as a basis for departing from national planning policy.

User: Joy Brown

INTRODUCING THE PLAN.

0.0.20 By indicating that the Plan may deviate from National Policy, the signal is that the Mayor of London is free to do as he/she pleases. This sends out a worrying message of unlimited power for London and is not, perhaps, the right signal to the rest of the country.

User:	St Anne's Redevelopment Trust

- We agree with the comments made in the Forward referring to Londoners feeling “excluded” which contributes to “a lack of community cohesion and social integration”.

Growth Corridors and Opportunity Areas

User:	Association of Licensed Multiple Retailers

The hospitality sector relies significantly upon non-UK migrants to augment its workforce, so welcomes the Mayor's approach of seeking to accommodate rather than limit immigration. London in particular, has high rates of non-UK workers in pubs, clubs, hotels and restaurants, filling often hard to fill roles such as chefs. By aiming to provide living space and travel infrastructures to allow them to travel easily between work and home, as well as to venues for all to visit, is a welcome objective.

User:	Design Council

We welcome the proposed coordinated investment in transport and other infrastructure around growth corridors, as a means of stimulating housing and employment growth which in turn can fund infrastructure investment. In addition to the emphasis on strategic growth corridors, the scale of densification across the city will require a step change in the enhancement of the transport network particularly outside of zones 1 and 2. The healthy streets approach is an important part of this but will needed to be supported by greater local connectivity in outer London locations. This level of investment will require a variety of funding sources. We support the continued use of Mayoral CIL as a means of raising funding for strategic infrastructure investment and would recommend that the GLA explore other means and opportunities for land value capture.

User: London Borough of Camden

Paragraphs 2.1.66-67 mention comprehensive development of Euston. This needs to make clear that this applies to redevelopment of the station itself in creating a world class sustainable transport interchange. This includes redeveloping the 'classic' and HS2 parts of the station and Crossrail 2 (CR2) in a fully co-ordinated and comprehensive manner towards a single vision rather than piecemeal development. It should also include wider redevelopment of the Euston area including over station development and other development in the area precipitated by redevelopment of the station.

The Plan should state that redevelopment should improve the transport facilities in a sustainable manner, i.e. prioritising sustainable transport modes for onward travel, in accordance with the Mayor's Transport Strategy. In addition to the stated intention of supporting the area's strengths, redevelopment should maximise regeneration, improve the local environment, provide quality public realm and fully integrate the station into its surrounding area, including in terms of accessibility. The reference to Crossrail 2 should to refer to its timely delivery.

The Plan needs to refer to the construction process of HS2, given that this will continue until 2033. This will have a significant impact on a wide area and will continue well beyond the period of the new London Plan. In particular, the Plan should state that the Mayor and TfL will continue to work with HS2, local authorities and other agencies such as Network Rail to reduce the impacts of the construction of HS2, for example seeking to maximise opportunities to carry material by rail and any other alternative measures to reduce the number of construction vehicles, protect the environment and safety of other users of the public highway, especially of vulnerable road users.

Heathrow/Elizabeth Line West

User:	Heathrow Airport Consultative Committee (HACC)

Passenger Demand Forecast

2. The HACC accepts the DofT's revised passenger forecast in which demand is higher than previously expected and that this growth is concentrated in London and the South East. London Airports will therefore be further constrained and additional capacity will be required.

3. There is a view by some members that this additional demand should be constrained by the use of fiscal measures.

Monetised Benefits

4. The HACC notes that the monetised benefits from the higher levels of passenger demand are now more evenly balanced between Heathrow and Gatwick.

UK Airspace Policy

5. The HACC welcomes the Government's response to the consultation on UK Airspace Policy and in particular:

The call-in powers by the Secretary of State on airspace changes of national importance.

The new metrics to assess noise impacts and their effects on health.

The Independent Commission on Civil Aviation Noise (ICCAN).

Air Quality

6. The HACC has expressed concerns that there is a ‘high risk’ of a three runway Heathrow failing to be compliant with air quality targets between the time the new runway is expected to open in 2025 and 2029 – thereafter the risk falls to ‘medium’. Heathrow actions to mitigate this are limited as aircraft will continue to use fossil fuels for the foreseeable future. Improvements to air quality must therefore come from changing surface transport to hybrid/electric vehicles for those accessing the airport and those using the M4/M25 motorways. Furthermore, there must be greater use of public transport by airport users/employees. Government incentives will be needed to accelerate this change.

Noise

7. The HACC recognizes that all the schemes have the potential for significant negative noise impacts. It is estimated that around 93,000 more people will be affected by noise with a third runway in place compared to a two runway Heathrow – by 2030 some 650,000 will be affected. There should be some alleviation through the introduction of quieter aircraft and the HACC believes this move should be incentivised by Heathrow. It is likely that more annoyance could be caused by the increased number of aircraft using the airport, particularly to people who are newly under a flight path and the Government needs to assess this when coming to a final decision.

Surface Transport

8. The HACC notes that no further work on the costs of surface access has been carried out. This means the costs of creating sufficient road and rail schemes to serve either a second runway at Gatwick or a third runway at Heathrow remain uncertain and it is not clear who will provide the funding. The HACC believes both the costs and the funding must be clarified before any decision is taken on runway expansion.

User:	Heathrow Airport Consultative Committee (HACC)

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High Speed 2 / Thameslink

User: Mr Peter Eversden MBE

The West London Orbital Line from Brent Cross to Hounslow mentioned in paragraph 2.1.55 is supported strongly and its feasibility, cost and timescale should be explored at the examination of the Replacement London Plan. Policy content for its delivery should be covered in Chapter 10 T3.

Opportunities for stopping HS1 trains at Straford is not considered in this section of the Replacement London Plan. It would improve transport links and avoid HS2 passengers having to negotiate Euston and St Pancras stations to access HS1 when they could transfer at Old Oak to the Elizabeth Line.

It would also avoid overloading of those Central London stations and should be covered by relevant content in Policy for HS2.

User:	Rosalind Readhead

The plan places too much emphasis on the role of major infrastructure projects such as HS2 and Crossrail 2 to act as catalysts for development. Housing and other development schemes can and must be prioritised irrespective of the fate of such major projects.

User: London Wildlife Trust

High Speed 2 / Thameslink

Old Oak Common OA
We recognise the work to date under para 2.1.57, but still have significant concerns on the likely environmental impacts on the ecological integrity of Wormwood Scrubs. This is recognised in the OPDC's Environmental Standards Study – "Insufficient onsite provision of public open space is also likely to put unacceptable pressure on Wormwood Scrubs"7 - but as yet there not a strong enough policy direction within the OPDC revised draft Local Plan (under Policy EU2: Urban Greening and Biodiversity) to address this.

User:	London Wildlife Trust

Heathrow/Elizabeth Line West
We welcome the reference under Para 2.1.62 to environmental improvements. Planning frameworks should include an assessment of any effects on the South West London Water Bodies Special Protection Area and appropriate mitigation strategies.

Infrastructure

User:	London Forum of Amenity and Civic Societies

Paragraph 11.1.26 states that delivering the schemes in the Mayor's Transport Strategy will require £3.3 billion each year. It is implied (paragraph 11.1.27) that the Government will have to assist financially.

Paragraph 11.1.30 explains that most of the schemes listed in Table 10.1 for transport improvements are currently unfunded and additional sustainable funding sources and project-specific deals and grants will be needed alongside contributions from London boroughs and the private sector.

Introduction to Chapter 2

User:	Mr Peter Eversden MBE

The London Plan's Key Diagram in each Plan version has been difficult to read and hence to understand and use.

In addition to the full diagram, the Replacement London Plan should contain additional diagrams of each of the Key Diagram's four outer parts and of the central area, with overlaps, allowing larger text and, perhaps, indicating borough boundaries.

User: Mr Peter Eversden MBE

Paragraph 2.0.7 is supported strongly for its aim for regeneration and developing benefitting local communities.

It would be useful to add in that paragraph that communities should be fully engaged in development plans and their needs taken into account. There should be no displacement of key workersand those in other local employment.

User:	Mr Peter Eversden MBE

The words "properly integrated" are too vague. There should be cross references to policies for context, character and consideration of historic environment and available services, such as PTAL (see Glossary), Policy D1 B 1), D2, D6, D7, D8, G6, HC1, HC2 and HC4.

User: Mrs Sarah Perry

There are many more pockets of public open space and local green spaces that contribute to promoting, and protecting, London's biodiversity along with giving Londoners access to green space to promote health and well-being, and these are not solely designated at Metropolitan Open Land, Local Nature Reserves, or Green Belt land.

These parks and green spaces, especially in regards to "hinterlands" around development and green corridors, need to be afforded the same relevant protections from development as MOL/Green Belt land, in order to contribute to the Plans's target of 50% green cover by 2050 and increasing biodiversity, reducing ill-health and poor air quality.

Furthermore, new green infrastructure needs to be included in planning decisions/applications from the beginning, instead of being retrofitted into a development plan as an after thought, which causes longevity problems for the green infrastructure invested in. Street trees are an example of planning after-thoughts whereby the cradle of the trees are not large enough to support long-term growth/adequate watering and nutrition and they will ultimately die sooner with no funding provisions made to replace them. This will affect the London Plan target of 50% cover by 2050 in the long term. The Plan could make specific recommendations about the need for pre-planning/integrating green infrastructure early in development applications, espcially in relation to street trees/shrubbery, that will help secure a longer term future for this investment. and meeting the aims of the London Plan targets

User: PM London

Recognising the issues associated with growth is an important element of the plan and we believe it should be more prominent in the document. We believe that the continued reliance on ever-increasing growth sets an extremely dangerous paradigm, not just for London but for the wider global population. We are happy to see that issues with growth are recognised in some form but believe that more should be included in this document around the effect of population growth on already stretched resources. To say that some parts of the city have not benefited from the advantages of growth (we presume you mean the financial advantages) is something of an understatement. The statement also fails to highlight that many of those who have failed to reap the benefits of population growth have had to endure the negative aspects of growth (air pollution, public transport pressures, the housing crisis to name some of the most pertinent issues).

User:	Mrs Lynne Bailey

Totally agree, the green belt and green spaces need to be preserved for the benefit of all Londoners.

User:	Mrs Lynne Bailey

If there are significant increases in housing levels in the outers boroughs, how will the transport system cope with the increased numbers? Trains are overcrowded currently; hence it would help for any significant increase in housing to be timed so it fits appropriately with transport initiatives eg Crossrail 2.

User:	Mr Anthony Wheeler

"genuinely affordable housing"

Here we go again. Strict financial parameters please, so we're all singing from the same song sheet.

User: Mrs Sarah Witney

Although I agree with the sentiments of protecting open spaces, 2.0.3 is unacceptable.You are saying "destroy the character and essense of our suburbs missfortunate enough to be London Boroughs so we can continue to squash more people in". Outer London with it's heavily overcrowded East/ West train lines and gridlocked buses "scrapes by" at current housing density. With average journey's to work exceeding an hour and fairs 10% of income for lower paid workers going in fairs I disagree strongly with this sentiment.

User: Mrs Sarah Witney

Although the sentiment of this is admirable, no such infrustructure exsits for communities far larger than this in Outer London now so I am afraid I feel very inclinde to ignore it.

1. The value of land for building flats far exceeds the return form Leisure Centres, Cinema's & supermarkets

2. Local Councils can not force loss making business in to an area & since the public transport only runs to Central London & you dismiss the need for cars, it is likley that these businesses WILL FAIL.

I currently live 40 minutes by polluting bus from a Cinema and although I have a Council subsidised leisure centre, the public swimming times do not work for me and all classes I might attend are fully booked & wait listed.

User:	Levitt Bernstein

Diagram is complicated and requires simplification - perhaps the layers can be broken down and shown on separate layers in a series of supporting diagrams.
The colours on the diagram for the opportunity areas are difficult to read.
The diagram also needs to show the hierarchy of key locations, opportunity areas etc. and demonstrate the ‘corridor’ relationships that are happening within London.

User:	Levitt Bernstein

- Paragraphs 2.0.1 to 2.0.3
  Whilst this is intended to provide an overview to the section, there could be a problem statement or more specific context prior to or within this?

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Paragraphs 2.0.1 to 2.0.3 Whilst this is intended to provide an overview to the section, there could be a problem statement or more specific context prior to or within this?	

User:	Levitt Bernstein

‘beyond London’s boundaries’ – beyond zone 9 should also be considered

‘collaboration’ - add more information here: closer working relationships and joint ventures would help. Taking a more regional approach or focus will be integral in achieving successful cross-borough collaboration.

User:	Levitt Bernstein
Add in the value of High Streets.	

User:	London Forum of Amenity and Civic Societies

Figure 2.1 - The London Plan's Key Diagram in each Plan version has been difficult to read and hence to understand and use. In addition to the full diagram, the Replacement London Plan should contain additional diagrams of each of the Key Diagram's four outer parts and of the central area, with overlaps, allowing larger text and, perhaps, indicating borough boundaries.

In addition, **each** of the maps in the New London Plan should be available in high quality on the GLA web site in a way that would allow zooming and viewing for local areas within the map.

User: London Forum of Amenity and Civic Societies

In **paragraph 2.0.7** the words "properly integrated" are too vague. There should be cross references to policies for context, character and consideration of historic environment and available services, such as PTAL (see Glossary), Policy D1 B 1), D2, D6, D7, D8, G6, HC1, HC2 and HC4.

Paragraph 2.0.7 is supported strongly for its aim for regeneration and developing benefiting local communities. It would be useful to add in that paragraph that ‘Communities should be fully engaged in development plans and their needs taken into account.’ There should be no displacement of key workers and those in other local employment as a result of local development and regeneration.

User: Mr Simon Hunt

The salient phrase is "over time". Any intensification of housing stock in outer London should be done gradually, in a phased approach with impact assessment at agreed deliverables/time periods.

It is bad planning to increase expectations dramatically in one 'hit'.

User: London Assembly Green Party Group

My main criticism of these polices is the absence of real community involvement set out in them, especially when it comes to the new local Strategic Areas for Regeneration near town centres.

I am also concerned that this new draft Plan removes the previous London Plan's policy 2.4 on the 2012 Games and legacy. I believe this is too soon, as the games were only five years ago. Many of the regeneration targets, including the measurable convergence goals for the Growth Boroughs, have not been reached and need continued monitoring.[i]

The Growth Boroughs Partnership, on its website, says: "The most enduring legacy of the Olympics will be the regeneration of an entire community for the direct benefit of everyone who lives there," and emphasises that: "Delivering this commitment will be neither simple nor quick."[ii]

The Mayor should continue to push to achieve the goals of the 2012 Games and they should be included in this Plan.

[i] Relighting the torch – securing the Olympic legacy. London Assembly Regeneration Committee, Nov 2017 https://www.london.gov.uk/sites/default/files/convergence_short_report_final.pdf

[ii] Growth Boroughs Partnership http://www.growthboroughs.com/

User:	Mr Chris Gannaway
strongly agree	

User:	Mr Chris Gannaway

disagree strongly, outer London should blend into the greenbelt not have a hard development with the surounding contryside there is no place for intensive development ie High rise/high density development in these areas

User:	Mr Peter Martin

The scope for 'appropriate intensification' in the suburbs has been over estimated.

User: Atkins

Please see Atkins overall London Plan Comment 1 - Joined-up Approach

We believe that the London Plan's Key Diagram should be accompanied by a more granular diagram that shows how London Boroughs should plan holistically to nurture sustainable communities. We feel that there is a need to ensure that policy direction is not narrow in focus (e.g. Retail on Ealing Broadway) but is connected to culture, housing and economy in a more joined up manner.

This would involve considering and demonstrating the linkages between Plan designations, and at different spaces and scales of the City and its Boroughs.

We provide illustrative examples in our full comment #1.

User:	Love Wimbledon BID
Sustainable and inclusive regeneration whilst maintaining individual character and personality of the area will be paramount to be successful	

User:	Buckinghamshire County Council

Support the police objective that all parts of London need to embrace and manage change and Outer London, where the suburban pattern of development has significant potential, has the opportunity for appropriate intensification over time, particularly for housing; the Opportunity Areas (OAs) to be clustered into strategic Growth Corridors; the Central Activity Zones (CAZs) and Town Centres, and for many the surrounding areas have potential to accommodate significant quantities of new housing as part of mixed-use development and integrating community and leisure activities and the Strategic and Local Regeneration Areas to be the focus for sustainable and inclusive regeneration.

User: Arcadis LLP

We consider that the Consultation Draft presents an extensive document above what would historically be expected to form a Strategic Plan but in some cases, we would encourage further clarity to provided on some of the key policies.

At its core, the Draft Plan promotes the principles of ‘good growth’ through appropriate spatial development patterns, leading to a healthy community and this overriding principle is supported.

User: Eastcote Conservation Panel

The Mayor does not appear to realize the difference between inner and outer London. A one size fits all plan cannot and will not work.

The Mayor does not explain his thinking when using the phrase ‘appropriate intensification’.

This could mean anything. A plan of this magnitude should be clear and concise, not left open to interpretation and conjecture. Any new development should blend in with the surrounding area and not be over dominant, the policy of small developments could and will change an area beyond all recognition thus becoming over dominant and destroying the community, culture and heritage of the village or town.

High rise or tall buildings in the centre of towns will be out of context with any Metroland Town.

User:	Environment Agency

We consider that the environment is currently under-represented in the policy objectives for growth corridors and Opportunity Areas. Communities' resilience to climate risks should feature in the text as an objective of 'good growth', and to support policy GG6.

User:	Environment Agency

We firmly welcome the Mayor’s recognition of the need for further collaboration on strategic matters within the Wider South East area. This will ensure that planning for environmental infrastructure is actioned strategically and early, and that environmental capacity is considered.

User: Environment Agency

We note that transport infrastructure is shown in isolation from other key factors which will determine the extent and speed of growth in the Opportunity Areas and elsewhere. Our concern is that environmental capacity and infrastructure is not provided the same profile in the Key Diagram, nor in the subsequent text in this chapter. We accept that it is not possible to map all environmental, social and economic factors on the Key Diagram. Nonetheless, there are environmental determinants of growth potential, for example the flood risk profile, which require appropriate recognition and mapping later in the Plan. These factors could be recognised in the text and diagrams for individual Opportunity Area sections, and linked to topic-specific policies. Our comments below refer.

(Please see PDF Appendix A for full document)

User:	Environment Agency

We welcome the reference at paragraph.2.0.2 to the vital part that London’s parks, rivers and open spaces have in the quality of life for Londoners.

User:	Environment Agency

Recommendation:

Amend the policy and its explanatory text to promote the Mayor’s aims for ‘integrated solutions’ in delivering utilities and other infrastructure for the Opportunity Areas. This would support, and should link’ to subsequent design and sustainable infrastructure policy areas, e.g. Para.9.5.12, calling for the consideration of Integrated Water Management Strategies. It would further support the Mayor’s Environment Strategy.

User:	Greenspace Information for Greater London CIC (GiGL)

GiGL response: the ecosystem services delivered by a healthy natural environment are of benefit to Londoners even without their active engagement with it. The **‘within reach**’ wording is unnecessary.

User: Diocese of London

Paragraph 2.0.7 highlights our concern that growth and change need to benefit all Londoners and so we are pleased to see the statement ‘It is important that there is a strong focus on sustainable and inclusive regeneration in these areas, with boroughs, the Mayor and other partners working closely with the local community to bring about the right sort of change and investment’.

We hope that you will see the Diocese as one of these partners. With reference to the following statement ‘Where significant development is planned in these areas, it is crucial that it benefits local communities, provides employment and genuinely affordable housing, and is properly integrated into the area’ I would draw your attention to the work of our Strategic Development Committee and its supporting team who are actively working with local parishes and partners to ensure there is an Anglican or other faith community presence in some of the capital’s largest development areas such as Queen Elizabeth Olympic Park, Earls Court, Cricklewood and Old Oak and Park Royal.

User:	Redington Frognal Neighbourhood Forum

Chapter 2 Spatial Development Patterns

Paragraph 2.0.4 requires an additional sentence at the end,

“Neighbourhood Plans also have a role, as a localised and responsive part of the planning system, which can adjust at speed to changed circumstances. Such plans can also lead to greater engagement and support from local people in areas of major change.”

User: London Wildlife Trust

We note the Mayor’s growth proposals. The identification of growth corridors, and the clustering of Opportunity Areas (OAs) encourages a strategic approach to be taken to identify integrated solutions to protecting and enhancing the existing natural environment in these OAs, and delivering further environmental infrastructure.

However, we consider that the environment is currently under-represented in the policy objectives for the growth corridors and Opportunity Areas (plus there is some inconsistency as to when and where it is referenced). This should be further developed across this Chapter to better integrate it with the objectives of the policies in Chapters 8 and 9.

User: London Wildlife Trust

We welcome the reference under para 2.0.2 on the critical contribution to the 47% green and blue space coverage of Greater London. However, Green Belt and MOL are not the only designations of strategic importance, and they serve more functions than just providing openness and preventing sprawl. We recommend the following amendment.

2.0.2 London's green and open spaces are a vital part of the capital. Its parks, rivers and green open spaces are some of the places that people most cherish and they bring the benefits of the natural environment within reach of Londoners. London's **Green Belt, ~~and~~ Metropolitan Open Land and protected wildlife site** designations (see Chapter 8) serve to protect these strategically important open spaces, prevent urban sprawl, help provide resilience and focus investment and development on previously developed land.

User:	London Wildlife Trust

We are concerned that environmental capacity and infrastructure is not provided the same profile in the Key Diagram (nor in the subsequent text in this chapter). Whilst we recognise that it is not possible to map all environmental, social and economic factors on the Key Diagram, there are environmental determinants of growth potential (such as water security, flood risk profile), which require appropriate recognition and mapping later in the Plan.

User:	Mr Chris Rose
2.0.3 - outer London intensification = a licence for garden-grabbing to which I am opposed.	

New London Plan - Consultation draft

User: Mr Robert Wilson

Before emphasising some specific points from the HWA Response (below), I wish to highlight the truly dreadful failure to communicate and allow proper opportunity to consult on such a critical document.

The Mayor says that communities are at the heart of the DLP. As such, it must be right that he ensures the opportunity to respond in consultation - and build the partnership he is looking for.

Please extend the consultation period, with good presentation of key issues.

User: Sainsburys Supermarkets Ltd

Sainsbury's Supermarkets Ltd is pleased to have the opportunity to respond to the Draft consultation London Plan (DLP). These representations relate to both the Sainsbury's and Argos estate and the aspirations we have for both elements of our business.

As you are aware, Sainsbury's and Argos are significant employers within London. First and foremost, we are a retailer and our primary focus is to protect our existing estate throughout the capital, while also exploring opportunities to expand our offer and continue to provide the best service to our customers.

Notwithstanding this, in recent years, we have delivered 1,637 new homes on strategic sites and are progressing regeneration opportunities with the capacity to deliver 3,400 more. Schemes such as Fulham Wharf and Nine Elms underpin our success in this area. These schemes have delivered significant benefits providing the:

? sustainable intensification of sites;

? modern replacement and expanded retail space to better serve our customers; and

? delivery of much needed quality new homes.

As you will be aware, our current focus is on our stores at Whitechapel, New Cross Gate and Ilford, however we continually examine the rest of our portfolio to identify significant new redevelopment opportunities. We hope to continue working with you to deliver these opportunities and make a significant contribution to the new homes needed within London.

With the above in mind, the DLP consultation presents a good opportunity for us to clarify our position on some of the key planning matters which will shape the city over the next 20 years. These comments are provided in specific respect of matters thatwill have direct relevance to our future aspirations. We deal with these matters in turn below.

General Approach of the Draft London Plan Overall, we are supportive of the approach and a number of policies in the DLP and we will deal with this below. However, the current consultation document is too prescriptive and contains too many detailed policies.

Whilst we appreciate the intention, Section 334 of the Greater London Authority Act (1999) clearly states that the spatial development strategy for London includes “general policies in respect of development and the use of land in greater London”. Moreover, Section 334(5) specifically identifies that the “spatial development strategy must deal only with matters which are of strategic importance to Greater London”. This aspiration is repeated at Section 0.0.4 of the draft document.

The DLP contains numerous prescriptive policies that are better placed within individual borough development plans. The level of detail results in policies which are simply not of strategic importance and place too much emphasis on specific development control matters.

This level of detail is, firstly, unnecessary and, secondly, is contrary to the GLA Act. We trust that the Mayor acknowledges this and amends the document to ensure that it becomes the strategic overarching policy document it is meant to be, providing direction to individual London Boroughs.

User: The Institute of Cancer Research

Re: Draft New London Plan – The London Cancer Hub We are writing to update you on our ambitious plans to create a truly world-leading lifescience district specialising in cancer research, treatment, education and enterprise in London, and ask that the New London Plan be updated to reflect the progress that we have made.

We were delighted to see that The London Cancer Hub was referenced in the draft New London Plan, section 2.1.68, saying: The proposal to extend the Tram to Sutton Town Centre, and potentially beyond to the proposed Cancer Hub, would improve public transport accessibility to the town centre and St. Helier Hospital, and support the delivery of at least 10,000 homes.

We welcome the recognition of the importance of the tram development to supporting local growth. Delivering our ambitious vision will require significant enhancement to public transport so your support on this greatly appreciated.

However, much has progressed with The London Cancer Hub project since you visited us in 2016, and we would welcome an update to the text above to remove the word ‘proposed’ to the name of the hub as work on the development is now well underway and we see this project as much more than a proposal.

Since your visit, the Council has invested £28.1 million to purchase the additional land required for the project – doubling the area available for our cancer research and commercial enterprise. The London Cancer Hub partnership has now appointed commercial advisers to identify and attract the partners we need to begin the next wave of development.

On the existing land already owned by the partners, work has already begun on two new buildings. Site works began in September for The Institute of Cancer Research’s Centre for Cancer Drug Discovery – a new, state-of-the-art drug discovery facility – and a key part of The London Cancer Hub’s aim to accelerate delivery of new cancer treatments.

In addition, building work is now underway on the £40m Harris Academy Sutton – a science-specialist school on the site that is set to be completed next September – for which the proximity to the pioneering scientists, doctors and technicians of The London Cancer Hub will support its primary specialism in life science.

We are excited to reach these important milestones in creating The London Cancer Hub, by breaking ground on building projects and unlocking the site for further development with the additional land purchase.

We would welcome an update to the London Plan to call the project ‘The London Cancer Hub’ rather than ‘the proposed Cancer Hub’ in recognition of this major progress that we have made.

User: Andrea Carey Fuller

There needs to be a chapter on Neighbourhood Forums and the Community & Voluntary sector being enabled by resources from the GLA to contribute to the Development, Monitoring and Evaluation of the London Plan. Particular emphasis should be put on Neighbourhood Plans which sit under the London and Local plans and support given to them to help maintain a right to a community and to support objectives for social justice such as:

Being able to designate protection for green and open space and local green spaces as such before the Plan goes to Referendum.

To be supported by Local Authorities in actively designating land for community self build and community re-cycling projects – via a joined up approach of LA's working with Network Rail to ring-fence some land for these purposes.

User: Vassall and Coldharbour Forum

These comments refer to

Policy GG1 Building strong and inclusive communities

Policy S1 Developing London's social infrastructure

Policy HC5 Supporting London's culture and creative industries and

Policy HC7 Protecting Public Houses

My name is Ceri Buckmaster and my organisation is Vassall and Coldharbour Forum In Vassall and Coldharbour Forum (VACF), we have Values or guiding principles that have come out of years of collaborative pain and joy. Here, we are using them to respond to the London plan. The parts in bold are our comments on the draft London Plan, and we have left the Guiding Principles in so you understand the values of the community who are offering these specific comments. It may take a bit more effort for you to take on board our comments, but we want to remedy our invisibility in the planning process and also make transparent the values that are underpinning the comments.

VACF Guiding Principle 1. We value COLLECTIVE, OPEN AND ACCESSIBLE WORKING PRACTICES that are open to and build with community. Comments on the draft London Plan coming out of this principle: Participation in the draft London plan has not been enabled for each and every community member and group to become involved in its process. For example, In Policy S1, regarding Developing London’s social infrastructure, the phrase ‘Development proposals’ appears three times and ‘seeking, maintaining and supporting community participation’ doesn’t appear once.

VACF Guiding Principle 2. We VALUE the life-ways, knowledges and experiences of each and every community member, especially those who are less acknowledged on account of their race, gender, class, income, ability or religion. We work towards the full acknowledgement and participation of each -community member. We actively BUILD TRUST. Comments on the draft London Plan coming out of this principle: We are concerned that it does not build the trust, nor an appropriate platform necessary for increased engagement in public processes. We don’t see the life-ways, knowledges and experiences of each and every community member acknowledged in the plan.

VACF Guiding Principle 3. We DRAW ATTENTION TO how important all people and all heritage is in building community culture, because it makes it strong and stable across generations. We act in ways which demonstrate that both people and heritage grow SUSTAINABLE COMMUNITY. We resist the erosion of what we have built, through struggles and through careful negotiation, over time and we invite creative input from all members of the community. We acknowledge how both people and heritage grow SUSTAINABLE COMMUNITY and are concerned about the erosion of what Londoners have built, through struggles and through careful negotiation, over time and we invite creative input from all members of the community. Comments on the draft London Plan coming out of this principle: We would like to see embedded in the London plan, inclusive ways for communities to become stronger and more robust, enabling those with expertise to ‘pass the baton’ and share this expertise across age/race/income/ability/income/gender divides. We don’t see in the Plan suggestions for how to redress and remedy the ways people have been disunited by building developments across London. We don’t see in the Plan any action to honour the feelings of fear and loss about the changing nature of neighbourhoods? We don’t see in the Plan recommendations to encourage the community to invest time and resources in community run, community focussed organisations? We don’t see in the Plan acknowledgement of how Housing estates provide a wide range of community spaces – community halls, open spaces, playgrounds and other facilities – nor a protection of these spaces and support to use them to greater and fuller capacity.

VACF Guiding Principle 4. We WELCOME AND NURTURE DIVERSITY OF COMMUNICATION AND INPUT by encouraging a range of communication styles to help grow and inspire more shared, abundant and co-creative engagement. Comments on the draft London Plan coming out of this principle: We don’t see in the plan strategies for implementation to help nurture diversity, and grow and inspire more shared, abundant and co-creative engagement.

VACF Guiding Principle 5. We are rooted in the local but balanced by looking at the ‘global’. We think and act in a way that increases the community’s awareness of itself as well as its understanding of outside initiatives and the wider social, economic and political context. Comments on the draft London Plan coming out of this principle: We don’t see in the Plan strategies to help produce a shift in thinking so that access to and the value of community spaces is not based on business plans and income generation, but on the social value of the community space and its contribution to health and wellbeing, inclusion, integration, empowerment and poverty reduction. Without specific support to access community spaces, how can communities meet, grow and learn together; how can poorer communities host their own learning and initiatives for well-being? With specific support to access community spaces, how can the recommendations, as they stand in the London Plan, support individuals to grow their awareness, participation and self-created improvement of individual and family opportunities. With specific support to access community spaces, how can the very people who hold the knowledge and wisdom to support the wellbeing of communities do so, without a valuing and resourcing of community-centred knowledge? With specific support to access community spaces, how can the whole community work alongside the GLA for a London that works for all, without specific resources to support us?

VACF Guiding Principle 6. We CARE ABOUT FAMILIES, CHILDREN and WORK-LIFE BALANCE. We understand that at the personal, family and community level that spiritual and emotional well-being is important. We also understand the importance of children, elders and people with disabilities being well cared for within the context of safe, sound and shared family and community responsibilities, and we strive to support this happening as we progress. Comments on the draft London Plan coming out of this principle: We really question the concept of good growth if inequalities are not being addressed and means it is so hard for some members of our community to meet needs for their own, their family’s and community’s well-being? We would love to see a Plan for London that really acknowledges everyone’s needs mattering equally, which involves looking at how different Londoner’s needs for safety, equality, wellbeing aren’t being met. We would love to see a plan that acknowledges and values spiritual and emotional wellbeing.

VACF Guiding Principle 7. We value the importance of healthy, safe and inspiring environments to live and work in and that each member of the community, from child to elder has a responsibility to contribute to both creating and maintaining such an environment. Comments on the draft London Plan coming out of this principle: We don’t see any consideration to the impact of intensification/densification on the health and wellbeing of people and of any mechanisms you suggest to avoid this negative impact. We are concerned that with densification in poorer areas how the environment can become more safe, healthy and inspirational. We are concerned that the Plan does not support all community members to become and continue to share in the creative and sustaining responsibility of environmental care and management.

User: Maritime Greenwich World Heritage Site

We have considered the consultation document with particular reference to London's heritage and culture and the potential impact of tall buildings on the important heritage views and vistas on the Outstanding Universal Value (OUV) of its World Heritage Sites and their settings. We have also considered the document in the light of the Maritime Greenwich World Heritage Site Management Plan, published in December 2014.

We consider the document to be sound and welcome the separate section afforded to Heritage and Culture emphasising its importance in driving good growth, and the introduction of heritage and culture key performance indicators actors. We are also pleased to additions to and greater clarity on its sections on Design (Policy D8 Tall Buildings) and Heritage and Culture (Policies HC2 – HC4 World Heritage Sites, Strategic and Local Views and the London View Management Framework Supplementary Planning Guidance - SPG) along with stronger encouragement for cross border borough collaboration for the protection of World Heritage Sites in neighbouring areas. We note the Mayor's commitment to reviewing the SPG to ensure it is compliant with Policy HC3 Strategic and Local Views and Policy HC4 London View Management Framework and we would encourage this to be done at the earliest opportunity.

The new draft revised London Plan appears to slot in well with the tenor of the National Planning Policy Framework (NPPF) and Historic England's Tall Buildings Advice Note 4 and clearly references the importance World Heritage Site Management Plans. The proof of the pudding, of course, is in the implementation of the Plan and ensuring that Planning Authorities maintain a robust approach in assessing development proposals and planning applications coming on stream to ensure that the aspirations set out in the London Plan are delivered, in particular with reference to tall buildings and a responsible approach to maintaining the visual integrity of London's skyline.

We note that summary material in the consultation information pack confidently states that *“The London Plan sets the policy framework for local plans across London, and its policies must be followed when planning decisions are made”* but we anticipate that this statement will inevitably be tested. We also note that at its annual meeting in the summer of 2017, and following a joint ICOMOS/ICCROM Reactive Monitoring Mission to Westminster in February 2017, UNESCO’s World Heritage Committee expressed concern about inadequacies in the UK’s urban planning framework to manage development in the setting of the Westminster site (and by implication other London and UK World Heritage Sites). The Committee was also concerned that developments including tall buildings were being approved contrary to the advice of Historic England and that once a planning decision is consented it was not possible to challenge it save for a call-in by the Secretary of State. The Committee recommended that planning policies should ensure that the balance between protection of Outstanding Universal Value (OUV) and other benefits should be more strongly weighted towards protecting OUV. We strongly support this view and urge the Mayor to take account of the World Heritage Committee’s decisions relating to UK World Heritage Sites when implementing the London Plan.

Meanwhile, we note and applaud the Mayor’s stated interest in a strategic approach to protecting London’s World Heritage Sites and would encourage his office to take a more proactive approach to addressing cross-London issues which affect those sites. Our more detailed comments on specific sections of the draft new London Plan are set out in **Annex A** to this letter.

User: UKWA

General comments The logistics sector is vital in ensuring not only that London remains economically competitive but also to make sure that its residents and businesses continue to have access to the range of goods and services that they need on a daily basis. Ensuring the sector can function efficiently and effectively is a key necessity to the efficient working of the capital's economy and the well-being of its residents.

According to the GLA's own evidence base, land for industry and logistics is being lost at three times the anticipated level of release in the current London Plan, a rate which is harmful and unsustainable. This is happening despite there being a policy in the current London Plan to ensure that London protects and retains the land it needs to for these key purposes. It is therefore essential that this draft London Plan ensures an adequate supply of appropriate land for the logistics and warehousing sectors is maintained in the appropriate locations and at affordable costs to prevent unsustainable losses of capacity. Where any losses occur these should be rebalanced through allocating new land in the right locations and at the right price to ensure London retains the warehousing and logistics capacity it needs to sustain London's residents and economic growth.

UKWA's key concerns are:

? There already is insufficient capacity for warehousing and logistics in the capital and the current ambition is only to maintain this by setting a target of 'no net loss' rather than providing for new capacity.

? Intensification of industrial land is not the silver bullet – and a more balanced approach should be taken to make sure we safe guard and where possible increase warehousing and logistic sites.

? There should be a stronger policy protection of warehouse and industrial uses particularly for non-designated industrial sites.

? The Plan should give a much stronger recognition for the need for open yard and storage space. Policy E7 should recognise that yard space should be re-provided in new developments and should be a priority for new logistics sites.

User: Workspace Providers Board

An important step forward

We support the Draft London Plan’s commitment to policies that promote wider distribution of economic growth; promoting culture; promoting tourism; 24-hour economy, increasing efficiency and resilience. We also support its policies to ensure businesses have access to premises and infrastructure.

The policies within the Draft London Plan would represent a major step forward in the policy framework to support the provision and protection of both affordable workspace and low cost business space. Overall, we think the policy direction expressed in the Draft London Plan will have a significant positive impact.

Our comments seek to provide some of this clarity. Refining the draft policies and developing best practice and guidance will be important and will require adequate resources. The Workspace Providers Board would be happy to work alongside officers at the GLA to develop these further and to consider what new research and evaluation is required to help boroughs interpret and respond most effectively through their own Local Plans to the new affordable workspace policies in the London Plan

User: Eastcote Residents' Association

I make the following observations on behalf of the Eastcote Residents' Association (ERA) that is part of the London Borough of Hillingdon (LBH).
We would stress that we fully support LBH's submission, providing as it does such a detailed, coherent and considered response to all aspects of the plan, that affect not only the Borough, but our wider community within the Outer London area.
LBH's conclusions are that there are a number of the proposed policy changes that will have significant adverse impacts on the Borough its people, its built environment, its natural environment, its heritage and wider policy objectives.
For your information, within the Hillingdon Borough, our Association covers part of each of the wards of Cavendish, Eastcote and East Ruislip and Northwood Hills.
As such our area encompasses 3 conservation areas, 1 area of special local character, 31 grade 2 listed buildings and numerous locally listed structures. It has green spaces that are much used by local residents and external visitors and has, at its centre, a Metroland environment that is deserving of preservation.

In Sum
The London Plan's own Viability Study quotes the NPPF's remit in this regard which states that plans should be deliverable and that the sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. It goes on to say 'Understanding Local Plan viability is critical to the overall assessment of deliverability. Local Plans should present visions for an area in the context of an understanding of local economic conditions and market realities. This should not undermine ambition for high quality design and wider social and environmental benefit but such ambition should be tested against the realistic likelihood of delivery.'
We submit that the combination of the large number of policies, their mostly prescriptive nature, and the fact that some contradict others in their required outcomes, together with their being applied across the board throughout both Inner and Outer London, is at odds with the above and places deliverability in jeopardy.

User: Eastcote Residents' Association

Specific Policies that are likely to have the opposite result of that intended

Many of the policies detailed to achieve these ambitious numbers will not necessarily have the desired results and actually have the potential to adversely affect our environment. This is particularly the case for places like Eastcote and other similar areas in Hillingdon, where we have small towns and villages with strong and long histories, and Conservation Areas designed to capture their merits and preserve them.

We would cite the following examples of concepts and policies that, if enacted, are very likely to take away the special character of these areas:-

• There is a presumption for extensions, conversions, redevelopment and infill development within 800 metres of tube stations or town centres.
• There is no longer a presumption against infill building in back gardens (garden grab), contrary to the provisions of the NPPF.
• The redevelopment or upward extension of flats and non-residential buildings that will be out of keeping with the surrounding buildings and adversely affect the skyline.
• The reduction in property sizes, with a greater emphasis on 1 and 2-bedroom properties, and the suggestion that family homes can be viably reduced in size. Such policies will also reduce the provision of quality ground level amenity space.
• The lack of specific support for the preservation of Conservation Areas, Areas of Special Local Character and Statutory and Locally Listed Buildings.

LBH's submission has commented on all the above and we very much support the detailed valid points they have raised in all cases.

User:	Public Health England

Built Environment

? Percentage of physically active adults - current method

? Percentage of physical inactive adults

? Utilisation of outdoor space for exercise/ health reasons

? Killed and seriously injured by cars

Environment

? The rate of complaints about noise

? Percentage of the population exposed to road, rail and air transport noise of 65dB(A) or more, during the daytime

? The percentage of the population exposed to road, rail and air transport noise of 55 dB(A) or more during the night-time

? Fraction of mortality attributable to particulate air pollution

User: London Stansted Cambridge Consortium

We would note up-front that **we feel it is remiss that the draft London Plan does not specifically reference London to Cambridge the *UK's Innovation Corridor*** given: the economic potential of the area; its importance to the future growth of the UK; the range of partners (in and outside of London) united in the consortium; and the role the Corridor and Consortium can play in promoting and realising the benefits of Crossrail 2.

LSCC is generally supportive of the new draft London plan and welcome its focus on good growth, transport infrastructure, collaboration, sector growth and air pollution. Key points identified include:

· There are currently no references to London to Cambridge, the UK's Innovation Corridor in the document

· There is a need for clearer guidance on the role of authorities outside of London in meeting shared challenges around housing delivery, infrastructure and industrial land

· There is a need for elaboration and advice on the delivery structures for enhanced cross boundary working between London and South East partners

· Our partners have concern over the achievability of housing targets given restrictions on SIL, Green Belt and the general viability of small site development

· Rigidity of SIL policy and lack of clarity about what constitutes suitable industry (i.e. clean vs. dirty industry) needs further elaboration within the plan

· Lack of focus on strategic road infrastructure and its role in the London and wider South East economy is and omission, particularly given its importance to some of our larger industrial areas (particularly in Enfield)

· West Anglia mainline four tracking should be given greater prominence given its role as a catalyst for Crossrail 2, growth and regeneration

User: South East England Councils

1.1 We respond on behalf of South East England Councils (SEEC), the cross-tier voice of local authorities in the South East of England. We are a voluntary membership body, bringing together county, unitary and district councils. Together we promote the views and interests of all tiers of local government across the South East, representing 9.1 million residents – the largest population in the UK.

1.2 SEEC members welcomed the opportunity to discuss key issues with you at the Wider South East (WSE) Summit on 26 January. This built on our constructive dialogue over last 18 months between SEEC and London Deputy Mayor Jules Pipe through the WSE Political Steering Group (PSG).

1.3 We warmly welcome your ambition in the draft London Plan to achieve a sustainable stepchange in growth, to deliver London's housing and other needs within your own boundaries. We also welcome the principle - in the spirit of our joint PSG engagement – of London working with councils in the South East, to deliver mutual benefits from growth and to secure investment and national policy changes needed to help both our areas.

1.4 However further clarity is needed in the next post-consultation iteration of the Plan on how aspects of these high-level aims will be delivered. If not addressed, these will leave uncertainty which could not only hinder delivery of your Plan, but also impact on the South East's own local growth plans. As SEEC has previously explained, whilst local circumstances vary, it cannot be assumed that South East authorities would be able to accommodate additional unmet housing needs from London. Many of our member authorities already have their own challenging growth pressures and constraints, as well as facing similar challenges as London in ensuring delivery of housing and securing infrastructure funding.

1.5 Our response below highlights the importance of sustaining the South East's success alongside London's. We welcome the direction, ambition and principles in the draft Plan, however there are 3 main proposals where more detail is required on how the Mayor plans to deliver his ambitions:

A) Aim to meet all London's housing within its boundaries. The Plan should include further information on how this 50% increase on current delivery will be achieved, how the 1,000 homes a year gap will be filled, and what happens after the Plan's initial 10-year targets.

B) A focus on only ‘willing partners’ outside London who might want to help accommodate some of London’s growth as ‘a prudent long term contingency’ if London cannot meet its housing needs. The Plan needs to specify how this will work in practice and the benefits that would accrue to South East councils as well as London.

C) Joint working on infrastructure. Further information is needed on how the Mayor can support the need for infrastructure investment required to underpin delivery of plans outside London. We would also welcome clear recognition that many of these investments are needed to support existing South East plans/priorities, not additional growth from London.

1.6 Our response explains these issues in more detail. Member councils will also respond.

User: L&Q

Producing an Effective Plan

Strategic Policy

The draft London Plan recognises that ‘the legislation stipulates the London Plan should only deal with things of strategic importance to Greater London’ (paragraph 0.04). The NPPF seeks plans to be ‘positively prepared’. The Plan should accordingly focus on strategic matters and setting a policy context which encourages development.

The draft London Plan expresses concern with how this strategic function has been interpreted with previous versions of the Plan which ‘read as sweeping statements of ambition rather than concrete plans for action’ (page 16), It advises that ‘this document places a specific focus on tangible policies and planning issues’ (page 16). Outcomes of this approach include policies addressing tangible matters such as basement development (Policy D9) or the provision of public toilets (Policy S6). The concern is that such additional policy could delay the delivery of development or discourage it coming forwards.

The focus of the next draft of the London Plan should be on matters that are unequivocally of ‘strategic importance to London’, such as addressing the ‘housing crisis’. This focus will enhance its effectiveness and its contribution towards positively encouraging development and helping decisions to be made more efficiently.

Deviating from National Planning Policy

The London Plan is explicit that ‘on some occasions, the Plan deviates from existing national policy and guidance; this is mainly where the Plan is delivering on a specific Mayoral commitment and reflects the particular circumstances of London’ (paragraph 0.0.20).

If the London Plan is to adopt this approach, then it must be explicit where such deviations exist and justify these through evidence. For example, the draft London Plan’s policy approach towards heritage assets deviates from national planning policy through language that either does or can be interpreted as setting a higher bar than the NPPF. It is not clear whether the Mayor acknowledges this.

As the Mayor is aware, for the London Plan to be found sound at examination it must be ‘consistent with national policy’. Deviations therefore risk the London Plan being found unsound and rejected at examination. Moreover, deviations such as that cited above risk delaying the delivery of development or discouraging it coming forwards.

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Explaining the intentions of Policy

The adopted London Plan distinguishes across its policies between ‘Strategic’ policy and policy which relates to ‘Planning decisions’ (it also refers to ‘LDF preparation’).

These distinctions do not appear in the draft London Plan. This aspect of the draft Plan should be retained. It helps to clarify where the plan does and does not refer to decisionmaking. Encouraging Development The Mayor of London and the public sector more generally can play a significant and direct role in delivering new development, including new homes. However, the ‘step change’ in delivery sought by the draft London Plan depends also on delivery from the private and not for profit sectors. It requires landowners to release land for development and (in most instances) developers (including housing associations) to pursue schemes. The London Plan cannot compel landowners or developers to pursue development.

A focus for the London Plan must therefore be encouraging development to come forwards, reducing the burdens and barriers to development and encouraging innovation. It should challenge homebuilders to build more. Simply put, the London Plan must make it more appealing for landowners in terms of risk/return to pursue development than to ‘do nothing’ or make less ambitious choices about how to use land.

For the London Plan this means revisiting draft policy so that it encourages landowners/developers to bring forwards schemes.

Recommendations are made throughout these representations.

Making Decisions More Efficiently

Planning policies must be clear and unambiguous if they are to help decision-makers both come to the appropriate decision and do so efficiently. The draft London Plan can be improved in this respect. An example is the reference across the draft London Plan to ‘character’ which sees this term given different meanings in different places.

Using the need to address the ‘housing crisis’ as a case study, reasons why clear guidance and policy are important for decision-making include:

? Planning Officers must be able to emphasise to Planning Committees the critical need for housing delivery and that this should be the primary consideration in exercising the planning balance;

? Councillors and the Mayor must be able to point to these matters when explaining to Londoners why decisions must be made;

? Planning Inspectors and the Secretary of State must be properly informed of the weight to be afforded to housing delivery when considering planning appeals; and

? robustly setting this out (the weight to be afforded) should make planning appeals for schemes involving new housing more likely to be allowed by Planning Inspectors or the Secretary of State. Every application approved at planning appeal has effectively seen households not housed for as long as that process lasted. It is imperative that more applications are approved and approved swiftly at the local level.

Overarching Strategic Representations

To achieve the twin objectives of i) encouraging development to come forward and ii) be granted planning permission efficiently the draft London Plan should address the following overarching points:

1. The London Plan should provide a presumption in favour of all residential development2 – There are concerns that housing need is underestimated, housing supply is overestimated and that housing delivery rates may be unachievable. Moreover, the supply of new homes identified in the draft London Plan is reliant upon ‘substantially… increasing the rate of housing delivery from small housing sites’ (paragraph 4.2.1). Whilst delivery from ‘small sites’ may be a ‘strategic priority’ (ibid), the referral criteria will almost always preclude the Mayor from directing the development of any new homes at such locations (or indeed many schemes smaller than 150 homes). This all requires honing in on how the detail of the Plan can be refined to deliver as many homes as feasible. Given the scale of London’s housing crisis the draft London Plan must emphasise that the delivery of new homes should be afforded significant weight when determining planning applications. In this context, the presumption in favour of residential development from some (but not all) ‘small sites’ should be universally extended to all sites. A presumption is important because it will elevate this matter as a planning consideration for the decision-maker.

2. The delivery of ‘genuinely affordable’ housing should be afforded significant weight as a material consideration in favour of a planning application3 – There is significant identified need for affordable housing. In view of this, where planning applications deliver affordable housing this should be identified as a significant consideration that weighs in favour of a planning application. The draft London Plan does not currently advise this. A presumption is again important because it will elevate this matter as a planning consideration for the decision-maker. In addition to the above, the London Plan should provide a concise definition of ‘genuinely affordable’ that can be straightforwardly cited by all, including Officers, decision-makers and Londoners. As it stands, that ‘genuinely affordable’ (a new term introduced by the Mayor of London) is not defined in a single place in the draft London Plan. This makes its meaning (and the change that the Mayor has introduced in this regard) harder to explain to Londoners.

3. The social, economic and environmental consequences of not meeting the housing crisis should be clearly set out in the London Plan - The draft London Plan recognises that there is a ‘housing crisis’. However, it does not set out the implications for London and Londoners if this crisis is not addressed. This could be described as a ‘Bad Growth’ scenario. The draft London Plan should contain a concise summary which can be straightforwardly understood by Londoners4 . This explanation should be set out firstly so that it can be readily understood by Londoners and secondly so that it can be straightforwardly cited as guidance for decision-makers.

4. The London Plan must focus on the delivery of affordable homes rather than what is secured by planning permission5 - National planning policy focuses on the delivery of homes (including affordable homes) rather than what is described in planning permissions. The London Plan monitoring targets should equally focus on delivery, not what planning permissions approve. A fundamental point is that the ratio of affordable homes delivered is not always defined by a planning permission. In practice, funding (including sources of grant) can be invested postpermission so that more homes are realised than the minimum number specified by a planning permission. The planning application stage should therefore be considered as the 'without grant' scenario. Discussions on grant at the application stage can delay the determination of planning applications and thus the delivery of homes. The draft London Plan should be revisited so that it does not seek any commitments regarding the use of grant funding to be made at the planning application stage.

5. More support should be provided for middle earners6 – Affordable housing Income thresholds should be revisited to help middle earning Londoners faced with the 'housing crisis'. In the first instance the household income cap for access to intermediate rent should be restored to £90,000.

6. Housing Associations must be able to compete on a level playing field7 – Planning law does not support any approach in which different standards are applied for different applicants at the application stage. Affordable housing providers (e.g. Housing Associations) should not be asked to make commitments that are not required of other applicants. On this point, the Draft London Plan, together with the Housing and Viability SPG), is unsound. L&Q and the GLA have underlined their commitment to work together in partnership to deliver homes and affordable homes in London through a new, well-funded Strategic Partnership. Through this partnership, L&Q is committed to delivering 60% of homes built as affordable, including London Affordable Rent, London Living Rent and Shared Ownership. This model allows the partnership to maximise delivery in the right locations across L&Qs ambitious home building programme, benefitting from both grant funding and crosssubsidisation gained from L&Q's own surplus and funding. It is clear, however, that schemes need to be delivered within a highly competitive open market, and therefore setting a higher bar for Housing Associations at the planning application stage is counter-productive and could potentially hinder, rather than aid, the delivery of the programme. L&Q feels very strongly that best means for guaranteeing delivery of its affordable homes programme is through the Strategic Partnership and funding agreement, and this is best kept separate from the planning regime The draft London Plan must be amended to clarify that affordable housing providers (e.g. Housing Associations) are not expected under the draft London Plan to achieve different levels of affordable housing delivery than other applicants on a site-by-site basis. The draft Plan must also be revised so that commitments regarding the investment of grant funding are not sought at the planning application stage. This is for the reasons outlined in our accompanying note.

7. The scale of the ‘housing crisis’ requires the managed release of protected land within London for new homes8 – In view of the above concerns regarding housing need, supply and delivery it is clear that the London Plan must conduct a housing delivery review to consider additional sources of supply. This review should include:

? the potential release for development for new homes of appropriate and sustainable land in the Green Belt or Metropolitan Open Land, particularly in areas where new transport infrastructure is being developed, whilst protecting land of higher ecological or agricultural value;

? the release of more land for new homes at appropriate industrial sites, especially where: o this land is set to benefit from ‘step change’ events such as Crossrail 2, development at Heathrow, the Bakerloo line extension and DLR extensions; and/or o where it can be demonstrated that proposals can deliver an appropriate living environment and will not prejudice the long-term functionality of the employment land. The London Plan must also provide a clear explanation of:

? how the Mayor intends to update or review the minimum housing targets beyond 2028/29;

? the targets London Boroughs should refer to in preparing their own development plan documents, as these must identify housing supply beyond 2028/29; and

? the circumstances (e.g. a failure to achieve delivery targets) that will trigger an early review of the Plan – this should be based on achievement against Key Performance Indicators to be set out in Table 12.1 of the Plan.

As things stand the insufficient supply of land for new housing constrains delivery and reduces the affordability of build for sale or build for rent housing. It also increases land values, with the lack of supply raising the market cost of land available for development for new homes. This is notwithstanding the attentions of the Mayor to influence the price of land through planning policy.

8. The Mayor must also engage with local planning authorities in the South-East of England to identify sources of housing supply that can contribute to address London’s needs – In view of the concerns that housing need is underestimated, housing supply is overestimated and that housing delivery rates may be unachievable we recommend the draft London Plan should, through working with local authorities outside London:

? identify willing partners that can help meet the significant shortfall in meeting London’s housing needs; and

? identify growth locations beyond London where there is a realistic prospect that growth will be secured. The Mayor should also be lobbying government to introduce a more powerful replacement to the Duty to Cooperate.

9. The London Plan must be clear in what ‘Good Growth’ will involve – The imperative to optimise development potential will mean development taking place at a scale that may feel unfamiliar to some local communities. The London Plan must be clear about this for the benefit of Londoners and decision-makers. This involves providing clarity about implications in terms of density and building heights. In this respect the ‘density matrix’ has provided a useful baseline. It should be retained but substantively revised to reflect the density levels required in order to meet housing need, especially at more suburban locations. If roughly half of referable schemes have typically exceeded the current matrix this is because there was a site-specific case for this. A revised matrix should accordingly draw from case studies in situ. The ranges will inevitably be revised upwards and so the previously identified minimums will increase. Explaining the implications of ‘Good Growth’ also means providing clarity about terms used in the draft London Plan. It is particularly important that the next draft of the London Plan is clear about what is meant by ‘character’. The current draft ascribes different meanings in different sections. This leads to a risk that decision-makers find it harder to justify a resolution to grant planning permission in circumstances where consultees assert harm to a peculiar and subjective definition of ‘character’. It is essential that the meaning of ‘character’ is addressed for the London Plan to encourage development and help decisions to be made more efficiently. This will almost certainly require the use of different terms across the Plan (e.g. ‘physical character’ or ‘cultural character’).

10. The London Plan must provide more confidence to applicants where development relies on infrastructural capacity – We support the draft London Plan’s objective that infrastructural improvements (e.g. Bakerloo line extension) should be used to support the delivery of new development (especially homes). However, the draft London Plan must provide more confidence to applicants to pursue schemes where funding for such infrastructural improvements is not guaranteed. This requires a funded Infrastructure Plan which directly cross-refers to housing delivery. In effect, the draft London Plan anticipates phased planning applications with latter phases being developable after infrastructural capacity is realised. This could involve a considerable time-lag. If the draft London Plan maintains this position, then it is critical that each phase is viable in its own terms and can take account of the possibility that infrastructure improvements may not actually happen or are significantly delayed. Given the upfront costs involved in pursuing schemes then this is very likely to mean recognising that public benefits will be disproportionately delivered in later phases.

Summary

In summary, we are concerned that the draft London Plan does not yet provide the best prospects for achieving its objectives, including to deliver ‘Good Growth’, ‘build a city that works for all Londoners’ and address London’s ‘housing crisis’. We trust that these representations will help the Mayor refine the next draft of the London Plan. Given its early stage in the plan-making process, we advise the Mayor should not refer to the draft Local Plan policies until its adoption. I trust the above representation is helpful and will be given due consideration. If you require further information or clarification please do not hesitate to contact me

User: Wimbledon East Hillside Residents' Association

It is clear this document has 'grand vision' - and yes, any plan needs big, wide vision. This document is quite naiive in our view, because it does not allow for **scenario planning**, as we leave the European Union, as the world is turning to environmental concerns (the 'new terrorists' are mostly white collar people - those that continue to ravage the planet and its finite, precious resources: air and water). The National interest is swiftly shifting from a London-centric economy/focus to a more German SME model, with many important cities and regions, many mid-sized businesses, not just one big city with its own DNA focussed on all things financial: making money from money. Just look at the papers and social media every day, talking about *'should I stay in London or should I go?'* You cannot ignore that London may have reached peak human occupancy levels, and perhaps it should accept that, at least for one of likely scenarios in drafting this new Plan.

The problem with the proposals is, they are at their heart, not sustainable. Humans are creative individuals, they need - most importantly - a warm bed, clean air and drinking water to live, and they need to live in humane social conditions. London is headed in a direction that will be unable to provide these basic life-giving things to survive an increasingly unpredictable future.

User: Wimbledon East Hillside Residents' Association

The draft Plan describes how we will have to sacrifice 'local character' in order to achieve these ambitious build targets. Local character is what defines us as individuals, and that is like saying you will tell us next time how cut our hair, or how to dress. This is a poor rationale and unacceptable.

We urge the authors to re-think this entire section, including three basic scenarios: yes, you can keep your naive proposals as one of them. The second scenario would be that London has reached 'peak density for London - and all that London stands for' and that your projections are reduced to zero housing needs, assuming people are no longer rushing to come to London to live/work. The third scenario is that central London's population begins to shrink. From what we read, this is a very real possibility. The northern cities, the southwest, Dundee and Margate (!)are all being touted as great places to go instead of London to live, work, or start up a new business. Rather than try to force the market to behave to benefit LONDON, you need to consider the requirement for a SUSTAINBLE FUTURE for the UK, and that may entail **reducing** London's presence in proportion to the rest of the country.

User: Wimbledon East Hillside Residents' Association

For Merton Specifically: Wimbledon town needs to be high quality offices, small upmarket corporate HQs and performance venues, shops and related businesses that complement the broad positioning as a place for ***Creative and Performing Arts & Education/Lifelong Learning and good Health and Well-being***. Wimbledon is an historic, heritage-rich place on the world stage. It is generally upmarket, well connected literally (public transport) and socially, environmentally. Wimbledon is a successful, thriving community that provides - and has provided over many centuries - social, cultural and environmental initiatives that are shared generously with the whole Borough, with wider London, the UK and the world. We must allow the London Plan to dilute or diminish this ***core positioning. What Wimbledon is, what it stands for,*** has developed organically, without any political or outside outside influence. Let's not break what doesn't need fixing.

User: WeAreWaterloo Business Improvement District

Neighbourhood Planning

We Are Waterloo believes that the Draft New London Plan gives little to no recognition to neighbourhood planning as an established and statutory part of London's planning system. As such, it is considered that the Draft New London Plan has missed a major opportunity to highlight the role of neighbourhood planning, and promote neighbourhood planning as route to achieving desired outcomes for smaller areas, and managing development at a microscale.

As the first London Plan to be prepared since the three tier development plan system was adopted in the capital, it is considered the Draft New London Plan presents a significant opportunity to harness the role of neighbourhood planning to support and deliver on its strategic objectives. It is concerning to note that the Draft New London Plan remains almost completely silent on neighbourhood planning. Apart from two brief statements in 'Introducing the Plan' (Paragraph 0.0.9) and Chapter 1 'Planning London's Future' (Paragraph 1.1.5), and the inclusion of neighbourhood plans in the definition of 'Development Plan', the Draft New London Plan says very little to support or promote the important role of neighbourhood planning in the statutory planning system.

It is considered that the introductory chapter of the Draft New London Plan must be re-drafted to more accurately identify and reflect the statutory role of Neighbourhood Planning, as identified under the National Planning Policy Framework 2012 and the Neighbourhood Planning Regulations 2012.

Furthermore, it is considered that there is an opportunity to highlight the role Neighbourhood Planning can play under specific policies of the Draft New London Plan. In particular, policies relating to Design, Housing, Social Infrastructure, Economy and Heritage and Culture could all benefit from further emphasis being placed on how neighbourhood planning can help deliver better local outcomes for London.

Without including a stronger emphasis on Neighbourhood Planning, We Are Waterloo considers that the Draft New London Plan may be legally 'not sound' due to its lack of acknowledgment of National Planning Policy Framework 2012 requirements placed on local planning authorities in relation to neighbourhood planning

User: National Custom and Self Build Association

Additional Proposals

In 2012, London sought to lead support for custom and self build through Build Your Own Home – The London Way. Whilst the scheme provided important recognition to the sector, without the Right to Build opportunities to access the funds proved limited and the scheme failed to become established.

NaCSBA believes that the time is now right to relaunch and rebrand a specific custom and self build development fund for London.

User: Local London Partnership

London Plan Consultation Process

In relation to the overall London Plan process, whilst we recognise there is only one formal stage of consultation prior to the Examination in Public taking place. Local London is concerned that there is not a further opportunity in the timescale set by the Mayor to discuss in detail our comments and concerns prior to formal Examination. The Plan is a significant step change from the current Plan in terms both of the scale of the projected growth, particularly in housing, and in the spatial pattern of development proposed which will have significant impacts of the character and quality of Outer London suburban areas and also some urban ones, particularly through the impact of the small sites policy. We are mindful that boroughs were not offered the same detailed level consultation on the methodology for the allocation of small site housing growth as with the SHAMA approach to larger sites. It is an approach that has not been fully tested and scrutinised by the boroughs which have the expertise and local understanding of their areas to assist the Mayor in making informed and robust decisions about the potential of the small sites approach to meeting housing need. Our concern is that the approach set out may be unrealistic and undeliverable. Our view is that it would be helpful to have a further round of consultation, particularly with regard to the methodology used to identify the housing supply target for small sites, with boroughs prior to the EIP to ensure the fitness of the Plan. We look forward to discussing these key issues and working in partnership with Mayor to achieve ‘Good Growth’.

User: Socialist Health Association London

Introduction

We very much approve of the aim of the New London Plan to plan for ‘good growth’ on the basis of a potential to improve the health and quality of life of all Londoners, to reduce inequalities and to make the city a better place to live, work and visit.

However we are disappointed that the several hundred members of the Socialist Health Assoc London were not approached as an entity for our response or input into this document before it went out. The fact that health is a stated overall aim is to be applauded, but we are perplexed that the significant knowledge and skills base of our membership has not been approached for input.

We therefore offer this paper, which we have also submitted under the key headings to the online response to offer expert opinion, both on the matters which have been included and also those which have not.

We specify our input to a Healthy London under the following areas :

Sufficient services and infrastructure to meet a growing population

Emergency services

Public health

BAME health

Mental health and wellbeing

Sexual health

Access to healthy housing

Clean air and Green spaces

Creating an accessible city

Land planning and use of NHS assets

Key Performance Indicators

Following meeting of London branch of SHA February 21st.

General comments

Such a lengthy planned period for London (2018-2041) offers an invaluable opportunity, amongst other things, to address those issues underpinning positive health and disease, unlike current NHS planning periods eg Five Years Forward View.

For example, the emphasis for positive health allowed for by a 2 generation planning cycle allows for planning to concentrate on addressing social and therefore health inequalities, more investment in opportunities for children growing up in nutrition, education, and sustainable and diverse employment, transport, housing and leisure.

The original plans of the SHA agreed by the Labour Party pre the Second World War and forming the basis of the NHS post war, included a health service founded on prevention of disease and a national occupational health service- ie a service to protect people from the ill effects of work. It would be useful for these two principles underpinning an NHS to be stated in the plan as they often seem to be forgotten.

With such a rapid pace of global change, and considerable changes predicted due to Brexit, the predictive power of the document is relatively weak. Also, a plan which concedes such a massive financial gap in the plan, at best suggests the plan may be “pie in the sky” and at worst puts London on a drive to raise cash by selling off the London public estate and to be “wide open” to businesses seeking to exploit it for profit, not for the benefit of London and the UK, and as an important World capital, in service of the World.

Overall, with a Labour London Mayor we feel that this should more obviously be a Labour London Plan.

Borrowing to invest for infrastructure in line with Labours financial plans is appropriate given the popularity of those policies at the last election. Models of cooperative ownership and nationalisation of industry, community provision transport and energy supply should be emphasised. Poverty and the impact of social inequality on health should be highlighted and the actual declines in life expectancy now being noted in the country make it legitimate to talk about a Health Emergency.

Coming on to health specifically, as well as pointing out the impact on health of broad factors covered by the plan, the small section on health needs to be addressed, in a large plan.

Primary Aim : REDUCING HEALTH INQUALITIES

Rather than a focus on cutting services, London needs a targeted improving health plan to tackle health inequalities in our city.

User: Highams Park Planning Group

DEVELOPER CONTRIBUTIONS (DCO)

One of the key aims of this Plan is to ensure that development in the Area brings clear benefits to the local community. During consultations, HPPG found that many residents would like it made easier to see how planning agreements (such as section 106 agreements) drawn up between the Council and developers will be used to benefit the Area. This Plan sets out proposals for a far more open, transparent and accountable process for allocating the funds payable to the community from new developments in the Area.

The NPPF (175) says the Community Infrastructure Levy (CIL) should “place control over a meaningful proportion of the funds raised with the neighbourhoods where development takes place”. In areas with approved Neighbourhood Plans, the government has specified that a minimum of 25% of CIL money should be spent in the neighbourhood plan areas. This Plan strongly supports this measure and urges the Council to use this Plan as the basis for allocating CIL money in this Area.

Through local consultation and engagement, HPPG has identified a series of measures and aspirations which would benefit from CIL funding. The list below sets out the main priority areas for such spending. These projects and schemes - as identified in Annex 1 to this should be the main recipients of planning gain monies (such as S106 agreements, CIL, and any other such schemes) in the Area:

POLICY DCO1: Developer Contributions

i. Any developer contribution secured against development in the Area should, where possible, be allocated to projects within the Area which mitigate the impact of development and, where appropriate, in support of Community Facilities included in the list in Section 5 within the Highams Park Plan Area.
ii. Irrespective of the adoption of a S123 list within Waltham Forest, funds collected under the provisions of the Community Infrastructure Levy (CIL) should be expended in support of the schemes which are listed in this Section 6 and in Annex 1.
iii. Ring-fenced upfront sums should be paid to the Council for maintenance of any landscaping in the public realm created by development.

User: Highams Park Planning Group

OTHER PLANS & ADDITIONAL INFORMATION

The National Planning Policy Framework (March 2012) sets out the government's planning policies for England and provides "a framework within which local people can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities". The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development, taking economic, social and environmental factors into account. The NPPF says neighbourhoods should develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development and "plan positively to support local development". The NPPF says neighbourhood planning "provides a powerful set of tools for local people to ensure that they get the right types of development for their community" and that neighbourhood plans "will be able to shape and direct sustainable development in their area".

The London Plan is "the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years". The Plan sets out six objectives (1.53) for the sustainable development of London:

? A city that meets the challenges of economic and population growth.
? An internationally competitive and successful city, with a strong and diverse economy.
? A city of diverse, strong, secure and accessible neighbourhoods.
? A city that delights the senses and takes care of its buildings and streets.
? A city that becomes a world leader in improving the environment, locally and globally.
? A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities.

However, the Plan notes (1.44) "a perceived tension between the demands of growth and the conditions for a good – and improving – quality of life, and a concern about the loss of things that have made living in London and its neighbourhoods a distinctive experience". The Plan highlights a number of 'quality of life' issues, such as: ensuring there are enough homes meeting the needs of Londoners at different stages of their lives; protecting and improving London's natural environment and habitats; ensuring a network of vibrant and exciting town centres with a range of shops and other facilities; providing adequate, efficient transports networks, and support for cycling and walking; and the importance of a range of readily accessible community and cultural facilities.

The Council’s Core Strategy is the central part of the Local Development Framework for the borough, covering the period 2013-2028. The Council’s Core Strategy (WFCS) covers the physical aspects of location and land use but also addresses other factors that make places attractive, sustainable and successful, such as social and economic matters. It plays a key part in shaping the kind of place Waltham Forest will be in the future, balancing the needs of residents, businesses and future generations.

The Future of the Plan

The HPPG was concerned that because of the range of developments proposed for the Area the NDP could soon become out of date. The HPPG has sought, where possible, to make sure that the Plan is both relevant at the time of writing and in future years. The NPPF states as a core planning principle (17) that “plans should be kept up-to-date”. The HPPG would like to have the option to review and amend the NDP in the future as circumstances change. The HPPG suggests the Plan is regularly reviewed to reflect changing circumstances and developments.

User: 4 Estates Forum

4 Estates Forum: summary of objection

The 4 Estates Forum is made up of elected representatives of residents from One Housing Group's (OHG) 2,027 homes on four estates on the Isle of Dogs, (Barkantine, Kingsbridge, Samuda, and St Johns).

We object to the London Plan and request to attend the Examination in Public. Our objection is on the grounds that the Plan's housing target for the Isle of Dogs and South Poplar Opportunity Area (OA) is partly based on assumptions for net additional units which could only be built after the demolition of many of our homes. We believe that the draft London Plan as it stands contravenes planning guidance and principles in two main ways:

a) *The GLA's Strategic Land Availability Assessment (SHLAA)*: the principle that the element of a GLA housing target for an area that is assumed to come from estate 'redevelopments' should not influence future planning decisions in individual cases.

b) *The Mayor of London's draft Best Practice Guide to Estate Regeneration*: the guidance that estates should only be redeveloped with residents' support. Proposals, which may include the redevelopment our estates, are at an early stage. Results of a stock condition survey won't be published until February 2018. The next stage will be option appraisal, which will take several months, only then could resident support be assessed. These housing targets are premature.

c) Any planning housing target that assumes net additional units based on the demolition of homes before resident consultation has even started risks unduly influencing the future planning decision, and undermining residents' confidence that a consultation process is genuinely open to options that don't demolish their homes. That isn't in anyone's interests: residents', OHG's, or the GLA's.

We would like to attend the Examination in Public because we need answers to several questions concerning how the OA housing target has been arrived at. Specifically the GLA needs to demonstrate how London Plan housing targets for the Isle of Dogs and South Poplar Opportunity Area can be delivered without demolishing any homes on our estates. The OA's housing target (of 29,000 net additional units) in the draft London Plan, (which we assume is based on the still unpublished OAPF), has a much higher target for new housing from our area than the Tower Hamlets Local Plan. We are concerned that a significant portion of the London Plan's 'extra' units are predicated on the demolition and 'redevelopment' of our estates and we strongly object to this.

User:	S Horne
More population = more pollution of all kinds, more cruelty to farm animals, too much concrete. England would be ruined. Halal is an example of great cruelty.	

User:	S Horne

Due to rises in Crime Rate & not enough police officers employed to investigate some crimes, government needs no increase in population. Government needs to keep up numbers in the police forces to protect the public by funding the police services adequately.

User: Aberfeldy New Village LLP

Introduction

Aberfeldy New Village LLP welcome the opportunity to comment on the draft London Plan ("draft Plan") and we set out below what we consider to be constructive comments on the draft document that we hope will be taken on board. In our view, these are important to our ongoing regeneration work at the Aberfeldy Estate in Tower Hamlets.

Overall, we support the ambition to substantially increase housing delivery through 'good growth' and welcome the GLA's continuing commitment to keeping the London Plan regularly updated. This is essential to ensuring that the Plan remains relevant in addressing the challenges facing London and is capable of taking advantage of emerging opportunities. We agree that it is necessary to rigorously and forensically examine potential new sources of supply to ensure that the current substantial shortfall between housing completions and housing need can be closed.

Outline planning permission for the Aberfeldy New Village was granted in 2012 for up to 1,176 new homes. Since planning permission was granted, development has proceeded quickly with phases one and two (561 new homes) already complete and with phase three (344 new homes) under construction. The New Village has already provided substantial new homes and we have ambitious plans for additional new homes on the remainder of the site. Aberfeldy is within the Poplar Riverside Housing Zone (designated in 2015) and in the proposed Opportunity Area within the draft Plan. We therefore welcome the draft Plan's focus on increasing density through more efficient use of brownfield sites.

The proposed housing requirement represents a significant increase upon the current minimum target and is substantially above current completion levels, seeking a major step change in delivery over the next 10 years. It is rightly ambitious and we agree that it is necessary to rigorously and forensically examine potential new sources of supply to ensure that the current substantial shortfall between housing completions and housing need can be closed.

To deliver this vision additional housing supply will need to be identified, and crucially developed quickly. We consider that sites with existing planning permissions could play an important role in realising this vision as many already have developers on site and so revisions to the planning permissions and any associated uplift in housing can be delivered quickly. While we agree with the broad spatial strategy set out in the draft Plan, itis crucial that this is matched by a suite of policies which will be effective in delivering this planned growth.

Delivery is central to the planning system, and the NPPF (para. 173) sets out clear guidance on it

"Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened."

In our view the policies of the draft Plan, taken together with the draft charging schedule for MCIL2, further add to the burdens that are already faced by the industry in bringing forward development and brownfield sites. Neither has been devised, in our view, with a robust evidence base on viability (the draft Plan and the draft Charging Schedule each have been tested separately and on a different basis for viability).We consider that changes are necessary to ensure that the draft Plan facilitates the desired uplift in delivery on sites across the capital, especially those well placed to deliver in the short term.

Review of Policies

We comment on specific policies in the following sections. Section 41 of the GLA Act states that the London Plan should be consistent with national policy and we note that the Inspector of the FALP made clear that while the London Plan is not a Local Plan it was it reasonable and appropriate to apply the soundness tests of paragraph 182 of the NPPF. We consider that this approach remains appropriate to the examination of the draft Plan and assess the draft policies against this.

User: Aitch Group

General Comments

We welcome the Draft London Plan's objective to pursue 'Good Growth' and 'build a city that works for all Londoners'.

We particularly welcome the Draft London Plan's acknowledgement that there is a 'housing crisis'. This can be defined by current annual rates of housing delivery addressing less than half of identified need.

The scale of activity (especially the 'step change' in housing delivery) sought in response by the Draft London Plan is going to mean much change across London. This may feel unfamiliar to some local communities. It is therefore crucial that the London Plan is clear to London Boroughs and Londoners about why such schemes are coming forward and should be granted planning permission.

For the London Plan, this means revisiting draft policy so that it encourages landowners/developers to bring forwards schemes.

Summary

While many of the objectives of the plan can be supported in principle, there are significant differences between the draft London Plan and the Council's adopted Growth Strategy. The emphasis in both documents is to maximise development sites in sustainable locations, however the draft London Plan seeks to protect and restrict certain areas from redevelopment.

Bexley's adopted Growth Strategy was informed by a thorough and extensive local evidence base determining the most sustainable areas for growth. Elements of the draft London Plan are too prescriptive and therefore undermine the work carried out by the borough to come to their conclusions, identifying locations for good growth. The draft London Plan should provide Local Planning Authorities with an opportunity to defer from policy where sufficient and robust evidence can be provided to demonstrate that deviating from policy can still result in good, sustainable growth and contribute to the housing delivery targets.

We trust that these representations will help the Mayor refine the next draft of the London Plan and we look forward to engaging with the Mayor and his team at City Hall throughout the plan adoption process.

If there is anything that Officers would like to discuss, please do not hesitate to contact us at these offices.

User: London and Continental Railways

Background

LCR is a Department for Transport-owned property and regeneration company, whose primary focus is in the area of property development and land regeneration, in order to deliver jobs, homes and economic growth. LCR has prepared separate representations to the draft London Plan in relation to its wide-ranging London property portfolio. The comments set out within this letter relate specifically to LCR's 'Chobham Farm – Zone 5' site, which is bounded by Liberty Bridge Road to the south, the railway to the west, and the gas depot (Air Liquide) and Nangrecha Bros' sites along its north/east borders, falling within the London Legacy Development Corporation's (LLDC) area.

The historic use of the site was as rail sidings with no associated employment-generating uses. It now forms part of the wider Chobham Farm site ('Zones' 1 to 5) which is subject of an extant LLDC planning permission ref. 12/00146/FUM. This comprises full planning permission for Zone 1 (delivering 173 residential units and 1,161sqm of commercial floorspace) and outline permission for up to 863 residential units and 6,900sqm of commercial floorspace within Zones 2-5 (including 2,000sqm of B1/A2 flexible meanwhile uses in Zone 5). The Zone 5 part of the overall site remains vacant and undeveloped at the current time.

To confirm, as part of the LLDC's Local Plan Review and its Call for Sites, we have submitted representations on behalf of LCR setting out our client's view that the site bound by Liberty Bridge Road, Leyton Road, Temple Mills Lane and the railway (i.e. Zone 5 and its immediately adjoining land parcels) provides significant potential to contribute towards meeting the LLDC's pressing and increased housing requirement. The site could also contribute to the strategic policy objectives for the Chobham neighbourhood, with a residential-led, mixed-use development that would more positively contribute to the key gateway into Stratford City from Leyton. We have therefore requested for our client that this land forms a new residential-led site allocation in the reviewed Local Plan, to be delivered as a priority over the plan period. This form of development would reflect the Mayor's strategic direction in the draft London Plan to utilise all sites appropriate for housing, would complement the residential neighbourhood at Chobham Farm Zones 1-4 and help create the family neighbourhood envisaged in the Olympic Legacy SPG. This background forms important context to the representations to the draft London Plan set out below.

User: BA Pension Trustees, Nationwide Pension Fund Trustee & National Grid UK Pension

Thank you for the opportunity to engage with the preparation of the Mayor's London Plan. This representation has been prepared by Savills (UK) Limited on behalf of a consortium of landowners comprising British Airways Pension Trustees Ltd, Nationwide Pension Fund Trustee Ltd and National Grid UK Pension Scheme (the consortium). It is made in respect of the Draft London Plan 2017 document (Draft London Plan) published by the Greater London Authority (GLA).

The consortium control a substantial area of land within the Upper Lee Valley that has the potential to play a significant role in the future delivery of London's growth aspirations. Located within an Opportunity Area (OA) and close to a future Crossrail 2 station the land is designated as Strategic Industrial Land (SIL). Due to commercial reasons they are unable to provide further details of the site at this stage. Their ambition is to intensify the use of this well-located industrial land without compromising its ability to meet the economic needs of the City. The consortiums overarching brief is to ensure that the industrial capacity of the site is maintained as this value underpins the value of the asset. At the same time they are seeking to realise the full potential of its location to create a new neighbourhood centre that delivers a substantial number of new homes.

These representations are made against this context with specific regard to the consolidation of industrial land to maintain a sufficient supply of land and premises for industry whilst enabling the delivery of homes. We have
focussed only on those areas of the Draft London Plan that are of particular relevance to this topic and where we can make constructive suggestions to assist with the preparation of a London Plan that is positively prepared
to meet the objectives, principles and policies of the NPPF. We are mindful that the NPPF is currently under review and reserve our position to modify these representations in light of any changes to the NPPF.

The main point of these representations with the respect to the Draft London Plan are:

? Support the principle of no overall net loss of industrial floorspace capacity across London in designated SIL and LSIS, provided that the processes of intensification, co-location and substitution set out in the Draft London Plan are effective at protecting industrial capacity whilst enabling the delivery of new homes.

? By increasing the affordable housing threshold to 50% on development that delivers housing through these processes, the Draft London Plan is constraining development where it should be encouraging it.

? Consolidation of industrial land will in most cases require high density development and it is important that the design policies in the Draft London Plan support this.

User: BA Pension Trustees, Nationwide Pension Fund Trustee & National Grid UK Pension

Overall approach

The consortium welcome the recognition that industry and logistics play a vital role in the effective functioning of London's economy. Recent studies have shown that London has been losing industrial land at a much faster rate than allowed for in the current London Plan. This has led to concerns that if London continues to lose industrial land, even at the benchmark rate, the lack of availability will be a constraint on its economic growth.

As such the consortium broadly support the principle of no overall net loss of industrial floorspace capacity across London in designated SIL and LSIS, provided that the processes of intensification, co-location and substitution set out in the Draft London Plan are effective at protecting industrial capacity whilst enabling the delivery of new homes.

The consortium support the Good Growth principle of making the most efficient use of land by optimising density, which is a thread that runs through the Draft London Plan. They welcome the recognition that good design plays a key role in making the most efficient use of land by optimising density. Consolidation of industrial land will in most cases require high density development and it is important that the design policies in the Draft London Plan support this. We have suggested modifications where we consider that the design policies can be more effective at delivering high quality design that makes best use of land (see Appendix 2).

User: F&C UK Property Fund ICVC

Current Context

The draft New London Plan runs from 2019 to 2041 and therefore it is vitally important for it to facilitate a range of development opportunities that are likely to come forward over the medium and longer term including sites such as 117 North Street. Our client's site comprises a single storey retail unit of approximately 3,700 sqm GIA with associated parking.

Within the adopted development plan the site is on the edge of Romford Metropolitan Centre (as defined in retail terms) but within the Romford Metropolitan Centre boundary (Romford Area Action Plan boundary (2008)) that is defined in the LB Havering Proposals Map 2008.

The Romford Area Action Plan 2008 (RAAP) states that Romford will contribute to the Borough's housing target through encouraging the intensification of single use sites including Matalan (117 North Street- our client's site), to provide residential units through mixed use development (Policy ROM14- Housing Supply). The supporting text (para. 1.4) states that the Council welcomes proposals to secure new housing on these sites through mixed use redevelopment.

More recently the site is identified within the Romford Strategic Development Area within the Havering Local Plan 2016- 2031 Proposed Submission Version. Specifically, Policy 1in the emerging Local Plan identifies that *"over the plan period the Council will support the delivery of over 5,300 (2) new high quality homes in well managed residential and mixed use schemes."*

The potential redevelopment/intensification of the site has therefore been recognised by LB Havering in both adopted and emerging development plan policy.

Further to this policy endorsement, it should be noted that the adopted and emerging Local Plans were based on a much lower Borough housing target than proposed in the draft New London Plan. Specifically, the LB Havering Core Strategy and RAAP (2008) responds to a need of (535 new homes per year) whilst within the emerging Local Plan the target is a minimum of 11,701 new homes over the period 2015-2025 (ie an annual average of 1,170 homes per year). The draft New London Plan proposes a housing target of 18,750 dwellings between 2019j2o- 2028j29 in LB Havering- i.e.an average of 1,875 per annum, equating to more than a threefold increase from that underpinning the 2008 RAAP Allocation.

This further emphasises the important role that a residential development on the site can make in helping to meet housing need within Havering and London generally - indeed the emerging Local Plan recognises the importance of such residential schemes within the Romford Strategic Development Area even prior to the increased housing need in the Borough identified in the Draft New London Plan.

User: Unknown

Paragraph 182 of the NPPF sets out the ‘soundness test’ criteria for Local Plans. For the above reasons, we consider that the DLP in its current form is not legally compliant or sound, which is a requirement under this paragraph:

Positive prepared – we do not dispute that the DLP is an ambitious plan, but are unconvinced that its housing targets are deliverable given the significant reliance on the development of unidentified small sites, which does not appear evidenced or the subject of consultation with the Boroughs;

Justified – our limited findings suggest that the DLP is not based on sufficient evidence. Reliance on the delivery of small sites will only increase should the identified large development sites not come forward at the rate expected, or at all. The reliance on many of the infrastructure improvements is unjustified given that they are not committed to financially;

Effective – the DLP relies heavily on cooperation with authorities beyond London to ensure development needs are met. For reasons already stated, CBRE does not consider the plan is deliverable;

Consistent with national policy – by its own admission, the DLP does not comply with national policy and we have highlighted two specific examples in respect of Green Belt boundary reviews and the lack of evidence to support the significant reliance of windfall sites on meeting London’s housing needs.

To address the matters raised above CBRE consider the following is necessary:

1. The publication of evidence to justify the reliance on the delivery of such a high proportion of housing on small unidentified sites, including evidence of past-delivery as required by the NPPF;
2. Evidence of cooperation with the London Boroughs on the decision to include such high housing targets for small sites;
3. The identification of an appropriate additional number of large strategic sites that could deliver the necessary infrastructure on site to support high density housing schemes and reduce the contribution of small housing sites on meeting London's housing needs;
4. Confirmation of the implications of adopting these housing targets on the status of Borough plans and whether these would be deemed out of date if a 5YHLS cannot be demonstrated;
5. A London-wide Green Belt study.

User: Tesco Stores Ltd

1. Introduction

1.1. These representations have been prepared and submitted by Savills on behalf of Tesco Stores Limited in response to the Mayor's Draft London Plan (The Spatial Development Strategy for Greater London) (December 2017). They are supported with input from Gerald Eve and Markides Associates who have considered the viability and transport matters. Together this work represents Tesco's full response to the consultation.

1.2. Tesco is a major employer and provider of high quality convenience and comparison goods across the UK. It has stores located throughout London and it is keen to retain its presence across the city as a high quality retailer. Tesco controls a substantial portfolio of land in the Greater London Authority (GLA) area, some of which is freehold and some leasehold. Together, it has the potential to play a significant part in the delivery of London's growth aspirations, including housing and employment as well as supporting strategic infrastructure.

1.3. Initial feasibility work suggests that the assets could deliver in the region of 10,000 new homes and most of the sites have been identified as part of the GLA's call for sites process. If realised, this is a significant contribution to the pressing housing need in London. Tesco support the ambition to deliver significantly more homes in London than have been delivered in the recent past and can make an important contribution towards this goal.

1.4. Tesco will seek to maximise delivery of genuinely affordable homes on their schemes. However, the Draft London Plan should recognise that existing retail food stores are a particular asset class with unique costs and challenges to be taken into consideration.

1.5. These representations are made with specific regard to the redevelopment of these assets to support the Mayor's vision for London. We have only identified those parts of the Draft London Plan where we have major concerns and where we can suggest positive changes.

The main points of these representations with respect to the Draft London Plan are as follows:

i. Tesco's reservoir of existing foodstore sites could help the much needed requirement for more homes in London and there are considered to be 3 policies which require amendment specifically to reflect and encourage this.

ii. Viability appraisal undertaken on existing foodstore sites should reflect the fact that these are valuable existing commercial businesses with specific associated costs, namely:

• high existing use values/benchmark land values of existing supermarkets;

• the costs associated with the interruption of trade for the foodstore;

• the particular costs associated with the need to provide a temporary retail store whilst redevelopment takes place.

iii. The redevelopment of existing foodstore sites to bring forward housing needs to reflect the fact that such schemes are unlikely to come forward unless viable both in housing and retail terms. The Draft London Plan should enable sufficient parking to be re-provided to ensure the commercial viability of the replacement store.

User:	Alex Page

I believe that everyone in London has the right to breathe clean air, have access to nature and to benefit from clean energy. I am therefore pleased to see policies in the new London Plan which seek to address these important environmental issues. These include policies to protect our Greenbelt and Metropolitan Open Land, a ban on fracking, and a commitment to London becoming zero carbon.

User: Chessington World of Adventures

Executive Summary

The key points that are raised in this representation are as follows:

1 Consistency with National Policy

The draft London Plan should be consistent with national policy, in accordance with the requirements of The Greater London Authority Act (1999) (as amended).

3 Visitor Infrastructure

The strengthening of London's visitor economy, and the enhancement and extension of its attractions, is supported, along with the recognised need to develop visitor accommodation. The draft London Plan should include specific reference to promoting the provision of serviced visitor accommodation at existing visitor destinations to meet growing demand.

Representations to the draft London Plan

It is vital to the future of CWoAR that the draft London Plan, when published, does not stifle the investment needed to maintain and grow visitor numbers, and sustain CWoAR's competitiveness in the leisure destination market. Given the Green Belt location of the Resort, it is particularly important that policy tests for proposed development in the Green Belt are not tightened beyond national planning policy for the Green Belt.

User: Battersea Project Land Company Limited

Representations on behalf of the owners of Battersea Power Station

We write on behalf of our client, Battersea Project Land Company Limited (‘BPLC’), to submit representations to the above consultation for your consideration.

BPLC is currently delivering the redevelopment of Battersea Power Station and surrounding sites, to create a new sustainable town centre for LB Wandsworth in the CAZ. When it is complete, the BPS masterplan will have provided commercial floorspace to support 17,000 permanent jobs, including 150,000sq m of Grade A offices, 75,000sq m of retail and cafes/restaurants, hotels and leisure space and a major new entertainment venue, as well as more than 4,000 new homes. It represents a significant investment into the London economy, driving the delivery of the Vauxhall, Nine Elms and Battersea Opportunity Area (‘VNEB OA’) through a contribution of approximately £245m to fund local and strategic transport infrastructure. This sum is principally to fund the Northern Line Extension (‘NLE’), which BPLC are accommodating on site, but approximately £10m is also being contributed to Crossrail 1 through MCIL1, despite this not being in place when the masterplan was originally
granted planning permission in 2011.

In addition to the masterplan, BPLC’s development manager BPSDC also acts as development manager for the Cringle Dock Waste Transfer Station (‘WTS’), alongside the site’s owners Western Riverside Waste Authority. Planning permission has been granted for the redevelopment of the site to provide a new WTS with enabling development above.

BPLC strongly supports the strategic planning role performed by the GLA, and by extension the London Plan as a tool to promote development in London. Battersea Power Station’s regeneration, and the wider regeneration within the Nine Elms Opportunity Area, is the result of successful close collaboration between strategic and local authorities, under the auspices of a Development Plan that promotes the delivery of new homes and jobs. The Draft London Plan, published in December 2017, needs to provide the same positive and supportive environment for development so that London can continue to be a place that people want to visit, reside, work and invest, and so that it can meet the myriad of challenges it faces in fulfilling these various roles. We support the ambition of the Draft London Plan and its vision for our great city, but have concerns that the desired outcomes may not be achieved as intended and set our detailed comments below within this context.

Battersea Power Station as a strategic development site

The Battersea Power Station site has a long history and has been subject to a number of failed attempts at redevelopment. Over a 30 year period, the sheer complexity of the site and cost of delivery has seen off several determined developers; it is arguably the most challenging development project in London.

Because of the significant challenges in bringing this project forward, a flexible planning framework and collaborative approach have been essential in stimulating and facilitating the project. In order to continue delivery over a 15 year period, certainty is critical. BPLC purchased the site in September 2012 out of administration following the collapse of the previous developer and finally commenced delivery of this ambitious project, 30 years after the Power Station was decommissioned. The investment decision made by the international consortia was based on a set of planning obligations and parameters contained in the Outline Planning Permission, and the continuation of development remains dependent on those obligations and parameters. Where such obligations or parameters are changed without an understanding of their wider impact or an ability to compensate for any additional impacts, the delivery of an already challenging project becomes even more challenging and less certain.

As London relies more and more on strategic sites and major multi-phase regeneration schemes such as Battersea Power Station to provide the homes and jobs it needs, the particular factors involved in successfully delivering such projects over a long period of time become ever more important, and the imposition of policies and rules that place greater risk on these schemes has the potential for an ever greater impact on the delivery of the objectives of this Draft Plan.

Use of Section 73

As highlighted above, the Battersea Power Station masterplan will be delivered over a 15 year period. Inevitably on such a large project, changes need to be made and, to date, these have been done via Section 73 amendment applications to the original Outline planning permission.

The decision to purchase the Power Station site was made on the basis of the planning obligations and parameters of the approved Outline planning permission. There is significant concern by the owners of the site that the Mayor will seek to renegotiate the original consent when a future S73 amendment application is submitted. Such a scenario could call into question the merits of the original decision to invest in the project and its future delivery.

RECOMMENDATION: That the Mayor makes it explicitly clear that new policies will not be applied to historic permissions where they are being amended by Section 73 applications and that new policies shall only be applied to the relevant amendments.

Summary
We appreciate and support the ambition and vision of the Draft London Plan, and applaud many of its big ideas for our city. However, at a time when the development industry is uncertain over the impact of Brexit, and in the face of a housing crisis where delivery is key, we question the benefit of increasing the burden on planning applications. The Draft London Plan introduces the requirement for additional new documents to support planning applications, along with a large number of new factors to consider, and numerous further controls that will restrict the ability to adapt and develop designs in order to make them deliverable. We are mindful of the requirement within the Greater London Authority Act for the London plan to only deal with matters of strategic importance to London, and question whether a document of this length and detail can truly accord with this requirement. These additional documents and new considerations add cost for developers and require resources and
expertise within Councils to assess. In combination, the Draft London Plan will make the planning process slower, more expensive and more difficult to navigate, at a time when the exact opposite is required. We would encourage greater flexibility and a clear distinction between planning and other regimes, such as Building Control, so that developers really can deliver the homes and jobs that London needs.

User: Camden Conservatives

LEGAL FRAMEWORK

1. By section 41 of the Greater London Authority Act 1999 (“the 1999 Act”), the London Plan should be consistent with national policy. This is set out in the National Planning Policy Framework (“NPPF”) which is supported by the Planning Practice Guidance (“PPG”). The guidance in the NPPF about plan making generally refers to Local Plans. However, in light of section 41, it is appropriate to apply the soundness tests of paragraph 182 of the NPPF to the Draft London Plan, therefore it should be positively prepared, justified, effective and consistent with national policy. This was the approach taken by the Inspector into the Further Alterations to the London Plan (November 2014): see paragraph 2 of his report. There is no basis for taking a different approach now.

2. Therefore, the statement at paragraph 0.0.20 of the Draft London Plan that: “On some occasions, the Plan deviates from existing national policy and guidance; this is mainly where the Plan is delivering on a specific Mayoral commitment and reflects the particular circumstances of London. The scale of the Mayor’s election victory provides a significant political mandate to use the planning system to deliver his manifesto commitments” is wrong in law, being inconsistent with section 41 of the 1999 Act,

3. Further, the Draft London Plan is intended to set out land use policies over the next 20-25 years. The Mayor’s political mandate extends for only 4 years, and therefore is irrelevant as a basis for departing from national planning policy.

User: Association of Consultant Architects

GENERAL
We support the transport section, which seems sensible. We welcome the design section but are concerned that its aspirations will not be followed through. It is certain that a discretionary system can provide good/inspiring development (as demonstrated at Kings Cross): therefore a greater degree of flexibility is surely desirable. It is not entirely clear how the Plan will deal with changing market forces - there may be too much control and/or excessive detail in, for example, policies E7 and E11. We are also doubtful about the plethora of acronyms - UGF, SINCs, RIGs, AQFAs, etc.

User: Friends of the elderly

1. Overview

1.1. Friends of the Elderly has been supporting and caring for older people since 1905. The charity is working to ensure that all older people have the opportunity to live fulfilled and respected lives, by providing high quality caring services.

1.2. At its Woodcote Grove site in Coulsdon Friends of the Elderly provides residential, specialist nursing and dementia care for up to 59 people. Friends of the Elderly would like to expand the facilities to care for more people and provide better facilities which it currently doesn't have the capacity to do, such as provide a private bathroom for every resident and other facilities to ensure that residents are comfortable and are provided with the best care towards the end of their lives.

1.3. The Government's report on the "Future of an Aging Population" published 7 July 2016 found that "The UK population is ageing…By 2040, nearly one in seven people is projected to be aged over 75." The policy implication being that "The ageing population will change demand for housing. In particular, it is likely that more adaptable and specialised housing will be needed".

1.4. The draft London Plan acknowledges this in the following paragraphs:
1.4.1. Paragraph 4.15.1 of Policy H15 states that London is expected to experience substantial growth in its older population and appropriate accommodation is needed to meet the need of older Londoners.
1.4.2. Paragraph 4.15.4 establishes that the total potential demand in London is over 4,000 specialist older person units each year between 2017 and 2029 (and beyond that the numbers will continue to increase – paragraph 4.15.6). Table 4.4 in Policy H15 sets out the annual benchmark for each borough, citing 100 units per annum for the Borough of Sutton.
1.4.3. Paragraph 4.15.5 provides that Boroughs should plan proactively to meet the identified need for older persons accommodation.

1.5. Friends of the Elderly supports the publication of the new draft London Plan and setting the strategic direction for London. Particularly, Friends of the Elderly support the creation of a London where all Londoners, including older people and disabled people can move around with ease and enjoy the opportunities the city provides, creating a welcoming environment that everyone can use confidently, independently, and with choice and dignity, avoiding separation or segregation (Policy GG1). Furthermore, Friends of the Elderly agrees that to create a housing market that works better for London, those involved in planning and development must create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing (Policy GG4).

1.6. Friends of the Elderly set out below representations in relation to specific policies which are relevant to achieving those Good Growth Policies highlighted above.

User: Pocket Living

Additonal Matters

New Methods of Construction

Additonal wording should be placed through the Draft London Plan to support the use of modular construction on major schemes. Pockets has been at the forefront of the technological change which is taking place throughout the development industry. Using modular construction is faster, more sustainable and less disruptive. It can reduce the movements of large vehicles to construction sites throughout London benefitting Londoners by improving air quality. The London Plan should encourage the use of modular construction by offering benefits to developers to utilise this method of construction.

One possible 'carrot' should be an allowance that the use of modular construction would allow non compliance with certain design standards within the scheme and/or allowance to provide a bespoke approach to housing tenure. By providing incentives to developers to utlilise modular construction will have major benefits acorss London and these benefits balance non-compliance with other policy requirements such as housing mix.

Where modular construction is used, Council's should waive some or all of the employment obligations during construction, which oftern used to provide local construction and training opportunities. Modular construction takes place in factories in other parts of the UK and required specialies construction workers and engineers. Many of the lower skilled and apprentice jobs that could be created are already provided in the factory location and so contractors should not be made to also provide them on site. As the benefits are significant in terms of reducing the use of large vehicles and faster contruction times, it is considered that obligations related to employment during construction are not neccessary.

A further mechanism that could be used would be differential CIL charges both for Mayoral CIL and Borough CIL for the use of modular construction. Pocket would wish to explore this in greater depth with the Mayor and his team.

User:	Maria Panayi
I reject the council's plans and vehemently voice my objections, which I would like recorded.	

User:	Mr Mike Bowler

Please do not ruin the lives, the health and the enjoyment of present and future generations by lack of foresight today.

User:	Frank Harding

Overall, the London Plan is inconsistent with national planning policy and should therefore not be approved. I do not agree that the scale of the Mayor’s election victory enables him to depart from national policy. Just as important as the Mayor’s mandate is the role that local communities have been given to shape their own communities (for example, through Neighbourhood Plans). This must be respected. Not only this, but the London Plan lasts until 2041, and should not be shaped by the events of one election.

User: Federation of Enfield Residents & Allied Associations

FERAA has reviewed this draft London Plan and welcomes it in general terms, noting how it pulls together many strands of life in the Capital which, if efficiently managed can contribute to quality of life aspirations as expressed by our many members. But we do find the draft less convincing on means to make good the ambitions laid out in its many pages; implementation will be the touchstone of how much of a contribution the new Plan can make to life for millions.

FERAA sets out below observations on how implementation can be frustrated or negatived by divergent councils. We seek assurances in the final plan that strategies are made substantive through supportive policies, even directives, to guard against tendencies in those borough councils seeking to evade or minimise concordance with the London Plan. Our experience in Enfield suggests there will be more than a few such potential conflicts.

We propose a mechanism to accelerate and improve governance of Greater London; every borough CEO and Leader should submit themselves to questioning by GLA members in open session, as departments do in Parliament before select committees. The public would be free to view. Each council would be questioned annually on a pre-prepared summary of policy priorities it had selected to realise the aims of the London Plan. This would be a mutually reinforcing part of the London wide planning process, and educate GLA members in the realities of centrally generated policies. Councils not able to cooperate would attract demerits, as in Parliamentary proceedings.

Summary: we believe the London Plan will continue to under-deliver if a basic assumption prevails that borough councils will always take a benign course of action, one best suited to the long term benefit of their residents and employing best practices. Our experience in Enfield over several years denies this assumption. We observe that the differences in quality of management between boroughs could not be greater. The London Plan must therefore institute processes, checks and procedures that require significant decisions in all key identified areas to be brought in for compliance clearance and modification.

User: Federation of Enfield Residents & Allied Associations

1. **Revised Local Plan:** Enfield council announced a new Local plan process well over two years ago but has produced nothing to date. We fear this proceeds from a failure to agree a vision for the borough. The GLA could help by laying a duty on each borough to state its vision and get local buy-in, before a new plan is set forth. A borough plan should be a cohesive entity, not a collection of patchwork quilts. Enfield has resorted to a piece meal planning approach to further evade essential definitions. Without a vision we have no basis of common acceptance on which to proceed. Ad hoc announcements and rhetoric are no substitute for rigorous process.
2. **The London Plan is key to local delivery**: Enfield council is unfortunately not proactive, for reasons stated above, reacts to developers, and under values its notable borough-wide assets. It reacts to external proposals with inevitable patchy outcomes and inconsistencies. Its lack of commercial nous is very obvious so it needs help to find its way even when it cannot admit to its shortcomings - Meridian Water being a prime example. When we look to neighbouring boroughs we see a more positive pattern, eg Barnet, where large developments are in hand and delivering, and note the difference in quality executions between the boroughs. We invite the GLA to recognise and take action to transfer best practice between boroughs to ensure a more even and successful level of performance.
3. **Fair and supportable inward migration should be agreed**: Enfield has apparently been allocated a disproportionate share of London's migration / population growth. The council, instead of seeking assurances over supportive infrastructure for up to a further 75,000 residents by 2031 is using this target unquestioningly on residents, apparently to prepare for revenue-generating housing. So, it insists it has no option but to open land for building. We urge that planned inward migration should be proportionate to capacity to house without degrading the quality of life in the borough through over-crowding, and recognise the stressing effect on migration arising from the high cost of housing in Enfield – back to lack of vision again. FERAA urges Enfield Council to re-scope its vision of itself to deliver firstly to its existing 324,000 residents, and calls on the London Plan to incorporate safeguards to ensure this basic requirement is met for each and every policy.

User: Regeneration X

General Points in Summary

Many people, and community groups, believe (and the evidence seems to support this view) that London is being rapidly transformed to meet the needs of 'elites' in the world with too much focus on London being a ‘global city’ and doing so at the expense of the diversity and community which we (and the Mayor claims to) value so much and at the expense of the real economy. The new London Plan (and the Housing Strategy) needs to confront and re-balance these power relationships if London is to retain all that makes it a success.

We are concerned about the references to the intensification and densification of development in outer London – to do this in an acceptable way implies heroic assumptions about the quality of design and place making which will be delivered in practice as opposed to in theory (or required by policy). In short, we do not believe that the high quality design and place making required to make high density work will actually be delivered. This also applies to inner London and its planned for densification. Therefore we cannot and do not support these policies.

This London Plan seems to be based on two incorrect assumptions:
1. that neoliberal economics has not recently been seriously challenged and that the next 30 years will be based on the economic philosophy and assumptions of the last 40 years;
2. that leaving the EU will not make any difference to the rate at which London grows over the next 30 years: in short there is no recognition that the UK's and London's economy may not follow the pattern of the recent past.

In closing we would say that 'we' (the public, central government, the London Mayor, the GLA, The London Assembly etc) really need to debate and decide who London is for – those who live and work in London (not ignoring London's affect on the rest of the UK and the wider world), or is it for the rest of the world to treat as just an investment opportunity and a safe place to store their wealth?
We cannot support the London Plan as proposed.

User:	Julia Palca

Overall, the London Plan is inconsistent with national planning policy and should therefore not be approved. I do not agree that the scale of the Mayor’s election victory enables him to depart from national policy. Just as important as the Mayor’s mandate is the role that local communities have been given to shape their own communities (for example, through Neighbourhood Plans). This must be respected. Not only this, but the London Plan lasts until 2041, and should not be shaped by the events of one election.

User: Julia Palca

Andrew Parkinson's full submission to the Mayor in response to the draft London Plan
Camden Conservatives consultation response to the Draft London Plan

LEGAL FRAMEWORK

1. By section 41 of the Greater London Authority Act 1999 ("the 1999 Act"), the London Plan should be consistent with national policy. This is set out in the National Planning Policy Framework ("NPPF") which is supported by the Planning Practice Guidance ("PPG"). The guidance in the NPPF about plan making generally refers to Local Plans. However, in light of section 41, it is appropriate to apply the soundness tests of paragraph 182 of the NPPF to the Draft London Plan, therefore it should be positively prepared, justified, effective and consistent with national policy. This was the approach taken by the Inspector into the Further Alterations to the London Plan (November2014): see paragraph 2 of his report. There is no basis for taking a different approach now.

User: London Borough of Hillingdon

Whilst the Council welcomes the opportunity to comment on the draft Plan, it is extremely concerned that the proposed policies encourage unsustainable patterns of housing growth. Fundamentally, the document will fail to address housing needs in Hillingdon and across London as a whole.

The increased reliance on small sites is a particularly inadequate response to London's housing need. This approach will encourage the delivery of small, substandard accommodation that does not meet the specific requirement for family housing and destroys the character of suburban areas in outer London boroughs like Hillingdon. Unlike the current London Plan, the draft document does not adequately address the key planning policy issues in outer London and will not deliver the necessary infrastructure to support planned growth.

The Council is extremely concerned that the draft Plan will not meet the needs of our residents and I have asked the Council's Planning Policy Team to meet with your officers at the earliest opportunity to discuss the points raised in the attached response. I would be grateful if you could please facilitate this discussion.

User: Barbara Brayshay

I write in response the following elements of the London Plan to emphasise the importance of protecting community assets and resources in future plans for London:

Specifically, I refer to the following elements of the London Plan:

Policy GG1 Building strong and inclusive communities

Policy S1 Developing London's social infrastructure

Policy HC5 Supporting London's culture and creative industries and

Policy HC7 Protecting Public Houses

My concerns are expressed in the following statement from the Reclaim Our Spaces manifesto:

#1 Help produce a shift in thinking so that access to and the value of community spaces is not based on business plans and income generation but on the social value of the community space and its contribution to health and wellbeing, inclusion, integration, empowerment and poverty reduction.

#2 Recognising the irreplaceability and uniqueness of many community spaces and looking after them for future generations is part of a continuing legacy.

#3 Valuing and resourcing community-centred knowledge and creativity for the contribution this can make to policy discussions and a whole system approach to community engagement across the GLA.

#4 Community spaces are not just physical buildings, but social spaces where cultural expression takes place. These social spaces provide movement and interaction between different cultures and it is important they are integrated as well as truly accessible to all.

#5 Community spaces are essential to the achievement of lifetime neighbourhoods in which housing, health and education facilities, shops and other local amenities are affordable and accessible to everyone, now and for future generations, and there is support for community networks based on social co-operation and mutual aid.

#6 Housing estates provide a wide range of community spaces – community halls, open spaces, playgrounds and other facilities – which must be protected and their use encouraged.

User: Transport for London

We have worked closely with your Deputy Mayor for Planning, Regeneration and Skills, the wider Mayoral team and colleagues at the GLA to develop the Plan. This has sought to emphasise the important role of efficient, active and sustainable transport in supporting all six of the Plan's overarching objectives. Overall, we welcome the ambition of the Plan, and the policies it contains. Alongside your Transport Strategy, these policies will ensure that growth is delivered with sustainable transport outcomes, helping meet the target of an 80% overall sustainable transport mode share by 2041.

Given the scale of London's forecast growth over the next twenty years, we support the Plan in putting transport and land use integration at its heart. We support the requirements for all new development to make the most effective use of land, encouraging space-efficient, active travel and promoting new development in accessible and well connected areas of London such as around stations and town centres. This approach is central to increasing densities in a sustainable way across the capital. In this respect, we also support the clear linkage that the draft Plan makes between higher levels of connectivity, higher development densities, and lower levels of car parking provision.

Much of London's future growth will be concentrated in Opportunity Areas, many of which will depend on significant transport investment, such as the Bakerloo line extension, Crossrail 2 and other rail upgrades and extensions.

The draft Plan contains policies which are supportive of such interventions, including in relation to the protection or land for transport infrastructure, stressing the need for funding from development and highlighting the importance of the timely delivey of growth in line with transport improvements. Beyond the Opportunity Areas, a significant amount of growth will occur in suburban outer London, where a number of interventions on the transport network will be needed, including buses and walking and cycling infrastructure, to ensure that growth does not depend on the car.

The draft Plan identifies the need for significant investment to deliver the infrastructure necessay to support growth. Beyond the important role played by existing mechanisms such as the Community Infrastructure Levy, we continue to work closely with the GLA and central government in considering the role that greater fiscal devolution to London could play in reducing the transport infrastructure funding gap, in line with the recommendations of the London finance Commission.

The draft Plan also accords priority being given to public transport alongside affordable housing in the negotiation of planning obligations, and this is strongly supported, and must be maintained if we are to be able to support good growth.

The draft London Plan sets an ambitious and exciting spatial strategy for growth, and contains policies which are vital to enable the delivery of your Transport Strategy. We look forward to continuing to work closely with you and your team at City Hall in supporting the London PIan over the course of its development, examination and through to adoption.

User: Joy Brown

Having taken the time to read the entire document twice, it is of concern that the whole plan is based on unlimited growth, and that quantity of people/units takes precedence over quality of life. “Big” is not always “Beautiful” and “Bigger” is not always “Better”. Scientific research exists to prove that overcrowding leads to stress and mental health issues; and although it may be argued that providing more homes will improve matters, there is also the argument that the smaller homes proposed and the associated reduction in private space and gardens will not improve matters in the long term and could lead to a decline in well-being and health and a decrease in productivity.

A great deal of Private Finance will be needed but developers are likely to resist certain proposals which impact adversely on profits, and compromise will have to be made. I have no confidence that the best proposals of the plan (such as a) the proper phasing of infrastructure provision; b) Londoners being given an opportunity to purchase new homes before overseas marketing takes place) will remain, but believe they will be watered down or disappear. Londoners may well end up with the worst of the plan’s proposals and not benefit from the best.

User: Karl Brown

General

Many statements spread across the plan are fully supported. Not unique, and highlighted here merely as an example: “7.5.2 … culture also plays a role in building strong communities, increasing healthy life outcomes and generating civic pride.” There are many such examples, which are worthy of wide promulgation.

User:	Pat Turnbull

Foreword from Sadiq Khan

Amend to remove the terms ‘genuinely affordable’ and ‘affordable’ throughout the London Plan so that the type of housing is described specifically i.e. social rented housing, London Affordable Rent, London Living Rent, shared ownership, market housing for rent, market housing for sale.

User: Mr Tony Kane

I consider that the plans should take into account neighbourhood planning.

Small development sites can be identified by local groups as either suitable or unsuitable. Local groups are the experts in this area (Good Growth Policy GG2)

many communities are already preparing neighbourhood plans. It is vital that they are recognised and given proper attention.

Local groups have done valuable work on infrastructure projects.(Cross Rail 2) This work should not be wasted.

User:	Rhonda May

Please no more homes in havering. Our schools Drs and Hospital can’t cope as it is the traffic is st a standstill. Obviously you need to see the state of havering

User:	Kathy Clauss

Overall, the London Plan is inconsistent with national planning policy and should therefore not be approved. London should not be allowed to depart from national policy and thus potentially override policies of the existing local communities which have been created to shape their own communities.

User:	Karolina Zieli?ska-Dabkowska

Supporting document

User: Matthew Robinson

6. BROWNFIELD DEVLEOPEMENT

The definition of a brownfield site is very broad. It is “Land which is or was occupied by a permanent structure, including the curtilage of thedeveloped land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure.(https://www.designingbuildings.co.uk/wiki/Brownfield_land)

The listing and reclassifying of brownfield sites must be carefully monitored because this definition covers most sites. Misuse of this category is already creeping into the system with the loss of playing fields, allotments, green and open spaces and parks to the ‘brownfield’ category,
.
I look to the London Plan to protect built on land for uses other than housing. To ensure this we ask for further policy measures to be included in the London Plan. It is also important for the London Plan to use a Social Impact Assessment when deciding on change of use as in the case of brownfield sites

User:	Louise Chatterton

Overall, the London Plan is inconsistent with national planning policy and should therefore not be approved. I do not agree that the scale of the Mayor’s election victory enables him to depart from national policy. Just as important as the Mayor’s mandate is the role that local communities have been given to shape their own communities (for example, through Neighbourhood Plans). This must be respected. Not only this, but the London Plan lasts until 2041, and should not be shaped by the events of one election.

User:	Mr Mark Davison

Overall, the London Plan is inconsistent with national planning policy and should therefore not be approved. I do not agree that the scale of the Mayor’s election victory enables him to depart from national policy. Just as important as the Mayor’s mandate is the role that local communities have been given to shape their own communities (for example, through Neighbourhood Plans). This must be respected. Not only this, but the London Plan lasts until 2041, and should not be shaped by the events of one election.

User: Richard Ferraro

Apart from the detailed points made above, the Draft New London Plan is inconsistent with national planning policy and should therefore not be approved. I do not agree that the Mayor and the GLA should consider it their right to depart from national policy. I strongly object to that, both in principle and in detail.

Of great importance in the Planning Process is the role that local communities have been given to shape their own communities (for example, through Neighborhood Plans). These rights must be fully respected. However, in my professional and personal opinion, the Draft New London Plan seriously oversteps the mark; it seeks to erode the rights of individuals and local communities, to defend their communities against inappropriate development.

In my view, the Draft New London Plan seeks to over?ride the reasonable preferences and rights of local communities in London. In addition to my detailed objections (as above), I also strongly object to this proposed erosion of rights.

User: Gail Waldman

3D.2 The draft appears to suggest that the National Infrastructure Commission should favour London over the regions, a view with which we cannot agree.

4 CO PRODUCTION OF PLANS

4A - avoid top down

4A.1 Co - production with communities on plan delivery is essential, not just "consultation" in keeping with a localism first approach.

User: Gail Waldman

6 COST BENEFIT ANALYSIS

6A - fairness and balance

6A.1 We would like to see a Cost Benefit Analysis which takes the whole of the UK into account in the interests of fairness and balance and is reoriented towards community values and social justice.

6B - promote community inclusiveness and values

6B.1 The Plan must reflect the needs of the whole of the UK to go hand-in-hand with the transformation needed to ensure confidence in the planning system, meet the aspirations of citizens, provide a future based on community values and social justice.

7 CONCLUSION

7A - duty to cooperate on both pan UK basis and with local communities, and with North in particular

7A.1 We consider that the draft New London Plan requires a pan-UK duty to co-operate to ensure a fair rebalancing of opportunity for our citizens. The Duty to Cooperate needs to be based on localism first and foremost.

7A.2 We urge these two policies are re-thought.

User: HGH

Professional sports

Policy 4.6 of the current London Plan provides support for the continued success of London's professional sporting enterprises and recognises the cultural, social and economic benefits that they offer to its residents, workers and visitors. However, this recognition of the importance of 'professional sport' has been lost from the New Draft and should be reinstated.

The presence of the many professional sporting clubs, including QPR, within London represents a significant economic, social and cultural asset and one that should be celebrated and supported. The New Draft Plan should recognise this and incorporate a new policy stating the Mayor's continued support for the activities of these clubs at all levels from their core professional activities through to the grass roots work they undertake with local communities.

User:	Association of Directors of Public Health

The ADPH London welcomes this draft London Plan and in it particular its:

- commitment to ‘Health In All Policies’
- emphasis on children and young people
- reference to the social determinants of health, and its ambition to improve Londoner’s health and reduce health inequalities.

User:	London Borough of Hounslow

LB Hounslow is concerned with the lack of a a policy that recognises the importance of addressing the health and environmental risks posed by land contamination as part of developing a growing city. Its absence is also inconsistent with information set out in the evidence base documents (See IIA and Scoping report comments above) for the draft new London Plan. It is recommended at the very least the current London Plan policy for ‘Contaminated Land’ and supporting text is reinstated.

User: Primrose Hill Conservation Area Advisory Committee

2.0 Objectives of our submission

2.1 As local communities we welcome many of the aspirations of the Draft New London Plan, especially in the provision of affordable housing, affordable employment space, green space, clean air, and the protection and enhancement of the heritage which makes London's localities distinctive – which makes our areas home for our communities.

2.2 Much of our submission seeks to address what we see as inconsistencies, or potential conflicts between policies. We know how, if these are not resolved at this stage, they will lead to delay in policy formulation and frustration in development management decisions. This can only lead to the frustration of Plan objectives and implementation.

2.3 It also leads to disenchantment with the planning process, and with democracy itself. This can further frustrate active citizenship, and diminish diverse engagement. We welcome the Mayor's stated intention of working collaboratively with local communities in realizing the objectives of the Plan. We see our submission as part of that collaboration, and look forward to a positive response to our submission and to developing the Plan further together.

User: Lina Pio

1. Summary

Sadiq Khan, the Mayor of London, is consulting on a draft for a new London Plan. This is a crucial document that will guide planning decisions across London for the next 25 years. If approved Camden Council will have to confirm to the policies in the London Plan. A copy of the plan can be found here: https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/download-draft-london-plan-0.

As currently drafted the proposed new plan has the potential to significantly weaken planning policy, with polices that the Mayor openly admits do not comply with national policy. The Mayor is seeking to depart from this because of the scale of his election victory (see page 5).

Local Conservatives have prepared and submitted a detailed critique of the proposals and called for stronger measures to protect local green space and to deal with the traffic and air quality issues, including the school run. Key issues with the draft plan include:

- It imposes a new “presumption in favour” of development for schemes involving less than 25 house that are less than 800 meters form a tube station (page 152-153). This applies even it if it is in the setting of a listed building or in a Conservation Area. This would make it harder to oppose planning applications like 28 Redington Road (recently successful opposed by the local community).
- It is much more in favour of tall buildings (page 126-129), and this means it will be even harder to object to buildings like 100 Avenue Road which are completely out of keeping with our area.
- It weakens protection given to Metropolitan Open Land such as Hampstead Heath (page 305). The Heath has in the past had the same status as the Green belt and this should be maintained.

User: Nina Glass

I am writing to object to the Draft New London Plan.

The plan weakens the planning protection given to Hampstead, and as a resident for many years and with intention to remain many more, I have no choice but to make my position known. With its historic conservation areas, open spaces (including Hampstead Heath) and unique character, Hampstead needs to be protected.

There are three policies to which I am specifically objecting; so doing on the basis that they are inconsistent with national planning policy.

User: Nina Glass

In summary, the London Plan is inconsistent with national planning policy. It is not a Plan which should be approved.

I disagree strongly with a departure from national policy. Although the Mayor won by a strong margin, he hasn't a right, in my view, to depart from national policy. Indeed, just as important as the Mayor's mandate for his coming years - if not more important, as our roles in neighbourhoods long continue beyond Mayoral tenure - is the role which local communities have to shape their own communities (for example, through Neighbourhood Plans). This must be not be disrespected. Moreover, the London Plan lasts until 2041, and it would be heresy to create a Plan based on the events of one election.

User: Shari Donnenfeld

I am writing to object to the Draft New London Plan.

The plan will significantly weaken the planning protection given to Hampstead, with its historic conservation areas, open spaces (including Hampstead Heath) and unique character.

There are three policies in particular that I object to, on the basis that they are inconsistent with national planning policy.

Overall, the London Plan is inconsistent with national planning policy and should therefore not be approved. I do not agree that the scale of the Mayor's election victory enables him to depart from national policy. Just as important as the Mayor's mandate is the role that local communities have been given to shape their own communities (for example, through Neighbourhood Plans). This must be respected. Not only this, but the London Plan lasts until 2041, and should not be shaped by the events of one election.

User: June Armstrong

In Vassall and Coldharbour Forum (VACF), we have guiding principles that have come out of years of collaborative pain and joy. Here, we are using them to respond to the London plan. The parts in bold are our comments on the draft London Plan, and we have left the guiding principles in so you understand the values of the community who are offering these specific comments. It may take a bit more effort for you to take on board our comments, but we want to remedy our invisibility in the planning process and also make transparent the values that are underpinning the comments.

These comments refer to

Policy GG1 Building strong and inclusive communities

Policy S1 Developing London's social infrastructure

Policy HC5 Supporting London's culture and creative industries and

Policy HC7 Protecting Public Houses

VACF Guiding Principle 1. We value COLLECTIVE, OPEN AND ACCESSIBLE WORKING PRACTICES that are open to and build with community.

Comments on the draft London Plan coming out of this principle:

Participation in the draft London plan has not been enabled for each and every community member and group to become involved in its process.

For example, In Policy S1, regarding Developing London's social infrastructure, the phrase 'Development proposals' appears three times and 'seeking, maintaining and supporting community participation' doesn't appear once.

VACF Guiding Principle 2. We VALUE the life-ways, knowledges and experiences of each and every community member, especially those who are less acknowledged on account of their race, gender, class, income, ability or religion. We work towards the full acknowledgement and participation of each ----community member. We actively BUILD TRUST.

Comments on the draft London Plan coming out of this principle:

We are concerned that it does not build the trust, nor an appropriate platform necessary for increased engagement in public processes.

We don't see the life-ways, knowledges and experiences of each and every community member acknowledged in the plan.

VACF Guiding Principle 3. We DRAW ATTENTION TO how important all people and all heritage is in building community culture, because it makes it strong and stable across generations. We act in ways which demonstrate that both people and heritage grow SUSTAINABLE COMMUNITY. We resist the erosion of what we have built, through struggles and through careful negotiation, over time and we invite creative input from all members of the community.

We acknowledge how both people and heritage grow SUSTAINABLE COMMUNITY and are concerned about the erosion of what Londoners have built, through struggles and through careful negotiation, over time and we invite creative input from all members of the community.

Comments on the draft London Plan coming out of this principle:

We would like to see embedded in the London plan, inclusive ways for communities to become stronger and more robust, enabling those with expertise to 'pass the baton' and share this expertise across age/race/income/ability/income/gender divides.

We don't see in the Plan suggestions for how to redress and remedy the ways people have been disunited by building developments across London.

We don't see in the Plan any action to honour the feelings of fear and loss about the changing nature of neighbourhoods?

We don't see in the Plan recommendations to encourage the community to invest time and resources in community run, community focussed organisations?

We don't see in the Plan acknowledgement of how Housing estates provide a wide range of community spaces – community halls, open spaces, playgrounds and other facilities – nor a protection of these spaces and support to use them to greater and fuller capacity.

VACF Guiding Principle 4. We WELCOME AND NURTURE DIVERSITY OF COMMUNICATION AND INPUT by encouraging a range of communication styles to help grow and inspire more shared, abundant and co-creative engagement.

Comments on the draft London Plan coming out of this principle:

We don't see in the plan strategies for implementation to help nurture diversity, and grow and inspire more shared, abundant and co-creative engagement.

VACF Guiding Principle 5. We are rooted in the local but balanced by looking at the 'global'. We think and act in a way that increases the community's awareness of itself as well as its understanding of outside initiatives and the wider social, economic and political context.

Comments on the draft London Plan coming out of this principle:

We don't see in the Plan strategies to help produce a shift in thinking so that access to and the value of community spaces is not based on business plans and income generation, but on the social value of the community space and its contribution to health and wellbeing, inclusion, integration, empowerment and poverty reduction.

Without specific support to access community spaces, how can communities meet, grow and learn together; how can poorer communities host their own learning and initiatives for well-being?

With specific support to access community spaces, how can the recommendations, as they stand in the London Plan, support individuals to grow their awareness, participation and self-created improvement of individual and family opportunities.

With specific support to access community spaces, how can the very people who hold the knowledge and wisdom to support the wellbeing of communities do so, without a valuing and resourcing of community-centred knowledge?

With specific support to access community spaces, how can the whole community work alongside the GLA for a London that works for all, without specific resources to support us?

VACF Guiding Principle 6. We CARE ABOUT FAMILIES, CHILDREN and WORK-LIFE BALANCE. We understand that at the personal, family and community level that spiritual and emotional well-being is important. We also understand the importance of children, elders and people with disabilities being well cared for within the context of safe, sound and shared family and community responsibilities, and we strive to support this happening as we progress.

Comments on the draft London Plan coming out of this principle:

We really question the concept of good growth if inequalities are not being addressed and means it is so hard for some members of our community to meet needs for their own, their family's and community's well-being?

We would love to see a Plan for London that really acknowledges everyone's needs mattering equally, which involves looking at how different Londoner's needs for safety, equality, wellbeing aren't being met.

We would love to see a plan that acknowledges and values spiritual and emotional wellbeing.

VACF Guiding Principle 7. We value the importance of healthy, safe and inspiring environments to live and work in and that each member of the community, from child to elder has a responsibility to contribute to both creating and maintaining such an environment.

Comments on the draft London Plan coming out of this principle:

We don't see any consideration to the impact of intensification/densification on the health and wellbeing of people and of any mechanisms you suggest to avoid this negative impact.

We are concerned that with densification in poorer areas how the environment can become more safe, healthy and inspirational.

We are concerned that the Plan does not support all community members to become and continue to share in the creative and sustaining responsibility of environmental care and management.

User:	Colin Gillespie

I believe that everyone in London has the right to breathe clean air, have access to nature and to benefit from clean energy. I am therefore pleased to see policies in the new London Plan which seek to address these important issues.

User: David Scott

Like you, I think that all Londoners have the right to breathe clean air, should all have ready access to nature and should all have the opportunity to benefit from clean, non-polluting energy. For these reasons, I am happy to find that there are some policies in the new London Plan which seek to address these vital environmental issues. In particular, I am please to see the proposal for a ban on fracking, policies to protect greenbelt land and Metropolitan Open Land and a commitment to a zero-carbon London.

This is a very positive start, but only a start.

I really think that your London Plan needs to go much further in a number of ways, and would like to make the following suggestions...

User: CPRE London

We are encouraged by many aspects of the draft Plan and particularly its focus on making the best use of land, as outlined in Policy GG2. Meeting London's development needs while protecting, extending and improving the quality of its green and public spaces presents a major challenge. We are delighted that the draft recognises the importance of green spaces in London but we believe the policies need to be strengthened considerably in order to give them adequate protection and to help deliver the Mayor's commitment to make more than 50% of London green by 2050.

User: Mr Daniel Willis

Community Links' response to: Greater London Authority, *The London Plan: The Spatial Development Strategy for Greater London* (draft for public consultation, December 2017).

a) Good Growth: good for BAME communities?

The Mayor's recognition that the growth of London's population and economy has had positive and negative impacts on London's communities, and has the potential to further exacerbate existing inequalities across the capital, is welcome. In the London Borough of Newham, where Community Links is based, we have seen a range of impacts (investment in our local area, regeneration of derelict buildings) and challenges (increased housing pressures, displaced families, isolated communities) as a result of growth in the past decade. We are particularly concerned about the impact on Black, Asian and Minority Ethnic (BAME) communities in one of the UK's most diverse local authorities and fear that this is not fully understood or addressed in the new draft London Plan.

We are dismayed to see that the proposed Plan would continue to treat large parts of Newham as an "Arc of Opportunity" from the Royal Docks to the Olympic Park. Whilst rhetorically this suggests that some of London's most deprived communities will see much-needed investment, in practice regeneration has ignored the voice of the local community, displaced low-income families and forced them out of the Borough. Moreover, housing developments built for more affluent, incoming residents have been built to enable connection with Canary Wharf and the City, with their backs to the communities closest to them. Not only does this kind of growth threaten low-income families, but it has the potential to divide our community and make BAME communities feel increasingly like second class citizens. The local residents we speak to every day are asking: who are these Opportunity Areas an opportunity for?

We therefore call upon the Mayor to immediately conduct an assessment of the impact of Opportunity Areas on BAME communities across London, including an analysis of the impact of loss of social housing, community assets and cultural spaces. We support the call by Just Space for: a full review and assessment of Opportunity Areas and other delivery models; the promotion of "lifetime neighbourhoods" which "promote rather than eradicate, the existing qualities and diversity of London's neighbourhoods"; and a shift away from growth-based models of development to a place-based, community-led London Plan. Furthermore, we call on the Mayor to amend "Policy GG1: Building strong and inclusive communities" to ensure that important community resources are not sacrificed on the altar of "Opportunity", and that community assets of social and cultural importance to BAME communities, and others, are registered and protected during processes of regeneration.

b) Health and social infrastructure

We welcome the Mayor's recognition of the importance of health and social infrastructure throughout the proposed Plan and support the aims set out in "Policy GG3: Creating a healthy city". The preamble of Policy GG3 alludes to a more holistic understanding of the socioeconomic determinants of health inequalities in the modern city and Community Links wholeheartedly endorses this approach. In our Strategic Plan for 2018-20, we outline the concept of "Ready for Everything Communities" in which residents are able to support each other to overcome problems, prevent them from occurring again and help each other to thrive and achieve their goals. In the coming years, we aim to build these healthier, happier communities by providing new solutions to the public service landscape focusing on Employability, Health, Housing and Open-Door Advice Services. We look forward to sharing the findings of our work and engaging further with the Mayor and GLA on this in the future.

That being said, we believe that it is vital that the new Plan places greater emphasis on the importance of community centres and preventative services in the ecology of social infrastructure. As the Plan highlights, health inequalities are indicative of deeper social and economic inequalities. We use our community hubs in Canning Town, Stratford and Silvertown to deliver crucial services which all contribute to positive physical and mental health outcomes for our local community. The Early Action approach we deploy aims to intervene in issues before they come crises and is increasingly being deployed by institutions, including the London Metropolitan Police, to tackle public health issues (such as knife crime). Community Links has also achieved excellent results in our breast and bowel cancer detection programmes which now operate in 17 London boroughs.

With this in mind, it is clear that community centres such as ours play a vital role in delivering a healthy city. Health professionals are recognising these centres as vital to social prescribing and so the protection and expansion of these centres should be given strong consideration in future planning decisions. Community Links therefore endorses the proposal by Just Space for health and well-being indicators to be incorporated into decision-making around regeneration schemes and for further analysis of the impact of housing displacement on health to be conducted by the GLA in collaboration with the voluntary sector. Furthermore, we call on the Mayor to amend Policy GG3 to recognise: that spatialised economic inequalities play an active role in determining health inequalities; that advice services and community centres form part of the ecology of a healthy city; and that an Early Action approach can help to deliver a healthier, happier London.

c) Place-based approach to community

At its core, the proposed Plan articulates how spatial strategy can produce a different kind of society, envisioning a London of the future which is (among other things) inclusive, diverse, digitally connected, economically empowered, greener and healthier. Community Links admires this vision and we believe there are significant parallels between the Mayor's view of London and our own place-based work at our community hubs in Canning Town, Silvertown and Stratford. In recent months, we have facilitated community consultations at each hub to co-curate, with local residents and organisations, a programme of activities designed to provide crucial advice, employability and digital skills training and health-based activities. With a particular focus on empowering young people and BAME communities in the local area, this place-based work is the starting point in enabling each area to become a "Ready for Everything Community". We encourage the Mayor to visit our community hubs to see the impact of our holistic approach to community services.

However, we are concerned that elements of the proposed London Plan may eventually undermine, rather than support, our work. Each of our hubs falls within Newham's "Arc of Opportunity" which has, in recent years, seen closed public services, rising house prices and the displacement of BAME and low-income families. Rather than supporting a local, place-based mechanism for delivering the principles of Good Growth and social cohesion, the design and architecture of recent development projects has divided and isolated communities. Opportunity Areas therefore appear to accelerate the unequal distribution of housing densification across the capital and subvert the guiding principles of the draft Plan.

Greater measures should be taken to ensure that a fair, inclusive, community-led Plan delivers on the Mayor's vision and protects the existing ecology of community services. In addition to the policy proposals set out above, we propose that the Plan: requires Boroughs to create community asset registers; ensures the protection of community spaces and services which are of social and cultural importance to BAME communities; and outlines more specific guidance for the "meanwhile use" of public land by community groups and the voluntary sector.

d) Housing

Community Links applauds the Mayor's plans to embark upon an ambitious house-building strategy to tackle the current housing crisis. The new Plan's ambitious targets for house-building in Newham, higher than any other Borough, are a recognition of the drastic need for greater provision of affordable homes in our local area. However, our organisation is also concerned at the possibility that housing will not be developed in accordance with the principles of "Good Growth" and will lead to the displacement of low-income and BAME families from Newham. Social homes should be priced at rates affordable to local people. As we have found from conducting research with local organisations such as the Magpie Project in Newham, there is also a need for a greater quantity and quality of temporary accommodation.

Newham has experienced vast redevelopment and regeneration over the past decade; particularly in the Lower Lea Valley, Royal Docks and Beckton Riverside areas set out in the 2011 London Plan. Research has shown that the regeneration of Stratford has displaced low-income families from the area. Furthermore, local residents believe that new developments were deliberately designed to exclude them and attract affluent, incoming residents to the area. Through our community programmes, advice services and research projects, we are now hearing similar concerns from residents about regeneration schemes in Canning Town and Silvertown.

Housing inequality is both a "symptom and a driver" of wider inequalities in London's economy, including health inequalities. Whilst we welcome the Mayor's ambitious strategy, it is crucial that the new Plan's housing offer aims to deliver a more equal society with more affordable housing, without displacing London's diverse communities. Community Links supports calls from My Fair London and the Local Government Association to set "affordable rents" at 30% of household income (rather than 80% of market rent). We endorse the proposals by Just Space that the Plan should explicitly make clear "with reference to housing costs and incomes, [how] the housing needs of households with less than median income levels will be addressed". Furthermore, we call for: longer-term tenancies to provide stability in the Private Rented Sector (PRS); the mandatory licensing of landlords; and a review of housing standard enforcement in the PRS in order to increase the quality of housing.

e) Retail gentrification and the Night-Time Economy

We commend the Mayor’s efforts to foster a more equal, polycentric, diversified economy which delivers opportunities for all of London’s communities. Community Links welcomes the Mayor’s reference to digital connectivity as a crucial component of London’s future. In fact, we are developing a Digital Hub which will provide digital skills and employability training to the local community. We are pleased to see that the proposed Plan aims to prevent loss of “essential convenience and specialist shopping” units and that local identity will be a factor in planning decisions regarding economic activity. In principle, this suggests that the new Plan will support the entrepreneurship of Newham’s diverse communities and protect the numerous cafés, supermarkets and retail outlets which support BAME communities (including East London’s growing Eastern European and Latinx populations).

However, on this point there again appears to be a contradiction between the Mayor’s attempt to create a more welcoming, inclusive and equal London and the intention to embark on widespread intensification projects. As Hubbard has argued, in regeneration and gentrification processes it is often corner cafés, “convenience 'ethnic' grocery stores” and pubs which are among the first to be replaced. As well as contradicting the Mayor’s emphasis on developing a more diverse and entrepreneurial economy, this process would have a detrimental effect on community cohesion as these independent retail units play a crucial role in supporting ethnically diverse and less affluent communities. The Equality Act 2010 states that public bodies should consider inequalities caused by socio-economic disadvantage when making strategic decisions, but we fear that the new Plan risks exacerbating existing inequalities by favouring retail gentrification. In order to avoid this, we believe that the London Plan must include steps that enable the genuine participation of communities, business owners and employees in re-shaping their local retail environment.

Community Links therefore supports calls from Just Space for: the Mayor to implement the Equality Act’s socio-economic duty in all decision-making processes related to economic activity; and for the Plan to include a commitment to ensure the representation of diverse industrial sectors, including businesses owned by ethnic minorities and migrants, on GLA decision-making boards. We also call upon the Mayor to include a specific clause in the new London Plan which recognises the role played by diverse, independent retail units in London’s economy and their importance for creating a welcoming, inclusive and vibrant atmosphere for everyone. Furthermore, we call on the Mayor to ensure the protection of these units in future planning decisions by drawing up a register of SMEs, businesses and commercial spaces across London that play a crucial role in the economic, social and cultural life of the local community.

f) Heritage without a community?

Community Links welcomes the Mayor's emphasis on the importance of heritage, culture and local identity in the new Plan. Our own headquarters at 105 Barking Road has a rich history as a site where key figures from the East End's labour movement, including Sylvia Pankhurst, Daisy Parsons and Will Thorne, made speeches in the late nineteenth and early twentieth century. The building has had previous lives as a theatre and town hall, but for almost 30 years has been home to Community Links' youth, employability and advice services. We are now working hard to further repurpose our home to be a digitally inclusive community hub for the 21st century and believe that the Mayor would be very interested to see the work we have also done in preserving, and enhancing, the building's rich heritage.

Nonetheless, we would like to reiterate our concerns to the Mayor about the prospect of our local community being displaced or disrupted by the housing and retail intensification projects envisioned in his new Plan. For over a century, 105 Barking Road has been a focal point for the local community in which low-income families have socialised, sought help and organised to amplify their collective voice. Since Community Links has been in residence, the building has also become a lighthouse for marginalised BAME communities seeking advice and support in troubled times. Over the past few years, the need for these services has increased greatly.

What would it mean for the history of our building, and for Newham's heritage, if local communities are displaced from their homes and support networks in the borough? What is the purpose of preserving the architectural heritage of 105 Barking Road, as a superficial façade of community, if the families who form the deep roots of our community are forced to leave the area? And how can the Mayor's strategy preserve the most diverse element of London's vast cultural heritage, its people, whilst redeveloping the space in which they live?

71% of Newham's population is from Black, Asian and minority ethnic backgrounds. Centre on Dynamics of Ethnicity (2013) Geographies of Diversity in Newham. University of Manchester.

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Paul Watt (2013). "It's not for us": regeneration, the 2012 Olympics and the gentrification of East London. *City* 17 (1), pp. 99-118.

My Fair London (2017). Housing and Inequality in London: Building a Better London for all Londoners. My Fair London: p.3.

Ibid. p.4; Patrick Collinson (2017). One in seven UK private tenants pays more than half income in rent – study. *The Guardian*, 3 Jul 2017.

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Suzanne M. Hall (2011). High Street adaptations: ethnicity, independent retail practices, and localism in London's urban margins. *Environment and Planning A*, 43:11, pp.2571-2588.

Just Space (2018). Towards an industrial strategy for London (draft). Just Space: pp.3-4.

User: Mrs Desmonde Child

1) At 500 pages long and very poorly organized, the Plan appears to aim to put people off commenting. Was it no one's job to read all the contributions and amalgamate them into a comprehendible document?

2) Planning Lawyers and Consultants must be thinking all their Christmases have come at once. Which of the many versions of duplicate policies is the one to be followed?

2) Top down planning dicta like this does not work. It would have been far better to ask Boroughs how many new homes they could realistically add during the next decade, with the proviso that when identifying land suitable for housing, Councils must at the same time safeguard sites and funds that will be needed for the social and engineering infrastructure to meet the needs of new inhabitants. There will be no Utopia for London if new homes have inadequate supporting infrastructure.

3) There are no realistic policies to prevent new homes being bought off plan and left unoccupied as golden bricks. The Plan's aim is stated to be to extend Inner London development densities to Outer London, but if measures were in place (as they are in other countries like Germany) to stop golden brick investment, then London's housing shortage would not be so acute.

4) There are many excellent aspirations within the Plan, but then there are policies which mean they are not achievable. E.g. Over development results in new sources of pollution (waste and well as air).

User:	East of England Aggregates Working Party

Overall EEAWP welcomes the positive approach in the new draft London Plan in acknowledging the ongoing need for aggregates in the development of the city and the need to safeguard facilities associated with this.

User:	Mr Tony Gibson

Living in Enfield, we have already 'lost' due to weak local government we do not want to lose any more.

Overview

User:	London Forum of Amenity and Civic Societies

London Forum concludes from assessing the need for income explained in this chapter that the New London Plan is not achievable in its targets for additional homes of the type that are needed.

The development of London's economy will be adversely affected also as businesses may relocate.

Modal shift from the use of cars will be later with serious implications for air pollution, bus journey delays and road congestion. The latter will adversely affect deliveries.

The figures for delivery of the full infrastructure required, including public transport show that unless the Government funds a lot of it and increase devolution of tax and related revenues and powers, the Treasury will see reduced income from a lower GDP of London.

User: Association of Licensed Multiple Retailers

Enabling Infrastructure

UKHospitality recognises the need for innovative ways to help fund London's creative infrastructure. London is one of the world's premiere destinations for tourists, and for good reason; its world class hospitality industry is envied the world over and continues to flourish despite punishing commercial conditions.

For this reason, UKHospitality is firmly against the introduction of any mechanism that could potentially pave the way for more charges on hospitality businesses and tourists. This is specifically in reference to point 11.1.61, which refers to a desire to be granted '…permissive powers to develop new mechanisms, subject to consultation'.

A 2017 report undertaken for the London Finance Commission by GLA Economics recommended the introduction of a 'tourist tax' or 'tourism levy' for London, and the Mayor of London has publically voiced his support for such a tax. UKHospitality thus has reservations that the 'mechanism' referred to in 11.1.61 would allow the introduction of a bespoke charge on tourists in London.

Proponents of a tourist tax often point to European countries and cities that levy tourist taxes on their visitors, claiming that this appears to do little damage to their tourism industries or visitor economies. What is neglected in making this argument is that the majority of countries that apply a tourist tax have far lower rates of VAT on hotel tourism services than the 20% rate that applies in the UK, which is almost double the European average. Even in the United States where there is often a combination of local, state, sales or special taxes added to the cost of a hotel room, there is no combination of taxes that equates to the UK's 20% rate of VAT. Any form of additional charge would be verging on punitive in nature and would drive away visitors over a longer period of time. It is simply too simplistic to say that such charges will not make a difference.

A tax on visitors staying overnight in London would also fail to achieve what its proponents often say it would: namely that it would be a mechanism to ensure that visitors contribute to the area that they enjoy by helping to pay for clean streets, infrastructure projects, and transport improvements. As this would simply be a tax on visitors staying overnight, day visitors would not be affected. According to Visit Britain, there were 337 million day visits to London in 2016. A charge on tourists would not apply to these people, but they would still enjoy the same benefits as overnight visitors. It is also conceivable that tourists would simply stay outside London and travel in to avoid paying a tourist tax, meaning that hotels would lose valuable revenue and local authorities would miss out on lucrative tax receipts.

Finally, the plan's comments in point 11.1.62 about the desire to 'to promote devolution across the country' is also profoundly worrying to UKHospitality and its members. With local authority budgets under sustained pressure across the UK, it is entirely conceivable that councillors could introduce various forms of taxes on tourists to help make up the monetary shortfall. This type of short term fix is not a viable answer to more profound budgetary problems, and would indeed exacerbate the problem in the long run.

We cannot get to a situation where local authorities can unilaterally bring in further charges on tourists. UKHospitality has successfully made this argument to both the Welsh and Scottish devolved governments – who have no plans to devolve the necessary powers to bring in such charges – and are currently in dialogue with the UK government to ensure that tourists in England are protected from the same charges. We appreciate that new ways of raising money must be considered, but taxes on tourists are not the answer and would have a negative effect in the long term

User:	Natural England

We concur with the acknowledgement in paragraph 11.0.3 that there is a significant need to invest in green infrastructure. We would also like to highlight that where necessary to facilitate the flow of ecosystem service benefits from existing and new green infrastructure, funding for the long-term management of green infrastructure should be sought, and this should be emphasized within this chapter of the plan.

Policy D1 London's form and characteristics

User: Association of Consultancy & Engineering

ACE welcomes the proposals established in this policy, and strongly agrees with the sentiment that quality design and good planning are intrinsically linked. Heading into the future it will be crucial that design policies in the plan should aim to optimise density, connectivity and land use.

Additionally, the Mayor must consider how London’s current typology and existing buildings will fit into future designs. Currently, London is comprised of a range of different building typologies reflecting its long and diverse history. To avoid diminishing London’s character, ACE suggests a presumption in favour of retrofitting buildings, before considering new development on these sites. Many areas in London that contribute to its character do not contain listed buildings, but the Mayor should aim for these to be retrofitted and expanded first and demolished to make way for new development only as the last resort. This recommendation aligns itself to the broader aim of moving London towards a more circular economy that seeks to minimise waste and keep assets and materials at their highest value for as long as possible.

The Mayor should also afford London boroughs the ability to designate their own design standards relating to the ‘look and feel’ of their local area. This will allow London boroughs to preserve and enhance their local character, whilst also granting greater autonomy over the future look and feel of the borough.

User: Galliard Homes

Galliard have concerns with the drafting of PolicyD1–London’s form and characteristics and

how it conflicts with subsequent design policies. For example, part B(1) requires design to respond to the `local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality’. The use of the word `shape’ is an overly prescriptive design requirement and removes any ingenuity, creativity or artistry. This wording opposes the aspirations set out in Policies D6 and D8, and offers justification for a planning authority or committee to refuse an application, even if in a town centre or highly accessible location, where higher density development is promoted. This policy needs to be reworded.

User:	Simon Saville

I broadly welcome policies D1 to D6 that seek to improve the design and land use efficiency of new housing.

User:	City of London Corporation
Paragraph B (4), there could be reference to improving public access to heritage assets.	

User:	City of London Corporation

The City Corporation welcomes the importance placed on a comfortable pedestrian environment (sunlight, shade, wind, air pollution, noise and shelter) in para 3.1.2. These factors should be key in informing new development design, in the main part of the policy.

The City of London welcomes maximizing urban greening but more emphasis should be placed on the need to integrate urban greening in the key early stages of design development of schemes as opposed to retrofitting later on.

User: PCS Trade Union

This section should clearly state the need to “include 35 per cent onsite reduction in GHG emissions”. Whilst we disagree this number is sufficient (see later section on sustainable infrastructure) we think it is important to be explicit in setting out the need for “good design” in its contribution to meeting climate change targets. Expressions such as “aim for high sustainability standards” (D1;B3) are too ambiguous.

There also needs to be more explicit reference to ensure infrastructure, therefore design, meets future energy needs and changing transport modes. This includes electric charging points for vehicles and integration into urban environments, alongside other transport measures. See also comments on Transport Section below.

User:	Freight Transport Association

Policy D1 London’s form and characteristics page 98
FTA supports the proposal that new developments should be designed and managed so that deliveries can be received outside of peak hours including in the evening and at night without disturbing residents. In addition, it is welcome to see that appropriate facilities will be required to minimise additional freight trips arising from missed deliveries.
Large new developments or change of use should trigger an area-wide review of the on-street signs and lines and every high street should have a periodic review at least every five years to ensure that the facilities are still fit for purpose.

User:	London Borough of Barnet

It is largely recognised that the same health benefits are not achieved through low quality greenspaces as high-quality spaces-regardless of accessibility23. Public health supports the protection of high quality and high value green spaces but would like the Mayor to recognise how funding concerns may impact quality (and consequently health) in the longer term. Being strategic about the types of open spaces that are protected may be a more valuable and efficient approach and may also help meet additional demands set out in the London Plan. Additionally, the Mayor could explore alternative methods for funding the upkeep of open spaces so that all protected open spaces can be high quality.

User:	Wheels for Wellbeing
3.1 We support the idea that Development Plans should encourage and facilitate inclusive cycling routes and cycle parking. Connectivity is particularly important for disabled cyclists who, in order to complete a full journey, require step-free, door-to-door routes that are reliably and consistently accessible (which includes fully accessible, integrated modes of transport).	

User: Thames Water

We believe that to enable properly integrated, cost-effective, water efficiency and sustainable drainage / flood risk management, these objectives need to be considered at the earliest possible development stage.

We would like to see Policy D1 Part A.9 explicitly state the need to consider water management (including water reuse, flood risk management and sustainable drainage).

In Policy D1 Part B, we believe that development design ‘should’ deliver, rather than ‘aim’ to deliver high sustainability standards.

User: Heathrow Airport Consultative Committee (HACC)

Carbon Emissions

9. The HACC notes that the DofT estimates of the level of carbon emissions are lower than those given in the Airports Commission Report. This is driven by higher load factors on larger aircraft and a new generation of engines being introduced through the evolution of existing aircraft types. The DofT's view is that all the possible schemes would meet the UK's obligations under the Climate Change Act.

Air Quality

6. The HACC has expressed concerns that there is a 'high risk' of a three runway Heathrow failing to be compliant with air quality targets between the time the new runway is expected to open in 2025 and 2029 – thereafter the risk falls to 'medium'. Heathrow actions to mitigate this are limited as aircraft will continue to use fossil fuels for the foreseeable future. Improvements to air quality must therefore come from changing surface transport to hybrid/electric vehicles for those accessing the airport and those using the M4/M25 motorways. Furthermore, there must be

greater use of public transport by airport users/employees. Government incentives will be needed to accelerate this change.

Noise

7. The HACC recognizes that all the schemes have the potential for significant negative noise impacts. It is estimated that around 93,000 more people will be affected by noise with a third runway in place compared to a two runway Heathrow – by 2030 some 650,000 will be affected. There should be some alleviation through the introduction of quieter aircraft and the HACC believes this move should be incentivised by Heathrow. It is likely that more annoyance could be caused by the increased number of aircraft using the airport, particularly to people who are newly under a flight path and the Government needs to assess this when coming to a final decision.

User: Doosan Babcock

Chapter 3: Design

Policy D1 London's form and characteristics

Comment on 3.1.3:

We are supportive of approaches which design out exposure to poor air quality and noise from internal and external sources. Technology solutions exist to support this, for example fuel cells are virtually zero pollution (NOx / SOx / PM / VOCs / CO) and low noise. There is also a need to make sure local authorities and developers have access to relevant information about available technologies and how they can meet the requirements of the London Plan.

User:	London Assembly Planning Committee

Recommendations Policy D1 should be cross referenced to H2 B2 (area-wide design codes) Policy D1 should be cross referenced to GG1 that is itself amended to emphasise the importance of design for accommodating increased density

4.8 The Planning Committee fully supports the need identified in Policy D1 B1 for development to respond to local context ‘that respond successfully to the identity and character of the locality’ – however, it is unclear about what this means in policy terms. For example, paragraph 3.1.2 sets out that it ‘should complement the existing streetscape and surrounding area’.

4.9 However, it is not clear how this relates to Policy H2 B1 that requires boroughs to recognise that ‘local character evolves over time and will need to change in appropriate locations to accommodate additional housing provision and increases in residential density’. This confusingly suggests that development should complement the existing streetscape but also that it should change the local character.

User:	London Waste and Recycling Board (LWARB)

1. We support policy D1(A(10)) – London’s Form and Characteristic, which states development plans, area-based strategies, and development proposals should facilitate efficient servicing and maintenance of buildings and the public realm as well as deliveries. We would suggest this policy also includes waste collections.

User: London Waste and Recycling Board (LWARB)

1. We support policy D1(B(2)), which states that development designs should give thorough consideration to practicality of use, flexibility, safety and building lifespan through appropriate construction methods. Designing for flexibility reduces time, effort and materials traditionally associated with building use transitions and expands the range of possible users of a building. We would suggest this point is extended to include consideration of the building and materials used after the initial use to allow for reuse.

User:	London Waste and Recycling Board (LWARB)

1. We also support policy D1(B(3)), which states development design should aim for high sustainability standards. We suggest this includes a reference to the circular economy design principles set out in figure 3.1.

User:	London Waste and Recycling Board (LWARB)

1. We welcome the inclusion within paragraph 3.1.8 that shared and easily accessible storage space to support separation of recyclables should be considered at an early design stage. We would further suggest this must be linked to the inclusion of appropriate levels of in - home storage for recycling.

User:	London Waste and Recycling Board (LWARB)

1. We welcome, and fully support the inclusion of circular economy design principles in paragraphs 3.1.10 – 3.1.12 . We suggest there may be a need for more detailed explanation of what is meant by design for adaptability and disassembly in paragraph 3.1.10. This could be included in the further planning guidance for sustainable design and construction mentioned in paragraph 9.2.10.

User:	London Waste and Recycling Board (LWARB)

1. We support the recognition in paragraph 3.1.11 that large scale developments will be able to facilitate London’s transition to a circular economy, and welcome the inclusion of reference to further guidance on the application of these principles in London’s Circular economy Route Map. We suggest that additionally large scale developments are encouraged to consider using the London growth/infrastructure map currently being developed by the GLA to assess other major developments planned or in progress to identify opportunities developments to share or reuse resources from other sites.

User: Newham Union of Tenants

Policy D1 – London's form and characteristics

We propose:

1. Policy D1(B)1 contradicts policy set out elsewhere – including policy relating to Opportunity Areas. This section should also apply to Opportunity Areas ad large scale developments.
2. Policy D1(B)2 is, in part, about clear measurable standards and in part on subjective evaluations. We feel the policy should stick with clear measurable standards.
3. Issues such as designing out exposure to poor air quality, noise and crime, having good space standards and storage space, use of good quality construction materials, delivery of 150-year lifetime of buildings (at least), should be included in policy D1.
4. A matrix should be developed that facilitates assessment of adequate levels of green, play, youth and community infrastructure, affordable leisure facilities, local shops, services and amenities for any development - large of small. This should be based on delivering lifetime and walkable neighbourhoods.

User:	Wandsworth Society

We welcome the aspirations set out in this policy. However, we would prefer ‘existing and emerging’ in part B 2) to be considered further. Some existing areas have suffered from excessively inappropriate development which must not be used to justify further inappropriate development.

User: London Borough of Merton

Support subject to amendments: Policy D1 is supported and particularly complementary to Policy D4 concerning internal storage for recycling. However it would be helpful if the policy included reference to communal open space, which appears absent from the LP. (Policy D4 also omits reference to this). It also needs a clear definition of what a street is and what are its essential components, otherwise some of the movement requirements can sit uncomfortably with some of the urban design requirements.

The digital economy and a whole range of visitors and servicing requirements will mean there will always be a legitimate vehicular role for streets. These need to be direct and efficient to keep costs and pollution down. There is also the unknown of how car clubs, car sharing and electric vehicles will evolve and what the parking requirements will be in terms of quantity and location. Again, there will always need to be good and convenient access by vehicles and flexibility in the ability of streets movement function to change over time. This issue needs to be more effectively addressed by the LP.

Clarification on the guidance on design reviews supporting para 3.2.7 is needed.

The policy’s promotion of good design to help create healthy places and prevent or mitigate the impacts of noise and air pollution is supported.

User: London Tenants Federation

3.1.1 Policy D1 – London's form and characteristics

We propose:

(i) Policy D1(B)1 contradicts policy set out elsewhere – including policy relating to Opportunity Areas. This section should also apply to Opportunity Areas ad large scale developments.

(ii) Policy D1(B)2 is, in part, about clear measurable standards and in part on subjective evaluations. We feel the policy should stick with clear measurable standards.

(iii) Issues such as designing out exposure to poor air quality, noise and crime, having good space standards and storage space, use of good quality construction materials, delivery of 150-year lifetime of buildings (at least), should be included in policy D1.

(iv) The Mayor should develop a matrix should be developed that facilitates assessment of adequate levels of green, play, youth and community infrastructure, affordable leisure facilities, local shops, services and amenities for any development - large of small. This should be based on delivering lifetime and walkable neighbourhoods.

User: Create Streets

Maximum density.

Policy D1 London's Form and characteristics

Policy D8 Tall Buildings (p.126)

Policy D6C Optimising Housing density

The London Plan is certainly one of 'up' not 'out.' The Green Belt is protected by policy G2. There is no longer a London density matrix. The tall buildings policy is largely pushed down to boroughs. The assumptions within the SHLAA are very explicitly pushing up the density assumptions for capacity measurements. (For example in tables 2.10 and 2.11 of the SHLAA).

Our concern is that with no effective upper limit on densities, the current plan risks a vicious circle of spiralling land prices, superdensity, high service charges, neighbourhood resistance and an inability to deliver physically acceptable or mixed tenure developments. Even if the full density matrix is not replaced, we would suggest a much more unambiguous density upper limits by urban type within Policy D6. As present we think the consequence will be higher land prices and downward pressure both on good design and on developments which can successfully support families and mixed tenure communities.

This will set land prices and make it easier both to deliver affordable housing and better places. This outcome should surely epitomise 'Good Growth' – whilst the alternative would be difficult to call anything but Bad Growth.

User: Create Streets

Better Brownfield: How to banish boxland and turn it into popular, mixed-use London-like neighbourhoods and streets without losing jobs or shops

Relevant Policies:

Chapter 1 Planning London's Future (Good Growth Policies) pp.9-26
D1 London's form and characteristics (p.98)
D8 Tall buildings (p.126)
H1 Increasing Housing Supply (p.144)
E5 Strategic Industrial Locations (SIL) (p.239)
E6 Locally Significant Industrial Sites (p.245)
E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function (p.246)

Greater clarity on mixed-use ‘London-like neighbourhoods’ on brownfield sites. Obviously much of the focus of the London Plan is on building on brownfield sites. The London Plan should more clearly aim to develop brownfield and industrial sites into complex ‘London-like’ mixed neighbourhoods. These should be more clearly described and defined so that they can be measured. The tension between the need for ongoing industrial use and the need for more housing should be explicitly referenced in the London Plan with preference for ‘London-like neighbourhoods’ with maintenance of ongoing use and the importance of streets and urban form reflected more clearly in policies GG2, D1, E7 and H1. The policy on Healthy Streets (T2) should also reflect the need for a good urban form, beauty and lack of high rise wind tunnels materially to encourage walkability.

As London grows there will be competing pressures for land. The draft Plan highlights concerns over the loss of commercial space in the capital and its effects on economic prosperity. Policies E5 and E6 offer protection to Strategic Industrial Land and Locally Significant Industrial Sites. The Mayor is right that productive land uses should not be swept aside to make way for sterile dormitory developments. However, there is a danger that borough officers interpret these concerns too narrowly, settling for the safety of the status quo rather than risk creative change. Land use on boxland industrial sites is rarely optimal and we must not waste the potential to combine uses with better design. Boroughs should therefore critically look at all industrial sites, even those that are operational, to determine if a ‘mixed use’ approach is possible. Landowners of industrial and ‘big box’ retail sites must be even more strongly encouraged to come forward with Mayoral support. Policy E7 is useful in this context but should be more ambitious. It also needs far more reference to issues of good growth and urban form.

User:	London Borough of Haringey
This policy is generally supported.	

User:	London Borough of Haringey

The Council supports this policy. However, there is concern that this policy requires development to respond to the surrounding context, yet Policy H2 Small Sites is encouraging developments that may be substantially out of character with the existing area. This would be especially evident in outer London boroughs.

User:	London Cycling Campaign

Replace:

encourage and facilitate by

provide for increased active travel

User:	London Borough of Hounslow

LB Hounslow supports the policy approach to design in the London Plan to create sustainable and liveable places.

However, the wording of policy D1 (b) conflicts with Policy H2(b) which requires that Boroughs recognise the evolving and changing character of areas. This contradiction may compromise the ability to deliver development on small sites; this is further contradicted by the justifying text to Policy D6 where 3.6.1 identifies that growth in London will need to be accommodate through developing at densities that are above those of the surrounding area on most sites. The Borough's emerging Local Plan Reviews explicitly recognise the importance of the creation of sustainable and liveable places and these form part of their approaches to accommodating growth and development that is people oriented and contextually appropriate.

User: Grosvenor Britain & Ireland

Design

We back the Plan's ambition to create high-density, mixed-use places that make the best use of land. And we welcome the design-led approach proposed to consider schemes for their placemaking value. As long-term creators and managers working at the neighbourhood scale, we look forward to working with the Mayor and other civic leaders to develop a firmer understanding of the components of good placemaking.

In Policy D1 the Plan calls on development to respond to local context through scale, appearance and character. We would like to see an examination of their relationship to policy promoting intensification and densification to ensure that they do not provide local authorities with an opportunity to resist proposals solely on the grounds of local context. It is possible to achieve a densification which responds to the spirit of a local context but this context should not be narrowly prescriptive.

We welcome the focus on healthy living and the way in which biophilic design principles can support the wellbeing of workers, residents and visitors. We support the consideration of new schemes against circular economy design principles. We believe applying those principles to new and existing homes, including throughout the construction period, will be key to the success of the London Environment Strategy and its ambition that London become a zero waste city.

On Fire Safety, we would encourage the inclusion into the scope minor works, specifically conversions and refurbishments which bear a significant proportion of the overall risk - in particular by compromising existing fire integrity. We believe greater clarity is needed on the definition of a Major Development and the benchmark for 'highest fire safety standards'.

User:	Environment Agency

We welcome Policy D1 requirements for development plans and proposals to; provide conveniently located green and open spaces; facilitate active travel; prevent and mitigate poor air quality; minimise negative impacts on the environment; aim for high sustainability standards; and, maximise urban greening.

User:	Environment Agency
We support subsequent references to; designing out exposure to poor air quality (paragraph 3.1.3)	

User:	Environment Agency
We support subsequent references to; designing out exposure to poor air quality (paragraph 3.1.3); maximising urban greening **(paragraph 3.1.4);**	

User:	Environment Agency
We support subsequent references to; designing out exposure to poor air quality (paragraph 3.1.3); maximising urban greening (paragraph 3.1.4); storage space for the collection of wastes and recyclables **(paragraph 3.1.8)**;	

User:	Environment Agency
We support subsequent references to; designing out exposure to poor air quality (paragraph 3.1.3); maximising urban greening (paragraph 3.1.4); storage space for the collection of wastes and recyclables (paragraph 3.1.8); and minimising the use of new materials / reference to ‘London’s circular economy route map’ **(paragraph 3.1.11).**	

User:	Environment Agency
We fully support the emphasis on ‘Maximising urban greening’	

User:	Environment Agency

Recommendation:

D1, point 3), define in text what is meant by ‘aim for high sustainability standards’ by cross-referencing subsequent policies’ objectives, and those targets set out in other Mayoral strategies. Alternatively indicate where it is proposed that later Supplementary Planning Guidance will clarify the Mayor’s expectations. This will avoid ambiguity and planning delays.

User:	Environment Agency

Recommendation:

Whilst the general point is welcome, the requirement to address the management of surface water, should be amended to apply to all forms of flooding.

User: Environment Agency

We welcome the emphasis on delivering good design. We suggest that this policy section might address the government's 25 year Environment Plan (page 34 of that plan refers), to set out the Mayor's expectations that boroughs could work in partnership to explore and pilot ways in which design can contribute to environmental improvements, leading to better places in which to live and work, and reduce environmental footprint

Recommendation:

Para. 3.1.4. Expand this text to draw out that connectivity between urban greenspaces will deliver multiple benefits, thus enhancing the value of London's natural capital.

User:	Soho Society

D1A7 In intensely built up areas like Soho green space can only be meaningfully provided on the roofs of buildings. There have been a few innovative schemes to use roofs as places where occupiers from the floors below can access them for rest and recreation and a break from work. If areas are to be intensified, then greater use of roofs for such purposes will be needed to relieve pressure on the public realm and existing public open space particularly at lunch time. This will need to be suitably conditioned in ways which prevent noise and other nuisance to other occupiers, but the policy should be reworded to enable more such schemes.

User:	London Borough of Lewisham

D1 introduces new concepts such as optimising density, encouraging comfortable and inviting environments and positive reciprocal relationships between inside and outside to generate liveliness and interest, facilitating efficient servicing/maintenance of buildings and the public realm, and minimising the impact of deliveries. We already aim to achieve these principles.

Questions have been raised around policy D1 which could lead to the need for London Boroughs to prepare design SPDs.

User: London Borough of Brent

This policy is supported in principle, but this character based approach in criterion B 1) is somewhat at odds with the London Plan's assumptions on small site capacity and the statement in policy H2 Small Sites criterion b) that boroughs should: "recognise in their Development Plans and planning decisions that local character evolves over time and will need to change in appropriate locations to accommodate additional housing provision and increases in residential density through small housing developments." The emphasis on Figure 3.1 circular economy of hierarchy for building approaches which favours 'retain' or 'retro-fit' is also somewhat at odds with these policy criteria. The density assumptions for suburban areas in the SHMA including the small sites work primarily ignore these elements of policy. Either existing high quality character which is appreciated by the community is important to a place and should be enhanced/maintained, or if it isn't policy D1 should not be the principal element on which the building blocks of new development should be founded. There should be some clarity in either the policy justification for this or the H2 policy.

Part A 3) could be strengthened by specifically mentioning perimeter blocks as the development type which results in the desired street-based development that also addresses the other requirements.

Part B 1) could clarify the importance of roof form by mentioning it specifically.

Additionally, in relation to housing sites and residential-led developments the 12 principles of 'Building for Life 12' (government endorsed) should be expected to be followed, even if accreditation is not a requirement.

Paragraph 3.1.5 Design out crime – should reference the website interactive.securedbydesign.com

Amend text to:

A 3) "be street-based in the form of perimeter blocks wherever possible, with clearly defined public and private environments"

B 1) "respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds

successfully to the identity and character of the locality, including to existing and emerging street hierarchy, roofscapes, building types, forms and proportions"

Add new criterion B 7) "positively address all headline questions of the latest edition of Building for Life 12"

User: Save Swiss Cottage

Policy D1 – London’s form and characteristics
We propose:
(i) Policy D1(B)1 contradicts policy set out elsewhere – including policy relating to Opportunity Areas. This section should also apply to Opportunity Areas ad large scale developments.
(ii) Policy D1(B)2 is, in part, about clear measurable standards and in part on subjective evaluations. We feel the policy should stick with clear measurable standards.
(iii) Issues such as designing out exposure to poor air quality, noise and crime, having good space standards and storage space, use of good quality construction materials, delivery of 150-year lifetime of buildings (at least), should be included in policy D1.
(iv) A matrix should be developed that facilitates assessment of adequate levels of green, play, youth and community infrastructure, affordable leisure facilities, local shops, services and amenities for any development - large of small. This should be based on delivering lifetime and walkable neighbourhoods.

User:	London Borough of Bromley

The policy is generally supported but see also comments on Policy D6 below.

User: London Councils

Boroughs are supportive of the principles set out in this policy. The promotion of active frontages in town centre locations can be particularly supported, as can a requirement for development to be streetbased with clearly defined public and private environments.

However, this policy is potential contradictory as it states development should optimise density but also respond to the local context by delivering buildings and spaces that ‘respond successfully to the identity and character of the locality.’ Given the wording of policy H2 which states that local character will need to ‘evolve over time and change in appropriate locations to accommodate additional housing provision’ further explanation of the weight that should be given to local character in planning decisions will need to be detailed in the full Plan.

User: London Borough of Tower Hamlets

We are broadly supportive of the approach in D1 but also note the emphasis on promoting growth without the specific objective criteria for assessing proposals that are contained in the current London Plan.

It is likely that more development capacity will be discharged as a result of the policy and therefore stronger hooks to particular measureable characteristics may improve the council's position in negotiating better design through the planning process. Currently there is a worrying presence of subjective characteristics whereas we need to have objective measures of quality components.

Policy part B3 references 'sustainability standards', this should be defined to include air, climate and biodiversity objectives, and work alongside B 5) on urban greening.

The policy makes a strong reference to using "land efficiently by optimising density" without recognising that different areas of London have different characteristics. Further comments are made in response to policy D6.

User:	Old Bermondsey Village Neighbourhood Forum

Policy D1 London’s form and characteristics
Add additional wording shown in **bold**
Development Plans **(including neighbourhood plans)**, area-based strategies, and development proposals should address the following:

User:	Old Bermondsey Village Neighbourhood Forum

D1 A 3) “street based” should make reference to existing forms / patterns / grains that contribute to a sense of place (history) or functioning of place (economic or social networks).
D1 A 10) should make specific reference to the positive / necessary role of “yards” / “yardspace” (in relation to the previous point)
D1 B 1) - new frameworks for local consultation should be considered to inform an understanding of the “local context” in the terms described.
D1 B 6) - should be developed to make reference to “public” space

User: London Borough of Waltham Forest

The breadth and detail of the criteria set out in this key policy is supported, although further detail would be useful, particularly on how some of the criteria can be achieved.

The detail could be provided via good and bad examples. For example:

? Part A (4) of the policy - further guidance should be provided on what is meant

by “deliver appropriate outlook, privacy and amenity”

? Part A (6) - further guidance should be provided on what is meant by provide

“positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest”

Within the policies’ supporting text, paragraphs 3.1.10 – 3.1.12 should be made clearer. It is currently confusing and needs further practical explanation on how it is expected to be delivered. It is also unclear how some of these matters can be negotiated and/or secured through planning legislation, or whether these are best placed under current Building Regulations.

User:	Royal Borough of Kingston
Support.	

User: HFFTRA

Policy D1 – London’s form and characteristics

We propose:

(i) Policy D1(B)1 contradicts policy set out elsewhere – including policy relating to Opportunity Areas. This section should also apply to Opportunity Areas ad large scale developments.

(ii) Policy D1(B)2 is, in part, about clear measurable standards and in part on subjective evaluations. We feel the policy should stick with clear measurable standards.

(iii) Issues such as designing out exposure to poor air quality, noise and crime, having good space standards and storage space, use of good quality construction materials, delivery of 150-year lifetime of buildings (at least), should be included in policy D1.

(iv) A matrix should be developed that facilitates assessment of adequate levels of green, play, youth and community infrastructure, affordable leisure facilities, local shops, services and amenities for any development - large of small. This should be based on delivering lifetime and walkable neighbourhoods.

User: London Borough of Hillingdon

The policy outlines a series of largely agreeable design concepts, which are already considered to be established as best design principles in placemaking. The policy is not of strategic value, nor is it prescriptive enough to be implemented in planning decisions or plan making. On this basis, it is considered that Policy D1 should be removed.

Notwithstanding the above, there is a contradiction between the requirement to optimise density in Criterion A 1), with Criterion B 1) of the policy, namely to respond to the local context of the 'existing and emerging street hierarchy, building types, forms and proportions'. It will be very difficult to mitigate for the scale of the difference being proposed through new developments, with that of low-rise suburban development or the setting of heritage buildings. Furthermore, the requirementsattached to these high rise developments, namely on-site amenity, community
infrastructure and car parking will pressurise the site coverage and the boundaries of the existing local environment.

An example should be provided in part 6 of Criterion A, to demonstrate what is meant by a positive reciprocal relationship between what happens inside the buildings and outside in the public realm.

In the event that the policy is retained, the Council’s specific comments on the proposed wording are as follows:

• Criterion B, part 4 should be amended to:
'...respect and enhance heritage assets and their wider settings and utilise other architectural features that contribute to local character'

• Paragraph 3.1.2 should be amended to:
'Their height, massing, footprint and site layout should help make public spaces coherent and reflect the existing townscape characteristics of the surrounding area.'

• Paragraph 3.1.3 should include a reference to the quantitative air quality requirements.

• Paragraph 3.1.4 should include a reference to site coverage and larger sites being able to contribute further to urban greening in terms of accessible green space.

• Paragraph 3.1.9 should be removed.

• Paragraph 3.1.10-11 should include reference to the use of sustainable transport to development sites, e.g. using canals where they abut development sites.

User:	Hammersmith and Fulham Disability Forum

17. Policy D1 London's Form and Characteristics: We are disappointed that there is no cross reference to Policy D3 Inclusive Design.

18. We are concerned about the implications of para 3.1.5 on designing out crime. We have received representations from disabled people that the current concerns on designing out crime and promotion of hostile vehicle mitigation measures are at the expense of disabled people being able to use buildings and the environment. We need assurance that the New London Plan does not promote solutions to design out crime at the expense of disabled Londoners by linking para 3.3.3. below with para 3.1.5.

User:	London Borough of Hackney
This is a welcome move towards a design approach based on an analysis of context and local character	

User: Harlow Council

Planning London’s Future (Good Growth Policies)

Harlow is generally supportive of the six good growth policies set out in the London Plan. However, the authority considers that some of the policies contradict the aims and objectives of other policies in the Plan. There is concern that the propensity to deliver higher density residential uses is likely to compromise the quality of life of existing residents. Whilst it is acknowledged that this is partly driven by current land constraints and restrictions on Green Belt and strategic industrial land, it is considered that specific text relating to the quality of place making could be referenced in Chapter One and again in Chapter 3, “Design”, especially Policies D1 and D2.

User:	Westminster City Council

Given the strong heritage legacy in Westminster, the emphasis on high quality design that responds to local distinctiveness and context, with strong sustainability credentials, is supported.

User:	Ms R Farooq

Excessive housing densities in new development should be resisted to protect the local character of London’s neighbourhoods.

User: InLinkUK

London has some of the most beautiful buildings and most vibrant public spaces in the world which advances in technology should seek to enhance. The city should continue to seek to be a high-density (but not necessarily high-rise) and walkable city that respects its heritage while welcoming new and innovative interventions.

This can be seen with West End theatres using digital displays on the front of their buildings to promote shows in buildings that have been entertaining Londoners longer than any of them have been alive. The reverse can also be seen with many streets cluttered with payphones, connection boxes, and redundant equipment that no longer serves a purpose or would be installed differently if done today - in many areas InLinkUK are looking to remove BT payphones from streets with narrow pavements and only apply for InLink sites where they will not interrupt pedestrian flows.

In implementing good growth under the London Plan, Development Plans, area-based strategies, and development proposals should also be expected to consider the impact their

actions will have on the existing and potential digital connectivity of an area.

It should be seen as wholly unacceptable for a proposal to cause mobile signal or internet access to be below what was previously available. In fact, opportunities should be taken wherever possible to deliver ultrafast and robust internet access for all Londoners (such as the ultrafast Wi-Fi provided for free to all users through each InLink).

Recommendation #9

? That Policy D1 be updated to ensure the form and layout of a place should not inhibit improvements in digital connectivity.

Recommendation #10

? The Policy D1 be updated to ensure that development design should not inhibit community benefits from improvements in digital connectivity.

User: Alison Hatt

Good Design: in view of London's history and heritage, I think it is essential that new buildings as far as possible harmonises with adjacent buildings. Not all existing buildings are pleasant to look at by any means, but preventing the further construction of such eye-sores as the blocks around Battersea Power Station (now almost obliterated by ugly new build) or the triangular object near Victoria Station, to give two examples, would be a public good. Building materials such as glass are harsh and unsympathetic, particularly since so much of London is brick built.

User: Alison Hatt

Good Design: in view of London's history and heritage, I think it is essential that new buildings as far as possible harmonises with adjacent buildings. Not all existing buildings are pleasant to look at by any means, but preventing the further construction of such eye-sores as the blocks around Battersea Power Station (now almost obliterated by ugly new build) or the triangular object near Victoria Station, to give two examples, would be a public good. Building materials such as glass are harsh and unsympathetic, particularly since so much of London is brick built.

User: London Borough of Southwark

Sunlight, shade, wind, and shelter are important aspects of the design of the pedestrian environment that are mentioned in the supporting text. The council urges the Mayor to elevate these aspects of good design into policy itself.

Policy D1 A 10) could be improved to ensure servicing traffic avoids impacts to pedestrians and cyclists in general as well as to vulnerable road users. The council considers that the policy could be strengthened by providing quality of design requirements for denser schemes.

The council is concerned that the policy requires all referable schemes above a prescribed density or defined as a ‘tall building’ to go to a design review panel early on in their preparation, before a planning application is made. An element of discretion may be prudent for schemes which are at the lower range of the prescribed density levels or where the tall buildings are appropriate to the context.

User:	London Borough of Enfield

Policy D1 looks at London's form and characteristics. There is a marked focus on the circular economy in the supporting text but this is not reflected in the policy. Whilst there should be reference to the circular economy in the policy, further detail should be provided in Policy SI7 "Reducing waste and supporting the circular economy" rather than in the supporting text for D1.

User:	London Borough of Wandsworth

Policy D1 is generally supported but could benefit from adding the word ‘conserve’ in D1 B4. The text following the policy is lacking a vision for London as a World City.

User:	The Northbank BID

Chapter 3 Design
D1: London's Form and characteristics – area based strategies (p98)

Suitable encouragement and enforcement is needed for sustainability, air quality, noise and efficient deliveries that minimise the negative impacts. (A 9, 10)

Area considerations for heritage and street character could be combined with sustainability and health considerations. This allow for ongoing improvement and also step change for operations as part of public realm enhancement schemes improve streets for occupiers and property owners.

User:	London Borough of Harrow

This policy is supported in principle, but this character based approach in criterion (B)(1) potentially conflicts with the London Plan's assumptions on small site capacity and the statement in policy H2 Small Sites criterion b) that boroughs should: "recognise in their Development Plans and planning decisions that local character evolves over time and will need to change in appropriate locations to accommodate additional housing provision and increases in residential density through small housing developments." The emphasis on Figure 3.1 circular economy of hierarchy for building approaches which favours 'retain' or 'retro-fit' is also somewhat at odds with these policy criteria. The density assumptions for suburban areas in the SHMA including the small sites work primarily ignore these elements of policy. Either existing high quality character which is appreciated by the community is important to a place and should be enhanced / maintained, or if it isn't policy D1 should not be the principal element on which the building blocks of new development should be founded. There should be some clarity in either the policy justification for this or the H2 policy.

User:	London Borough of Harrow

The Council supports this policy. However, there is concern that this policy requires development to respond to the surrounding context, yet Policy H2 Small Sites is encouraging developments that may be substantially discordant with the existing vernacular. This would be especially evident in outer London boroughs.

User:	London Borough of Richmond Upon Thames

Policy D1 is generally supported. The greater emphasis on the need for development proposals and designs to respect, enhance and utilise heritage assets and architectural features of merit (see D1 B4) is particularly welcomed in the context of Richmond's historic and highquality
environment. However, it is considered that this would be further
strengthened from adding the word 'conserve'.
The additional text (paragraph 3.1.1 to 3.1.12) is considered to helpfully explicate different aspect of the policy, however it lacks reference to a vision for London as a World City. While its inclusion is welcomed, the reference to London's circular economy route map would also be more appropriate in 'Policy D2 Delivering good growth by design'.

User:	London Borough of Harrow

The Council supports the policy to ensure sites within the Borough make the most efficient use of the site. However, being a design led plan, there is concern over introducing a policy that provides such a subjective matter as the mechanism to determine an appropriate density for a site. This policy must be linked with Policy Dl and D2, in terms of design review panels (DRP5). Clarity must be provided in terms of the remit/process/management of such DRPs.

User: London Borough of Havering

Please refer to Annexe 1 submitted with the Havering response letter where there is extensive commentary on the importance of new development(s) properly reflecting the form and characteristics of existing neighbourhoods and local context. Havering strongly supports the requirement that new development should respond to local context, identity and character of the locality but is concerned that this may be fundamentally incompatible with the intention in the draft Plan to intensify and increase density. Havering is very concerned that the pressure to meet increased housing needs will result in a profusion of poor design which will erode the character and appearance of the borough.

The draft London Plan should refer to the provision of lifetime homes, offering opportunities for future adaptation to facilitate independent living for longer, particularly within an ageing population.

User:	Greenspace Information for Greater London CIC (GiGL)

GiGL response: Policy D1’s requirements for local context and character are relevant to the natural environment too and could be included here.

User: Mr Joe Ward

The draft Plan gives insufficient consideration to the protection and enhancement of London's diverse local character. Policies D1 and HC1 need to be amended to ensure that greater attention is given to the character map of London, and community or neighbourhood plans, in planning and designing new development.

Proposed changes:

The first sentence of Policy D1 'London's form and characteristics' should be amended to make specific reference to neighbourhood and community plans so that it reads **'Development Plans, area-based strategies, neighbourhood and community plans. and development proposals should address the following:'** The phrase **'reflect and enhance local character and distinctiveness'** should be added to the list after 1) in Policy D1A.

The first sentence of Policy HC1 'Heritage conservation and growth' should be revised so that it reads: '**Boroughs should, in consultation with Historic England, other relevant statutory organisations and local community and neighbourhood planning groups, develop evidence that demonstrates a clear understanding of London's historic environment, local character and distinctiveness.**'

Rationale: The diverse and distinctive local character of London's neighbourhoods are a major component of its attractiveness and vitality. Recent and future development to accommodate the need for new housing and economic activities risks damaging the distinctive character of London resulting in homogenous 'anywhere' places unless greater attention is paid to the underlying character of its diverse neighbourhoods. Neighbourhood plans and other community planning initiatives are a potentially important means of identifying local character and distinctiveness and should be actively promoted in the London Plan

User: London First

Policy D1 – London's form and characteristics
Policy D1 conflicts with the Mayor's agenda to ensure the best use of land. The requirement to 'respond to local context' and 'respond successfully' is likely to constrain development density. Part B (1) states that:

Design should respond to 'local context' by delivering buildings and spaces that are positioned and of a scale, appearance and shape that respond successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions

Whilst new development should have regard to the local context, the policy as currently drafted will lead to development being constrained by surrounding building typology, scale, and height. If higher densities are to be realised across the capital, development should be allowed to challenge the existing context and set a new one in terms of scale, height, density, and design, provided that it is of a high-quality design.

It should be amended to read:
B Development design should:
1) **have regard** to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions. **Development can also set its own context, provided that it is of a high-quality design.**

User:	TUC London, South East and East of England

Policy D1: London’s form and characteristics

1. Point A9 should reference the air quality around London’s schools as a priority.

User:	Neighbourhood Planners

Add additional wording shown in **bold**

Development Plans **(including neighbourhood plans)**, area-based strategies, and development proposals should address the following:

User:	John Innes Society

D1. We broadly support these policies but object to D1 B 4 unless it reads “respects the established character of the area and enhances and utilizes this character, heritage assets and architectural features that together make up the local character”.

User:	John Innes Society
3.1.10 We strongly support this policy.	

User: London Borough of Bexley

The emphasis on design in the draft London Plan is welcomed and is, again a key feature of our own growth plans. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better.

Policy D1 London's form and characteristics serves as the basis for most of the others within the design chapter. There is, however, little reference to either London's form or its character, with the focus on the minutiae of design principles. In **Part A** there is no reference to the form and layout of a place responding to the existing character and context; therefore this should be amended to include a new criterion that states '*respond to, reinforce and enhance local identity and context*.'

The language in **Part B(1)** is welcomed as it encourages development design to have regard to local context, but it must be the central point of **Policy D1** and reiterate that design should have regard to the best elements of local character and identity. The shift in the text to the word *identity* before the word *character* is welcomed as identity evokes both what places look like as well as how people use places.

Character is about more than the existing architecture. A nuanced understanding of character is one that considers the existing built environment, but also the area's history, its topography, natural landscape and natural features, mixture of uses, type and level of street activity, and other factors that combine to create a unique identity. This understanding should then inform planning policy and development decisions, to secure high-quality schemes that reinforce the best elements of that identity without being constrained by it.

Well-crafted character and context policies do not simply state that new development must match the existing character, but encourage development which is inspired by the best elements of that character, recognising that character is fluid. **Policy D1** fails to properly emphasise the importance of building upon local identity and context and how it should inspire development, along the lines of the approach set out in the existing SPG.

Part A(2) is less comprehensive than the current London Plan text, which refers to the facilitation of '*community diversity, inclusion and cohesion*.' Cohesion is particularly important in areas experiencing significant development, where development and management should be utilised to encourage the integration of new residents into a coherent community. For this reason, it is proposed that **Part A(2)** be amended to read '*facilitate an inclusive and cohesive community*.'

User: Just Space

D1 London's form and characteristics

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

Just Space response:

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

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

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

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

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

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

D1 B 3: "aim for high sustainability standards ?

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

And in text the Mayor should commit himself to lobbying government for harmonisation of VAT rates between new building and refurbishment as recommended by the 1999 (Rogers) Urban Task Force and many other experts and environmentalists. The current disparity is the enemy of sustainability.

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

User:	London Borough of Ealing

This policy is supported and forms part of a welcome shift to including general development management policies in the new Plan. These policies were present in part in the previous plan and are now much more comprehensive. There should be no need to replicate generic policies across all London Planning Authorities and this policy will form part of a practical framework for development management.

As a general note it may make sense to expand on some parts of the policy in supporting wording. For example, to signpost housing design guidance on ‘appropriate outlook, privacy and amenity’.

User:	Federation of Small Businesses

10) The case for having appropriate servicing, maintenance and deliveries to buildings and the public realm cannot be understated to deliver the objectives of a vibrant and inclusive community.

User:	London Healthier Places

The LHP Network supports this policy which promotes:

- Safe and secure environments, by designing out crime

- Conveniently located green and open spaces for social interaction, play and physical activity, including urban greening

- Design and measures to encourage active travel

- Measures to mitigate and design out noise and air pollution

User: Organiclea

4. GREEN SPACE DEFINITION

D1.A.7

The phrase ‘green and open spaces needs to be more closely defined so as not to be misinterpreted. As it stands it is ambiguous and open to interpretation. We know of examples where an area of ‘open space’ consists of concreted paving stones with a tree in the middle of it.

We suggest this policy should read:

Create, provide **and maintain** green and open spaces **as defined below for varied and multifunctional uses such as informal recreation,** social interaction, play, relaxation, physical activity**, food growing as well as areas reserved for cultural or environmental retention that may provide some limited recreation opportunities**

Suggested definition of ‘green spaces’ to include small areas of open space that are accessible to local residents, generally providing for recreation including passive recreation, children’s play and relaxation, which also can provide an identity and a sense of place for a community especially where it incorporates an important landscape feature or historic characteristic (Design Principle – Parks and Open Space: https://www.healthyplaces.org.au/userfiles/file/Parks%20and%20Open%20Space%20June09.pdf, http://www.greenspacescotland.org.uk/definition.aspx). They also include derelict, vacant and contaminated land which has the potential to be transformed

(http://www.greenspacescotland.org.uk/definition.aspx)

Suggested definition of ‘open spaces’ is any open piece of land that is undeveloped (has no buildings or other built structures) and is accessible to the public. Open space can include green space (land that is partly or completely covered with grass, trees, shrubs, or other vegetation). Green space includes parks, community gardens, and cemeteries. Open space also includes schoolgrounds, playgrounds, public seating areas, public plazas, vacant lots, allotments and growing sites. (EPA https://www3.epa.gov/region1/eco/uep/openspace.html)

We believe that food growing spaces are vital green spaces and should be brought into the definition. They contribute positively through productive food growing, bringing community together, providing employment, lessening pollution both locally and in terms of air miles, contributing to local economy, giving people skills and training for employment, lessening isolation, supporting mental health problems and the costs that go with them, reducing waste and using it productively, and making the community more self sufficient and less dependant on services.

We believe that this is essential to the London Plan's over-arching good growth principles (as amended by CFGN and Just Space): GG1 (Building strong and inclusive communities), GG2 (Making the best use of land), GG3 (Creating a healthy city), GG5 (Growing a good economy), GG6 (Increasing efficiency and resilience).

5. CIRCULAR ECONOMIES

D1

Although the transitioning of London to a Circular Economy is heavily weighted in the narrative (3.1.11) there is no specific policy that relates to it.

We suggest an addition policy in D1 which says:

C. All developments must be built following the principles of a Circular Economy; by assessing design, making, selling, re-using and recycling what we use including air, water, waste including human waste, household and the food chain to determine how to get the maximum value from them, both in use and at the end of their life as shown in Figure 3.1.

A Circular economy will be only partial without a deep and penetrating connection to the food chain which can be and needs to be incorporated

We suggest the following points be incorporated into the narrative of D1:

To promote a circular economy London Plan must:

- **Help provide services to food producers in and around cities, including technical training and financial assistance (credit, technology, food safety, market access, etc.) to build a multigenerational and economically viable food system with inputs such as compost from food waste, grey water from post-consumer use, and energy from waste etc. while ensuring that these do not compete with human consumption. (MUFPP, 2015)**
- **Provide policy and programme support for municipal public markets including farmers markets, informal markets, retail and wholesale markets, restaurants, and other food distributors, recognizing different approaches by cities working with private and public components of market systems. (MUFPP, 2015)**
- **Improve and expand support for infrastructure related to market systems that link urban buyers to urban, peri-urban and rural sellers while also building social cohesion and trust, supporting cultural exchange and ensuring sustainable livelihood, especially for women and young entrepreneurs. (MUFPP, 2015)**
- **Acknowledge the informal sector's contribution to urban food systems (in terms of food supply, job creation, promotion of local diets and environment management) and provide appropriate support and training in areas such as food safety, sustainable diets, waste prevention and management.(MUFPP, 2015)**

We believe that this is essential to the London Plan's over-arching good growth principles (as amended by CFGN and Just Space): GG1 (Building strong and inclusive communities), GG2 (Making the best use of land), GG3 (Creating a healthy city), GG5 (Growing a good economy), GG6 (Increasing efficiency and resilience).

User:	Redington Frognal Neighbourhood Forum

D1 London’s form and characteristics. This should be amended to note the role of neighbourhood plans and other community plans and the need to reflect and enhance local character and distinctiveness.

The first (unnumbered paragraph in policy text box D1 (page 98) should be reworded as follows:

“Development Plans (including neighbourhood plans), area-based strategies, community plans and development proposals should address the following:”

D1 A (p. 98-99). A new point 2) should be added and point 4) to be strengthened on heritage preservation.

D1 A 2) “reflect and enhance local character and distinctiveness and preserve and enhance heritage assets.”

D1 B 4) “respect, preserve and enhance and utilise the heritage assets and architectural features that make up the local character.”

User: London NHS Clinical Commissioning Group

Policy D1 London's form and characteristics

This policy covers a range of issues and areas relating to form and characteristics but unfortunately doesn't refer to supporting health and well-being. We suggest that an additional clause could be added as A 11) to support mental and physical health and well-being and an additional clause as B 7) added to incorporate construction and design methods and details which support health and well-being including energy efficiency, noise insulation, suicide prevention, and accessibility. Additional supporting text should be included highlighting how the form and character of places and buildings can have a significant impact on mental and physical health and well-being. High quality design, effective sound insulation, safe and inclusive design all contribute to good health. However, design should also seek to minimise social isolation, with effective use of public areas, and good lighting and measures to help prevent suicides and accidents.

User:	Association of Local Government Archaeological Officers (ALGAO)
Support part B4 for design to respect heritage assets – this should include archaeological assets	

User:	Kingston and Surbiton Constituency Labour Party

Policy D1 states that design should ‘respond to local context’, and that scale, appearance and shape should respond to the identity and character of the locality. How is that consistent with the plans to double housing targets in RBK?

User: CPRE London

Local character

The draft Plan gives insufficient consideration to the protection and enhancement of London's diverse local character. Policies D1 and HC1 need to be amended to ensure that greater attention is given to the character map of London, and community or neighbourhood plans, in planning and designing new development.

Proposed changes:

The first sentence of Policy D1 'London's form and characteristics' should be amended to make specific reference to neighbourhood and community plans so that it reads **'Development Plans, area-based strategies, neighbourhood and community plans. and development proposals should address the following:'** The phrase **'reflect and enhance local character and distinctiveness'** should be added to the list after 1) in Policy D1A.

The first sentence of Policy HC1 'Heritage conservation and growth' should be revised so that it reads: '**Boroughs should, in consultation with Historic England, other relevant statutory organisations and local community and neighbourhood planning groups, develop evidence that demonstrates a clear understanding of London's historic environment, local character and distinctiveness.**'

Rationale: The diverse and distinctive local character of London's neighbourhoods are a major component of its attractiveness and vitality. Recent and future development to accommodate the need for new housing and economic activities risks damaging the distinctive character of London resulting in homogenous 'anywhere' places unless greater attention is paid to the underlying character of its diverse neighbourhoods. Neighbourhood plans and other community planning initiatives are a potentially important means of identifying local character and distinctiveness and should be actively promoted in the London Plan

Protecting and extending green space

User:	Notting Hill Housing Trust

NHHT supports Policy D1 and considers that these are good aspirational standards that should be considered when designing new buildings in London. The acknowledgement of optimising density is welcome; however there may be a need to provide further guidance where this could be seen to be at odds with the requirement to relate to local context, scale and character. In circumstances where a new development challenges the scale of the existing context, NHHT would suggest that this policy should be applied flexibly against the ability of the proposal to meet residential design requirements and achieve high quality design.

User: British Property Federation

Although we acknowledge and welcome policies that seek to ensure quality and sensitive design in light of expected high levels of growth, the draft policy may be at odds with some of the wider aspirations of the draft plan. Policy D1, B 1) states that development design should *‘respond to local context delivering buildings and spaces that are… of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions’.’* Whilst we acknowledge the importance of delivering growth in a manner that respects and improves on London’s existing character, there are successful examples of developments within London that have successfully challenged the existing identity and character of the areas in which they are located, and in turn optimised density. Some of London’s most iconic landmark buildings were, at the time of their planning and delivery, highly innovative in their vision and concept, rather than simply relating to their existing context. This has been the case both in scale and design. We would therefore encourage a greater level of clarity within the plan with reference to the relationship between optimising densities on London’s finite land supply and the scope for innovative design solutions, while taking into account considerations around the existing form and proportions of such localities. We are concerned that the current set of design policies may restrict the delivery of the quantitative targets that the Mayor has identified.

User: Freight Traffic Control 2050 academic project

Point 10 mentions the importance of efficient servicing and deliveries. However, in the text paragraph 3.1.7 only refers to new developments and only discusses activity outside peak hours and means by which to reduce ‘missed deliveries’ without specifying any appropriate actions.

See also responses provided in section T7 which refer to several other issues relating to land-use and freight transport (goods and service) operations in London that are of interest and importance but which don’t seem to be dealt with by the Mayor’s Transport Strategy or the London Plan. These focus on the freight trip generation rates and pattern of these trips at sites (commercial and residential) that receive goods and services. Policy that focused on reducing and improving the operational efficiency of these freight activities could have a major bearing on the intensity and sustainability of freight transport in London. Possibilities and ideas to overcome some of this are provided in responses in section T7.

User: Mill Hill Preservation Society

From the MHPS point of view we are additionally concerned by the following:

- There is a section on design of developments from Policy D1 including criteria for tall buildings in D8. This may allow tall buildings in an area of predominantly low rise. Cities (e.g. Glasgow) which went down the ‘high rise’ route in the past are now having these buildings taken down.
- The target for new homes is increased in the borough by 33% to 31,340 units in the period 2019/20 - 2028/29 this being 3,134 per annum. This will put more pressure on Green Belt, Metropolitan Open Land and other open spaces.
- The requirement for affordable homes has been set at a high percentage of new build. We are concerned about the definition of ‘affordable’ as this seems to be variable and most affordable rents are not actually affordable for the groups that need the housing.
- Densification of land use is proposed in outer London boroughs and town centres. The best use of land does not always mean higher densities. There is no longer a density matrix and several policies indicate how density should be managed. This will be problematic as developers tend to push the boundaries of desirable densities without strong guidelines.
- Excessive housing density in new development should be resisted to protect the character of London’s neighbourhoods. Whilst there is some emphasis on existing local character, serious concern exists that in outer London boroughs character may be sacrificed to meet growth.
- Boroughs' Local Plans will have to be revised to implement the objectives of the Mayor's new plan for London and whilst groups such as ours will need to be engaged in that process, we have no certainty that this will be the case.

The Society wishes to comment on general development and the fact that housing targets have not been met. The proposed targets seem very challenging due to the low rate of new housing delivery in the past three years and the problems around viability assessments. It seems that enough planning permissions are being granted and that developers are not building out their approvals in a reasonable time span, probably to artificially hold the price of residences to ensure future profits. We do not see this issue being tackled in the Mayor’s Plan and we think it needs to be.

User: Uttlesford District Council

Furthermore, the SHLAA explains that estimates of development potential are based upon use of the density matrix in the adopted London Plan, with estimates based on the top of the density range for town centres and higher assumptions applied in opportunity areas reflecting recent trends. This represents a disconnect with the draft London Plan, which no longer includes a density matrix and instead, at Policy GG2 (Making the Best Use of Land), requires a design-led approach to be taken when exploring the potential of land, understanding the character of different places. This is further expanded upon in Policy D1 (London's Form and Characteristics), Policy D2 (Delivering Good Design), and Policy D6 (Optimising Housing Density). In particular, these require a design-led approach that 'optimises' development potential. To optimise development density is a fundamentally different concept to maximising development density, reflecting what is right and appropriate for an area. It is considered inconsistent that the draft London Plan relies on evidence that is based upon an approach that is not reflective of its own policies. Rather, the estimates of potential in the SHLAA should be based upon a design-led approach as required by Policies D2 and D6. This is emphasised by evidence to the draft London Plan[1] which suggests that use of the density matrix 'may result in inappropriate development in certain places'[2].

[1] GLA Density Paper 4, Exploring Character and Development Density

[2] ibid. Section 2.5

User: Mr Terry Wilden

Comment

There should also be a reference to assessing development proposals against established guidance such as the BRE Daylight & Sunlight Report.

Suggested Amendment

Policy D1 (A)

“The form and layout of a place should:

4. deliver appropriate outlook, privacy, ***daylight & sunlight, and other amenity benefits.”***

Reason

An assessment of the impact of new development on daylight & sunlight to neighbouring properties is essential to ensuring that substantial and significant harm to local residents is avoided or mitigated.

User: Mr Terry Wilden

Comment

We generally support this policy**, but there should also be a reference to “residential density” and “patterns of development” in Section B1.**

Suggested Amendment

Policy D1 (B)

“Development design should:

1. respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging, street hierarchy, ***patterns of development***, ***residential density,*** building types, forms and proportions.”

Reason

Existing and emerging patterns of development and density are a critical part of protecting and establishing local character and distinctiveness.

To ensure consistency with proposed policy D2.

User: Claire Mellish

7 Heritage and Culture (HC policies) 267 / 285

The draft Plan gives insufficient consideration to the protection and enhancement of London's diverse local character. Policies D1 and and HC1 need to be amended to ensure that greater attention is given to the character map of London, and community or neighbourhood plans, in planning and designing new development. Proposed changes: The first sentence of Policy D1 'London's form and characteristics' should be amended to make specific reference to neighbourhood and community plans so that it reads 'Development Plans, area-based strategies, neighbourhood and community plans. and development proposals should address the following:' The phrase 'reflect and enhance local character and distinctiveness' should be added to the list after 1) in Policy D1A.
The first sentence of Policy HC1 'Heritage conservation and growth' should be revised so that it reads: 'Boroughs should, in consultation with Historic England, other relevant statutory organisations and local community and neighbourhood planning groups, develop evidence that demonstrates a clear understanding of London's historic environment, local character and distinctiveness.'

User: London Wildlife Trust

We welcome the broad principles of Policy D1 although it underplays the role of the natural environment in shaping London's form and character and is weak on its commitment to delivering the highest standards of sustainable design and construction. We recommend it makes stronger reference to ecology and the potential impacts to and opportunities to benefit the local natural environment, and recognise this is referenced under para 3.1.4 (Maximising urban greening). However, we suggest that this needs to be better embedded in the policy with the following amendments to Part B:

B Development design should:

3) aim for the highest sustainability standards
4) respect, enhance and utilise the heritage assets, ~~and~~ architectural features and natural environment that make up the local character
5) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water and secure ecological enhancements

User: Canal & River Trust

The Trust welcomes much of policy D1, in particular the focus on connectivity, inclusivity, safety and security, active frontages, social interaction and heritage assets.

We also welcome the need for the form and layout of a place to ‘help prevent or mitigate the impacts of noise and poor air quality’. The Trust is concerned that development alongside our waterways can create canyons that substantially limit the number of hours where daylight reaches the water space. One of the adverse impacts of this is that it limits the opportunity for boaters to use solar panels for electricity and heat generation and can increase the amount of time that they are reliant on sources of energy that lead to locally unwelcome emissions. We return to this issue in our response to policy D8.

We welcome the intention of part (B)(6) of policy D1 and suggest that, where relevant, its implementation should relate to comfortable and inviting environments for waterspace users where these are affected by development by, for example, wind or reductions in light. However, we question whether the requirement to ‘achieve comfortable and inviting environments… outside buildings’ is sufficiently clear. In the interests of providing clarity for decision makers, we suggest instead that the policy should state:

“achieve comfortable and inviting environments both inside ~~and outside~~ buildings and in the public realm affected by the development”.

User: London Environment Directors' Network (LEDNet)

Policy D1 London's form and characteristics

A

10) facilitate efficient servicing and maintenance of buildings and the public realm **– including for waste collections and recycling**, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users.

B

3) aim for high sustainability standards, **incorporating circular economy design principles wherever possible (see figure 3.1)**

B

3) needs to define 'sustainability standards', which should include air, climate and biodiversity objectives, and work alongside B 5) on urban greening.

User:	313-349 Ilderton Road LLP

Policy D1 London's form and characteristics sets out a list of criteria for development proposals to address relating to the form and layout of a place and development design.

The design principles included within the policy are generally similar to those set out in the adopted London Plan and as such we support the policy.

User: Catalyst Housing Limited

DESIGN

A number of the draft policies refer to the need to increase density in order to contribute to meeting growth needs. CHL agrees that this is needed, but remains concerned that many Boroughs, particularly but not exclusively the outer Boroughs where annual housing targets have been significantly increased, will not embrace this in the way envisaged by the Mayor. This may be less of an issue on schemes that are referable to the Mayor, as this will provide a clear mechanism to ensure site density is appropriately maximised. However, this will not be the case for non-referable schemes, and further guidance in the London Plan is needed. It may also be worth considering introducing minimum densities as a fall back, albeit with a clear expectation that densities should be higher than these. This should be reflected within draft Policies D1 and D6.

User: Benhill Residents

We propose:
(i) Policy D1(B)1 contradicts policy set out elsewhere –
including policy relating to Opportunity Areas. This section should also apply to Opportunity Areas ad large scale developments.

(ii) Policy D1(B)2 is, in part, about clear measurable standards and in part on subjective evaluations. We feel the policy should stick with clear measurable standards.

(iii) Issues such as designing out exposure to poor air quality, noise and crime, having good space standards and storage space, use of good quality construction materials, delivery of 150-year lifetime of buildings (at least), should be included in policy D1.

(iv) A matrix should be developed that facilitates assessment of adequate levels of green, play, youth and community infrastructure, affordable leisure facilities, local shops, services and amenities for any development - large of small. This should be based on delivering lifetime and walk able neighbourhoods.

User: The Royal Society for the Protection of Birds (RSPB)

Policy D1: London's form and characteristics (Chapter 4 housing)

We agree with policy D1 B 3) that development design should aim for high sustainability standards. However, in light of the scale of development proposed by the London Plan and recognising London's role as a City leader, we do not think this policy is sufficiently ambitious. Policy D1 should **require** new developments to be designed and built to the highest sustainability standards. Furthermore, **the expected standards should be defined**, e.g. through further guidance. Without this clarification there is a risk of inconsistent approaches and under-delivery of high sustainability standards.

We broadly agree that the form and layout of a place should provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity (Policy D1 *London's form and characteristics* paragraph A7). Having access to green and open space around developments is important for mental health and wellbeing and exercise. Crucially, the aim should be to design and build **high quality nature-rich** green and open spaces, which people will want to use and which will increase their contact with nature.

Suggested amendments to Policy D1 [amendments in bold, italics]

A7: The form and layout of a place should:

*7) provide conveniently located, **nature-rich**, green and open spaces for social interaction, play, relaxation and physical activity.*

User: Elaine Chambers

Policy D1 – London's form and characteristics

We propose:

(i) Policy D1(B)1 contradicts policy set out elsewhere – including policy relating to Opportunity Areas. This section should also apply to Opportunity Areas ad large scale developments.

(ii) Policy D1(B)2 is, in part, about clear measurable standards and in part on subjective evaluations. We feel the policy should stick with clear measurable standards.

(iii) Issues such as designing out exposure to poor air quality, noise and crime, having good space standards and storage space, use of good quality construction materials, delivery of 150-year lifetime of buildings (at least), should be included in policy D1.

(iv) A matrix should be developed that facilitates assessment of adequate levels of green, play, youth and community infrastructure, affordable leisure facilities, local shops, services and amenities for any development - large of small. This should be based on delivering lifetime and walkable neighbourhoods.

User: Silvertown Homes

No relevant definition of ‘character’ is provided in the draft London Plan.
Policy D1 states inter alia that:
‘B Development design should: 1) respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions’.
As supporting paragraph 3.11 makes clear, the intended meaning here is ‘physical character’.
However, Policy D2 when addressing plan-making states that this should be informed by an evaluation of ‘historical evolution and heritage assets (including an assessment of their significance and contribution to local character)’. Supporting paragraph 3.2.2 then implies character includes ‘social, cultural, physical and environmental influences’.
It must be clear that Policy D1 does not address the ‘cultural, social, economic, perceptions and experience’ meanings of character. Good planning means that architectural and urban design responses should, whilst responding to heritage considerations, focus on the future for a locality and for Londoners. Good planning should not be directed by the cultural, social or economic characteristics of a place (or the perceptions and experience of it) at a particular moment in time.

All relevant instances should explicitly define ‘character’ as ‘physical character’. The imperative to optimise development potential means there should be no ambiguity on this.
This includes:
? Policy SD1 Opportunity Areas
? Policy SD6 Town Centres
? Policy SD8 Town centres: development principles and Development Plan Documents
? Policy D1 London’s form and characteristics
? Paragraph 3.6.9
? Paragraph 3.7.3
? Policy D8 Tall buildings
? Policy H2 Small sites
? Paragraph 7.1.6

? Glossary definition of Strategic Views and paragraph 7.3.1

User: Silvertown Homes

The ability to deliver higher densities successfully rests with the local planning authorities and its Councillors. As per the above, the Mayor of London needs to be clear to local planning authorities and its Councillors that this is highly likely to result in a change in the physical character of some highly accessible town centres in the Outer Boroughs, which may not be received with a positive response.

Building on points made above, Part B 1) of Policy D1, which requires Development Design to respond to local context and to the scale, identity and character of the locality, is written in a manner that could be used to supress increased density and scale.

We therefore suggest that the actual wording of the policy should make it clear that opportunities to intensify the scale and density of development in high PTAL areas, in opportunity areas and in town centres should be actively encouraged, rather than relying on a general statement with no context, as set out in paragraph 3.1.1 which explains that ‘efficient use of land requires optimisation of density’.

We also recommend the Mayor of London produces a design guide that provides information on how these higher-density schemes can be delivered, using established precedents, to encourage LPA and developers to approach schemes with more confidence.

User:	Silvertown Homes

Policy D1 states that ‘development design should… aim for high sustainability standards’.

This statement should be removed as the relevant planning policy expectations are set out elsewhere across the Plan.

User:	Silvertown Homes

Policy D1 states that ‘respect, enhance and utilise the heritage assets and architectural features that make up the local character’.

The London Plan must define ‘utilise’. If the intended meaning is to make use of existing buildings where appropriate then this should be explicitly expressed

User: Royal London

Policy D1 – London's form and characteristics

RL are generally supportive of good design principles and the requirement of the policy to use land efficiently by optimising density amongst other considerations. However, we consider that the policy would benefit from amendments to provide more explicit reference and include the future character and potential of an area and the clear growth needs for all sectors established in the plan as a legitimate design considerations, alongside matters such as heritage for instance.

Such amendments are necessary to ensure that this key design policy is 'stitched' together with the rest of the Draft Plan. The current wording within part D1(B1) makes limited and insufficient reference to emerging street hierarchy as a design consideration where something more bolder and defined is required to ensure that a positive approach to intensification and growth is established in assessing the design merits of proposals.

User: Earls Court Public Sector Tenants' Assoc

We propose:

1. Policy D1(B)1 contradicts policy set out elsewhere – including policy relating to Opportunity Areas. This section should also apply to Opportunity Areas ad large scale developments.
2. Policy D1(B)2 is, in part, about clear measurable standards and in part on subjective evaluations. We feel the policy should stick with clear measurable standards.
3. Issues such as designing out exposure to poor air quality, noise and crime, having good space standards and storage space, use of good quality construction materials, delivery of 150-year lifetime of buildings (at least), should be included in policy D1.
4. A matrix should be developed that facilitates assessment of adequate levels of green, play, youth and community infrastructure, affordable leisure facilities, local shops, services and amenities for any development - large of small. This should be based on delivering lifetime and walkable neighbourhoods.

User: Historic England

Historic England supports this policy. The following aspects are particularly welcome:

- Part A 3) stating the form and layout of a place ‘should be **street-based’**

- Part B 1) and 4) requiring development to respond to local context, scale, identity and character of a locality and respect, enhance and utilise heritage assets and architectural features that make up local character. This aligns with paras 58 to 61 of the NPPF. The policy should be viewed as going hand in hand with the requirement to **conserve** the historic environment in policy HC1.

Supporting paragraph 3.1.2 is also helpful in stating that developments showing a clear understanding of, and relationship with, the context of the site are more likely to be successful.

We consider strengthening of the policy is nevertheless needed, in part A, to reflect the need for heritage considerations to be built into the master planning of schemes, informing and influencing the layout of developments for the better. For instance, the location of green space in areas of archaeological sensitivity can assist in preserving remains, and reinstating lost street patterns can restore coherence and historic legibility. For example the restoration of the medieval street within the Bloomberg building in the City – which had been obliterated by the earlier redevelopment – adds interest, celebrates London’s heritage and re-connects the street pattern. The amendment we propose would be consistent with later para 7.1.6 which helpfully highlights historic patterns and features as considerations in designing development layouts.

We suggest Part A includes a further criterion:

‘11) be based on an understanding of the heritage interest of the area, including its historic grain and archaeological interest.’

There is an opportunity here to provide a strategic steer as to different building typologies that could be considered as alternative forms to tall buildings.

(See later comments on policy D8)

User:	Living Streets

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

User: London Property Alliance

Policy D1 should be amended to remove the references to local context within Part B(1). This is highly subjective and could be applied to limit the scale of development to that of the existing area, which would not deliver the density and growth that is required.

We suggest Policy D1(B)(1) is amended as follows:

"[Development design should:] ~~respond to local context by delivering~~ deliver buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions."

Paragraph 3.1.2 should also be amended accordingly. This would be consistent with Policy D2(B) which seeks to ensure the most efficient use of land is made, to optimise development on all sites.

User:	PAFH - Physical Activity for Health (London Sport)

We strongly support these policies that maximise green and open space which encourage a range of activities that in turn will contribute towards improving health and wellbeing

User: Bishopsgate Goods Yard Regeneration Limited

The aspirations of Policy D1 are supported by our client. However, sections of the policy appear to be at odds with the wider aspirations of the draft London Plan. Part B1 states that development design should be *'of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions'.*

Whilst the principle of this is acceptable, there are a number of examples of where development have successfully challenged the existing character of the area. One of the main objectives of the draft London Plan is to increase density of development in appropriate areas. Given London's unique and organic built form, there are many instances where higher density development may be appropriate, but as a result will have to challenge the existing character of the area. We request that the wording of the policy be amended to acknowledge that new developments can challenge the existing identity and character of the locality, provided that it is done successfully to meet the wider objectives of the draft London Plan and incorporate exemplar design. It should not be forgotten that some of London's most iconic landmark buildings challenged the existing context.

User: Mr Paul McQuillen

The draft Plan gives insufficient consideration to the protection and enhancement of London's diverse local character. Policies D1 and and HC1 need to be amended to ensure that greater attention is given to the character map of London, and community or neighbourhood plans, in planning and designing new development. **Proposed changes:** The first sentence of Policy D1 'London's form and characteristics' should be amended to make specific reference to neighbourhood and community plans so that it reads;

'Development Plans, area-based strategies, neighbourhood and community plans. and development proposals should address the following:' The phrase **'reflect and enhance local character and distinctiveness'** should be added to the list after 1) in Policy D1A.

User:	Camden Town Conservation Area Advisory Committee

D1 B 4) Draft policy: [Development design should] ‘respect, enhance and utilise the heritage
assets and architectural features that make up the local character’

Our proposed amendments – reasoning: to ensure that the Plan is consistent with legislation and the NPPF.

Our proposed revised text: [Development design should] ‘respect, preserve and enhance and utilise the heritage assets and architectural features that make up the
local character’

User: Barratt Developments plc

The ability to deliver higher densities successfully rests with the local planning authorities and its Councillors. As per the above, the Mayor of London needs to be clear to local planning authorities and its Councillors that this is highly likely to result in a change in the physical character of some highly accessible town centres in the Outer Boroughs, which may not be received with a positive response.

Building on points made above, Part B 1) of Policy D1, which requires Development Design to respond to local context and to the scale, identity and character of the locality, is written in a manner that could be used to supress increased density and scale.

We therefore suggest that the actual wording of the policy should make it clear that opportunities to intensify the scale and density of development in high PTAL areas, in opportunity areas and in town centres should be actively encouraged, rather than relying on a general statement with no context, as set out in paragraph 3.1.1 which explains that ‘efficient use of land requires optimisation of density’.

We also recommend the Mayor of London produces a design guide that provides information on how these higher-density schemes can be delivered, using established precedents, to encourage LPA and developers to approach schemes with more confidence.

User:	Barratt Developments plc

Policy D1 states that ‘development design should… aim for high sustainability standards’

This statement should be removed as the relevant planning policy expectations are set out elsewhere across the Plan.

User:	Barratt Developments plc

Policy D1 states that ‘respect, enhance and utilise the heritage assets and architectural features that make up the local character’.

The London Plan must define ‘utilise’. If the intended meaning is to make use of existing buildings where appropriate then this should be explicitly expressed.

User: The British Library

Policy D1 – London’s form and characteristics

Utilising land efficiently through optimising density, connectivity and land use patterns, is an important point to emphasise when considering existing and future development within London (A1).

In addition, the need for development design to respond to local context is particularly important (B1). Whilst this does relate to the physical characteristics of a site, it should also relate carefully to existing land uses and functions adjacent to proposed development to ensure that the design responds carefully to local context.

User:	The Forestry Commission

We welcome:

Review of ALGG SPG but need to clarify links between ALGG and delivery of policies and Mayoral targets e.g. increase in tree canopy cover and increase in overall green cover. Maximising urban greening could benefit from making links to ALGG and its opportunities for connectivity (3.1.4)

User:	North London Waste Plan
In D1 support for statements in 3.1.10 and 3.1.11 about circular economy principles in construction	

User:	North London Waste Plan
In D1 support for statements in 3.1.10 and 3.1.11 about circular economy principles in construction	

User:	London Borough of Sutton

OBSERVATION. The London Borough of Sutton is concerned that Policy D1 pays insufficient regard to local character and townscape.The council is supportive of sustainable growth but considers that new development should successfully integrate within the townscape, particularly when considering small sites. In addition, the council considers that much of the policy includes detailed design matters which are not strategic issues and should be addressed at a local level.

User:	The Forestry Commission

D1 London's form & characteristics - in order to create a resilient city with resilient urban forest, the London Plan needs to recognise that the treescape will evolve over time. London’s urban forest needs to diversify in terms of tree species and composition where it is currently vulnerable, to create a future mature treescape that is valued but will look different to what we see now e.g. moving away from the avenues of London plane which are highly vulnerable to future threats.

User: Argent (Property Development) Services LLP

Draft Policy D1: London's form and characteristics

Part B 1) of the draft policy refers to responding to local context but contradicts part A 1) of the same policy (using land efficiently by optimising density) and other policies within the Draft London Plan, including draft policy SD1 part B 4), which recognises that areas can characterise their own character and density. In order to be effective, we would suggest the text is amended as follows:

*"~~respond to~~ **consider the** local **and emerging** context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, **the development objectives for the area as well as** ~~including to~~ existing and emerging street hierarchy, building types, forms and proportion*

User: CFGN Community Food Growers Network

The phrase ‘green and open spaces needs to be more closely defined so as not to be misinterpreted. As it stands it is ambiguous and open to interpretation. We know of examples where an area of ‘open space’ consists of concreted paving stones with a tree in the middle of it.

We suggest this policy should read:

Create, provide and maintain green and open spaces as defined below for varied and multifunctional uses such as informal recreation, social interaction, play, relaxation, physical activity, food growing as well as areas reserved for cultural or environmental retention that may provide some limited recreation opportunities

Suggested definition of ‘green spaces’ to include small areas of open space that are accessible to local residents, generally providing for recreation including passive recreation, children’s play and relaxation, which also can provide an identity and a sense of place for a community especially where it incorporates an important landscape feature or historic characteristic (Design Principle – Parks and Open Space: https://www.healthyplaces.org.au/userfiles/file/Parks%20and%20Open%20Space%20June09.pdf, http://www.greenspacescotland.org.uk/definition.aspx). They also include derelict, vacant and contaminated land which has the potential to be transformed (http://www.greenspacescotland.org.uk/definition.aspx)

Suggested definition of ‘open spaces’ is any open piece of land that is undeveloped (has no buildings or other built structures) and is accessible to the public. Open space can include green space (land that is partly or completely covered with grass, trees, shrubs, or other vegetation). Green space includes parks, community gardens, and cemeteries. Open space also includes schoolgrounds, playgrounds, public seating areas, public plazas, vacant lots, allotments and growing sites. (EPA https://www3.epa.gov/region1/eco/uep/openspace.html)

We believe that food growing spaces are vital green spaces and should be brought into the definition. They contribute positively through productive food growing, bringing community together, providing employment, lessening pollution both locally and in terms of air miles, contributing to local economy, giving people skills and training for employment, lessening isolation, supporting mental health problems and the costs that go with them, reducing waste and using it productively, and making the community more self sufficient and less dependant on services.

Henceforth, we believe that this is essential to the London Plan's over-arching good growth principles as amended in the CFGN submissions (See above for our amended GG1, GG2 and GG3) and as amended in the Just Space submission on Good Growth: GG1 (Building strong and inclusive communities), GG2 (Making the best use of land), GG3 (Creating a healthy city), GG5 (Growing a good economy), GG6 (Increasing efficiency and resilience)

User: CFGN Community Food Growers Network

D1

Although the transitioning of London to a Circular Economy is heavily weighted in the narrative (3.1.11) there is no specific policy that relates to it.

We suggest an addition policy in D1 which says:

C. All developments must be built following the principles of a Circular Economy; by assessing design, making, selling, re-using and recycling what we use including air, water, waste including human waste, household and the food chain to determine how to get the maximum value from them, both in use and at the end of their life as shown in Figure 3.1.

A Circular economy will be only partial without a deep and penetrating connection to the food chain which can be and needs to be incorporated

We suggest the following points be incorporated into the narrative of D1:

To promote a circular economy London Plan must:

- **Help provide services to food producers in and around cities, including technical training and financial assistance (credit, technology, food safety, market access, etc.) to build a multigenerational and economically viable food system with inputs such as compost from food waste, grey water from post-consumer use, and energy from waste etc. while ensuring that these do not compete with human consumption. (MUFPP, 2015)**
-

Provide policy and programme support for municipal public markets including farmers markets, informal markets, retail and wholesale markets, restaurants, and other food distributors, recognizing different approaches by cities working with private and public components of market systems. (MUFPP, 2015)

- **Improve and expand support for infrastructure related to market systems that link urban buyers to urban, peri-urban and rural sellers while also building social cohesion and trust, supporting cultural exchange and ensuring sustainable livelihood, especially for women and young entrepreneurs. (MUFPP, 2015)**

- **Acknowledge the informal sector's contribution to urban food systems (in terms of food supply, job creation, promotion of local diets and environment management) and provide appropriate support and training in areas such as food safety, sustainable diets, waste prevention and management.(MUFPP, 2015)**

Henceforth, we believe that this is essential to the London Plan's over-arching good growth principles as amended in the CFGN submissions (See above for our amended GG1, GG2 and GG3) and as amended in the Just Space submission on Good Growth: GG1 (Building strong and inclusive communities), GG2 (Making the best use of land), GG3 (Creating a healthy city), GG5 (Growing a good economy), GG6 (Increasing efficiency and resilience)

(See PDF for further detail)

User: Centre for London

Policy D1 London's form and characteristics

We endorse this policy.

· Our essay collection *Making Good* highlighted the importance of respecting local character.

· *Street Smarts: Report of the commission on the future of London's roads & streets* (2017) addressed the value of intelligent street design to establish a road space hierarchy and promote active travel:

User:	PRP
In the supporting text accompanying policy D1, paragraph 3.1.10 states that circular economy principles should be taken into account at the start of the design process. However the emerging plan should recognise that most Off Site Manufacture (OSM) building systems are inherently inflexible to future adaptation unless specific provision is "designed in" within specific typologies.	

User: One Housing Group

Draft policy D1: ‘London’s form and characteristics’

Part B 1) of the draft policy refers to responding to local context but it contradicts part A 1) of the policy (using land efficiently by optimising density) and other policies within the Draft Plan, including draft policy SD1 part B 4), which recognises that areas can define their own character and density. In order to be effective the text should therefore be amended as follows:

“B Development design should:

*1) **have regard** to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions. **Development can also set its own context provided it is of a high-quality design.**”*

User: Ms Deirdre Woods

D1.A.7

The phrase ‘green and open spaces needs to be more closely defined so as not to be misinterpreted. As it stands it is ambiguous and open to interpretation. We know of examples where an area of ‘open space’ consists of concreted paving stones with a tree in the middle of it or simply an area of grass which is not ecological in its maintenance requiring high inputs of chemical fertilisers and water.

I suggest this policy should read:

Create, provide **and maintain** green and open spaces **as defined below for varied and multifunctional uses such as informal recreation**, social interaction, play, relaxation, physical activity, **food growing as well as areas reserved for cultural or environmental retention that may provide some limited recreation opportunities**

Suggested definition of ‘green spaces’ to include small areas of open space that are accessible to local residents, generally providing for recreation including passive recreation, children’s play and relaxation, which also can provide an identity and a sense of place for a community especially where it incorporates an important landscape feature or historic characteristic (Design Principle – Parks and Open Space: https://www.healthyplaces.org.au/userfiles/file/Parks%20and%20Open%20Space%20June09.pdf, http://www.greenspacescotland.org.uk/definition.aspx). They also include derelict, vacant and contaminated land which has the potential to be transformed

(http://www.greenspacescotland.org.uk/definition.aspx)

Suggested definition of ‘open spaces’ is any open piece of land that is undeveloped (has no buildings or other built structures) and is accessible to the public. Open space can include green space (land that is partly or completely covered with grass, trees, shrubs, or other vegetation). Green space includes parks, community gardens, and cemeteries. Open space also includes schoolgrounds, playgrounds, public seating areas, public plazas, vacant lots, allotments and growing sites. (EPA https://www3.epa.gov/region1/eco/uep/openspace.html)

We believe that food growing spaces are vital green spaces and should be brought into the definition. They contribute positively through productive food growing, bringing community together, providing employment, lessening pollution both locally and in terms of air miles, contributing to local economy, giving people skills and training for employment, lessening isolation, supporting mental health problems and the costs that go with them, reducing waste and using it productively, and making the community more self sufficient and less dependant on services.

I believe that this is essential to the London Plan's over-arching good growth principles: GG1 (Building strong and inclusive communities), GG2 (Making the best use of land), GG3 (Creating a healthy city), GG5 (Growing a good economy), GG6 (Increasing efficiency and resilience).

User: Persimmon Homes

Part B 1) is unsound because it requires design to correspond to the “scale” the “form” and “proportions” of the locality. This is at odds with recognition that to deliver the anticipated housing growth their will need to be optimised density that exceeds existing that prevailing within an area.
Part B 1) should be re-drafted to read:

“B Development design should:
1) Respond to local context by delivering buildings and spaces that are positioned and of the appearance that is respectful of the identity and character of the locality. The local planning authorities in determining applications should not refuse applications on the grounds that the density and height of the buildings proposed is out of with that of the local area unless there is identifiable harm arising which outweighs the positive benefits of the scheme, including the aim of optimising density.”

Part B 3) is unsound and should be deleted because it is unclear what is being sought and how assessment against this policy would be made.

User: Ms Deirdre Woods

D1

Although the transitioning of London to a Circular Economy is heavily weighted in the narrative (3.1.11) there is no specific policy that relates to it.

I suggest an addition policy in D1 which says:

C. All developments must be built following the principles of a Circular Economy; by assessing design, making, selling, re-using and recycling what we use including air, water, waste including human waste, household and the food chain to determine how to get the maximum value from them, both in use and at the end of their life as shown in Figure 3.1.

A Circular economy will be only partial without a deep and penetrating connection to the food chain which can be and needs to be incorporated

I suggest the following points be incorporated into the narrative of D1:

To promote a circular economy London Plan must:

- **Help provide services to food producers in and around cities, including technical training and financial assistance (credit, technology, food safety, market access, etc.) to build a multigenerational and economically viable food system with inputs such as compost from food waste, grey water from post-consumer use, and energy from waste etc. while ensuring that these do not compete with human consumption. (MUFPP, 2015)**

- **Provide policy and programme support for municipal public markets including farmers markets, informal markets, retail and wholesale markets, restaurants, and other food distributors, recognizing different approaches by cities working with private and public components of market systems. (MUFPP, 2015)**

- **Improve and expand support for infrastructure related to market systems that link urban buyers to urban, peri-urban and rural sellers while also building social cohesion and trust, supporting cultural exchange and ensuring sustainable livelihood, especially for women and young entrepreneurs. (MUFPP, 2015)**

- **Acknowledge the informal sector's contribution to urban food systems (in terms of food supply, job creation, promotion of local diets and environment management) and provide appropriate support and training in areas such as food safety, sustainable diets, waste prevention and management.(MUFPP, 2015)**

I believe that this is essential to the London Plan's over-arching good growth principles: GG1 (Building strong and inclusive communities), GG2 (Making the best use of land), GG3 (Creating a healthy city), GG5 (Growing a good economy), GG6 (Increasing efficiency and resilience).

User:	CFGN Community Food Growers Network
Amendments	Justification
Insert '*food growing'* into 'should provide open space for social interaction, play, relaxation and activity.'	**In major development residents should have access to communal gardens, to connect with nature, enjoy plants and have the opportunity to engage in growing.**

User: CFGN Community Food Growers Network

	Amendments	Justification
Para 3.1.4 Page 100	Expand this section on the benefits of urban greening, to reference the health and social benefits of urban greening and food growing.	The draft New London Plan does not recognise the role that integrating food growing spaces and edible planting into the landscape can provide, beyond commercial food production.

User: Croydon Limited Partnership

Chapter 3 of the draft London Plan is concerned with design and Policy D1 considers London's form and characteristics. Section A of the policy states that development proposals should use land efficiently by optimising density. In addition, Section B(1) considers that development design should: *"respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions".*

CLP supports the approach proposed at Section A to optimise density within development proposals. However, Section B(1) of the policy could be contradictory to achieving this objective as well as other objectives set out elsewhere in the Plan.

Policy SD1 B(4) states that Boroughs should recognise that "*larger areas can define their own character and density"*, whilst paragraph 3.6.1 identifies that in order to make the most efficient use of land this will mean: *"developing at densities above those of the surrounding area on most sites".* New development should of course have regard to the local context, however, the policy as currently drafted could lead to development being constrained by surrounding building typology, scale and height. If higher densities are to be realised in appropriate locations then development will step beyond the existing context but only in an acceptable manner once justified giving regard to scale, height and density.

Policy D1 should make specific reference to Policy SD1 to note the contribution that larger sites can have in defining their own character, rather than simply responding to the character of their surroundings. Alternatively, the text should be amended to reinforce the approach identified in paragraph 3.6.1, that responding to surrounding context should not constrain the ability to optimise density.

User: Croydon Limited Partnership

Chapter 3 of the draft London Plan is concerned with design and Policy D1 considers London's form and characteristics. Section A of the policy states that development proposals should use land efficiently by optimising density. In addition, Section B(1) considers that development design should: *"respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions".*

CLP supports the approach proposed at Section A to optimise density within development proposals. However, Section B(1) of the policy could be contradictory to achieving this objective as well as other objectives set out elsewhere in the Plan.

Policy SD1 B(4) states that Boroughs should recognise that "*larger areas can define their own character and density"*, whilst paragraph 3.6.1 identifies that in order to make the most efficient use of land this will mean: *"developing at densities above those of the surrounding area on most sites".* New development should of course have regard to the local context, however, the policy as currently drafted could lead to development being constrained by surrounding building typology, scale and height. If higher densities are to be realised in appropriate locations then development will step beyond the existing context but only in an acceptable manner once justified giving regard to scale, height and density.

Policy D1 should make specific reference to Policy SD1 to note the contribution that larger sites can have in defining their own character, rather than simply responding to the character of their surroundings. Alternatively, the text should be amended to reinforce the approach identified in paragraph 3.6.1, that responding to surrounding context should not constrain the ability to optimise density.

User:	Blackheath Society

Policy D1 London's form and characteristics: Whilst we agree with the thrust of this policy, the repeated references to 'optimising' land use should not be seen as synonymous with increasing density ('optimising' should not equate to 'maximising'). Ambiguity of this kind is not helpful and will reduce rather than increase clarity in the planning environment. Whilst there may be a case for increasing density of development in a number of instances, there should be a requirement for this case to be made in the light of local circumstances.

User: North London Waste Authority

- NLWA recognises the importance and usefulness of BREEAM as an appropriate metric for building sustainability but we would like the NLP to include a caveat such that it is not essential for every building to reach the highest possible BREEAM standards. There is a need for buildings to be designed for fitness for purpose (e.g. it is unlikely to be necessary for an appropriately located industrial warehouse to reach BREEAM 'excellent', and such a requirement might be a barrier to investment that could otherwise deliver wider circular economy benefits to the community).
- Longevity and lifecycle thinking should be incorporated into the NLP approach to buildings design and build. New buildings provide an opportunity for using recycled construction materials, to stimulate demand for recycled construction materials in accordance with circular economy principles. NLWA recommends that the NLP should more explicitly recognise the contribution that buildings themselves can make to a circular economy within the capital. In our response to the Draft London Environment Strategy (DLES) for example we noted that _more could be done to support the use of secondary aggregates from the bottom ash at energy recovery facilities both by private developers through new provisions in the London Plan and by Tfl

  and other members of the GLA group when commissioning construction works .

User: North London Waste Authority

NLWA notes and supports this ambition. It is sufficiently significant for us to suggest that this text is set out as a separatepolicy within the NLP rather than being included in the body text as currently.

- Borough design code principles also need to be taken into consideration in any recommendation about storage for waste. We would argue that these on-site waste storage facilities (for both recycling and residual waste) can be communal, as long as walking distances to the containers aren't too great and the total capacity is sufficient for weekly collections so that collection authorities don't consequently have to bear the cost of more frequent collections for relevant waste streams .

User: North London Waste Authority

- We welcome the inclusion of circular economy thinking ·into the NLP. However, we recommend that the GLA produces an implementation manual for borough planners and developers; otherwise we are concerned about how they will assess conformity. An implementation manual would also assist because predictability about the requirements for investment in circular economy developments will help investment, as noted above.

- NLWA recommends that the NLP should take a strong position about the requirement for comprehensive circular economy design principles to be included in new developments. These requirements should be discussed with relevant construction industry trade bodies and be in line with the London Waste and Recycling Board's (LWARB's) Circular Economy Routemap..
- NLWA also recommends that the requirements to design out waste during construction and to use recycled material in new buildings should be itemised separately within the list. One of these requirements is about designing out waste, the other is about driving recycling- they are different things and both are necessary.

User:	Barnet Society

Policy D1 – London’s form and characteristics

We strongly support the importance of high standards of design and sustainability, both for buildings and external spaces. We agree with the Mayor’s list of considerations for form, layout and design development.

User: Brent Cross Cricklewood Development Partners

Chapter 3 of the draft London Plan is concerned with design and Policy D1 considers London's form and characteristics. Section A of the policy states that development proposals should use land efficiently by optimising density. In addition, Section B(1) considers that development design should: *"respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions".*

The DPs support the approach proposed at Section A to optimise density within development proposals. However, Section B(1) of the policy could be contradictory to achieving this objective as well as other objectives set out elsewhere in the Plan.

Policy SD1 B(4) states that Boroughs should recognise that "*larger areas can define their own character and density"*, whilst paragraph 3.6.1 identifies that in order to make the most efficient use of land this will mean: *"developing at densities above those of the surrounding area on most sites".* New development should of course have regard to the local context, however, the policy as currently drafted could lead to development being constrained by surrounding building typology, scale and height. If higher densities are to be realised in appropriate locations then development will step beyond the existing context but only in an acceptable manner once justified, giving regard to scale, height and density.

Policy D1 should make specific reference to Policy SD1 to note the contribution that larger sites can have in defining their own character, rather than simply responding to the character of their surroundings. Alternatively, the text should be amended to reinforce the approach identified in paragraph 3.6.1, that responding to surrounding context should not constrain the ability to optimise density.

User:	Metropolitan Police Service

Strategic Policy D1 London’s form and characteristics:
Development Plans, area-based strategies and development proposals should address the following:
A The form and layout of a place should:
5) achieve safe and secure environments –
The MPS ask that this be amended to: “achieve safe environments that are resilient to crime and anti-social behaviour, by actively engaging in the police Secured by Design process”.
6) provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest.
The MPS agrees in principle.
8) encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples’ movement patterns and desire lines in the area
The MPS ask this paragraph be amended to: “encourage and facilitate crime free active travel through the provision of safe and secure infrastructure with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking and legible entrances to buildings that are aligned with peoples’ movement patterns and desire lines in the area, especially during the hours of darkness”
B Development design should:
3) aim for high sustainability standards
The MPS agree in principle, as successful Secured by Design certification and the use of enhanced certified security products actively promotes sustainability in terms of reduced carbon costs over time
3.1.5 Measures to design out crime should be integral to development proposals and be considered early in the design process. Development should reduce opportunities for antisocial behaviour, criminal activities, and terrorism, and contribute to a sense of safety without being overbearing or intimidating. Developments should ensure good natural surveillance, clear sight lines, appropriate lighting, logical and well-used routes and a lack of potential hiding places.
The MPS ask this paragraph be amended to: “Measures to design out crime according to the Secured by Design scheme, should be integral to development proposals and be considered early in the design process. Development should reduce opportunities for anti-social behaviour, criminal activities, and terrorism, and contribute to a sense of safety in a sustainable and positive manner. Developments should include good natural surveillance, clear sight lines, appropriate lighting, logical and well-used routes and a lack of potential hiding places.”

User: Aitch Group

My client fully supports the aspirations of these policies and are committed to delivering good design. They invest in architects and design teams that have a proven track record of delivering good design.

In many instances, they will go further than the minimum design standards, such as in relation to minimum unit size and floor to ceiling heights to differentiate themselves from the rest of the market and provide a better-quality product.

However, and consistent with the comments made above, the policies need to reflect that a step change isrequired for housing development to increase density and deliver the required level of housing.

Too often schemes are refused permission because they do not reflect existing building typologies, particularly in relation to height and massing.

It is entirely possible to achieve very high standards of design in buildings that are bigger/ taller than their neighbours. London is full of such examples.

This policy should be forward looking and seek to deliver the highest standards of design at high densities without being constrained by historic form where it can be demonstrated there are no adverse impacts on heritage assets or neighbouring amenity.

User: Landscape Institute London

Policy D1 London’s form and characteristics

Whilst these principles are fine in themselves, LI London considers that whilst they generally echo current Urban Design principles in a positive way, there is little in this entire chapter that is specific to London. However, the Design chapter does appear to integrate well with issues outlined in other chapters.

Whilst there is mention of design quality, context, heritage and distinctiveness, apart from a reference to ‘attractive, resilient places’, rather oddly linked to management of surface water (D1, B5), there is no mention in the London Plan of beauty, delight and the creation of inspiring places that people will take pleasure in visiting, or instil pride to live in a particular neighbourhood. LI London believes that it is important not to lose sight of these factors despite the pressure for housing development. It is possible to incorporate such value without adding cost. Communities need more than housing to develop into viable neighbourhoods.

Whilst it is accepted that duplication of policy should be avoided, LI London suggests that as a minimum there should be a cross-reference to Chapter 8 to emphasise that open spaces and green infrastructure are an intrinsic and interconnected part of London, especially now that London will be the first National Park City.

User:	Landscape Institute London

3.1.4 LI London is pleased to see a recommendation for ‘maximising urban greening’ and the creation of green open spaces, to help ameliorate the effects of climate change as well as place-making, ecological and connectivity benefits.

3.1.4, 3.2.8, D7 A and elsewhere - the word ‘landscaping’ should be replaced by landscape treatment, equivalent to ‘architectural treatment’. ‘Landscaping’ is a catch-all term with little meaning. Also it implies that ‘landscaping’ is detached from other elements and potentially seen as an optional add-on. If more planting is meant, then say so.

User:	London Sustainable Development Commission
Strengthen reference in D1B3 to *achieve* high sustainability standards and include cross reference to new additional policy in the Design Chapter and relevant policies in Sustainable Infrastructure.	

User:	Arup Building Engineering Team
We support the importance placed on mitigating the impacts of noise and poor air quality. However, these are only two of many important aspects contributing to the overall microclimate quality in town centres. It would be beneficial to explicitly reference daylight/sunlight and environmental wind conditions.	

User: Highgate Society

Support and object

The intentions are very good, but this policy is too general and seemingly not linked to any standards or actual size/detailing/process requirements. The below points require not only a good architect/planner, but also very capable people in the councils and clients that are ambitions on behalf of design. Since design is also a major concern for local communities, early pre-application consultation with communities is essential and must be required in the Plan. Very little of the below is measurable, and it will therefore be up to the developer and the case officer to determine what "good design" is since this is all too often a subjective decision, based more on resources and development profits than on appropriateness for the setting, this makes early community engagement all the more important.

D1B(1*)* Object

This policy directly contradicts D6 tall buildings. We cannot see how tall buildings can deliver building that are of scale. Too often these are placed in localities adjacent to rows of 2 and 3 storey housing or adjacent to open spaces. It is also difficult to see how a tall building can respond to street hierarchy

D1B (2) Support and Comment

This is supported but the problem which exists is how it will be achieved for the whole process. Hopefully D2H will resolve this

D1B (4) Object

The policy covering the “respect, enhance and utilise” Heritage Assets needs strengthening to “preserve” heritage assets

User:	Natural England

Natural England supports the measures to maximise urban greening through development design within this policy. We would also recommend an additional measure under B of this policy to make provisions for development design to seek opportunities for the incorporation of features to support biodiversity, including swift bricks, bat boxes and house sparrow terraces.

When taken together, the form of London’s buildings and open spaces generate a distinctive landscape character. The design of new development within London, and the construction of tall buildings in particular, has the capacity to impact upon the London’s landscape character.

User:	Natural England

We recommend:

An amendment to the text of B.1 to read ‘Development design should… respond to local context **and the wider character of London’s landscape** by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions,

User:	Natural England
An amendment added to the end of paragraph 3.1.2 to read '…Creating a comfortable pedestrian environment with regard to levels of sunlight, shade, wind, and shelter from precipitation is important. **The Landscape Institute's Townscape Character Assessment methodology and Natural England's 'London's Natural Signatures' report provide useful resources to inform these evaluations, and planners should therefore be referred to these documents.**	

User: London Chamber of Commerce and Industry

Policy D1 London’s form and characteristics

44. LCCI recognises the need to use land efficiently by optimising density. However, this must be done in areas where there is the maximum potential for utilising existing infrastructure. As a result, increasing housing density around local transport hubs should be prioritised. Increasing housing density around train stations and other commuter hubs would reduce reliance on private forms of transport and make it easier for more people to commute to where they need to go.

45. However, with all new developments, especially those that increase density, management will be essential. We note the Mayor’s commitment for new developments to be designed and managed so that deliveries can be conducted with minimal disturbance. Freight plays a vital, if not always appreciated role, in our everyday lives. From stocking high street shelves to supplying materials to sustain a growing population, demands on the freight industry have never been higher.

46. In 2016, LCCI cautioned against proposals that had appeared for a peak time lorry/HGV ban in the capital. Our campaign ‘no ban without a plan22’ highlighted the often poorly understood role of freight and the unintended consequences of bans without complementary measures to address the demand that generated those vehicle movements in the first place (e.g. the likelihood that a large number of white vans would replace a smaller number of HGVs at certain times of the day, potentially adding to pollution and congestion).

47. The capital requires 66,000 new homes every year – however this will require lorries supplying the building and development material. One average sized three-bedroom house requires at least 34 freight vehicle movements to be brought into existence23. Making lorry movements more expensive will increase the bill to build. Banning lorry movements at key times of the day will serve to prolong project duration.

48. The freight industry, within LCCI membership, is ready to explore different options to achieve a sensible balance between public and commercial needs. This must include efforts to boost consolidation and improve efficiency to reduce the number of unnecessary journeys made into central London.

49. A recent poll of businesses for LCCI found 87% agreed that grouping parcels for companies or buildings would help reduce businesses' impact on congestion, with a similar number believing flexible working hours would make a difference, and over four fifths backing businesses working together on waste collection.

50. The Mayor should appoint a Freight Commissioner to lead a vision for enabling a world-class freight and logistics environment in the capital24.

User:	Chairs of Camden's Conservation Area Advisory Committees

D1 A after 4) Our proposed revised text: ADD new ‘5) ‘preserve or enhance heritage assets’

D1 B 4) Draft policy: [Development design should] ‘respect, enhance and utilise the heritage assets and architectural features that make up the local character’
Our proposed amendments – reasoning: to ensure that the Plan is consistent with legislation and the NPPF.
Our proposed revised text: [Development design should] ‘respect, preserve and enhance and utilise the heritage assets and architectural features that make up the local character’

User: CIBSE

We broadly support the objectives, including preventing and mitigating the impacts of noise and poor air quality, aiming for high sustainability standards, creating comfortable environments and maximizing opportunities for urban greening for resilience and surface water management.

We notice that the Policy does not directly refer to energy efficiency or to the indoor environment. However the form and characteristics of London's buildings has a fundamental impact on the ability to provide low carbon, healthy, comfortable adaptable and resilient homes, workplaces and public buildings.

Successfully delivering Policy G6 is inextricably linked with Policy D1.

Where possible these intents need to be linked to clear measurable objectives, with reporting and monitoring. We have commented in more detail on individual policies throughout our response.

We would also encourage green areas to be accessible and visible where possible, in order to maximise their benefits for urban dwellers.

See also response to Chapter 8 Green Infrastructure and Natural Environment.

User: DPDgroup UK Ltd

Policy D1 - London’s form and characteristics

Design needs to include the facility for mixed-use occupation that may require a quasi hybrid planning classification. Best practice effective examples of underground logistics operation exist in Paris operated by the Chronopost parcel company.

DPD is already working to allow recipients of parcel to retime deliveries to ensure first time delivery success through its iOS and Android app. The CEP sector has well developed extensive pick up shop locations that allow recipients to retime to suit them. Mandatory retiming could have a significant negative impact on the CEP sector and would remove flexibility within the operation.

User:	Sustrans
D1 A – London’s form and characteristics Welcome the factors 1 – 10 that should guide the initial evaluation of development sites, particularly those that support active travel, including connectivity and land-use patterns, an inclusive environment, safe and secure environments, active frontages, green and open space, and reducing freight and servicing. We strongly support the inclusion of A8, which identifies how design should encourage and facilitate active travel.	

User:	Sustrans
Welcome indication that design and layout should reduce the dominance of cars and provide permeability to support active travel.	

User: Mx Beth Stewart

D1.A.7

The phrase ‘green and open spaces needs to be more closely defined so as not to be misinterpreted. As it stands it is ambiguous and open to interpretation. We know of examples where an area of ‘open space’ consists of concreted paving stones with a tree in the middle of it.

We suggest this policy should read:

Create, provide **and maintain** green and open spaces **as defined below for varied and multifunctional uses such as informal recreation,** social interaction, play, relaxation, physical activity**, food growing as well as areas reserved for cultural or environmental retention that may provide some limited recreation opportunities**

Suggested definition of ‘green spaces’ to include small areas of open space that are accessible to local residents, generally providing for recreation including passive recreation, children’s play and relaxation, which also can provide an identity and a sense of place for a community especially where it incorporates an important landscape feature or historic characteristic (Design Principle – Parks and Open Space: https://www.healthyplaces.org.au/userfiles/file/Parks%20and%20Open%20Space%20June09.pdf, http://www.greenspacescotland.org.uk/definition.aspx). They also include derelict, vacant and contaminated land which has the potential to be transformed

(http://www.greenspacescotland.org.uk/definition.aspx)

Suggested definition of ‘open spaces’ is any open piece of land that is undeveloped (has no buildings or other built structures) and is accessible to the public. Open space can include green space (land that is partly or completely covered with grass, trees, shrubs, or other vegetation). Green space includes parks, community gardens, and cemeteries. Open space also includes schoolgrounds, playgrounds, public seating areas, public plazas, vacant lots, allotments and growing sites. (EPA https://www3.epa.gov/region1/eco/uep/openspace.html)

We believe that food growing spaces are vital green spaces and should be brought into the definition. They contribute positively through productive food growing, bringing community together, providing employment, lessening pollution both locally and in terms of air miles, contributing to local economy, giving people skills and training for employment, lessening isolation, supporting mental health problems and the costs that go with them, reducing waste and using it productively, and making the community more self sufficient and less dependant on services.

We believe that this is essential to the London Plan's over-arching good growth principles (as amended by CFGN and Just Space): GG1 (Building strong and inclusive communities), GG2 (Making the best use of land), GG3 (Creating a healthy city), GG5 (Growing a good economy), GG6 (Increasing efficiency and resilience).

User: Mx Beth Stewart

D1

Although the transitioning of London to a Circular Economy is heavily weighted in the narrative (3.1.11) there is no specific policy that relates to it.

We suggest an addition policy in D1 which says:

C. All developments must be built following the principles of a Circular Economy; by assessing design, making, selling, re-using and recycling what we use including air, water, waste including human waste, household and the food chain to determine how to get the maximum value from them, both in use and at the end of their life as shown in Figure 3.1.

A Circular economy will be only partial without a deep and penetrating connection to the food chain which can be and needs to be incorporated

We suggest the following points be incorporated into the narrative of D1:

To promote a circular economy London Plan must:

- **Help provide services to food producers in and around cities, including technical training and financial assistance (credit, technology, food safety, market access, etc.) to build a multigenerational and economically viable food system with inputs such as compost from food waste, grey water from post-consumer use, and energy from waste etc. while ensuring that these do not compete with human consumption. (MUFPP, 2015)**
- **Provide policy and programme support for municipal public markets including farmers markets, informal markets, retail and wholesale markets, restaurants, and other food distributors, recognizing different approaches by cities working with private and public components of market systems. (MUFPP, 2015)**
- **Improve and expand support for infrastructure related to market systems that link urban buyers to urban, peri-urban and rural sellers while also building social cohesion and trust, supporting cultural exchange and ensuring sustainable livelihood, especially for women and young entrepreneurs. (MUFPP, 2015)**

- **Acknowledge the informal sector’s contribution to urban food systems (in terms of food supply, job creation, promotion of local diets and environment management) and provide appropriate support and training in areas such as food safety, sustainable diets, waste prevention and management.(MUFPP, 2015)**

We believe that this is essential to the London Plan's over-arching good growth principles (as amended by CFGN and Just Space): GG1 (Building strong and inclusive communities), GG2 (Making the best use of land), GG3 (Creating a healthy city), GG5 (Growing a good economy), GG6 (Increasing efficiency and resilience).

User: Design Council

Inclusive Environments

38. Creating inclusive environments is central to Design Council work. The built environment can contribute to a more equal, inclusive and cohesive society if the places where we live, the facilities we use and our neighbourhoods and meeting places are designed to be accessible and inclusive.

39. Inclusive places are those where people feel proud to live, businesses choose to invest and the public want to visit. However physical, social, cultural and economic inequalities are still being literally built into new places, with evidence showing that inclusive principles are not being adopted and implemented consistently.[3]

40. We therefore welcome the requirement for the design of inclusive places set out in Policy D1, connecting firstly to the Mayor ambition to build a city where all Londoner's reap the rewards of the city. An inclusive environment is vital to achieving this. It is an environment where everyone can access and live safely, easily and with dignity by all. The diverse needs of the population should be accommodated by mainstream design. People should not have to experience segregation or separate, special treatment due to the design of the environment.

41. Inclusive design is the responsibility of everyone who works in the built environment: planners, those who commission new buildings and places, access consultants, designers, architects, engineers, surveyors, property owners and facilities managers. Our Inclusive Environments CPD training programme will encourage the UK's highly skilled professionals to continue leading the way in building the most accessible and inclusive country in the world.

[3] Design Council CABE (2008), Inclusive by Design, {online}

User:	Hornsey & Wood Green Labour Party

We welcome the area-based strategies and development proposals with the emphasis on: optimising density, being street based, using green and open spaces with pedestrian and cycles facilities and highlighting the importance of waste management.

User:	Landsec

Policy D1. We suggest that the policy wording is revised to ensure that it is clear that requirements to respect local context cannot be applied to prevent the capacity of sites from being optimised.

User:	Redrow Homes London Division.
The draft London Plan is prescriptive in terms of design and how to approach design matters at the application stage. In many respects what is set out in policy represents opinion on best practice. The draft London Plan should undergo significant review to ensure it is the strategic planning document sought by legislation.	

User:	Mr Timothy Gill

Para 3.1.2 – in order to avoid the unnecessary gating of communities, which can restrict movement and does not facilitate an inclusive environment (Policy D1 A 2), the following sentence should be added:

Shared spaces within developments should be designed and accessible for all ages to use for social activity, play, rest and recreation (see Policy S4 Play and Informal Recreation).

User: Mr Timothy Gill

Para 3.1.5 - It is good to see a reference to ‘good natural surveillance.’ The point could be made more achievable if it was made clearer that ‘well-used routes’ do not need to be busy with cars. In a local residential setting, people are more likely to feel safe and to move around actively within their neighbourhood (as the Healthy Streets approach advocates) if a route is *not* well-used by cars. This could be clarified by changing the wording to ‘*well-used routes by pedestrians and cyclists’* or remove all together as it is covered in para 3.1.6 as well.

User: Redrow Homes London Division.

No relevant definition of ‘character’ is provided in the draft London Plan.

Policy D1 states
Policy D1 states inter alia that:
‘B Development design should: 1) respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions’.

As supporting paragraph 3.11 makes clear, the intended meaning here is ‘physical character’.

However, Policy D2 when addressing plan-making states that this should be informed by an evaluation of ‘historical evolution and heritage assets (including an assessment of their significance and contribution to local character)’. Supporting paragraph 3.2.2 then implies character includes ‘social, cultural, physical and environmental influences’.

It must be clear that Policy D1 does not address the ‘cultural, social, economic, perceptions and experience’ meanings of character. Good planning means that architectural and urban design responses should, whilst responding to heritage considerations, focus on the future for a locality and for Londoners. Good planning should not be directed by the cultural, social or economic characteristics of a place (or the perceptions and experience of it) at a particular moment in time.

All relevant instances should explicitly define ‘character’ as ‘physical character’. The imperative to optimise development potential means there should be no ambiguity on this.
This includes:
? Policy SD1 Opportunity Areas
? Policy SD6 Town Centres

? Policy SD8 Town centres: development principles and Development Plan Documents
? Policy D1 London’s form and characteristics
? Paragraph 3.6.9
? Paragraph 3.7.3
? Policy D8 Tall buildings
? Policy H2 Small sites
? Paragraph 7.1.6
? Glossary definition of Strategic Views and paragraph 7.3.1

User: Mr Timothy Gill

Para 3.3.3 – security measures can often inadvertently restrict the usage of spaces, leading to spaces that are no longer inclusive and that restrict the movement of users, particularly children who may then not be able to access a space without adult assistance. The following sentence should added:

Security measures should not restrict children's independent mobility; children and young people should be free to access shared and communal spaces without adult assistance or supervision.

User: Redrow Homes London Division.

The ability to deliver higher densities successfully rests with the local planning authorities and its Councillors. As per the above, the Mayor of London needs to be clear to local planning authorities and its Councillors that this is highly likely to result in a change in the physical character of some highly accessible town centres in the Outer Boroughs, which may not be received with a positive response.

Building on points made above, Part B 1) of Policy D1, which requires Development Design to respond to local context and to the scale, identity and character of the locality, is written in a manner that could be used to supress increased density and scale.

We therefore suggest that the actual wording of the policy should make it clear that opportunities to intensify the scale and density of development in high PTAL areas, in opportunity areas and in town centres should be actively encouraged, rather than relying on a general statement with no context, as set out in paragraph 3.1.1 which explains that ‘efficient use of land requires optimisation of density’.

We also recommend the Mayor of London produces a design guide that provides information on how these higher-density schemes can be delivered, using established precedents, to encourage LPA and developers to approach schemes with more confidence.

User:	Redrow Homes London Division.

Policy D1 states that ‘development design should… aim for high sustainability standards’.

This statement should be removed as the relevant planning policy expectations are set out elsewhere across the Plan.

User:	Redrow Homes London Division.
Policy D1 states that ‘respect, enhance and utilise the heritage assets and architectural features that make up the local character’. The London Plan must define ‘utilise’. If the intended meaning is to make use of existing buildings where appropriate then this should be explicitly expressed.	

User: London Parks and Gardens Trust

• Policy D1 A7 and A9 The Trust welcomes the principle of making sure Development Plans address the location of green and open spaces are conveniently located for social interaction but would urge more tie in with the fact that parks help prevent or mitigate the impacts of noise and poor air quality *as well as flooding.*

• Policy D1 B Development Designs - 5 we suggest a rewrite as follows:

5) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water ***and absorption of air pollution and noise pollution?***

User:	London Parks and Gardens Trust

The Trust endorses statement 3.1.4 but urges the Mayor to note that a green corridor is not a substitute for provision of well designed landscapes of a more significant size that enable children to play.

User: Sean Creighton

Policy D1 London's form and characteristics

44. The design aims are welcome, especially the stress on the importance of green spaces, given the way in which Croydon Council's Brick by Brick developer is seeking to build on such spaces e.g. Coombe/Edridge Rds, next to a listed building Ruskin House, which is opposed by Croydon TUC and Croydon Assembly because small greens spaces are important to the character and amenity of neighbourhoods.

User: Andrea Carey Fuller

1. Policy D1(B)1 contradicts policy set out elsewhere – including policy relating to Opportunity Areas. This section should also apply to Opportunity Areas and large scale developments.
2. Policy D1(B)2 is, in part, about clear measurable standards and in part on subjective evaluations. We feel the policy should stick with clear measurable standards.
3. Issues such as designing out exposure to poor air quality, noise and crime, having good space standards and storage space, use of good quality construction materials, delivery of 150-year lifetime of buildings (at least), should be included in policy D1.
4. A matrix should be developed that facilitates assessment of adequate levels of green, play, youth and community infrastructure, affordable leisure facilities, local shops, services and amenities for any development - large of small. This should be based on delivering lifetime and walkable neighbourhoods.

User: eCountability Ltd

Policy D1 London’s form and characteristics

We support this policy. We regard the following sections of the policy as being of particular importance, in that they deliver part of the commitment in the government’s 25 Year Environment Plan to ensure high environmental standards for new builds:

D1 A7 Conveniently located green and open spaces

D1 A8 Active travel

D1 A9 Noise and poor air quality mitigation

D1 B1 Local context

D1 B3 Sustainability standards

D1 B5 Urban greening opportunities

These policies can be described collectively as supporting the delivery of ecosystem services, including cultural services (e.g. outdoor recreation, amenity, access to nature) and regulating services (e.g. mitigation of poor air quality, noise, flood risk from surface water). All of these services, which flow from green infrastructure in the city context, are essential to people’s wellbeing. Many of them will be under extreme pressure in the lifetime of the London Plan through the effects of climate change.

User:	Oneill Homer

D1 Neighbourhood plans offer a local scale to refine generic design guidance to apply to a local area. This will be especially valuable in have to take into account opportunities to densify and redevelopment to change land use mix in established areas.

User:	Public Health England

Infrastructure and environment

? Policy D1 on London’s form and characteristics covers a range of issues and areas relating to form and characteristics but sadly doesn’t refer to supporting health and well-being. It is suggested that an additional clause under A could be added 11 support mental and physical health and well-being and an additional clause 7 to B incorporate construction and design methods and details which support health and well-being including energy efficiency, noise insulation, suicide prevention, and accessibility.
? Additional supporting text should be included highlighting how the form and character of places and buildings can have a significant impact on mental and physical health and well-being. High quality design, effective sound insulation, safe and inclusive design all contribute to good health. However, design should also seek to minimise social isolation, with effective use of public areas, and good lighting and measures to help prevent suicides and accidents.
? Access to and engagement with the natural environment is associated with numerous positive health outcomes, including improved physical and mental health, and reduced risk of cardiovascular disease, risk of mortality and other chronic conditions.

User: L&Q

Encouraging higher densities

The ability to deliver higher densities successfully rests with the local planning authorities and its Councillors. As per the above, the Mayor of London needs to be clear to local planning authorities and its Councillors that this is highly likely to result in a change in the physical character of some highly accessible town centres in the Outer Boroughs, which may not be received with a positive response. Building on points made above, Part B 1) of Policy D1, which requires Development Design to respond to local context and to the scale, identity and character of the locality, is written in a manner that could be used to supress increased density and scale

We therefore suggest that the actual wording of the policy should make it clear that opportunities to intensify the scale and density of development in high PTAL areas, in opportunity areas and in town centres should be actively encouraged, rather than relying on a general statement with no context, as set out in paragraph 3.1.1 which explains that ‘efficient use of land requires optimisation of density’.

User:	L&Q

Consistency across Plan

Policy D1 states that ‘development design should… aim for high sustainability standards’.

This statement should be removed as the relevant planning policy expectations are set out elsewhere across the Plan.

User:	L&Q

Utilising heritage assets

Policy D1 states that ‘respect, enhance and utilise the heritage assets and architectural features that make up the local character’.

The London Plan must define ‘utilise’. If the intended meaning is to make use of existing buildings where appropriate then this should be explicitly expressed.

User:	Highams Park Planning Group

POLICY CDP2: Character & Design:
Development shall be of high-quality design and should complement the existing character and appearance of the Area. In all development there shall be a presumption in favour of preserving the distinct character and appearance of the Area, as well as the views across it.

This shall be achieved by development:

i. Positively contributing to the character of existing buildings and taking into account the predominant local character and setting as described in the relevant Character Assessment for the area in which the development is located.
ii. Ensuring that mechanical plant such as air-source heat-pumps, being appropriately sited and screened so as to not be visually intrusive or to cause a noise nuisance.
iii. Having regard to the form, materials, scale, height, mass, orientation, pattern and grain of surrounding buildings, streets and spaces.
iv. Respecting the building lines and the predominant character of neighbouring properties.
v. Respecting Locally Significant Views as detailed in Appendix 4.
vi. Providing, where possible, public realm improvements.
vii. Contributing to the delivery of quality homes and streets that are attractive, functional and sustainable in accordance with the criteria set out in Building for Life 12.And:
viii. Innovation is welcome. However, proposals should clearly demonstrate how they will sit comfortably within the local context.

User: Socialist Health Association London

Policy D1 London's form and characteristics

AIR QUALITY

Air pollution: England’s chief medical officer calls for focus on health threat

Dame Sally Davies rightly says the issue is not just environmental and calls on UK government to bring in tougher standards to tackle toxic air

>> Management of construction sites is a vital part of air quality control. Where developers flout best practice in order to cut costs and local authorities turn a blind eye, the LA should be penalised – with so much construction work ongoing, this is a significant public health issue.

>> For instance the dust nuisance related to the demolition of Earl’s Court was significant - as predicted. When residents rightly complained, with the help of the local MP, measures were taken by Hammersmith and Fulham Council to ensure that the developers took steps to reduce the pollutants in situ. It did not entirely relieve the situation, but there were improvements.

Hammersmith & Fulham Council have facilitated a local Air Quality Commission which is chaired by a local resident https://www.lbhf.gov.uk/environment/pollution-and-air-quality/air-quality-commission

>> Westminster has very strict guidelines for developers operating in the borough, which ensure that construction/demolition nuisance is reduced as far as possible.

Good practice example : Westminster, Hammersmith & Fulham

Poor practice example : Lewisham Gateway

>> large mounds of stockpiles were kept in situ in a densely populated area for more than a year without any covering or reduction in size as recommended by the GLA Guidelines for construction site management. This caused enormous public health nuisance to the locality and resulted in some residents being forced to leave their homes.

All boroughs should be held to account to ensure that GLA Guidelines (which should be regularly updated with best practice) are implemented. Some LAs do so, but for those which do not, there should be penalties for those local authorities who flout the need for public safety and wellbeing in this regard.

Private households :

>> Unless in an emergency, where private householders are planning works, **it should be a requirement for them to notify neighbouring properties up to 200 yards away, at least one month beforehand.** This is not just in terms of planning permission but to warn residents in advance who may suffer from respiratory conditions for which such works can prove detrimental or dangerous and allow them time to make arrangements. **ALSO BASEMENTS***

Traffic

We applaud the current Mayor of London's endeavours and achievements in cleaning up our toxic air so far. We also **recommend that the Mayor of London follows the example of Paris and some other cities where diesel free days (obviously not as yet to incl public transport) and even car free days have been introduced.**

The location of schools close to areas of high traffic is a cause for concern – some councils are already **acting to reduce the exposure of pupils to traffic and other pollutants** and City Hall should share these examples and do everything possible to hold local authorities to account in the way the deal with this issue - or not.

We note that **Hammersmith & Fulham Council has brought in innovative electric car hire/share schemes** which should be on the City Hall website as examples of best practice - likewise for other projects of this calibre.

We recommend that that all black cabs are facilitated to change to an eco friendly fuel supply at the earliest opportunity - this is not just about new cabs. Conversion to electric is possible but quite expensive, but there are bio-friendly fuels which can be used instead.

A project to supply all black cabs with such a fuel should be central to London’s air clean-up.

Also with respect to black cabs (and mini cabs too) - the air inside a cab can be toxic. The trend for so-called 'air fresheners' which are sometimes used in multiples inside cabs is challenging for any passengers who have respiratory conditions and allergies. These items, which are usually manufactured abroad, are soaked in a range of untested chemicals - which include *formaldehyde, BHT, synthetic acetaldehyde - and embalmers glue* which when inhaled in turn can glue the heavily perfumed particulates to the lining of lungs.

These 'air fresheners' are not subject to safety checks, but installed by valet services who provide them for free, imported from abroad.

We would prefer that these toxic items are forbidden in hire vehicles – in particular black cabs. This should be a condition of registration.

We are concerned that the **impact of another Heathrow runway will dramatically overload West London with additional toxic particulates** - as well as added noise pollution, This is not the right site for additional runway capacity.

We are concerned that there are real inconsistencies between boroughs as to the safe management of construction sites. Some of these occupy large amounts of space and their impact on local air quality can be huge - and where they are badly managed causing additional ill health in the neighbourhood and even necessitating some to leave their homes - all of which is a public health issue.

Following the landfill tragedy in Spelthorne in 2014, **we trust that City Hall ensures that any landfill sites if such exist in London are subject to proper safety checks and maintenance** - particularly where flooding may potentially occur.

Green spaces in place of overcrowding :

>> Avoid giving permission to developments where the need for additional green space has not only been ignored but existing green space is also lost in the planning process!

eg. Lewisham Gateway

As outlined in the tall building sections : avoid tall building clusters which also block out light and access to essential levels of Vitamin D

eg. Lewisham Gateway, Distillery Tower Deptford.

Local authorities who flout good practice and damage public health should be penalised.

Smoking

Smoking is responsible for 50% of the difference in life expectancy between rich and poor and a major driver of inequality and poverty.

It is the major cause of reduced life expectancy in people with mental health problems.

It's also a key issue for sustainability of services – loss to councils can be calculated here:http://ash.org.uk/category/information-and-resources/local-resources/

>> London should promote smoke free spaces (playgrounds, touchlines, public spaces, around schools)

Enforcement is important too – there has been a big cut in trading standards since 2010 and we need to find ways to offset that.

Nationally, we should have a "Polluter pays" policy with a levy on tobacco industry profits to fund tobacco control etc.

User: Aberfeldy New Village LLP

Policy D1 (Design)

Policy D1 is overly conservative especially in the context of the acute housing shortage London faces and the Mayor's strategy to address this through intensification on previously developed land. With a bold new spatial strategy which seeks a doubling in housing completions there must be scope to allow high quality designs which redefine the local context while providing the uplift in housing and workspace the capital needs. This is particularly so in areas of average or poor environmental quality. While designs should have regard to the local context this should not mean that it must match existing styles and form to be acceptable, nor should it be possible for the policy to be interpreted in this way.

"B Development design should:

have regard *respond to local context* ***in the design of new developments*** *~~by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions.~~* ***~~Where appropriate development can also set its own context provided it is of a high-quality design."~~***

These changes ensure the policy is not overly conservative in its approach and better align it with the Mayor's strategy to realise a major step change in delivery of workspace and new homes. In some circumstances simply reflecting the local context will be inappropriate. For instance the Mayor's plans for significant intensification around transport nodes through the development of small sites will not be possible if new designs are required to be of similar form and design of the detached, demidetached or terraced homes they replace. The same would to areas in need of comprehensive redevelopment.

The changes above would ensure the policy is more effective in delivering the Mayor's spatial strategy by recognising that maintaining similarity with the surrounding context may in some cases be neither appropriate nor desirable.

User:	London and Continental Railways

Draft Policy D1 seeks to ensure that land is used efficiently by optimising density, connectivity and land use patterns, with the design of a development responding to its local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality. This is a positive approach to development and is supported, as neighbourhoods should be coherent and the development potential of available land parcels should be maximised where possible.

User: BA Pension Trustees, Nationwide Pension Fund Trustee & National Grid UK Pension

The consortium are satisfied that is possible intensify industrial capacity to allow release of land for housing following the processes set out in the Draft London Plan. However, to achieve this development at densities much higher than their surrounding context are required. It is against this context that we turn to the Design policies within the Draft London Plan.

The consortium support the Good Growth principle of making the most efficient use of land by optimising density, which is a thread that runs through the Draft London Plan. They welcome the recognition that good design plays a key role in making the most efficient use of land by optimising density. With regards to Policy D1 *London's form and characteristics* they broadly support the provision of this policy. However, they are concerned that as drafted Part B (1) emphasises local context as the main factor by which the scale of development is judged. The consortium consider local context to be an important factor in design development but it should not be the only factor. There are many good reasons why a development might appropriately be of a scale that is significantly larger than its local context without having a harmful impact. The need to use land efficiently and optimise density should also be a factor in determining scale and Part B should be modified to recognise this. It should also explicitly recognise that there are circumstances where development design should not respond to local context if making efficient use of land requires new development to initiate a step change in scale in low density, low townscape value areas.

User:	BA Pension Trustees, Nationwide Pension Fund Trustee & National Grid UK Pension

Appendix 3: Suggested modifications to design policies

Policy D1 London's form and characteristics

B Development design should:

1) respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions unless higher density forms of development are appropriate in locations of low townscape value.

User: Mr Gary Hayes

Policy D1 – London’s form and characteristics

We propose:

(i) Policy D1(B)1 contradicts policy set out elsewhere – including policy relating to Opportunity Areas. This section should also apply to Opportunity Areas ad large scale developments.

(ii) Policy D1(B)2 is, in part, about clear measurable standards and in part on subjective evaluations. We feel the policy should stick with clear measurable standards.

(iii) Issues such as designing out exposure to poor air quality, noise and crime, having good space standards and storage space, use of good quality construction materials, delivery of 150-year lifetime of buildings (at least), should be included in policy D1.

(iv) A matrix should be developed that facilitates assessment of adequate levels of green, play, youth and community infrastructure, affordable leisure facilities, local shops, services and amenities for any development - large of small. This should be based on delivering lifetime and walkable neighbourhoods.

User:	Airport Industrial Property Unit Trust

We also welcome the focus on design that maximises the efficient use of land, facilitates an inclusive environment, achieves safe and secure environments,helps to manage the impacts of noise and poor air quality, and delivers buildings and spaces that are positioned and of a scale, appearance and shape that rasponds successfully to the identity and character of the locality (Policy D1)

User:	Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living

D1 (98) - London's Form and Characteristics

There is likely to be considerable overlap with local design requirements and this is likely to result in duplication or contradictory guidance in some cases. Prescriptive policy such as this should be left to local planning authorities.

Objection: This policy is not positively prepared, and inconsistent with national planning policy as it is overly prescriptive for a strategic document. We respectfully request that it should be amended or removed.

User:	Age UK London - a charity working with older Londoners

POLICY D1: LONDON’S FORM AND CHARACTERISTICS.

PROPOSED POLICY AMENDMENTS:
ADD TO A: THE FORM AND LAYOUT OF A PLACE AND DEVELOPMENT DESIGN SHOULD BE AGE AND DISABLED FRIENDLY.

ADD NEW CRITERION C: COMMUNITY ENGAGEMENT SHALL BE UNDERTAKEN AT ALL STAGES OF THE PLANNING AND DESIGN PROCESS, WHICH SHOULD BE FOCUSED ON LOCAL PEOPLE, THEIR NEEDS AND ASPIRATIONS.

User:	Age UK London - a charity working with older Londoners

22. D1 (see notes 1 – 6 re GG1 above) LINK TO POLICY CHANGE It is considered that the addition of the amendment to Policy A and the insertion of new criterion C are critical for the appropriate transformation of London and coheres with the mayor’s intentions for London to serve the needs of Londoners as well as creating a vibrant city.

User:	Ashden (a charity)

Policy D1 main text: Remove equivocal language:

Policy D1 B 3) should read:
"~~*Aim for*~~ ***Have*** *high sustainability standards*."

The language and expectation is clear in regard to every other criterion except this one. If London is to achieve its zero carbon ambition by 2050, merely aiming for high sustainability standards will not be sufficient.

User: Ashden (a charity)

3.1.1. – 3.1.9 text: These paragraphs set out in some detail the different ways in which good design can help to achieve wider outcomes, such as reduced crime, exposure to poor air quality and improved access to active travel. The same is true of design and sustainability. With large numbers of homes and commercial developments expected in London, the simplest way of ensuring that they are low impact when built and when in use, is by designing in low energy use.

Ashden winners the PassivHaus Trust and the building standard they promote exemplifies this approach. Homes built to a Passiv standard can deliver zero emissions and guarantee the avoidance of overheating in summer and excessive energy demands in winter. A PassivHaus building often only costs a few per cent more in capital terms than a standard one and will be cost neutral in lifetime costs, whilst at the same time achieving its design targets for energy, ventilation and summer comfort.

This section of the London Plan should therefore reinforce the ways in which design can build in a commitment to London's zero carbon ambitions and, when approached ambitiously, guarantee energy performance when in use as well.

Omitting this is an oversight and contributes to the sense that sustainability is a technical issue that is relevant to only one aspect of the London Plan.

User: Mrs Alona Sheridan

The draft Plan gives insufficient consideration to the protection and enhancement of London's diverse local character. Policies D1 and and HC1 need to be amended to ensure that greater attention is given to the character map of London, and community or neighbourhood plans, in planning and designing new development. **Proposed changes:** The first sentence of Policy D1 'London's form and characteristics' should be amended to make specific reference to neighbourhood and community plans so that it reads **'Development Plans, area-based strategies, neighbourhood and community plans. and development proposals should address the following:'** The phrase **'reflect and enhance local character and distinctiveness'** should be added to the list after 1) in Policy D1A.

User: Mrs Alona Sheridan

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User: Blanche Cameron

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The first sentence of Policy HC1 'Heritage conservation and growth' should be revised so that it reads: '**Boroughs should, in consultation with Historic England, other relevant statutory organisations and local community and neighbourhood planning groups, develop evidence that demonstrates a clear understanding of London's historic environment, local character and distinctiveness.**'

User: Matthew Robinson

4. GREEN SPACE DEFINITION

D1.A.7

The phrase ‘green and open spaces needs to be more closely defined so as not to be misinterpreted. As it stands it is ambiguous and open to interpretation. We know of examples where an area of ‘open space’ consists of concreted paving stones with a tree in the middle of it. I suggest this policy should read:

Create, provide **and maintain** green and open spaces **as defined below for varied and multifunctional uses such as informal recreation,** social interaction, play, relaxation, physical activity, **food growing as well as areas reserved for cultural or environmental retention that may provide some limited recreation opportunities**

Suggested definition of ‘green spaces’ to include small areas of open space that are accessible to local residents, generally providing for recreation including passive recreation, children’s play and relaxation, which also can provide an identity and a sense of place for a community especially where it incorporates an important landscape feature or historic characteristic (Design Principle – Parks and Open Space: https://www.healthyplaces.org.au/userfiles/file/Parks%20and%20Open%20Space%20June09.pdf, http://www.greenspacescotland.org.uk/definition.aspx). They also include derelict, vacant and contaminated land which has the potential to be transformed
(http://www.greenspacescotland.org.uk/definition.aspx)
Suggested definition of ‘open spaces’ is any open piece of land that is undeveloped (has no buildings or other built structures) and is accessible to the public. Open space can include green space (land that is partly or completely covered with grass, trees, shrubs, or other vegetation). Green space includes parks, community gardens, and cemeteries. Open space also includes schoolgrounds, playgrounds, public seating areas, public plazas, vacant lots, allotments and growing sites. (EPA https://www3.epa.gov/region1/eco/uep/openspace.html)

I believe that food growing spaces are vital green spaces and should be brought into the definition. They contribute positively through productive food growing, bringing community together, providing employment, lessening pollution both locally and in terms of air miles, contributing to local economy, giving people skills and training for employment, lessening isolation, supporting mental health problems and the costs that go with them, reducing waste and using it productively, and making the community more self sufficient and less dependant on services.

I believe that this is essential to the London Plan's over-arching good growth principles (as amended by CFGN and Just Space): GG1 (Building strong and inclusive communities), GG2 (Making the best use of land), GG3 (Creating a healthy city), GG5 (Growing a good economy), GG6
(Increasing efficiency and resilience).

User: Matthew Robinson

5. CIRCULAR ECONOMIES

D1
Although the transitioning of London to a Circular Economy is heavily weighted in the narrative (3.1.11) there is no specific policy that relates to it.

I suggest an addition policy in D1 which says:
C. All developments must be built following the principles of a Circular Economy; by assessing design, making, selling, re-using and recycling what we use including air, water, waste including human waste, household and the food chain to determine how to get the maximum value from them, both in use and at the end of their life as shown in Figure 3.1.

A Circular economy will be only partial without a deep and penetrating connection to the food chain which can be and needs to be incorporated

I suggest the following points be incorporated into the narrative of D1:
To promote a circular economy London Plan must:

- **Help provide services to food producers in and around cities, including technical training and financial assistance (credit, technology, food safety, market access, etc.) to build a multigenerational and economically viable food system with inputs such as compost from food waste, grey water from post-consumer use, and energy from waste etc. while ensuring that these do not compete with human consumption. (MUFPP, 2015)**
- **Provide policy and programme support for municipal public markets including farmers markets, informal markets, retail and wholesale markets, restaurants, and other food distributors, recognizing different approaches by cities working with private and public components of market systems. (MUFPP, 2015)**
- **Improve and expand support for infrastructure related to market systems that link urban buyers to urban, peri-urban and rural sellers while also building social cohesion and trust, supporting cultural exchange and ensuring sustainable livelihood, especially for women and young entrepreneurs. (MUFPP, 2015)**

- **Acknowledge the informal sector’s contribution to urban food systems (in terms of food supply, job creation, promotion of local diets and environment management) and provide appropriate support and training in areas such as food safety, sustainable diets, waste prevention and management.(MUFPP, 2015)**

I believe that this is essential to the London Plan's over-arching good growth principles (as amended by CFGN and Just Space): GG1 (Building strong and inclusive communities), GG2 (Making the best use of land), GG3 (Creating a healthy city), GG5 (Growing a good economy), GG6 (Increasing efficiency and resilience).

User:	Mr Colin Bannon

3.1.5 Design out crime – useful to reference: interactive.securedbydesign.com

User: Notting Hill East Neighbourhood Forum

4. Policy D1

We would add

'make more beautiful' but specifically

a. make provision for storage spaces and places for bicycles

b. Consider designing out over time wider parking spaces to encourage smaller over larger vehicles to encourage more ecologically friendly vehicles.

c. All properties in London to display street number clearly visible and all streets to have visible names at each end.

User: London national Park City Foundation

Design: London’s form and characteristics - Policy D1, Pages 98 - 100

LNPCF PROPOSAL: LNPCF finds that Policy D1 and its supporting text is too general in overlooking the need for spaces and development to actively contribute to restoring high quality nature.

CURRENT TEXT:

B Development design should:…

3) aim for high sustainability standards

4) respect, enhance and utilise the heritage assets and architectural features that make up the local character

5) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water

6) achieve comfortable and inviting environments both inside and outside buildings.

3.1.4 Maximising urban greening and creating green open spaces provides attractive places for Londoners to relax and play, and helps make the city more resilient to the effects of climate change. Landscaping and urban greening should be designed to ecologically enhance and, where possible, physically connect, existing parks and open spaces.

LNPCF PROPOSAL: Policy D1 and supporting text must relate and gear urban greening and landscaping to precise needs to restore nature, increase public contact with nature, and access to open space for play, recreation and learning, and build resilience. Such needs can be informed by metrics such as data on nature deficits and public health data and information from the All London Green Grid and GIGL.

Communal play space for children and young people, Page 113

LNPCF supports the intention:

3.4.7 Communal play space for children and young people should be provided in developments with an estimated occupancy of ten children or more in accordance with the requirement of Policy S4 Play and informal recreation.

User:	Primrose Hill Conservation Area Advisory Committee

D1 A after 4) Our proposed revised text: ADD new ‘5) ‘preserve or enhance heritage assets’

D1 B 4) Draft policy: [Development design should] ‘respect, enhance and utilise the heritage assets and architectural features that make up the local character’

Our proposed amendments – reasoning: to ensure that the Plan is consistent with legislation and the NPPF.

Our proposed revised text: [Development design should] ‘respect, preserve and enhance and utilise the heritage assets and architectural features that make up the local character’

User: L&Q

Physical character

No relevant definition of ‘character’ is provided in the draft London Plan. Policy D1 states inter alia that: ‘B Development design should: 1) respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions’. As supporting paragraph 3.11 makes clear, the intended meaning here is ‘physical character’. However, Policy D2 when addressing plan-making states that this should be informed by an evaluation of ‘historical evolution and heritage assets (including an assessment of their significance and contribution to local character)’. Supporting paragraph 3.2.2 then implies character includes ‘social, cultural, physical and environmental influences’. It must be clear that Policy D1 does not address the ‘cultural, social, economic, perceptions and experience’ meanings of character. Good planning means that architectural and urban design responses should, whilst responding to heritage considerations, focus on the future for a locality and for Londoners. Good planning should not be directed by the cultural, social or economic characteristics of a place (or the perceptions and experience of it) at a particular moment in time.

As per the above, there is concern that the draft London Plan contains too much detail. However, if detail is provided then the content must undergo scrutiny. As such, all relevant instances to ‘character’ should explicitly define it as ’physical character’. The imperative to optimise development potential means there should be no ambiguity on this. This includes:

? Policy SD1 Opportunity Areas

? Policy SD6 Town Centres

? Policy SD8 Town centres: development principles and Development Plan Documents

? Policy D1 London’s form and characteristics

? Paragraph 3.6.9

? Paragraph 3.7.3

? Policy D8 Tall buildings

? Policy H2 Small sites

? Paragraph 7.1.6

? Glossary definition of Strategic Views and paragraph 7.3.1

User:	Mr Colin Bannon

There is reference to other policy documents and guidance but there is also opportunity to add more in some sections. For example,

3.1.5 Design out crime – useful to reference: interactive.securedbydesign.com

User: Ms barbara weiss

1. D1 A (7) ....that are appropriately sized to reflect population densities. New developments must not be allowed if there are not sufficient or adequately sized open green areas in the immediate vicinity.
2. D1A (11) **The form and layout of a place must be based on the understanding of the heritage of the area, including its historic grain and archaeological interest**
3. D1 B (1) building and spaces that are of a scale, **HEIGHT**, appearance....and **CONSERVES EXISTING HISTORIC ENVIRONMENT**
4. D1B (2) use of attractive, robust, **DURABLE** materials, which weather and mature well and are appropriate for the character of the locality.
5. 3.1.2 **To deliver a public realm that is high quality, and appropriate to the character of a particular area, more generous floor-to-ceiling heights at ground floor level must be encouraged if to be found in neighbouring typologies.**
6. 3.1.4 Green open spaces must be provided that are adequate and appropriate to the density of local population. Conversely, the size and density of all new developments must be determined following careful consideration of the overall provision of a local green areas.

User: Home Builders Federation

Paragraph 3.1.7.

We are unconvinced that it will be straightforward to integrate employment and residential activities in the Town Centres. This will become harder to achieve with the adoption of the Agent for Change principles in the draft London Plan. It is unlikely that deliveries outside of peak times – i.e. night time – will be conducive to residential areas.

Paragraph 3.1.10

We would question whether the circular economy principles sit well with the aim of the draft London Plan to intensify the use of previously developed land. Circular economy principles could be used by LPAs to justify refurbishment rather than intensification of areas of low density development.

Policy D1: London's Form and characteristics

The policy is unsound in places because it is unjustified.

Generally the HBF is supportive of the principles of design and urban design articulated in the policy.

Part B 1) is unsound because it requires design to correspond to the "scale" the "form" and "proportions" of the locality. This would come into conflict with the aims of the draft London Plan to exceed prevailing densities (for example the deletion of the density matrix from the draft London Plan and the aim to densify suburbia through H2) in the attempt to accommodate the housing need.

We consider that Part B 1) should be re-drafted to read:

"B Development design should:

1. *Respond to local context by delivering buildings and spaces that are positioned and of the appearance that is in keeping with the identity and character of the locality. The local planning authorities in determining applications should not refuse applications solely on the grounds that the density and height of the buildings proposed is out of keeping with the local context."*

Part B 3) is unsound because it is unclear what is being asked for. The policy requires development to “aim for high sustainability standards”. This is vague. It is unclear what is ‘high’ and what would satisfy an ‘aim’. It is hard to know how an applicant or decision-maker would respond to this. Sustainability standards for construction are defined in other parts of the draft London Plan (eg. D4 and D5, SI2).

This part is superfluous and should be deleted.

User: Regent's Park Conservation Areas Advisory Committees

Chapter 3 Design
General: We welcome the references made to the requirement for ‘high quality development’ at **D1 B 2);** and respecting and enhancing local character and heritage assets at **D1 B 4)**, and delivering ‘good design’ at **D2**.
Our proposed amendments – general reasoning: We seek to ensure that policy is consistent and effective, especially in terms of good design in relation to heritage assets, including Conservation Areas. In Conservation Areas local policies and guidance have been drawn up in collaboration with local communities. They seek to achieve Plan objectives in defining and safeguarding local character and appearance, buildings and spaces which are much-valued by local communities, and which are key elements in defining the sense of place which is so important to communities, to local cohesiveness, and to local economic success, including tourism.
D1 A after 4) Our proposed revised text: ADD new ‘5) ‘preserve or enhance heritage assets’
D1 B 4) Draft policy: [Development design should] ‘respect, enhance and utilise the heritage assets and architectural features that make up the local character’
Our proposed amendments – reasoning: to ensure that the Plan is consistent with legislation and the NPPF.

Our proposed revised text: [Development design should] ‘respect, preserve and enhance and utilise the heritage assets and architectural features that make up the local character’

Policy D2 Delivering good design

User:	HTA Design LLP

On Design Scrutiny (Policy D2G), we would recommend that a line is included to encourage boroughs to also ensure consistency in design reviewers if a scheme is reviewed more than once.

User: London Borough of Bexley

Policy D2 Delivering good design represents a departure from previous London Plan approaches to design. The draft Plan appears to return significant control to the boroughs, which will be expected to establish the most appropriate form of development for a given area based on an evaluation, and this is welcomed, although the process set out represents a significant piece of work for local authorities. Limited resources will be a key issue in this regard with delays in establishing design principles potentially leading to a significant reduction in control over small developments as proposed in the presumption in favour measure set out in **H2(D)**.

The supporting text (in particular **Paragraphs 3.2.2** and **3.2.3**) simply reiterates that an evaluation should be carried out, and it would be useful if guidance could be provided on the following issues:

? suggested methodologies and example evaluations;

? discussion of what is meant by an area;

? explanation of each of the 11 elements and how they relate to determining an area's development capacity or appropriate form of development; and

? the types of documents that will set out the appropriate form of development.

it is also recommended that infrastructure provision be added as one of the elements considered as part of the evaluation. Infrastructure availability is one of the key determiners of development capacity in a given area, under an approach of sustainable development. The relationship between development capacity and infrastructure provision is encapsulated in the approach to Good Growth in particular in **Policy GG1** that emphasises access to good quality services and amenities that accommodate, encourage and strengthen communities.

Practical assistance may help in undertaking evaluations. However, it is imperative that the Mayor's Design Advocates do not look to blindly impose solutions from central and inner London on a suburban context. Statistical information, including socio-economic data, housing type and tenure, and air quality and noise levels, should be packaged by the GLA and provided directly to the boroughs.

There is significant concern that a density matrix has not been included in the draft new London Plan. The Council considers that this is a big mistake. Although there are some issues with its operation, it does provide at least a starting point for discussion with developers. The real risk will be that in the absence of such a guide much time will be lost managing developer expectations on site capacities with a resulting delay in delivery. This will significantly increase the importance of establishing parameters at the local level in terms of scale, height, density, layout, and land uses to secure the right kinds of development in the right places, with good reference to the existing character and context. However, for this approach to be effective, it is essential that the appropriate forms of development set out by local planning authorities have a strong policy basis as the local manifestations of **Policy D2**, and are backed up in planning decisions and in appeals.

When the GLA considers strategic planning applications, either at Stage I/II review or when it acts as the local planning authority, its recommendations/decisions should have regard to the appropriate form of development and the relevant design parameters. Importantly, the GLA should consider the implementation of **Policy D2** in the interim period between adoption of the new London Plan and the undertaking of an evaluation and setting out appropriate forms of development by the London boroughs. In the absence of a document setting out appropriate forms of development, a site-by-site analysis should be carried out, with design expected to meet the policy requirements set out in the draft Plan.

Whilst the establishment of design parameters is supported, whether the draft London Plan implicitly assumes a clear and direct relationship between the capacity for growth and the appropriate form of development is questioned. **Part B** of **Policy D2** is subtitled: **Determining capacity for growth**; however, the policy text does not refer at all to development capacity figures, but instead to the form that the development should take. The policy or justifying text should clarify whether the evaluation and subsequent documents should set out development capacity, or should focus only on appropriate forms of development. They are distinct.

User: Future Cities Catapult

2.2. Policy D2 - Delivering good design, Part C (Design analysis and visualisation) states that:

“Where appropriate, visual, environmental and movement modelling/assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform and engage Londoners in the planning process.”

2.3. We recommend this to be reworded to:

“Where appropriate, visual, social, environmental and movement modelling/assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models and the data that informs them, particularly 3D virtual reality and other interactive digital models, should, where possible, be openly accessible so that they can be used to inform a city-wide understanding of developments, and better engage Londoners in the planning process.”

2.4. This change will ensure that this policy is future proofed so that the growing number of new tools and methods for assessing development are encouraged and none are excluded.

User:	Future Cities Catapult

2.5. Policy D2 - Delivering good design, Part G (Design Scrutiny) - The design quality of high density developments and masterplans needs to be robustly backed by strong evidence and data to allow officers to fully understand their impact. Given the absence of a Density Matrix and the emphasis on design, we strongly recommend a new point under ‘Design Scrutiny’ setting out:

“The design quality of proposed developments needs to be robustly assessed and quantified by the use of new digital tools, data and evidence.”

User:	HTA Design LLP

Whilst we believe retaining the architect throughout can be a desirable mode of procurement, ensuring commitment from the developer in delivering the consented scheme is far more important, and for this the consented scheme must be realistic, deliverable and viable. It is hard to see how boroughs would be able to enforce retention of the architect through legal agreements.

User: Just Space

D2 Delivering good design

This policy should be strengthened to enforce the requirement for social impact analysis (SIA) to be undertaken and published before major developments are designated or designed. Further elaboration of this proposal are in the Just Space Community-led Plan for London additional chapter on the subject.[1]

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

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

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

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

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

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

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

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

User: Mr Liam Kelly

Part A: To identify an area's capacity for growth and understand how to deliver it in a way which strengthens what is valued in a place: This growth needs to be sustainable and inclusive of existing communities. The policy needs to acknowledge the legal framework for inclusion and participation embracing the 'Sedley' principles to ensure effective and inclusive community participation. All policies require relevant social impact assessments and strategic environmental assessments.

Part B: Determining capacity for growth

LP Policies 3.2.2 & 3.2.3 (pp104-5) to be included in this shaded box section

As the London Plan is for 25yrs unknown potential factors like the outcomes Brexit, more regional development in other parts of UK and a potential crash in London's overheated housing market, the possibility of a decrease in the population of London should be included in growth appraisals.

Part D: Design quality and development certainty

An obligatory quality framework that provides a system of checks and balances should be established for each development and implemented and monitored throughout the scheme. Independent experts and specialists should be appointed to evaluate the framework and inspect/monitor from start to finish to ensure that quality is being enforced. When completed the development needs an effective management policy as defined within the framework.

User: Kingston University

Policy D2: Design

Policy D2 seeks to deliver good design. This is supported by the University which always seeks to ensure its new developments are high quality and enhance their settings to makes places more supportive of all aspects of people‘s lives, including employment and relaxation. We wonder if the policy is currently too prescriptive with respect to external design review and whether it might be more appropriate for Councils to develop local procedures for external design panels?

User: London Borough of Ealing

This policy on the design process is supported and provides a welcome emphasis on the information and evaluation process which underpins the development management process.

However, we are concerned about the independent design review process and how this will work in practice. We note that Mayor plans to issue guidance in due course. At Ealing Council we operate a robust enhanced service for large developments including a significant emphasis on pre-application work and pre-submission consultation. We also have surgeries with key stakeholders such as schools and housing regeneration. A key focus is design quality. We will also often meet with GLA officers on referable schemes at an early stage to ensure early engagement and consistency of approach.

The addition of other channels poses the risk of further delay, additional cost and duplication of effort and therefore any mandatory requirements need to be both appropriate and proportional. In a period of constrained funding for LPAs policy should be designed to bring design expertise into planning departments, as is encouraged by the GLA funded Public Practice initiative, rather than farm it out. We would welcome an opportunity to be consulted on any guidance before it is adopted.

User: Ealing Matters

This catch-all policy establishes the Plan's new approach as being that of 'design led planning'. It sounds impressive but a close reading of it shows it to be a policy that offers no measurable criteria in relation to specific development proposals. Almost certainly it will prove impossible to enforce. When applications are assessed it will certainly carry less weight than polices like HI and H2.

And if this policy fails in what it purports to be aiming to do, many other of the Plan's key policies, particularly those that are supposed to regulate housing density will prove equally toothless. So, however alluring it may sound there is a very serious danger that this policy alone will unleash a new wave of speculative development proposals that will prove impossible to regulate.

The risks of basing the overall Plan on an immeasurable aspiration such as this is particularly high at the present time when budget cuts have caused many boroughs - certainly the London Borough of Ealing - to run down the capacity of their planning departments - particularly where they concern design skills - to the point that they are almost non-existent. The lack of expertise in the Borough is likely to make implementation of this policy simply impossible.

User: Redington Frognal Neighbourhood Forum

D2 A A second paragraph is to be added to D2 A:

“London’s neighbourhood forums can assist with this process, through plan preparation, holding design charrettes, and through discussions on individual sites and locations. Such involvement in what constitutes ‘Good Growth’ at specific sites is important to the delivery of the London Plan.”

D2 6) This should explicitly note that sunlight levels on green space are to be maintained, in order not to harm the value of the green spaces and the following rewording is suggested.

D2 6) open space networks, green infrastructure, and water bodies. “Sunlight levels should be assessed to provide a reference point and to ensure that sunlight levels are not reduced.”

D2 D Design codes for conservation areas should ensure that the character and distinctiveness of the conservation area is preserved and enhanced. A suggested second sentence is provided below.

D2 D: new second sentence. “Design codes for conservation areas should be drawn up by heritage specialists, collaborating with neighbourhood groups, and ensure that the character and distinctiveness of the conservation areasand other heritage assets are preserved and enhanced.“

D2 F and G Design scrutiny (page 103). Design reviews should be undertaken transparently with input from residents affected by the development, using and opinion to be informed by the use of a community design charrette process. It is suggested that the following amendments are made.

D2 G 1) “design reviews are carried out transparently by independent experts and local experts, with opinion to be informed by a community design charrette process.”

Paragraph 3.2.7 The following extra sentence is to be inserted at the end of the paragraph.

“Wider involvement of local residents and community groups in design review is encouraged, to harness local knowledge and improve engagement between local communities and those making decisions on development in London.”

User: Tamara Burnell

As a resident of one of the estates already earmarked for “regeneration” against the residents’ wishes, I was horrified when I saw that the Draft New London Plan now includes even more aggressive regeneration targets for individual boroughs.

The estate where I live (Benhill Estate, Sutton Central) is a wonderful local community based around mid-rise (6 storey builds) flats and maisonettes built c. 1970, with a children’s and elderly residents’ garden in the centre. Importantly the existing estate is mostly home to families, who require 3 bed flats (if they have children of both genders or elderly parents to look after). It is fairly high density (I believe 330 families in one small square) but the estate is well designed, and although there are some repairs required to keep the flats in good condition, the estate is very well looked after and residents love their homes. The residents are deeply opposed to the plans to regenerate the estate which were announced last year, when the previous London Plan required Sutton to submit plans to redevelop existing estates and build higher rise blocks in much closer density/without green space, in order to accommodate twice the number of families. However, the previous plan discussed with residents included a promise that families that needed a 3 bed flat (either leaseholders or council tenants) would be able to get a replacement 3 bed flat if those previous regeneration proposals were to go ahead.

Now we see that the New plan requires Sutton to build almost 3 times as many new homes, primarily in one-bed flats. This completely fails to meet the needs of existing residents, most of whom are families. The borough has a very high number of families with young children, who already struggle to find accommodation. Forcing these families out of the borough (though who knows where they could go – Bolton?) will be hugely disruptive to their children's education. If all regeneration is to take the form of 1 bed flats, it will mean a very different demographic using local facilities (which in itself is problematic, as putting adult shops and nightclubs/bars right next to schools/health centres already creates quite a bit of tension), and nowhere for local families to entertain children and socialise. Child related services and shops are already a significant local employer, so if families with children are forced to leave the area because there is nowhere for them to live, local employment would suffer. Forcing high rise blocks into areas that were not designed to accommodate them is also problematic - a number of high rise blocks of flats have recently been erected in Sutton town centre and have created a terrible wind tunnel effect, due to poor planning – there are parts of the high street area that are now not safe on foot with children because of the high winds. Please don't make this worse. Finally, I assume that the plans to build only 1 bed flats would make Sutton a cheap dormitory town for single workers commuting into central London to do minimum wage jobs – however, Sutton's transport network is already completely failing to cope with the existing commuter burden (one or two Thameslink trains per hour, almost always half cancelled and always bursting and unsafe with the high number of passengers trying to cram themselves in), so more single people needing to commute into London would completely overwhelm the train services. You can't just increase housing density without considering the knock on impact on local services. Already most local services are squeezed beyond bursting point, so where would all these new residents find healthcare etc.??

The residents of the Benhill estate have raised their concerns with Sutton Council, but it appears that there is nothing the local council can do by itself, and so we are asking you, as London Mayor's office, to reconsider the housing targets for Sutton, and in particular the emphasis on 1 bed flats to meet those targets for numbers of new homes. Those of us with children need 3 bed homes, and that is not an unreasonable requirement.

User:	Association of Local Government Archaeological Officers (ALGAO)

Support part A7 for ‘evaluation’ for Development Plans to cover historical evolution and heritage assets – again this should include archaeological assets and would normally involve a review and if necessary update of a borough’s Archaeological Priority Areas.

User: Chartered Institute of Architectural Technologists

Delivering Quality and affordable Homes

Policy GG4

This policy underpins the targets with which Londoners will measure the success or failure of this plan, irrespective of the wider and strategic elements such as transport and infrastructure. In order to deliver more homes, the promotion of brownfield land is essential (policy H1.B.2) as is the strategic release of previously industrialised land and the promotion of smaller sites, but these are not the only solutions. New innovative means of creating homes, especially affordable homes need to be promoted, but not at all costs and we are pleased to see that the draft plan has re-enforced quality as part of the core of this plan (policy D2 – Delivering good design).

We must however raise some concern regarding the use of specific wording in the plan, a specific example can be found in policy D2.H.4, namely “local planning authorities using architect retention clauses in legal agreements…”. The use of the word “architect’ is restricted and there are numerous competent design professionals, such as Chartered Architectural Technologists, who can and do carry out this design role. It is also essential that when engaging designers the ability to design holistically, understanding the technical performance of traditional buildings (i.e. those that were originally constructed under different regulations) is essential to ensure preservation of the fabric and to retrofit appropriately.

In addition, we applaud the reinforcement of mandatory inclusive design. This will help to create more inclusive communities

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In addition, we applaud the reinforcement of mandatory inclusive design. This will help to create more inclusive communities

Policies D1, D2 & D3

We are in agreement with the proposals contained in the plan.

User: Notting Hill Housing Trust

NHHT welcomes Policy D2 Delivering good design and supports the process of Design Reviews, as identified in parts F and G, to assess and inform pre-application design options. Having engaged in design review processes across a number of boroughs, NHHT is concerned about the criteria upon which design is scrutinised and also those who are selected to sit on Design Review Panels.

NHHT is committed to driving out high quality design, but often has to consider the impact of high specification and expensive/impractical design features in light of our desire to deliver the maximum amount of affordable housing. NHHT also are driven to ensure that planning designs do not create affordability burdens for our residents.

It is our experience that Design Review panels consists of architects (and on occasion landscape architects/sustainability consultants) who often do not appreciate nor consider the impact of high specification, impractical and often complex design on the resident's enjoyment of their home, the resident's ability to afford their home and the impact of expensive design on scheme viability. NHHT is of the view that good design does not have to be expensive; however we often receive comments in design reviews that are in opposition to this. These challenges are unique to the RP sector and therefore not necessarily typical of the challenges many architects are used to when designing or critiquing private ledled schemes.

NHHT is committed to delivering high quality affordable homes and would impress upon the Mayor the need for Local Planning Authorities to include a Champion for Affordability either on Design Review Panels or at some part in the Design Review process.

NHHT would also ask the Mayor to consider providing greater clarity or specific guidance on the requirement to identify key construction details in planning applications. NHHT agrees that construction materials should be identified in order to ensure that quality can be maintained, however we would assert that the current drafting of the policy could lead to LPAs to requesting construction specification details. Like many developers, NHHT's preferred construction procurement contract is a Design and Build, by which we are able to control the quality of the build whilst ensuring most value for money. If we are required to provide material specification, this can impede upon our ability to negotiate best value for money in the delivery of affordable homes in London.

Where we can NHHT will look to retaining architects for as long as possible in the delivery of our homes. We would however ask for the Mayor to reconsider part H4, where the policy encourages LPAs to use architectural retention clauses in legal agreements. As beneficiaries of public funds, NHHT must comply with the 2015 Public Contracts Regulations. The appointment of any consultant or designer is governed by these regulations and as we have to demonstrate most value for money throughout all procurement exercises. The requirement under part H4 would make it very difficult for NHHT and other RPs to comply with procurement regulation and we would ask that this is removed from the policy.

User: British Property Federation

The real estate industry strives for excellence in the design and delivery of new development and we welcome the acknowledgment that design should be considered in line with ensuring the most efficient use of (limited) land, in order to optimise the use of development sites. To this end we would encourage the Mayor to strengthen plan policies around optimising density and the appropriateness of tall buildings in suitable locations, as an incentive for applicants to innovate in design terms in order to deliver higher density.

We would also encourage the Mayor to consider including clearer and more specific design policies within the plan. By providing clearer guidance on design and best practice in this regard, those tasked with delivering development project will be armed with the right tools to build at optimised densities.

Checks and balances within the public policy and decision-making spheres play a crucial role in ensuring quality of product and best practice in design. With regard to Policy D2 F, design reviews to date have not always been an ideal embodiment of this aspiration. In order to provide a productive and consistent tool for regulating design quality, design review must be consistent across local authorities. This has not always been the case to date, and we would encourage the Mayor to reconsider or strengthen policy to this effect. Applications at all scales of development are subject to review by local authority planning and (where in-post) urban design officers, reflected by continued evolution, review and scheme re-design by professional architects and relevant experts within the associated project teams. Design is therefore a key consideration from the outset of any development proposal. Design work is often carried out extensively before pre-application discussions with a local authority and therefore the timely (i.e. early) use of design review mechanisms is important in relation to ensuring a productive planning process. Some of the professionals that sit on the respective panels have previously highlighted the inconsistency of design review mechanisms and have urged that planning officers should be more proactive in requiring such reviews to be undertaken at an earlier stage. Delaying the first design review can be obstructive to design evolution and delay next steps in the planning process. We would therefore encourage the Mayor to reassess the timing of implementation of these reviews, to improve their effectiveness and reconsider the associated design policies to be stronger, which will help guide a consistent design review process.

We would welcome further consideration of Policy D2 H 4) which encourages local authorities to implement architect retention clauses in legal agreements ‘where appropriate’. We believe that it is indeed important to promote the highest standards of design and to ensure that these are upheld beyond the planning stage and into project delivery. We do however believe that retention clauses may result in some unintended consequences and we would encourage different mechanisms to be used in aid of upholding design standards, whilst allowing the flexibility for developers to consider commercial viability and to work with their preferred architects in the construction phase. This would be the preferred approach, as there are a number of unknowns and harmful consequences that such a restriction could lead to/ have. An example would be where a developer purchases a development site with planning permission and an associated s106 retention clause is in place. The purchaser would not be able to build out and deliver this using their own trusted architect - tried and tested working relationships often produce positive results – without seeking to renegotiate the s106 with the local planning authority. Inevitably, this could delay implementation. We would therefore request that further thought is given to the mechanism by which local authorities ensure that design quality is upheld; the most appropriate means is via well-crafted planning conditions referring to drawings and plans for the submitted design, and other documents submitted as part of the application.

User:	Business for London
“Design-led”. The plan advocates a ‘design-led’ approach to determine the scale, density and form of development. While design is a relevant consideration, the Plan should be clear that these design reviews should not override key land use, including workspace, policies and should not be overly cumbersome or delay develop,ent.	

User: Town and Country Planning Association

Policy D2 Delivering good design

3.6.1 The TCPA supports this policy which takes a ‘life course’ (from site evaluation to maintenance) approach to integrating good design into the planning and development process. ‘Achieving good design’ is one of the few planning duties on LPAs in the Planning and Compulsory Purchase Act 2004 as amended, so this duty should be clearly referenced in the supporting text to emphasise its importance.

3.6.2 Policy D2 (D) should also make references to wider policies on housing standards and healthy streets to inform the masterplan and any design codes/ guides adopted. The supporting text should set out the Mayor’s minimum design expectations to provide LPAs and applicants certainty, which will also assist with consistent monitoring of good design in developments.

3.6.3 Further supporting text should make explicit reference to requirement for London Boroughs to set out monitoring indicators against this policy as part of the Authority Monitoring Report (AMR). This will allow the Mayor and GLA to have an effective oversight of design quality delivered and secured across developments which it currently does not have. As part of the TCPA initiative – the Raynsford Review of Planning[1], it has undertaken a comprehensive review of all local planning authority AMRs including all London Boroughs, the City of London, LLDC and ODPC since 2012[i]. Overall while 77% have monitored the quality of housing delivered over this period, there is a wide variety and inconsistent set of benchmarks used ranging from Building for Life to Lifetime Homes, and most importantly, monitoring has significantly reduced to only a handful of Boroughs in the most recent AMRs.

3.6.4 In summary the TCPA supports Policy D2 with a recommendation to strengthen both the policy and supporting text as outlined.

[1] TCPA Raynsford Review of Planning https://www.tcpa.org.uk/raynsford-review

References

[i] See Raynsford Review of Planning. Research outputs can be made available as requested. www.tcpa.org.uk/raynsford-review

User: Uttlesford District Council

Furthermore, the SHLAA explains that estimates of development potential are based upon use of the density matrix in the adopted London Plan, with estimates based on the top of the density range for town centres and higher assumptions applied in opportunity areas reflecting recent trends. This represents a disconnect with the draft London Plan, which no longer includes a density matrix and instead, at Policy GG2 (Making the Best Use of Land), requires a design-led approach to be taken when exploring the potential of land, understanding the character of different places. This is further expanded upon in Policy D1 (London's Form and Characteristics), Policy D2 (Delivering Good Design), and Policy D6 (Optimising Housing Density). In particular, these require a design-led approach that 'optimises' development potential. To optimise development density is a fundamentally different concept to maximising development density, reflecting what is right and appropriate for an area. It is considered inconsistent that the draft London Plan relies on evidence that is based upon an approach that is not reflective of its own policies. Rather, the estimates of potential in the SHLAA should be based upon a design-led approach as required by Policies D2 and D6. This is emphasised by evidence to the draft London Plan[1] which suggests that use of the density matrix 'may result in inappropriate development in certain places'[2].

[1] GLA Density Paper 4, Exploring Character and Development Density

[2] ibid. Section 2.5

User:	Hammersmith and Fulham Historic Buildings Group

D2E
Design and Access Statements should, as standard, include a sections covering the impact the proposals would have on both listed and unlisted heritage assets in the vicinity and not just adjacent to the site.

User:	Hammersmith and Fulham Historic Buildings Group

D2G
It is important that Design Review panels (where employed) should include representatives from local amenity groups who really know the area and not solely practicing professionals ie Architects.

User: London Wildlife Trust

We welcome and support this policy in principle. However, under Part A there needs to be explicit reference to the ecological and biodiversity context; this should follow from the NPPF requirement (para 117) for Local [Development] Plans to map ecological networks.

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

6) ecological and open space networks, green infrastructure, and water bodies

User:	S Place

Chapter 3. Design

Elsewhere in this dmft plan there is great emphasis placed upon green roofs [this after existing gardens have been built on]. For a building to have a green roof7roof garden it has to be flat. Therefore, the Mayor is proposing one style of building across the board, which will be cuboid in shape but with varying heights. This is not good design and will not enhance any ancient viiJage or Metroland Town.

User:	S Place

The lack of provision for quality amenity/ play space is disturbing. Green roofs/gardens are not suitable for children's use. Children need a safe play space that can be seen from the parental home. The loss of the facility for people to have private, good quality outside space leads to many cases of poor mental health . This plan does not take this problem into consideration, in fact it will exacerbate the problem .

User:	Canal & River Trust
The Trust welcomes the proposal that waterbodies should be considered in the initial evaluation of an area’s capacity for growth.	

User: London Environment Directors' Network (LEDNet)

Policy D2 Delivering good design

Part A needs to reference waste and recycling needs, and ecological context (in line with the National Planning Policy Framework (NPPF) requirement for planning policies to identify and map local ecological networks (paragraph 117)).

A

6) open space networks, green infrastructure**, biodiversity**, and water bodies

12) current and future waste and recycling infrastructure requirements

User: Crest Nicholson PLC

We consider this Policy to be unsound as currently drafted and amendments are required.

Crest Nicholson are concerned that the effect of many of the proposals in Policy D2 will slow down the decision-making process in London and interfere with certainty of delivery of much needed housing which will undermine the Draft London Plan's housing policies and general targets.

We agree that good design is important to ensure successful places, however by widening the scope of schemes referable to the Mayor and the extent of the design scrutiny they will be subject to there is a significant risk that planning applications will take substantially longer to agree and will involve greater expense.

Policy D2 Part C

Crest Nicholson considers that the requirement to provide visual, environmental and movement modelling will be time-consuming, unnecessary and costly, particularly some forms of 3D virtual reality and interactive digital modelling. We believe it should be left to the applicant to demonstrate, through whatever means that it thinks appropriate, the benefits and acceptability of its proposed development. As such where visual, environmental and movement modelling/assessments would aid the applicant it may choose to use such modelling/assessment. We are concerned that there is a risk, even in the current, somewhat caveated form of the policy, that it may be mis-applied by Boroughs and imposed through Development Control and Local Plans as applying on a more blanket basis. This policy and its potential implications particularly poses a risk to small and medium sized developers given the cost of such modelling/assessment and so it risks undermining the Government's support for this sector of developers.

Policy D2 Part D

Whilst Crest Nicholson accept that there will be some schemes where the use of design codes would be appropriate, we do not consider that design codes should be applied to all development schemes as the draft policy requires. Design codes are appropriate where there will be multiple phases comprising different buildings and the applicant, Borough and the Mayor wish to ensure consistency as regards quality and style of design. Design codes would not be appropriate in relation to detailed planning applications where design would be considered and approved as part of the original determination of the application. Where an outline application is submitted for a single building or for a development that will comprise a single phase a suitably worded condition tying the design that will be the subject of reserved matters applications to design and access statement information would be appropriate. We would suggest that the policy be amended as follows:

“D Masterplans should be used to help bring forward development and ensure it delivers high quality design and place-making based on the characteristics set out in Policy D1 London’s form and characteristics.

“New E For proposed developments that are the subject of outline planning applications and which will be comprised of multiple phases design codes should be used to ensure it delivers high quality design and place-making based on the characteristics set out in Policy D1 London’s form and characteristics.”

Policy D2 Parts F and G

Crest Nicholson have an issue with the concept of the design review panel. Councils and their internal design officers alongside the project design team should have a sufficient level of competency to assess schemes based on policy guidance within the London Plan and general architectural merit.

The requirement should only be necessary on schemes of strategic importance. Whilst comments from design review panels can prove helpful in some circumstances it is considered that the process can also add undue delays and costs to the planning application process. This is particularly inappropriate for many uncontroversial and policy compliant schemes which should be encouraged to navigate themselves through the system in a cost and time efficient manner. The concern is that the process will be a further contributor to inhibiting delays in the delivery of housing across London. Part F should be amended accordingly

Part F is also unsound in requiring Design Review “early in the planning process”. Local planning authorities cannot compel applicants to enter into pre-application discussions (NPPF, paragraph 189). These are voluntary arrangements. The Mayor cannot insist on pre-application engagement through the draft London Plan.

Policy D2 Part H(3) and Explanatory Text 3.2.9

Crest Nicholson have significant concerns regarding the impact of Part H3 and the narrative at explanatory text paragraph 3.2.9. What is being proposed seeks to adjust what is laid down in statute and statutory instrument as regards the application of conditions and importantly the relationship between outline consents with reserved matters approval as compared with detailed consents.

Part H(3) and explanatory text seek to require submission of design details for large elements of development at outline stage. This is not legally necessary save in relation to outline applications involving conservation areas and listed buildings. To require the level of detail sought would undermine the Government's intention to speed up the planning process which has been seeking, through changes to law and national policy, to introduce fewer requirements at outline stage.

If Local Authorities attempt to 'fix' the design of large proportions of development too early in the planning process this (i) could potentially slow down development coming forward given the extra requirement to work up detailed drawings which would usually not be required until reserved matters stage; (ii) will prejudice smaller developers as it places a higher cost burden at the outset of a development; (iii) will not account for changing building regulations, materials availability and other changes that might affect design that may be introduced over the lifetime of the construction phase of a development which would ordinarily be capable of being accommodated via reserved matters application designs – changes made prior to commencement of a reserved matter area should not be considered detrimental to design as they can enhance the end design and building; (iv) will impede large multi-phase developments where extensive drawings and details will be required to be fixed at outline stage and which will also not enable such developments to adapt as referenced in point (iii) above; (v) fails to take into account the application of design and access statements and design codes that can readily address the concerns that appear to be the driver behind this sub-policy wording .

Giving the applicant-developer the certainty of an outline planning consent provides the security to finance the detailed design work to take place, expecting high level design work before the certainty of the principle of development has been approved will be overly onerous for the reasons outlined above.

Policy D2 Part H(4) and Explanatory Text 3.2.10

Local authorities should not be allowed the opportunity to force the work of particular architects onto developers- this is essentially what the London Plan is seeking to achieve in Part H(4). This could have a huge impact on developer's ability to negotiate fees and utilise members of their own procured and vetted supply chain and would ultimately create an anti-competitive environment that may also result in poor design quality. Assuming the driver behind this sub-policy is to ensure the quality of design and delivery, the retaining architects would not be the most effective way of ensuring this happens. It is possible that the architects initially employed at outline stage may not be best suited to the project for example detailed design drawings may require different expertise than masterplanning and general layouts- this may especially be the case where a developer purchases a site with outline (or detailed) consent that has been secured for example by a landowner where the architect is not best suited. In addition, architects will move practices, retire or otherwise leave the profession and may not have sufficient capacity to undertake work which again is not accommodated by the proposals. Whilst we accept that planning conditions or obligations could be drafted that would enable substitution of architects with approval from the relevant local authority, we consider this would be a further unnecessary delay on bringing forward development when the local authority will have other more appropriate means of securing high quality design.

Instead, the responsibility of the local authority should be to enforce their consented proposals, consider use of design codes that should be prepared before commencement and monitor the construction documentation through the discharge of conditions.

User: B.H. Pankhurst

1. D2 Delivering good design

I live in the London Borough of Ealing who know nothing about “good design” in practice. The only considering is cost and profit margin.

The habitations (for want of a better word) which are being constructed are not sustainable (water, energy etc). , not conductive to family life and have little or no green open space in the immediate area.

Measurable criteria in relation to good design needs to be part of the plan to address the needs due to climate change.

User: 313-349 Ilderton Road LLP

Policy D2 Delivering good design sets the processes and actions to help ensure development delivers good design. It includes reference to guidance on design reviews, including how panels and processes should be managed.

The wholesale avocation of the use of Design Review Panels must be initiated with some caution as this can prejudice development delivery through delay and/ or increased costs. Further, the process can obfuscate decision-making, particularly where the Design Review input is generated late on in the planning process.

It is suggested that an alternative is to emphasise the use of clearly stated and updated Design Guidance (through SPG) at a strategic level which is then referenced at a local level. This has the dual benefit of providing clarity for decision-makers and consistency for developers.

User:	Catalyst Housing Limited

Draft Policy D2 relates to delivering good design and, amongst other things, makes provisions for maintaining design quality. Criterion H (3) (and the supporting text) refers to avoiding deferring the assessment of the design quality of large elements of a development to the consideration of a planning condition or referred matter. This is inconsistent with national policy and legislation and needs to be amended to address this, consistent with the legislative provisions of outline planning applications. There are other mechanisms to control design quality, for example through design codes, with the ultimate safeguard being through the reserved matters approval process.

User: Benhill Residents

We have concerns about how ‘good’ design may be determined and who determines this. As expressed in response to D1 this should be about clear measurable standards.

Re: Initial evaluation.

(A) Add – ‘Detailed discussion with local existing and immediately neighbouring residential and small business communities should be carried out in relation to any proposed ‘growth’ area should also be carried out. This should relate to their key concern and assessed needs.’

Re: Determining capacity for growth

(D) Master planning and any design codes should be informed through careful engagement with local communities, measurable standards and social impact assessments.

Re: Design Scrutiny

(F) Design reviews must involve representatives of the local community, who must be informed by wider community views – e.g. through being mandated through networks of community and voluntary sector groups.
In addition, a full and detailed description of what ‘good design’ must be developed to support this policy, if monitoring of any achievement or otherwise, is to be assessed.

User:	The Royal Society for the Protection of Birds (RSPB)

Section A of this policy describes the process boroughs should take to identify an area's capacity for growth. This is welcome, however, the policy as drafted **fails to mention** the **likely impact on existing legally protected wildlife sites, the SINCs network and wider ecological corridors**. This should be an essential part of an area's evaluation of growth capacity and must be built into the adopted policy. Part A of the draft policy should be amended in this regard.

User: Elaine Chambers

Policy D2 Delivering good design

We have concerns about how ‘good’ design may be determined and who determines this. As expressed in response to D1 this should be about clear measurable standards.

Re: Initial evaluation.

(A) Add – ‘Detailed discussion with local existing and immediately neighbouring residential and small business communities should be carried out in relation to any proposed ‘growth’ area should also be carried out. This should relate to their key concern and assessed needs.’

Re: Determining capacity for growth

(B) Initial evaluations should also include a social impact assessment of any proposals to ensure sustainable growth and specific benefit to existing communities is achieved.

Re: Design quality and development certainty

(D) Master planning and any design codes should be informed through careful engagement with local communities, measurable standards and social impact assessments.

Re: Design Scrutiny

(F) Design reviews must involve representatives of the local community, who must be informed by wider community views – e.g. through being mandated through networks of community and voluntary sector groups.

In addition, a full and detailed description of what ‘good design’ must be developed to support this policy, if monitoring of any achievement or otherwise, is to be assessed.

User: Silvertown Homes

Under Part A 3) of this policy LPAs are encouraged to undertake a borough wider assessment of appropriate building heights and densities for an area, which will then be used to identify the growth capacity of an area and be cited for planning applications. This broad-brushed approach is inconsistent with the discretionary planning system that operates in England and which requires each application to be considered on its own merits.

The approach suggested could lead to policies and guidance artificially constraining the full development potential of sites. The true test of development capacity should be properly tested at the planning application stage.

User: Silvertown Homes

The draft London Plan does not provide guidance on the circumstances when schemes should go before Design Review Panels.

The draft London Plan presumes that design review will always be a positive process. However, development proposals emerge from extensive work by the applicant's team and interaction with the local planning authority, Greater London Authority (where referable) and other stakeholders.

By comparison, design reviews will typically spend only hours appraising a scheme. Panellists may not be as well informed as they might about the relevant opportunities and constraints. Experience indicates that the views of panels can be afforded too much weight. Moreover, the panel's view will not always be correct. All planning consultants will have worked on schemes where both Planning Officers and the applicant have firmly disagreed with a panel.

The draft London Plan should be redrafted to provide clarity on the circumstances when schemes should go before Design Review Panels. There is a risk otherwise that schemes encounter unnecessary delay and additional cost through disproportionate use of the Design Review process. Local Boroughs are well-equipped to exercise discretion on this point. It is essential that Part G of Policy D2 revisits the statement ‘schemes show how they have considered and addressed the design review recommendations’ to read: ‘schemes show how they have considered the design review recommendations and where an applicant disagrees with advice provided they should provide justification for their own response’.

The supporting text to Policy D2 should emphasise that design review is a process of critically appraising a scheme and the design justification for it. It should make clear that the purpose of the design review process is to help better outcomes emerge but that it is not intended to dictate the design of a scheme.

User: Silvertown Homes

The policy seeks inter alia:

‘3) avoiding deferring the assessment of the design quality of large elements of a development to the consideration of a planning condition or referred matter

4) local planning authorities using architect retention clauses in legal agreements where appropriate’

Point 3 should be removed. The London Plan should recognise that such an approach will not be appropriate for phased developments and outline planning permissions. This can be adequately addressed via Reserved Matters and planning conditions.

Point 4 should be removed. This creates a ransom situation for a developer as an architect is not competing in the open market for work. There are equally no grounds to believe that standards will be higher, given an architect will be under no particular pressure to perform to the very highest of their abilities. More detailed design matters should continue to undergo assessment by decision-makers.

User: Royal London

D2 – Delivering Good Design

Whilst RL recognise the benefits of Design Review Panels in the planning process there is significant concern regarding the approach of the policy (D2 E,F,G) in its current wording. A recurring issue with the planning process that presents risk and often development proposals coming forward is the time and uncertainly of the planning process. We would therefore make the following comments to be reflected in a revised wording for this policy.

- The independence of the DRP process needs to be a key principle and process of oversight introduced to provide confidence to all stakeholders including applicants and residents. In many instances DRP processes are utilised or managed at a local level to focus on specific views of Council officers rather than provide a truly independent assessment.
- Whilst the potential benefit of DRP process for referable applications are understood the introduction of an absolute requirement for this is not supported given the current limited DRP resourcing/availability which would mean such a requirement is not deliverable. In its current wording, this would result in a situation where often proposals are delayed or not brought forward due to delay in the planning process or subject to disadvantage in their assessment (when proceeding without a DRP review) due to no fault of the applicant.
- Further definition on thresholds for DRP at local levels should apply and the same concerns as identified above in relation to resourcing and a blanket requirement apply. The wording of the policy needs to be amended to introduce a responsibility on the Council to provide the DRP process in a set timescale and that this should only be required for this most signification schemes.
- Threshold should clearly be for most significant schemes given additional financial cost of this process at risk.

User: Silvertown Homes

Part C of this policy states that ‘where appropriate, visual, environmental and movement modelling/assessments should be undertaken to analyse potential design options for an area, site or development proposal’. Situations where this will be ‘appropriate’ are not defined.

If this approach forms is advocated by the Plan it is essential that it applies to only larger strategic schemes and that the draft London Plan provides explicit guidance on a suitable threshold. Otherwise producing such models may involve considerable and disproportionate expense for applicants. This could be a further barrier to the delivery of development, particularly for smaller sites.

User: Earls Court Public Sector Tenants' Assoc

We have concerns about how ‘good’ design may be determined and who determines this. As expressed in response to D1 this should be about clear measurable standards.

Re: Initial evaluation.

A. Add – ‘Detailed discussion with local existing and immediately neighbouring residential and small business communities should be carried out in relation to any proposed ‘growth’ area should also be carried out. This should relate to their key concern and assessed needs.’

Re: Determining capacity for growth

B. Initial evaluations should also include a social impact assessment of any proposals to ensure sustainable growth and specific benefit to existing communities is achieved.

Re: Design quality and development certainty

D. Master planning and any design codes should be informed through careful engagement with local communities, measurable standards and social impact assessments.

Re: Design Scrutiny

F. Design reviews must involve representatives of the local community, who must be informed by wider community views – e.g. through being mandated through networks of community and voluntary sector groups.

In addition, a full and detailed description of what ‘good design’ must be developed to support this policy, if monitoring of any achievement or otherwise, is to be assessed.

User: Historic England

Historic England supports this policy, with a minor change, for clarity.

We particularly welcome:

- Part A stating that an area's capacity for growth should be identified and delivered in a way that strengthens what is valued about a place, including evaluation of

3) urban form, structure, townscape, grain, heights ...

7) historical evolution and heritage assets, including assessment of their significance and contribution to local character …

Historic England supports the use of 3-D modelling and welcomes part C advocating the use of this developing technology. We strongly support para 3.2.4 referring to the use of digital modelling in the plan-making process, as this will promote a plan-led approach. We suggest this is included in part C as a minor change, to reflect this positive opportunity.

We recommend the following changes:

- In part C, amend to read: 'These models, particularly in 3-D virtual reality and other interactive digital models should, where possible, be used to **inform plan-making and decision-taking, and to** engage Londoners in the planning process'

User:	Historic England

Historic England supports this policy, with a minor change, for clarity.

The important role of borough conservation officers in assessing schemes should be recognised in part F, and the supporting text.

We recommend the following changes:

- In part F, amend to read '…in addition to the borough's planning, urban design **and conservation** officers' assessment …'
- In para 3.2.7 supporting text, amend to read: '…review by qualified urban design **and conservation** officers as well as formal design review'.

User:	Living Streets

We strong support the requirement for boroughs to evaluate transport networks, including walking and cycling networks, in preparing Development Plans and Area Based Strategies.

User: Orbit

Supporting draft paragraph 3.2.9 seems to suggest that the Mayor will seek to limit the use of non-material and material amendment applications to planning permissions. Whilst Orbit recognises the importance of maintaining the design quality of a permitted scheme, it can be necessary following further detailed design work at the post planning stage for amendments to be required.

It should be at the discretion of the local planning authority to determine whether an amendment application is acceptable, and if the cumulative impact of various amendment applications will lessen the scheme's design quality. It is not the role of the London Plan, as a strategic document, to limit the use of minor amendment applications.

In relation to draft paragraph 3.2.10, the potential use of architecture retention clauses as part of planning conditions is not supported by Orbit. The control of detailed design remains with local planning authorities and does not require the inclusion of an architect retention condition to ensure high-quality design is maintained.

Whilst Orbit agrees that often it is desirable to keep consistent architectural input throughout a process such an approach unnecessarily restricts the selection of architects and suggests improvements to the design of schemes cannot be made by the appointment of subsequent architects.

User:	Historic England

We note part F 2) refers to a height of 30m as a potential definition of tall buildings where boroughs have not adopted a local definition. Please see our comments in relation to policy D8. It is likely that boroughs will need to consider what is tall in a number of different contexts in their areas.

User:	Historic England

We support the statement in para 3.2.9 requiring assessment of design elements, such as landscaping and building facades, to be part of assessing the whole development and not deferred for consideration after planning permission has been granted.

User:	London Property Alliance
This is more appropriately addressed at a local level. Procedural matters such as the use of design review panels in the determination of applications should be left to individual planning authorities	

User: HB Reavis UK Limited

HB Reavis supports and promotes good design and considers that it is an important factor in creating high quality new workplaces. However, we are concerned that policy D2 (in particular Part F which provides that boroughs and applicants should use design review to assess and inform design options early in the planning process, and that design review should be in addition to the borough's planning and urban design officers' assessment and pre-application advice) is difficult to achieve when not all boroughs have a design review function. We also consider that the suggestion within Part H fo local planning authorities to use architect retention clauses in legal agreements where appropriate is too onerous. Architect retention clauses should only be used in exceptional circumstances when only one particular architect can deliver the design that has been secured, and even then they must always be flexible enough to avoid prejudicing commercial discussions.

User: London Property Alliance

The Alliance does not consider it appropriate for the Plan to set out within policy the procedural steps that Boroughs should follow in giving pre-application advice and determining applications, or indeed on the content of planning applications. Policy D2(F) & (G) should be amended to remove the references to design review early in the planning process. It is for the Boroughs to set out their preferred processes for pre-application engagement, depending upon their resourcing, skills and local engagement. There is concern that over-reliance on design review will exasperate the problem that many boroughs lack the skills, resource and experience to deliver design reviews.

The Alliance recognises that design review panels are successfully used in some parts of London and suggest that their use elsewhere is more appropriately encouraged within the supporting text to Policy D2, rather than required by the policy itself. Design review may be best focused upon establishing key principles for sites, rather than risk becoming bogged down in lengthy discussions over matters of detail.

Without prejudice to this recommended change, the criteria for establishing where design review is necessary should be reconsidered. As drafted, Policy D2 would require design review where buildings are over 30m, when there is no prevailing local definition of tall building. This should be removed. This is because neither the Cities of London or Westminster have a local definition of tall buildings. This means that, if this policy was applied as drafted, a significant number of proposals for larger (and often non-residential) developments over 30m within both Cities, that would not normally be considered or perceived as “tall buildings” would, nevertheless, fall into this definition of tall buildings and so require design review. The Alliance does not consider this to be appropriate or necessary.

The Alliance suggests the following amendment to Policy D2(F)(2):

“[if they] propose a building defined as a tall building by the borough (…), or that is referable to the Mayor on grounds of height and is significantly taller than the surrounding area where there is no local tall building definition ~~or that is more than 30m in height~~.”

Whilst the Alliance welcomes the aims of policy D2H to maintain design quality through from planning to the completed scheme, we do not consider it appropriate for the Plan to include, at Policy D2(H)(4), the retention of architects secured by legal agreement. This may go beyond the scope of s106 of the 1990 Act and CIL Regulation 122.

The wording of the policy is stronger than Paragraph 3.2.10, which refers to securing ongoing involvement (as architect or design reviewer) via a condition, which is a power that Boroughs already have. We consider that Policy D2(H)(4) should be removed.

User:	PAFH - Physical Activity for Health (London Sport)

We strongly support these – and other – policies which take into account health and wellbeing, active travel and air quality in identifying areas of growth. These issues all impact on how active people are, as well as the quality of the environment within which they are active, all of which carries considerable implications for population-level health and wellbeing

User:	Camden Town Conservation Area Advisory Committee
D2 A7 We welcome this clause	

User: Camden Town Conservation Area Advisory Committee

D2 D Design Codes General 1: we are concerned by the reference to Design Codes and
their effectiveness. There must be concern that the NPPF's statement (36) that design codes should 'avoid overly prescriptive detail' may make them an inadequate mechanism for managing density (D6) in complex and sensitive heritage areas. See also policy H2 B 2.

General 2: We are also very concerned over who prepares Design Codes. They need to be undertaken transparently in collaboration with local communities in order to be consistent with the Mayor's objectives.

Our proposed amendments – reasoning: To achieve effective policy implementation, and consistency with the Mayor's objective of working collaboratively with local communities.

Our proposed revised text: to ADD 'Design Codes should be prepared by Boroughs transparently and in collaboration with local communities, respecting local
distinctiveness, and preserving and enhancing heritage assets.'

User: Camden Town Conservation Area Advisory Committee

D2 G 4 Draft policy: ‘design review recommendations are appropriately recorded and communicated to officers and decision makers’

Our proposed amendments – reasoning: to ensure consistency with the requirement for transparency at D2 G 1. Our experience is that, while design review is welcome, it is too lacking in transparency, and not open to scrutiny. Our amendment seeks to address both the means of better achieving high quality design, and the need to build trust in democracy.

Our proposed revised text: ‘design review recommendations are appropriately recorded and communicated to officers and decision makers, and made public for scrutiny in good time before officers’ recommendations are prepared.’

User: Barratt Developments plc

Under Part A 3) of this policy LPAs are encouraged to undertake a borough wider assessment of appropriate building heights and densities for an area, which will then be used to identify the growth capacity of an area and be cited for planning applications. This broad-brushed approach is inconsistent with the discretionary planning system that operates in England and which requires each application to be considered on its own merits.

The approach suggested could lead to policies and guidance artificially constraining the full development potential of sites. The true test of development capacity should be properly tested at the planning application stage.

We suggest that paragraph 3.2.3 acknowledges that any broad assessments undertaken by LPAs are indicative and that the design of schemes should be ‘design-led’ (as set out in Policy D6).

Development should not be artificially constrained by onerous height or density restrictions where a clear design rationale can be demonstrated.

User: Barratt Developments plc

The draft London Plan does not provide guidance on the circumstances when schemes should go before Design Review Panels.The draft London Plan presumes that design review will always be a positive process. However, development proposals emerge from extensive work by the applicant's team and interaction with the local planning authority, Greater London Authority (where referable) and other stakeholders.

By comparison, design reviews will typically spend only hours appraising a scheme. Panellists may not be as well informed as they might about the relevant opportunities and constraints. Experience indicates that the views of panels can be afforded too much weight. Moreover, the panel's view will not always be correct. All planning consultants will have worked on schemes where both Planning Officers and the applicant have firmly disagreed with a panel.

The draft London Plan should be redrafted to provide clarity on the circumstances when schemes should go before Design Review Panels. There is a risk otherwise that schemes encounter unnecessary delay and additional cost through disproportionate use of the Design Review process. Local Boroughs are wellequipped to exercise discretion on this point.

It is essential that Part G of Policy D2 revisits the statement 'schemes show how they have considered and addressed the design review recommendations' to read: 'schemes show how they have considered the design review recommendations and where an applicant disagrees with advice provided they should provide justification for their own response'.

The supporting text to Policy D2 should emphasise that design review is a process of critically appraising a scheme and the design justification for it. It should make clear that the purpose of the design review process is to help better outcomes emerge but that it is not intended to dictate the design of a scheme.

User: Barratt Developments plc

The policy seeks inter alia:
‘3) avoiding deferring the assessment of the design quality of large elements of a development to the consideration of a planning condition or referred matter
4) local planning authorities using architect retention clauses in legal agreements where appropriate’

Point 3 should be removed. The London Plan should recognise that such an approach will not be appropriate for phased developments and outline planning permissions. This can be adequately addressed via Reserved Matters and planning conditions.

Point 4 should be clarified so it is clear there are circumstances where the retention of an architect would not be appropriate. For example, some architects specialise more in the planning and less in the construction phases of projects.

The alternative approach would create a ransom situation for a developer as an architect is not competing in the open market for work. There are equally no grounds to believe that standards will be higher, given an architect will be under no particular pressure to perform to the very highest of their abilities. More detailed design matters should continue to undergo assessment by decision-makers.

User:	Barratt Developments plc
Part C of this policy states that ‘where appropriate, visual, environmental and movement modelling/assessments should be undertaken to analyse potential design options for an area, site or development proposal’. Situations where this will be ‘appropriate’ are not defined. If this approach forms is advocated by the Plan it is essential that it applies to only larger strategic schemes and that the draft London Plan provides explicit guidance on a suitable threshold. Otherwise producing such models may involve considerable and disproportionate expense for applicants. This could be a further barrier to the delivery of development.	

User: Vital OKR

Policy D2 regarding delivering good design, and associated paragraphs, are unacceptable as they provide guidance (some of it with the potential to be good) that would properly apply to the process of preparing Local Plans, documents that have a required process that enshrines some consultation and maintains some fairness, yet here they are presented in relation to murkier processes. Many of the suggestions here need to be relocated to a policy that describes the Mayor's expectations for the preparation of Local Plans and associated planning frameworks, with particular emphasis on achieving fairness, and how the Mayor will support. This surely is appropriate for the London Plan. The reference to design review as a form of scrutiny, and mention of transparency in relation to a shockingly un?transparent add?in to the opaque pre?application processes is offensive. It really is troubling that the London Plan has so much to say about this niche part of the sew?it?all?up?before?consulting procedures that have become routine in planning and development, yet close to nothing to say about how the planning system as a whole should be operated to improve fairness, comply with requirements of the law, be more accessible, address democratic deficits, open up to dialogue, and reduce violations of people's rights.

I would like to say more on this (particularly as my former job was Head of Design for London, at the GLA) but I have run out of time heading towards the consultation deadline. I urge that Policy D2 and its relationship with all those small moments in the draft plan that refer to consultation and fairness (and so on) in the planning system, should be a topic at the Enquiry in Public, and I would like to give fuller evidence on this matter.

User:	London Borough of Sutton

SUPPORT WITH CONDITIONS. The London Borough of Sutton welcomes the objective of D2H which seeks to ensure the design quality of development is retained through to completion. The council is particularly concerned to ensure design quality is maintained in schemes where exceptional design has been a key factor in approving development schemes.

However, the council considers that Policy D2 should pay greater regard to local character and townscape in determining capacity for growth.The council is supportive of sustainable growth but considers that new development should successfully integrate within the townscape, particularly when considering small sites.

User: Old Oak Park Limited

We wholeheartedly support the ambition of this policy, but consider that some elements are overly prescriptive. In particular:

- Part H which stipulates how boroughs should attach conditions, and suggesting that design quality should not be deferred to reserved matters (although the Draft Plan uses the term ‘referred’ matter, we presume it means reserved). We object to the request to provide construction details at planning stage when this will be prior to the involvement of a contractor, and therefore unreasonable to request. Scale and external appearance are matters capable of being reserved, and this will remain a statutory right for any applicant – especially on large and complex masterplan developments which may be designed and delivered over a long time period. In these situations, design codes provide part of the solution, but it would remain within the scope of an outline permission to reserve much of the design to the reserved matters stage;
- The indication that boroughs should use architect retention clauses in legal agreements ‘where appropriate’ and the subsequent supporting text at paragraph 3.2.10 goes beyond what should be considered appropriate for this strategic document, and is unduly onerous. Such requirements can present unnecessary contractual difficulties for developers, and should only be required where a specific architectural practice has been used to gain planning permission for development that goes beyond the bounds of what may otherwise have been granted using an architect of lesser quality; and
- Paragraph 3.2.9 provides guidance to boroughs on the use of conditions to avoid ‘value engineering’ through future amendments. Minor amendments that are not referable to the GLA should not be considered in the Draft London Plan, and amendments post planning permission to make a scheme more deliverable are a natural part of the design process – especially where there is greater pressure on the financial viability process and greater cost and time involved in securing planning permission in the first place. Preventing or overly constraining this process will have a detrimental impact on delivery.

RECOMMENDATION: We request the following amendments to this policy:

- Amend Part H to remove the requirement for construction details at planning stage, and to refer only to architect retention clauses in exceptional circumstances, not as a matter of course; and
- Amend paragraph 3.2.9 to reduce the scope of intervention into minor amendment applications and changes once planning permission has been granted.

User: Argent (Property Development) Services LLP

Draft Policy D2: Delivering good design

There is no justification for including sub-sections ‘Design Scrutiny’ and ‘Maintaining design’ within a strategic planning document and, in our view, they should be removed. Whilst Argent is a strong advocate of good design, the decision on whether a scheme undergoes design review and the nature of that review should be agreed between the Borough and applicant at the pre-application stage having regard to the specific circumstances of the scheme. Likewise, the contents of a planning submission and what elements of a scheme are to be conditioned is a matter for discussion between the boroughs and applicants, having regard to published ‘Planning Application Requirements’ documents which all boroughs produce and Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended). Attempting to include too much detail within the planning application (some of which may not be available at that stage) will significantly slow down the planning determination process and undermine the delivery of development.

Clarification is also sought on the role of the Mayor’s Design Advocates which are referred to in paragraph 3.2.6. It is unclear how they will interact with planning application proposals, particularly given that boroughs commonly seek their own independent advice on the design through design review panels or similar.

User: PRP

The supporting text of policy D2 correctly recognises the importance of maintaining design quality throughout the development process from planning to completion. It is also right for the Mayor to recognise the consequence of changes to a project following the grant of planning consent.

It is suggested in paragraph 3.2.9 that an assessment of the design of large elements of a development, such as landscaping or building façades, should be undertaken as part of assessing the whole development and not deferred for consideration after planning permission has been granted.

The Plan should recognise that it the landscape element of developments which often bears the brunt of budgetary cutbacks during the on-site stage of a building project (either with or without the client's agreement) and any strengthening of oversight in this matter of quality would be welcomed.

User: One Housing Group

Draft policy D2: ‘Delivering good design’

There is no justification for including sub-sections ‘Design Scrutiny’ and ‘Maintaining design’ within a strategic planning document and they should be removed. Whilst OHG are strong advocates of good design, the decision on whether a scheme undergoes design review and the nature of that review should be agreed between the borough and applicant at pre-application stage having regard to the specific circumstances of the scheme. Likewise, the contents of a planning submission and what elements of a scheme are to be conditioned is a matter for discussion between the borough and applicants, having regard to published ‘Planning Application Requirements’ documents, which all boroughs produce, and Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended). Attempting to include too much detail at planning application stage (some of which may not be available at that stage) will significantly slow down the planning determination process and undermine the delivery of development.

User:	Persimmon Homes

We share the HBF’s concerns that based on experience, the substantial increase in use of Design Panels will increase the time taken during the pre and planning application process. Furthermore, this will add to the regulatory and cost burden for developers. We consider it should be for the individual London Local Authorities to set out their approach to the use of external design panels having regard to their circumstances, including their internal design resource.

User: Persimmon Homes

The policy is unsound in places because it is unjustified and because it sometimes because it conflicts with national policy.

Persimmon are concerned that Policies D2 and D3 will give rise to delays in the determination of applications and slow rates of delivery. Furthermore, it adds additional levels of complexity and costs to the process.
In general, this draft Policy is too prescriptive. It is not clear why many of these elements are in a spatial planning document let alone embodied in policy.

In terms of part D, Masterplans and Design Codes are useful tools where necessary. This policy implies that they should be use, irrespective as to whether they are necessary. A full application with a single phase of development would not require a Design Code for instance.

Part F - In view of the need to boost delivery, we consider that the blanket requirement for a Design Review is not necessary. This should be assessed by individual boroughs as part of the pre-application process based on the circumstances of the case and their published guidance.

Part H 4) - We agree with the HBF that the Mayor cannot insist that local planning authorities use architect retention clauses in legal agreements as this is anticompetitive and impinges on the ability of developers to appoint alternative parties should they choose or need to.

User: Durkan

As outlined above, the draft London Plan no longer includes a density matrix; however Policies D1 (London's form and characteristics) and D2 (Delivering good design) incorporate a number of prescriptive design requirements and obligations which have the potential to slow up the planning application process and introduce further costs to developers. These policy changes do not necessarily lend themselves to encouraging 'Good Growth' or increasing the rate at which development comes forward, particularly development of new homes.

The requirement within Policy D2 to provide clarity regarding the quality of design within the wording of the planning permissions, and associated conditions and legal agreement reduces the flexibility, at a later stage, to amend a consented scheme and the ability to further optimise extant permissions and use of the land. This would appear contrary to the Mayor's 'Good Growth' model and creates overly restrictive conditions and obligations attached to a development scheme. The planning system has to date successfully relied upon details of design to be reserved under condition or at a later design stage in the case of outline applications and there does not appear to be a strong justification and objective analysis that the current method has a detrimental impact upon design quality currently seen in London.

Instead it is considered that increased funding for LPA's, who are often under-resourced and do not have the staff with the relevant design skills to guide a development through the design stages, could help address any concerns over design quality.

It is considered that the use of condition is an appropriate way to secure design detail. Therefore Policy D2 H parts 2 and 3 should be removed.

User: Durkan

Furthermore, Policy D2 proposes the use of architect retention clauses in legal agreements, which is again considered to be overly restrictive and not always feasible due to cost and resourcing. It does not appear reasonable for a local planning authority to insist on a particular architect to be retained throughout the entirety of the development design process, especially if the planning permission is appropriately conditioned and controlled. Furthermore, it should be recognised that the development of a design concept often requires a different set of skills to the build out of a scheme, which at times necessitates the appointment of different architects.

The use of architect retention clauses should be removed from Policy D2 H part 4.

User:	Durkan

Policy D2 requires additional design analysis to be provided to support proposals, such as 3D Virtual Reality models, which will not only further delay the planning process but will result in frontloading of costs early on in the planning process. These requirements are likely to impose additional financial burden and ultimately impact upon the viability of a development scheme. This will limit growth as developers are likely to be discouraged by these associated delays and costs.
Therefore it is considered that the requirement for further technical documents under Policy D2 should be removed.

User:	Blackheath Society

Policy D2 Delivering good design: Here too, whilst we agree with the thrust of this policy, ‘optimised’ should not be read as synonymous with ‘maximised’

User: Barnet Society

Policy D2 – Delivering good design

We welcome the Mayor's advocacy of high quality design, and of design review to assess and inform design options early in the planning process.

In D2F, however, please clarify which types and sizes of development should be reviewed, and whether it would apply to both publicly and privately promoted projects, as it would be impracticable to review every development.

User:	Barnet Society

Para 3.2.5

It would be helpful if the ‘exemplary design standards’ could be defined, or links provided to authoritative sources

User:	Barnet Society

Para 3.2.7

This refers to the Mayor's guidance on design reviews, but we have been unable to locate that guidance, so a reference would be useful. Its relationship (if any) with Design Council CABE's *Design review – principles and practice* https://www.designcouncil.org.uk/what-we-do/built-environment/design-review should be clarified.

User: Clarion Housing Group

Clause D2-B

"*The outcome of this process must ensure the most efficient use of land is made so that development on all sites is optimised."*

The proposed factors the Plan lists to consider when determining an area's capacity for growth are comprehensive and appropriate and the reference to other policies is good. However the use of 'optimise' in assessing how land is used needs clarification. E.g. Policy H12 refers to optimising the housing potential of sites, and Policy D6-A that residential developments that do not optimise density should be refused. An assessment of non-residential neighbourhood amenities and the surrounding context is required to influence what is considered an optimal solution for an individual site.

Clause D2-B Replace with: ***development is optimised across sites in a borough to reflect the needs of housing, employment, education and recreation.***

User: Kesslers Stratford Limited

Draft policy D2 subtopics ‘Design Scrutiny’ and ‘Maintaining design quality’ are not appropriate in a strategic planning document and should be removed. The decision on whether a scheme undergoes design review and the nature of that review should be agreed between the borough and applicant at pre-application stage having regard to the specific circumstances of the scheme. Likewise, the contents of a planning submission and what elements of a scheme are to be conditioned is a matter for discussion between the boroughs and applicants, having regard to published ‘Planning Application Requirements’ documents which all boroughs produce and Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended). Attempting to include too much detail at planning application stage (some of which may not be available at that stage) will significantly slow down the planning determination process and undermine the delivery of development.

User:	Clarion Housing Group

H 4) *“local planning authorities using architect retention clauses in legal agreements where appropriate.”*

While this may be best practice it is not common practice due to the specialisms of different architects. Those normally employed in the earlier stages of design tend to be appointed for their skills in master planning and concept design. Whereas at the point of construction, architects with more site experience in producing working drawings are used.

Para 3.2.10 describes that consideration should be given to alternative ways of securing the design team’s ongoing involvement in a scheme.

Clause D2–H 4) **Add:** ***and where this will not hamper the detailed design process.***

User: Dagenham Dock Limited

Draft Policy D2 – Delivering good design

Whilst DDL is supportive of the Mayor's aspirations to improve the quality of design on consented schemes across London, Draft Policy D2d and Policy D2f should be worded in a way which facilitates the submission of both detailed and outline planning application submissions. DDL acknowledge that Masterplans and Design Codes are extremely helpful in securing high quality design and place-making principles, however it is important that the variance between the level of detail submitted for outline and full planning applications is acknowledged. Whilst Draft Policy D2 is positive in its aspiration, onerous design review panels and supplementary material should be managed so not to prevent the progression of outline schemes.

As currently drafted Draft Policy D2 does not clearly clarify how the Design Review process should be managed in boroughs where a Panel has not yet been established; or where boroughs do not have the skills, resource or experience to facilitate such a forum. In these cases, it is not currently clear whether the Mayor would intervene and assume overall responsibility. Further, there will undoubtedly be situations whereby the Design Review Panel and the Local Planning Authority are unable reach an agreement on key principles / elements of the design. Draft Policy D2 does not currently advise on how this scenario would be overcome, and which view will be considered to carry more material weight in the planning application process. In addition, it is crucial that the requirement to enter into the Design Review process does not unduly prolong the planning process and delivery of key, strategic site. Accordingly, DDL seeks further clarification from the Mayor on this pre-application requirement and the clauses within Draft Policy D2.

User: Footwork Architects Limited

Principle 1
Social needs must be identified and addressed as a prerequisite to development

Description:

Whether creating a new neighbourhood, or regenerating an existing one, to transform the built environment alone will not provide for social needs. There must be a thorough understanding of social context and existing problems, then specific steps identified to address them. Until these social factors are tackled, built environment professionals cannot create the physical conditions to help a community thrive. It is essential to avoid repeating the mistakes of the past and to learn from what has worked, through developing and implementing mechanisms for the measurement of success.

Assessment:
Methodology is already in place to assess local social needs:

- *Index for Multiple Deprivation* (the generally accepted measure)
- *Joint Strategic Needs Assessment* and *Joint Health and Wellbeing Strategies* (see Marmot
- Report and the Social Care Act 2012 – aimed at reducing health and social inequalities)
- *Healthwatch* (for local anecdotal data)

Application:

- Each borough to provide a **Social Needs Assessment** within their *Development Plan* and *Local Plan*, referred to within the *Core Strategy* and detailed as a Supplementary Planning Document, which must be kept updated
- This requirement could be inserted at Policy D2 of the Draft New London Plan, by dividing item ‘A’ into two parts. New ‘A’ to be an evaluation of socio-economic and well-being factors, heritage/ character and social infrastructure (currently points 1, 7 and 11); and new ‘B’ an evaluation of the data relating to physical and environmental factors (all the remaining points)

- Local authorities, Clinical Commissioning Groups and other service providers to take steps to address existing social needs, identified in the Social Needs Assessment and against agreed benchmarks, as a pre-requisite for designating *Opportunity Areas*, *Local Areas for Regeneration* and *Strategic Areas of Regeneration*
- *Supplementary Planning Guidance* (SPG) to be prepared (perhaps combined with the SPG on Social Infrastructure currently being reviewed - see below). This must be referenced in all strategic and major development proposals, with the inclusion of a Social Needs Assessment and a strategy for how identified local social needs and well-being are to be taken into account
- *Design Review Panels* to consider strategies to address social needs and well-being as an agreed component of the quality of a design. This must also to form part of the Mayor's planned Guidance on Design Reviews
- *Post-occupancy Surveys* (RIBA Plan of Work Stage 7) to become a contractual obligation for all major housing developments, at 1 year and 5 years after full occupancy. This will be an invaluable reference point for Development Plans and should be obligatory

[Policy GG2: 1.3.1, 1.3.2
Policy GG3: A, D
SD9: 2.10.2, 2.10.1, 2.10.3, 2.10.4; 2.10.5
Policy D2: A
Policy H13: 4.14.1
Policy S2: A: 1; 5.2.7, 5.2.8]

User: Metropolitan Police Service

Policy D2 Delivering good design Initial evaluation
E Design and access statements submitted with development proposals should provide relevant information to demonstrate the proposal meets the design requirements of the London Plan.
The MPS supports this as it actively encourages early consultation with DOCOs during the design process.
Maintaining design quality
H The design quality of development should be retained through to completion by:
1) having a sufficient level of design information, including key construction details provided as part of the application to ensure the quality of design can be maintained if the permitted scheme is subject to subsequent minor amendments
2) ensuring the wording of the planning permission, and associated conditions and legal agreement, provide clarity regarding the quality of design
The MPS supports this policy as it not only promotes consultation with DOCOs but also encourages inclusion of key specifications and standards at design stage.
3.2.8 The scrutiny of a proposed development's design should cover its layout, scale, height, density, land uses, materials, architectural treatment, detailing and landscaping.
The design and access statement should explain the approach taken to these design issues and be used to consider if a scheme meets the requirements of Policy D1 London's form and characteristics (see also requirements of Policy D3 Inclusive design).
The MPS agree with this in principle as a Design and Access statement allows the developer to explain at any early stage how crime and ASB issues will be addressed in their proposal and the incorporation of Secured by Design measures.
3.2.10 It is generally beneficial to the design quality of a completed development if the architectural design team is involved in the development from start to finish 24. Consideration should be given to securing the design team's ongoing involvement as a condition of planning permission, or as a design reviewer where this is not possible. (24 Mayor's Design Advisory Group. Shaping London: How can London deliver good growth? 2016)
The MPS supports this as it encourages continuity through the entire design and build process and enables the effective integration of Secured by Design measures. This strategic approach to crime prevention will also enhance sustainability.

User:	Footwork Architects Limited

- ‘Social heritage’ to be inserted at Policy D2 A of the Draft New London Plan, at current point 7 (historical evolution and and heritage assets)

User: DTZ Investors

Scope of the London Plan and deviation from National Planning Policy

General concern is raised that with respect to the admission in the “Introducing the Plan” section that “the Plan deviates from existing national policy and guidance” on the basis that “the Plan is delivering on a specific Mayoral commitment”. It is a fundamental requirement for the London Plan to be consistent with National Planning Policy with Section 337(6)(a) of The Greater London Authority Act 1999 as the Secretary of State has the power to impose a direction to the Mayor of London not publish the London Plan if there is “any inconsistency with current national policies or relevant regional planning guidance”.

In this context, further concern is expressed that the Draft London Plan contains policies that are too detailed and overly prescriptive for a document which is to comprise the Spatial Development Strategy for London and is required by law (under Part VIII, Section 334 of The Greater London Authority Act 1999) to ‘deal only with matters which are of strategic importance to Greater London’.

In this context, particular concern is raised in respect the policies which set out requirements for design scrutiny (Policy D2); detailed internal space standards for housing and hotels (Policies D4 and E10); requirements for hot food takeaways (Policy E9) and temporary/’meanwhile’ uses (Policy H4), as containing a level of detail which goes far beyond the remit for the London Plan, which should addressed by local planning policies and supplementary planning guidance as appropriate, to meet individual boroughs’ needs and requirements. These policies in particular should be deleted or amended to ensure the emerging London Plan accords with the requirements of The Greater London Authority Act 1999.

User: Footwork Architects Limited

- Each borough to prepare a Demographic Profile, forming the basis of the *Local Plan* and *Development Plan.* This be inserted at Policy D2 A, as a formal component of the proposed ‘evidence gathering and evaluation’
- Demographic Profiles to be considered, against agreed benchmarks, as a pre-requisite for designating *Opportunity Areas*, *Local Areas for Regeneration* and *Strategic Areas of Regeneration*
- Require *Design and Access Statements* for all development proposals to detail measures to create or improve integration, referencing the demographic profile of the area
- Integration to be addressed as a standard part of *RIBA Plan of Work Stage 0*
- Novation to be required on socially complex projects, to ensure the design teams continued scrutiny
- Pre-application and planning processes to ensure that measures to address integration and inclusion (such as tenure mix, proportion of social rent and affordable homes) are non-negotiable
- Limit the use of ‘exceptional circumstances’, by restricting it to a percentage of applications
- D*esign Review Panels* (and the *Mayor’s Design Advocates*) to have a specific responsibility to address social inclusion and integration, against agreed criteria; also to be included in the *Mayor’s Guidance on Design Review*
- GG1 (Building Strong and Inclusive Communities), is only outlined as generalities, or aspirations. This should be adjusted in light of the above
- D3 (Inclusive Design) must be broadened to include social inclusion as well as spatial/physical inclusion

User:	Landscape Institute London
3.1.4, 3.2.8, D7 A and elsewhere - the word ‘landscaping’ should be replaced by landscape treatment, equivalent to ‘architectural treatment’. ‘Landscaping’ is a catch-all term with little meaning. Also it implies that ‘landscaping’ is detached from other elements and potentially seen as an optional add-on. If more planting is meant, then say so.	

User:	Landscape Institute London

3.2.7 LI London suggests that in addition to planning case officers and ‘qualified urban design officers’, that (Chartered) Landscape Architects should also be included in design scrutiny. LI London also recommend that the GLA requires ALL boroughs to appoint and run design review panels. Many don’t and the result is that too many poor schemes go through the planning system unchallenged.

User:	London Sustainable Development Commission

Sustainable design - The commission is concerned that the Plan should state more clearly that design quality including sustainable design standards should be considered over the long term beyond completion to ensure that buildings are performing as intended at design stage. This should be picked up in Policy D2 (H) and supporting text.

User: Arup Building Engineering Team

We support the approach to review designs by discipline experts early in the planning process to avoid locking in poor design approaches. This policy offers the opportunity to robustly control the technical execution of other policies such as the impact of tall buildings on the urban environment and the inclusion of truly sustainable infrastructure described in chapter 9's policies.

It is important that planning departments are able to access the skills necessary to review at a technical level, particularly where projects will have a significant long-term impact.

It is recommended that Policy D2 should require consideration of adaptability to changes of use through a building's lifecycle, as well as a building's deconstruction at end of life. These could be required as part of a design access statement, to ensure that elements 3.1.9 - 3.1.12 are applied to building design.

User: Highgate Society

D2 Support

This policy is generally supported with the following caveats..

The Boroughs are being asked to prepare new development plans according to the points set out in D1 to determine capacity for growth. It is also unclear who will prepare the masterplans and design codes bearing in mind the resources and skill shortages in planning departments. This task must not be taken over by private sector since it takes decisions out of local hands, and may well give rise to a conflict of interest since may private sector consultants may be handling other projects for the same applicants.

D2A (7) Support

As in the response to GG2 the Society feels that the heritage assets are inadequately protected in London. There must be a policy to "protect" heritage assets..

D2F and D2G Support and Comment

The importance of design reviews is welcomed but this policy falls well short of ensuring it happens on any but the most extreme developments. Only projects referable to the Mayor and optimising density or falling into the category of tall buildings must undergo design scrutiny/design reviews. This excludes a whole raft of other development

There should be a greater obligation to use design review panels written into the plan. The Design Review comments should be made public i.e. on the planning website, and in timely manner so that public and other interested partied such as the Victorian Society can comment if they so wish

D2H Strongly support

This is welcome. Too many schemes changes architect after planning is gained with a high quality design architect being supplanted by the developer's own production drawing firm, with very often, heavy cost cutting as well a loss of detail. Some built schemes are unrecognisable from that which has gained planning approval.

User:	Natural England

Existing and newly provided greenspace will need to be designed to cater to higher densities of people whilst minimising impacts on biodiversity. Please refer to our comments on Policy D6 below for our recommendation on this matter.

User:	Chairs of Camden's Conservation Area Advisory Committees

D2 A7 We welcome this clause.

D2 D Design Codes General 1: we are concerned by the reference to Design Codes and their effectiveness. There must be concern that the NPPF's statement (36) that design codes should 'avoid overly prescriptive detail' may make them an inadequate mechanism for managing density (**D6**) in complex and sensitive heritage areas. See also policy **H2 B 2**.
General 2: We are also very concerned over who prepares Design Codes. They need to be undertaken transparently in collaboration with local communities to be consistent with the Mayor's objectives.
Our proposed amendments – reasoning: To achieve effective policy implementation, and consistency with the Mayor's objective of working collaboratively with local communities.
Our proposed revised text: to ADD 'Design Codes should be prepared by Boroughs transparently and in collaboration with local communities, respecting local distinctiveness, and preserving and enhancing heritage assets.'

D2 G 4 Draft policy: 'design review recommendations are appropriately recorded and communicated to officers and decision makers'
Our proposed amendments – **reasoning**: to ensure consistency with the requirement for transparency at D2 G 1. Our experience is that, while design review is welcome, it lacks transparency, and is not open to scrutiny. Our amendment seeks to address both the means of better achieving high quality design, and the need to build trust in democracy.
Our proposed revised text: 'design review recommendations are appropriately recorded and communicated to officers and decision makers, and made public for scrutiny in good time before officers' recommendations are prepared.'

User: CIBSE

We support the importance given to design and are broadly supportive of the proposed approach, starting with early site analysis including environmental factors.

We agree it is essential to maintain attention on quality throughout the design development and construction. This is often not the case, particularly as implementation and monitoring or planning conditions is left to local authorities which do not always have appropriate resources for it. We encourage the Mayor to provide guidance and examples of best practice to the Boroughs.

Feedback from CIBSE members and others across the industry is that the current design review process could be improved, with more time allocated to the reviews for proper interrogation and, at least on major developments, a number of design reviews at key stages rather than a single one-off exercise.

Ultimately, we want to deliver good buildings, not just good design. It should be noted that the Independent Review of Building Regulations and Fire Safety currently being undertaken by Dame Judith Hackitt has noted the frequent disconnection between design and construction and the operating life of buildings. We would encourage the Mayor to take steps to help to ensure that good designs deliver good buildings, and to take full account of Dame Judith's final report when it is published later this year. It may be that some aspects of her report will be able to inform the final text of the London Plan.

User:	Sustrans
D2 A 4 & 5 – Collaboration in the wider South-East Strongly support the requirement for boroughs to evaluate transport networks, particularly walking and cycling networks, in preparing Development Plans and Area Based Strategies.	

User:	Gravesham Borough Council

Design
The document dedicates an entire chapter to design with 13 design policies, and shows a significant commitment by the Mayor for good design and architecture. One of these policies, Delivering Good Design, is particularly sensible as it includes steps for maintaining design quality through to a project's completion with a proposed measure allowing local councils to use 'architect-retention clauses in legal agreements where appropriate'. This is particularly viewed as an issue under Design and Build where architects are often not novated.

User: Design Council

Design Scrutiny

27. As a leading provider of Design Review nationally, we support the promotion of its use as a tool to scrutinise and improve the quality of development proposals. Design Review is a tried and tested method of promoting good design and is a cost-effective and efficient way to improve quality. It offers independent, impartial advice on the design of new buildings, landscapes, public spaces and components of the infrastructure networks. We are, however, aware of the limitations of design review as a tool, particularly if not set within a strategic framework and linked to a properly resourced system to take forward the insights gained from its use. Crucially it does not substitute a well-resourced and proactive planning department containing staff with appropriate design skills and knowledge. Requiring schemes to go to design review does not provide a magic bullet to improve/ resolve design quality as ultimately this will need to come from design teams and be approved through the planning system.

User: Design Council

28. We are also concerned by the implication in policies D2 and D4 that schemes that are higher in density or height require greater design scrutiny than other schemes. Whilst we agree that higher/ denser/ larger schemes require commensurate scrutiny, the importance of smaller schemes in shaping the character and liveability of London is often as significant and will often warrant a high level of design scrutiny. Crucially the cumulative impact of these developments is city wide. Clearly, scrutinising smaller schemes will be the remit of local planning authorities rather than the GLA but in our view it would not be advisable to imply that smaller schemes require less design scrutiny or that they are less likely to benefit from tools such as design review.

29. We support the Mayor's guidance on review principles, process and management set out in the draft new London Plan and elsewhere, which are based on our 2013 guidance on 'Design Review: Principles and Practice'.

User: Design Council

Maintaining Design Quality

31. We support the emphasis on maintaining design quality after the grant of planning permission in Policy D2 (h). This is another area of planning work that depends upon planning departments having access to capacity and skills, in order to properly understand the detailed design of buildings, construction methods and use of materials.

32. We support the promotion of architect retention clauses in legal agreements and note that these could also apply to other members of a design team. These clauses should only be used where appropriate and when consistent with existing contractual agreements. Where planning officers are considering requesting this clause it should be raised as early as possible (e.g. during pre-application stage) and should be appropriately evidenced and reasoned.

User:	Hornsey & Wood Green Labour Party

We agree with the aim to identify an area’s capacity for growth, the most efficient use of land, design quality, taking into account existing character and context and to engage Londoners in the planning process.

User: Mr Gary Hayes

Policy D2 Delivering good design

We have concerns about how ‘good’ design may be determined and who determines this. As expressed in response to D1 this should be about clear measurable standards.

Re: Initial evaluation.

(A) Add – ‘Detailed discussion with local existing and immediately neighbouring residential and small business communities should be carried out in relation to any proposed ‘growth’ area should also be carried out. This should relate to their key concern and assessed needs.’ Re: Determining capacity for growth

(B) Initial evaluations should also include a social impact assessment of any proposals to ensure sustainable growth and specific benefit to existing communities is achieved. Re: Design quality and development certainty

(D) Master planning and any design codes should be informed through careful engagement with local communities, measurable standards and social impact assessments. Re: Design Scrutiny

(F) Design reviews must involve representatives of the local community, who must be informed by wider community views – e.g. through being mandated through networks of community and voluntary sector groups. In addition, a full and detailed description of what ‘good design’ must be developed to support this policy, if monitoring of any achievement or otherwise, is to be assessed.

User:	Landsec
D2, Part H, 4: we believe it is not relevant, nor appropriate for the plan to suggest the use of “architect retention clauses in legal agreements” and respectfully ask that this text be deleted from the Policy	

User: Redrow Homes London Division.

Under Part A 3) of this policy LPAs are encouraged to undertake a borough wider assessment of appropriate building heights and densities for an area, which will then be used to identify the growth capacity of an area and be cited for planning applications. This broad-brushed approach is inconsistent with the discretionary planning system that operates in England and which requires each application to be considered on its own merits.

The approach suggested could lead to policies and guidance artificially constraining the full development potential of sites. The true test of development capacity should be properly tested at the planning application stage.

We suggest that paragraph 3.2.3 acknowledges that any broad assessments undertaken by LPAs are indicative and that the design of schemes should be ‘design-led’ (as set out in Policy D6). Development should not be artificially constrained by onerous height or density restrictions where a clear design rationale can be demonstrated.

User: Redrow Homes London Division.

The draft London Plan does not provide guidance on the circumstances when schemes should go before Design Review Panels.

The draft London Plan presumes that design review will always be a positive process. However, development proposals emerge from extensive work by the applicant's team and interaction with the local planning authority, Greater London Authority (where referable) and other stakeholders.

By comparison, design reviews will typically spend only hours appraising a scheme. Panellists may not be as well informed as they might about the relevant opportunities and constraints.

Experience indicates that the views of panels can be afforded too much weight. Moreover, the panel's view will not always be correct. All planning consultants will have worked on schemes where both Planning Officers and the applicant have firmly disagreed with a panel.

The draft London Plan should be redrafted to provide clarity on the circumstances when schemes should go before Design Review Panels. There is a risk otherwise that schemes encounter unnecessary delay and additional cost through disproportionate use of the Design Review process. Local Boroughs are well-equipped to exercise discretion on this point.

It is essential that Part G of Policy D2 revisits the statement ‘schemes show how they have considered and addressed the design review recommendations’ to read: ‘schemes show how they have considered the design review recommendations and where an applicant disagrees with advice provided they should provide justification for their own response’.

The supporting text to Policy D2 should emphasise that design review is a process of critically appraising a scheme and the design justification for it. It should make clear that the purpose of the design review process is to help better outcomes emerge but that it is not intended to dictate the design of a scheme.

User: Redrow Homes London Division.

The policy seeks inter alia:

‘3) avoiding deferring the assessment of the design quality of large elements of a development to the consideration of a planning condition or referred matter
4) local planning authorities using architect retention clauses in legal agreements where appropriate’

Point 3 should be removed. The London Plan should recognise that such an approach will not be appropriate for phased developments and outline planning permissions. This can be adequately addressed via Reserved Matters and planning conditions.

Point 4 should be removed. This creates a ransom situation for a developer as an architect is not competing in the open market for work. There are equally no grounds to believe that standards will be higher, given an architect will be under no particular pressure to perform to the very highest of their abilities. More detailed design matters should continue to undergo assessment by decision-makers.

User:	Redrow Homes London Division.
If this approach forms is advocated by the Plan it is essential that it applies to only larger strategic schemes and that the draft London Plan provides explicit guidance on a suitable threshold. Otherwise producing such models may involve considerable and disproportionate expense for applicants. This could be a further barrier to the delivery of development.	

User: Andrea Carey Fuller

We have concerns about how ‘good’ design may be determined and who determines this. As expressed in response to D1 this should be about clear measurable standards.

Re: Initial evaluation.

Add – ‘Detailed discussion with local existing and immediately neighbouring residential and small business communities should be carried out in relation to any proposed ‘growth’ area should also be carried out. This should relate to their key concern and assessed needs.’

Re: Determining capacity for growth

Initial evaluations should also include a social impact assessment of any proposals to ensure sustainable growth and specific benefit to existing communities is achieved.

Re: Design quality and development certainty

Master planning and any design codes should be informed through careful engagement with local communities, measurable standards and social impact assessments.

Community-led housing should be used as a starting point for all sites and using tools such as Community Collaborative Planning (http://www.jtp.co.uk/cms/pdfs/Civic-Voice_Collaborative-Planning-for-All_20_pager_final_p.pdf)

Re: Design Scrutiny

Design reviews must involve representatives of the local community, who must be informed by wider community views – e.g. through being mandated through networks of community and voluntary sector groups.

In addition, a full and detailed description of what ‘good design’ must be developed to support this policy, if monitoring of any achievement or otherwise, is to be assessed.

User:	eCountability Ltd

Policy GC2 Delivering good design

We support this policy. Its full implementation through Development Plans is essential to deliver Policy D1.

User:	Public Health England

? In relation to building design, PHE recommends particular consideration be given to lighting. There is strong evidence that increasing the likelihood of intervention by a third party during a suicide attempt, for example by improving lighting which can eliminate hiding places or make suicidal individuals conspicuousxiv, taken with other interventions significantly reduced the number of suicides per year xv

User: L&Q

Building heights

Under Part A 3) of this policy LPAs are encouraged to undertake a borough wider assessment of appropriate building heights and densities for an area, which will then be used to identify the growth capacity of an area and be cited for planning applications. This broad-brushed approach is inconsistent with the discretionary planning system that operates in England and which requires each application to be considered on its own merits. The approach suggested could lead to policies and guidance artificially constraining the full development potential of sites. The true test of development capacity should be properly tested at the planning application stage.

We suggest that paragraph 3.2.3 acknowledges that any broad assessments undertaken by LPAs are indicative and that the design of schemes should be ‘design-led’ (as set out in Policy D6). Development should not be artificially constrained by onerous height or density restrictions where a clear design rationale can be demonstrated.

User: L&Q

Design reviews

The draft London Plan does not provide guidance on the circumstances when schemes should go before Design Review Panels. The draft London Plan presumes that design review will always be a positive process. However, development proposals emerge from extensive work by the applicant's team and interaction with the local planning authority, Greater London Authority (where referable) and other stakeholders. By comparison, design reviews will typically spend only hours appraising a scheme. Panellists may not be as well informed as they might about the relevant opportunities and constraints. Experience indicates that the views of panels can be afforded too much weight. Moreover, the panel's view will not always be correct.

Design reviews ought to be described as 'quality reviews'. There should be a strong emphasis in the London Plan that this is to be a positive process, led by the Borough and informed by an understanding of the development issues. The draft London Plan should be redrafted to provide clarity on the circumstances when schemes should go before Design Review Panels. There is a risk otherwise that schemes encounter unnecessary delay and additional cost through disproportionate use of the Design Review process. Local Boroughs are well-equipped to exercise discretion on this point. It is essential that Part G of Policy D2 revisits the statement 'schemes show how they have considered and addressed the design review recommendations' to read: 'schemes show how they have considered the design review recommendations and where an applicant disagrees with advice provided they should provide justification for their own response'. The supporting text to Policy D2 should emphasise that quality review is a process of critically appraising a scheme and the design justification for it. It should make clear that the purpose of the review process is to help better outcomes emerge but that it is not intended to dictate the design of a scheme.

User: L&Q

Maintaining design quality

The policy seeks inter alia: ‘3) avoiding deferring the assessment of the design quality of large elements of a development to the consideration of a planning condition or referred matter 4) local planning authorities using architect retention clauses in legal agreements where appropriate’

Point 3 should be removed. The London Plan should recognise that such an approach will not be appropriate for phased developments and outline planning permissions. This can be adequately addressed via Reserved Matters and planning conditions. Point 4 should be removed. Circumstances change. This also creates a ransom situation for a developer as an architect is not competing in the open market for work.

User: L&Q

Design analysis and visualisation

Part C of this policy states that ‘where appropriate, visual, environmental and movement modelling/assessments should be undertaken to analyse potential design options for an area, site or development proposal’. Situations where this will be ‘appropriate’ are not defined.

If this approach forms is advocated by the Plan it is essential that it applies to only larger strategic schemes and that the draft London Plan provides explicit guidance on a suitable threshold. Otherwise producing such models may involve considerable and disproportionate expense for applicants. This could be a further barrier to the delivery of development.

User: Socialist Health Association London

Policy D2 Delivering good design

We encourage all new design to include reference to INCLUSIVITY & ACCESS

We also recommend that PLAY SPACE is given additional attention

- one new development observed in S London includes a tiny play space squeezed between two tower blocks next to a railway bridge and right on top of high density traffic

User: dp9

Policy D2 – Delivering good design

We wholeheartedly support the ambition of this policy, but consider that some elements are overly prescriptive. In particular:

? The requirement at F for referable development proposals which are of a high density or include a tall building to have undergone at least one design review before a planning application is made. Whilst design review panels are one method of ensuring high quality design, they are not made available in all boroughs and those that do exist are not of a consistent quality. They are just one potential way to ensure good design, and should not be made a requirement. Instead, policy should require robust design scrutiny, but allow local authorities the flexibility to determine how this is best achieved;

? Part H which stipulates how boroughs should attach conditions, and suggesting that design quality should not be deferred to reserved matters (although the Draft Plan uses the term 'referred' matter, we presume it means reserved). We object to the request to provide construction details at planning stage when this will be prior to the involvement of a contractor, and therefore unreasonable to request. Scale and external appearance are matters capable of being reserved, and this will remain a statutory right for any applicant – especially on large and complex masterplan developments which may be designed and delivered over a long time period. In these situations, design codes provide part of the solution, but it would remain within the scope of an outline permission to reserve much of the design to the reserved matters stage. Battersea Power Station provides a good example of the benefits of allowing much of the detail to come through reserved matters, as it has brought forward detailed designs by world class architects such as Foster + Partners and Gehry Partners within a Design Code approach. Had
the Design Code been too prescriptive, the variety and innovation of these designs would nothave been possible;

? The indication that boroughs should use architect retention clauses in legal agreements 'where appropriate' and the subsequent supporting text at paragraph 3.2.10 goes beyond what should be considered appropriate for this strategic document, and is unduly onerous. Such requirements can present unnecessary contractual difficulties for developers, and should only be required where a specific architectural practice has been used to gain planning permission for development that goes beyond the bounds of what may otherwise have been granted using an architect of lesser quality; and

? Paragraph 3.2.9 provides guidance to boroughs on the use of conditions to avoid ‘value engineering’ through future amendments. Minor amendments that are not referable to the GLA should not be considered in the Draft London Plan, and amendments post planning permission to make a scheme more deliverable are a natural part of the design process – especially where there is greater pressure on the financial viability process and greater cost and time involved in securing planning permission in the first place. Preventing or overly constraining this process will have a detrimental impact on delivery.

RECOMMENDATION: We request the following amendments to this policy:

? Amend Part F to remove the mandatory requirement for design review to acknowledge that not all Boroughs have a design review function, and that design review is not always necessarily the most appropriate method of ensuring high quality design;

? Amend Part H to remove the requirement for construction details at planning stage, and to refer only to architect retention clauses in exceptional circumstances, not as a matter of course;

? Amend paragraph 3.2.9 to reduce the scope of intervention into minor amendment applications and changes once planning permission has been granted.

User: Taylor Wimpey UK

Policy *D2* Delivering Good Design.

We are fully supportive of the objective to achieve good design. This is fundamental to good placemaking principles and creating sustainable communities.

To establish the most appropriate form of development for an area, the Policy should require Councils to undertake early engagement and collaboration with the neighbourhoods, local organisations, and businesses, including land owners and developers.

The Policy should also be amended to reflect paragraph 173 of NPPF to ensure the sites and the scale of develop ment identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.

The level of information required from applicant s should be proportionate to the nature and scale of development proposals and should not present a barrier to applicants. We are concerned that the level of supporting details (e.g digital modelling) and engagement required could represent a barrier to the promotion of housing schemes due to the risk of associated costs and delay, particularly for SME's and developers of Small Sites.

We are supportive of pre-application engagement, that can assist in helping speed up the process and resolve any issues as early as possible. However, local authorities cannot require that a developer engages with them before submitting a planning application, but should encourage take-up of any pre-application services they do offer.

Policy requmng architect retention clauses in legal agreements or as a condition of planning permission is unreasonable and unlikely to satisfy the tests under Reg 122(2) of the CIL Regulations (2010) and should be deleted.

For the above reasons we object to Paragraphs F, G and H of Policy GG4 and Sub paragraphs 3.2.4, 3.2.5, 3.2.7, and 3.2.10.

User: Aberfeldy New Village LLP

Policy D2 Delivering Good Design

We support the ambition set out in Part B of this policy to ensure the most efficient use of land is made so that development on all sites is optimised. However, the draft Plan should not result in planning decisions taking even longer than they do already, such an outcome would place the delivery of the Plan in jeopardy.

In this regard parts E and F should be deleted. Not all authorities will have the officer time available to undertake this level of design review and it will slow down the planning process.

User:	Kingston First

Kingston First strongly supports a design-led approach to development and significant public benefits which can be achieved through the provision of high quality public spaces and buildings. Kingston First therefore support the wording of draft Policy D2 and its role in promoting and delivering good design.

User:	BA Pension Trustees, Nationwide Pension Fund Trustee & National Grid UK Pension

With regards to Policy D2 Delivering good design the consortium are concerned that Part H (3) states that assessment of design quality should not be deferred to referred matters. This would in effect prevent developers from pursuing outline applications with matters of appearance, layout and scale reserved. Outline planning consents are an integral and established part of the planning system and a particularly important tool for unlocking development on large, complicated sites. Restricting developers ability to use outline planning applications for large developments would represent a major constraint that it likely to slow down delivery. It is particularly difficult to envisage how a largescale masterplan that delivers consolidation of industrial land in a phased manner could be carried out without an initial outline consent.

User:	BA Pension Trustees, Nationwide Pension Fund Trustee & National Grid UK Pension

Policy D2 Delivering good design

H ~~3)avoiding deferring the assessment of the design quality of large elements of a development to the consideration of a planning condition or referred matter~~

User: Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living

D2 (102) - Delivering Good Design

Design principles should be locally derived and inevitably each LPA will apply their own area based design criteria. There is a danger that design requirements will be blurred by both local and DLP requirements.

The Mayor wants to see more details submitted as part of planning applications. While we understand the Mayor's desire to maintain the quality of designs through the planning process, this will add greater pressure to the submissions and programme to prepare additional drawings. Which goes beyond strategic planning and will not, in some instances serve to markedly improve the quality of development but may serve to make it less viable.

Objection: This policy is not positively prepared, nor has the design criteria been found to be viable for development and as such is not justified. We also consider the policy to be inconsistent with national planning policy as it is overly prescriptive for a strategic document. We respectfully request that it should be amended or removed.

User:	Durkan

Policy D2 (Delivering good design) encourages LPA’s to undertake an initial evaluation of the capacity for growth in boroughs and to identify the most efficient use of land. It encourages developing at densities above those of the surrounding area on most sites and that design of the development must optimise housing density to deliver homes. Policy D6 (Optimising housing density) states that proposed residential development that does not demonstrably optimise the housing density of the site in accordance with this policy should be refused.

Durkan supports this approach

User: Urbanissta

Policy D2 Delivering Good Design

Design scrutiny – Policy D2 requires design reviews to be undertaken at least once in addition to pre-application advice if they are:

- Above the density indicated in Policy D6
- Propose a building defined as tall building or that is more than 30m in height where there is no local tall building definition.

Comment: The preparation of Design Codes may slow down development (target 65,000dpa). A system will need to be implemented to speed up the plan making process if all 35 Boroughs are expected to adopt design codes especially for small sit delivery which benefit from the 'permission in principle' and the 'presumption in favour'.

Each LPA will have a different definition of 'tall building'. A standardised approach should be applied.

User:	London Borough of Camden

We support the objectives of policy D2, and in particular welcome Part H on Maintaining Design Quality, which provides a strengthening of the policy requirement to ensure that design quality is maintained from the granting of planning permission through to completion of a development. We anticipate that there may be resistance from developers to the use of architectural retention clauses in legal agreements, but are of the view that the careful wording of such agreements to allow some flexibility in the appointment or architects of an equivalent level of experience and standing should overcome these concerns.

User: Battersea Project Land Company Limited

Policy D2 – Delivering good design

We wholeheartedly support the ambition of this policy, but consider that some elements are overly prescriptive. In particular:

? The requirement at F for referable development proposals which are of a high density or include a tall building to have undergone at least one design review before a planning application is made. Whilst design review panels are one method of ensuring high quality design, they are not made available in all boroughs and those that do exist are not of a consistent quality. They are just one potential way to ensure good design, and should not be made a requirement. Instead, policy should require robust design scrutiny, but allow local authorities the flexibility to determine how this is best achieved;

? Part H which stipulates how boroughs should attach conditions, and suggesting that design quality should not be deferred to reserved matters (although the Draft Plan uses the term 'referred' matter, we presume it means reserved). We object to the request to provide construction details at planning stage when this will be prior to the involvement of a contractor, and therefore unreasonable to request. Scale and external appearance are matters capable of being reserved, and this will remain a statutory right for any applicant – especially on large and complex masterplan developments which may be designed and delivered over a long time period. In these situations, design codes provide part of the solution, but it would remain within the scope of an outline permission to reserve much of the design to the reserved matters stage. Battersea Power Station provides a good example of the benefits of allowing much of the detail
to come through reserved matters, as it has brought forward detailed designs by world class architects such as Foster + Partners and Gehry Partners within a Design Code approach. Had the Design Code been too prescriptive, the variety and innovation of these designs would not have been possible;

? The indication that boroughs should use architect retention clauses in legal agreements ‘where appropriate’ and the subsequent supporting text at paragraph 3.2.10 goes beyond what should be considered appropriate for this strategic document, and is unduly onerous. Such requirements can present unnecessary contractual difficulties for developers, and should only be required where a specific architectural practice has been used to gain planning permission for development that goes beyond the bounds of what may otherwise have been granted using an architect of lesser quality; and

? Paragraph 3.2.9 provides guidance to boroughs on the use of conditions to avoid ‘value engineering’ through future amendments. Minor amendments that are not referable to the GLA should not be considered in the Draft London Plan, and amendments post planning permission to make a scheme more deliverable are a natural part of the design process – especially where there is greater pressure on the financial viability process and greater cost and time involved in securing planning permission in the first place. Preventing or overly constraining this process will have a detrimental impact on delivery.

RECOMMENDATION: We request the following amendments to this policy:

? Amend Part F to remove the mandatory requirement for design review to acknowledge that not all Boroughs have a design review function, and that design review is not always necessarily the most appropriate method of ensuring high quality design;

? Amend Part H to remove the requirement for construction details at planning stage, and to refer only to architect retention clauses in exceptional circumstances, not as a matter of course;

? Amend paragraph 3.2.9 to reduce the scope of intervention into minor amendment applications and changes once planning permission has been granted.

User:	Age UK London - a charity working with older Londoners

POLICY D2: ‘DELIVERING GOOD DESIGN’

PROPOSED POLICY AMENDMENT:
1) TO EXPLICITLY MENTION LONDON’S AGEING POPULATION AND DISABILITY FACTORS AS IMPORTANT SOCIO-ECONOMIC DATA TO HAVE REGARD TO.
2) ADD INTO THE POLICY THE NEED FOR COMMUNITY ENGAGEMENT WITH LOCAL PEOPLE AND VOLUNTARY ORGANISATIONS AT ALL STAGES.

User:	Age UK London - a charity working with older Londoners

23. D2 LINK TO POLICY CHANGE Once again, the insertion of the policy amendments signals a consistent requirement to provide for a an ageing population and to the fact that community engagement with proposed new developments is essential for the success of the project, where success is taken to mean well designed developments and strengthened communities.

User: Regeneration X

Policy D2 Delivering Good Design
A – '*To identify an area's capacity for growth and understand how to deliver it in a way which strengthens what is valued*'. But the draft London Plan has/is already identifying how much growth each London Borough is to take!

The ambitions for high quality design are all well and good when set out in a policy document, but the policy needs to be delivered and experience shows that developers too easily opt out of these requirements. The intensification of London and London's suburbs, and outer London's town centres, requires very high quality urban design, followed through by high quality management and maintenance We know from experience that this will not happen. The London Plan is specifying a highly 'engineered' urbanism which we know will not be delivered. What is really required is a more loose fit, flexible, urbanism.

Generally, the draft London Plan seems to just assume that London grows and London responds to this rather than pro-actively managing the UK's economy and growth. Conversely there seems to be no conception of what happens if and when London stops attracting the UK's and world's population.

User:	Joy Brown

Policy D2 Delivering good design. Design scrutiny. F Design Reviews: to date these are a joke. In a nearby area a developer is being allowed to build 10 storey buildings despite the location not being approved for buildings of that height in the Local Plan.

User:	Crest Nicholson PLC

a) Policies D2 and D6- the impact of optimisation of densities may mean that higher buildings need to be constructed. Currently, construction of buildings beyond 18m and also 30m both result in dramatic increases in build costs having a potential negative impact on project viability. Higher buildings may not be appropriate outside of Zone 1 for many reasons including design but also because the sales prices potentially achievable in Zone 1, that enable the increased build costs associated with tall buildings to be borne, are not achievable outside of Zone 1; When this is considered in the context of increased design scrutiny for high density schemes there is a real risk of policy which is intended to increase delivery will do the very opposite. The Hackett Review is being conducted as regards Building Regulation changes and it is expected to have a direct bearing on tall buildings and the build costs associated with construction above a certain height.

User:	Crest Nicholson PLC
b) Policy D2- increased requirements at application stage will increase the cost and add further delay in the submission of planning applications;	

User: Primrose Hill Conservation Area Advisory Committee

D2 A7 We welcome this clause.

D2 D Design Codes General 1: we are concerned by the reference to Design Codes and their effectiveness. There must be concern that the NPPF's statement (36) that design codes should 'avoid overly prescriptive detail' may make them an inadequate mechanism for managing density **(D6)** in complex and sensitive heritage areas. See also policy **H2 B 2.**

General 2: We are also very concerned over who prepares Design Codes. They need to be undertaken transparently in collaboration with local communities to be consistent with the Mayor's objectives.

Our proposed amendments – reasoning: To achieve effective policy implementation, and consistency with the Mayor's objective of working collaboratively with local communities.

Our proposed revised text: to ADD 'Design Codes should be prepared by Boroughs transparently and in collaboration with local communities, respecting local distinctiveness, and preserving and enhancing heritage assets.'

D2 G 4 Draft policy: 'design review recommendations are appropriately recorded and communicated to officers and decision makers'

Our proposed amendments – reasoning: to ensure consistency with the requirement for transparency at D2 G 1. Our experience is that, while design review is welcome, it lacks transparency, and is not open to scrutiny. Our amendment seeks to address both the means of better achieving high quality design, and the need to build trust in democracy.

Our proposed revised text: 'design review recommendations are appropriately recorded and communicated to officers and decision makers, and made public for scrutiny in good time before officers' recommendations are prepared.'

User:	Mr Colin Bannon
3.2.2 reference GLA’s Character & Context SPD 3.2.8 For DAS - D1 and D2?	

User: Ms barbara weiss

1. D2 A ...which strengthens what is valued in a place, **AND WHAT INSTEAD COULD UNDERMINE IT OR HARM ITS CHARACTER**
2. D2 A 1a) **LOCAL CHARACTER**
3. D2 A 3 **PREVAILING MATERIALS AND QUALITY OF PUBLIC REALM**
4. D2 A 7 a) and heritage assets....**VIEWS**
5. D2 B appropriate and **SYMPATHETIC TO CONTEXT**
6. D2 C **THE USE OF 3D MODELS SHOULD BE A COMPULSORY TOOL FOR ALL PLANNING APPLICATIONS RELATING TO TALL BUILDINGS, AS WELL AS TO BUILDINGS TALLER THAN THEIR IMMEDIATE NEIGHBOURS, TO ALLOW FOR A FULL EVALUATION OF IMPACT AT CLOSE QUARTERS, AS WELL AS FROM A DISTANCE.**
7. D2 D **PRESCRIPTIVE DESIGN CODES** should be devised and agreed, in order to ensure that materials appropriate to context are used and detailing is generally of high standard
8. D2 F All London Boroughs must have access to highly qualified and experienced **Design Review Panels,** whose opinion will be sought and taken into account as part of the planning process for all medium to large developments. Large developments and any above 30 m should be made to submit their design developments to several design reviews at specific agreed stages during the course of the various design stages.
9. D2 H Planning permission should never be granted on an outline basis only.
10. 3.2.1 TOO FREQUENT USE OF EXPRESSION " efficient use of land". Replace with "**a*ppropriate* use of land**"
11. 3.2.7 All Boroughs must engage with professional Design Review Panels. It is not acceptable that some Boroughs do not have this level of design scrutiny available (Westminster?). Decisions must be monitored.

User:	Kew Society

Policy D2 Delivering good design

There are good ideas in this policy but the policy is light on details of funding (who pays for the design reviews and the Mayor’s Design Advocates?).

User: Home Builders Federation

Policy D2: Delivering good design

The policy is unsound in places because it is unjustified and because it sometimes because it conflicts with national policy.

The HBF has a number of concerns relating to Policy D2 and D3. The effect of these policies will slow down the decision-making process in London. This will militate against the delivery of the housing that is required in large numbers from next year onwards.

Good design is important to ensure successful places. We are concerned, however, that this policy will result in widening the scope of schemes referable to the Mayor and the extent of the design scrutiny they will be subject to. There is, based upon the HBF's experience of referable planning applications in the period 2005-2010 a very considerable risk that planning applications will take significantly longer to agree and will involve greater expense. This is because a referable scheme will now involve several parties: the applicant; the planning and urban design officers of the local authority; the GLA's planners and design officers; those people involved in the local authority's design review; and then the GLA's design review panel.

Part F

We are concerned that the draft London Plan is encouraging more than one design review (Part F) in cases where development is at a higher density. This should bring far more residential and mixed use schemes within the ambit of the Mayor as a consequence of the drive to increase the overall density of development in London. We are not convinced that this will be effective in terms of the requirement of national planning policy, and the tests of soundness, to ensure that development needs are delivered. This is an untested area. It is very unclear how this process is going to affect development across London. In view of the major step change in housing delivery required, we consider that only one stage of Design Review should be required: that is the Design Review to be employed by the local authority. Part F should be amended to reflect this. If the local authority is satisfied, this should not be revisited by the Mayor.

Part F is also unsound in requiring Design Review “early in the planning process”. Local planning authorities cannot compel applicants to enter into pre-application discussions (NPPF, paragraph 189). These are voluntary arrangements. The Mayor cannot insist on pre-application engagement through the draft London Plan.

Part H 4)

The Mayor cannot insist that local planning authorities use architect retention clauses in legal agreements. Developers need to be free to appoint whomsoever they choose who they consider has the skills and expertise to help deliver the project. Developers may need to appoint different architectural practices for the planning and design and building stages as not all architects are equally competent in both stages. This policy would also be anti-competitive in fee terms, and where the ‘retained’ architect has not the capacity to devote to a project. In practice, there are very significant incentives to retain the same architect throughout, but this is not a planning issue. Moreover, it would be highly inappropriate to require that an architect not employed at either the planning or building stage, should then be appointed as a design reviewer. Although good design has some general principles, this is still largely a subjective area. There is consequently a risk that an architect who is aggrieved at failing to secure a contract, may find reasons to fault a project at the Design Review phase.

This clause should be deleted.

User: Regent's Park Conservation Areas Advisory Committees

D2 A7 We welcome this clause.

D2 D Design Codes General 1: we are concerned by the reference to Design Codes and their effectiveness. There must be concern that the NPPF's statement (36) that design codes should 'avoid overly prescriptive detail' may make them an inadequate mechanism for managing density (**D6)** in complex and sensitive heritage areas. See also policy **H2 B 2**.

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Our proposed revised text: 'design review recommendations are appropriately recorded and communicated to officers and decision makers, and made public for scrutiny in good time before officers' recommendations are prepared.'

Policy D3 Inclusive design

User:	Dr Walid Omeir

Hi

I would like to put this policy for counasltion with faith groups to know their needs.

Being a British muslim and an urban design counsltant,I would advice that a considrable wight of studies and counsltation should be given to help in inetgrating Mosques in the place making proccess of the urban form, and the benfite of this in term of health and wellebing plus increasing connectivty.

User:	Mr Peter Eversden MBE

Paragraph 3.3.4 should have additional words to require that there are no 'poor doors' in new developments containing affordable housing units and that, wherever possible, the design of entrances to each group of dwellings is similar and there is no visual difference for housing types.

User: Lift and Escalator Industry Association

The policy is clearly easiest to achieve in new developments and is supported by significant guidance e.g. in British Standards, Approved Documents to the Building Regulations etc. The improvement of existing buildings must be a priority. Many of these would have been built without evacuation lift provision or with provision which is unacceptable for a new building. Yet, as the buildings have aged, their use changed and their contents changed with modern materials, the fire risk to those buildings has generally increased. At the same time, those using and living within these buildings have aged and so the proportions of building populations needing evacuation lifts in the event of fire have generally increased. Consequently, there is an imperative to fit fire-protected evacuation lifts where existing lifts are not to current levels of protection.

User:	Lift and Escalator Industry Association

I strongly support and welcome the statement about emergency carry down or carry up devices. Other reasons supporting this statement are that use of these devices restricts stairway spaces for others (slowing their evacuation time and so increasing risks for all) and require significant resources to be committed for their safe use. Such devices are often specified as a short-sighted cost saving option without considering the risks to all from actually trying to use them in an emergency.

User: Arup

D3 – Inclusive Design
As per the fire section recommending that a qualified fire engineer is employed, similar to be suggested for a qualified access consultant to author the inclusive design statement? We too often see architects attempting to write these themselves, which are biased and sometimes inaccurate

- Including an indication of process for inclusive design might be useful for developers to realise the benefit of considering this earlier on in their projects.
  Where consultation with user groups should be undertaken could also be mentioned here – often we find that developers do this only if required.

User:	Mrs Holly Weir

Security measures can often inadvertently restrict the usage of spaces, leading to spaces that are no longer inclusive and that restrict the movement of users, particularly children who may then not be able to access a space without adult assistance. The following sentence should added to avoid this: *Security measures should not restrict children's independent mobility; children and young people should be free to access shared and communal spaces without adult assistance or supervision.*

User: Police Crime Prevention Initiatives Limited

Policy D3 Inclusive design

“A To deliver an inclusive environment and meet the needs of all Londoners, development proposals are required to achieve the highest standards of accessible and inclusive design, ensuring they:

1) can be entered and used safely, easily and with dignity by all

2) are convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment.”

On behalf of SBD, the Police DOCOs liaise with Occupational Health professionals to deliver inclusive environments.

B. “The Design and Access Statement, submitted as part of planning applications, should include an inclusive design statement.”

Early consultation regarding the Secured by Design scheme is imperative and it should be included in the inclusive design statement.

3.3.3 “Where security measures are required in the external environment, the design and positioning of these should not adversely impact access and inclusion.”

Secured by Design recommend that paragraph D3. B.3.3.3) includes reference to “consultation with Designing out Crime Officers at an early stage”.

3.3.4 “Entrances into buildings should be easily identifiable, and should allow everyone to use them independently without additional effort, separation or special treatment. High and low-level obstructions in buildings and in the public realm should be eliminated. The internal environment of developments should meet the highest standards in terms of access and inclusion, creating buildings which meet the needs of the existing and future population.”

In addition to above, Secured by Design recommend that paragraph D3. B.3.3.4) includes “that entrances to buildings should be well sited and lit, accessible from the street (where possible) and enjoy with plenty of natural surveillance”.

3.8.9 “Safety considerations must be central to the design and operation of tall buildings. Policy D10 Safety, security and resilience to emergency provides information on how to ensure the design of buildings follows best practice to minimise the threats from fire, flood, terrorism, and other hazards and Policy D11 Fire safety sets out specific requirements to address fire risk.”

In addition to above, Secured by Design recommend that paragraph D3. B.3.3.4) includes best practice to minimise the threats from ‘crime’ as well as fire, flood, terrorism and other hazards.

User:	Levitt Bernstein

We question whether this policy is needed at all as inclusive design it is one of the Good Growth Principles. However, to uphold this the principle Policy H2- G (small sites) should be rephrased to only consider a relaxation of Category 2 where apartments are concerned, and it is not possible to provide enough flats (we suggest 15) to make service charges viable. Cross-referencing, in this case to 3.5.6 would be useful here and elsewhere.

User: The Selby Trust

The Selby Trust is neutral about this policy. There is one key area where we would like the policy to be much clearer and to speak more articulately to inclusive design.

That is that where there are incumbent users on a development site that the policy requires that they be included in the design and development process. This could relate to a community facility, such as the Selby Trust or to residents of a housing estate which may be going through intensification or redevelopment. There are numerous circumstances where the act of engagement in the process would lead to more inclusive design.

Examples of how this inclusive design would then materialise through such engagement would vary from the macro eg these are our space requirements; these are our financial issues; how can development be mitigated so we are not harmed during the process; this is the type of housing we need to the more detailed eg our new community centre needs confidential one-to-one spaces, disability accessible spaces, community kitchen facilities, appropriate toilet and mother-&-baby changing facilities, noise protection and improving airflow.

User: London Forum of Amenity and Civic Societies

Paragraph 3.3.2 Line 2: after “lives,” add ‘by maintaining walkable neighbourhoods, so creating more inclusive communities.’

The London Plan should be promoting walkable neighbourhoods – yet Policy SD6 A (6) is the only reference in the whole plan!

Paragraph 3.3.2 has its last two sentences as a doublet - which is the version intended? The first is about trips out of the neighbourhood, whilst the second trips into the area. A rewrite could be:

“Links both to the wider neighbourhood and those into the neighbourhood for all pedestrians should be carefully considered,….”

Paragraph 3.3.4 should have additional words to require that there are no 'poor doors' in new developments containing affordable housing units and that, wherever possible, the design of entrances to each group of dwellings is similar and there is no visual difference for housing types. This requirement is in the current London Plan and has been applied. It should not be lost as a development requirement and may be needed in Policy D3.

Paragraph 3.3.7 requires “historical contextual considerations” to be explained or detailed in the Glossary.

User:	Trust for London

We welcome the commitment to dignity of all residents. Given the prominence of lift costs in discussions about viability, this should not be used as an excuse to deliver less affordable housing.

User:	King and Company Ltd
We fully support these objectives.	

User: Mrs Tatiana Telles Ferreira

3.3.5 Refuges, evacuation lifts enclosures with fire resistance/ emergency evacuation

"…the installations of lifts which can be used for evacuation purposes (accompanied by a management plan) provide a dignified and more independent solution. Elements of construction forming refuges, evacuation lift enclosures and lobbies should incorporate suitable levels of fire resistance."

Comment:

More stringent requirements in relation to Fire escape including disabled and older people access features is a common ground in the whole plan

3.3.7 Inclusive Design statement

Comment:

The Inclusive design statement is mandatory be included in the DAS

>

User: Mr Martin McConaghy

I wish lodge my support for policy D3 and policy D11. However, I also consider that the plan misses an important opportunity with regards to its guidance on policy D3. I believe the following guidance note to policy D11 is extremely helpful:

"Fire statements *should be submitted with all major development proposals. These should be produced by a third-party independent suitably-qualified assessor. This should be a qualified engineer with relevant experience in fire safety, such as a chartered engineer registered with the Engineering Council by the Institution of Fire Engineers. Planning departments should work with and be assisted by suitably qualified and experienced officers within borough building control departments and/or the London Fire Brigade, in the evaluation of these statements."*

My understanding of this is that it will encourage the use of qualified specialists both as part of the design team and the local authorities granting planning consent. This two fold approach of applying competent expertise is essential to hitting the 'highest standards' and is welcomed.

I note with some disappointment that policy D3, which requires the 'highest' standards of inclusive design does not go so far as to encourage the use of qualified specialists, either as part of the design team or within local authorities. This is a missed opportunity to ensure the expertise necessary to deliver the policy is in place.

It is widely accepted that delivery of inclusive environments needs specialist expertise both within the design team and within local authorities. The evidence gathered by the House of Commons Women and Equalities Committee, as set out in the report 'Building for Equality: Disability and the Built Environment", demonstrates the need for specialist with paragraph 77 and the Annexes from outreach sessions highlighting the issue.

The need for specialist has long been established with publications such as ‘Planning and Access for Disabled People’, by the ODPM, Planning, buildings, streets and disability equality, published by the former DRC both encouraging appointment of Access Officers within Local Authorities. Other publications such as the new BS8300, the now dated but still relevant ‘Inclusive Projects’ publication all make reference to the need for specialists. It is also clear from the government led projects that the wider industry is not currently capable of delivering the ‘highest’ standards without the support of specialists and hence the need for the recent Ministerial Action Plan on Inclusive Environments and the Built Environment Professional Education Project, both of which will take many years to have an impact on development proposals.

The existing SPG relevant to policy D3 recognises the need for specialists by making reference to the use of members of the National Register of Access Consultants (NRAC). The NRAC is the only body in the UK which accredits professionals with expertise in this area. It was established with central government backing to ensure that the public, developers and design teams had access to a register of suitably qualified competent professionals.

I would therefore ask that you add paragraph to the guidance on policy D3 to make it clear that the plan encourages local authorities and design teams to make use of suitably qualified specialists, such as members of the National Register of Access Consultants.

User: The Access Association

Policy D3 Inclusive Design

Whilst this policy is very welcome and will help to achieve Policy GG1; consideration needs to be given to the additional "steps" that the Equality Act 2010 requires Local Planning Authorities to take, or should require developers to take, to remove barriers in existing public environments. This might entail a whole range of interventions ranging from shopfront doorsteps at the interface of external and internal realms, to features like unguarded trip hazards, and absent kerbs and kerb crossings in public realm areas around the site of a development proposal

Given the added and welcome attention in the plan to means of escape, I suggest that the word ‘exited’ is added to A1) so that it reads: ‘can be entered, exited and used safely, easily and with dignity by all.

For the London Plan to deliver physical development that addresses shortcomings in public realm or other external environments that provide access to new building projects, London Plan policy ought to require access updating and barrier removal in the streets and spaces around new buildings and in the approaches to new, altered or extended buildings.

BS 8300-1:2018 Fig. 1 recommends that to identify disabling barriers inclusive design strategies for the external built environment should incorporate end-user feedback, tailored audits and also customer surveys to identify the barriers that development proposals should remove.

A2 could be altered to read:

A2a "are convenient and welcoming with disabling barriers removed, no new disabling barriers introduced, and which provide independent access without additional undue effort, separation or special treatment"

B encouragement of access statements is most welcome. Could the Mayor provide SPG on what information an access statement should contain. These statement should be written be suitably qualified and / or experienced people to ensure that they are of suitable quality.

Amend explanation in the first sentence of 3.2.1 to read:

"Despite recent progress in building a more accessible city, too many Londoners and visitors to London still experience barriers to living independent and dignified lives, due to the way the built environment has been designed and constructed or is managed, **or in the way that it has not yet been updated to remove the barriers that disable people**."

Paragraph 3.3.2

The last sentence in paragraph 3.3.2 has been repeated twice.

No mention is made of incorporating dropping off zones in public spaces as many disabled people are unable to use public transport, walking and cycling routes. Consideration should also be given to accommodating the use of electric mobility scooters in the design of public spaces as increasing numbers of older and disabled people use them as a way of maintaining their independence. Questions like: Can they be charged in public in the same way electric cars can be? Should scooters only be used on the pavement or can they use cycle lanes?

Paragraph 3.3.3

Should ensure that any security features do not make access for all difficult or impossible for wheelchair and scooter users and for those with visual impairments.

Amend explanation in the last sentence of 3.3.4 to read:

"The internal environment of developments should meet the highest standards in terms of access and inclusion, creating buildings which meet, or are updated to meet, the needs of the existing and future population."

Paragraph 3.3.5

The proposal to have evacuation lifts is an important improvement. However, other simple measures should also be reviewed like step-free exits to all buildings and the use of emergency lighting etc. All too often, it is the last few metres that are the barrier to access out of a building in an emergency.

Paragraph 3.3.7

The request for an “Inclusive Design Statement” as part of the design and access statement is a major step forward and would prevent the use of the phrase “the design will comply with the DDA/EA” as a response to details on disabled access to the scheme. They are only of any value however if they are written by a suitably qualified or experienced person and this needs to be added in a similar vein to fire assessments.

Table 3.1 Minimum Space Standards for new dwellings

There should be a note to set out that in meeting these minimum space standards it is not guaranteed that M4(2) and M4(3) requirements can be met. Pleasing that these space standards will apply to new building, change of use and conversions.

The Gross Internal Area (GIA) calculation includes partitions, structural elements, cupboards, ducts, flights of stairs and voids above stairs; these are not ‘usable spaces’ and can impact whether a space is accessible or not.

User:	Centre for Accessible Environments

A and B are welcomed.

Will detailed guidance be provided and referenced?

User:	Centre for Accessible Environments
Would suggest that those involved in design liaise with Design Out Crime Officers throughout period of design, build and post occupancy/management.	

User:	Centre for Accessible Environments

The request for fire evacuation lifts and management plans is welcomed and should be clarified that it also applies to housing development (to repeat in D5 Accessible Housing). It would also be beneficial to provide a cost comparison demonstrating minimal additional cost, in addition to the additional overarching benefits (including increased confidence for disabled residents).

User:	Centre for Accessible Environments

Planning applications should ensure that planning conditions are placed on each development which comply with, and clearly detail, relevant Building Regulations and the 2016 Minor Alterations to the London Plan i.e. ADM, Volume 1: Dwellings; Minimum 90% for M4(2) Category 2 and 10% for M4(3) Category 3 (possibly more for certain types of housing or developments) across all tenure, and ADM Volume 2 for other areas – as per Policy D5 Accessible Housing.

User:	Centre for Accessible Environments
How will this be implemented and by whom? Relevant qualified personnel should be involved.	

User:	Mr Liam Proudlock

The Accessible London SPG should be referenced, with a link, to make the best use of the inclusive design guidance of the London Plan that has been built up over the years.

User:	Diocese of Southwark

The Diocese of Southwark fully supports the concept of "inclusive design" to ensure that buildings are accessable to all, so building inclusive communities.

User:	Withernay Projects

D3B asks for an inclusive design statement, which is welcomed, but I see rather a lot of 'access statements' in Design and Access Statements produced by architects that in my view do not function as such. This especially happens when appointed to advise on a project *after* planning permission is awarded with a condition to provide an access statement, by which time is so many constraints are set that it is much more difficult to have a positive influence of the access and inclusion of a project. Therefore the inclusion of 'an access and inclusive design statement by an independent access consultant' or similar is recommended. (This would also be consistent with the London Plan wording about fire engineers producing Fire Statements).

User:	Central Acton Neighbourhood Forum

As currently worded, this policy promises far more than it can ever deliver. A much clearer commitment to genuinely inclusive design is required. Design can only be inclusive if it involves and takes account of the people who will be affected by a development. The growing trend in London over recent years has been to exclude communities from decisions that affect them, leaving decisions about fundamental changes in the hands of technocrats who are unfamiliar with a locality and as often as not less knowledgeable about a development than groups wanting to input into the decisions. A worrying democratic deficit is developing and it is leading to a growing dissatisfaction with the planning system.

User:	London Assembly Green Party Group

Supporting text 3.3.3 asks rightly that security considerations should not affect accessibility. These two issues can be successfully balanced when needed, and I would like to see this provision moved into the policy box itself.

Move into policy D3:

“3.3.3 Where security measures are required in the external environment, the design and positioning of these should not adversely impact access and inclusion.”

User:	McCarthy and Stone Retirement Lifestyles Ltd.

D3 (106) -Inclusive Design

Inclusive design is fundamental to improving the quality of life for disabled and older people in particular.

Use of an inclusive design statement (as part of the D&AS) is supported to demonstrate how proposals address particular needs.

We strongly support this policy to improve accessibility for older and disabled Londoners.

User: Butler & Young Approved Inspectors Limited

Policy D3 A1 and A3 will conflict with other legislation - Building Regulations and the Regulatory Reform (Fire Safety) Order.

Whilst I agree that designers need to consider such items early in the design process, Part M of the Building Regulations sets minimum standards for Access to and Use of Buildings, whilst both the Building Regulations and the Regulatory Reform (Fire Safety) Order set minimum standards for the evacuation of buildings.

Should the Planning Authority try to place conditions on a planning application in relation to these aspects , the conditions would surely fail the 6 tests under the NPPF as 1- Not Necessary (other legislation applies), 2- Not relevant to planning, 4- not enforceable as other legislation applies and 6 - not reasonable as other legislation applies

User: Butler & Young Approved Inspectors Limited

Paragraph 3.3.4 describes aspects of access to and use of buildings that are controlled under building regulations. Entrances and circulation inside buildings together with facilities that are suitable for use are all apsects that are controlled under building regulations.

Any conditions proposed by the planning authority in relation to these aspects would surely fail the 6 tests under the NPPF as 1- Not necessary as controlled under building regulations, 2 - not relevant to planning as controlled under building regulations, 4- not enforceable as controlled under building regulations and therefore 6- not reasonable

User:	Butler & Young Approved Inspectors Limited

Paragraph 3.3.5 describes aspects of evacuation of a building that are controlled under both Building Regulations and the Regulatory Reform (Fire Safety) Order

Any conditions proposed by the planning authority in relation to these aspects would surely fail the 6 tests under the NPPF as 1- Not necessary as controlled under building regulations, 2 - not relevant to planning as controlled under building regulations and the regulatory reform (fire safety) order, 4- not enforceable as controlled under building regulations and the regulatory reform (fire safety) order and therefore 6- not reasonable

User: National Register of Access Consultants

Whilst we are supportive of the Policy D3, we are concerned that previous versions of this Policy (7.2 of the current plan and 4B.5 of the 2004 Plan) have not been delivered in a consistent manner across the boroughs. Further less and less boroughs have access advisors / experts within their planning teams and as such LPAs are not able to enforce in an appropriate way. The current SPG serves as a clear guide on the process of delivering an inclusive environment as well as the need to engage access experts where appropriate and consult with local accessibility groups.

London's coherent approach with policy to date and the use of experts (as a result of the Accessible London SPG) has been held in high regard and seen a best practice model for delivery of inclusive environments through the planning system. This point was repeatedly raised during the House of Commons Women and Equalities Committee's Disability and the Built Environment Enquiry.

Under the new Policy D11 Fire Safety we note that the Policy requires an Independent Fire Statement produced by a third party suitably qualified assessor as a reflection of the complexity of the matter, Policy D11 is similar to D3 in that it expects the highest standards of fire safety where D3 expects the highest standards of inclusive design. D3 also requires an Inclusive Design Statement. For consistency we recommend that D3 also requires the Inclusive Design Statement to be produced by a suitably qualified assessor. The National Register of Access Consultants is the only UK wide accreditation body for access consultants and was developed with Central Government funding to ensure there was a register of competent professionals to advise on inclusive design and accessibility issues. We therefore request that the supporting text to the policy also makes reference to the NRAC in the same manner the supporting text to the D11 makes reference to the Institute of Fire Engineers.

User: Alliance for Childhood

Often there are barriers to the free movement of children which are not recognised. The use of fobs as keys to door between the interior and exterior of housing blocks is one of them as young children are generally not able to use them without adult supervision. We suggest adding the wording in bold:

D3 To deliver an inclusive environment and meet the needs of all Londoners, development proposals are required to achieve the highest standards of accessible and inclusive design, ensuring they:
A. 1. can be entered and used safely, easily and with dignity by all, **including avoiding the use of technology such as fobs which will prevent young children having free access between interior and exterior space without adult assistance or supervision.**

User:	Allies and Morrison
We support Policy D3: A (Point 3) and the related point which notes the requirement that, where lifts are provided they should be fire evacuation lifts.	

User:	David Bonnett Associates

Secure by Design. Some of the Secured by Design requirements are now in the Approved Documents. Where is this going to specified and where will guidance be that states what takes preference if Secure by Design requirements conflict with Access ones?

Safety. It is recommended to include reference to guidance on the benefits of providing public transport near developments, lighting, active streets and frontages, etc. They are important for vulnerable people when approaching their homes, especially in winter / in the dark.

User: Inclusive Design and Access Panel

- D3 – Support, Very encouraging to see this policy.
- In addition we think that an Access Consultant (with appropriate qualification, such as NRAC) should be employed by the developer and an access and inclusive design group or panel be set up of people expected to use the development, also to be funded by the developer, to review and feed in on the access of the design and through the build process of appropriate developments.
- A 3rd point is needed, we recommend this links to an updated version of Accessible London SPG or other suitable guidance. Until it is redrafted continued reliance should be made on the existing SPG.
- D3 – 3.3.2 – Support, in addition this needs to look at the external interchange, the interchange between external and internal, and the internal environment.
- D3 - 3.3.4 – Support, in addition this should be expanded or as an additional point to also cover way finding and visibility for the internal environment.
- D3 – 3.3.5 – Support, we very much welcome the helpful inclusion of Fire Evacuation Lifts for all abilities.
- D3 – 3.3.7 – Support, Very much welcome the additional guidance given, and in particular the final bullet point, “detail engagement with relevant user groups such as disabled or older people’s organisations”. We recommend for larger development that it is a requirement to engage with an access panel that is appropriately resourced and engage a professional (NRAC) access design expert.
- D3 – 3.3.8 – Support, but we recommend a full updating of the SPG to ensure that a range of issues, such as neurodiversity, are covered and included.

User:	Putney Society

3.3.6 (also 3.3.7 3.3.8) When dealing with historic buildings and heritage assets, careful consideration should be given to inclusive design, in conjunction with their heritage value, at an early stage. This is essential to securing successful schemes which will enable as many people as possible to access and enjoy the assets now and in the future, whilst retaining their heritage value. It should be kept in mind that some heritage assets can never be made fully accessible (eg for wheel chair users) without irrevocably damaging their unique values. In a few cases, inclusive design may not be advisable in the wider national interest.

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User:	Putney Society

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User:	HEAR Equality and Human Rights Network

Naviigable safe pedestrian routes are not just pedestrian traffic free routes, iif spaces are very wiide and open with features such as street furniture etc these can be more unsafe than standard pavements and streets

Tactiile paving iis vital and should be standard at all road crossings, steps etc; where possible iit should extend further across pavements to indicate the llocation of crossings, however it shoould not be too raised as otherwise people wiith mobility impairments may find iit a hazard

User:	HEAR Equality and Human Rights Network

Revolviing doors can be hazardous and should be avoided if possible

Whiilst entrances that can be used by everyone independently are to be welcomed thiis is not always possible as there are situatiions where different people with different impairments have diifferent needs, for example someone with a visual iimpairment cannot locate a press button to open a door which would be suitable for a wheel chair user, if there are different entrances provided they should be adjacent to each other and lead into exactly the same space once inside

Lifts should always be provided, irrespective of how many floors a buildiing has, and these should have spoken floor announcements

Alongside better physical accessibility in buildiings staff diirecting the publiic should have training about how to assist people with impairments or other mobiliity needs, for example not pointiing without use of words when a visually impaired person asks for diirections; the user led voluntary and community sector should be commissioned to provide suitable training in publiic buiildiings

User: Telegraph Hill Society

D3 Objection

The words “achieve the highest standards” should be replaced by “achieve high standards, taking into account the other policies within this plan”.

Whilst we are highly supportive of policy as regards larger new developments, the plan is also urging small scale developments. A small scale development in some areas, particularly if the plan were to apply to heritage areas, may not be able to conform with the “highest standards” whilst still meeting the other design criteria. For example, step free access may not be achievable on a single house infill site in a row of Victorian terraces without severely compromising the integrity of the appearance of the terrace.

“Highest standards”, whilst ideal, also set a hurdle which could be exceptionally expensive and which will add to the cost of property or even make a smaller development unviable. Meeting the “needs of all Londoners” does not mean that all properties need to meet the needs of every single individual Londoner. It should mean appropriate housing in the appropriate quantity in the appropriate places.

User: Home Builders Federation

We note the policy. The requirement that in all developments needing lifts one should be a fire evacuation lift suitable for disabled people is understandable. We note that the *London Plan Viability Assessment* has factored-in this cost (see paragraph 5.8.15). As most residential schemes will have to include this (because 10% of homes in all schemes must be wheelchair accessible, as required by Policy D5) and it will cost in the order of £20,000 per dwelling, this will be challenging for viability. This is especially the case in lower value areas on the basis of 35% and 50% affordable homes (see paragraph 14.2.4). This policy is unlikely to incentivise the construction of multi-storey blocks of apartments on small sites in the boroughs of outer London.

We understand the need to improve inclusivity, but as the Viability Report documents, we are not convinced that this objective can be achieved at the same time as all the other draft London Plan policy objectives, such as 50% affordable homes.

The Mayor will need to monitor how his design and construction policies together with his affordable housing targets are affecting the delivery of the housing targets. This is why it is important that the Housing Delivery Test is not adulterated by the Mayor, and that our recommendation that the Design Review process should be suspended in cases where local authorities have to produce an action plan to remedy past failure, should be incorporated in the draft London Plan.

User: Royal Borough of Kensington and Chelsea

3.3 Policy D3 Inclusive design

Further support for inclusive design is welcomed as officers in Development Management are frequently challenged on this matter when approaching agents for their failure to be inclusive, particularly when dealing with historic buildings.

The Council welcomes the requirement for fire evacuation lift as set out in criterion A (3) of the policy. The objective of the policy to ensure all building users are able to evacuate with dignity and by independent means is also welcomed. There is an existing building regulation requirement to provide a fire fighting lift in buildings with a floor above 18m. It would be useful to clarify in the policy and its supporting text if the fire evacuation lift will be in addition to the firefighting lift or whether there is just one. If there is only one the management measures between means of escape and firefighting will have to be clarified. A cross reference to Policy D11 Fire Safety should be made in terms of the requirement for applicants to submit a Fire Statement with major planning applications.

A reference to resisting gated developments should be included in the policy.

User: London Borough of Islington

Chapter

Design

Draft London Plan Policy

Policy D3 – Inclusive Design

Islington Response

We have the following detailed comments on policy D3:

- D3 (A) – Reference to ‘versatility to respond to changing needs over time’ and ‘ensuring that layouts are legible and logical’ should be added.
- D3 (A)3 - This is welcomed. It should be made clear that an evacuation lift is in addition to any proposed firefighting lift.
- D3 (B) - An inclusive design statement should bring together the design and management of the proposed development.
- 3.3.2 – Suggest rewording to ‘creating more inclusive, sustainable and diverse communities’ (in terms of age, ethnicity, ability, socio economic status, etc)
- 3.3.3 – Recommend natural surveillance and diverse usage to promote positive behaviour, rather than physical security measures to combat anti-social behaviour.
- 3.3.5 – This is the approach that Islington advocate in our Inclusive Design SPD, with particular success in relation to residential accommodation.
- 3.3.6 - We fully support this progressive approach to an inclusive historic environment.

User:	Association of Consultancy & Engineering

ACE is supportive of the Mayor’s policies to ensure London is an inclusive city for all. This means making it a pleasant place for its citizens to live, but it also means making it a welcoming destination for those who do not reside in the city. Excellence at the design stage can help to make the city more accommodating for foreign visitors who may have to overcome language or cultural barriers whilst in London. Similarly, people from other parts of the United Kingdom, who are not familiar with the city, can benefit from inclusive design to help their navigation of the public realm. Design of public space that is easy to navigate and helps to channel users towards their destination can help improve accessibility, as well as potentially reducing congestion around London’s busiest areas.

User:	Simon Saville

I broadly welcome policies D1 to D6 that seek to improve the design and land use efficiency of new housing.

User: City of London Corporation

The City Corporation strongly supports the requirement for inclusive design across all development in London. However, the concept of “Inclusive City” also covers economic and social inclusivity. This policy ought to ensure that the design of developments is as inclusive as possible (e.g. social housing entrance at the rear adjoining the bin store whereas the market housing entrance is on the principal façade; parity of access to the roof level free public viewing gallery when compared with a high-end restaurant at roof level; ensuring that the design is inclusive to all members of the community including children, families and the elderly). These key issues and the wider definition contained in paragraph 3.3.1 should be included in the main Policy text not just in the explanatory text.

The requirement for at least 1 fire evacuation lift suitable for use by those requiring level access from the building goes beyond the responsibilities and powers of the local planning authority and is a matter that will be dealt with through building control (either local authority or approved inspectors). The local planning authority can encourage the provision of such facilities, and can encourage the submission of information demonstrating how fire safety issues will be addressed within a development, but cannot determine an application on the basis of whether a proposal meets or does not meet building regulations, or enforce the provision of equipment/designs required by building regulations. Policy D3 should continue to encourage the provision of information to demonstrate how the development will provide level access via fire evacuation lifts and encourage liaison between local planning authorities and building regulations, but it cannot require it.

User:	Janet Sacks

A clearer commitment to genuinely inclusive design is needed. It can only be inclusive if the people who will be affected are taken into account, but over the past years the trend has been to exclude communities from decisions that affect them and this is leading to dissatisfaction with the planning system.

User:	London Borough of Barnet

We support recognition that inclusive design is critical to health, independence, and social wellbeing across the lifespan. The social model of disability is already adopted within Barnet. Additionally, Barnet's Green Infrastructure SPD recognises the importance of the World Health Organisation's, "Age-friendly cities checklist". As the population of London changes, it will be critical that communities embody elements of age-friendly design, and we recommend that these elements are considered within pan-London work. The need to provide additional reassurance post Grenfell Tower is understandable but there needs to be clarity on what the role of planning is and what is covered by other legislation such as building regulations. Some of these elements, in association with policy D10 Safety, Security and Resilience to Emergency, currently unacceptably blur lines and increase expectations on planning.

User:	London Fire and Emergency Planning Authority

18. Under D3, inclusive design (p106) while LFEPA recognises and welcomes the inclusion of this section on inclusive design, the London Plan could be further strengthened by setting out the importance of ensuring that inclusive design is dealt with in parallel with the evacuation strategy, which is an intrinsic part of inclusive design in itself.

User: Wheels for Wellbeing

3.1 We support the idea that Development Plans should encourage and facilitate inclusive cycling routes and cycle parking. Connectivity is particularly important for disabled cyclists who, in order to complete a full journey, require step-free, door-to-door routes that are reliably and consistently accessible (which includes fully accessible, integrated modes of transport).

3.2 We support the Mayor's ambition for all developments to be inclusive of disabled people. However, it is currently the case that the needs of disabled cyclists are rarely catered for when it comes to the built environment. Therefore, in order to address this problem we recommend that planning authorities, architects and developers are urged to consider the following key points:

- Where new cycle parking facilities are installed, 5% of all spaces are allocated for use by disabled cyclists - matching equivalent provision for disabled car drivers;
- Where accessible car parking spaces are built, the co-location of inclusive cycle parking is also considered;
- When new offices, leisure and commercial spaces are built it is ensured that they accommodate inclusive cycle routes, inclusive cycle parking and accessible showering facilities;
- For local disability groups, including disabled cyclists, to be consulted during the preliminary stages of any new building development.

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- For local disability groups, including disabled cyclists, to be consulted during the preliminary stages of any new building development.

User:	London Borough of Barnet

Following the Grenfell Tower disaster and terrorism attacks in London in recent years the changes made reflected through this suite of DLP policies are understandable and generally supported. Public realm design needs to take account of / be resilient to terrorism. The Council and Barnet Homes take fire safety extremely seriously; there are already extensive measures in place to ensure that our homes comply with fire safety regulations. All our high-rise blocks have fully up to date Fire Risk Assessments in place. A further review of fire safety measures in our high-rise blocks was carried out to identify any measures that are required to move beyond legislative compliance to deliver best practice in fire safety including the consideration of sprinkler systems, improved fire and smoke alarm systems and other measures. We would however question whether requiring a Fire Statement for major development is potentially straying into non-planning matters. Undertaking robust assessment of such statements could prove challenging for many boroughs. The London Plan will need to reflect the conclusions and Government response to the Independent Review of Building Regulations and Fire Safety expected from Spring 2018.

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- For local disability groups, including disabled cyclists, to be consulted during the preliminary stages of any new building development.

User: Central Ealing Residents' Association

Policy D3 talks about accessible and inclusive design, which we support, but what does this mean in practice? An inclusive design statement in the Design and Access Statement accompanying a planning application is too late in the process and means developers will pay lip service to the need to properly involve the local community and take account of the views of people affected by development. A genuinely inclusive design must mean local people being actively involved throughout the planning process, with their views being taken into account.

User:	London Borough of Lambeth

Lambeth strongly supports this policy, including the requirement to achieve the highest standards of accessible and inclusive design and the requirement that Design and Access Statements, submitted as part of planning applications, should include an inclusive design statement. The proposal for further guidance on inclusive design from the Mayor is also welcome.

User:	London Tenants Federation

3.3.1 Policy D3 Inclusive design

We propose:

Section A3 should be tempered with a number of issues that effect the use of lifts

- potential exposure to smoke, gases or other harmful substances while waiting for a lift

- lift and escalator availability, reliability and failure modes

- human factors, such as exit choice behaviour, particularly where phased evacuation strategies are adopted

User:	London Borough of Haringey
The Council supports this policy.	

User:	London Cycling Campaign

Add:

consider the needs of people who use adapted cycles (those used by people with disabilities)

User:	London Borough of Hounslow
LB Hounslow supports this policy	

User: London Borough of Lewisham

D3 introduces new concepts such as providing independent access without additional undue effort, separation or special treatment.

This seems to imply lifts or ramps that provide step-free access without integrating properly with architectural or landscape design can be resisted.

Further consideration should also be given to:

- Whether D3 is reasonable in all instances, e.g. a first floor flat conversion accessed by stairs.
- Whether a threshold should be applied to the scale or type of development.

The ability to refuse development where the step free access is not integrated into the building and landscape design.

User:	London Borough of Brent

The principle of inclusive design is supported. The need to provide additional reassurance post Grenfell Tower is understandable, particularly as it is likely that the plan will essentially require taller buildings to meet development capacity needs. There however needs to be clarity on what the role of planning is and what is covered by other legislation, e.g. building regulations. Some of these elements, in association with policy D10 Safety, Security and Resilience to Emergency, currently unacceptably blur lines and increase expectations on planning. This risks causing the potential for delay to or judicial review of decision making which might stray into other areas that are subject to other legislation outside planning. The London Plan will need to reflect the conclusions and Government response to the Independent Review of Building Regulations and Fire Safety expected from Spring 2018.

User:	London Borough of Bromley
The policy is broadly supported.	

User:	London Councils

London Councils is supportive of this policy. The focus on fire safety is particularly welcome as this is of paramount important to boroughs. Ensuring that an inclusive design statement is submitted as part of a planning application should facilitate the successful assessment of a development.

User:	London Borough of Tower Hamlets

We are broadly supportive of this policy as it should enable officers to better negotiate internal improvements which ensure developments are fully accessible. As a general comment the supporting text is far longer than previous and less concise, but easier to navigate due to bold text and bullet points. Paragraph 3.3.2 (the second sentence) contains an expanded repetition of the previous sentence.

User:	Royal Borough of Kingston
Support.	

User:	London Borough of Hillingdon

The principle of inclusive design is supported, however the policy requires the following amendments:

• Criterion A, part 3 should be amended to:

‘In developments where lifts are installed, including within blocks of flats, as a minimum at least one lift per core (or more subject to capacity assessments) should be a fire evacuation lift suitable to be used to evacuate people who require level step free emergency egress from the building. Carry-down mechanical or similar interventions that rely on manual handling are not acceptable’

User: Hammersmith and Fulham Disability Forum

25. Policy D3 Inclusive Design.
We welcome this policy. We recommend the New London Plan ensures that developers, planning authorities and building control bodies embed Policy D3 Inclusive Design properly throughout the development process and not make basic errors that should have been avoided. We need everyone to follow consistently specific principles and policies underpinning Policy D3 to achieve inclusive developments and environments. Who has the authority to monitor this to ensure inclusive design is achieved?

User:	Habinteg

We support the Draft New London Plan’s commitment to inclusive design, which aims to ensure that a variety of needs are included in design and development from the offset.

User:	Habinteg
We are pleased that **section 3.3.1** acknowledges that “inclusive design is fundamental to improving the quality of life for disabled and older people in particular”, as this understanding is integral to ensuring that policies are designed with older and disabled people in mind.	

User: Habinteg

This aligns with the Lifetime Neighbourhoods principles, which combine civic and social processes with physical conditions to achieve the following outcomes:

- An environment that is accessible and inclusive, aesthetically pleasing and safe (in terms of both traffic and crime)
- A community that offers plenty of services, facilities and open space
- A strong social and civic fabric, including volunteering and informal networks
- A culture of consultation and user empowerment amongst decision makers
- A strong local identity and sense of place

We would like to see a stronger commitment to, and more detailed specification of, Lifetime Neighbourhoods in the Draft New London Plan. This could include more attention to the positive and holistic outcomes which can result from joined-up approaches to housing and communities. To release the full potential that accessible housing holds for disabled people it is crucially important to integrate accessibility and inclusion into social and commercial infrastructure, as well transport, ensuring services provide for a range of requirements.

User:	London Borough of Hackney

Hackney supports this policy in principle, although there should be clarification about heights as it may exceed the requirements of the Building Regulations.

Planning teams may find difficulties when developers use Fire Engineers and / or Approved Inspectors to say that evacuation lifts are unnecessary in some buildings as there will be a fire management plan to deal with such an evacuation.

User:	Westminster City Council

The sentiment of this draft policy is supported. However, both the policy and paragraph 3.3.7 largely cover building control rather than planning matters. It is unhelpful and potentially counterproductive to seek to blur the distinction between the different enforcement regimes in this way.

User: InLinkUK

London should seek to be be accessible for all users of all abilities, with this being especially important as densities and reliance of digital technologies increase over time. For example, if a new building is likely to disrupt local mobile signals or locations services, they should be expected to take this into consideration. Accessibility in to buildings is also essential to support London and the people visiting and living here.

Since inception InLinks have been fully-accessible in the design and features; we believe it should be the same for all new development projects and, where possible, all redevelopment projects as well.

Recommendation #12

? That Policy D3 be updated to ensure development proposals consider their impact on digital infrastructure and services.

User:	London Borough of Southwark

The council supports policy aimed at improving the accessibility of buildings and creating a more inclusive environment. The requirement of at least one lift per core that is suitable to evacuate visitors/residents in case of an emergency is particularly welcome.

Policy D3 prescribes that the internal environment of developments should meet the highest standards in terms of access and inclusion. Officers recommend an additional requirement that all communal areas of a residential development (entrances, hall, landings and roof gardens etc.) be tenure blind with equal access.

User:	London Borough of Redbridge

The Council welcomes section A which seeks development that attains the highest standard of accessibility ensuring independent access and dignified emergency evacuation for all users. In addition, we strongly support the policy requiring the provision of a fire evacuation lift suitable to evacuate people who require level access. The policy could be strengthened by requiring details of engagement with stakeholders (including disability organisations) on large developments. The Council is also pleased to see that the Mayor will assist boroughs in implementing inclusive design measures.

User:	London Borough of Enfield

Policy D3 looks at delivering an inclusive environment through design. The proposal to have an inclusive design statement is supported but further guidance on the scope for this would be useful in order to ensure consistency and aid compliance.

User:	London Borough of Wandsworth

Policy D3 is welcomed however part B should include reference to access from the street to the building and where masterplans are used to deliver schemes the wider inclusive environment is considered.

User:	London Borough of Richmond Upon Thames

Support continued cross cutting approach to inclusive design. Pick up references to emergency evacuation under Policy D11).

User:	London Borough of Harrow

The Council supports this policy. However, there needs to be clarity on what the role of planning is and what is covered by other legislation, e.g. building regulations. Some of these elements, in association with policy D10 Safety, Security and Resilience to Emergency, currently unacceptably blur lines and increase expectations on planning which cannot be met as there is limited or no legal basis. This risk causing the potential for delay to or judicial review of decision making which might stray into other areas that are subject to other legislation outside planning. The London Plan will need to reflect the conclusions and Government response to the Independent Review of Building Regulations and Fire Safety expected from Spring 2018.

User:	London Borough of Havering

Paragraph 3.3.5

This is a very positive statement around emergency evacuation linked to the DDA.

User:	London Borough of Havering

Paragraph 3.3.5.

This is a very positive statement around emergency evacuation linked to the DDA.

Paragraph 3.10.1

Reference should be made to all London Boroughs having a Borough Risk Register

User:	Royal Borough of Greenwich

Support this policy, which provides additional clarity in terms of how development proposals should achieve inclusive design (as compared to the current London Plan policy).

User: London Young Labour

Density and Design

London Young Labour members believe that everyone in London has the right to housing which is not only affordable but is of high quality and a decent place to live. We therefore welcome the commitment in paragraph 3.3.1 to an inclusive design approach, particularly with reference to access for disabled Londoners and the commitment to high-quality design for all Londoners.

A practice we find particularly appalling is the proliferation of ‘poor doors’ – developments where the entrance for affordable housing is kept separate and out of sight from the entrance for more expensive housing – which is an unacceptable practice and highlights some of the worst excesses of housing approved under the previous Mayor. We therefore particularly welcome paragraph 3.3.4 which states that: ‘Entrances into building should be easily identifiable, and should allow everyone to use them independently without additional effort, separation or special treatment’.

User: Aspire

Inclusive Design

Aspire very much welcomes the proposals set out in Policy D3.

We note and welcome the inclusion of a requirement for an Inclusive Design statement to be submitted as part of the design and access statement. It would be further welcomed if it were possible to set out how local authorities should enforce this. Experience of the operation of the duty to submit access statements introduced by the 2004 Planning and Compulsory Purchase Act, revealed the need for a corresponding duty on local planning authorities to give due regard to access and inclusion of disabled people. The absence of such a duty resulted in the submission of design and access statements becoming largely perceived as a paper exercise, for which local authorities often lacked the capacity and/or expertise to assess and enforce effectively. We would therefore recommend that the GLA introduces measures and additional resources where necessary, to empower local authorities to refuse planning consent where Inclusive Design statements are unsatisfactory or non-existent.

User: London Borough of Newham

The LBN generally support this policy and it is considered to be complementary to Newham's Draft Revised Local Plan. It is useful to push concepts such as parity of user dignity, non-separation of entrances etc at the Pan-London level.

Policy D3, Part A(3) relates to emergency evacuations from buildings. Discussions with LBN's Building Control section found that there are a number of factors which determine when a fire evacuation lift is used and what the fire strategy should be. If a general lift is used in a core it is not normally regarded as an evacuation lift, this is due to other life safety features being required so the lift can become an evacuation lift. This policy therefore needs to be amended so that it is in accordance with building regulations.

User:	John Innes Society
D3 We support these policies.	

User: London Borough of Bexley

Policy D3 Inclusive design is based on existing London Plan Policy 7.2 An inclusive environment. The draft policy reiterates the requirements of inclusive design with a continuing emphasis on ensuring that development proposals enable access for all in an independent manner. Notably, ensuring dignified evacuation is now an additional inclusive design requirement, focusing on the installation of lifts that can be used safely for evacuation purposes. Whilst the right for everyone to be able to enter and exit all buildings safely and with dignity is supported, the ambition to create inclusive developments is sufficiently addressed in **Policy D1(A)**.

Part B of **Policy D3** sets a new requirement to include an inclusive design statement as part of the Design and Access Statement submitted with planning applications. Currently, a Design and Access Statement is one of the national requirements that is required as a submission with some planning applications. It is not required for householder applications, unless the site is within a conservation area or a Site of Special Scientific Interest. The requirement is broad to ensure that unnecessary information is not provided. By contrast, **Paragraph 3.3.7** sets out six specific elements that should be addressed in this inclusive design statement. The level of detail required is high and may not be proportionate to the scale and complexity of the application. This may represent an inappropriate new requirement for developers and as such, conflict with the government's ambition to streamline information requirements for planning applications.

User: Just Space

D3 Inclusive design

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

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

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

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

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

User: Inclusion London

Policy D3 Inclusive design

We welcome the Mayor's commitment to Inclusive design and recognition that barriers to Disabled people's independent living are created in the built environment when inclusivity is not build into the design.

Lighting and design features

All impairments should be included in inclusive design not just wheelchair users. Below are access measures recommended for people with sensory impairments, rare syndromes or neurodiversity, which are often overlooked:

- Good even lighting is needed in stair wells, external corridors and the surrounding environment.
- Edges of stairs need to be highlighted in white or light paint.

- Avoid large areas of glass (e.g. large glass windows) particularly at ground level because they cannot be easily seen partially sighted people and also dazzle people.
- Use muted pastel colour throughout building complexes - avoid bright, white dazzling gloss paint.
- Use colour contrast to highlight doors and to differentiate between walls and floors.
- Avoid intricate patterns as part of the decor.

Recommendation: the needs of people with sensory impairments, rare syndromes or neurodiversity are included in the design and décor of new build.

User: Inclusion London

3.3.5 Buildings should be designed and built to accommodate robust emergency evacuation

The emergency evacuation and safety measures for Deaf and Disabled people in all buildings, but especially in tall building need to be improved as the tragedy of the Grenfell tower fire highlights.

User: Mr Liam Kelly

Policy D3 Inclusive design

The Lifetime neighbourhood's policy should be included in the London Plan. Developments should maximise the opportunity for community diversity, inclusion and cohesion and meet the needs of community at all stages of people's lives.

D A 3 (p 106) " ..designed to incorporate safe and dignified emergency evacuation for all building users. In developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a fire evacuation lift suitable to be used to evacuate people who require level access from the building." should be tempered with a number of issues that prevent the effective use of lifts including:

- potential exposure to smoke, gases or other harmful substances while waiting for a lift
- lift and escalator availability, reliability and failure modes
- human factors, such as exit choice behaviour, particularly where phased evacuation strategies are adopted

User:	London Borough of Ealing

The Council supports this policy, in particular, the requirement that in developments where lifts are installed, a minimum of one lift per core should be installed that is suitable for fire evacuation for people requiring level access from the building.

User:	Ealing Matters

As worded, this policy promises far more than it seems able to deliver. A much clearer commitment to genuinely inclusive design is required. Design can only be inclusive if it involves and takes account of the views of people who will be affected by a development. The growing trend in London over recent years has been to exclude communities from decisions that affect them, leaving decisions about fundamental changes in the hands of technocrats who are unfamiliar with a locality and as often as not less knowledgeable about a development than groups wanting to input into the decisions. A worrying democratic deficit is developing and it is leading to a growing dissatisfaction with the planning system.

User:	London Healthier Places

The LHP Network supports this policy which will improve the accessibility of buildings, creating a more inclusive environment and welcome the requirement of an Inclusive Design Statement as part of the Design and Access Statement.

User:	Revo

We fully support the Mayor’s proposed policy for encouraging inclusive design across London’s built environment. Ensuring that new retail, homes, and other property types meet the needs of all is critical ensuring that growth is delivered equitably and sustainably. We have already released an Accessible Places Toolkit and work closely with the Government’s Disability Sector champions to expand and reach our ambitions and build stronger communities.

User: London NHS Clinical Commissioning Group

Policy D3 Inclusive design

Paragraph 3.3.1 acknowledges that inclusive design is fundamental to improving the quality of life for disabled and older people, and paragraph 3.3.2 refers to the need to create spaces and places where people can lead more interconnected lives, avoiding social isolation. With an ageing population and increasing number of people living with dementia, neighbourhoods need to carefully designed. Paragraph 3.3.7 refers to inclusive design principles which should be discussed with boroughs in advance of a planning application being submitted. It would be helpful if these principles were included in the plan or in revised supplementary guidance (current guidance on accessible environment is dated October 2014). Barking Riverside, as one of ten NHS England Healthy New Towns, is applying the latest learning on ‘age-friendly’ environments and public spaces to ensure that the new neighbourhood is inclusive.

User:	British Property Federation

We fully support the Mayor’s proposed policy for encouraging inclusive design across London’s built environment. Ensuring that new homes, offices, and other property types meet the needs of all Londoners is a crucial element in future-proofing development and ensuring that growth is delivered sustainably.

User: B.H. Pankhurst

D3 Inclusive design

Design can only be inclusive if it takes into account the wishes of the future residents and those forming a part of the local community. At present while ‘consultation’ may take place in this Borough the wishes of the community are ignored.

User:	Living Streets
We support policy D3, the Inclusive Design policy.	

User:	Historic England

Historic England supports the promotion of easy access to historic buildings so that that as many people as possible can enjoy these assets. We welcome the references in paras 3.3.6 and 3.3.7 to consideration of heritage value in promoting access.

User:	London Property Alliance
Detailed design matters, such as evacuation procedures, lift provision, etc., are more appropriately addressed through Building Control and, where necessary, within local design policies.	

User:	Bishopsgate Goods Yard Regeneration Limited

Our client supports the draft London Plan policy for encouraging inclusive design across new developments which ensures that development meets the needs of the community.

User:	London Borough of Sutton

OBSERVATION. The London Borough of Sutton broadly supports the approach to inclusive design. Whilst the council commends raising the awareness of developers and decision makers to matters concerning fire safety, Policy D3 should not duplicate other regulation.

User:	Persimmon Homes

Object as these measures, together with others, threaten the deliverability of the plan

As highlighted within the HBF representations, there will be a significant additional cost to undertaking these measures. We are not convinced that this objective can be achieved at the same time as all the other draft London Plan policy objectives, including 50% affordable homes and zero-carbon.

User:	Barnet Society

Para 3.3.8

The reference to BS 8300 as guidance on inclusive design should specify the latest version, 2018. Earlier versions focus mainly on physical difficulties; the latest version is a significant advance in recognising sensory impairment, neurodiversity and mental health as salient factors.

User:	Alzheimer's Society

1. It is encouraging to see the principles for Inclusive Design set out so clearly in Policy **D3.** We would urge that the policy should explicitly talk about being inclusive for people with cognitive impairment as this covers a set of discreet concerns that can get lost in the more obvious adaptations made for other at risk groups, such as ramps or wheelchair lifts.

User:	Alzheimer's Society

1. Paragraph **3.3.4** goes some way towards addressing these concerns by ensuring that entrances into buildings are easily identifiable and that is very important for people with dementia.

User:	Alzheimer's Society

1. We are keen to ensure that the engagement, detailed in paragraph **3.3.7** with relevant user groups is meaningful, but we would encourage developers, especially those engaged in large scale operations, to not just engage with representative bodies, but engage in facilitated discussions with people affected by dementia themselves.

User: Metropolitan Police Service

Policy D3 Inclusive design
A To deliver an inclusive environment and meet the needs of all Londoners, development proposals are required to achieve the highest standards of accessible and inclusive design, ensuring they:
1) can be entered and used safely, easily and with dignity by all
2) are convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment MPS DOCOs liaise with Occupational Health professionals to deliver inclusive secure environments.
B The Design and Access Statement, submitted as part of planning applications, should include an inclusive design statement.
The MPS support this; early consultation with the Secured by Design process can be included in a Design and Access statement
3.3.3 Where security measures are required in the external environment, the design and positioning of these should not adversely impact access and inclusion.
The MPS ask this be amended to: “Where security measures are required in the external environment, the design and positioning of these should not adversely impact access and inclusion. To achieve this, consultation with Designing Out Crime Officers is necessary at an early stage.”
3.3.4 Entrances into buildings should be easily identifiable, and should allow everyone to use them independently without additional effort, separation or special treatment. High and low level obstructions in buildings and in the public realm should be eliminated. The internal environment of developments should meet the highest standards in terms of access and inclusion, creating buildings which meet the needs of the existing and future population.
The MPS ask this be amended to “Entrances into buildings should be well sited and lit, accessible from the street (where possible), enjoy plenty of natural surveillance and should allow everyone to use them independently without additional effort, separation or special treatment. High and low level obstructions in buildings and in the public realm should be eliminated. The internal environment of developments should meet the highest standards in terms of access and inclusion, creating buildings which meet the needs of the existing and future population.”
3.8.9 Safety considerations must be central to the design and operation of tall buildings. Policy D10 Safety, security and resilience to emergency provides information on how to ensure the design of buildings follows best practice to minimise the threats from fire, flood, terrorism, and other hazards and Policy D11 Fire safety sets out specific requirements to address fire risk.
The MPS ask this be amended to “Safety considerations must be central to the design and operation of tall buildings. Policy D10 Safety, security and resilience to emergency provides information on how to ensure the design of buildings follows best practice to minimise the threats from fire, flood, terrorism, crime and other hazards and Policy D11 Fire safety sets out specific requirements to address fire risk.”

This includes a specific reference to crime as a hazard that can be minimised.

User: Footwork Architects Limited

- Each borough to prepare a Demographic Profile, forming the basis of the *Local Plan* and *Development Plan.* This be inserted at Policy D2 A, as a formal component of the proposed ‘evidence gathering and evaluation’
- Demographic Profiles to be considered, against agreed benchmarks, as a pre-requisite for designating *Opportunity Areas*, *Local Areas for Regeneration* and *Strategic Areas of Regeneration*
- Require *Design and Access Statements* for all development proposals to detail measures to create or improve integration, referencing the demographic profile of the area
- Integration to be addressed as a standard part of *RIBA Plan of Work Stage 0*
- Novation to be required on socially complex projects, to ensure the design teams continued scrutiny
- Pre-application and planning processes to ensure that measures to address integration and inclusion (such as tenure mix, proportion of social rent and affordable homes) are non-negotiable
- Limit the use of ‘exceptional circumstances’, by restricting it to a percentage of applications
- D*esign Review Panels* (and the *Mayor’s Design Advocates*) to have a specific responsibility to address social inclusion and integration, against agreed criteria; also to be included in the *Mayor’s Guidance on Design Review*
- GG1 (Building Strong and Inclusive Communities), is only outlined as generalities, or aspirations. This should be adjusted in light of the above
- D3 (Inclusive Design) must be broadened to include social inclusion as well as spatial/physical inclusion

User: CIBSE

We support the intent to design inclusive environments, but cannot comment in detail as it is not our core area of expertise. However, the ability of those who depend on lifts or other assistance to move within buildings to fully enjoy equal access is dependent not just on provision of assistance, but on it working and being maintained so that it works when they need it. Too often design for access is driven by the minimum to meet standards or guidance relating to construction, without adequate consideration of maintenance and operational performance and delivering a genuinely inclusive user experience. Too much emphasis on controlling build costs at the expense of the whole life performance may mean that lifts, for example, are frequently unavailable. We would encourage the Mayor to consider more explicit focus on maintenance and effective availability of access systems.

On fire safety, see responses to policy D11.

User:	Sustrans
D3 A 2 – Growth Locations in the wider south-east and beyond	Support the Inclusive Design policy and note the increasing role of, and therefore, the need to design for, non-standard cycles in providing inclusive mobility, as highlighted in paragraph 3.3.1

User:	Sustrans
Welcome the instruction against high and low-level obstructions in the public realm.	

User: Design Council

Inclusive Environments

38. Creating inclusive environments is central to Design Council work. The built environment can contribute to a more equal, inclusive and cohesive society if the places where we live, the facilities we use and our neighbourhoods and meeting places are designed to be accessible and inclusive.

39. Inclusive places are those where people feel proud to live, businesses choose to invest and the public want to visit. However physical, social, cultural and economic inequalities are still being literally built into new places, with evidence showing that inclusive principles are not being adopted and implemented consistently.[3]

40. We therefore welcome the requirement for the design of inclusive places set out in Policy D1, connecting firstly to the Mayor ambition to build a city where all Londoner's reap the rewards of the city. An inclusive environment is vital to achieving this. It is an environment where everyone can access and live safely, easily and with dignity by all. The diverse needs of the population should be accommodated by mainstream design. People should not have to experience segregation or separate, special treatment due to the design of the environment.

41. Inclusive design is the responsibility of everyone who works in the built environment: planners, those who commission new buildings and places, access consultants, designers, architects, engineers, surveyors, property owners and facilities managers. Our Inclusive Environments CPD training programme will encourage the UK's highly skilled professionals to continue leading the way in building the most accessible and inclusive country in the world.

[3] Design Council CABE (2008), Inclusive by Design, {online}

User:	Hornsey & Wood Green Labour Party
We support the move to the highest standards of accessibility and safe pedestrian routes linking communities.	

User: dp9

Policy D3 – Inclusive design

Some of the guidance contained within this policy and its supporting text replicates matters that are more properly covered by Building Regulations. This includes references to ‘robust emergency evacuation procedures’ at paragraph 3.3.5.

RECOMMENDATION: Amend the policy and its supporting text to avoid duplication with Building Regulation requirements.

User:	Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living

D3 (106) -Inclusive Design

Inclusive design is fundamental to improving the quality of life for disabled and older people in particular.

Use of an inclusive design statement (as part of the D&AS) is supported to demonstrate how proposals address particular needs.

We strongly support this policy to improve accessibility for older and disabled Londoners.

User:	Urbanissta

Policy D3 Inclusive Design

Inclusive design promoted – DAS should include inclusive design statement

Comment: No clarification given as to what the threshold is for inclusive design.

User:	London Borough of Camden
We support the objectives of this policy to secure the highest standards of accessible and inclusive design.	

User:	Battersea Project Land Company Limited

Policy D3 – Inclusive design

Some of the guidance contained within this policy and its supporting text replicates matters that are more properly covered by Building Regulations. This includes references to ‘robust emergency evacuation procedures’ at paragraph 3.3.5.

RECOMMENDATION: Amend the policy and its supporting text to avoid duplication with Building Regulation requirements.

User: Age UK London - a charity working with older Londoners

POLICY D3: INCLUSIVE DESIGN

PROPOSED POLICY AMENDMENT:
AGE AND DISABILITY FRIENDLY DESIGN should be mentioned, plus the issue of ‘INSPIRATIONAL DESIGN’.
Page8

Add to the front of the policy:
TO DELIVER AN INCLUSIVE AND SOCIALLY COHESIVE ENVIRONMENT THAT ADDRESSES SOCIAL ISOLATION AND INTERGENERATIONAL INEQUALITIES BY INSPIRATIONAL DESIGN AND VIBRANT PLACEMAKING. ALL DEVELOPMENT PROPOSALS WILL BE REQUIRED TO ACHIEVE THE HIGHEST STANDARDS OF ACCESSIBLE, INCLUSIVE AND USER-FRIENDLY DESIGN, ENSURING THEY: (rest of policy as is).

CHANGE the name of the policy to: POLICY D3: INCLUSIVE ‘& INSPIRATIONAL’ DESIGN.

User:	Age UK London - a charity working with older Londoners

24. D3 LINK TO POLICY CHANGE We would like to see ‘Inclusive design’ renamed as ‘Inclusive and Inspirational design’. The new London Plan should not become a charter for mass building that does not take account of the Mayor’s desire for locally appropriate solutions. We consider the use of the word ‘inspirational’ lifts design concepts out of the danger of being mundane and pedestrian to those that could create joy. This is necessary because clever design is required to offset effects of increased densification, and pleasure in the built environment will encourage, rather than discourage, people to go out from their homes into the public realm. This in turn will help to realise the Good Growth Policies in GG1 – 6.

User:	Association of Directors of Public Health

ADPH London agrees with design policies, with particularly strong support for Policy D3 (Inclusive design - in particular the requirement to include an Inclusive Design Statement in the Design and Access Statement. Amongst other things, inclusive design will ensure that disabled residents will have a safe and dignified escape route in case of emergencies); and Policy D7 Public realm.

User:	Mr Colin Bannon

3.31 Should sexual orientation also be included? Tying up with the LGBT+ venue charter, rainbow flags, etc.

3.3.4 Entrances need to be carefully considered in terms of their context so for example if a building is on a corner of a residential street and a commercial street, then the main resi entrance should be on the resi street, etc.

User:

Whilst we are supportive of the Policy D3, we are concerned that previous versions of this Policy (7.2 of the current plan and 4B.5 of the 2004 Plan) have not been delivered in a consistent manner across the boroughs. Further less and less boroughs have access advisors / experts within their planning teams and as such LPA are not able to enforce in an appropriate way. The current SPG serves as a clear guide on the process of delivering an inclusive environment as well as the need to engage access experts where appropriate and consult with local accessibility groups. Under the new Policy D11 Fire Safety we note that the Policy requires an Independent Fire Statement produced by a third party suitably qualified assessor as a reflection of the complexity of the matter, Policy D11 is similar to D3 in that it expects the highest standards of fire safety where D3 expects the highest standards of inclusive design. D3 also requires an Inclusive Design Statement. For consistency we recommend that D3 also requires the Inclusive Design Statement to be produced by a suitably qualified assessor.

User: Home Builders Federation

Policy D3: Inclusive design

We note the policy. The requirement that in all developments needing lifts one should be a fire evacuation lift suitable for disabled people is understandable. We note that the *London Plan Viability Assessment* has factored-in this cost (see paragraph 5.8.15). As most residential schemes will have to include this (because 10% of homes in all schemes must be wheelchair accessible, as required by Policy D5) and it will cost in the order of £20,000 per dwelling, this will be challenging for viability. This is especially the case in lower value areas on the basis of 35% and 50% affordable homes (see paragraph 14.2.4). This policy is unlikely to incentivise the construction of multi-storey blocks of apartments on small sites in the boroughs of outer London.

We understand the need to improve inclusivity, but as the Viability Report documents, we are not convinced that this objective can be achieved at the same time as all the other draft London Plan policy objectives, such as 50% affordable homes.

The Mayor will need to monitor how his design and construction policies together with his affordable housing targets are affecting the delivery of the housing targets. This is why it is important that the Housing Delivery Test is not adulterated by the Mayor, and that our recommendation that the Design Review process should be suspended in cases where local authorities have to produce an action plan to remedy past failure, should be incorporated in the draft London Plan.

Policy D4 Housing quality and standards

User: Mr Liam Kelly

D 4 F Access to natural light is a vital part of a healthy environment. Sensitive design shall both provide sufficient daylight and sunlight to new housing and avoid obstruction and overshadowing of existing homes nearby. Design features must remain within the BRE guidelines as per BR209 good practice guide including: **Overlooking, Loss of light to existing buildings Rights to light**, **daylight and sunlight to new developments**, **sunshine in gardens and open spaces**, **solar dazzle, electric** lighting pollution from proposed developments and infrastructure, and overshading of solar panels on nearby buildings, or on the proposed development itself.

Policies (p112-3) in supporting text (3.4.3; 3.4.7; 3.4.8; 3.4.9 and 3.4.10) should be included as well as some of the bullet point qualitative aspects in 3.4.11- e.g.-design meets challenges of changing climate, convenient and effectively designed waste disposal & recycling facilities, ease of window cleaning/maintenance by residents, cycle storage

User:	Federation of Small Businesses

Over 8 in 10 (83 per cent) FSB members believe London Housing costs pose a risk to business growth in the capital. It is a major welfare issue and so retaining staff is of critical concern. It is vitally important that we house the London workforce and future workforce in accommodation that is more than just liveable.

There is a growth in self-employment and working from home, which will have a significant impact on London's economy over the next 15-20 years. As commercial property becomes more expensive and individuals opt to work from home, this will have ramifications on utilities and ensuring that Broadband connectivity in new builds can accommodate superfast needs.

User: Association for the Conservation of Energy

Policy D4 Housing quality and standards

Paragraph 3.4.2 highlights that "*space standards are minimums which applicants are encouraged to exceed. However, due to the level of housing need and the requirement to make the best use of land, boroughs are encouraged to resist dwellings with floor areas significantly above those set out in Table 3.1 as they do not constitute an efficient use of land*".

ACE would recommend that energy inefficiency factors should also be raised. Properties that exceed the minimum space standards by a large margin can lead to energy inefficiency and can greatly increase the energy bills of properties making them unaffordable to run.

User: Ealing Matters

"New homes should have adequately-sized rooms and convenient and efficient room layouts which are functional, fit for purpose and meet the changing needs of Londoners over their lifetimes. Particular account should be taken of the needs of children, disabled and older people. … A minimum of 5 sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sqm should be provided for additional occupants."

These standards are too low. They fall short further than ever of Parker Morris standards and are insufficient to meet the needs of individuals and families. Unfortunately, too many developments in Ealing fail to provide accommodation of this level which means that new slums are being built. It must therefore be a requirement of the plan that these standards are a minimum, below which no residential development should be accepted.

User: My Fair London

We welcome the Mayor’s concern for space, and the minimum space standards he sets. We wonder whether he should also consider maximum space standards. In a city where some people have no-where to live, excessively large individual residential properties are very hard to justify and planning policy should resist them. Private residential pools, sauna, gyms and cinemas exacerbate separation between people of different groups and should be discouraged. If wealthy people want to swim, they should first work with their local council to help create more new public swimming pools, and so on.

We welcome the Mayor’s overall attention to achieving high design quality. We would encourage his design advisors to expose themselves the expanding body of knowledge of the influence of status and inequality on how we feel and act, and how our physical environments interact with these effects.

User: My Fair London

We welcome policies 3.4.8 and 3.4.9 on integration and gated communities. New developments should encourage the mixing of people from different economic backgrounds. Gated communities have no place in a fairer London. If people are worried about security they should lobby for a more equitable society (which will reduce crime and feelings of insecurity long-term) and/or support efforts to increase public revenues in support of good quality public services. The Mayor should resist the desire of wealthy populations for hypothecated spend on their own policing or security. Those most vulnerable to crime in our city are our poorest follow citizens.

Many detailed sections of the plan help with this. We strongly support the broad thrust of the Mayor’s design policies in chapter 3.

User: London Healthier Places

The LHP Network endorses the principle that all developments should be tenure blind. The quality and design and minimum space standards should not be based on tenure. The minimum space standards are in line with the Government's technical housing standards (March 2015).

The LHP Network supports that residential development should maximise the provision of dual aspect dwellings and avoid the provision of single aspect dwellings. Furthermore, aspects and design should take into account noise form roads and exposure to poor air quality arising from busy traffic.

The LHP Network supports:

• The requirement of at least 5m of private outdoor space per 1-2 person dwelling (and an extra 1sqm for each additional occupant)

• The requirement to provide externally accessible storage space for cycles, deliveries and other bulky items.

User:	Rosalind Readhead

I believe using open green space for housing is unnecessary and counter to the 'Good growth' aim. Gardens are vital for biodiversity, Healthy soils store carbon and mitigate flash flooding. I support densification of the Outer boroughs but within their current footprint. We must not lose small green spaces and back gardens when car parking has such a high footprint.(6.8 million car parking spaces in London taking up a minimum of 78.5 km sq).

https://londontransportdata.wordpress.com/category/subject/parking/

User:	Pilbrow & Partners
Subsection D4 (9 and 10) to be amended to add reference to include winter gardens. The use of balconies should not be the default position to so to enable flexibility in façade design appropriate to site context and environmental conditions.	

User: London NHS Clinical Commissioning Group

Policy D4 Housing quality and standards

The policy introduces new detailed standards for private internal space and private outside space, some of which have been taken from the Mayor's Housing SPG (2016). Clause E seeks to maximise the number of dual aspect flats which is welcomed as paragraph 3.4.5 notes single aspect dwellings are more likely to overheat and can have an adverse effect on health. The 'healthy housing' section of HUDU's Healthy Urban Planning Checklist (2017) refers to the current London Plan and standards in the Housing SPG (March 2016) and we expect that all standards are retained either in the policy or in new guidance (as noted in paragraph 3.4.12). The Plan should acknowledge that the quality of new housing across all tenures plays a key role in influencing the health and well-being of future residents and that the housing standards in Policy D4 and supporting guidance are important to help improve Londoners' health. It is suggested that a cross-reference is added to paragraph 1.3.3 to support the implementation of Policy GG3.

User:	U+I

We believe that the reference to space standards is superfluous and will only have the effect of reducing the valuable flexibility that is needed to allow for innovation in the market. The sentiment around protecting space is sufficiently covered by Paragraph B of the policy that “new homes should have adequately sized rooms and convenient and efficient room layouts which are functional, fit for purpose and meet the changing needs of Londoners over their lifetimes”.

User: Chartered Institute of Architectural Technologists

Policy D4

With the demand for space in London so high, it is pleasing to see the internal space standards for all housing, both private and affordable being set at the same level. This, we believe, will bring forward new and innovative design solutions. We are also pleased to see the presumption against gated developments, which by their own definition do not provide an inclusive environment.

User:	U+I

In areas of high-cost housing, the recently introduced National Space Standards have had the effect of increasing the price of housing. A range of recent innovations such as pocket homes, studios and town flats support the idea that housing, when specially-designed for certain stages of life, can be better delivered in smaller, higher quality, lower rent units. U+I recognises the value of minimum space standards. People need protection from poor design and inappropriate space. As such, we are not seeking a reduction in normal standards as part of our plans for compact living, only a sensible and clearly regulated exception. We welcome the Mayor’s pledge to ensure that any further national reviews of standards take into account London’s circumstances and, specifically, the changing trends in modes of living in the capital, principally the rise of the single occupancy household.

User: Notting Hill Housing Trust

NHHT is extremely supportive of Policy D4 Housing quality and standards. NHHT's own design guidance follows many of the requirements as set out in the policy. We are keen to review the Mayor's guidance on the implementation of this policy on those affordable housing tenures. As discussed in the
comments under Policy D2 Delivering good design, we are keen to ensure that good design is reviewed in context of providing quality living accommodation. As an active property developer and affordable housing provider we understand the value of providing useful and liveable spaces for our residents and understand the balance that needs to be struck between good architecture and providing sensible practical living accommodation.

User: Roca Investments

Policy D4 relates to housing quality and standards. There is far greater prescription in the draft London Plan than previous London Plans with more of the design standards previously contained in supplementary guidance in the Mayor's Housing SPG (both 2012 and 2016) now installed into the London Plan.

Policy D4 is considered to be too detailed and specific for a Spatial Strategy and the wording too prescriptive. The policy should be simplified by removal of all of the standards and replacement with a cross reference to the relevant section and detailed guidance of the adopted Housing SPG 2016 (Section 2) or any future replacement document. Reference should also be made to the National Technical Standards.

User: Zbig Blonski

Policy D4 – Housing quality and standards

19.There is no mention of overlooking, and privacy considerations and the way that daylight/sunlight is dealt with in Policy D4 F is wholly inadequate. There is no reason why the existing approach of separation distances of 18/21 metres should not be endorsed. This has worked effectively and where it has been properly applied it has resulted in liveable and popular environments even at high levels of density and proved not to be a constraint for high densities where these are appropriate.

20.The minimum floorspace standards are strongly supported however, the outdoor space standards are again totally inadequate and without justification. The minimum private outdoor space should be at least 10 square metres and not 5 square metres. The requirement in relation to additional amounts of space is poorly expressed. It should relate to bedspaces and not occupants as it is impossible to control actual occupancy.

21.Requirements in relation to communal space should also be included. A minimum of 50 square metres is used by many boroughs and is not difficult to provide in most circumstances. This is important for a variety of reasons. When sited at ground floor level it has benefits not just for communal use but to physically maintain separation distances to provide adequate outlook, privacy, daylight/sunlight and sense of place.

22.Also there should be strong encouragement for the creation of roof gardens and amenity terraces in flatted developments.

User: British Property Federation

In response to the Mayor's draft Supplementary Planning Guidance, we welcomed the intention to allow for flexibility on space standards particularly in Build to Rent developments and we are pleased to see that the LP will build on those set out within the SPG guidance. Research that the BPF commissioned in 2017, '*Unlocking the benefits and potential of Build to Rent*', revealed that a large number of local authorities implement policies which impose minimum space standards in new Build to Rent developments. These polices have been applied in order to ensure the quality of the units delivered and reduce the associated impacts of overcrowding, including harmful implications on mental and physical health. However, these policies, though commendable, are tenure-blind and ignore the key differences between Build to Rent developments and units developed for sale. Build to Rent developments contain additional common areas and services such as resident gyms, laundry rooms and communal lounges. These additional spaces mean that some of the occupier's daily activities may happen instead in communal areas, which could justify a more flexible approach to space standards for individual homes.

The prescriptive nature of the space standards set out in table 3.1 could inhibit new and innovative forms of housing coming forward; the LP should therefore provide the scope for an exception for developments which demonstrate exemplary design, in order to mitigate against this potential outcome.

User: Mr Simon Hoar

The removal of protection for back gardens.

The existing policy 3.5 has been successful in protecting much garden land from development. It would therefore be a backwards step in London's development as a City for people to live in and want to live in to remove that protection. The loss of back gardens has a huge impact on biodiversity and local character and flies in the face of the NPPF. This is especially true in the outer London suburbs, where many people have moved specifically because there is a higher level of greenery and back gardens to family homes whilst retaining reasonable (though not as good as) transport links into central London. Outer London is very different in nature to central London and this should be recognised with continued back garden protection.

Policy 3.5 should, therefore, be reinstated to maintain the current level of protection for back gardens.

User: Watkin Jones Group

Policy D4 Housing Quality

Whilst the overall aim of the policy is supported, the strengthening of the requirement for minimum residential space standards within all developments is not supported. With the ever-increasing population in London there is a need to provide suitable and affordable homes for all. To accommodate this growing population there will be a need to provide innovative types of residential products population due to the limited availability of land for residential development. As it stands, the policy, as currently worded does not allow for progressive and innovative micro-living concepts that could potentially provide a useful addition to the current housing choices within London.

In addition, it could potentially have a negative impact on the efficient use of land for development (i.e. if there is an irregular shaped site and there is some space that could be used for an apartment that does not meet the standards then the space would be wasted if the policy is strict and that reduced standards could not be agreed). The policy should be amended to enable flexibility in such circumstances whereby additional apartments not meeting the required standards could still be permissible. It should require that generally housing standards are met but enable some flexibility.

User:	Bell Cornwell LLP

We welcome the proposed consistency to minimum space standards, although consider there should be some flexibility for local planning authorities to take their own view on circumstances where differences could be acceptable. We also consider that the gross internal floor area for one bed/one-person units, which could be either studio or one bed apartments is excessively high. This category should be split into two to allow for studio apartments that have a substantial contribution to the housing land supply.

User: Town and Country Planning Association

Policy D4 Housing quality and standards

3.6.5 The TCPA supports this policy and believes setting minimum space standards will help drive up quality of new developments and also strongly supports its application to conversions and change of use. However the TCPA also believes such matters such out under D4 should be encouraged to be included as part of the prior approvals process for certain permitted development, namely conversation to residential use, and the London Plan can provide this requirement in policy or supporting text. The TCPA believes meeting these minimum space standards will not compromise the ability to deliver the number of homes needed, and to be innovative and creative in architectural design and planning of layouts within the building or across a development site.

3.6.6 In summary the TCPA supports Policy D4 with a recommendation to strengthen the policies as outlined.

User: Kenley & District Residents' Association

5 Backgardens should be protected

The changes propose to remove protection to back-gardens - this change is not aligned with the National Planning Policy Framework (NPPF). There is no reason to remove the back-garden protection that is provided in the NPPF.

User:	London Environment Directors' Network (LEDNet)

Policy D4 Housing quality and standards

G Dwellings **and communal collection areas** should be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) and food.

We welcome the reference to the report 'Waste Management Planning Advice for New Flatted Properties' that LEDNet commissioned with LWARB (3.4.11).

User: National Bargee Travellers Association

Policy D4 refers to bricks and mortar houses being designed, and site layout provisioned, so that each house enjoys a high level of natural sunlight. This has direct bearing on health and solar gain (in turn decreasing the energy consumption of the dwelling).

It is impractical to impose equivalent specifications onto boat construction specifications although boats are now routinely built with large but doubleglazed windows and 50-100mm of polyurethane foam insulation.

In addition a large proportion (approximately 81% [1]) of boats use roof-mounted solar panels for electricity generation. The siting of moorings must ensure that for as much of the year as possible sunlight will not be obscured from falling on the panels because of adjacent waterside developments.

It follows that Policy D4 must include reference to and encompass mooring provision.

[1] “Sustainable cities: an environmental sustainability study on canal-boat housing in London”, Grala, 19-12-2017

User: Crest Nicholson PLC

We consider this Policy to be unsound as currently drafted and amendments are required.

Policy D4 Part E and explanatory text paragraphs 3.4.4 and 3.4.5

Crest Nicholson are concerned that over emphasizing the need for dual aspect dwelling will impact on the delivery of the number of units across London and contradicts Policy D6A on Optimizing Housing Delivery. Plans with too many dual aspect apartments generate inefficient layouts which is unnecessary given both single and dual aspect units come with advantages and disadvantages and neither should be singled out as a better solution than the other

Single aspect dwellings are able to use convection for passive ventilation which can be encouraged by large windows with top and bottom openings to promote this. Mechanical Ventilation and heat recovery systems are used to filter air and reduce energy loss generating fuel savings and healthy living environments. Units that rely on cross ventilation promote heat loss and lead to increased energy bills. Furthermore, using passive forms of ventilation (cross venting) will not solve the issues of energy consumption or air quality.

Policy D4 Explanatory Text Paragraph 3.4.8

Crest Nicholson do not believe the wording of this paragraph is clear. Whilst we do not have a concern regarding the concept of schemes being tenure blind, we are concerned that integrating social rented/affordable rented and private entrances and lift cores will cause management problems. All Registered Providers we have experience of working with do not favour the approach and prefer to keep their entrances separate from the private. We suggest the second sentence is deleted.

User:	313-349 Ilderton Road LLP

Policy D4 Housing quality and standards sets minimum space standards for dwellings of different sizes and provides guidance on minimum ceiling height, single/dual aspect dwellings, amenity space amongst other design standards.

This policy is broadly similar to the adopted London Plan and is therefore supported.

User:	Catalyst Housing Limited

Draft Policy D4 relates to housing quality and standards, and amongst other things sets out the approach to dual and single aspect dwellings. At paragraph 3.4.5, the supporting text also deals with single aspect units. However, as currently drafted it is inconsistent with the policy. The supporting text sets out a number of factors that would lead to a single aspect dwelling not being permitted. This includes general reference to "single aspect units that are north facing", which is inconsistent with draft Policy D4 E. This may be because paragraph 3.4.5 is drafted as a series of 'ors', and this could be resolved by amending the second sentence to "single aspect dwellings that are north facing and contain three or more bedrooms and/or are exposed to noise levels above which significant adverse effects on health and quality of life occur should not be permitted". In other words, the 'presumption against' does not automatically apply to all single aspect dwellings.

User:	South East Waste Authority Planning Advisory Group (SEWPAG)

14. SEWPAG supports the mention of the work completed by LWARB and LEDNET concerning the management of waste from flatted development in paragraphs 9.8.17 and 3.4.11 but suggests consideration be given to inserting the wording of the template policy that was prepared as part of this work. An outcome of this work was a ‘Waste Management Strategy’ template to be used by developers to show how waste would be managed during the construction and operational phases of the development – it is considered that this template fulfils many of the requirements of a ‘Circular Economy Statement’ and could usefully be referred to and/or replicated in the ‘further guidance’ mentioned in paragraph 9.7.6. Indeed, perhaps the second sentence of paragraph 9.8.17 would also more logically appear within paragraph 9.7.6, or elsewhere within the supporting text for Policy SI7.

User: Silvertown Homes

Policy D4 effectively imposes minimum home standards for Class C3 homes under Table 3.1. This maintains the Mayor's current approach.
Taken together with other standards, the purpose of the minimum space standards is to ensure new homes provide Londoners with adequate accommodation. We support this objective.

The adopted London Plan however states at Part D of Policy 3.5 Housing Quality and Design of Housing Developments that 'development proposals which compromise the delivery of elements of this policy, may be permitted if they are demonstrably of exemplary design and contribute to achievement of other objectives of this Plan'.

The draft London Plan does not allow for this flexibility. In many instances there will though continue to be a case for homebuilders pursuing exemplary designs for homes which do not meet the minimum standards. In such circumstances exemplary design may help to reduce the cost of market housing for Londoners. It may also help to optimise the ability of such sites to provide 'genuinely affordable' homes.

Individual development sites also often pose design challenges. An optimised plan layout may result in space that does not for example meet the standard for a studio home. However, when averaged out as a whole the same building may achieve and exceed standards.

We recognise the extent of work invested in the Mayor of London’s evidence base on space standards. We suggest that the standards themselves should be revisited to allow for smaller units.

User: Silvertown Homes

Single aspect units

We strongly object to the suggestion at Part E in Policy D4 that single aspect units should normally be avoided. The preceding statement under Policy D4 more than adequately addresses this point: ‘Residential development should maximise the provision of dual aspect dwellings’.

The first two sentences under Paragraph 3.4.5 are even more onerous and should be deleted.
Experience confirms that single aspect units can be designed to be high-quality accommodation if they meet the standards set out in the Mayor’s Housing SPG. Including a proportion of single aspect homes in a development ensures that the overall capacity of a site to accommodate new homes can be optimised.

The profound potential consequences of the suggested policy approach are a reduction in the number of homes being delivered, which is contrary to the general thrust of the objectives of the draft London Plan.

The Mayor should amend Policy D4 and Paragraph 3.4.5 as outlined.

User:	Silvertown Homes

Policy D4 states that ‘The design of development should provide sufficient daylight and sunlight to new housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.’

The draft London Plan does not cite BRE guidance. This is welcomed, given the extent to which that document is arbitrarily applied. The draft London Plan should however be explicit on this point.

User: Orbit

Orbit fully supports the requirement for developments not to differentiate between different housing tenure types.

Orbit supports the statement under draft paragraph 3.4.10 that a variety of approaches to housing typologies and the layout of buildings should be explored. The draft Plan makes reference to supporting the form and layout of a place to be ‘street based’. **It would be useful for the supporting text to draft Policies D1 and D4 and/or the glossary to provide a definition of ‘street based’ which is understood to comprise: providing clearly defined public and private environments, and active frontages to engender streets-based activity and provide a sense of safety.**

User:	London Property Alliance
This sets out detailed and prescriptive development management standards that go beyond those necessary in a strategic plan.	

User: London Property Alliance

We suggest that some flexibility should be provided in Policy D4 to allow for sensible deviation from these standards in exceptional circumstances. For example, there will be some cases where, due to site orientation and configuration, single aspect north facing dwellings or dwellings with lower levels of daylight cannot be avoided. It may be that other aspects of the design, such as larger unit sizes, or larger communal or amenity areas, could contribute to ensuring that such developments still provide the very good standard of accommodation that Londoners expect.

Conclusion

Whilst the Alliance understands the priority for affordable housing to be provided onsite, we suggest that Part B of policy H5 is moderated to accept that off-site may also be acceptable in some instances, particularly in the CAZ, especially when this leads to more or better affordable housing. It should not be necessary to demonstrate exceptional circumstances whenever off-site affordable housing provision or a cash contribution is proposed in the CAZ. Payment should also be encouraged on sites where it is more appropriate than delivery of affordable housing on-site or off-site.

The Alliance also considers that land use swaps and affordable housing credits may also be constructively used to meet affordable housing policy. Policy H5(B) should be clear that the preference for on-site affordable housing relates to affordable housing that is required as a result of the operation of Policy H6. Use of off-site affordable housing, and PiL, should not automatically trigger the need to follow the Viability Tested Route.

The requirement for review mechanisms, particularly mid and late-stage review mechanisms, would introduce significant additional risk into commercial-led mixed use schemes. As drafted, an open-ended profit-share mechanism that covers both residential and commercial elements would create substantial additional risk for those promoting commercial development. This would be contrary to emerging CAZ policy.

The Alliance considers that the proposed approach to tenure split in Policy H7 and elsewhere within the draft Plan is too prescriptive, particularly for central London boroughs. Whilst the Alliance welcomes the additional flexibility introduced in Policy H7 to allow boroughs to develop their own preferred tenure mixes, it considers that the proposed approach to tenure split in Policy H7 and elsewhere within the draft Plan is too prescriptive, particularly for central London boroughs.

User: Bishopsgate Goods Yard Regeneration Limited

Policy D4 considers the quality and standards of housing and at Part D sets out the requirements for the provision of private open space. As currently drafted, the policy doesn't make any provision for those circumstances where it is not possible or suitable to provide private outdoor space. Each site is different and will face different challenges from its context, orientation and the mix and type of uses. This is particularly relevant in town centres and Opportunity Areas where the impacts from a neighbouring land use or transport infrastructure may mean it is not possible or appropriate to provide private open space.

The Mayor's Housing SPG provides detailed guidance for private open space standards and makes provision for measures such as oversized units instead of private outdoor space to provide flexibility. Our client considers that Policy D4 as current drafted is not justified and is too prescriptive, and should be revised to reflect the flexibility contained in the SPG.

Part E of draft Policy D4 states that single aspect units should be avoided. It is noted that due to site orientation there may be instances where single aspect homes cannot be avoided. It is also unclear how a tall building which provided a large number of units per floor could avoid any single aspect development. Our client considers that in some circumstances, single aspect units work very well and can provide high quality accommodation so long as designed appropriately. Therefore, whilst aspect is an important consideration, it should form only part of the assessment of residential design as a whole.

Within this context, Policy D4(E) as currently drafted will unnecessarily burden the design of schemes and could also limit the ability to optimise density as required by Policy D6. Our client therefore request that this element of the Policy be removed.

User: Barratt Developments plc

Policy D4 effectively imposes minimum home standards for Class C3 homes under Table 3.1. This maintains the Mayor's current approach.

Taken together with other standards, the purpose of the minimum space standards is to ensure new homes provide Londoners with adequate accommodation. We support this objective.

The adopted London Plan however states at Part D of Policy 3.5 Housing Quality and Design of Housing Developments that 'development proposals which compromise the delivery of elements of this policy, may be permitted if they are demonstrably of exemplary design and contribute to achievement of other objectives of this Plan' .
The draft London Plan does not allow for this flexibility. In many instances there will though continue to be a case for homebuilders pursuing exemplary designs for homes which do not meet the minimum standards. In such circumstances exemplary design may help to reduce the cost of market housing for Londoners. It may also help to optimise the ability of such sites to provide 'genuinely affordable' homes.

Individual development sites also often pose design challenges. An optimised plan layout may result in space that does not for example meet the standard for a studio home. However, when averaged out as a whole the same building may achieve and exceed standards.

We recognise the extent of work invested in the Mayor of London’s evidence base on space standards.

We do not suggest the standards themselves should be revisited. Instead we suggest that the flexibility currently allowed by Part D of Policy 3.5 should be maintained. This will not lead to a race-tothe-bottom but will allow exemplary schemes to come forwards, to the benefits of Londoners.

User: Barratt Developments plc

We strongly object to the suggestion at Part E in Policy D4 that single aspect units should normally be avoided. The preceding statement under Policy D4 more than adequately addresses this point: ‘Residential development should maximise the provision of dual aspect dwellings’.

The first two sentences under Paragraph 3.4.5 are even more onerous and should be deleted.
Experience confirms that single aspect units can be designed to be high-quality accommodation if they meet the standards set out in the Mayor’s Housing SPG. Including a proportion of single aspect homes in a development ensures that the overall capacity of a site to accommodate new homes can be optimised.
The profound potential consequences of the suggested policy approach are a reduction in the number of homes being delivered, which is contrary to the general thrust of the objectives of the draft London Plan.

The Mayor should amend Policy D4 and Paragraph 3.4.5 as outlined.

User: Vital OKR

Policy D4 regarding housing quality and standards, and Policy D6 regarding optimising housing density, have nothing to say about the inclusion of accommodation for other uses into predominantly housing areas and housing developments, nor about home?working and the need to allow for and support the evolution of accommodation to meet the needs of businesses that operate at or alongside homes. Likewise para 3.6.6 about masterplans and strategic frameworks makes no mention of non?residential uses. These are major omissions. The failure to mention the need to incorporate accommodation for non?residential uses is a shocking one, and is out of line with several other policies and paragraphs in the draft plan that prompted a mixed and hospitable city. This should be corrected.

We can’t help but point out how strange it is that the draft plan provides a policy on basement development (no doubt important and valid, but self?evidently niche) yet there is no significant mention in the entire chapter titled Design of our city's need to deliver much more mixed development, combining uses that it has for many decades been assumed to be desirable to separate, and that this is crucial to the city’s good growth and to its ability to sustain a welcome for all the economic and civic life that wants to find a home. We note the same in the entire Housing chapter. This is a substantial failing.

User:	North London Waste Plan
In D4 at 3.4.11 support the need for residential development to have recycling and waste disposal facilities in a convenient location to work for both residents and collection agencies – though this an issue for borough local plans.	

User:	London Borough of Sutton

OBJECT - UNSOUND - NOT CONSISTENT WITH NATIONAL POLICY. The London Borough of Sutton considers that Policy D4 has removed an important element of the previous London Plan Policy 3.5 that included a presumption against back garden land development. The council considers this should be reinstated. Furthermore, given that Paragraph 53 of the National Planning Policy Framework allows local planning authorities to have policies resisting the inappropriate development of residential gardens, this policy is contrary to national planning policy as it undermines boroughs' ability to plan against harm to their local areas. The Inspectors report into the Examination of Suttons Local Plan found favour with the persuasive evidence of immediate and cumulative harm to the green character of the Boroughs suburban areas, by finding the Council's renewed policy commitment to resist inappropriate back garden land development as being sound and in line with the NPPF and the current London Plan.

User: Old Oak Park Limited

Whilst we support the aspirations of this policy, we consider that it contains too much detail. If adopted, providing a one bedspace single bedroom less than 2.15m wide would cause a development to be not in accordance with the strategic development plan, for example, and so we consider that this level of detail should be provided within supplementary planning guidance instead. The supporting text provides further examples of overly-detailed and prescriptive guidance, for example at paragraph 3.4.3 which stipulates the proportions of floor area that can have a minimum headroom of 2.5m.

RECOMMENDATION: Remove all detail that is not of strategic importance, to be covered through supplementary planning guidance instead.

User: Elephant & Castle Properties Co Limited

Policy D4 – Housing quality and standards. We support the general approach to this policy but suggest further flexibility is included in Part F specific to daylight and sunlight.

The Housing SPG (March 2016) recognises the challenges of applying BRE guidance in dense areas such as London. This has since been recognised in a very recent appeal decision (ref. APP/E5900/W/17/3171437, 21/02/18) where the Inspector drew attention to the importance of a flexible approach. Based on this case law, and is as accepted across the industry, the policy should advocate an appropriate degree of flexibility when using BRE guidelines to assess daylight and sunlight impacts of development on surrounding properties, together within new residential development itself. The guidance should be applied even more flexibly to high density development, specifically in Opportunity Areas, town centres and well-connected locations.

User: Argent (Property Development) Services LLP

Draft Policy D4: Housing Quality and Standards

Draft policy D4 includes a sub-section on private open space. Whilst this policy draws on Standards 26 and 27 of the current Mayor's Housing SPG (2016), it does not make any provision for those circumstances where it is not possible or appropriate to provide a private outdoor space. This may be due to impacts from a neighbouring land use or transport infrastructure which are more likely to be factors in town centres or OAs where the majority of new housing is directed. The Mayor's Housing SPG currently makes provision for measures such as oversized units instead of private outdoor space to provide flexibility, whereas Policy D4 remains silent on acceptable alternatives, creating a conflict between the two documents. In any case, we consider that Part D of the policy is not effective or justified because the current Housing SPG and design standards already provide the necessary guidance on these matters and the draft London Plan therefore creates excessive prescription and duplication.

For the same reason, the statement in draft policy D4 part E that single aspect units should be avoided is not justified. East, west and south facing single aspect units can work very well, especially in taller buildings, and it is a very narrow measure of a unit's residential quality to judge it solely on aspect. In particular, it is unclear how all one bedroom units could avoid being single aspect within a development. The suggested draft policy text will unnecessarily burden the design of schemes and indeed could limit the ability to optimise density as required by Policy D6. In any case, the current Housing SPG adequately addresses the application of dwelling orientation in Standard 29 and therefore the need for this part of the policy is questionable.

Supporting para. 3.4.2 to Policy D4 makes reference to borough's resisting dwellings with floor areas significantly above those in Table 3.1 as they do not constitute an efficient use of land. It is not clear how this supports the density measures set out in draft policy D6: 'Optimising Housing Density' and in our view should be deleted.

User:	PRP
The Plan should recognise the different design challenges and brief requirements presented by large Build to Rent schemes. Flexibility regarding balcony size/provision may therefore be appropriate providing that suitable high quality communal amenities are available to renters.	

User: One Housing Group

Draft policy D4: ‘Housing quality and standards’

Draft policy D4 includes a sub-section on private open space. This draws on Standards 26 and 27 of the current Mayor’s Housing SPG (2016), however the draft policy doesn’t make any provision for those circumstances where it is not possible or suitable to provide a private outdoor space. This may be due to impacts from a neighbouring land use or transport infrastructure, which are more likely to be factors in town centres or Opportunity Areas where the majority of new housing is directed. The Mayor’s Housing SPG currently makes provision for measures such as oversized units instead of private outdoor space to provide flexibility. This part of the draft policy is not effective or justified because the current Housing SPG and design standards provide the necessary guidance on these matters and there is unnecessary prescription and duplication.

For the same reason, the statement in draft policy D4 part E which states that single aspect units should be avoided is not justified. East, west and south facing units, especially in tall buildings, can work very well and it is a very narrow measure of a unit’s residential quality to just judge it solely on aspect. It is unclear how all one bedroom units especially could avoid being single aspect within a development. Again, the current Housing SPG adequately addresses the application of dwelling orientation guidance (Standard 29) and the suggested draft policy text will unnecessarily burden the design of schemes and indeed could limit the ability to optimise density as required by draft policy D6.

Supporting para. 3.4.2 makes reference to borough’s resisting dwellings with floor areas significantly above those in Table 3.1 as they do not constitute an efficient use of land. This is not required given the density measures set out in draft policy D6: ‘optimising housing density’ and should be deleted.

User: Persimmon Homes

Part of the policy is unsound because it is ineffective.

The Policy is unduly prescriptive. We agree with the HBF that to assist delivery, flexibility should be introduced into the policy to allow the LPA discretion having regard to site specific circumstances. To this end we endorse the HBF's recommendation that that Part D is amended to read:

"D Housing developments are required to meet the minimum standards below unless other material circumstances justify a departure. These standards apply to all tenures…"

Part E - We considered that the presumption against single aspect dwellings is unnecessarily prescriptive, particularly if it is demonstrate that the development has adequate passive ventilation, meets daylight and privacy standards are avoids overheating.

User:	CFGN Community Food Growers Network	
	Amendments	Justification
Policy D4 **Housing Quality**	**Insert new clause on Communal open space.**	Currently we do not see the aspiration for inclusive neighbourhoods (including community food growing spaces) being implemented in the design policies for open space, as set out in the glossary definition of Inclusive neighbourhoods.

User:	CFGN Community Food Growers Network	
	Amendments	Justification
Para 3.4.6 Para 3.4.7 Page 113	Insert new paragraph on ‘Communal open space: In major development residents should have access to communal gardens where it will be possible to experience the seasons, enjoy plants and have the opportunity to engage in food growing themselves.’	Currently we do not see the aspiration for inclusive neighbourhoods (including community food growing spaces) being implemented in the design policies for open space, as set out in the glossary definition of Inclusive neighbourhoods.

User: Croydon Limited Partnership

Draft Policy D4 considers the quality and standards of housing and at Part D sets out the requirements for the provision of private open space. As currently drafted, the policy doesn't make any provision for those circumstances where it is not possible or suitable to provide private outdoor space. Each site is different and will face different challenges from its context, orientation and the mix and type of uses. This is particularly relevant in town centres and OAs where the impacts from a neighbouring land use or transport infrastructure may mean it is not possible or appropriate to provide private open space.

The Mayor's Housing SPG provides detailed guidance for private open space standards and makes provision for measures such as oversized units instead of private outdoor space to provide flexibility. CLP consider that Policy D4 as current drafted is not justified and is too prescriptive, and should be revised to reflect the flexibility contained in the SPG.

Part E of draft Policy D4 states that single aspect units should be avoided. It is noted that due to site orientation there may be instances where single aspect homes cannot be avoided. It is also unclear how a tall building which provides a large number of units per floor could avoid any single aspect development. CLP consider that in some circumstances, single aspect units work very well and can provide high quality accommodation so long as designed appropriately. Therefore, whilst aspect is an important consideration, it should form only part of the assessment of residential design as a whole.

Within this context, Policy D4(E) as currently drafted will unnecessarily burden the design of schemes and could also limit the ability to optimise density as required by Policy D6. CLP therefore request that this element of the Policy be removed.

User: North London Waste Authority

- Designing-in and operating on-site separate containers for waste and recycling collection services is an issue which isn't just one for owner occupied or new build premises. Flats are a key target within which to increase recycling so it is imperative that the NLP gives clear instruction on the requirements for all. We understand that even in outer London boroughs that a large proportion of the housing growth projected in the NLP will be delivered through flatted properties rather than houses. As a result, improving the performance of recycling in flats is fundamental to achieving Mayoral ambitions for recycling across the capital.
- NLWA supports the inclusion of collection containers for recycling and waste disposal within this paragraph, but there should also be mention of the importance of ongoing management of the onsite waste collection systems. NLWA recommends in this regard that there should be an explicit cross reference to the Resource London and LEDNET 'Guide to improving waste management in the domestic rented sector' available at: http://resourcelondon.org/resources/toolkits/guide-improving-waste- management-domestic-rented-sector/ such that developers would be obliged to follow this.

User: Blackheath Society

Policy D4 Housing quality and standards: The detailed specifications included in this section, including table 3.1 are welcome. It is very regrettable however that no comparison is provided with previous standards. Notwithstanding the pressures on housing in London, it is not clear why earlier minimum requirements should be relaxed, at least without strong justification. It is also unclear why the emphasis here and throughout the section is exclusively on new building with very little mention of re-purposing existing structures to residential use.

3.4.2: The suggestion that local authorities should resist applications for dwellings with floor areas significantly above the minima specified is surprising. Even acknowledging the existing housing pressures, this appears heavy handed and inappropriate.

User: Kesslers Stratford Limited

Draft policy D4 includes a sub-section on private open space. This draws on Standards 26 and 27 of the current Mayor's Housing SPG (2016), however the draft policy doesn't make any provision for those circumstances where it is not possible or suitable to provide a private outdoor space. This may be due to impacts from a neighbouring land use or transport infrastructure which are more likely to be factors in town centres or Opportunity Areas where the majority of new housing is directed. The Mayor's Housing SPG currently makes provision for measures such as oversized units instead of private outdoor space to provide flexibility. It is our position that this part of the policy is not effective and that given the current Housing SPG and design standards therein, further policy on standards such as private outside space is an unnecessary duplication.

For the same reason, the statement in draft policy D4 part E that single aspect units should be avoided should be revised. East, west and south facing units, especially in tall buildings, can work very well and it is a very narrow measure of a unit's residential quality to just judge it on aspect. We are unclear how all one bedroom units especially could avoid being single aspect within a development. Again, the current Housing SPG adequately addresses the application of dwelling orientation (Standard 29) and the suggested draft policy text will unnecessarily burden the design of schemes.

Supporting para. 3.4.2 makes reference to borough's resisting dwellings with floor area significantly above those in Table 3.1 as they do not constitute an efficient use of land. We are uncertain of the need for this statement given the density measures set out in draft policy D6: 'Optimising Housing Density'. This policy should be the test of whether land is being developed efficiently and it is still possible to optimise density whilst incorporating larger units.

User: Clarion Housing Group

Clause D4-A *"In ensuring high quality design, housing developments should consider the elements that enable the home to become a comfortable place of retreat and should not differentiate between housing tenures"*

The guidance that the Mayor will produce on the implementation of this policy for all housing tenures has to reflect the impact of services charges and the requirements for management plans set out in Policy D6 C para 3.6.8. The design of housing developments must consider this as well.

Clause D4-A **Add:** ***While tenure blind-design to maximise tenure-integration is desirable, and poor doors or other tenure distinguishing features should be avoided, the design must respond to the varied management regimes required rather than assume that a pepper potting approach will be acceptable.***

User:	Clarion Housing Group

D4-D *"Housing developments are required to meet the minimum [space] standards below. These standards apply to all tenures and all residential accommodation that is self-contained."*

It is positive that London's space standards are tenure blind, countering the former disparity between small flats being sold on the market and provision of grant funded homes of adequate sizes. We know from a housing management perspective that social housing tenants may be in their homes for a large proportion of the day and due to allocation policies will be occupying homes at the design levels of occupancy. These levels of intense occupancy require more than just compliance with the space standards but also careful design, layout, good quality material and robust details.

User: Dagenham Dock Limited

Draft Policy D4 – Housing quality and standards

DDL note the housing quality standards set out in Draft Policy D4 which broadly seek to align the London Plan with Part M Building Regulation and the Mayors Housing SPG (2016). Whilst the aspiration to secure the highest quality dwellings is supported by DDL; it is noted within Draft Policy D4a that the Mayor is seeking *'innovative housing designs'* in order to bring forward development across London and in particular on *'constrained sites'*. Therefore, the approach adopted within the draft London Plan to strictly enforce the minimum space standards could be considered at odds with an innovative approach to housing delivery. Whilst DDL understand that standards need to be established, DDL encourages the Mayor to consider a more flexible approach to minimum space standards in 'exceptional circumstances' where it can be demonstrated that it facilitates a more innovative design approach to housing.

User: Brent Cross Cricklewood Development Partners

Draft Policy D4 considers the quality and standards of housing and at Part D sets out the requirements for the provision of private open space. As currently drafted, the policy doesn't make any provision for those circumstances where it is not possible or suitable to provide private outdoor space. Each site is different and will face different challenges from its context, orientation and the mix and type of uses. This is particularly relevant in town centres and OAs where the impacts from a neighbouring land use or transport infrastructure may mean it is not possible or appropriate to provide private open space.

The Mayor's Housing SPG provides detailed guidance for private open space standards and makes provision for measures such as oversized units instead of private outdoor space to provide flexibility. The DPs consider that Policy D4 as current drafted is not justified and is too prescriptive, and should be revised to reflect the flexibility contained in the SPG.

Part E of draft Policy D4 states that single aspect units should be avoided. It is noted that due to site orientation there may be instances where single aspect homes cannot be avoided. It is also unclear how a tall building which provides a large number of units per floor could avoid any single aspect development. The DPs consider that in some circumstances, single aspect units work very well and can provide high quality accommodation so long as designed appropriately. Therefore, whilst aspect is an important consideration, it should form only part of the assessment of residential design as a whole.

Within this context, Policy D4(E) as currently drafted will unnecessarily burden the design of schemes and could also limit the ability to optimise density as required by Policy D6. The DPs therefore request that this element of the Policy be removed.

User:	Aitch Group

As above, my client is committed to delivering good design standards, which in some cases exceed those set out.

In relation to dual aspect accommodation and particularly the potential for the provision of north facing single aspect accommodation. Whilst it is my client's preference to provide dual aspect units this can be
difficult to achieve on tight sites whilst maintaining density.

In some instance, north facing single aspect units can be appropriate in sustainable town centre locations where a user can benefit from other amenities.

User: DTZ Investors

Scope of the London Plan and deviation from National Planning Policy

General concern is raised that with respect to the admission in the “Introducing the Plan” section that “the Plan deviates from existing national policy and guidance” on the basis that “the Plan is delivering on a specific Mayoral commitment”. It is a fundamental requirement for the London Plan to be consistent with National Planning Policy with Section 337(6)(a) of The Greater London Authority Act 1999 as the Secretary of State has the power to impose a direction to the Mayor of London not publish the London Plan if there is “any inconsistency with current national policies or relevant regional planning guidance”.

In this context, further concern is expressed that the Draft London Plan contains policies that are too detailed and overly prescriptive for a document which is to comprise the Spatial Development Strategy for London and is required by law (under Part VIII, Section 334 of The Greater London Authority Act 1999) to ‘deal only with matters which are of strategic importance to Greater London’.

In this context, particular concern is raised in respect the policies which set out requirements for design scrutiny (Policy D2); detailed internal space standards for housing and hotels (Policies D4 and E10); requirements for hot food takeaways (Policy E9) and temporary/’meanwhile’ uses (Policy H4), as containing a level of detail which goes far beyond the remit for the London Plan, which should addressed by local planning policies and supplementary planning guidance as appropriate, to meet individual boroughs’ needs and requirements. These policies in particular should be deleted or amended to ensure the emerging London Plan accords with the requirements of The Greater London Authority Act 1999.

User:	Landscape Institute London

Private Outdoor Space ‘A minimum of 5m2 for each 1-2 person dwelling and an extra 1 m2 for each additional occupant’ is very small: a car parking space is 11.5 m2.

User:	London Borough of Ealing

The Council supports this policy and the space standards which it implements. These have been well tested over the last plan period and have played a crucial role in driving up the standards of residential development in London.

User:	Landscape Institute London

3.4.6 States that this space, however, should be practical in terms of its shape and utility. LI London is concerned that balconies are permitted to be the sole form of private outdoor open space, with the result that Boroughs are seeing a huge rise in planning applications where private balconies are being provided for each unit to meet this standard in full i.e. no actual greenspace per unit just access to ‘fresh air’. LI London recommends that balconies are no longer acceptable as the sole form of private outdoor space. Alternatively, if they are, then the space standard should be increased to at least 8 m2 + 1 m2 per additional person.

User: EC Properties LP

Capco is fully committed to engaging with the Mayor and GLA officers in relation to a review of the approved Earls Court Masterplan, to deliver more homes and, in particular, more genuinely affordable homes. Additionally, Capco, as appropriate, is willing and able to assist in the formulation of the London Plan approach to Opportunity Areas, high density and design/development standards. Some general comments and observations in this respect are set out below:

Approach to daylight and sunlight for neighbouring residents: GLA planning officers will be aware of the risk that a rigid application of the BRE guide would pose to optimising housing densities. Capco is concerned that the Draft New London Plan does not address this risk. Given detailed Policies that have been drafted on other design standards and amenity considerations, it is felt entirely appropriate for the Plan to specifically address daylight/sunlight and the use of the BRE guide. Capco proposes that text is added to Policy D4 stating that an appropriate degree of flexibility should be applied when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties, as well as within new developments themselves. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time. The degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London. Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm.

User: Arup Building Engineering Team

We support an overall approach to housing quality, and agree that amenities can be qualitative as well as quantitative.

It will be important to provide supporting guidance on quality. For example, on what 'sufficient daylight and sunlight' is. The plan ought to prevent over stretching the concept that a central location is equivalent to having good daylight and enabling poorly designed housing stock as a result. The issues are complex and inter-related, but planning departments will need to be able to have guidelines against which to judge a scheme in order to defend design quality.

We support the promotion of dual aspect dwellings and again suggest specific guidance is given on assessing the quality of single aspect dwellings.

Public Education

We don't see this covered in the plan, but note that there is a need for widespread education about the design, operation and maintenance of new housing types – particularly new and refurbished buildings where building fabric standards are better and the operation of ventilation systems is critical to delivering appropriate fresh air. Very simply, there is a problem with people not opening their windows enough or understanding how to use their homes that is causing problems which could very easily be avoided by public education. Refer to work done by MEARU http://www.gsa.ac.uk/research/research-centres/mearu/ ; https://www.architectsjournal.co.uk/news/public-health-at-risk-frompoorly-ventilated-homes-warn-gsa-experts/10005896.article

Policy D5 Accessible housing

User: Mr Peter Eversden MBE

Policy D5 is generally supported but it is deficient on one aspect of accessibility. It could benefit from an additional section which requires that ' Boroughs should consider the access into and out of housing developments and the quality of the route from them to bus stops and to local infrastructure facilities to ensure that people who are disabled have equal chances as others to lead a satisfactory life in the community without unnecessary help.'

User: Bal Kaur

I wonder if you could advise please whether the Mayor has included any new changes in the following in relation to the new proposed *London Plan*: -

1. re: building rear single storey extensions to residential dwellings in London boroughs.

2. back garden developments of any kind at residential dwelling houses in London, including building separate accommodation for carers of disable / infirm / the elderly

3. facilitating *Lifetime Home Standards* for the infirm, disabled or elderly, allowing them to modify their own homes so that they can adapt them to their own needs, so that they can stay in their own homes and live as independently as possible without looking to care and nursing homes.

I'd appreciate your detailed reply regarding this please.

User:	Levitt Bernstein
We suggest that this section is fully integrated with inclusive design and relocated to Chapter 4 – Housing.	

User:	Levitt Bernstein
This duplicates Building Regulations and should not be in planning policy because that implies assessment at planning stage.	

User:	Levitt Bernstein
This duplicates Building Regulations and should be removed.	

User:	Levitt Bernstein
The first half of this paragraph is unnecessary.	

User:	London Forum of Amenity and Civic Societies

Policy D5 is generally supported but it is deficient on one aspect of access. It could benefit from an additional section which requires that 'Boroughs should consider the access into and out of housing developments and the quality of the route from them to bus stops and to local infrastructure facilities to ensure that people who are disabled have equal chances as others to lead a satisfactory life in the community without unnecessary help.'

User: Trust for London

We welcome this:

- In recent years, the proportion of new build homes (excluding conversions) that are wheelchair accessible was 9%, and 81% Lifetime Homes. (Source: Housing in London 2017)
- Altogether there are around 200,000 households in London who require a home adaptation because of the disability of a household member. Of these, around 25,000 households (12%) say they are attempting to move somewhere more suitable to cope with a disability. Around 8,500 of these are on a social housing waiting list, of whom around 3,400 are not currently already in social housing. (London Strategic Housing Market Assessment 2017)

However, we believe there should be a target that a large number of these 'wheelchair user dwellings' are affordable too. With disabled people in London more likely to be low paid (37 per cent of disabled workers are low paid compared with 27 per cent of non-disabled workers), and people. with a disabled adult in the family more likely to be in poverty than those without (35 per cent compared with 25 per cent) it is necessary for housing to be provided to meet a range of income brackets including those suitable for people on a low income. Data from London's Poverty Profile https://www.trustforlondon.org.uk/data/disability-and-poverty/

User:	Trust for London

We welcome this. Disabled users are similar to other residents in seeking choice, and being distributed across tenures, including high-income owner occupiers, families and those of working age. They therefore should be treated as potential consumers for a range of types of home. (Source: LSE 2016, “No Place Like An Accessible Home”). http://www.lse.ac.uk/business-and-consultancy/consulting/assets/documents/No-Place-Like-an-Accessible-Home.pdf

User:	Trust for London

We would be concerned about the potential for the ‘affordability of service charges’ criterion to become a loophole. Further clarification should be provided on the circumstances this is expected to apply.

User: The Access Association

Policy D5 Accessible Housing

This policy should apply to conversions and extensions (where feasible). As a minimum it should encourage planners to ask if any will be accessible?

The requirement for accessible car parking is gone from the previous London Plan and this is a backwards step. It should be brought back.

There is no mention of what will happen with the Accessible housing register. Accessible housing is being built but how will disabled people find it. Can accessible market housing be advertised separately to those who need it before it is opened up to the general public?

It is a retrograde step from the previous two London Plans to only apply accessible housing standards to new build housing. Lifetime Home standards and wheelchair accessible housing standards have been applied to all new housing in London since 2004 and there is no reason why this policy should not continue. It is unacceptable to now omit the requirement to provide accessible homes in buildings being converted into housing.

A separate policy should be included on this issue. It should be made clear that it is a planning issue to be addressed by the planning authority. This will help to overcome the difficulty of linking the accessible housing standards to the building regulations.

There is no mention of dog spending areas and exercise areas of assistance animals and with many municipal and local parks not allowing dogs this creates a barrier for disabled people.

3.5.3 “To ensure that all potential residents have choice within a development, the requirement for M4(3) wheelchair user dwellings applies to all tenures. Wheelchair user dwelling should be distributed throughout a development to provide a range of aspects, floor level locations, views and unit sizes”.

These comments provide welcome support to those wishing to supply a variety of dwellings for disabled people on various floors and elevations, instead of applying the one-size fits all approach.

Supporting paragraph 3.5.4

Concerned that this policy on accessible housing is in the design section rather than in the Housing section so it may get lost?

It would be helpful to include in this paragraph a sentence that explains what is not considered to be easily adaptable – i.e. no structural alterations/ moving walls etc only alterations that can be done easily and quickly while the resident remains insitu (see wording in SPG Accessible London).

One way to save on the cost of adaptations and enable many older people to return to their own homes quickly after a hospital admission is to install a walk in shower in every new home instead of a bath but located in an 1800mm long space so that occupiers can choose to easily install a bath if they wish.

Wheelchair accessible and wheelchair adaptable should consider potential locations for charging mobility scooters. Current designs locate these charging points more than 50m away from the dwelling; and do not take into account the fact that some disabled and older people cannot walk more than a few steps, if at all.

Supporting paragraph 3.5.6

It should be made clear that a lift should be an 8 person lift as a minimum.

Relaxation of requirement to provide a lift in a number of circumstances:

“Blocks where the implications of ongoing maintenance costs on the affordability of service charges for residents will be prohibitive.”

This latter category is a cause for concern as it restricts options for many disabled people, at the same time guidance on the application of service charges is limited and can be artificially high. Surely the priority is to ensure that the vast majority of dwellings particularly those in M4 (2) and M4 (3) are accessible regardless of the tenure or service charges?

3.5.7

This conflicts with H2 small sites policy but is definitely the preference.

3.5.8

This is an important improvement on the current system, as it will create a register of sorts; which details how many wheelchair accessible and wheelchair adaptable units will be created on each development and can help in the provision of health and social facilities to support the neighbourhood.

User:	Centre for Accessible Environments

Welcomed. In some developments/types of housing provision of M4(3) Category 3 should exceed 10% e.g. older persons housing, specialist housing for younger adults with a range of impairments.

Some Local Authorities may require more than 10% M4(3) Category 3, based on levels of existing provision.

User:	Centre for Accessible Environments

This is welcomed, as opposed to trying to put all the wheelchair units on the ground floor. Boroughs are reporting that disabled residents, whilst they may wish to reside above the ground floor e.g. for security/outlook etc, are refusing such flats where there is only single lift provision. Wording should therefore be added which encourages the provision of 2 lifts where at all possible and/or alternative access to secondary lifts e.g. routes through to another core in the event of lift breakdown/servicing and as a minimum 24 hr lift breakdown call out (robust management plans).

User:	Centre for Accessible Environments

This appears to be a backward step to the wording in the MALP which was much more around the requirement to provide a lift and provide viable evidence where this could not be done.

User: Mr Liam Proudlock

The draft states that **Local Plan policies for wheelchair accessible homes should only be applied to those homes where the local authority is responsible for allocating or nominating a person to live in that dwelling, otherwise M4(3) dwellings should be wheelchair adaptable.** However, the draft needs to be clear that this is in reference to the design at the point of delivery / handover, and that those dwellings which are not the responsibility of the local authority that only hence need to meet the M4(3) adaptable standard are still required to fully meet the adaptable standard including being easily adaptable to meet the M4(3) accessible standard if required by a resident / tenant in the future. Otherwise it could be assumed that those adaptable standard dwellings will never actually need to meet the accessible standard and hence would be acceptable at planning with (for example) the smaller bathroom spaces associated with adaptable. In such a situation, it is likely that the dwellings could not be adapted later to the accessible standard because there just isn't the space to do so, and the argument that the dwellings meet the requirements because they meet the 'adaptable' *layout* / *spatial* standards may be seen as adequate but this would clearly be a loss in terms of accessibility / inclusive design. It should be clear in the London Plan that to meet the 'adaptable' M4(3) standards the requirement is that they must be adaptable to meet the accessible standards post-planning, with the required spaces / layouts to facilitate this or to make it feasible.

User: McCarthy and Stone Retirement Lifestyles Ltd.

D5 (115) - Accessible Housing

The policy states that developments should to be designed to M4(2) with at least 10% of units to be M4(3) ‘wheelchair adaptable’.

Para 3.5.3 then states that ‘wheelchair user dwellings should be distributed throughout a development to provide a range of aspects, floor level locations, views and unit sizes.’

This is inconsistent with national policy. Paragraph 56-009 of PPG states that: “Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.” The Mayor should therefore not apply the higher level Part M4(3) to market homes. The Mayor should amend this part of the policy and clearly state that this will not apply to market homes.

We support this policy in principle subject to flexibility being applied.

User:	Alliance for Childhood

A. add ‘children and young people as follows:

disabled people, older people, **children and young people** and families with young children

User: David Bonnett Associates

On sites that provide 10 or fewer dwellings:

M4(3) standard. Policy H2 G - In a site that provides 10 dwellings, a 10% is still 1 no. dwelling that could be designed to M4(3) standards if located at ground floor level. If 9 units are provided, 10% could be rounded up to provided 1no. M4(3) unit. It would be interesting to hear what local authorities think about M4(3) units not being provided, as LA's manage some housing for disabled people. Would it be maybe harder to manage one M4(3) unit on it's own on a site instead of having more of these units on one site for ease / less cost of maintenance.

Exemption from M4(2) standard. Where providing lift access is not feasible, dwellings above ground level could still meet M4(2) internal requirements, to set the base for fully compliant M4(2) units if a lift is provided in the future. E.g. large residential developments in central London which are allowed to take this exemption for a small percentage of the overall housing provision, but may not be facing a viability issue across the whole development (specially in regeneration sites in key locations of consolidated urban areas). All units should be M4(2) otherwise the Plan contradicts itself where it says elsewhere that spacious and accessible housing should be provided in London. Pocket Homes build on small sites and normally provide wheelchair accessible units - one good example.

User:	David Bonnett Associates

Conversions. D5 applies only to new developments. There is a question as to whether it applies to extensions / conversions. However answer to this is unclear.

There are concerns about conversions and changes of use not needing to meet accessible housing policy at planning stage (e.g. department stores, warehouses, offices, etc converted to housing).

DBA´s interpretation is that any conversions from other use to housing should still be considered “new housing developments”.

User:	Inclusive Design and Access Panel

- D5 – 3.5.3 – Support, We greatly support this and welcome it’s inclusion.
- D5 – Support - This is very encouraging but also needs to refer to large scale conversion works for existing buildings such as office block conversion.
- D5 – 3.5.6 – Object, this could be used to get out of planning standards. The number of stories should be reduced.

User:	Putney Society
We support the 10% requirement until supply catches up with need.	

User: London Borough of Islington

Chapter

Design

Draft London Plan Policy

Policy D5 – Accessible Housing

Islington Response

We have the following detailed comments on policy D5:

- It is unclear why the policy distinguishes between ‘housing quality and standards’ and ‘Accessible Housing’. The GLA made a powerful case with the MALP, demonstrating the universal nature of visitability and adaptability. Logically these qualities should be integral to the ‘good design/planning’ of new homes and part of one policy.
- 3.5.6 - Lift provision (and therefore M4(2) compliance) should be a general policy requirement with deviation where the case-specific circumstances are clearly demonstrated by an applicant, with reference to the particulars of a specific site. It is not helpful to specifically identify circumstances in policy.

User:	Association of Consultancy & Engineering

In order for London to be seen as an inclusive city, it will be vital that its homes are accessible to all. Sub-par amenities, can often discourage users if their overall experience of them is unpleasant, undignified or impractical. It is vital that access for disabled, elderly and children is truly accommodating through high standard facilities that will consistently deliver excellent levels of accessibility. This must follow from considerations at the design stage.

User: Galliard Homes

We support the intention behind Policy D5 – Accessible Housing, but we question if there is any justification to part A(1) that requires 10% of new buildings being wheelchair accessible or easily adaptable for residents who are wheelchair users. We appreciate that this is a policy roll-over from the original London Plan (2004), but what evidence is there to suggest that 10% is a justifiable provision? Has the GLA been monitoring actual occupation of these dwelling types by intended occupants? Is there a chance that since 2004 we have been overproviding these specialist unit types?

A review of our private sales figures confirms that only approximately one fifth of those designated private wheelchair units are actually sold to those for whom they were designed for – equivalent to 2% of the whole development. We feel there needs to be more flexibility in this policy to suit individual local authority needs.
The use of a condition outlined in paragraph 3.5.8 is supported, provided it corresponds with the approved Design and Access Statement and doesn't impose an additional layer of compliance.

User:	Simon Saville

I broadly welcome policies D1 to D6 that seek to improve the design and land use efficiency of new housing.

User:	London Borough of Barnet

Support. However we consider that the supporting text could clarify the extent to which it applies to new dwellings. Policy D5 states its application to “residential development” but the supporting text refers to its application to “all new build dwellings”. This creates ambiguity with regard to changes of use to residential and conversion.

User:	London Borough of Lambeth
Lambeth supports this policy	

User:	London Tenants Federation

3.5.1 Policy D5 Accessible Housing

Affordable housing landlords should ensure that new homes that are designed to provide accessible housing are maintained as such.

User:	London Borough of Haringey

This policy is supported.

The supporting text could provide greater clarity on the extent to which it applies to new dwellings (i.e. new build and / or change of use / conversions).

User:	London Cycling Campaign

Add:

3) ***accessible housing should be designed with convenient parking provision for adapted cycles/wheelchairs and reserved for this purpose***

See Plan page 115 bullet three: “sufficient level, secure and convenient externally accessible storage is provided for cycles, deliveries, and other bulky items”.

User:	London Borough of Hounslow
LB Hounslow supports this policy	

User:	London Borough of Barking & Dagenham

We would like to see a more ambitious target than the current 10%. This is to take into account the growing ageing community, likely higher levels of disability and the pressure on beds being “blocked” whilst awaiting simple home refurbishments.

User:	London Borough of Brent

This policy is supported. The supporting text could provide greater clarity on the extent to which it applies to new dwellings. The policy states its application to "residential development". The policy justification however refers to its application to "all new build dwellings" which provides ambiguity over development such as changes of use to residential and conversion, which must be clarified.

User:	London Borough of Bromley

The Council supports the policy which reflects draft Policy 4 Housing design, but queries the language in para 3.5.4 which reflects that within the draft Local Plan para 2.1.59 to which the GLA objected to in prompting a proposed modification which has been submitted to examination. The clarification regarding lift provision is noted.

User: London Councils

While the overall aims of this policy are positive, the objective that only 10% of new housing should be wheelchair accessible may be too low. Over the coming years the growth in people living with physical disabilities in London will rise at a faster rate than other regions. It is therefore important that new housing developments meet the needs of London's growing population. As recognised in recent GLA guidance, in addition to the growth amongst people with physical disabilities, the number of older people and people with multiple complex long term conditions who may need accessible housing is also rising. This will impact on how much accessible housing that London needs.

Having a surplus of accessible housing will also help to ease the pressure on social care and health. Often delays in getting people out of hospital can be caused having to refurbish homes to make them accessible before people can be moved back. This can also result in people being moved out of their homes in to residential home settings which are more costly and also can impact health and care outcomes.

User: London Borough of Tower Hamlets

We are broadly supportive of this policy and the increase from 90- 100% accessible and adaptable is welcomed.

However we seek to encourage an approach which would require the provision of 2 lifts in the majority of cases to ensure true accessibility taking account of lift fallibility. In relation to this, clarity is also sought on the relationship with policy D11 Fire Safety which seeks safe exit for disabled residents.

User:	Royal Borough of Kingston
Support.	

User: Hammersmith and Fulham Disability Forum

31. Policy D5: Accessible Housing

We do not understand why the New London Plan continues to separate Policy D5 Accessible Housing from Policy D4 Housing Quality and Standards. All new build dwellings must comply with layouts from either M4(2) accessible and adaptable dwellings or M4(3) wheelchair user dwellings.

32. Our experience from reviewing a large number of planning applications is that developers and case officers do not really understand 2 key issues:

• minimum space standards in the London Plan are not sufficient to deliver M4(3a) wheelchair adaptable market dwellings or M4(3b) wheelchair accessible affordable dwellings.

We have seen examples of M4(3) wheelchair user dwellings shoehorned into London Plan minimum space standards or M4(2) accessible and adaptable dwellings on drawings submitted to the planning authority. This Is not acceptable because it does not deliver compliant wheelchair user dwellings. if Planning does not get the space and layout right at planning application stage there is little that the Building Control body can do to recover the situation later because the space is not available.

The New London Plan should confirm that M4(3) wheelchair user dwellings cannot be achieved within these minimum space standards. The Government has already confirmed this but few people know about ***Technical housing standards – nationally described space standard para 9 (THIS IS A HYPERLINK)***: *"The Gross Internal Areas in this standard will not be adequate for wheelchair housing (Category 3 homes in Part M of the Building Regulations) where additional internal area is required to accommodate increased circulation and functionality to meet the needs of wheelchair households."*)

We have also seen drawings for M4(3a) wheelchair adaptable dwellings where if a purchaser or occupier needed to adapt the dwelling into a M4(3b) wheelchair accessible dwelling at a later stage they have to remove retaining walls, storage space or number of bedrooms etc which is against M4(3a) wheelchair adaptable dwelling standards. This is not acceptable.

• The significance of M4(3a) wheelchair adaptable dwellings and M4(3b) wheelchair accessible dwellings in affordable housing

When the local authority has nomination rights we regularly see examples of M4(3a) wheelchair adaptable dwelling layouts provided instead of M4(3b) wheelchair accessible dwelling layouts. This distinction matters because:

• M4(3a) means the dwelling is adapted into a wheelchair accessible dwelling ***after completion.*** Taxpayer funding is then used to adapt the dwelling for a wheelchair user.

• M4(3b) means the developer provides wheelchair accessible dwellings on completion so no taxpayer funding should be involved.

33. We consider that the London Plan should take the lead to clarify both these key issues. We recommend that Policy D5 Accessible Housing be re-drafted. It is not enough to mention it in para 3.5.4 because people may not see this para. if it is not possible to amalgamate these 2 Policies we suggest the following:

“A: To provide suitable housing and genuine choice for London’s diverse population, including disabled people, older people and families with young children, residential development must ensure that:

at least 10 per cent of new build dwellings meet Building Regulation requirement M4(3) ‘wheelchair user dwellings’, i.e. ***M4(3a) wheelchair adaptable dwelling easily adaptable for residents who are wheelchair users or M4(3b) designed to be wheelchair accessible on completion (where the local authority has nomination rights for affordable housing),*** or

all other new build dwellings meet Building Regulation requirement M4(2) ‘accessible and adaptable dwellings’.

34. Para 3.5.8: We welcome the para confirming that M4(2) and M4(3) dwellings should be secured by condition at planning approval stage and that planning conditions should specify numbers of dwellings in 3 separate categories.

• M4(2) accessible and adaptable dwellings.\
• M4(3a) wheelchair adaptable dwellings.
• M43b) wheelchair accessible dwellings.

35. However, this is only half the story. We are clear that the role of Planning in relation to M4 Building Regulations is to secure

• correct number of dwellings as in para 3.5.8
• correct space and layout for the numbers of dwellings in para 3.5.8.

36. If the footprint and building envelope cannot deliver the space or compliant layouts required at FUL/OUT planning approval stage to deliver the detailed M4 technical requirements it then becomes a serious problem for the planning authority and the Building Control body. Neither the planning authority (at DET/RES stage) nor the Building Control body can make the building larger to accommodate compliant M4(2) or M4(3) dwellings. We always review M4 layouts (particularly M4(3a) and M4(3b) submitted for approval for this reason. We strongly recommend revising para 3.5.8 to include this.

37. “Para 3.5.8: M4(2) and M4(3) dwellings should be **secured via planning condition** to allow the Building Control body to check compliance of a development against the optional Building Regulations standards. Planning conditions should specify:

• Number of dwellings per size typology (i.e. x no. of y bed units) which are required to meet M4(2)

• Number of dwellings per size typology (i.e. x no. of y bed units) which are required to meet M4(3) wheelchair accessible standards

• Number of dwellings per size typology (i.e. x no. of y bed units) which are required to meet M4(3) wheelchair adaptable standards

Drawings to provide compliant layouts for

• M4(2) accessible and adaptable dwellings.
• M4(3a) wheelchair adaptable dwellings.
• M43b) wheelchair accessible dwellings”

Policy D6 Optimising housing density

User:	Paul Benedyk
Excessive housing densities in new development should be resisted to protect the local character of London’s neighbourhoods.	

User: The British Library

Policy D6 – Optimising housing density

Whilst it is acknowledged that there is a need to optimise housing density on sites in London, to support and sustain growth in the City, it is considered that this policy should clarify that this is only appropriate and applicable to sites suitable for residential development. There are many other sites to be developed in London, which would be best served being developed for other uses outside of the residential use class.

User:	Barratt Developments plc

Paragraph 3.6.6: Use of masterplans and strategic frameworks in relation to density

This paragraph does not directly refer to this but is set out in the supporting text to Policy D6.

The London Plan must be clear that planning documents and especially supplementary planning guidance must not prescribe densities. Any such approach would be inconsistent with England's discretionary planning system and seems likely to deliver suboptimal outcomes.

User:	London Borough of Sutton

OBSERVATION. Whilst the London Borough of Sutton supports the design-led approach to bringing forward development sites, it is concerned that the policy expects all new development to achieve higher densities, which seems to contradict the approach of optimising density on a site as it has little regard for the role of exemplar design. Taking the local context and character into account, as required by other draft policies, may not lead to higher density development being the optimal solution. This has the potential to cause significant harm to the character of an area and is not consistent with Paragraph 58 of the National Planning Policy Framework.

User: Old Oak Park Limited

Part C states that a management plan should be submitted for developments that exceed the density thresholds identified in the policy. Paragraph 3.6.8 identifies what this management plan should contain. It is not clear why this management plan is required or how the information it requests, including running costs and service charges, can be known at the planning application stage. Some of the information is already required in any event. We do not consider that the affordability of services has any relevance to the density of a development, and as such object to the requirement to provide these management plans. The density of a development should be assessed at planning application stage, and only approved if it can be justified in design terms – noting that density is just one characteristic of a development and should not be considered in isolation from other issues such as design quality, residential amenity and impacts on the surrounding environment.

Part D identifies the measures of density that should be submitted with an application. However, these are not appropriate for mixed-use developments.

We consider that Part E is too prescriptive. These measures will vary greatly from site to site and without a guide as to what is appropriate in each urban context, there is significant potential for such measurement approaches to unduly constrain or shape development.

RECOMMENDATION: Delete the requirement to submit a Management Plan from Part C. Amend Part D to identify how these requirements relate to mixed-use development. Delete Part E.

User:	Jonathan Rooks
Excessive housing densities in new development should be resisted to protect the local character of London’s neighbourhoods.	

User: Conservative Councillor for Sanderstead Ward, LB Croydon

The removal of the density matrix, which sets limits on housing density.

The density matrix should be re-instated to ensure that new development suits local character and is at an appropriate level for the surrounding area.

The vague guidance that is now being proposed will allow developers to have free rein in the development of sites, without reference to character or suitability

User:	Elephant & Castle Properties Co Limited

Policy D6 – Optimising housing density. We support this policy and the removal of density targets, instead optimising density based on context, accessibility and infrastructure provision. However, the management plan arrangements are not relevant to density considerations. We agree that higher density development may need to be subject to greater levels of design scrutiny, however the detail suggested for management plans (e.g. service charge costs) is not usually available at planning application stage. Any requirement for management plans are usually subject to planning condition, and therefore this requirement should be removed, or else relocated elsewhere in the plan.

User: Argent (Property Development) Services LLP

Draft Policy D6: Optimising Housing Density

Argent welcomes the Mayor's revised approach to optimising housing density set out in Policy D6, thereby replacing the housing density matrix which has arguably been ineffective for a number of years.

Supporting paragraph 3.6.2 states that it will not normally be necessary for minor developments to undertake infrastructure assessments, with the implication that major developments should undertake such an assessment. However, it is unclear why infrastructure assessments (beyond what is currently undertaken in documents such as a Transport Assessment) are required to accompany planning applications for major developments. It is for each local planning authority when preparing their Local Plan to establish what infrastructure is required to deliver the plan's growth targets which in turn links to the setting of Community Infrastructure Levy (CIL) rates. Applicants should not be subject to any further burdens and in our view, this requirement should be deleted.

User: South Croydon Community Association

However, we have serious concerns to Section 3 with the following issues, which largely emanate from the unreasonable housing targets being concentrated within the area of our South Croydon community.

Unacceptable Density:

1. **The density matrix should be reinstated** as it is necessary to have set limits on the grounds of reasonableness for the protection of the existing character of an area and for good design and quality of life for the community.

User: Owners and Tenants of Cygnus Business Park

Policy D6: Optimising housing density

4.7 In the spirit of Policy GG2 above, Policy D6 establishes that development proposals should be designed to achieve the optimum density, making the most efficient use of land as appropriate to the site, its accessibility and the capacity of surrounding infrastructure.

4.8 We agree with the objectives of this policy, recognising that growth needs to be accommodated in an efficient and inclusive manner, ensuring housing density is optimised through appropriate redevelopment and design; this is in keeping with the Government's imperative of boosting housing supply as per the fifth bullet point of paragraph 47 of the Framework which encourages Authorities to set their own approach to housing density to reflect local circumstances.

User: One Housing Group

Draft policy D6: ‘Optimising housing density’

OHG welcome the Mayor’s revised approach to optimising housing density set out in draft policy D6, thereby replacing the housing density matrix which has been ineffective for a number of years.

Supporting para. 3.6.2 states that it will not normally be necessary for minor developments to undertake infrastructure assessments, with the implication that major developments should undertake infrastructure assessments. However, it is unclear why infrastructure assessments (beyond what is currently undertaken in documents such as a Transport Assessment) are required to accompany planning applications for larger developments. It is for each local planning authority when preparing their Local Plan to establish what infrastructure is required to deliver the plan’s growth targets which in turn links to the setting of Community Infrastructure Levy (CIL) rates. Applicants should not be subject to any further burdens and it should be deleted.

User: Persimmon Homes

The policy is unsound in places because it is unjustified.

We share the HBF concerns that the more involved Design Review Process will slow delivery and is not compatible with achieving the London Plan's Housing Targets.

To deliver 65,000 dpa will require increased density of development, particularly on sites in outer London Boroughs. There needs to be recognition that whilst a designled approach is to be taken to optimisation, densities will increase and as a result there will be a discernible change in character to that existing.

User: Durkan

Policy D6 states that the density of development proposals should be based on, and linked to, the provision of future planned levels of infrastructure rather than existing levels. The supporting text is contrary to the policy wording and suggests that the capacity of existing and future public transport services, and the connections they provide, should be taken into consideration.

It is considered that this policy creates a dependency for development upon public funding and project timescales which holds much uncertainty and is outside of the developers' control. This is onerous and imposes external forces which can negatively impact on growth and certainty for a developer. There is also the case that development needs to come forward in the first instance to contribute to funds for infrastructure development through financial obligation. The robustness and feasibility of this policy is therefore questioned.

In addition to this, reliance on future planned infrastructure delivery could impose upon potential development unnecessary phasing to maximise benefits and thus result in unnecessary implementation of grampian conditions, which in turn negatively impact on viability and project timescales for developers, and leave emerging development schemes at the mercy of off-site works on sites which are not controlled by the applicant.

It is therefore suggested that the assumption for density of development to be based upon planned infrastructure should be clarified within Policy D6 and the supporting text.

User: Durkan

Policy D2 (Delivering good design) encourages LPA's to undertake an initial evaluation of the capacity for growth in boroughs and to identify the most efficient use of land. It encourages developing at densities above those of the surrounding area on most sites and that design of the development must optimise housing density to deliver homes. Policy D6 (Optimising housing density) states that proposed residential development that does not demonstrably optimise the housing density of the site in accordance with this policy should be refused.

Durkan supports this approach.

However, Policy D6 includes a requirement for a mandatory design review and the submission of a Management Plan where a development sits above the applicable density range. It is considered that this has the potential to significantly slow down the design development process, potentially resulting in a conflict of approach between officers and the external design panel, and ultimately could end up reinstating or incurring greater restrictions on density. Management plans would create a further hurdle for developers, and potentially slow down the delivery of housing and create additional costly burden.
The current London Plan's density matrix identifies minimum development densities, which can be helpful in setting a baseline approach to development. Therefore it is suggested that the density matrix should be retained in some form, and the requirement for developments to comply with a design review be removed.

It is suggested that the requirement for a mandatory design review and submission of a management plan should be removed from Policy D6 Part C. It is also considered that a form of density matrix be retained in the New London Plan to outline minimum development densities.

User: Croydon Limited Partnership

Policy D6 is concerned with housing density and states that development proposals must make the most efficient use of land and be developed at the optimum density giving consideration to the site context, connectivity, accessibility and the capacity of surrounding infrastructure.

To help assess, monitor and compare development proposals it is proposed that several measures of density will be required to be provided by the applicant, as well the preparation and submission of Infrastructure Assessments for major developments.

CLP would question the need for these additional requirements. It is considered that adding these onerous requirements to applicants could be detrimental to one of the overriding aims of the Plan to bring development forward in a timely manner. Whilst we fully support the principle of optimising density, we would respectfully request that these requirements are reconsidered.

User: Blackheath Society

Policy D6 Optimising housing density: Here too there is a very strong sense (for example in paragraph A) that ‘optimisation’ in fact means ‘maximisation’. We believe that would be an inappropriate direction for policy but if it what is meant, the language should clearly reflect that intention. The logic of paragraph B looks completely wrong. We are seeing in Lewisham over-development predicated on optimistic assumptions/forecasts regarding infrastructure. The implication of paragraph B (and para 3.6.3) is that developers and authorities should identify the ‘optimum’ scale of development then work towards overcoming infrastructure constraints. In fact, development should occur only on a scale commensurate either with infrastructure capacity that exists already or where there is a high level of certainty that it will be delivered.

User: Barnet Society

Policy D6 – Optimising housing density

We strongly agree with Section A that

The optimum density of a development should result from a design-led approach to determine the capacity of the site. Particular consideration should be given to:

1) the site context

2) its connectivity and accessibility by walking and cycling, and existing and planned public transport (including PTAL)

3) the capacity of surrounding infrastructure.

These are insufficient, however, in neighbourhoods like ours where significant areas of Green Belt and Metropolitan Open Space border – and often penetrate – the 800m-radius zones proposed by Policy H2. And while Para 4.2.7 prevents inappropriate densification within Conservation Areas, it says nothing about developments immediately outside their borders. Impact on views from, and towards, Conservation Areas and significant green spaces should therefore also be a consideration.

User: Kesslers Stratford Limited

Kesslers welcomes the Mayor’s revised approach to optimising housing density set out in Policy D6, which replaces the housing density matrix which has been commonly exceeded.

Supporting para. 3.6.2 states that it will not normally be necessary for minor developments to undertake infrastructure assessments, with the implication that major developments should undertake infrastructure assessments. This requirement is not justified. Infrastructure assessments (beyond what is currently undertaken in documents such as a Transport Assessment) are required to accompany planning applications and what is envisaged needs to be clearly set out. It is for each local planning authority when preparing their Local Plan to establish what infrastructure is required to deliver the plan’s growth targets which in turn links to the setting of Community Infrastructure Levy (CIL) rates. Applicants should not be subject to any further burdens particularly from a Strategic Plan.

User: Clarion Housing Group

The density matrix has been removed in favour of 'optimising housing density' and the idea of design- led planning, with design based scheme specific appraisals. Higher density which requires higher qualitative and design scrutiny.

Clause D6-A *"Residential developments that do not optimise density will be refused."*

The idea of design-led planning, and design based scheme specific appraisals is welcome but will require additional resources and upskilling of many Borough planning staff. Increased qualitative design scrutiny may increase the time required to consider applications.

Assessing the appropriate density for a site is an outcome of balancing physical factors, unit numbers, size, tenure mix, neighbourhood context as well as economic and financial ones. Compliance with all the other polices related to these factors may not be possible.

The reinstatement of a revised version of the density matrix is desirable both to ensure that new development achieves the overall balanced principles of Sustainable Residential Quality included in earlier plans, and to facilitate the Mayor's principles for Good Growth. The suggestion that the matrix continues to be used for initial discussion of density ranges is positive, yet its omission from the Plan undermines its status as a planning tool. Retaining the density thresholds as a minimum matrix could minimise opposition to development, particularly in outer London Boroughs. The density ranges for suburban areas could be reconsidered to aid intensification in suitable location (around transport hubs) in the outer Boroughs.

Clause D6-A Add: ***Table 3.2 Density Matrix from the current London Plan with revised suburban ranges.***

User: Clarion Housing Group

Clause D6-C

"*The higher the density of a development, the greater the level of scrutiny that is required of its design, particularly the qualitative aspects of the development design described in Policy D4 Housing quality and standards, and the proposed ongoing management."*

As densities increase the importance of good design and quality of build increases – if these are achieved then the success of higher density homes is more likely. Achieving quality of build should be a strategic objective.

Clause D6-C Add: ***and the quality of construction and components.***

User: Clarion Housing Group

Clause D6-C para 3.6.8

"Development proposals with a residential component that are referableto the Mayor must … submit a management plan if the proposed density is above"

- *110 units per hectare in areas of PTAL 0 to 1*
- *240 units per hectare in areas of PTAL 2 to 3*
- *405 units per hectare in areas of PTAL 4 to 6*

The requirement of management plans considering affordability, running costs and service charges for high density homes is very welcome. Yet increased density doesn't necessarily increase service charges as the greater number and mix of occupants changes the apportionments of charges achieving economy of scale. Naturally there are service costs associated with more complex M&E equipment or specialist equipment such as fire systems, which may increase with taller buildings. These will require a robust servicing regime and as such will be service chargeable. The thresholds above which applicants should submit a management plan relate solely to units per hectare and PTAL, not the other locational components of the density matrix.

Clause D6-C Clarify: ***Clarification of what management plans will contain is required.***

Clause D6-C Add: ***A similar approach to management plans would be considered best practice for schemes below the density / PTAL thresholds.***

Clause D6-CAdd: ***Management plan to take account of the housing design standards polices D4, H5, H7 and H12.***

User: Dagenham Dock Limited

Draft Policy D6 – Optimising housing density

DDL supports the principle of the Mayors approach to optimising housing density through a design-led approach to capacity on future development sites. Whilst it is understood that higher density development proposals will be subject to a greater level of design scrutiny, as established by Draft Policy D6C, it is again important that the Mayor acknowledges within Draft Policy D6 the difference between full and outline planning application submissions. The purpose of an outline application to secure development principles and parameters should not be lost within the London Plan. For sites of the scale of DDL's asset at Dagenham Dock, there should be means of securing high-density residential proposals, supported by appropriate Parameter Plans and Design Codes, without necessitating the submission of extensive detail required by a full planning application. Accordingly, DDL requests further clarification on how Draft Policy D6 will be implemented on larger, strategic outline schemes.

User: Footwork Architects Limited

Principle 2

Social infrastructure, both formal and informal, must be assessed and its value understood so that it can be protected where it exists, or provided for within new development plans and proposals

Description:

‘Informal' social infrastructure evolves and changes over time, the product of a thriving community, as diverse social networks, representing common interests, needs or age groups, are made and interact. ‘Formal’ social infrastructure is frequently confused with facilities and is too often determined by negotiation between developers and planners. However they are interdependent and must both be facilitated to ensure inclusivity and equality of opportunity.

Assessment:

Informal social infrastructure in existing communities is best identified from within, through local knowledge. Social infrastructure planning must then take account of it:

- A Social Infrastructure Survey to be conducted by or with local partners and accessing the range of social groups, including those considered hard to reach
- A Social Infrastructure Needs Assessment (as proposed in Policy S1 A) to be undertaken in the light of these informal networks and of identified local need, to ensure that proposals for new infrastructure are carefully aligned with it

Application:

Social infrastructure can only support local diversity and inclusivity if taken into account at the earliest opportunity, not left to be negotiated between developers and planners

- Neighbourhood Plans to view the Social Infrastructure Survey as a fundamental component of local consultation and planning; its inclusion should be a requirement
- Each borough to provide a Social Infrastructure Needs Assessment (as proposed at S1 A) within their Development Plan and Local Plan, clearly informed by local Social Infrastructure Surveys
- As with Social Needs, this requirement could be inserted at Policy D2, by dividing item ‘A’ into two parts. New ‘A’ to be an evaluation of socio-economic and well-being factors, heritage/ character and social infrastructure (currently points 1, 7 and 11); and new ‘B’ an evaluation of the data relating to physical and environmental factors (the remaining points)
- Supplementary Planning Guidance (SPG) on Social Infrastructure is being updated. The Social Infrastructure Needs Assessment to be a key component, so that it is referenced in all strategic and major development proposals. In turn these must specifically address local requirements and demonstrate how the infrastructure is to be delivered

[Policy D6: B 3
Policy S1: A, B, G; 5.1.1, 5.1.2, 5.1.3, 5.1.4, 5.1.5, 5.1.8, 5.1.9
Policy HC7: 7.7.1, 7.7.2]

User: Brent Cross Cricklewood Development Partners

Policy D6 is concerned with housing density and states that development proposals must make the most efficient use of land and be developed at the optimum density giving consideration to the site context, connectivity, accessibility and the capacity of surrounding infrastructure.

To help assess, monitor and compare development proposals it is proposed that several measures of density will be required to be provided by the applicant, as well the preparation and submission of Infrastructure Assessments for major developments.

The DPs would question the need for these additional requirements. It is considered that adding these onerous requirements to applicants could be detrimental to one of the overriding aims of the Plan to bring development forward in a timely manner. Whilst we fully support the principle of optimising density, we would respectfully request that these requirements are reconsidered.

User: Provewell Limited

Within the current London Plan, developments are limited to the density range outlined in the density matrix. The new draft London Plan proposes to remove this density matrix and seeks to use a design-led approach.

Provewell Ltd strongly supports the removal of the density matrix to allow greater flexibility for high density developments.

User: Aitch Group

We welcome the Mayor’s approach to optimising density and for the removal of the density matrix, which in some cases can set unnecessary ceilings on the development potential of a site.

However, it has also been my clients experience that the density matrix has been a useful tool in justifying higher densities during negotiations of applications at borough level.

It is critical that the intent of this policy is made clear to the boroughs and, consistent with comments expressed elsewhere within this letter, high density development should not be refused on subjective design grounds in sustainable locations unless there is a demonstrable impact on heritage assets or neighbouring amenity.

In relation to density calculations, we would strongly recommend that this is assessed on a habitable room basis rather than on a unit basis, because it provides a much more reliable indication of density. When assessed on a unit basis, housing mix can lead to a significant variation in actual densities. For example, a town centre site that provides a greater proportion of smaller units (consistent with other policies in the draft plan) could result in a higher density on a unit basis than a scheme with larger units. Density measured on a habitable room basis provides a finer grained analysis.

User:	Landscape Institute London

A - LI London is concerned that this section seems lacking and focuses too much on efficient land use and transport connections/ capacity. It is not stated whether infrastructure capacity or ‘’surrounding context’ include green infrastructure.

User:	London Borough of Ealing

The Council supports this policy and, in particular, welcomes the removal of the old SRQ density matrix and the new requirement for management plans being mandatory if certain density thresholds are met.

User:	Landscape Institute London
3.6.6 – The clause refers to shared amenity space and high-quality public realm, but does not mention proximity to public open space. Housing density (3.6.9 & 10) assessment is complicated	

User:	Landscape Institute London
Housing density (3.6.9 & 10) assessment is complicated.	

User:	Landscape Institute London
Housing density (3.6.9 & 10) assessment is complicated.	

User: Highgate Society

Object and comment

This section states that any development that does not optimise site density should be refused. In section D5, where the extremely small minimum space standards are set out, it says that developers will be encourages to exceed these standards. This appears to be a contradiction. In addition, it is completely counter to Principles of Conservation Area protection and would fatally undermine the ability of a community to secure appropriate development in a Conservation Area. We suggest that it would raise issues of Human Rights to prevent someone who wanted to build a small unit on their land from doing so.

Infrastructure capacity should be planned/amended to support proposed new densities. Infrastructure should include facilities such as nurseries, schools, medical centres, corner shops and rubbish bins as well as public transport and parks.

If a minor developments will not have to undergo infrastructure assessments, is there a mechanism for assessment the cumulative impact?

This section states that any development that does not optimise site density should be refused. In section D3, where the extremely small) minimum space standards are set out, it says that developers will be encouraged to exceed these standards. This appears to be a contradiction.

Infrastructure capacity should be planned/amended to support proposed new densities. Infrastructure should include facilities such as nurseries, schools, medical centres, corner shops and rubbish bins as well as public transport and parks..

If a minor developments will not have to undergo infrastructure assessments, is there a mechanism for assessment the cumulative impact?

D6D – Support

An assessment of density based on habitable rooms, bedspaces and bedrooms is welcome. A unit based density calculation does not accurately give an assessment of the number of people living on the development. For instance a site with a majority of 1 and 2 bed units will have considerably fewer demands on infrastructure and amenity than of with a majority of 3 and 4 bedrooms.

D6E Comment

This policy requests various measures of density be provided but offer no prescriptive targets so it is not clear how this information will be assessed. It appears to be a data collection mechanism.

User: Peabody

1. We welcome the Mayor’s ambition to increase density and make optimum use of land as this will be key to addressing housing need in London. We do not oppose the removal of the density matrices. However, we do query whether the Draft Plan’s policies are strong enough to encourage building at higher densities. In fact, in many places the Draft Plan seems to contradict itself by placing an emphasis on buildings that match “local context”, or additional restrictions on regeneration opportunities, while requiring high density. We echo London First’s concerns that the Draft Plan does not include sufficient safeguards to prevent conservatively low densities.
2. We would like assurances that the design-led approach will not be overly complex or focused on minor details, resulting in delays during the pre-application process – especially given that “the higher the density of a development, the greater the level of scrutiny that is required of its design”.

User: Ballymore Group

Overall, Ballymore welcomes this new draft London Plan as an innovative and ambitious document. They strongly support the Mayor's approach to encouraging more homes to be built across London and the majority of the mechanisms through which to deliver them.

The Mayor's London-wide target within Policy H1 of 64,945 homes per annum (increased from 42,389 homes per annum under the current London Plan) demonstrates an ambitious target which will help provide a range of housing choice. His objective within Policy D6 of making the most efficient use of brownfield land in accessible locations through a design-led approach is the best way of delivering more homes and one that Ballymore have championed for many years.

However, as an experienced property developer Ballymore does have concern about the wording of certain policies in terms of their practical implementation and the restraints they are likely to impose on housing delivery.

User: Natural England

Existing greenspace and newly provided greenspace will need to be designed to cater to higher densities of people, providing very high levels of accessibility whilst minimising impacts on biodiversity. Good design can drive both better use of green space, and better resilience of biodiversity within greenspace to additional recreational pressure. Therefore, we recommend that an additional paragraph is incorporated into the supporting text below 3.6.5 to read: ‘’The capacity for existing greenspace to absorb increased pedestrian density should be assessed through development, and design alterations made where necessary to improve accessibility and minimise the impact of recreational disturbance on biodiversity. New greenspace provided through development should also be designed so as to as to support high accessibility whilst also providing high levels of biodiversity.

We acknowledge that the scale of development needed to meet housing demand is likely to lead to the changes in the character of certain areas within London. The emphasis on small sites through this Draft Plan in particular may lead to increased density of housing. However, continuity of or improvements in character (where this would not be to the detriment of established local -communities) should be sought wherever possible. We would encourage the Plan to consider the use of the Townscape Character Assessment methodology where there are concerns about changes in character resulting from densification.

User:	London Chamber of Commerce and Industry

Policy D6 Optimising housing density

52. As highlighted previously, increased density in areas with maximum potential for utilising existing infrastructure is a positive means for boosting housing delivery.

53. Whilst density will boost the supply of housing in the capital, this is not the silver bullet to the chronic shortage of housing. Increasing housing density should be carried out in concert with other approaches to delivering housing including a “limited intervention” of building on the Green Belt, as noted in our Brown for Blue report.

User:	Chairs of Camden's Conservation Area Advisory Committees

D2 A7 We welcome this clause.

D2 D Design Codes General 1: we are concerned by the reference to Design Codes and their effectiveness. There must be concern that the NPPF's statement (36) that design codes should 'avoid overly prescriptive detail' may make them an inadequate mechanism for managing density (**D6**) in complex and sensitive heritage areas. See also policy **H2 B 2**.
General 2: We are also very concerned over who prepares Design Codes. They need to be undertaken transparently in collaboration with local communities to be consistent with the Mayor's objectives.
Our proposed amendments – reasoning: To achieve effective policy implementation, and consistency with the Mayor's objective of working collaboratively with local communities.
Our proposed revised text: to ADD 'Design Codes should be prepared by Boroughs transparently and in collaboration with local communities, respecting local distinctiveness, and preserving and enhancing heritage assets.'

D2 G 4 Draft policy: 'design review recommendations are appropriately recorded and communicated to officers and decision makers'
Our proposed amendments – **reasoning**: to ensure consistency with the requirement for transparency at D2 G 1. Our experience is that, while design review is welcome, it lacks transparency, and is not open to scrutiny. Our amendment seeks to address both the means of better achieving high quality design, and the need to build trust in democracy.
Our proposed revised text: 'design review recommendations are appropriately recorded and communicated to officers and decision makers, and made public for scrutiny in good time before officers' recommendations are prepared.'

User: CIBSE

We support the principle that development should take account of existing infrastructure, including transport accessibility but also other infrastructure needs, including accessible green space. Opportunities for improvements should also be taken into account.

The detailed implications of delivering high housing densities are not CIBSE's core expertise; in particular, we note concerns expressed by professionals about the notion of "optimising density" (what are the criteria to define the optimum, and how context-dependent is it?), but we do not feel in a position to comment in detail ourselves. However, density can have a strong impact on the achievement of other core objectives, including environmental, health and wellbeing objectives, and there are concerns about a potential conflict between the current density objectives and others such as daylight / sunlight in housing (policy D4-F), outdoor amenity (policy D7), green infrastructure (policy G1) and urban greening (policy G5). We therefore agree with D6-D i.e. that schemes of high densities should be subject to strong scrutiny. We also think the policies in potential conflict should be strengthened, as detailed in our response to these policies.

We note that a recent independent report6 reviewed whether high-density housing schemes could be delivered that were manageable, financially viable AND met other essential objectives such as daylight / sunlight and access to amenities and green space. They concluded with a warning against densities above 350 dwellings per ha, with exceptions only if subject to rigorous impact testing. If the policy goal of 405 dwellings per ha is retained, we would strongly recommend that schemes are subject to a high level of evaluation coupled with access to advice and guidance at an early stage, and we would encourage the Mayor's team to provide examples of how such densities can be achieved while also meeting the Mayor's other essential objectives, including urban greening, access to open space, reducing overheating risks and delivering appropriate daylight/sunlight levels.

As noted in our response to policy D4, we are aware of alternative approaches being proposed for daylight/sunlight access at high densities7; we do not think there is currently enough consensus on this issue and are wary that this would place even more reliance on robust design reviews and local authorities resources. We do not therefore feel in a position at this stage to advocate these alternative approaches until it is clear whether they are appropriate technically and in the London development context.

User: DPDgroup UK Ltd

Policy D6 - Optimising housing density and Policy H1 – increasing Housing Supply

DPD recognise the challenges London faces in housing its growing population as supply and demand lead to price increases. This growth however increases demand and the number of parcels needing to be delivered to an area. This change subsequently leads to an increase in number of vehicles on the road, and a change in the vehicle route delivery profile. Increased density reduces the ‘in-patch’ delivery area but the ‘stem mileage’ from the depot remains the same. Moving B8 space further away from these locations reduces productivity and therefore increases the number of vans on the road.

User: Aberdeen Standard Investments

Policy D6 – Optimising Housing Density

We strongly support part B1 of the Policy which links the density of proposed development on the future planned levels of infrastructure rather than existing levels.

Notwithstanding this, we are concerned regarding Parts D & E of the Policy which seek seven separate measures of density. We do not consider this level of information is required to assess an application in terms of density at a strategic level. We consider Part E of the Policy should be deleted as this information is not required to assess the appropriateness of the density of a development scheme.

User:	Design Council

Density and Design
20. In the pursuit of housing targets and optimising density it is crucial to ensure that the homes built respond to people's needs. We welcome the proposed policy shift set out in
Policy D6 to a design led approach to determining the density for development on sites. The policy highlights particular consideration of i) the site context, ii) its connectivity and accessibility and iii) the capacity of surrounding infrastructure.

User:	Design Council

We recommend the inclusion of ‘people’ as a fourth key consideration in determining the capacity of a site, to ensure that a consideration of who will live in and near to a development informs how its design, including its density, is determined. This cannot be derived purely by reference to a site’s existing context, connectivity or infrastructure. The London Plan should promote not just the optimum housing volume but housing development that drives well-designed places that meet our changing needs and addresses societal challenges, such as poor health and social inequality, as set out in our response to the Housing White Paper. Designing for people is clearly addressed elsewhere in the plan but it is vital its is explicitly stated in this key policy to have real impact (Policy D6).

User: Sustrans

D6 A 2

We support the requirement that consideration is given to sites' connectivity by walking and cycling when determining the optimum density and urge Transport for London / GLA to develop a tool to support this process.

D6 B 2 & 3

We welcome the requirement to plan improvements to infrastructure capacity and accounting for the role of active travel (2) in supporting densities; and (3) that infrastructure capacity improvements, including walking and cycling networks, should be developed and phased accordingly.

D6 C

We welcome the retention of the principle that public transport accessibility and density remain linked, and to require management plans when densities exceed certain thresholds according to PTAL scores. This is required to continue to reduce car dependency and ensure new development does not increase car use.

User: Gravesham Borough Council

Density
The plan proposes to remove the density matrix approach in favour of ‘optimising housing density’. We understand that the primary reason for the removal of the matrix is because it has been applied too rigidly by boroughs. A site by site design-led approach is suggested with accessibility, including proposed infrastructure improvements, walking and cycling, all being relevant considerations (pg117).

It states that residential developments that do not optimise density will be refused and, in order to measure density, all schemes are to provide number of units, habitable rooms, bedrooms and bed spaces per hectare (p117-118). However, the plan also notes the higher the density of a development, the greater the level of scrutiny there will be on the design (p118).

Of the overall total the SHMA suggests that 55 per cent of these, or 36,335, should be one-bedroom units despite concerns about overcrowding. In response, the draft new Plan does not include a target for the number of bedrooms in new housing developments, instead referring boroughs to the SHMA and to assess based on local need.

There does seem to be widespread support for a design-led approach to development sites. At the same time there is concern that this approach will always require higher densities. Paragraph 3.6.1 says “For London to accommodate growth in an inclusive and responsible way every new development needs to make the most efficient use of land. This will mean developing at densities above those of the surrounding area on most sites. The design of the development must optimise housing density…”

It has been suggested that, in reality, taking the local context and character into account, as required by other draft policies, may not lead to higher density development being the optimal solution for every site.

Also design-led scenarios will take resource, and this could cause problems with the speed of delivery needed.

User:	Sustrans

3.6.3 – 3.6.6 inclusive

We support the approach outlined in these paragraphs and would welcome the identification of financial contributions and joint working with TfL as a mechanism for the delivery of Healthy Streets Approach and improvements to active travel infrastructure.

User:	Sustrans
Opportunities to improve these connections to support higher density development *and the potential to improve them, through joint working with* *TfL or financial contributions*, should be identified.	

User: Hornsey & Wood Green Labour Party

The emphasis here is the most efficient use of land, using different measures concerning optimum density, the requirement for good design and we support the taking into account existing and future public transport services. Public transport needs to be in place before development to reassure prospective residents that they do not need a car.

Policy D6 needs to be amended to avoid a lack of associated public infrastructure, and excessive housing densities and ‘town cramming’.. Proposed changes: The phrase ‘in exceptional circumstances’ should be deleted from the last sentence in Policy D6B 3) so that it reads ‘This may mean that development is contingent on the provision of necessary infrastructure and public transport services…’. The density levels specified in Policy D6C should be amended to 80, 170 and 260 units per hectare respectively so that it reads: ‘ 1) 80 units per hectare in areas of PTAL 0-1; or 2) 170 units per hectare in areas of PTAL 2 to 3; or 3) 260 units per hectare in areas of PTAL 4 to 6’.

User:	Thames Valley Housing Association

Policy H4 ‘Housing quality and standards’ and paragraph 3.4.8 to maximise tenure integration is supported, as is Policy D6 ‘optimising housing density’.

User:	Ruth Blair

To prevent development of sites without sufficient density all applications with sub optimal density are to be refused. This appears to mean that any house not converted to flats would be automatically refused planning permission regardless of the application’s significance, merit, desirability or public benefits and effectively puts a hold on any changes to a large percentage of London’s housing stock.

User: Mr Gary Hayes

Policy D6 Optimising housing density Previous London Plan density policies, which have promoted higher density linked with better transport connections, have asserted that ‘lower density development is generally most appropriate for family housing’ (as if families don’t also need good public transport connections).

This has resulted in a predominance of one and two-bedroom homes, almost to the exclusion of family sized dwellings, in areas with good transport connections. High percentages of above density matrix level developments have consistently been approved, often, we observe, that lack the amounts of green, play and social infrastructure needed.

We feel that a range of properties sizes that meet the full range of household sizes should be developed across London. Every development should contain the levels of green, play and social infrastructure required as part of delivering lifetime neighbourhoods.

We don’t support D6 policy’s requirement that density should be optimised in each development’. We feel this presents an expectation of over-development (particularly of smaller dwelling sizes) - all apparently acceptable by being cloaked in a charade of ‘good design’

We propose that the Mayor produce a more sophisticated matrix that facilitates development with densities that accommodate a full range of dwelling sizes, adequate levels of green, play, youth and community infrastructure and access to affordable leisure facilities, shops, services and amenities for any development. This should be based on delivering lifetime and walkable neighbourhoods.

User: Councillor for Coulsden East Ward, LB Croydon

The removal of the density matrix, which sets limits on housing density.

The density matrix should be re-instated to ensure that new development suits local character and is at an appropriate level for the surrounding area.

The vague guidance that is now being proposed will allow developers to have free rein in the development of sites, without reference to character or suitability.

User:	Landsec

D6 part C, Density and PTAL: We believe it would be helpful if this policy could refer to policy D6 A2 which acknowledges that other forms of sustainable transport can also be considered by LPA's when considering proposals that increase densities (i.e. not just PTAL). Para 3.6.5 offers some clarification regarding 'active modes'. Policy H1 2c also implies wider discretion. Great clarity and consistency on this point would be helpful and promote innovation to deliver greater numbers of new homes.

User: Mr Michael Edwards

This submission argues that policy *D6 Optimising housing density* is a dangerous mistake. It would remove all numerical controls or advisory upper limits on the density of new housing schemes and would instead regulate density using a 'design-led' approach. Developers would be expected to negotiate with planners in each of the boroughs.

Developers decide how much to bid for a site by residual valuation: estimating the disposal value of whatever they will be permitted to build and deducting their expected costs to reach their sensible bidding limit. The 2 main factors a London housing developer needs to anticipate are the density of the scheme and the percentage of social / 'affordable' housing which will be required. If the development plan is clear about both factors and these policies are expected to be enforced then developers will make sensible bids for sites. If the development plan is imprecise or flexible or if the planning authorities are known not to enforce its provisions then developers will tend to bid too much for sites in the expectation that they can recoup their profitability by negotiating relaxations, often citing 'viability' constraints. This will encourage land price escalation.

Elsewhere (in the context of affordable housing requirements) the draft Plan accepts the importance of discouraging developers from over-bidding and creating land price rises “based on hope value” (§ 4.6.13) but the same logic is not applied to density controls. This is inconsistent and a great mistake. It will lead to land price escalation and thus to worsening affordability problems in the entire London housing market and for non-profit producers when they buy sites. Upper limits on density should be retained and enforced.

A revised version of the 2016 density matrix has been proposed by Duncan Bowie in his submission and valuable work was done by GLA and TFL last year to refine the PTAL accessibility measures and take account of bus and train service capacity. The Just Space Community-led Plan proposes that density controls take account of social infrastructure capacity. If a more sophisticated version of the matrix cannot be brought forward in time for for the EiP I would support retention of the 2016 matrix for use in boroughs which have not yet completed acceptable Design Codes (policy H2B(2)) which in turn would have to include transparent density limits.

For the avoidance of doubt

1. Nothing in the density matrix prevents the good design which the draft Plan is so keen to encourage. Indeed it fosters the clustering of denser settlement in pedestrian-friendly configurations where accessibility is best. Architects and other designers can do brilliant work within density limits.

2. This submission is not an argument for any particular level of density.

3. Is this all I have to say about the draft Plan? No, but I am privileged to be able to contribute, along with colleagues and students, to other submissions on wider sets of topics, notably Just Space and the Highbury Group.

User: Redrow Homes London Division.

Table 3.2 of the adopted London Plan provides a matrix which indicates density ranges. In practice roughly half of schemes have exceeded these ranges. This though is consistent with England's discretionary planning system which does not produce code-based decisions but pursues planning objectives on a case-by-case basis.

The adopted London Plan is clear on this when it states as follows:
'It is not appropriate to apply Table 3.2 mechanistically. Its density ranges for particular types of location are broad,enabling account to be taken of other factors relevant to optimising potential – local context, design and transport capacity are particularly important, as well as social infrastructure (Policy 3.16), open space (Policy 7.17) and play (Policy 3.6).' (paragraph 3.28)

In contrast, Policy D6 provides no numerical guidance on appropriate density ranges. Without a minimum to refer to it will become more difficult to explain to Londoners the sitespecific factors leading to proposed densities.

The 'density matrix' has provided a useful baseline. It should be retained but revised to reflect the density levels required in order to meet housing need, especially at more suburban locations.

This exercise should recognise that roughly half of referable schemes have typically exceeded the current matrix. It should draw from case studies in situ.

The supporting text should again make clear that the matrix provides guidance only and that appropriate decisions regarding density should be made on a case-by-case basis.

Failure to provide guidance on this matter seems likely to lead to sub-optimal outcomes and/or delayed decision-making.

User:	Redrow Homes London Division.

This paragraph does not directly refer to this but is set out in the supporting text to Policy D6.

The London Plan must be clear that planning documents and especially supplementary planning guidance must not prescribe densities.

Any such approach would be inconsistent with England’s discretionary planning system and seems likely to deliver suboptimal outcomes.

User: Cllr Richard Chatterjee

The removal of the density matrix, which sets limits on housing density

The density matrix should be re-instated to ensure that new development suits local character and is at an appropriate level for the surrounding area.

The vague guidance that is now being proposed will allow developers to have free rein in the development of sites, without reference to character or suitability.

User:	Mr Ian Leonard

1. the removal of the density matrix, which sets limits on housing density,

User: Cllr Richard Chatterjee

Policy D6 Optimising housing density

Development proposals must make the most efficient use of land and be developed at the optimum density. The optimum density of a development should result from a design-led approach to determine the capacity of the site. Particular consideration should be given to:

1) the site context

2) its connectivity and accessibility by walking and cycling, and existing and planned public transport (including PTAL)

3) the capacity of surrounding infrastructure.

Proposed residential development that does not demonstrably optimise the housing density of the site in accordance with this policy should be refused.

Comment:

The Policy D6 statement ‘Proposed residential development that does not demonstrably optimise the housing density of the site in accordance with this policy should be refused’ is subject to interpretation and cannot be enforced as there are no defined parameters

to define the methodology of ‘optimising housing density’… There is no quantifiable measure of optimising the housing density.

Recommendation:

In the absence of the Density Matrix, detailed guidance on housing density relative to local character, current and proposed PTAL, is required to be defined in the New London Plan if this policy statement is to have any meaning.

Reinstate the Density Matrix.

Policy D6 Optimising housing density

The following measures of density should be provided for all planning applications that include new residential units:

1) number of units per hectare

2) number of habitable rooms per hectare

3) number or bedrooms per hectare

4) number of bed-spaces per hectare.

Comment:

D 2)

Many new residential developments have open plan accommodation for kitchen area, breakfast room, dining area and lounge accommodation etc.

This allows usable development area savings on partitioning and doors and can improve the living environment for occupants. It is not therefore possible to indicate the distinct number of ‘habitable rooms’ in such situations. In these circumstances, the actual habitable living area in square metres per residential unit should be provided.

Recommendation:

It should be a requirement that all proposed developments should include the actual ‘habitable living area’ in square metres per residential unit and that this parameter be included in Table 3.1 - Minimum space standards for new dwellings.

User: Cllr Richard Chatterjee

3.6.1 For London to accommodate growth in an inclusive and responsible way, every new development needs to make the most efficient use of land. This will mean developing at densities above those of the surrounding area on most sites.

These built form and massing measures should be considered in relation to the surrounding context to help inform the optimum density of a development.

Comment:

This statement will allow aggressive developers to ignore local character; the only measure of density of the surrounding area is units per hectare as the residential density (habitable rooms per hectare) for the locality is unknown. What would be considered as an appropriate measure of increase in housing density above that of the surrounding area would be acceptable?

How can the local housing density be determined by an agreed methodology?

Recommendation:

A methodology of determining a local area of specified radius or area to allow calculation of the local housing density/hectare for that area should be determined such that an acceptable percentage increase for new developments could be determined for that locality. Without guidance this policy statement at 3.6.1 is meaningless.

Reinstate the Density Matrix.

User: Cllr Richard Chatterjee

Para 3.6.9:

3.6.9 Housing density has been measured and monitored in London over recent years in units per hectare (u/ha). Average density across London of new housing approvals in the monitoring year 2015/16 was 154 u/ha with the highest average density being recorded in Tower Hamlets at 488 u/ha. However, comparing density between schemes using a single measure can be misleading as it is heavily dependent on the area included in the planning application site boundary as well as the size of residential units. Planning application boundaries are determined by the applicant.

These boundaries may be drawn very close to the proposed buildings, missing out adjacent areas of open space, which results in a density which belies the real character of a scheme. Alternatively, the application boundary may include a large site area so that a tall building appears to be a relatively low-density scheme while its physical form is more akin to schemes with a much higher density.

Comment:

Adjacent areas of open space are for existing local residents' usage and should not be considered as part of a proposed development if not included within the site boundary. The site area, in hectares, is determined by the ownership of the site and as defined by Land Registry. Any proposed development on such a site is constrained by the actual boundaries of ownership. Thus, the density of any residential dwelling(s) within that site is restricted by those boundaries and should not be influenced by adjacent or local open green space.

The character of an area is defined ostensibly by the housing density of the locality. This can be ascertained by the actual area as defined by the street boundaries as configured and the number of dwellings within that bounded area, related to that area in units per hectare.

What percentage increase in housing density would therefore be appropriate for a suburban residential location at a specific PTAL?

Recommendation:

Define the acceptable percentage density increase in units/hectare as related to the surrounding locality density in units/hectare in order to retain some semblance of the character of a locality.

Reinstate the Density Matrix.

User: Simon Brew

The removal of the density matrix, which sets limits on housing density.

The density matrix should be re-instated to ensure that new development suits local character and is at an appropriate level for the surrounding area.

The vague guidance that is now being proposed will allow developers to have free rein in the development of sites, without reference to character or suitability.

User: Prof Michael Hebbert

I am concerned at the omission of the Density Matrix from Policy D6 of the Draft New London Plan. The matrix is the most recent of a very long sequence of London-wide density policies that have shaped the city's fabric under the aegis of the Mayor and GLA, LPAC, GLC and LCC. Though deficient in many respects the matrix has continued to inform the property market and provided a dampener on land speculation. Setting density parameters is a vital responsibility of metropolitan government in all large cities and experience shows it can't be done ad hoc on a site-by-site basis. Providing a London-wide framework is perfectly compatible with encouraging high design values that respond to site context, connectivity and infrastructure capacity: in fact design-led development is more likely to succeed when underpinned by clear, equitable, predictable density regulation. Conversely, deregulation will encourage speculative over-bidding for sites, with consequences already all too evident around London in diminished social/affordable housing contributions and smaller units with reduced levels of sunlight, daylight, storage and play-space. So Policy D6 of the Draft New London Plan proposes a step in the wrong direction: please don't remove the Density Matrix, improve it.

User: Sainsburys Supermarkets Ltd

We support the Mayor’s overall aspiration in seeking to make the most efficient use of land and ensuring that proposals be developed at the optimum level.

As mentioned previously, Sainsbury’s has a strong track record of delivering successful high density mixed-use schemes in London, integrating retail and residential uses. Our schemes demonstrate that high density sustainable development, mixed-use and high quality design can successfully co-exist. Our approach to design can ensure the successful integration of what were historically considered incompatible uses, such as retail and residential. An innovative approach, with understanding from all parties at the design and planning stage, can screen out potential design issues, such as noise from servicing.

We would, therefore, encourage the Mayor to adopt a more flexible approach to housing density, to ensure that schemes can deliver development which remains compatible with and sympathetic to the surrounding area. By allowing a more flexible and pragmatic approach, which is less reliant on formulaic indicators such as PTAL rating, this can greatly increase the potential for innovative and creative design approaches to come forward.

Similarly, there must to be recognition of the relationship between density and affordable housing provision (quantum and tenure split). In short, if the Mayor is introducing the 35% affordable housing threshold, this will potentially have a negative impact upon the viability of schemes. To respond to this, the DLP will need to contain greater flexibility regarding density to ensure schemes remain viable.

User: Mr Drew Stevenson

The abandonment of density guidelines in the Plan takes us into new territory and will lead to outcomes that are difficult to foresee.

The basic philosophy of the policy is that the development capacity of a site should be “optimised” (Policy D6). Whilst the capacity must be assessed (Policy D2) under the heading of Good Design, the “outcome of this process must ensure the most efficient use of land is made so that development on all sites is optimised” (Policy D2B). Para 3.6.1 makes clear that “This will mean developing at densities above those of the surrounding area on most sites.” The reference to “on most sites” gives a clear lead to the way in which the capacity assessments are to be carried out. (The is re-enforced by Policy H2D on small sites with the presumption in favour of development in defined circumstances.)

Attempts to capture the resulting hope value will be bound to push up the density of applications “on most sites” - but to what levels is unclear. Curiously, Policy D6C says that “The higher the density of a development, the greater the level of scrutiny that is required of its design..” This, in principle, leaves the decision on density to subjective judgement, with more scrutiny and uncertainty as an applicant increases density to achieve the optimum use of the site. So, the more an applicant seeks to achieve the objective of the policy (optimisation) the greater the hurdle that is put in their way.

This is conceptually the opposite of the affordable housing policy, where the more one seeks to meet policy and increase affordable housing, the smaller the hurdle that has to be overcome through the threshold test.

As I say, I am not sure what the precise implications will be. In theory, the increase in permitted density will increase the value of land to the land owner, but may still reduce the price per unit to the developer. This will further complicate the sums to be done in assessing viability.

User: Andrea Carey Fuller

Previous London Plan density policies, which have promoted higher density linked with better transport connections, have asserted that ‘lower density development is generally most appropriate for family housing’ (as if families don’t also need good public transport connections). This has resulted in a predominance of one and two-bedroom homes, almost to the exclusion of family sized dwellings, in areas with good transport connections.

High percentages of above density matrix level developments have consistently been approved, often, we observe, that lack the amounts of green, play and social infrastructure needed.

We feel that a range of properties sizes that meet the full range of household sizes should be developed across London. Every development should contain the levels of green, play and social infrastructure required as part of delivering lifetime neighbourhoods.

We don’t support D6 policy’s requirement that density should be optimised in each development’. We feel this presents an expectation of over-development (particularly of smaller dwelling sizes) - all apparently acceptable by being cloaked in a charade of ‘good design’

We propose that the Mayor produce a more sophisticated matrix that facilitates development with densities that accommodate a full range of dwelling sizes, adequate levels of green, play, youth and community infrastructure and access to affordable leisure facilities, shops, services and amenities for any development. This should be based on delivering lifetime and walkable neighbourhoods.

User: New City College

Chapter 3 deals with design. Policy D6 covers housing density, and we are supportive of the proposed designled approach to determine the capacity of sites. Assessment based on the connectivity and the capacity of surrounding infrastructure makes good sense and will enable higher density development in suitable locations. Although New City College consider local context to be an important factor in design development they do not believe it should not be the only factor. There are many good reasons why a development might appropriately be of a scale that is significantly larger than its local context without having a harmful impact. They therefore believe that policy D6 A 1, does not give sufficient examples of what should be taken into account to determine the capacity of a site. In their view, it would be important to take into account the townscape opportunity of the area, and the potential for 'place creation' which could tie in with, for example, the proposed policy D8 which notes that tall buildings can support legibility, enable easier navigation and can become a valued part of London's city scape. Indeed, guidance notes that some developments will be at a scale that will enable them to define their own context and the regeneration of Poplar, north of Aspen Way, is one such opportunity.

Below is a proposed change to Policy D6:

Policy D6 Optimising housing density
D6
A. Development proposals must make the most efficient use of land and be developed at the optimum density. The optimum density of a development should result from a design-led approach to determine the capacity of the site. Particular consideration should be given to:
1. the site context
2. its connectivity and accessibility by walking and cycling, and existing and planned public transport (including PTAL)
3. the capacity of surrounding infrastructure.
(insert)
4. Opportunities presented by the existing townscape
5. Opportunities for place creation

User:	Oneill Homer

D6 There will be appropriate and inappropriate locations and means of delivering small sites and of achieving higher densities in any local area. Neighbourhood plans can lead the design review process to identify the spatial options to achieve this objective and to make the necessary trade-offs to find small sites and enable higher densities. Local Plans will struggle to do this same job, given the Boroughs' limited resources and the likely local political resistance if local communities do not feel they are properly being involved in finding solutions.

User: L&Q

Density matrix

Table 3.2 of the adopted London Plan provides a matrix which indicates density ranges. In practice roughly half of schemes have exceeded these ranges. This though is consistent with England's discretionary planning system which does not produce codebased decisions but pursues planning objectives on a caseby-case basis. The adopted London Plan is clear on this when it states as follows: 'It is not appropriate to apply Table 3.2 mechanistically. Its density ranges for particular types of location are broad, enabling account to be taken of other factors relevant to optimising potential – local context, design and transport capacity are particularly important, as well as social infrastructure (Policy 3.16), open space (Policy 7.17) and play (Policy 3.6).' (paragraph 3.28) In contrast, Policy D6 provides no numerical guidance on appropriate density ranges. Without a minimum to refer to it will become more difficult to explain to Londoners the sitespecific factors leading to proposed densities.

The 'density matrix' has provided a useful baseline. It should be retained but revised to reflect the density levels required in order to meet housing need, especially at more suburban locations. This exercise should recognise that roughly half of referable schemes have typically exceeded the current matrix. It should draw from case studies in situ. The supporting text should again make clear that the matrix provides guidance only and that appropriate decisions regarding density should be made on a case-by-case basis. Failure to provide guidance on this matter seems likely to lead to sub-optimal outcomes and/or delayed decisionmaking.

User: L&Q

Use of masterplans and strategic frameworks in relation to density

This paragraph does not directly refer to this but is set out in the supporting text to Policy D6.

The London Plan must be clear that planning documents and especially supplementary planning guidance must not prescribe densities. Any such approach would be inconsistent with England’s discretionary planning system and seems likely to deliver suboptimal outcomes.

User: dp9

Policy D6 – Optimizing housing density

Part C states that a management plan should be submitted for developments that exceed the density thresholds identified in the policy. Paragraph 3.6.8 identifies what this management plan should contain. It is not clear why this management plan is required or how the information it requests, including running costs and service charges, can be known at the planning application stage. Some of the information is already required in any event. We do not consider that the affordability of services has any relevance to the density of a development, and as such object to the requirement to provide these management plans. The density of a development should be assessed at planning application stage, and only approved if it can be justified in design terms – noting that density is just one characteristic of a development and should not be considered in isolation from other issues such as design quality, residential amenity and impacts on the surrounding environment.

Part D identifies the measures of density that should be submitted with an application. However, these are not appropriate for mixed-use developments.

We consider that Part E is too prescriptive. These measures will vary greatly from site to site and without a guide as to what is appropriate in each urban context, there is significant potential for such measurement approaches to unduly constrain or shape development.

RECOMMENDATION: Delete the requirement to submit a Management Plan from Part C. Amend Part D to identify how these requirements relate to mixed-use development. Delete Part E.

User: Taylor Wimpey UK

Policy D6 Optimising Housing Density

We support proposals that encourage the most efficient use of land.

The Policy and supportive text however fails to have regard to the need for developments to reflect market demand. Developments must also be viable to ensure they come forward to meet the identified need for housing over the plan period.

Part B of the Policy states that the density of development proposals should be linked to,the provision of future planned levels of infrastructure rather than existing levels. This may require the phasing of development to reflect the future delivery of supporting infrastructure.

Unless there was a guarantee that future infrastructure would be delivered; available funding; requisite planning and other permissions; control over land required to deliver the infrastructure; and certainty over timing, it would be extremely difficult for applicants to commit to such schemes.

It is not always possible to purchase land in traches, and acquiring land with little or no comfortt hat it could be developed in the future, is unlikely to be viable for the purchaser or the seller if such risks resulted in a land value below their expectations. Secondly, if land was purchased in phases, to create sustainable communities, both the developer and home owners would want the infrastructure to come on-line as soon as possible to ensure good place making and minimise future disruption associated with delivering infrastructure.

One ofthe problems with the current Community Infrastructure Levy is that developers are unable to rely on Councils to deliver infrastructure, even though they have contributed towards it through their CIL payments.

Developers need the comfort and certainty that infrastructure will be delivered if it is necessary to support the development proposals.

Para 3.6.8 Management Plans

It is unreasonable to expect applicants to provide detailed management plans to councils at planning application stage. This level of detail is overly onerous and at an early stage in a development's planning, with no certainty of positive outcome is unlikely to lead to increased cost and time delay without material benefit to the planning decision outcome. This will be particularly the case at Outline Planning Application Stage where layouts may be illustrative and details such as appearance, access, landscaping, layout and scale reserved for approval at a later planning stage.

User: Aberfeldy New Village LLP

Policy D6 Optimising Density

We support the overarching aim of this policy, to make the most efficient use of land. However, the policy should be clearer in explaining that the mayor is seeking a major step change in the delivery of housing and business space and that increases in density will be necessary to achieve this.

Part A of policy D6 should be amended to make clear that higher density development will be expected in town centres, close to transport nodes, in opportunity areas and on major regeneration and redevelopment sites. It should be amended as follows

"Development proposals must make the most efficient use of land and be developed at the optimum density. ***Higher density development will be expected in town centres, close to transport nodes, in opportunity areas, housing zones and on major regeneration and redevelopment sites.*** *The optimum density of a development should result from a design-led approach to determine the capacity of the site."*

The draft Plan sets out an overarching ambition for significantly increased densities. This change is necessary to make the policy effective as it must be clear where significantly higher densities are envisaged, otherwise this cannot be clearly interpreted by Local Plan makers and decision-takers.

We also consider that the policy should provide further guidance on what would constitute optimum densities. They Mayor may wish to consider setting minimum densities. In particular for areas where substantial new development is encouraged such as opportunity areas, housing zones and major regeneration sites, the supporting text should explain that the Mayor expects development in these areas to significantly increase housing densities in order to facilitate the delivery of the draft Plan.

User: London and Continental Railways

Draft Policy D6 states that development proposals must make the most efficient use of land and be developed at the optimum density, and consequently any proposals that do not demonstrably optimise the housing density of a site should be refused. According to the draft policy, this optimum density should be the outcome of a design-led approach to ascertain the capacity of the site. Particular consideration should be given to:

1 "The site context;

2 Its connectivity and accessibility by walking and cycling, and existing and planned public transport (including PTAL);

3 The capacity of surrounding infrastructure".

As set out under part B 1) of the draft policy, the density of development should be based on, and linked to, the provision of future planned levels of infrastructure, rather than existing levels. This approach is supported as it is vital to make full use of the future public transport improvements that are planned throughout London. The Mayor has also not included the density matrix in the draft Plan that is set out in the current London Plan, and is instead proposing that density is informed by a design-led approach, with various density measures provided within planning applications. These measures will then be considered in the context of surrounding development to inform optimum density. This amended approach is considered a positive one, providing more flexibility and a site/context-specific measure.

The strategic policy approach in this chapter is supported and should steer local planning authorities to be more accepting of high-density residential proposals in areas of high accessibility, with good infrastructure provision and a suitable surrounding context.

User:	British Property Federation

It is acknowledged within the draft plan that London faces some significant challenges in providing the appropriate amount and standard of development to address growing need. It must therefore be recognised that if policies relating to the protection and enhancement of green/open space are to be strengthened, there must be a necessary shift in the densities delivered and the best use of suitable development sites. Within London's finite land area, in order to house a growing number of residents, businesses, and social infrastructure whilst hitting a target of making '*50 per cent of London green by 2050'* densities must be maximised and innovation promoted on suitable sites.

User:	Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living

D6 (117) - Optimising Housing Density

There is a risk that this policy provides land owners with false land value expectations and that housing supply is held up as a result. The Mayor needs to fully consider the implications of such a policy in a final London Plan.

When assessing density against planned future infrastructure and transport improvements, it must be clear that reasonable prospects of such infrastructure improvements materialising are in place (e.g. funding commitments and programme).

Appropriate design densities for differing residential uses must also be a consideration in deciding optimum density given that optimum density for older person's accommodation will often differ from general needs proposals.

The policy is supported in principle in order to make best use of previously developed land.

User: Durkan

Policy D2 (Delivering good design) encourages LPA's to undertake an initial evaluation of the capacity for growth in boroughs and to identify the most efficient use of land. It encourages developing at densities above those of the surrounding area on most sites and that design of the development must optimise housing density to deliver homes. Policy D6 (Optimising housing density) states that proposed residential development that does not demonstrably optimise the housing density of the site in accordance with this policy should be refused.

Durkan supports this approach.

However, Policy D6 includes a requirement for a mandatory design review and the submission of a Management Plan where a development sits above the applicable density range. It is considered that this has the potential to significantly slow down the design development process, potentially resulting in a conflict of approach between officers and the external design panel, and ultimately could end up reinstating or incurring greater restrictions on density. Management plans would create a further hurdle for developers, and potentially slow down the delivery of housing and create additional costly burden.
The current London Plan's density matrix identifies minimum development densities, which can be helpful in setting a baseline approach to development. Therefore it is suggested that the density matrix should be retained in some form, and the requirement for developments to comply with a design review be removed.

It is suggested that the requirement for a mandatory design review and submission of a management plan should be removed from Policy D6 Part C. It is also considered that a form of density matrix be retained in the New London Plan to outline minimum development densities.

User: N\A

The removal of the density matrix, which sets limits on housing density.

The density matrix should be re-instated to ensure that new development suits local character and is at an appropriate level for the surrounding area. The vague guidance that is now being proposed will allow developers to develop as they please, without being subject to a clear requirement on character or suitability

User: Urbanissta

Policy D6 Optimising Housing Density

The density calculation is based upon the following:

1. The site context
2. Its connectivity and accessibility by walking and cycling, and existing and planned public transport (including PTAL)
3. The capacity of surrounding infrastructure.

Comment: the density calculation if applied will mean fewer homes will be built than would otherwise be achievable. Potential occupiers of the unbuilt homes will have to live further out which then applies travel pressures and contributes to congestion.

User: Polly Chivers

I am thankful the open green spaces we currently enjoy in West London but I am writing to respond to the draft London Plan consultation. I am pleased that the draft recognises the importance of green spaces but policies need to be stronger to give them adequate protection, in particular:

- Excessive housing densities in new development should be resisted to protect the local character of London’s neighbourhoods.

User: Battersea Project Land Company Limited

Policy D6 – Optimizing housing density

Part C states that a management plan should be submitted for developments that exceed the density thresholds identified in the policy. Paragraph 3.6.8 identifies what this management plan should
contain. It is not clear why this management plan is required or how the information it requests, including running costs and service charges, can be known at the planning application stage. Some of
the information is already required in any event. We do not consider that the affordability of services has any relevance to the density of a development, and as such object to the requirement to provide
these management plans. The density of a development should be assessed at planning application stage, and only approved if it can be justified in design terms – noting that density is just one
characteristic of a development and should not be considered in isolation from other issues such as design quality, residential amenity and impacts on the surrounding environment.

Part D identifies the measures of density that should be submitted with an application. However, these are not appropriate for mixed-use developments.

We consider that Part E is too prescriptive. These measures will vary greatly from site to site and without a guide as to what is appropriate in each urban context, there is significant potential for such
measurement approaches to unduly constrain or shape development.

RECOMMENDATION: Delete the requirement to submit a Management Plan from Part C.

Amend Part D to identify how these requirements relate to mixed-use development. Delete Part E.

User: The Highbury Group

We are concerned that the adoption of a ‘design led approach’ as a replacement for the specific policies on Sustainable Residential Quality contained in previous versions of the London Plan will not necessarily increase the output of new homes to meet the challenges of London’s population growth, and will not ensure that the new housing supply produced is appropriate to meet the full range of the housing needs of Londoners. Design is one of the tools to meet planning requirements but should come after the definition of preferred locations for higher density development and an assessment of the need for different types of development. A focus on ‘good design’ without clear design guidelines cannot be a substitute for setting explicit planning policy requirements. If policy D6 remains, the intended content of a management plan this should be spelt out more fully. This should include consideration of all the components set out in Policy 3A.5 on Large Residential Developments in the 2004 London Plan.

User: The Highbury Group

While there is a case for amendments to be made to the density policy, we do not support the removal from the Plan of the density matrix or the removal of the density compliance Performance Indicator. The matrix, which set out appropriate ranges for density of new development in terms of both dwellings per hectare and habitable rooms per hectare relating to a) public transport access; b) the existing built form within an area and c) the relationship to a town or district centre. This has been an important tool in ensuring development density was optimised without compromising sustainable residential quality objectives and which provided a starting point for negotiations between developers and borough planning officers. While there is a case for reviewing the density ranges in the matrix, especially in relation to suburban sites with good public transport access and access to good social infrastructure, there is also a case for more explicit guidance on criteria for deviations from the appropriate range as abandoning the key policy control of development density is likely to facilitate further inappropriate development. This policy shift fails to acknowledge the relationship between development density and the type of new development output, in terms of built form, bedroom size mix and affordability.

The facilitation of higher density development also has an impact on land costs, which then has a negative impact on housing affordability. It is important that maximum permitted densities can simply and transparently be read off the plan and its policies to discourage those bidding for sites from over-bidding and then using viability arguments to secure higher densities or reductions in affordable housing provision. The market's need for certainty in respect of density is logically the same as its need for certainty about affordable housing requirements. The draft Plan adopts this logic for affordable housing (Policy 4.6.13) and should do so for density.

There needs to be adequate mechanisms for ensuring higher density development meet the full policy requirements set out in the Plan in relation to the built form, dwelling type, dwelling size mix, housing affordability, internal and external space standards and design standards in accordance with the principle of sustainable residential quality. This requires amendments to the draft plan policies and supplementary guidance, not just related to development and housing policies but also expanded guidance on delivery mechanisms and safeguards for private sector development set out chapter 11. We emphasise that we support improved design but there is nothing in the Density/SRQ matrix which inhibits good design within the parameters set. They are not alternatives.

The evidence that the matrix has never been enforced and has had little detectable influence is used by the Mayor as an argument for scrapping it. In our view it is evidence of the importance of enforcing it as firm policy as we propose.

User: The Highbury Group

D6 Optimising Housing Density Reinsert at beginning of D6 Policy 3.4A from existing London Plan, including Table 3.2 Density Matrix Revise suburban ranges in matrix as follows:

Public Transport Accessibility Level (PTAL)

	0 to 1	2 to 3	4 to 6
	150–200 hr/ha	180–350 hr/ha	200–450 hr/ha
3.8–4.6 hr/unit	35–55 u/ha	40–80 u/ha	45–115 u/ha
3.1–3.7 hr/unit	40–65 u/ha	50–115 u/ha	55–130 u/ha
2.7–3.0 hr/unit	50–75 u/ha	60–130 u/ha	70–185 u/ha

(proposed increases relate to PTAL 2-3 and PTAL 4-6 and may need to be subject to refinement. Existing ranges for PTAL 0-1 are considered to be appropriate)

Expand D6C to specify minimum components of required management plan. This should include compliance with policies H5, H7 and H12 and all design standards, including internal and external space standards. Design scrutiny needs to explicitly include assessment of utilities, transport and social infrastructure including access to open space and leisure facilities. The Mayor should draft an SPG setting out the components for the required management plan and the submission and assessment process and consult on the draft before a final SPG is adopted. There is a case for reintroducing Policy 3A.5 in the 2004 London Plan on Large Residential Developments, which required local planning authorities to prepare planning frameworks for sites of 10 hectares OR that would accommodate more than 500 dwellings, these frameworks to set out the transport and social infrastructure requirements for the development ,including community and ancillary services and how neighbourhood impacts would be dealt with.

Explanatory note: These amendments would reinsert the density matrix as a basis for ensuring that new developments met the principles of Sustainable Residential Quality. The matrix is amended to support intensification of suburban areas with Public transport Access of at least PTAL 2. The new policies for design scrutiny are retained, but to supplement rather than replace pre-existing density policy. The content of management plans for higher density schemes scrutiny are clarified as is the requirement for higher density schemes to be fully compliant with policy requirements on design as well as affordable housing and bedroom size mix. No changes are proposed to ranges for central and urban areas

User: The Highbury Group

Appendix 1 Technical Note

1 Housing density and sustainable residential quality.

The draft has amended the density policy by removing the density matrix. This in effect involves abandoning the key principle of Sustainable Residential Quality (SRQ) which has been a core principle of all versions of the plan since 2004 and derives from the pre-2000 work of the London Planning Advisory Committee (LPAC). The concept of density ranges for development based on public transport access, the existing built form within a neighbourhood and the relationship to town and local centres (and social infrastructure and other services) has been replaced by the concept of design-based scheme-specific appraisals. This is in line with the new approach of design led planning, without the setting of clear design criteria which are actually measurable in relation to a specific development proposal. Policy D6 sets thresholds above which applicants should submit a management plan. These thresholds relate solely to PTALs (public transport access levels) and do not relate to any of the other components of the density matrix. They are set at the top of the ranges for smaller units in the central area: 110 units per hectare for PTAL 0-1; 240 units for PTAL 2-3, and 405 units per hectare for PTAL 4-6. Neither the content of such a management plan nor the criteria for assessment are specified. It is significant that the thresholds refer to units per hectare and not habitable rooms per hectare. This completely disregards the fact that the impact of development in terms of public transport and demand for services relates to the number of people occupying/ likely to occupy new homes and not the number of dwellings (The density matrix was amended to focus on habitable rooms rather than dwellings in 2007).

The density policy, presented as ‘ design led’ makes no reference to policy requirements in terms of types of housing to be provided either in terms of built form, mix of units in terms of bedroom size (i.e.: whether studio flats or family sized homes) or affordability. There is no recognition that there is a relationship between density of development and type of housing output (despite the evidence of monitoring of development output in recent years, which has shown a reduction in family sized homes and affordable homes as densities have risen). It is also significant that policy H12 on housing size mix refers to optimising the housing potential of sites, without specifying any dwelling mix targets at a London wide level (despite this being included in previous London Plans and/or Mayoral supplementary planning guidance). While there is a reference to resisting schemes which consist mainly of one person and/or one bed units (H12B), the focus of the overall policy is on smaller units rather than family sized units and H12C says that boroughs should not set ‘prescriptive’ dwelling mix guidance for market led schemes. The focus is clearly on enabling developers to build homes that are most profitable for them, rather than on meeting the requirements as identified in either the London-wide Strategic Housing Market Assessment or in sub-regional or borough specific SHMAs.

Moreover, there is no recognition that the introduction of greater flexibility on density, together with relatively weak affordable housing targets for specific schemes, has the impact of increasing land prices as landowners see the opportunity for greater financial returns, which in turn has a negative impact on housing affordability.

While the Plan seeks to introduce as a new vision, the concept of ‘Good Growth’, this appears to be rhetoric rather than substance given the proposed changes to density policy represent not just an abandonment of the core principle of ‘sustainable residential quality’ but in effect incentivise development which does not meet the housing needs of Londoners as identified in the new Strategic Housing Market Assessment and adds further barriers to the ability of the boroughs, as local planning authorities, to respond appropriately to the full range of identified needs. The new policy in effect gives preference to the objective of maximising unit out-turn over other key planning policy objectives.

User:	Pocket Living
Policy D6 is welcomed and supports the approach Pocket has taken across London in making effective use of urban sites to deliver more affordable homes.	

User: Mrs Alona Sheridan

I believe policy D6 concerning the optimisation of housing density needs to be amended to avoid a lack of associated public infrastructure, and excessive housing densities and ‘town cramming’.. **Proposed changes:** The phrase ‘in exceptional circumstances’ should be deleted from the last sentence in Policy D6B 3) so that it reads **‘This may mean that development is contingent on the provision of necessary infrastructure and public transport services…’**. The density levels specified in Policy D6C should be amended to 80, 170 and 260 units per hectare respectively so that it reads: **‘ 1) 80 units per hectare in areas of PTAL 0-1; or 2) 170 units per hectare in areas of PTAL 2 to 3; or 3) 260 units per hectare in areas of PTAL 4 to 6’**.

User:	Blanche Cameron
Excessive housing densities in new development should be resisted to protect the local character of London’s neighbourhoods.	

User:	Blanche Cameron

We believe policy D6 concerning the optimisation of housing density needs to be amended to avoid a lack of associated public infrastructure, and excessive housing densities and ‘town cramming’.. **Proposed changes:** The phrase ‘in exceptional circumstances’ should be deleted from the last sentence in Policy D6B 3) so that it reads **‘This may mean that development is contingent on the provision of necessary infrastructure and public transport services…’**. The density levels specified in Policy D6C should be amended to 80, 170 and 260 units per hectare respectively so that it reads: **‘ 1) 80 units per hectare in areas of PTAL 0-1; or 2) 170 units per hectare in areas of PTAL 2 to 3; or 3) 260 units per hectare in areas of PTAL 4 to 6’**.

User:	Mr John Togher

Excessive housing densities in new development should be resisted to protect the local character of London’s neighbourhoods and to limit traffic congestion and pollution which negatively impact on individuals' quality of life.”

User:	Mrs Denise Togher

Excessive housing densities in new development should be resisted to protect the local character of London’s neighbourhoods and to limit traffic congestion and pollution which negatively impact on individuals' quality of life.”

User:	Mr Mike Bowler

Excessive housing densities in new development should be resisted to protect the local character of London’s neighbourhoods. This should include not allowing the wedging of unsuitable and overpowering blocks of flats into streets of suburban houses just to gain extra council tax at the expense of the strain on public utilities

User:	Teri Malakounda

Excessive housing densities in new developments should be resisted in order to protect local character in London neighbourhoods. Thus avoiding overloading current infrastructure.

User: Regeneration X

Policy D6 Optimising Housing Density
B1) '*The density of development proposals should be based on, and linked to, the provision of future planned levels of infrastructure rather than existing levels'*

But we have an economic system which is cutting back on the provision of infrastructure, especially social infrastructure, (or is at least restricting the funding of the infrastructure which is really required). We have no confidence that funding the provision of infrastructure (CapEx and OpEx) will be delivered. Therefore this means that the whole of the London Plan is undeliverable.

3) says that in exceptional circumstances development is contingent on the provision of infrastructure. This is not strong enough. It implies that in most cases development can go ahead even if the supporting and enabling infrastructure is not in place. We must therefore object to this section – development can only be sustainable if the infrastructure in place – there must be no exceptions to this principle.

User:	Regeneration X

3.6.1 '*This means developing at densities above those of the surrounding area on most sites*'. This seems to be forgetting that high densities requires high quality design and high-quality maintenance and management for such densities to work. Experience tells us that in the main (especially for mainstream housing) this doesn't happen. We have no confidence that the high costs of managing and maintaining flats will be met over the long term. We have seen this happen in the recent past and this is not something we should repeat. Therefore there is great risk that the London Plan will not improve London for those who live and work here. Also, where are the weekend homes and leisure gardens which enables the delivery of high densities in many continental cities and which makes them liveable?

User:	Regeneration X

3.6.5 It seems to be assumed that town centres are close to stations. In the suburbs this is often not the case and is therefore an incorrect assumption. This leads to the assumption that the Plan has been written by people who do not understand how outer London works.

User:	Network Rail

3.62-3.63, page 119 – It should be clearly stated in the Plan that both the Mayor and London Boroughs need to seek the advice of, and work closely with, Network Rail when creating their Infrastructure Assessments and Infrastructure Delivery Plans. This is fundamental to capturing the needs of the network and infrastructure.

User:	Joy Brown
3.6.3 The cumulative impact of development **must** be considered.	

User:	Pat Turnbull

D6 Optimising housing density

3.6.1. **Delete the sentence ‘This will mean developing at densities above those of the surrounding area on most sites.’**

User: Mr John Taylor

The aim of the plan to promote high density housing in the outer London boroughs - the Draft New London Plan categorises Mill Hill as having a high residential growth potential - by the abolition of PTAL ratings and the introduction of the small sites scheme, would not be suitable for Mill Hill which is suburban and covers a large area of green belt. Moreover, there is a lack of infrastructure and facilities to support the goal of high density housing in Mill Hill.

User:	Mrs Jean Smith

Too much building is going on. We are choking to death with the over- crowding encouraged by certain councils and political leaders in the name of progress. The London Mayor seems to think people should be shoe- horned into high rise apartments with no parking! Well people do want to drive in outer zones. The public transport infrastructure is not able to provide the solution to the long distances people have to cover to access hospitals etc. We should be allowed to drive.

User: East Barnet Resident Association

- People choose to live in East Barnet because of its attractive spacious layout, with traditionally-built mainly terraced houses for families to enjoy - with gardens and parking spaces.
- There has already been a considerable amount of new building in our area and the result is that there are very few opportunities left for even more building.
- Cramming in too many more properties just detracts from every aspect of quality of life.
- To convert offices and shops into blocks of flats, and build even higher than all the loft extensions already in place will change the whole character of our area.
- Barnet cannot be expected to build 2,350 homes per year, when other boroughs like neighbouring Enfield have a lower target of 789. Barnet is already more densely populated (at 4%) than Enfield (at 3.8%).
- Please look at other opportunities like encouraging homeowners to downsize when they have spare bedrooms. For example, grant exemption from stamp duty when people buy a house with fewer bedrooms than they are selling.

User:	Cllr Caroline Newton

Density ranges for housing have been removed this will lead more intense developments on small plots with little parking. Zero parking will be sought on developments. Bexley does not have any underground tube stations or DLR nor direct railway links that connect key local employment locations in this part of suburban London such as Bexleyheath, Sidcup and Bromley. This will mean that it will be extremely difficult for these residents to get to work without private transport. Even if residents travel by train for their work, they need cars to socialise, shop and enjoy family lives. The Mayor needs to consider the transport links in this part of the city he serves before even considering disrupting residents' lives.

User:	Crest Nicholson PLC

a) Policies D2 and D6- the impact of optimisation of densities may mean that higher buildings need to be constructed. Currently, construction of buildings beyond 18m and also 30m both result in dramatic increases in build costs having a potential negative impact on project viability. Higher buildings may not be appropriate outside of Zone 1 for many reasons including design but also because the sales prices potentially achievable in Zone 1, that enable the increased build costs associated with tall buildings to be borne, are not achievable outside of Zone 1; When this is considered in the context of increased design scrutiny for high density schemes there is a real risk of policy which is intended to increase delivery will do the very opposite. The Hackett Review is being conducted as regards Building Regulation changes and it is expected to have a direct bearing on tall buildings and the build costs associated with construction above a certain height.

User:	Crest Nicholson PLC
e) Policy D6- optimisation could impact on viability if it requires construction at height or early provision of planned infrastructure;	

User:	Save Swiss Cottage

5. To prevent development of sites without sufficient density all applications with sub optimal density are to be refused. This appears to mean that any house not converted to flats would be automatically refused planning permission regardless of the application’s significance, merit, desirability or public benefits and effectively puts a hold on any changes to a large percentage of London’s housing stock.

User: Primrose Hill Conservation Area Advisory Committee

D2 A7 We welcome this clause.

D2 D Design Codes General 1: we are concerned by the reference to Design Codes and their effectiveness. There must be concern that the NPPF's statement (36) that design codes should 'avoid overly prescriptive detail' may make them an inadequate mechanism for managing density **(D6)** in complex and sensitive heritage areas. See also policy **H2 B 2.**

General 2: We are also very concerned over who prepares Design Codes. They need to be undertaken transparently in collaboration with local communities to be consistent with the Mayor's objectives.

Our proposed amendments – reasoning: To achieve effective policy implementation, and consistency with the Mayor's objective of working collaboratively with local communities.

Our proposed revised text: to ADD 'Design Codes should be prepared by Boroughs transparently and in collaboration with local communities, respecting local distinctiveness, and preserving and enhancing heritage assets.'

D2 G 4 Draft policy: 'design review recommendations are appropriately recorded and communicated to officers and decision makers'

Our proposed amendments – reasoning: to ensure consistency with the requirement for transparency at D2 G 1. Our experience is that, while design review is welcome, it lacks transparency, and is not open to scrutiny. Our amendment seeks to address both the means of better achieving high quality design, and the need to build trust in democracy.

Our proposed revised text: 'design review recommendations are appropriately recorded and communicated to officers and decision makers, and made public for scrutiny in good time before officers' recommendations are prepared.'

User: Hornsey & Wood Green Labour Party

We broadly welcome policies D1 to D6 in the draft London Plan which seek to improve the design and land use efficiency of new housing. We believe policy D6 concerning the optimisation of housing density needs to be amended to avoid a lack of associated public infrastructure, and excessive housing densities and ‘town cramming’.. Proposed changes: The phrase ‘in exceptional circumstances’ should be deleted from the last sentence in Policy D6B 3) so that it reads ‘This may mean that development is contingent on the provision of necessary infrastructure and public transport services…’. The density levels specified in Policy D6C should be amended to 80, 170 and 260 units per hectare respectively so that it reads: ‘ 1) 80 units per hectare in areas of PTAL 0-1; or 2) 170 units per hectare in areas of PTAL 2 to 3; or 3) 260 units per hectare in areas of PTAL 4 to 6’.

User:	Mr Colin Bannon
3.6.6 It would be good to reference some good guidance material on how to create successful masterplans.	

User: Kew Society

Policy D6 Optimising housing density

The policy requires making the most efficient use of land which should be developed at the optimum density and that proposed residential development that does not demonstrably optimise the housing density of the site should be refused. This has great potential for harm not only to areas of, or near, areas of special character (such as Kew) but in general.

The density matrix which previously informed planning policy has been scrapped. Thus there is no longer a maximum density. We believe a maximum density should be retained so that good quality housing is not put at risk by the drive for greater quantity. The question of infrastructure necessary for such developments is not satisfactorily addressed. The applicants for permission and the providers (utilities) must work together but other infrastructure needs (roads, schools, doctors, etc.) cannot be created immediately. The funding needs (or lack of funding) is acknowledged, but no real plan for providing funding is set out. There is provision for phasing developments where infrastructure is not available when development starts. Evidence is needed to show this is commercially viable. The Plan also needs to show what effect phasing, if needed, would have on housing targets for Boroughs.

Transport infrastructure is a key concern. Without effective planning and provision of transport facilities (bearing in mind the target of 80% journeys to be by public transport, walking and cycling), optimising density will create overload on existing transport facilities and roads. This adds to congestion as well as air pollution.

In *Paragraph 3.6.1* the most efficient use of land will mean developing at densities above those of the surrounding area – suburbs and small sites. This should be amended so that the local character of areas, say of two storey homes, can be protected from developments which would destroy their valued character, such as from higher rise buildings.

Paragraph 3.6.8 says that management plans for higher density proposals must include details of affordability of running costs and service charges by different types of occupiers. This prescription strays into the realm of landlord and tenant legislation which already deals with service charges and leaseholder protection. For affordable housing, this would presumably relate to social housing providers. It is not clear how planning requirements could regulate future costs of services. These aims should be considered within landlord and tenant legislation, not planning legislation.

User: Home Builders Federation

Policy D6: Optimising housing density

The policy is unsound in places because it is unjustified.

There is a fundamental tension within the draft London Plan. Its ability to support the delivery of 65,000 homes a year requires securing a much higher density of development across all development locations in London. The ability of the draft London Plan to deliver its housing targets depends on these increased densities being achieved as well as a not insignificant volume of land coming forward in suburbia to secure the small site targets. However, to square this – to ensure that development at density and in more untypical locations is acceptable to the public – requires a much higher degree of design scrutiny. More schemes will be referred to the Mayor. This is what Part C articulates. The much more involved Design Review process outlined in the draft London Plan, however well intentioned, is simply not compatible with supporting the construction of 65,000 net housing additions a year. The process will be slow and costly, and will probably result in many non-implementable schemes.

We can understand why the Mayor would have to introduce his Design Review as a safeguard against the kind of problems that might arise from the removal of the density matrix; namely the risk of more unsuitable schemes popping-up that are incompatible with local context, local amenity and which might be environmentally harmful. The problem the Mayor has is that he also needs to deliver his housing targets. While no one can prove that the Design Review process will be injurious to housing delivery, it would be true to say that the new system is largely untested. Experience based on past experience with CABE's Design Review process suggests that it will create more uncertainty as well as severely slow down the planning determination process, especially at a time when local authority planning departments are under-staffed and under-resourced.

We consider that the delivery of 65,000dpa in London is a wildly optimistic especially when a large component of this supply will have to be subject to the new Design Review process.

Part B 3) is unsound because it is negative, unjustified and ineffective.

Part B 3) requires that where development is contingent on the provision of the necessary infrastructure and public transport services the development should be phased. This is unlikely to be conducive to the delivery of the housing targets required, or the provision of the infrastructure needed in developments, as in many cases bank loans to builders are agreed on the basis of phased repayments of the loan with those repayments financed from the completion and sale of homes in the early phases. In addition, it is these early sales that help to pay for the Mayor's CIL, the borough CILs and site specific S106.

It is frequently the case that much of the infrastructure is not in place in the early phases of a development. The obvious example is Nine Elms where the funding for the delivery of the Northern Line Extension – which is not due for completion until 2020 – is being financed in part by the completion and sale of units in the early phases. The possibility that planning permission for new homes will not be approved until the infrastructure is in place, especially in the certain housing locations such as the Opportunity Areas which are key to the success of the London Plan, represents a significant risk to the delivery of the housing targets. This is unsound reasoning by the Mayor: the requirement is unreasonable and fails to reflect the positive planning principles of the NPPF.

This sentence should be removed.

Paragraph 3.6.8

We recommend that this supporting paragraph is re-drafted to refer to the Mayor's Service Charge Charter.

Policy D7 Public realm

User:	Galliard Homes

Galliard strongly agrees that every application should look to positively contribute to the public realm – where able, as not every scheme can. We therefore support the objective of Policy D7 – Public realm. However, under part M, we feel that the policy should be worded to state:
`Promote the provision and future management of free drinking water…'.
Galliard agrees with the healthy living narrative promoted later in the Plan for which this policy is trying to maintain the theme, however such a policy requirement has knock on effects that need to be fully understood and considered that can't be `ensured' on every scheme.

User:	Marisol Ferrin

I welcome the reference to urban greening in Policy D7 Public Realm. This should include a broader commitment to, and requirement for, conserving and restoring urban nature rather than the current common approach to installing trees in concrete or tubs and planting of low nature value.

User:	Dolors Vila

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User:	Helena Azzam

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User:	Miriam Schmitter

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User:	Lillian Billing

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User:	Kourosh Khakpour

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User:	Kam Sihota

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User: City of London Corporation

The City Corporation welcomes the strong emphasis on delivering a public realm which can accommodate a myriad of functions: sustainable transport movement (walking and cycling), vibrant use, urban greening and public art and open events. However, in particular in the CAZ, it should recognise that accommodating servicing is essential to allowing a place to function and that this can conflict with the public realm agenda. It is suggested that the policy tackles servicing requiring:

- Off-street servicing where practicable;
- Single access off-street servicing where possible as part of the re-development of larger sites;
- A need for servicing agreements to ensure conflict with the public realm is minimised; and
- A requirement to minimise servicing entrances and for them to be designed in a manner which is attractive.

The City Corporation's pedestrian modelling suggests the City of London's essentially Medieval and Victorian street network and public realm is under significant stress, both at present and in the future with projected significant employment and population growth. It is suggested that the policy should recognise as essential that new development delivers new public realm and an improvement in the quality of the public realm to absorb the additional numbers whilst creating a public realm which is vital, comfortable and safe, allowing for active frontage, space for rest and relaxation and urban greening. Measures such as the reallocation of space from vehicles to pedestrians and cyclists should be considered.

User:	City of London Corporation

The City Corporation welcomes, at paragraph 3.7.1, the extension of the definition of the public realm to ‘‘some internal or elevated spaces, such as shopping malls, sky gardens, viewing platforms, museums or station concourses. The recognition that such forms of public realm are particularly important in areas of higher density is also welcomed. In this context, the City Corporation considers that the main body of the text should include a more radical policy requiring the creation of both ground and elevated public realm to accommodate a sufficient public realm, making explicit reference to upper floor galleries, viewing platforms, sky gardens from which wider views and a greater appreciation of London can be made, making people feel part of the City and creating a more inclusive environment.

User:	City of London Corporation
Paragraph A, This could make reference to the public realm containing historic interpretation which would allow people to engage with deep layers of London history.	

User:	City of London Corporation

Policies D7 and SI1 (Improving Air Quality) advise that design solutions can improve air quality in open spaces and the public realm, however there appears to be no further text in the Plan which indicates how this could be achieved. Further emphasis and guidance on this issue would be useful as many spaces are designed to minimise maintenance costs and/or look attractive but do not include design measures to reduce exposure to air (and noise) pollution.

User:	Adrian Jenkins

I welcome the reference to urban greening in Policy D7 Public Realm. This should include a broader commitment to, and requirement for, conserving and restoring urban nature rather than the current common approach to installing trees in concrete or tubs and planting of low nature value.

User:	London Tree Officers Association

The LTOA considers that a specific reference to both street trees and tree in private gardens should be included in this policy, as they are a principle component of the pubic realm.

User: Team London Bridge

15. The London Bridge Plan identifies the railway arches through the area as part of a “Low Line” which stretches across borough boundaries. The London Plan has an important role to play in realising the potential of railway arches because of the way in which they span in individual borough responsibilities. They can help meet the London Plans objectives for affordable workspace (Policy E2), improved public realm (Policy D7) and healthy streets (Policy T2). This multiple role is often overlooked.
Recommendation
• Recognise the role of railway arches in contributing to the delivery of Policy D7 and Policy T2 as well as Policy E2 and their role in securing economic, public realm and access objectives in an integrated way

NB Applies to Policies E2, D7 & T2

User: Team London Bridge

The River Thames is the defining landscape, historic and natural feature of London and the crossing at London Bridge was the origin of the city. We believe it should feature more strongly in London Plan policies and that more emphasis is given to addressing routes along it and the positive economic, social and environmental contribution it makes. The London Plan has a particularly important role in providing a coherent approach given the Thames passes through so many boroughs. The London Bridge Plan emphasises the importance of the connections along the river and promotes the Thames Esplanade to “seamlessly connect London Bridge’s riverfront and Pier into Bankside to the west and the rest of The Queen’s Walk to Tower Bridge to the east, creating a riverwalk connection that will form a continuous path along the Thames.”

We welcome that “use and enjoyment” of the Thames is identified as a strategic function of the Central Activities Zone and some protection afforded the Thames from tall buildings in Policy D8 and in strategic views (Policy HC3). Policy SI14 is especially welcome in encouraging the identification of Thames Policy Areas.

Recommendations
• Amend Policy D7 explicitly to recognise the importance of the public realm provided by and along the Thames, including specific reference to the need for expansive, continuous public access to the riverfront

User:	London Borough of Barnet

The provision of free drinking water is supported - sugary drinks are the single largest source of sugar in children’s diets and encouraging free and accessible options can make a positive contribution. Additionally, single-use non-recyclable plastic water bottles are costly both to the consumer and the environment. However, we recognise that an individual water fountain can cost >£2,000 and it is unrealistic to expect local government to be able to fund the cost of access and ongoing management in all public spaces. To encourage London boroughs, we recommend the Mayor provides some initial funding which local authorities can use to target communities most in need. By adopting a junk food marketing levy on TfL advertising space, the Mayor could use money raised to fund accessible drinking water. This would also demonstrate the Mayor’s commitment to improving the health of Londoners and the environment which he has identified as a strategic ambition within all Mayoral strategies.

User:	Wheels for Wellbeing
3.1 We support the idea that Development Plans should encourage and facilitate inclusive cycling routes and cycle parking. Connectivity is particularly important for disabled cyclists who, in order to complete a full journey, require step-free, door-to-door routes that are reliably and consistently accessible (which includes fully accessible, integrated modes of transport).	

User:	London Borough of Barnet

We support policy on provision of public toilets in large publicly accessible developments. Recognition of the importance of public toilets is already acknowledged within the Council’s Green Infrastructure SPD. This policy could usefully work in tandem with DLP Policy D7 support for accessible and free drinking water

User:	Space Syntax Limited

Para B
- The priority of public realm improvement projects at different parts of the network should be considered in relation to the wider context through impact assessment.

User: Thames Water

We support Policy D7 Part H regarding sustainable drainage.

In relation to Policy D7 Part M and paragraph 3.7.11 which states that new development should provide free drinking water fountains. We support increasing the availability of high quality water without people needing to purchase bottled water and are working with the Mayor to roll out the Refill scheme https://www.refill.org.uk/ in London. However, it is essential that drinking water fountains are designed, installed and maintained to ensure that water quality is not compromised. Thames Water has developed a policy document on drinking water fountains that local authorities and others should follow. This document is available on request and will shortly be uploaded onto the Thames Water website.

User:	Caroline Pidgeon

I welcome the plans that you have drawn up to develop a set of responsibilities that privately owned public spaces will have to adhere to. This is long overdue. The public's rights in these spaces, notably around South Bank and King's Cross, have been mired in uncertainty for far too long. I have been pushing for clarification on this matter for years and am pleased that you have acted following the motion that Assembly Members approved in September 2017. It is important that action is finally taken and I look forward to scrutinising the details of your charter once it is finalised.

User: London Assembly Planning Committee

Recommendations Policy D7 should be amended to reflect the Assembly's view that the Mayor ensures that the aspirations set out in his Public London initiative are enshrined in the London Plan so that transparent, accountable and uniform guidance can be provided across London. Policy D7 B should be amended to read: 'Be based on an understanding of how the public realm in an area functions and creates a sense of place, during different times of the day and night, days of the week and times of the year. In particular, they should demonstrate an understanding of the types, location and relationship between public spaces in an area, identifying where there are deficits for certain activities, or barriers to movement that create severance for pedestrians and cyclists. This should be achieved through engagement with the local community and future users in the design of the public realm.' Policy D7 G should also be amended to read: 'Ensure appropriate management and maintenance arrangements are in place for the public realm in consultation with users, including members of the local community, which maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter'. The Mayor should remove shopping malls, sky gardens, viewing platforms, museums or station concourses from the definition of 'public realm' in paragraph 3.7.1.
4.41 The Committee is pleased that Policy D7 is promoting a more inclusive and better managed approach to providing public realm in London. However, we are concerned that there is a lack of reference to community engagement in the design and management of public realm.ix
4.42 The Planning Committee's 2011 report Public life in private hands: Managing London's public space found that London's public realm needed better management. It argued that private and public spaces alike can be neglected without a comprehensive management plan agreed during the design and planning stages. It urged the Mayor to emphasise the importance of management plans in development and of ensuring access to all users. We are pleased that this is now included in Policy D7.
4.43 The report also considered the role that community involvement can play in public realm, finding that 'early community consultation on development proposals, particularly where they include open space or other public space, is vital to a successful outcome for public space management'.30
4.44 As the Planning Committee noted in its report, privately owned spaces are often heavily monitored by security and CCTV, have restrictive rules and can be unwelcoming to certain users. For example, it is difficult to see how an indoor shopping mall can function without imposing some restrictions against access and certain activities and users, such as walking pets. With the current definition, there is little to stop a shopping mall development from not providing any public spaces or squares. Indoor shopping malls and sky gardens are not the same as outdoor public squares and open spaces where restrictions on activities and users are minimal.

User: Newham Union of Tenants

D7 Public realm

We feel that it should be made clear in policy that new developments should not take over or prevent free access to rights of way (between buildings, whether public or private……London Waterways - paragraph 3.7.1.) We fear this is a problem in terms of routine appropriation of public realm areas for expensive café and restaurant areas along the Thames. This may make such areas ‘vibrant’ for some, but also inaccessible and exclusive to others. We propose that such areas should be provided for within the footprint of the development to prevent difficulties for others accessing public rights of way.

User:	London Waste and Recycling Board (LWARB)

1. Policy D7 – Public realm, currently does not include any reference to waste and recycling infrastructure. We would recommend an additional point is included which requires suitable waste and recycling infrastructure to be included in the public realm and the operational needs of this infrastructure to be considered.

User:	London Waste and Recycling Board (LWARB)

1. We support policy D7(M) to ensure the provision and future management of free drinking water at appropriate locations in new or redeveloped public realm to support reduction in single use plastic bottles.

User:	London Waste and Recycling Board (LWARB)

1. We agree that opportunities should be identified by boroughs and developers for use of meanwhile space to create attractive public realm, but perhaps it would be appropriate to indicate a hierarchy of uses from temporary housing through commercial and small industrial to public realm.

User:	Bromley Friends of the Earth

Nature [policy D7]

A more meaningful commitment to and requirement for conserving and restoring urban nature is needed.

User:	Bromley Green Party

A more meaningful commitment to and requirement for conserving and restoring urban nature is needed.

User:	London Borough of Merton

Support with amendments This is generally a welcome policy on the public realm. However, a significant omission is the lack of a clear explanation or definition of what the public realm is and acknowledgment that a very significant component of it is made up of streets. Parts B & C appear to be contradict each other, which could be resolved by inclusion of clarity on what defines a street. The reference to decluttering is welcomed.

The policy's positive contributions to public health improvements is supported, including by encouraging the provision of free drinking water and the adoption of the Healthy Streets Approach.

User: London Tenants Federation

3.6.7 Policy D7 Public realm

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User: Better Bankside Business Improvement District

Chapter 3: Design

Policy D7 acknowledges the role of the public realm in delivering attractive, healthy and sustainable places and supporting good growth. Better Bankside are pleased that this is recognised at both the strategic and development proposal level.
In recent research of Better Bankside's membership as to what Better Bankside's priorities should be for the next 5 years, 86% wanted greater investment in public spaces and urban greenery, 79% wanted greater investment in air quality measures and 75% wanted to see streets improved to support walking and cycling.

The policy draft encourages the adoption of urban design principles to improve the public realm and this is advocated by Better Bankside, who has been working in partnership with many local and strategic agencies and landowners to deliver Bankside Urban Forest1, the placemaking strategy for Bankside over the last 10 years.

Improving the legibility and permeability of London's streets are cohesive with many of Better Bankside's project aims relating to the public realm. Connectivity improvements that are led by enhancements to the urban fabric will be key in creating walkable and cyclable streets which are also in conjunction with Point B pertaining to the discouragement of vehicle use.

Such aspirations are exemplified by one of Better Bankside's other strategic projects: The Low Line2. A partnership driven project, it connects London Bridge with Waterloo stations through a traffic-free route along the base of a viaduct that dissects the area. The Low Line also encourages economic viability south of the viaducts.

Unlocking alternative routes such as The Low Line, that are inviting for pedestrians and/or cyclists will help to alleviate congested thoroughfares currently under pressure; offering journeys with improved air quality that are also in-keeping with the local character and reflect its heritage. The promotion and actualisation of these considerations to the public realm must be incorporated into policy within Area-specific and Local Plans.

Point C within the draft policy indicates that an appreciation of the existing location and activities are critical to the success of creating a sense of place, and that development proposals ought to reflect this. Point E also states that any planned works should consider the function of buildings within the immediate area. Although supportive of this in both instances, Better Bankside would suggest an amendment to the policy that encouraged proposals affecting the public realm to involve the residents and business users within the vicinity to ensure the most appropriate design outcomes

User:	Better Bankside Business Improvement District

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User:	Better Bankside Business Improvement District

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User:	Somers Town Neighbourhood Forum

We welcome the requirement for development plans to demonstrate an understanding of the types, location and relationship between public spaces in an area, indentifying where there are deficits for certain activities. This should be through an up-to-date needs assessment that looks at different-sized parks, play space, community gardens, natural green space, etc.

User:	London Borough of Haringey

The policy is supported.

There does however need to be recognition of the pressures on public finances to maintain the quality of spaces in the longer term, which is sometimes harder to achieve than the initial cost of installation.

User:	London Cycling Campaign

Replace D (last line):
“particular focus” with ***prioritised***

Add L:
as well as ***sufficient*** cycle parking in the carriageway

User:	London Borough of Hounslow
LB Hounslow supports this policy	

User:	Environment Agency

We welcome the policy objectives for the public realm. Notwithstanding that the Plan is read as a whole, we suggest that there is further scope for this chapter's policies to better integrate with, and cross-reference to, other policies across the Plan which will equally influence the design of both buildings and the places they create, e.g. Chapter 8 on green infrastructure and the natural environment, Chapter 9 on water management, flood risk management and sustainable drainage, and 'Chapter 10's 'Healthy Streets' approach.

User:	Environment Agency

We support this policy, particularly the following points:
B. Maximising the contribution of the public realm for ‘active’ travel

User:	Environment Agency

We support this policy, particularly the following points:

H. The incorporation of green infrastructure to support rainwater management through sustainable drainage, reduce exposure to air pollution, manage heat and, increase biodiversity.

User:	Environment Agency

We support this policy, particularly the following points:

L. Ensure that on-street parking is not dominant and that there is space for green infrastructure

User:	Environment Agency

We support this policy, particularly the following points:

M. Ensure the provision and management of free drinking water.

User: Environment Agency

We suggest that adding a reference to the role of the public realm in supporting an integrated approach to water management would also be helpful in delivering policy objectives for securing London's water future, in implementing the sustainable drainage hierarchy, and in building resilience to climatic changes.

Recommendation:

Add to the policy explanatory text, to advocate an 'integrated water management' approach, drawing out the synergies between this, and the delivery of new and improved public realm'. This would support the delivery of multi-functional benefits, enhance natural capital, and support a range of policies in Chapters 8 and 9. Our comments on Chapter 9 below refer.

User:	Environment Agency

Recommendation:

We suggest adding an element within the explanatory text to support Policy point. H, drawing out the opportunities to utilise the public realm to integrate water management, particularly in major development locations.

User: London Borough of Lewisham

We support D7 as it gives public realm the status it deserves.

However, it is prescriptive and could lead to a more protracted planning application process (as D2 above).

Further consideration should also be given to:

- Amending D7 to acknowledge that not all development proposals affect public realm.
- How free drinking water will be funded and managed.

User: London Borough of Brent

The policy is supported. There does however need to be a recognition of the pressures on public finances to maintain the quality of spaces in the longer term, which is sometimes harder to achieve than the initial capital sum of installation. There could also be a greater emphasis specified around relationship between ‘cleaner, greener, safer’ theory. This is that a cleaner and greener location creates increased feelings of safety. So design from the outset should be around ensuring increased cleanliness and greenery is important. This also relates to street furniture and ‘seating’ as this can also create an area for anti-social behavior and enviro crime. Areas for community members to meet is also essential, it needs to be designed in the right way and area to ensure a reduction of anti-social behavior opportunities. Lighting is also a critical element of this.

It is recognised that the policy applies to a variety of areas of public realm as opposed to merely focussing on streets. Perhaps more could be done in the policy emphasis to promote active change of streets as places of public realm that can create a sense of place, with a rebalance to reduce vehicle dominance, e.g. specific mention of shared space/Homezones. Criterion L would benefit from greater emphasis on street trees as well as the generic term green infrastructure and crossings being direct and unenclosed.

Amend text to:

A "Ensure the public realm is safe, accessible, inclusive, attractive, well connected, easy to understand and maintain, and that it relates to the local and historic context, and incorporates the highest quality design, landscaping, planting, lighting, street furniture and surfaces that will endure for the longer term and achieves the ‘cleaner, greener, safer’ objective."

B "Recognise the need to deliver the Plan’s modal shift target by 2041 by prioritising existing and new streets and other public realm to maximise the its contribution that the public realm makes to encouraging active travel and ensure its design discourages travel by car and excessive on-street parking, which can obstruct people’s safe enjoyment of the space……"

D "…. The priority modes of travel for the area should be identified and catered for and creation of ‘shared space’ and Homezones should be considered as appropriate. Desire lines for people walking and cycling should be a particular focus, including the placement of street crossings."

L "Ensure that on-street parking is designed so that it is not dominant or continuous, and that there is space for street trees and green infrastructure as well as cycle parking in the carriageway. Pedestrian crossings should be straight, regular at convenient intervals, accessible, direct and guard rail free."

User:	Save Swiss Cottage

D7 Public realm
We feel that it should be made clear in policy that new developments should not take over or prevent free access to rights of way (between buildings, whether public or private……London Waterways - paragraph 3.7.1.) We fear this is a problem in terms of routine appropriation of public realm areas for expensive café and restaurant areas along the Thames. This may make such areas ‘vibrant’ for some, but also inaccessible and exclusive to others. We propose that such areas should be provided for within the footprint of the development to prevent difficulties for others accessing public rights of way.

User:	London Borough of Bromley
The policy is noted.	

User: London Councils

London Councils is supportive of the Mayor’s intention to publish a Public London Charter. This will set out the rights and responsibilities for the users, owners, and managers of public open spaces irrespective of land ownership. It is important to ensure that public spaces are inclusive, and open to all. London Councils would support the use of the charter to validate decisions around maintaining quality public realm spaces. The charter could particularly be used to enable boroughs to refuse planning applications for the provision of unnecessary street furniture, which can clutter open spaces and act as a deterrent to walking and cycling.

Boroughs are supportive of applications that improve the viability of open spaces, such as performance space and pocket parks, which can lower levels of childhood obesity and provide an alternative to traditional outdoor activities.

London Councils is also supportive of increasing the number of water fountains to reduce the increased waste from single-use plastic bottles. Boroughs should be encouraged to identify where water fountains can be provided within planning applications in areas such as shopping and town centres. The management and maintenance of any additional water facilities will require extra resources and the GLA can advise boroughs on how best this can be funded.

We welcome the mention of reducing air pollution through the installation of green infrastructure on new developments. Further air quality policies are outlined elsewhere in the draft plan and linking requirements for air quality in the public realm to other policies within this plan would be welcome.

User:	London Borough of Tower Hamlets

We are broadly supportive of this policy, although some aspects would benefit from greater clarity.

Clearer definitions are required of what constitutes unnecessary street clutter, and how this could be measured (i.e. the new style advert telephone boxes), given the policy has the potential to assist with managing the proliferation of street furniture.

User:	Old Bermondsey Village Neighbourhood Forum

Policy D7 D and E should be clear on how the phrase “individual characteristics of the area” and the term “vibrant” are to be understood / defined (and policies J and K further developed) in terms of innovative and appropriate frameworks for the assessment of local character and local need that ensures compliance with the Public Sector Equality Duty.

User:	Royal Borough of Kingston
General support. **Part H** “heat” should be replaced by “urban heat island effect“.	

User:	London Borough of Waltham Forest

We support this policy. Reference should also be made to the value of providing high quality, usable public space in major developments.

User: HFFTRA

D7 Public realm

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User:	London Borough of Hillingdon

The policy should include a reference to ensure that public realm includes green infrastructure to support rainwater management through sustainable drainage.

User:	London Borough of Hackney
Hackney welcomes the more rigorous analysis of the impact of development on the public realm and the detailed proposals for creating world class public realm in the all London boroughs	

User:	Marion Lerminiaux

I welcome the reference to urban greening in Policy D7 Public Realm. This should include a broader commitment to, and requirement for, conserving and restoring urban nature rather than the current common approach to installing trees in concrete or tubs and planting of low nature value.

User: Westminster City Council

The importance of securing an attractive and robust public realm to support increased development densities is supported.

The planning system can have only a limited role in establishing how public spaces are managed (paragraph 3.7.9). In many cases this is a matter governed by the terms on which spaces have been made available (in some cases dating back centuries) or by local legislation or byelaws where the Mayor has no locus. In some cases – particularly in some areas of Westminster where these spaces often have national significance and particular sensitivity as a result, there is a need for rules on public access going beyond those “essential for safe management of the space”, which does not address adequately the huge variety of spaces and circumstances that will be found across Greater London. This paragraph goes some way beyond matters of spatial development and the planning system and should be deleted.

Whilst the sentiment of criterion D7H is supported, it will not be appropriate in all circumstances to incorporate green infrastructure into the public realm. This section could be improved with the addition of “wherever appropriate”.

User: InLinkUK

Policy D7 Public realm

As seen with the extensive provision of free public Wi-Fi in cities throughout the world, considerations of digital connectivity are an important element in the provision of successful public realm improvements.

Connectivity in cities should be multi-layered and accessible for all. From public Wi-Fi to good mobile coverage, everyone in London should be able to go about their daily lives with the best possible digital connectivity.

There is an increasing expectation for connectivity anywhere, therefore be definition we require connectivity everywhere. Which includes custom solutions for higher concentration areas, to ensure a basic service can be preserved even at peak times.

Recommendation #14

? That Policy D7 be updated to ensure Development Plans and development

proposals should consider the provision of digital connectivity in the area.

As displayed by our approach to remove two payphones for each InLink installed, we are particularly supportive of the removal of any unnecessary or dysfunctional clutter or street furniture to ensure the function of the space and pedestrian amenity is improved. Similarly, planners should be provided with sufficient information to effectively consider (and base decisions upon) how any proposal does or does not improve pedestrian amenity.

Recommendation #5 (repeated)

? The London Plan should reflect that anything added to the streets of London should be associated with a net-increase in available pavement space and not unreasonably disrupt the movement of pedestrians.

User:	London Borough of Southwark

The council welcomes the attention given to aspects of the public realm that can support health and wellbeing including microclimate, public access, seating, drinking water, opportunities for play and the management of service entrances.

D7 H could be improved by requiring green infrastructure to benefit mental wellbeing as well as the functions listed.

D7 B and L seek to manage the impacts of on-street parking. The New Southwark Plan restricts new car parking on the public highway. Southwark's Kerbside Strategy will deliver better management of our kerbside space to prevent and reduce road traffic collision, support a more active population, reduce traffic congestion and improve air quality. D7 B and L could give greater support for boroughs that are going further to reduce the negative effects of car parking.

User: London Borough of Wandsworth

The Policy is supported overall. However criteria D7 D should stress the importance of creating pedestrian and cycle friendly spaces in identified areas such as town centres.

D7 H refers to incorporating green infrastructure into the public realm but the strategic urban design importance of London’s Squares, Avenues and Boulevards (i.e. The Mall) is not explored.

D7 G refers to the Public London Charter. It is understood that the Mayor will be preparing guidance on this to set out the rights and responsibilities for users, owners and managers of public spaces. It is crucial that this will need to be prepared involving London Boroughs and a plethora of organisations involved in public realm matters.

User: The Northbank BID

Policy D7: Public Ream, D10: Safety, security & resilience to emergency

We support policies D7 and would like include the needs of future technology, area management to reduce crime and antisocial behaviour. Area resilience is a high priority for Northbank area to ensure businesses and people are safe.

- Funding
- Working with Boroughs and BID as driver for public realm enhancements
- Public realm design that encourages sustainable choices and behaviour change

D7: The River Thames
It would also be beneficial for the management of the River Thames and the Thames walkways, if their role in the public realm was acknowledged here. Although the statement in para 9.14.8 (p 367), that the River Thames should not be designated as Metropolitan Open Land, is welcome and this should remain the position, a statement here about the role of the River Thames would be appropriate.

The River Thames is the defining landscape, historic and natural feature of London. We believe it should feature more strongly in London Plan policies and that more emphasis is given to addressing routes along it and the positive economic, social and environmental contribution it makes. The London Plan has a particularly important role in providing a coherent approach given the Thames passes through so many boroughs.

We welcome that “use and enjoyment” of the Thames is identified as a strategic function of the Central Activities Zone and some protection afforded the Thames from tall buildings in Policy D8 and in strategic views (Policy HC3). Policy SI14 is especially welcome in encouraging the identification of Thames Policy Areas. We recommend that Policy D7 is amended explicitly to recognise the importance of the public realm provided by and along the Thames, including specific reference to the need for expansive, continuous public access to the riverfront. The River’s potential in terms of freight movements should also be recognised and supported at appropriate points in this draft London Plan.

User: London Borough of Richmond Upon Thames

The policy identifies a broad range of considerations that should be taken into account in the design and delivery of the public realm, and is generally supported.

The recognition that the public realm consists of a network of spaces (potentially serving different uses at different times) is welcome. However, the policy takes a broad definition of what constitutes London's public realm, including shopping malls, sky gardens, and viewing platforms (see paragraph 3.7.1). This is broader than the definition of the public realm in Richmond's Local Plan. In instances where improvements to the public realm are sought at a local level as part of a development scheme, it is not intended that these should be provided in the form of the above amenities, particularly where they might be inaccessible from street level (e.g. sky gardens) or support a specialist function (e.g. shopping malls). Instead, the policy should recognise the strategic urban design importance of more traditional and accessible forms of public space – such as streets, squares, parks and open spaces.

The importance of creating pedestrian and cycle friendly spaces in identified areas (such as town centres) should be emphasised in Part D.

The inclusion of appropriate management and maintenance arrangements to protect the open use of the public realm, as established through the forthcoming Public London Charter, is welcomed. The document should be prepared in conjunction with London Boroughs and other organisations concerned with public realm matters.

User: London Borough of Harrow

The overall principles behind the policy are supported.

The draft policy however does not sufficiently recognise ongoing maintenance requirements of public realm and the pressures on public finances to maintain the quality of spaces in the longer term, which is sometimes harder to achieve than the initial capital sum of installation. A whole-of-life approach to design, materials selection, construction and maintenance should be included within the policy to ensure that adequate arrangements are in place for ongoing maintenance (including, for example, ensuring materials can be readily sourced in the future to avoid different materials being used for ad-hoc repairs, thereby diminishing the ongoing quality / design integrity of the public realm).

There could also be a greater emphasis specified around relationship between ‘cleaner, greener, safer’ theory. This is that a cleaner and greener location creates increased feelings of safety. So design from the outset should be around ensuring increased cleanliness and greenery is important. This also relates to street furniture and ‘seating’ as this can also create an area for anti-social behaviour and enviro crime. Areas for community members to meet is also essential, it needs to be designed in the right way and area to ensure a reduction of anti-social behaviour opportunities. Lighting is also a critical element of this.

User: London Borough of Havering

The draft London Plan should also include reference to the potential for well designed and maintained public realm to promote and enhance mental health and wellbeing.

The draft London Plan should recognise the importance of maintenance of the public realm. Development proposals should consider that future methods of street cleansing of the public realm will likely be cleaned mechanically. The draft London Plan should reference the importance of construction methods for footways and public spaces being constructed sufficiently to accept vehicle weights.

User:	Royal Borough of Greenwich

Support the approach and criteria set out in the policy. While it is wide-ranging, we agree with the view that the quality of the public realm has a significant influence on quality of life and it is therefore appropriate and necessary to consider the matters set out in the policy, particularly in areas of high density development.

User:	Expedition Engineering and Useful Studio
Consideration should be given to making reference to public realm materials with regard to quality, sustainability and where appropriate permeability.	

User: London Borough of Harrow

SI7: Reducing waste and supporting the circular economy

The Council supports this policy but notes that greater emphasis on the reduction of non-recyclable materials could be given to assist in waste reduction, and specifically single use plastics. This should be added in and, linked into Policy D7M (Public Realm) and support paragraph 3.7.11. Additionally, the use of materials that are of a high quality, allowing a longer life span, and higher frequency of recycling could also be further promoted.

User:	London Borough of Harrow

SI13: Sustainable drainage

The Council supports this policy.

Policy should link to other policies where these present opportunities for sustainable drainage i.e. Policy G7 Trees and woodlands and Policy D7 Public Realm.

User: Judith Howard

Making London greener is essential for people’s health and wellbeing. Yet many local green spaces face pressure from new development. The Plan must recognise that loss of green space cannot always be made up for through green roofs and sustainable drainage schemes, valuable though these features are (para 4.2.9). Policy should make clear that provision of and access to green space should always be considered when planning new development.

I welcome the reference to urban greening in Policy D7 Public Realm. This should include a broader commitment to, and requirement for, conserving and restoring urban nature rather than the current common approach to installing trees in concrete or tubs and planting of low nature value.

User: Mr Joe Ward

The policy on noise should make explicit reference to the need to reduce the impacts of noise on green space and the wider public realm, and other relevant policies amended accordingly.

Proposed change:

Policy D7 should be strengthened by adding a new sub-section after A) stating Development Plans and development proposals should: **Take account of the need to protect and enhance the relative tranquillity of the public realm, particularly parks and green spaces and quiet walking and cycling routes.**

Additions should also be made to Policy D13 Noise as follows:

Para B: Boroughs [etc] should identify and nominate new Quiet Areas and protect existing Quiet Areas in line with the procedure in Defra's Noise Action Plan for Agglomerations **and ensure local green space is improved in line with Policy G4 (as amended) including by:**

· **taking action to reduce traffic noise around parks which are severely impacted by traffic noise and pollution, using such measures as temporary/weekend street closures and/or permanent re-routing of traffic; or introducing natural or man-made noise barriers.**

User:	The Wimbledon Society
D7: The GLA should seek legal powers to allow Councils to install street lighting etc onto buildings, as is now the case in the City of London; this would minimise street clutter	

User:	(FOE) Friends of the Earth England Wales and Northern Ireland

We welcome the reference to urban greening in Policy D7 Public Realm. However, this should include a broader commitment to, and requirement for conserving and restoring urban nature, including as an integral part of and alongside new development, rather than the current common approach to installing trees in concrete or tubs and planting of low nature value. We suggest the policy refer to the need to retain 'mature trees'.

User: London Borough of Newham

LBN are generally supportive of this policy which is complementary to Newham's Draft Revised Local Plan. Emphasis on meanwhile uses in public realm at phased developments is an interesting innovation (paragraph K) as is greater recognition of the 24 hour nature of such spaces.

It is however suggested that the D7 Part A is amended to require the incorporation of "appropriate quality design" rather than the "highest quality design" or at least wording that reflects the need for the public realm to be serviceable and can be adequately maintained, without abnormal costs, particularly where the maintenance of that area is the responsibility of a local authority. Generally also, while high quality design including durability is important, in a scheme, it may also be more appropriate to direct the extra expenditure related to the 'highest' quality street furniture etc to other aspects of street furniture.

The emerging 'Public London Charter' is supported in principle, notably the drive to ensure that the public realm offers the highest level of public access. However, this must be balanced against issues around safety, effective management and maintenance of such spaces. The council would welcome greater detail on the rules and restrictions on public access as set out in the charter, and seek further engagement and consultation with the Mayor on its design.

User:	Berkeley Group

Public Realm
4.11. Through our developments we deliver substantial public realm including new parks and squares. We design the public realm to be inviting and enjoyed by all. We would welcome the opportunity to work with the Mayor’s team in preparing the Public London Charter, drawing on our experience of delivering and managing public realm across London.

User:	London Borough of Enfield - Public Health

The provision of free water fountains is welcomed as a cooling feature, focus of interest, a means of reducing use of plastic. However, it should not be used as a means of promoting the myth that people need to constantly drink in order to remain healthy.

User:	John Innes Society

Policy D7 We generally support this policy but Policy D7 H should make it clear that chemical pollutants should not be used on green infrastructure in the public realm.

User: HTA Design LLP

In line with the healthy street approach woven throughout the plan it is good to see a strong emphasis on good design of the public realm, including a particular focus on the experience for pedestrians and cyclists.

We also support the intention set out by the Mayor of creating a ‘Public London Charter’ to ensure that privately owned public space can contribute to broader aspirations such as encouraging active travel. It is also good to see consideration given to the effective management and ongoing maintenance of public realm. This is another good opportunity for boroughs to think more strategically and proactive about the future of their areas, and it could be incorporated in design codes for specific areas.

User: Just Space

D7 Public realm

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

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

D 7 I "Ensure that shade and shelter are provided …"
Just Space suggest inserting **…and sunlight throughout the year in parts of the space**

User:	London Borough of Bexley

Policy D7 Public realm is a more detailed policy than its iteration in the current London Plan (Policy 7.5 Public realm). In this respect it is a counterpart to **Policy D1** and it seeks to ensure that the conditions are created to support a number of desired results. The policy lists 13 ambitions that development plans and development proposals should accomplish with regards to public realm. These represent a strong recipe for the creation of safe, comfortable, and vibrant spaces which serve the varying needs of a range of people throughout different times of the day and the year. It is recommended that two additional ambitions are considered: to create and retain natural features; and, to have regard to existing identity and context, which should inform and inspire the way public realm is designed and how it functions.

User:	Rebecca Rose

I welcome the reference to urban greening in Policy D7 Public Realm. This should include a broader commitment to, and requirement for, conserving and restoring urban nature rather than the current common approach to installing trees in concrete or tubs and planting of low nature value.

User: Mr Liam Kelly

A ‘Social Infrastructure Accessibility Level’ matrix should be developed and adopted in the London Plan, setting out what services and amenities should be within (a) a walking distance from home, (b) a short bus or cycle ride from home, and (c) a train, tram or tube journey from home. Community and social infrastructure should be protected, gaps in existing provision should be addressed and sufficient should be provided in new developments (including financially accessible community spaces) to meet the additional need. Where existing uses are no longer appropriate, community organisations should be prioritised as potential new occupants.

New developments should not be able to take over or prevent free public passage/ right of way in adjacent proximity.

Policy 3.7.1 needs to be included in the shaded box to clarify the definition of publically accessible open space between buildings whether publically or privately owned, including the Thames and London’s waterways

Community Spaces must be a high priority in the London Plan. There should be sufficient infrastructure associated with every housing development, doctor’s surgeries, schools, children’s & youth facilities parks and green space to facilitate socialising, networking and community building.

User:	Just Space
The Healthy Streets Approach should make more explicit attention to the protection and enhancement of mobility needs and that this should be expressed in policies **T2 and D7 Public Realm**.	

User: Federation of Small Businesses

Local businesses are at the heart of a community and play a vital role ensuring that the community continues to thrive. The provision of accessible parking, within a sustainable transport plan, is integral to the success of local shops and businesses, especially away from central London and in the outer Boroughs. It is the first experience that consumers travelling by car have when they arrive, and the last that they have when they leave. FSB are therefore keen for borough parking policies to actively encourage visitors whilst recognising public transport, cycling and other means of travel as well as meeting the needs of local small businesses.

In response to an FSB Freedom of Information request to ascertain how much Business Parking Permits have increased across London Boroughs since 2006 – the average single vehicle increase across the boroughs is a staggering **81 per cent over 10 years** – well above the rate of inflation for that period.

Recent FSB data shows that almost half (51 per cent) of FSB London members say that parking costs have a significant impact on the success of their businesses.

The value of local High Streets to local communities must be recognised and Councils should alter business parking policies to support local small businesses.

Parking provided to support high street businesses should retain a good balance of short- and long-stay parking to ensure that sufficient parking is available for customers.

Consider allowing use of residential parking spaces by customers of local shops to promote local economic growth (during periods when they are not being used by residents).

User:	Federation of Small Businesses

Parking provided to support high street businesses should retain a good balance of short- and long-stay parking to ensure that sufficient parking is available for customers.

Consider allowing use of residential parking spaces by customers of local shops to promote local economic growth (during periods when they are not being used by residents).

User:	London Healthier Places

The LHP Network strongly support the requirement to maximise the contributions of the public realm to encourage active travel and discourage car usage. The Healthy Streets indicators will help to assess the quality of the public realm associated with a new development.

The LHP Network welcomes the provision of free drinking water fountains: this will help reduce single-use plastic bottles and will support public health initiatives to reduce fizzy drinks consumption.

The LHP Network also welcomes the provision of seating, shade and shelter as this will encourage use of outdoor space.

User:	Rosalind Readhead
The London Plan must include dedicated play streets across London.	

User:	Revo

We fully support the Mayor’s draft policy for helping to ensure that the city’s public realm contributes to sustainable growth and to the wellbeing of its inhabitants. We encourage Local Authorities, the GLA and the private sector to work in collaboration to achieve their common goals through available vehicles such as business fora, BIDs and other mechanisms and to ensure effective dialogue with local stakeholders and build cohesive environments.

User: London NHS Clinical Commissioning Group

Policy D7 Public realm

We support Policy D7 as the public realm makes an importance contribution towards active travel (clause B of the policy), safety and natural surveillance (clause F), green infrastructure (clause H), shade and shelter and seating (clause I) formal and informal play and social activities (clause K) and free drinking water (clause M). Paragraph 3.7.3 notes that 80% of the public realm in London is in the form of streets and roads. However, it is unclear whether the Healthy Streets Approach (see paragraph 3.7.4) would apply to all public realm and how the ten Healthy Streets indicators relate to the criteria in Policy D7. We suggest that the wider contribution of public realm to health and wellbeing could be addressed through the use of health impact assessments.

Public access and use of public realm in private ownership is an important issue and we support the commitment to produce a ‘Public London Charter’ which help should ensure that public access and use is maintained irrespective of land ownership

User:	Association of Local Government Archaeological Officers (ALGAO)
Welcome reference in part A to public realm relating to historic context	

User:	Chartered Institute of Architectural Technologists

Policies D7, D8, D9, D10, D12 & D13

We are in agreement with the proposals contained in the plan.

User: CPRE London

Noise and green space

The policy on noise should make explicit reference to the need to reduce the impacts of noise on green space and the wider public realm, and other relevant policies amended accordingly.

Proposed change:

Policy D7 should be strengthened by adding a new sub-section after A) stating Development Plans and development proposals should:
Take account of the need to protect and enhance the relative tranquillity of the public realm, particularly parks and green spaces and quiet walking and cycling routes.

User:	Notting Hill Housing Trust

NHHT is supportive of the creation of well designed and inclusive public realm. We would reiterate the comments made under Policy D6 Optimising housing density in respects to Part G.

User: British Property Federation

We fully support the Mayor’s draft policy for helping to ensure that the city’s public realm contributes to sustainable growth and to the wellbeing of its inhabitants. As we increasingly discuss higher densities in identified areas, the importance of vibrant and well-designed public realm becomes ever more significant. The nature of London’s public realm is that it will often fall under the remit of both private and public responsibility. To this end, considerations around delivery, as well as ongoing management and maintenance, can be complex and we encourage the boroughs, the GLA and the private sector to work in collaboration to achieve their common goals. We also acknowledge that this collaboration includes engagement and dialogue between neighbouring land owners and local planning authorities when undertaking spatial planning, to ensure that development proposals/sites are not delivered in isolation and are connected for the benefit of public access and cohesion, and to create positive character.

User: Town and Country Planning Association

Policy D7 Public Realm

3.6.7 The TCPA supports this policy and believes, taken as a whole with other policy areas for sustainable transport, health and wellbeing, safety and economic vitality, it has the potential to transform the quality of the built environment for pedestrians and users, and help achieve multiple strategic and local objectives on quality.

User:	Hammersmith and Fulham Historic Buildings Group

D7 I Street clutter
It is our belief that as a result of mass mobile phone possession that applications for alleged street telephone units are in fact an opportunity to display advertisements on the pavements, and as such should be resisted.

User:	London Wildlife Trust

We welcome and support Policy D7, particularly the points under Part H.

User: Canal & River Trust

Paragraph 3.7.1 explains that waterways are considered as part of the public realm. We welcome much of policy D7. Through its implementation, new development and investment can help to deliver improved waterway environments that are safe, accessible, inclusive, attractive, well-connected, relate to local and historic context and incorporate the highest quality design, which, amongst other things, point A requires.

We also welcome the recognition that the public realm can encourage active travel. In terms of waterways and their towpaths, their full potential for improved connectivity needs to be realised through treating them as a strategic resource rather than just a collection of connected public realm spaces. This is why we continue to believe that improving blue and green infrastructure should be as much a part of the Healthy Streets agenda as improving traditional streets. We return to this issue in our response to the 'Transport' chapter.

We particularly welcome point E, which seeks to:

"Ensure there is a mutually supportive relationship between the space, surrounding buildings and their uses, so that the public realm enhances the amenity and function of buildings and the design of buildings contributes to a vibrant public realm".

Where the Trust's waterways are concerned, we strongly believe that developments and uses on land and water should be mutually supportive. The relationship between them is vital to create great waterway places and we suggest that the water should be the starting point for design strategies for developments close to waterways. This is consistent with the advice set out in the Town & Country Planning Association and British Waterways' Policy Advice Note on Inland Waterways. However, we question whether policy SI17 is inconsistent with this aim. We suggest below that changes to that policy are required.

Part F of policy D7 states that 'consideration should also be given to the local microclimate created by buildings, and the impact of service entrances and facades on the public realm'. Whilst we welcome the recognition of the need to consider the local microclimate, we suggest that this does not provide a clear indication of how a decision maker should react to a development proposal once the issue has been considered and, as such, is not consistent with para 154 of the NPPF. We suggest that many of the tests included in policy D8 (C) that relate to the functional and environmental impact of tall buildings should be equally applicable to all developments that may have a significant impact on the public realm and should be included in policy D7.

User:	London Environment Directors' Network (LEDNet)

Policy D7 Public realm

H Incorporate green infrastructure into the public realm to support rainwater management through sustainable drainage, **ensure no increase in air pollution levels**, **reduce air pollution and** exposure to air pollution, manage heat and increase biodiversity.

N **Ensure the provision of appropriate waste and recycling infrastructure.**

User:	313-349 Ilderton Road LLP

Policy D7 Public realm defines public realm as all the publicly-accessible space between buildings, whether public or privately owned, from alleyways and streets to squares and open spaces, including the Thames and London's waterways. The policy sets out measures for development proposals to adhere to.

The provisions within the policy are generally acceptable.

User:	Jayshree Bakrania

I welcome the reference to urban greening in Policy D7 Public Realm. This should include a broader commitment to, and requirement for, conserving and restoring urban nature rather than the current common approach to installing trees in concrete or tubs and planting of low nature value.

User:	Benhill Residents

We feel that it should be made clear in policy that new developments should not take over or prevent free access to rights of way (between buildings, whether public or private……London Waterways - paragraph 3.7.1.) We fear this is a problem in terms of routine appropriation of public realm areas for expensive café and restaurant areas along the Thames. This may make such areas ‘vibrant’ for some, but also inaccessible and exclusive to others. We propose that such areas should be provided for within the footprint of the development to prevent difficulties for others accessing public rights of way.

User: Elaine Chambers

D7 Public realm

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User: Earls Court Public Sector Tenants' Assoc

We feel that it should be made clear in policy that new developments should not take over or prevent free access to rights of way (between buildings, whether public or private……London Waterways - paragraph 3.7.1.) We fear this is a problem in terms of routine appropriation of public realm areas for expensive café and restaurant areas along the Thames. This may make such areas ‘vibrant’ for some, but also inaccessible and exclusive to others. We propose that such areas should be provided for within the footprint of the development to prevent difficulties for others accessing public rights of way.

User:	Silvertown Homes
Part I of Policy D7 states that ‘Applications which seek to introduce unnecessary street furniture should normally be refused.’ This is a disproportionate detailed statement and should be removed.	

User:	Living Streets

We support the policy statement setting out the requirements of the design of the public realm. We support the definition of the public realm and strongly support the link to Healthy Streets approach.

User:	Diabetes UK

We would support this. Planning processes must ensure that the importance of a health promoting environment is incorporated. We know that many adults and the majority of children are not meeting the Government's recommended physical activity levels. There needs to be more done across London to review the provision of services offered by London Boroughs that increase physical activity and inform the public about the recommended levels of activity. Services offered should be inclusive of all age groups, recognise different health needs and be culturally appropriate.

User:	Historic England
We welcome the requirement in Part A for consideration of how the public realm relates to local and historic context.	

User:	HB Reavis UK Limited

HB Reavis supports policy DP7 which states that development proposals should contribute to the achievement of high quality public realm. We support policy text which states that proposals should be based on an understanding of how the public realm in an area functions […] and where barriers to movement create severance for pedestrians and cyclists (in order to improve these).

User:	West London River Group

We support the principles on the importance of public realm as identified in A?M.

User:	West London River Group

We support the inclusion of the River Thames and the valuable contribution it makes to the public realm as a continuous, connected space and route throughout London, making a unique contribution to the Healthy Streets Approach through the Thames Path.

User:	West London River Group

We endorse public access to areas of public realm in particular access to the Thames including the Thames Path.

User:	London Property Alliance

The Alliance reserves the right to comment on the implications of Policy D7(G) and
Paragraph 3.7.9, and its ability to be secured via legal agreement, for a date when the Public London Charter is available. We await the opportunity to comment on this new Character document.

User:	PAFH - Physical Activity for Health (London Sport)

We strongly support these – and other – policies that seek to maximise walking and cycling in the public realm, that reduce barriers to active travel, and that minimise car use (including limiting residential/street parking)

User: Barratt Developments plc

Policy D7 refers to the ‘highest quality’. This is a subjective statement and is not defined. Part I of Policy D7 states that ‘Applications which seek to introduce
unnecessary street furniture should normally be refused.’

The London Plan must provide more clarity on what is sought from the public realm and avoid subjective terms such as ‘highest quality’. It must be explicitly acknowledged that the cost of publicrealm works must be borne by the development as a whole and will impact upon the delivery of wider benefits, including affordable housing. The statement on street furniture is disproportionately detailed and should be removed.

User:	Peter Lawrence

I welcome the reference to urban greening in Policy D7 Public Realm. This should include a broader commitment to, and requirement for, conserving and restoring urban nature rather than the current common approach to installing trees in concrete or tubs and planting of low nature value.

User:	Vital OKR

Policy D7 regarding public realm should make reference to the needs for goods access, and the appropriate shared use of space that provides goods access. It is important that the London Plan says something supportive about public access and shared use operational yards, and the ongoing presence of goods servicing activity on public streets. Reference could usefully be added as a new point in Policy D7, and could be added to para 3.7.3.

User: Natalya Palit

Draft Policy D7 of public realm refers to ensuring that design adequately considers how the public realm can create barriers to movement. It is appreciated that this policy is included within the design chapter, however further consideration should be given to also encapsulating guidance around the *management* of public space within private ownership (commonly referred to as ‘PoPs’). The intention of producing a Public London Charter to address this issue is strongly supported. The details of the proposed public consultation of this proposed Charter should be publicised prior to the publication of the next iteration of the Draft London Plan. Whilst is acknowledged that delivery and maintenance of public space through PoPs may offer some benefits, i.e. coherent management of the entire public realm and diverse space and events programming, careful consideration should be given to the detail of how PoPs are managed. In developments which bring forward public space and routes through sites to delivery greater connectivity and permeability the Mayor should ensure that the design of schemes and subsequent legal obligations allow cyclists to ride through routes through sites, as well as creating pedestrian routes. I would strongly urge the Mayor to take this into consideration, as to not do so would directly go against the intention to create a more liveable city with a more healthy active and connected streetscape.

User:	Natalya Palit

The aspiration of increased provision of free drinking fountains set out in paragraph 3.7.11, to reduce single-use plastic waste is strongly supported. The Mayor should consider how these will be secured and maintained in the longer term. Boroughs have limited resources, which are focused on high priority areas such as housing provision and job growth. The Mayor should give consideration to requiring boroughs to identify potential locations for planned regeneration areas for which Area Action Plans or other forms of planning framework are to be produced.

User:	London Borough of Sutton

OBSERVATION. The London Borough of Sutton broadly supports Policy D7 Public Realm, however, the council considers that much of the policy includes detail design matters which are not strategic issues and should be addressed at a local level.

User:	The Forestry Commission

D7 Public Realm - trees offer some of greatest opportunities to enhance public realm, increase their usage and nudge behaviours e.g. tree lined streets will encourage walking and cycling. Reduction of future car parking should provide increased tree planting and street enhancement opportunities.

User: Old Oak Park Limited

Whilst we support meanwhile uses, we do not consider that they are always appropriate or possible, and we would discourage a move towards seeking to impose tighter controls on them as this could have the opposite effect of the draft policy's intention. Part of their attraction is their ease and temporary nature, and there is a likelihood that landowners will be discouraged from doing them if requirements are then imposed on them in terms of their longevity and other 'obligations', as specified at paragraph 3.7.12. Meanwhile uses are only appropriate in limited situations. Often, particularly on constrained sites, land is required for logistics to deliver the permanent development, and the introduction of meanwhile uses could serve to disrupt or delay delivery.

RECOMMENDATION: Delete the requirement to establish parameters for meanwhile uses at the outset.

User: Argent (Property Development) Services LLP

Draft Policy D7: Public Realm

We note that this policy requires the ‘highest quality design’ for public realm, whereas the NPPF (paragraph 56) refers to ‘good quality design’. Indeed other policies in the plan, such as draft Policy D2 (delivering good design) similarly refer to good quality design. Consequently, the wording of draft Policy D7 should be revised to be consistent with the NPPF and other proposed draft policies.

User:	Centre for London

Policy D7 Public realm

Street Smarts: Report of the commission on the future of London's roads & streets (2017) argues for kerb space hierarchies to avoid excessive car parking and enable easy access for pedestrians:

- "TfL and the boroughs should agree new kerb space hierarchies to govern parking and kerb space allocation and undertake regular local reviews."

User: One Housing Group

Draft policy D7: ‘Public realm’

This requires the ‘highest quality design’ for public realm, whereas the NPPF (paragraph 56) refers to good quality design. Indeed other draft policies in the plan, such as draft policy D2 (delivering good design) refer to good quality design. It should be revised to be consistent.

User: CFGN Community Food Growers Network

The Community Food Growers Network supports the following comments drafted by the Reclaim Our Spaces coalition, in reference to:

We strongly support the inclusion into policy of access to free drinking water, recognising its' environmental and health benefits.

This addresses growing public concern over consumption of high sugar drinks (obesity, diabetes, dental health) and the environmental impact of single-use plastic bottles (litter, carbon intensity, marine pollution).

User: North London Waste Authority

- At present this policy does not include any reference to waste or recycling infrastructure; NLWA recommends that it needs to. This is to ensure that habits and messages promoted in the home environment are repeated and continued outside of the home - behavioural change is likely to be more effective if messaging is consistent both inside and outside of the home. And well designed communal recycling within the public realm can help ensure this consistency.
- Where the public realm is green space, guidance should then be provided as to which policies prevail across the chapters in the NLP.
- NLWA supports policy 07 M to support the provision and future management of free drinking water at appropriate locations. However, NLWA requests that more detail is developed with boroughs and incorporated into the final NLP e.g. regarding responsibilities for provision, timescales and targets etc. (We also consider that this detail should be reiterated in para 3.7.11).
- Although the provision of drinking water fountains would take away a recycling opportunity for single-use plastic water bottles, our interest and London's should be in following the waste hierarchy with prevention followed in preference to recycling. NLWA observes a potential conflict here between the NLP requirement for development plans and proposals to ensure the provision and future management of free drinking water at appropriate locations in new or redeveloped public realm i.e. increased waste prevention and a higher recycling rate. NLWA addressed this in its response to the draft LES, where we recommended the Mayor adopts a target to reduce the amount of residual household waste arising rather than a target for increased recycling. This would remove the tension between more waste prevention and more recycling .

User:	Blackheath Society

Policy D7 Public realm: We support the aspirations underlying this policy. In reality however we are threatened in Lewisham with an erosion of the existing public realm/open space through excessive development, including clusters of excessively tall buildings. The aspirations reflected in this policy need to be given statutory teeth to enable encroachment on the existing public realm and inadequate attention to this in future development to be actively challenged.

User:	Landscape Institute London
3.1.4, 3.2.8, D7 A and elsewhere - the word ‘landscaping’ should be replaced by landscape treatment, equivalent to ‘architectural treatment’. ‘Landscaping’ is a catch-all term with little meaning. Also it implies that ‘landscaping’ is detached from other elements and potentially seen as an optional add-on. If more planting is meant, then say so.	

User:	London Borough of Ealing

The Council supports this policy and welcomes the encouragement of free drinking water in new or redeveloped public realm.

User:	Landscape Institute London

LI London considers that the population’s needs (not to mention carefully planned improvements to existing public parks) are a vital element of London’s green infrastructure. LI London requests that this be rectified and in some detail to match the existing clauses on design of town centres, highways and incidental landscape treatment currently described.

Throughout the entire ‘public realm’ section, the only mention of public parks is in a note referring to public drinking fountains (3.7.11). Excellent design of new public parks and greenspaces is vital if London is to meet the needs of an increasing population. As a minimum there should be cross-referencing to Chapter 8.

User:	Landscape Institute London

B and C – LI London considers that it is important to achieve a balance and hierarchy of spaces and movement – otherwise one use can dominate another e.g. running a busy cycle route through a quiet area of greenspace needs care to avoid loss of tranquillity and severance of pedestrian areas, such as the Hyde Park cycle lane.

User:	Landscape Institute London

LI London advises that the last sentence requires clarification. It is agreed that applications solely to introduce ‘unnecessary street furniture’, such as advertising signs and free-standing cash machines should be refused. For larger developments, it would be more appropriate to include a simple statement recommending developers minimise street clutter and give careful thought to the use, design and location of street furniture.

User:	Landscape Institute London
J – LI London is unclear why ‘open street events’ are innovative. There are better examples of innovation, such as ‘smart city’ developments.	

User:	Landscape Institute London

LI London welcomes the principle of water fountains for health benefits and to help eliminate single-use plastic, but there is no funding available to councils to maintain them and they become vandalised and out of order, quickly frustrating local people. There is a similar issue for public toilets which become sites for anti-social or criminal activity.

User:	Landscape Institute London
3.7.1 – LI London considers that this clause should include specific mention of parks as well as squares and open spaces: see chapter 8 definitions. ‘Open spaces’ is not another word for ‘parks’.	

User:	Landscape Institute London

3.7.3-3.7.4 - LI London is concerned that quiet residential streets are predominantly used for parking throughout London. Boroughs, and developers, must be persuaded to ensure shared streets are kept free of cars in the long term, for example by refusing permission for car parking within developments. ‘Home-zones’ have been trialled in the UK for 20 years but the concept has failed to work in many locations due to the perception that the public has an overriding love of private cars, although car use is actually declining20. Car ownership is only around 30% of households in some boroughs. LI London supports the Mayor’s Healthy Streets Approach.

Some boroughs, e.g. Islington require car-free development in some instances, and car free development was already in the previous London Plan (policy 6.13). This may be more acceptable in inner-city than the suburbs. Better public transport, more car clubs, more home deliveries and high parking permit fees can all help to discourage private car ownership.

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Some boroughs, e.g. Islington require car-free development in some instances, and car free development was already in the previous London Plan (policy 6.13). This may be more acceptable in inner-city than the suburbs. Better public transport, more car clubs, more home deliveries and high parking permit fees can all help to discourage private car ownership.

User:	Landscape Institute London

3.7.8 - LI London considers that this clause is unclear and needs rewording. Whilst the concept is admirable, clarification is needed as to how can this work – all developments will affect neighbouring public realm and local authorities are restricted as to how they can require a developer to mitigate this. S106 and the Community Infrastructure Levy (CIL) may be requested, and in some cases used, but what if the adjacent ‘public realm’ is privately owned? Nearby locations may be suggested where the borough considers there is a deficit/need, but this doesn’t help the immediately affected locations.

User:	Landscape Institute London
3.7.10 - LI London considers that whilst safety is paramount, the lighting of open spaces be carefully reviewed as it is beneficial to maintain 'dark sky' areas e.g. public parks for the benefit of wildlife e.g. bats and birds, in addition to reducing light pollution..	

User:	Landscape Institute London

LI London welcomes the principle of water fountains for health benefits and to help eliminate single-use plastic, but there is no funding available to councils to maintain them and they become vandalised and out of order, quickly frustrating local people. There is a similar issue for public toilets which become sites for anti-social or criminal activity.

User: Arup Building Engineering Team

We support that the Plan acknowledges the importance of the local microclimate but this statement would benefit from a clearer, stronger definition of microclimate and what topics it includes. Buildings should not adversely affect the local microclimate to the extent that conditions become unsuitable for the current or intended activities of the public realm. Microclimate should include, for example, wind, air quality, sunlight, daylight and noise. 'Microclimate' should be added to the list of definitions at the end of the Plan.

Wind is explicitly referenced in Policy D8 but adverse wind conditions are not only caused by tall buildings. The impact on levels of windiness can be affected by the geometry of the building, interaction with surrounding buildings and sensitivity of the public realm activities. Limiting reference to wind to the tall buildings policy could be interpreted as there not being potential adverse effects from buildings that are not considered to be tall.

User:	Hoare Lea LLP`
In addition to the measures identified, and in order to ensure public realm contributes to an active lifestyle public realm should be designed to incorporate the Principles of Active Design as championed by Sports England.	

User:	Natural England

We support part H of this policy, which makes provisions for development proposals to incorporate green infrastructure into the public realm to support rainwater management through sustainable drainage, reduce exposure to air pollution, manage heat and increase biodiversity. We would like to highlight that incorporating features of biodiversity interest into public spaces may encourage people to spend greater amounts of time in these areas, facilitating increased social integration and creating a sense of place, and **recommend** that this is listed as a benefit under part H.

User:	Natural England

Part K of this policy makes provisions for the use of meanwhile sites as temporary public realm. As per our comments on Policy H4, we support the use of meanwhile sites for community greenspace or allotments.

User:	Natural England
We support part L of this policy, which ensures that there will be space provided for green infrastructure within carriageways.	

User: CIBSE

We broadly support the objectives and the recognition of the role that the public realm, active street frontages and the incorporation of green infrastructure can play in helping and encouraging healthy, active, sustainable lifestyles and modes of transport. Good quality outdoor spaces are fundamental to environmental and health and wellbeing objectives, and this becomes even more critical in dense urban areas.

As noted in our response to policy D7, there is a potential conflict between this policy and the Plan's density objectives. We therefore think this policy should be strengthened, with clear objectives and possibly an overall "amenity strategy" for London, or for each Borough, or for both.

D7-F: We support giving consideration to microclimates and local conditions in the design of outdoor spaces, including daylight and sunlight access, especially for play areas to maximise their use and health & wellbeing benefits. For examples of such strategic considerations, we would refer to city planning by Hong-Kong8 and Stuttgart9 , which include local- to micro-climate considerations incorporating the impact of green infrastructure, land uses, massing etc. CIBSE would be happy to collaborate with the Mayor's team on this issue. We have a significant membership in Hong Kong who can contribute expertise. See also our response to policy D8 on the impact of tall buildings.

D7-G: We strongly support the importance of maintenance and management arrangements to be in place, and think more guidance should be provided to the Boroughs on this – see our comments in Chapter 8 Green Infrastructure.

D7-H: In order for this objective on green infrastructure to be delivered, it should be strengthened, at the very minimum by a clear reference to policies G1 and G5 and a strengthening of these policies – see more details in our responses to these policies and to Chapter 12 on Monitoring.

D7-L: We would welcome a review of the potential for the shared economy to free space currently allocated to individual car-parking spaces, with space becoming available in the future for other uses such as play areas, green space etc. This could include ensuring that new developments have a strategy in place for future reductions in individual car-parking spaces, and studies in existing areas e.g. housing estates, residential streets, retail parks. This also links to our comment on the reference to cycle storage under D4. CIBSE would be happy to collaborate with the Mayor's team on this.

D7-M: We support in principle the provision of free drinking water at key locations, as this can encourage active lifestyles and provide important health support during heatwaves; this should however not contribute to plastic waste (i.e. water should be provided by fountains, not plastic bottles), nor to water wastage (e.g. fountains could be activated by foot pedals, which are hygienic and limit water wastage).

User:	Sustrans
Sustrans welcomes the policy statement setting out the requirements of the design of the public realm	

User:	Sustrans
Welcome the definition of the public realm and strongly support the link to Healthy Streets Approach	

User:	Sustrans
Welcome the definition of the public realm and strongly support the link to Healthy Streets Approach	

User:	Hornsey & Wood Green Labour Party

We agree that the priority should be on connected routes, spaces management and preventing excessive street parking.

User: Mr Gary Hayes

D7 Public realm

We feel that it should be made clear in policy that new developments should not take over or prevent free access to rights of way (between buildings, whether public or private……London Waterways - paragraph 3.7.1.) We fear this is a problem in terms of routine appropriation of public realm areas for expensive café and restaurant areas along the Thames. This may make such areas ‘vibrant’ for some, but also inaccessible and exclusive to others. We propose that such areas should be provided for within the footprint of the development to prevent difficulties for others accessing public rights of way.

User: Mr Timothy Gill

Negative attitudes towards teenagers and young people should be redressed. Suggest the following wording for **Para 3.7.9**:

The effective management and ongoing maintenance of public realm should be a key consideration in the design of places and secured through the planning system where appropriate. Whether publicly or privately owned, public realm should be open, free to use and offer the highest level of public access. These spaces should only have rules restricting the behaviour of the public that are considered essential for safe management of the space. *Targeting teenagers and young people as being responsible for anti social behaviour is not acceptable. This age group should feel valued as part of the community and welcomed in all public spaces.* The Mayor will develop a 'Public London Charter' which will set out the rights and responsibilities for the users, owners and managers of public spaces irrespective of land ownership. The rules and restrictions on public access and behaviour covering all new or redeveloped public space and its management should be in accordance with the Public London Charter, and this requirement should be secured through legal agreement or planning condition.

User:	Redrow Homes London Division.
Part I of Policy D7 states that ‘Applications which seek to introduce unnecessary street furniture should normally be refused.’ This is a disproportionate detailed statement and should be removed.	

User:	London Parks and Gardens Trust

Policy D7 Public Realm

The Trust is pleased to note paragraph H but prefers a re-write as follows:

H ~~Incorporate~~ *Maximise* green infrastructure into the public realm to support rainwater management through sustainable drainage, reduce exposure to air pollution, manage heat, *provide informal play for children* and increase biodiversity.

User:	London Parks and Gardens Trust

Comment 3.7.11 – We welcome the aspiration to place free drinking water fountains within parks but urge that careful attention be paid to location and detailed design, most especially in historic designed landscapes. The Trust therefore suggest that these would best be encouraged either in new parks and designed green landscapes; or as part of a restoration of an existing park where a fountain existed previously so as to respect the historic integrity of the designed landscape.

User: Andrea Carey Fuller

We feel that it should be made clear in policy that new developments should not take over or prevent free access to rights of way (between buildings, whether public or private……London Waterways - paragraph 3.7.1.) We fear this is a problem in terms of routine appropriation of public realm areas for expensive café and restaurant areas along the Thames. This may make such areas ‘vibrant’ for some, but also inaccessible and exclusive to others. We propose that such areas should be provided for within the footprint of the development to prevent difficulties for others accessing public rights of way.

User: Lendlease

Creating the best places is at the heart of Lendlease's rational when delivering our schemes; we seek to place-make in a manner that strengthens what is valued in a place, whilst considering the liveability, environmental sustainability and longevity of a place. The delivery of high quality design and exceptional public realm is intrinsically linked to this and as such, we support the Plans draft policies seeking to deliver good design. In particular, we support the approach taken in relation to Review Panels and Masterplan Design Codes. We also place a heavy emphasis on community consultation and embrace new technologies such as Virtual Reality which has had a positive impact on collaborative workshops inside verified 3D models which is also highlighted in the draft policy.

We note that policy D4 now incorporates detailed design criteria from the Housing SPG. Whist we agree that the Minimum Space Standards should remain, the overly prescriptive wording is unnecessary and not suitable for a Strategic Plan. Such details should either be left for the Borough's to set out within their Local Plans or SPD's or such details should remain within a Guidance Document.

We acknowledge that the Density matrix has been removed. Whilst we generally support this approach, we would like to highlight that its use, particularly in outer London Boroughs is extremely beneficial when justifying higher densities, where such schemes are not as common. With the Mayor's strong approach to intensification and high densities and the focus of growth towards Outer London, it could be prudent to set minimum density expected in particular areas within the Outer London Boroughs.

It should be noted that density is just one characteristic of a development and should not be considered in isolation from other issues such as design quality, residential amenity and impacts on the surrounding environment. It is also not clear what such a management plan would require and how it would interact with other pre-existing requirements such as delivery and servicing plans.

We support the approach proposed in part (G) of draft policy D7 in relation to public realm management. We support the approach of the Public London Charter and Lendlease would welcome further discussion with GLA officers on this matter.

User:	Kent County Council

Amend Policy D7 to address resilience issues more effectively:

H Incorporate resilient green infrastructure into the public realm to support rain water management through sustainable drainage, reduce exposure to air pollution, manage heat and link London's greenspaces to overcome habitat fragmentation and benefit biodiversity.

User: Cross River Partnership

The overall Policy stated here is again welcome. However, there are two main challenges which are not given due recognition. First, the question of the funding of the specific policies is not covered substantively and it is not clear how the requisite funding can normally be obtained. Second, again there is a risk that this will lead to the Mayor becoming directly involved in the detail of essentially local planning and development decisions. It will be important to guard against this. The Policy should be amended to deal explicitly with both of these issues.

In addition, it would be beneficial to recognise explicitly in this section of Plan the role of Business Improvement Districts (BIDs) in managing and improving the public realm in their individual areas, working closely with their respective Boroughs. Strong partnerships, with good engagement from landowners, can make a tangible difference both in terms of funding public realm enhancements and positively shaping local planning and investment decisions.

There could be a case for formalising BIDs' influence over Borough economic development plans (e.g. incorporating their input into the review/sign-off process).

It would also be beneficial if the Policy was broadened to embrace a wider approach to local assets which includes Placemarks, not all of which will be heritage assets.

D7 Public Realm Page 123. Green Infrastructure in public realm and on carriageway; open street events; free drinking water are welcome innovations.

Camden Town Unlimited BID is leading a locally crowd-sourced campaign for a green route (the Camden Highline). This will effectively be privately financed but publicly accessible, so is a good example of an ‘independent initiative delivering a public good, like the proposal for a Camden Highline’.

Railways Arches – The Low Line

The geography of London is significantly affected by the railways which define significant routes, boundaries and barriers throughout the city. These include very significant stretches of railway arches that can provide an important economic opportunity as well as walkways and other routes to improve access and permeability.

The London Bridge Plan identifies the railway arches through the area as part of a “Low Line” which stretches across borough boundaries. The London Plan has an important role to play in realising the potential of railway arches because of the way in which they span in individual borough responsibilities. They can help meet the London Plan’s objectives for affordable workspace (Policy E2), improved public realm (Policy D7) and healthy streets (Policy T2). This multiple role is often overlooked.

User: Cross River Partnership

The River Thames

It would also be beneficial for the management of the River Thames and the Thames walkways, if their role in the public realm was acknowledged here. Although the statement in para 9.14.8 (p 367), that the River Thames should not be designated as Metropolitan Open Land, is welcome and this should remain the position, a statement here about the role of the River Thames would be appropriate.

The River Thames is the defining landscape, historic and natural feature of London. We believe it should feature more strongly in London Plan policies and that more emphasis is given to addressing routes along it and the positive economic, social and environmental contribution it makes. The London Plan has a particularly important role in providing a coherent approach given the Thames passes through so many boroughs.

We welcome that “use and enjoyment” of the Thames is identified as a strategic function of the Central Activities Zone and some protection afforded the Thames from tall buildings in Policy D8 and in strategic views (Policy HC3). Policy SI14 is especially welcome in encouraging the identification of Thames Policy Areas.

We recommend that Policy D7 is amended explicitly to recognise the importance of the public realm provided by and along the Thames, including specific reference to the need for expansive, continuous public access to the riverfront.

The River’s potential in terms of freight movements should also be recognised and supported at appropriate points in this draft London Plan.

User:	Public Health England

? Policy D7M states: ‘Ensure the provision and future management of free drinking water at appropriate locations in new or redeveloped public realm’. Encouraging people to drink more water in London is in line with government ambitions to reduce childhood obesity and PHE supports this policy. As part of this provision prioritisation of the most deprived areas of London for free drinking water sites would be also welcomed.

? Consumption of sugar sweetened drinks, compared to non-sugar sweetened drinks, results in greater weight gain and increases in body mass index in children and adolescents due to increased energy intake. Encouraging the consumption of drinking water is in line with the Healthy Schools London programmeix which encourages children to drink unsweetened drinks regularly throughout the day to reduce sugar intake.

User:	Oneill Homer
D7 Neighbourhood plans provide a means of measuring the relative value of the public realm to manage change.	

User:	L&Q

Street furniture

Part I of Policy D7 states that ‘Applications which seek to introduce unnecessary street furniture should normally be refused.’

This is a disproportionate detailed statement and should be removed.

User: Wimbledon East Hillside Residents' Association

Public Realm: It is disappointing so little intelligence is granted, to plan for good public spaces. In an age when homes are smaller and smaller, we need carefully curated public spaces that provide places to rest and compose oneself, to wait for a meeting or work to begin, to breath some fresh air, to be refreshed by a beautiful copse of trees or a spring bloom, or gosh, to hear birdsong.

The plan needs to encourage community ownership and wellbeing, linking the design, installation and plantings for each and every public space - from the very small, to the larger spaces. Companies are starting to use outreach, but there are still far too many cold, hostile so-called public spaces (More London?!) that contain more signs for what you cannot do, than for what you may enjoy/do there. This is not really a 'public space' is it?! It is a planning gesture, coldly executed and without a heart or soul.

User:	Kingston First

The public realm is a major feature of town centre environments and it is essential that they function properly. Poor design has a direct impact upon the economic performance of local commerce and it is therefore important that new development takes full of any opportunities presented Kingston First therefore support the wording of draft Policy 07.

User:	London Borough of Camden

Criterion K - This policy could be strengthened by stating that public realm should maximise opportunities to support social interaction (which may be different to social activities, for example where people could simply stop and chat for five minutes) and reduce social isolation, consistent with the Healthy Streets approach.

The approach would be strengthened by cross referencing policy S6 on access to public toilets.

User:	London Borough of Camden

Camden urges the Mayor to take into account that different groups may have different, and sometimes conflicting, uses of public space (for example, young people can see public spaces as places to simply "hang out", an activity often perceived as anti-social).

User:	Alex Page

I welcome the reference to urban greening in Policy D7 Public Realm. This should include a broader commitment to, and requirement for, conserving and restoring urban nature rather than the current common approach to installing trees in concrete or tubs and planting of low nature value.

User:	PCS Trade Union

3.7.11 PCS welcome the provision of free drinking water fountains to reduce use of plastic bottles. This however should be seen as part of returning these services to public ownership and management. Reference in 3.7.11 to “ongoing management and maintenance of facilities should be secured and agreed at planning stage” implies private or outsourced companies.

User: Battersea Project Land Company Limited

Paragraph 3.7.12 – Meanwhile uses

Whilst we support meanwhile uses, we do not consider that they are always appropriate or possible, and we would discourage a move towards seeking to impose tighter controls on them as this could have the opposite effect of the draft policy's intention. Part of their attraction is their ease and temporary nature, and there is a likelihood that landowners will be discouraged from doing them if requirements are then imposed on them in terms of their longevity and other 'obligations', as specified at paragraph 3.7.12. Meanwhile uses are only appropriate in limited situations. Often, particularly on constrained sites, land is required for logistics to deliver the permanent development, and the introduction of meanwhile uses could serve to disrupt or delay delivery.

RECOMMENDATION: Delete the requirement to establish parameters for meanwhile uses at the outset.

User:	Gideon Corby

I welcome the reference to urban greening in Policy D7 Public Realm. This should include a broader commitment to, and requirement for, conserving and restoring urban nature rather than the current common approach to installing trees in concrete or tubs and planting of low biodiversity value. Green space is often poor in biodiversity.

User:	Age UK London - a charity working with older Londoners

POLICY D7 PUBLIC REALM

The policy mentions provision of the public realm for people of all ages (see K), which is welcomed.

PROPOSED POLICY AMENDMENTS:

D7(I): TAKE OUT ‘where appropriate’ at the end of the first sentence, as this weakens the policy.

J Explore opportunities for innovative approaches, INVOLVING VIBRANT PLACEMAKING AND INSPIRATIONAL DESIGN, to improvE ing the public realm AND INCREASE SOCIAL INTERACTION, such as open street events.

NEW POLICY – RESIDENTIAL CONVERSIONS.

PROPOSED POLICY AMENDMENT:
To word a new policy that will promote residential conversions in accessible locations, which should be age and disabled friendly. The importance of conversions in providing ‘friendly’ housing should not be under-emphasised.

User: Age UK London - a charity working with older Londoners

26. D7 LINK TO POLICY CHANGE Add to F '…and a variety of uses' after surveillance to reinforce the purpose of the public realm. Remove 'where appropriate' from D7(I); this weakens the policy.

27. D7 H Strengthen H, perhaps by rewording to stress the importance of greening the public realm. This is because research has demonstrated the value of green space on mental well-being (Urban Mind: Using Smartphone technology Bio science 10.1.18: research between King's College London and landscape architects). In this study, J L Gibbon and Art foundation Nomad Projects used smart phone technology to assess the impact of nature in cities, and found that being outdoors, hearing bird song, seeing the sky and feeling in contact with nature were beneficial and particularly so to those individuals with greater impulsivity who were at risk of mental health issues. It has also been demonstrated that good access to public parks is a buffer against cognitive decline: Mobility Mood and Place (MMP) is a co- produced piece of research between architects, landscape architects, a neuro scientist and 750 older people into understanding the role of the urban environment on brain activity in older adults and is co-authored by Professor Catharine Ward Thompson of University of Edinburgh and director of OPENspace (http://www.openspace.eca.ac.uk). MMP builds on evidence that demonstrates how mood and the willingness to be active is influenced by how the environment is experienced.

28. D7 Expand/explore opportunities for innovative approaches in J, to give clearer direction by inserting the words, 'involving vibrant placemaking and inspirational design.' Include increasing social engagement in the policy so that, again, there can be no doubt about the purpose of the public realm to designers and developers. This is to maximise opportunities to improve the public realm and realise the vision of the New London Plan.

User:	Regeneration X

3.7.11 Talks about free water fountains, and elsewhere there is talk about public toilets in large commercial developments. This does not go far enough – there must be provision of public toilets in public places. London has never been richer and it is unacceptable not to provide and manage public toilets in public places. There is a greater need for public toilets than free water foundations.

User:	Regeneration X
3.7.12 We support the temporary use policy.	

User:	Karl Brown

3.7.9 The opening up of all public realm is supported. The desire should sensibly be extended to all publically owned open space where there is no compelling need to exclude access. A clear enforcement route would seem to be appropriate.

User:	Association of Directors of Public Health

Also in this section, ADPH London welcomes the provision of free drinking water fountains: this will contribute to reducing sugary beverage consumption.

User:	Notting Hill East Neighbourhood Forum

6. Public Realm

In addition to previous comments we would urge a more innovative approach to the use of existing streets for recreation for people of all ages, more opportunities for informal play, and social activities. Ensure that on street parking becomes a less and less dominant feature of the streetscape. Ensure the provision and management of free drinking water. Disallow if possible charging for streets closing for community events.

User:	Notting Hill East Neighbourhood Forum

3.7.1 Seems to imply that bright lighted streets are safer whereas research shows that lighting more sensitive to the needs of all users does not mean brighter lighting for safety's sake. We want to reduce light pollution.

User: London national Park City Foundation

Public realm - Policy D7, Page 122

LNPCF PROPOSAL: Policy D7 mentions urban greening but not particularly convincingly such that public realm will activity contribute to restoring urban nature rather than the current common approach to the installation of trees in concrete or tubs and planting of low nature value. Key sections of the current text are:

H Incorporate green infrastructure into the public realm to support rainwater management through sustainable drainage, reduce exposure to air pollution, manage heat and increase biodiversity.

I Ensure that shade and shelter are provided with appropriate types and amounts of seating to encourage people to spend time in a place, where appropriate. This should be done in conjunction with the removal of any unnecessary or dysfunctional clutter or street furniture to ensure the function of the space and pedestrian amenity is improved. Applications which seek to introduce unnecessary street furniture should normally be refused.

J Explore opportunities for innovative approaches to improving the public realm such as open street events.

K Create an engaging public realm for people of all ages, with opportunities for formal and informal play and social activities during the daytime, evening and at night. This should include identifying opportunities for the meanwhile use of sites in early phases of development to create temporary public realm.

L Ensure that on-street parking is designed so that it is not dominant or continuous, and that there is space for green infrastructure as well as cycle parking in the carriageway. Pedestrian crossings should be regular, convenient and accessible.

User:	London Beekeepers' Association

We support the proposal that green infrastructure should be incorporated into the public realm, see Policy D7 - Public realm

User: Mr Colin Bannon

Policy D7 and associated sections

It would be worth mentioning something about the design of shopfronts and how they interact with the public realm. How retail units can help activate space and contribute to place making – ref some good guidance and case studies.

3.7.1 Shared space is worth mentioning as there are lots of areas of London which have conflicts between pedestrians and vehicles, such as loading bays and refuse vehicles sharing public realm and sometimes private space. Loading and refuse vehicle collection should ideally be kept to the periphery of sites to encourage the maximum amount of quality public realm for people to enjoy.

3.7.9 In regards to maintenance, the use of robust materials such as granite in areas which have high or heavy vehicular use. Also soft landscaping should be dependent as little as possible, on manually watering. Therefore water retention systems should be included in schemes, from irrigation systems in public realm planters to water butts for recycled rainwater in private developments.

User:	Shared Assets

We strongly support the inclusion into policy of access to free drinking water, recognising its’ environmental and health benefits.

User: Kew Society

Policy D7 Public realm

There are welcome policies here such as access to public toilets and free drinking water but more flexibility should be given to local Boroughs on how to deliver these aims in a sustainable way.

The policy to prioritise 1 and 2 bedroom flats in town centres (and edge of town centres etc.), as above, militates against inclusivity.

User:	Carole Destre

I welcome the reference to urban greening in Policy D7 Public Realm. This should include a broader commitment to, and requirement for, conserving and restoring urban nature rather than the current common approach to installing trees in concrete or tubs and planting of low nature value. Trees in concrete tubs do not promote nature, are extremely expensive to maintain, do not allow children to play, do not let their leaves go back to compost, require watering. They are pretty useless.

User:	Carole Destre

I welcome the reference to urban greening in Policy D7 Public Realm. This should include a broader commitment to, and requirement for, conserving and restoring urban nature rather than the current common approach to installing trees in concrete or tubs and planting of low nature value. Trees in concrete tubs do not promote nature, are extremely expensive to maintain, do not allow children to play, do not let their leaves go back to compost, require watering. They are pretty useless.

User:	Juliet Hobday

I welcome the reference to urban greening in Policy D7 Public Realm. This should include a broader commitment to, and requirement for, conserving and restoring urban nature rather than the current common approach to installing trees in concrete or tubs and planting of low nature value.

Policy D8 Tall buildings

User:	Charlotte Gascoigne

Policy D8 weakens existing policies on tall buildings, which are completely inappropriate in historic conservation areas such as Hampstead or Mansfield conservation areas. Planning permission has recently been granted for a 24 storey tower at 100 Avenue Road. This development is completely out of keeping with our area, will loom over our conservation areas, create wind tunnels and canyon effects, and completely change the character of the streetscape. Since mid-rise development can deliver the same housing density as high-rise development, the London Plan should not be supporting tall buildings.

User: London Assembly Planning Committee

Recommendations The Mayor must adopt a much tougher stance on tall residential buildings and should, in revised Policy D8: • Establish a 'skyline commission' to advise on the design impact of tall buildings.

• Adopt more detailed and rigorous master planning process in relation to tall buildings, especially within Opportunity Areas.

• Draw up a London Plan policy that formalises the 'clusters' policy for tall buildings.

• Undertake a review of existing protected views, with the intention of adding new viewing corridors.Support the development of a 3D computer model of London's emerging skyline – and ensure this is made freely available to boroughs to ensure a consistent approach.

• Adopt a requirement for all developers with proposals for tall buildings to consider other building configurations — specifically that “alternative methods of achieving the same goals and densities should be demonstrated, shown and considered, as a prior condition” so that tall buildings are not immediately seen as the answer. Policy D8 should be further amended: Clause D8-C.1 Visual impacts. Add sub-clause at I, or ideally after D8 C2): Appropriate long term mechanisms must be established and demonstrated to ensure that tall buildings will be well-maintained and regularly upgraded for the duration of their design life as well as when they reach the end of their design life. Clause D8-C.3 Environmental impact. Add sub-clause: Buildings should not have a larger whole life carbon balance, per useable square metre, than a lower building would have. Clause D8-C.3 Environmental impact Note: The assessment of these and the minimum standards are not well defined. For example, requiring wind ‘assessments’ does not consider wind chill factors of as much as 6°C or local gusting. Clause D8-C.3 Environmental impact. Add sub-clause at c): Noise created by air...should not detract... for open spaces... and balconies and other amenity spaces

4.45 The Planning Committee, and Assembly, have consistently recommended that Mayoral planning policy is strengthened to restrict the location of London's tall buildings and improve their design. As such, we welcome the improvements in this area as set out in proposed Policy D8, for example those that require local definitions of what 'tall' means and the locations in each borough in which tall buildings would be acceptable. But the Assembly wishes to see the Mayor go further.
4.46 As New London Architecture has noted, in total, 455 tall buildings are currently in the pipeline with the potential to deliver an estimated 100,000 new homes, up from 436 in 2015.31
4.47 The committee notes the ongoing impact of these tall buildings on the skyline, that also affect London's heritage through the cumulative impact of inappropriate development. For example, UNESCO has issued warnings about the threat to Westminster's World Heritage status. Questions remain as to the sustainability of tall buildings, particularly in relation to their residential, as opposed to commercial, use.32 The first London Plan policy on tall buildings33 was never intended to apply to residential buildings and so the Mayor needs to take the opportunity of this full review of the Plan to ensure policy on tall buildings works for the community through much stronger guidance.
4.48 In its January 2016 report Up or Out: A false choice. Options for London's growth the Planning Committee highlighted that London is seeing an explosion of tall buildings. Tall residential buildings are not an answer to London's real housing needs and as such should not be encouraged outside of a few designated and carefully managed areas of London.
4.49 High densities can be achieved by approaches that are more suitable for families, more in keeping with London's traditional form and less intrusive on the skyline.x
4.50 The Assembly is therefore unanimous in call for the Mayor to get a tighter grip on the issue through tougher planning policy and better control of design approaches.34
4.51 An improved consultation process should be set up to provide residents, Londoners or statutory consultees the opportunity to block, or amend, inappropriate development applications. Tall buildings must face more thorough and meaningful assessments by independent commissions than smaller developments, particularly in relation to preserving the intrinsic character of historic London.
4.52 All proposals for tall buildings must be subject to independent peer Design Review Panels at several key stages of planning and design, including at pre-application stage, in order to evaluate the quality of proposals, and assess their strengths and weaknesses. Developers of tall buildings must prove to the Design Review Panels that they have previously considered alternative low or mid-rise massing configurations (alternative configurations) that do not have negative impacts on the skyline and streetscape, and that their buildings meet exemplary standards of architectural quality, materials and sustainability.
4.53 When considering building tall or large scale developments, the use of a 3D virtual reality (VR) model must become a compulsory tool used by applicants, boroughs and the Mayor's office to realistically assess the cumulative and individual impact of the development on the city in terms of views, environmental harm (including daylight and sunlight, shadowing, overlooking and to microclimate) and impact on amenities. Such a 3D VR tool must be made available by the Mayor to the boroughs.

Policy D9 Basement development

User:	London Borough of Bromley

To date the Council is not aware of negative issues resulting from so called “mega basement” development in the Borough, however it supports the spirit of the policy in protecting people and property and will review the need for local restrictions in the future.

User: London Councils

It is welcome that the London Plan recognises that basement development is an issue and particularly relevant in inner boroughs with high land values. Boroughs are already taking their own approaches to basement developments and establishing policies and guidance to mitigate negative impacts.

Where appropriate, boroughs are also issuing Article 4 directions to prevent Permitted Development Rights enabling basement development. London Councils supports the GLA's position that boroughs should have the ability to restrict large scale basement development where this type of development is likely to cause unacceptable harm and can support them in applying to the Secretary of State for Article 4 directions.

User:	London Borough of Tower Hamlets

We are broadly supportive of this policy. We do not face large numbers of applications for large basements (i.e. those that are multi storied or extend beyond the building envelope) but we are seeing increasing numbers in small domestic properties in heritage settings.

User:	Royal Borough of Kingston
Support.	

User:	London Borough of Waltham Forest

We have no objection in principle to this policy, noting that this type of development is not typical in Waltham Forest. As such, for reasons relating to local context, it is unlikely that planning permission would be granted for this type of development, other than in very exceptional circumstances.

User:	London Borough of Hillingdon

This policy is not a strategic issue, nor is it prescriptive enough to be of any value to local authorities. There is no definition of negative impacts and the supporting text introduces several grey areas which local authorities would have to navigate. This is not an issue that is refined to inner London or large scale basement development. The policy should be deleted and the issue of basement development left to individual Boroughs to address.

User:	Westminster City Council

We welcome this policy’s support for boroughs to address the negative impacts of large scale basement developments, through the development of their own policies.

User:	Lesley Halliday

I support the inclusion of “Protection for trees” as an issue in the amplification of potential negative impacts of large-scale basement development beneath existing buildings.

User:	London Borough of Enfield

Policy D9 looks at basement development. The issue with this policy is that it needs to focus on issues more specifically related to basement developments rather than issues that would be assessed as part of any development.

User:	London Borough of Wandsworth

The Council considers Policy D9 to be unhelpful. The text following the Policy details problems that the construction of basements can cause in high density residential environments but the Policy does not contain any wording in recognition of the problem or how to deal with issues which arise.

User:	London Borough of Richmond Upon Thames

The London Plan just requires LPAs to have a policy to address the negative impacts of largescale
basement development beneath existing buildings. This we have, along with an Article 4 Direction to remove the permitted development rights for subterranean developments in flood hazard areas and across the whole borough. It means that once it comes into force on 1 April 2018, planning permission will be required for basement and subterranean developments. The text following the London Plan Policy D9 details problems that the construction of basements can cause in high density residential environments but the Policy does not contain any wording in recognition of the problem or how to deal with issues that arise.

User: London Borough of Harrow

The Council support this policy. However, Harrow considers that the policy could be amended to indicate that boroughs should ensure that their Local Plan policies address basement development rather than specifying they must have a policy specifically relating to basements.

The paragraph 3.9.5 mentions structural stability which is not a planning matter.

The term Construction Method and Management Plans in para 3.9.4 to be amended to Construction Logistics Implementation Plan. Consistency in terminology used across boroughs and TfL will ensure these plans are able to be consistently scrutinised in accordance with industry best practice and TfL best practice.

User: London Borough of Harrow

The Council support this policy. However, Harrow considers that the policy could be amended to indicate that boroughs should ensure that their Local Plan policies address basement development rather than specifying they must have a policy specifically relating to basements.

The paragraph 3.9.5 mentions structural stability which is not a planning matter.

The term Construction Method and Management Plans in para 3.9.4 to be amended to Construction Logistics Implementation Plan. Consistency in terminology used across boroughs and TfL will ensure these plans are able to be consistently scrutinised in accordance with industry best practice and TfL best practice.

User:	Sheila Cave

I support the inclusion of “Protection for trees” as an issue in the amplification of potential negative impacts of large?scale basement development beneath existing buildings.

User:	Rosemary Rakestrow

I support the inclusion of “Protection for trees” as an issue in the amplification of potential negative impacts of large-scale basement development beneath existing buildings.

User:	Kathryn Morton

I support the inclusion of “Protection for trees” as an issue in the amplification of potential negative impacts of large-scale basement development beneath existing buildings.

User:	The Wimbledon Society
D9: Basement Policy should generally preclude them under Listed and Locally Listed buildings, and under terraced/semi-detached properties because of the effects on neighbouring structures; and under housing on flood plains	

User:	London Borough of Newham
LBN agree this is potentially a useful policy, though basement development is not presently a common form of development in Newham.	

User:	Nicki Lang

I support the inclusion of “Protection for trees” as an issue in the amplification of potential negative impacts of large-scale basement development beneath existing buildings.

User:	Fiona Macdonald

I support the inclusion of “Protection for trees” as an issue in the amplification of potential negative impacts of large-scale basement development beneath existing buildings.

User:	Jill Henderson

Paragraph 3.9.5. I support the inclusion of “Protection for trees” as an issue in the amplification of potential negative impacts of large-scale basement development beneath existing buildings.

User: Just Space

D9 Basement development

Boroughs should develop policies…

No comment

User:	The Woodland Trust

Support the inclusion of “Protection for trees” as an issue in the amplification of potential negative impacts of large-scale basement development beneath existing buildings.

User:	Association of Local Government Archaeological Officers (ALGAO)
Welcome reference in supporting text to harm to archaeology in relation to basement development	

User:	Kingston and Surbiton Constituency Labour Party

D9 and 11 we welcome policies on basement development and fire safety.

User:	Mr Jon Halse

Paragraph 3.9.5. I support the inclusion of “Protection for trees” as an issue in the amplification of potential negative impacts of large-scale basement development beneath existing buildings.

User:	Chartered Institute of Architectural Technologists

Policies D7, D8, D9, D10, D12 & D13

We are in agreement with the proposals contained in the plan.

User: Mr Terry Wilden

Comment

We generally support this policy**, but why does it only apply to existing buildings?**

Suggested Amendment

Policy D9

“A. Boroughs, particularly in inner London, should establish policies to address the negative impacts of large-scale basement development beneath ***both new and*** existing buildings.”

Reason

The negative impacts of basement development in new buildings should also be assessed in terms of impacts on the ground conditions, water table, sustainability (embedded carbon etc.).

User:	London Wildlife Trust

We welcome and support this policy; evidence suggests it has contributed to the loss of garden greenspace and trees in various parts of inner London. In para 3.9.5 we support the inclusion of “Protection for trees” as an issue in the amplification of potential negative impacts of large-scale basement development beneath existing buildings.

User:	S Place

Little thought has been given to the building of basements. The geological conditions of any area must play a large part in detennining whether or not it is suitable to excavate such a large area. Again one size fits all is not good planning. This whole subject needs a much closer investigation. Preferably it should be left to each local council to decide what is possible within their boundaries.

User:	Frances High

- Paragraph 3.9.5. I support the inclusion of “Protection for trees” as an issue in the amplification of potential negative impacts of large-scale basement development beneath existing buildings.

User:	Mr Andrew Garrod

Paragraph 3.9.5. I support the inclusion of “Protection for trees” as an issue in the amplification of potential negative impacts of large-scale basement development beneath existing buildings.

User:	Historic England
We welcome reference to archaeology and heritage in relation to basement developments.	

User: University College London

Policy D9 Basement Development

UCL recognises the DNLP's intention to restrict large-scale basement developments beneath existing buildings. However, UCL considers a need for Policy D9 to reflect that on occasion, large basements are vital to support some specific uses in central London. In the case of UCL, large basements are necessary for certain academic and research uses and to counter the impact of above ground heritage policies or strategic viewing corridors, which most of UCL's Bloomsbury estate is impacted by, thus restricting the height of new development. An example would be UCL's New Student Centre building which is currently under construction on Gordon Street and which will deliver two basement floors.

UCL therefore consider the need for Policy D9 to list possible exceptions where basements may be permitted.

These should include the following:

- *new major developments, for example schemes which comprise 1000 sqm additional non-residential floorspace or 10 or more additional dwellings;*
- *large schemes located in a commercial setting; or*
- *developments the size of an entire or substantial part of an urban block.*

It is highly likely that UCL's future projects that involve basements will meet the exception criteria above.

User:	Patrick Mossop

Paragraph 3.9.5. I support the inclusion of “Protection for trees” as an issue in the amplification of potential negative impacts of large-scale basement development beneath existing buildings.

User: Blackheath Society

Policy D9 Basement developments: We welcome the discussion of basements which have become a major, and problematic, issue in many London boroughs. The policy proposed does not go far enough however. Boroughs should be required to develop policies in respect of all basement developments, not merely large scale significant ones. Even relatively modest basement developments beneath single dwellings can have serious implications for existing structures and neighbours' amenity particularly on sloping sites, where the ground contains clay or where there are groundwater complications. Boroughs should have policies to address these matters. Where one or more of these circumstances apply, basement developments should be permitted only if a basement impact assessment concludes that there is no likelihood of unacceptable structural damage to the host or neighbouring buildings.

User:	London Borough of Ealing

It seems unproductive to write a policy simply to direct LPAs to address the negative impacts of basement development. This policy should be redrafted to identify the potential negatives and minimise the number of generic DM policies in London. It will still be open to boroughs to prohibit this form of development if it proves problematic in particular areas.

User: Highgate Society

D9(A) Support and object

The policy on basement development focuses on large scale basement development (defined as multi-storey and /or those that extend significantly beyond the existing footprint of the building) rather than small scale basement development (not defined but presumably single storey and within existing footprint of a smaller building). Small scale basement development is what affects most adjoining property owners in London. It has caused major problems in Highgate, an area of complex geology and hydrography, and in an extreme case an adjoining house experienced major subsidence.

This policy offers no further protection for small scale basement development whilst saying that these developments will be covered by the planning process but only within a Conservation Area or if an Article 4 direction has been made. Additionally it does not address the different types of housing stock in London from Victorian terraces and large stand alone mansions.

Whilst the Society welcomes that basements in a Conservation Area/Article 4 Directive as exempt from PD rights, our experience, and that of communities across London, makes it clear that this exemption must apply to all basements.

The Policy refers particularly to Inner London. However, experience make it abundantly clear that the impact of basements developments on neighbours is equally severe in all Boroughs. Differentiating on such an issue merely on grounds of whether it is in inner or outer London is illogical and there must be no differentiation.

This policy could therefore be read as giving the go-ahead to small scale basement development in London.. As detailed above, this is completely unjustifiable. Basement development is not only a predominantly inner London problem, but a London-wide problem. The policy as currently proposed will not address, but will exacerbate, the situation. This would not be a good outcome

User:	Hornsey & Wood Green Labour Party

There should be a presumption against basement development.The policy supports smaller-scale basement excavations, where appropriately designed but restricting large-scale basement excavations. We would propose there should be much greater scrutiny.

User: Cllr Richard Chatterjee

Policy D9 Basement development

D9 Boroughs, particularly in inner London, should establish policies to address the negative impacts of large-scale basement development beneath existing buildings.

Comment:

Any basement developments with Kitchen, bathroom or WCs below the local services infrastructure level will require pumping and reverse flow prevention valves to connect to the local services infrastructure. These are subject to maintenance or replacement requirements and should be accessible within the proposed development from manholes and should be

easily accessible.

Recommendation:

Any developments which require services below the level of supply or discharge should be avoided if possible. Any proposed development which includes below surface drainage and sewer discharge which requires pumps and reverse flow valve prevention should ensure that

access manholes are provided to ensure access for maintenance and replacement of pump and valve equipment.

User:	Romford Civic Society

Paragraph 3.9.5. I support the inclusion of “Protection for trees” as an issue in the amplification of potential negative impacts of large-scale basement development beneath existing buildings.

User: Ealing Fields Residents Association

CONVERSIONS AND BASEMENT ACCOMMODATION

We have been concerned to note an emerging local trend for the excavation and construction of self-contained basement accommodation beneath local modest sized Edwardian terraced homes.

These new basements are wholly below ground level. They are not partially above and partially below ground level, as is common with Victorian properties.

We are concerned about the undesirable quality of the living accommodation of these wholly ‘submerged’ new basements. Especially if there is any chance that the accommodation might be occupied by families with young children.

We therefore suggest that the draft basements policy should be amplified to require that any new basement which is wholly below ground level should only be permitted where it is an adjunct of, and integral to, ground floor accommodation. It other words, any wholly ‘submerged’ basement must be an integral part of the ground floor unit.

User:	Socialist Health Association London

Policy D9 Basement development

We refer to Karen Buck MP’s work on what can be a public nuisance in terms of air quality, noise pollution, mental health and general nuisance to neighbours – as well as potential damage to surrounding structures.

User:	Mrs P Matthews

I support the inclusion of “protection for trees” as an issue in the amplification of potential negative impacts of large-scale basement developments beneath existing buildings.

User:	London Borough of Camden

The purpose of this brief policy is unclear. Boroughs where basements are an issue have already introduced, or are planning to introduce, policies to address this.

If the policy is retained the reference to "large-scale" basement development should be deleted - policies should address the potential negative impacts of all basements, regardless of their size. Small basements, if not properly designed and constructed, also have negative impacts.

User:	David Callow

Paragraph 3.9.5. I support the inclusion of “Protection for trees” as an issue in the amplification of potential negative impacts of large-scale basement development beneath existing buildings.

User:	David Tannahill

- Paragraph 3.9.5. I support the inclusion of “Protection for trees” as an issue in the amplification of potential negative impacts of large-scale basement development beneath existing buildings.

User:	Elisabeth Rolls

Paragraph 3.9.5. I support the inclusion of “Protection for trees” as an issue in the amplification of potential negative impacts of large-scale basement development beneath existing buildings.

User:	Adrian Malcolm Darley

Paragraph 3.9.5. I support the inclusion of “Protection for trees” as an issue in the amplification of potential negative impacts of large-scale basement development beneath existing buildings.

User:	Agnes Byrne

Paragraph 3.9.5. I support the inclusion of “Protection for trees” as an issue in the amplification of potential negative impacts of large-scale basement development beneath existing buildings.

User:	Alan Jacobs

Paragraph 3.9.5. I support the inclusion of “Protection for trees” as an issue in the amplification of potential negative impacts of large-scale basement development beneath existing buildings.

User:	Alan James North

Paragraph 3.9.5. I support the inclusion of “Protection for trees” as an issue in the amplification of potential negative impacts of large-scale basement development beneath existing buildings.

User:	Fenella Barton

I support the inclusion of “Protection for trees” as an issue in the amplification of potential negative impacts of large-scale basement development beneath existing buildings.

User:	Joan Anne Hepworth

In paragraph 3.9.5 "Protection of Trees" should be an issue in the amplification of potential negative impacts of large-scale basement development beneath existing buildings.

User:	William Lucy
Paragraph 3.9.5 **Support** the inclusion of “Protection for trees” as an issue in the amplification of potential negative impacts of large-scale basement development beneath existing buildings.	

User: Keith Saunders

The importànce of trees and woodlands cannot be emphasised enough. They improve air quality, provide vital habitat for wildlife, much of which is disappearing from urban areas and aesthetically they help to brea? up views of endless buildings. Also, people feel better and more relaxed in wooded areas. I work as a conservation volunteer and any time spent in woodland makes me feel better in myself.

In the sections listed below (in the same order as they appear in the draft London Plan).

- Paragraph 1.3.3. Recommend an addition (in CAPS) to the following sentence: “Access to green and open spaces, including waterways AND TREES, can improve health, but access varies widely across the city.”
- Paragraph 3.9.5. I support the inclusion of “Protection for trees” as an issue in the amplification of potential negative impacts of large-scale basement development beneath existing buildings.
- Policy H1. Increasing housing supply. I recommend that Sentence B2)d is clarified so that “public sector owned sites” will not include woodland, parks and open spaces.
- Paragraph 4.2.9. I support the principle of “no net loss of overall green cover” as a result of small housing developments, and support “off-site provision such as new street trees” in order to achieve this principle. I recommend an addition (in CAPS) to the following sentence: "Loss of existing biodiversity OR GREEN SPACE, as a result of small housing developments, should be mitigated through measures such as the installation of green roofs, the provision of landscaping that facilitates sustainable urban drainage, or off-site provision such as new street trees in order to achieve the principle of no net loss of overall green cover. Rainwater attenuation features should be incorporated to achieve greenfield run off rates. LOSS OF ANY PUBLIC GREEN SPACE WILL BE COMPENSATED FOR WITH ALTERNATIVE ACCESSIBLE SITES.”
- Policy S4. Play and informal recreation. I support section B2)d, that residential development proposals for schemes that are likely to be used by children and young people should incorporate good-quality, accessible play provision for all ages, of at least 10 square metres per child that: “incorporates trees and/or other forms of greenery”.
- Policy G1. Green infrastructure. I support this policy, and subsequent narrative that mentions the important role of trees.
- Policy G5. Urban greening. I support this policy, including the recommended Urban Green Space Factor, and subsequent narrative that mentions the important role of trees. I support the inclusion of the role and weighting for woodland and trees in Table 8.2 - Urban Greening Factors. I recommend including a reference to Residential Development and Trees (Woodland Trust, 2015, woodlandtrust.org.uk/residentialdevelopments).
- Policy G6. Biodiversity and access to nature. I support this policy. I recommend that Sites of Metropolitan Importance and all ancient woodlands are added to the categories of planning applications that must be referred to the Mayor.
- Policy G7. Trees and woodlands. I support this policy. I recommend that Section B)1 is strengthened as follows (amendments in CAPS): “GIVE THE STRONGEST POSSIBLE protectION TO ‘veteran’ trees and ancient woodland, ESPECIALLY where these are not already part of a protected site”. I support the subsequent narrative on the role of trees, particularly paragraphs 8.71 – 8.73. I recommend referring London boroughs to guidance on ancient woodland and veteran trees: Planners’ manual for ancient woodland and veteran trees(Woodland Trust, 2017, woodlandtrust.org.uk/plannersmanual).

Please accept this my formal response to the consultation. I will look forward to hearing from you as the Plan progresss.

User: Kew Society

Policy D9 Basement development

It would be helpful if the London Plan were to say something to support the best of the new restrictions on basement development now incorporated in several Borough policies, including Richmond's, as a result of widespread and legitimate public concern. This includes both building risks and changes to the nature of the housing mix in localities.

Policy D10 Safety, security and resilience to emergency

User:	Mr Peter Eversden MBE

Paragraph 3.10.2 should have the words 'in both design and management.' replaced by 'in design, materials used and management.'

User: Police Crime Prevention Initiatives Limited

Policy D10 Safety, security and resilience to emergency

“The Mayor uses his convening power to work with relevant partners and stakeholders to ensure and maintain a safe and secure environment in London that is resilient against emergencies including fire, flood, weather, terrorism and related hazards as set out in the London Risk Register.

A Boroughs should work with their local Metropolitan Police Service ‘Design Out Crime’ officers and planning teams, whilst also working with other agencies such as the London Fire and Emergency Planning Authority, the City of London Police and the British Transport Police to identify the community safety needs, policies and sites required for their area and to support provision of necessary infrastructure to maintain a safe and secure environment.”

Having regard for the primary response above, Secured by Design recommend that if retained, the proposed draft Policy D10.A, includes reference to the provision of resilient buildings and infrastructure. This is to maintain a safe and secure environment but also to reduce the fear or perception of crime.

B “Development proposals should maximise building resilience and minimise potential physical risks, including those arising as a result of fire, flood and related hazards. Development should include measures to design out crime that – in proportion to the risk – deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area.”

Having regard for the primary response above, Secured by Design recommend that if retained, the proposed draft Policy D10.B, includes reference to minimising physical risks from criminal activity.

In addition, there should be a clear expectation that development “always seek to include” design out crime measures that deter, detect and mitigate terrorist activity and its effects whilst remaining proportionate to the threat.

Early consideration is essential to ensure they create a coherent, interlinked security regime that is (where required), aesthetically integrated into the development and the wider environment.

3.10.3 “Measures to design out crime, including counter terrorism measures, should be integral to development proposals and considered early in the design process. This will ensure they provide adequate protection, do not compromise good design, do not shift vulnerabilities elsewhere, and are cost-effective. Development proposals should incorporate measures that are proportionate to the threat of the risk of an attack and the likely consequences of one.”

Having regard for the primary response above, Secured by Design recommend that if retained, draft paragraph D10: 3.10.3) be expanded to include specific reference to ‘implementation of measures to ‘design out crime and ASB’ according to the ‘Police-CPI - Secured by Design scheme’.

Early consultation with DOCOs will reduce potential for cost effectiveness shifting vulnerabilities or compromising good design.

In order to be effective, the measures incorporated into the development proposals must be proportionate to the assessed threat or potential risk of an attack and the likely consequences of one.

SBD guidance and development awards, actively supports and compliments NACTSO “Crowded Place” guidance. DOCOs are the first point of contact, and if appropriate they refer consultees for specialist Counter Terrorist Security Advice.

3.10.4 “New development, including streetscapes and public spaces, should incorporate elements that deter terrorists, maximise the probability of detecting intrusion, and delay any attempts at disruption until a response can be activated. Consideration should be given to physical, personnel and electronic security (including detailed questions of design and choice of materials, vehicular stand off and access, air intakes and telecommunications infrastructure). The Metropolitan Police (Designing Out Crime Officers and Counter Terrorism Security Advisors) should be consulted to ensure major developments contain appropriate design solutions, which respond to the potential level of risk whilst ensuring the quality of places is maximised.”

Having regard for our response above, Secured by Design recommend that if retained, draft paragraph D10: 3.10.4) places a specific expectation that the Metropolitan Police (Design Out Crime Officers and Counter Terrorism Security Advisors) will be consulted at an early stage, to enable the provision of protective security environments by drawing on current designing out crime and counter terrorism security principles.

When required, major developments are expected to contain design solutions, that are appropriate and able to mitigate the potential level of risk, whilst ensuring that good quality urban and environmental design principles are maintained.

The measures designed in should deter terrorists, maximise the probability of their detection, and delay or disrupt their activity until an appropriate response can be deployed.

User:	Levitt Bernstein
Technical issues should not be included in planning policy.	

User:	London Forum of Amenity and Civic Societies

Paragraph 3.10.2 should have the words "in both design and management." replaced by 'in design, materials used and management.'

Vulnerable uses, e.g. housing, should not be built in flood zones 3A and 3B.

User: Mr Simon Hunt

With this rush to intensify the population density can we put to bed the bizarre notion of closing more police stations?

We'll need more police presence, right, with these new ghettos?

User:	Centre for Accessible Environments

This should specifically refer to adopting an inclusive design approach and that measures should, where at all possible, not compromise access, with liaison between relevant stakeholders throughout whole of design and development/management process.

User:	Love Wimbledon BID
Designing out crime should be a mandatory requirement of all planning applications	

User: London Assembly Green Party Group

In my response to A City for All Londoners I expressed concern at the primacy given to police recommendations when assessing the security of developments and public spaces, as they may clash with other goals of the Mayor.

"Some of the design recommendations promoted by police can lead to solutions that don't maximise the utility of public realm for pedestrians and people on bikes, such as the removal of places to sit and community severance when 'escape routes' for criminals are closed off.

"We recommend that the Healthy Streets and Lifetime Neighbourhoods principles are prioritised within the new London Plan as the best way to maximise the utility and feeling of safety in the design of public spaces and streets.**" Towards a new London Plan**

I am therefore disappointed to see that policy D10 A again defers to the police and only design out crime principles. This potentially clashes with some equalities and Healthy Streets principles, and carries a risk that different standards may be applied to different communities in London.

I believe the solution now may not be to ask again for the policy to be changed, since the Mayor has rejected my proposals.

Instead, I propose that the Mayor brings together TfL and campaigners for accessibility, equality and active travel with the police to review, update and improve police guidance to better fit in with these other Mayoral priorities.

User: Butler & Young Approved Inspectors Limited

Policy D10B makes reference to building resilsience to risks arising from fire (as one aspect of risk). Fire safety of buildings is controlled under other legislation in relation to life risk by the Building Regulations, the Regulatory Reform (Fire Safety) Order, health and safety at work legislation and HMO legislation.

Property protection issues may want to be considered but are usually a consideration for building owners and their insurers.

Any conditions proposed by the planning authority in relation to fire safety aspects for life safety under this policy would surely fail the 6 tests under the NPPF as 1- Not necessary as controlled under building regulations, regulatory reform (fire safety) order, health and safety at work legislation or HMO legislation, 2 - not relevant to planning as controlled under building regulations, regulatory reform (fire safety) order, health and safety at work legislation or HMO legislation 4- not enforceable as controlled under building regulations, regulatory reform (fire safety) order, health and safety at work legislation or HMO legislation and therefore 6- not reasonable

User: Butler & Young Approved Inspectors Limited

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User:	London Ambulance Service

We work closely with emergency services and others across London to test our resilience. We have obviously been tested over the past year on our response to major incidents and have worked effectively with our colleagues. We have clear systems and plans in place, including the use of a specialist operations centre, which is equipped to manage significant and major incidents. Managing the incident within the specialist operations centre enables us to minimise the impact on the rest of London.

We’re fully engaged with The London Emergency Services Liaison Panel (LESLP), which brings together representatives from services across London to provide a framework for working together as effectively as possible in a major incident.

We have specialist teams trained to respond in the event of a major incident. These teams are trained in giving medical care in hazardous areas, such as at height, in water, in confined spaces or where there may be hazardous materials. We also have staff trained in responding to chemical, biological, radiological or nuclear attacks and staff trained to respond in hostile environments, such as fire arms incidents.

User: Hilson Moran

Hilson Moran endorses policy aimed at ensuring and maintaining a safe and secure environment in London and have the following additional suggestions with respect to Policy D10:

- Para A: Boroughs may also need to consult Specialist Government Agencies / Sectors (e.g. CPNI, CAST) where sensitive, high risk and/or CNI related design is required;
- Para B: Development proposals should maximise building resilience and minimise all potential risks (not just physical).

Hilson Moran is concerned that Design Out Crime Officers and Counter-Terrorism Security Officers are few in number and there is a reliance on Security Design Consultants to deliver solutions and recommendations. There also needs to be a holistic risk management approach to design (for example, in line with the BRE SABRE methodology) to allow reasonable and appropriate recommendations for security measures rather than relying on generalist and inflexible solutions often proposed as part of 'Secured by Design.'

User:	Hilson Moran

Hilson Moran proposes that measures to design out crime also consider sustainable solutions and that development proposals should follow a holistic risk-management design framework and incorporate commensurate measures that are proportionate to the risk of a threat or criminal event, and reduce the impact of any likely consequences.

User:	Twinn Sustainability Innovation

Policy D10-C. Add: Developments dependant on sealed façades and on air-conditioning shall submit an assessment of how long they will be able to operate and maintain acceptable and safe conditions for occupancy during an electrical power failure.

Note: This builds on the New York post-Sandy experience and as an example see LEED assessment method BD+C New Construction v3 2009 Passive Survivability and Functionality During Emergencies

User: Association of Licensed Multiple Retailers

London's licensed venues have played active and positive roles in helping to cope with tragedies such as the Westminster Bridge attack, when pubs and restaurants acted as places of shelter and safety. The hospitality trade more widely is deeply responsible in its approach to safeguarding harm to its customers, liaising regularly with NaCTSO and other anti-terrorist and emergency services groups.

Customer safety is paramount and the sector invests huge sums to deliver safe and supervised environments. This comes at quite a cost and is best devised and implemented in receipt of the expertise and knowledge of operators themselves, so UKHospitality would urge any development of policy in this area to be done in close partnership with us and our members.

User:	Ms Torla Evans

Please encourage councils to publish their fire risk assessments and also we need to look again at our fire and building safety standards. Councils, listen to your residents when thy voice safety concerns. Ask councils to listen and take action when residents are voicing their concerns.

User:	Ms Torla Evans

Lighting in dark areas would go some way to deterring crime.Introducing good green planting to soften and improve an area is a step in the right direction.

User: EngineersHRW

Policy D10 Safety, security and resilience to emergency

Clause D10-C. Add: **Developments dependant on sealed façades and also airconditioning shall submit an assessment of how long they will be able to operate and maintain acceptable and safe conditions for occupancy during an electrical power failure.**

Note: This builds on the New York experience and as an example see LEED assessment method BD+C New Construction v3 2009 Passive Survivability and Functionality During Emergencies

User: London Borough of Islington

Chapter

Design

Draft London Plan Policy

Policy D10 – Safety, Security and resilience to emergency

Islington Response

Our concern here is that, taken in isolation, secure by design measures can compromise the accessibility and sustainability of a proposal; all these design principles should be integrated.

User:	City of London Corporation
Guidance on safety, security and resilience is welcomed, as is the specific reference to the need to liaise with the City of London Police.	

User:	City of London Corporation

Paragraph B requires that security measures be integrated into the development and the wider area. The City Corporation considers that the emphasis should be on delivering building-related security measures within the building itself, but that developers should also contribute to the design and delivery of area-wide security measures and on-street hostile vehicle mitigation, where appropriate and identified within Local Plans.

User:	London Borough of Barnet

Following the Grenfell Tower disaster and terrorism attacks in London in recent years the changes made reflected through this suite of DLP policies are understandable and generally supported. Public realm design needs to take account of / be resilient to terrorism. The Council and Barnet Homes take fire safety extremely seriously; there are already extensive measures in place to ensure that our homes comply with fire safety regulations. All our high-rise blocks have fully up to date Fire Risk Assessments in place. A further review of fire safety measures in our high-rise blocks was carried out to identify any measures that are required to move beyond legislative compliance to deliver best practice in fire safety including the consideration of sprinkler systems, improved fire and smoke alarm systems and other measures. We would however question whether requiring a Fire Statement for major development is potentially straying into non-planning matters. Undertaking robust assessment of such statements could prove challenging for many boroughs. The London Plan will need to reflect the conclusions and Government response to the Independent Review of Building Regulations and Fire Safety expected from Spring 2018.

User:	London Fire and Emergency Planning Authority

Supporting London’s culture and creative industries

21. Under Policy HC5 Supporting London’s culture and creative industries, the draft London Plan encourage the temporary use of vacant buildings and sites for cultural and creative activities. This is something LFEPA supports and is currently seeing the benefits of at The Workshop, at the 8 Albert Embankment site in Lambeth. The pop up museum there has seen circa 20,000 visitors in 2017 alone, all of whom have had the opportunity to explore the history of the fire brigade in London, learn about fire safety and improve their own safety in the home. A permanent museum is planned for the site within the lifetime of the London Plan. As well as being a cultural offering this would also support the aspirations set out in D10 and D11 of the London Plan through public education programmes contributing towards maintaining a safe and secure environment in London, including delivering fire safety information.

User:	Newham Union of Tenants

D10 Safety and security and resilience to emergency

Designing out crime should be mentioned in the policy (as well as in supporting text).

User:	London Tenants Federation

3.10.1 Policy D10 Safety and security and resilience to emergency

Designing out crime should be mentioned in the policy (as well as in supporting text).

3.10.2 This policy would be enhanced by the maintenance of existing or provision of new community centres with budgetary allocations from CIL.

User: Better Bankside Business Improvement District

Better Bankside support variety in the retail sector, particularly given that Bankside's retail offering can be improved. However, there is concern that the lack of police officers on the street has led to businesses losing confidence in the level of support from police, which had led to crimes not being reported. This lack of confidence coupled with a reticence to work with officers - and refusal from businesses to take the necessary precautions in terms of security provision and staff training - means that retail crime largely goes unopposed.

The London Plan should ensure that it not only encourages diversity but should also make recommendations for the level of security personnel required for retailers and the level of staff training required in order to design out crime. Designing out crime advice/guidelines should not only be reserved for large developments, but also for smaller retail units to provide guidance on how store layouts can minimise retail theft for example.

Having seen the effects of the London Bridge/Borough Market attack first hand, we would advise that all markets in London should be target hardened to prevent against terrorist attacks. Heavy Vehicle Mitigation (HVM) should be required as standard, and local and central government should make financial support available to assist in the installation of this. Markets should be required to have experienced security teams on hand during operating hours. These teams need to be well trained and highly motivated. Having well trained and highly motivated staff will not only dissuade would-be terrorist attackers, but would also have an impact on the other types of crime that plague crowded markets, such as pickpocketing.

Better Bankside support better management of retails clusters. Thought needs to be given to the types of businesses in any high street and no one service should be favoured if possible. For example, having a proliferation of betting shops, pawn shops, payday loan lenders in one area will draw a particular type of user to that area. This will normally have a knock-on effect on the crime in the area with rates of shoplifting, robbery, burglary, and drug use increasing. Again, this is where variety in the offering in an area is important.

Areas will also need suitable support to manage public spaces and support the community. Street cleaning, refuse collection and crime prevention all need to be factored into this plan as all areas are interlinked. The Police, Local Authorities and business community all need to work together to ensure that their retail centres are clean, inviting and safe.

Historically Bankside was London's entertainment quarter for activities which would not have been officially permitted within the City, and today it remains a hub of entertainment - home to some of the world's most renowned cultural institutions, Tate Modern, Shakespeare's Globe and Borough Market. On average, over 2.5 million people are recorded each month via Better Bankside's footfall cameras. The area has almost 2000 hotel rooms. In response to point 6.10.2 and meeting the accommodation demands of tourists, Better Bankside in turn need to ensure infrastructure in an area supports the overnight visitors. If a 24-hour city is to be achieved in London, there needs to be consideration of noise implications to residents, street cleaning teams, confidence in the streets late at night and appropriate policing, as well as an effective late-night transport system.

Furthermore, a successful and well managed night-time economy lies at the heart of the strategy to achieve this end result. Devising and delivering those management arrangements is what Better

Bankside and other BIDs around the city are engaged in. They bring resource, innovation and an appetite for collaboration with other stakeholders. One example of this is the employment of Section 92 Officers.

Better Bankside has deployed a 7 day a week warden service in partnership with Southwark Council for the past 14 years. An analysis of the timing and nature of crime statistics indicated that a significant part of the problem impacted outside the hours that the wardens are active (08:00 – 20:00). And it was on order to address these night time hours that was one of the motivations for our investment in Section 92 officers.

User:	London Borough of Haringey
This policy is supported.	

User:	Environment Agency

We support the policy, and recommend amendments to highlight the roles of the London Resilience Forum, and the Environment Agency.

Recommendation:

D10:
? Please refer to the London Resilience Forum, and flooding as a hazard
? Please refer to the Environment Agency as one of the bodies who boroughs should work with.

User:	Environment Agency

We welcome the policy message that new developments should be constructed with resilience at their heart. However, designing out flood risk is currently underplayed in comparison to fire safety.

Recommendation:#

Para 3.10.2. Embolden **‘designing out the effects of flooding’** in support of Chapter 9.

User:	London Borough of Lewisham
Questions have been raised that D10 is too detailed and will be too onerous if it is applied to all development, as Secure by Design consultees struggle to provide comments even on a limited number of applications.	

User: London Borough of Brent

The emphasis should be on application in perceived higher risk locations / buildings only where impacts could be significant. It is not clear what detection means, implying longer term intelligence/monitoring rather than attributes associated with promoting natural surveillance. In relation to planning matters, rather than those covered by for instance building control, more emphasis could be placed on the importance of designing egress and ingress routes relating to emergency and evacuation plans. Emergency exits are not necessarily the same as this, as general main egress and ingress routes for buildings/areas with potential for large crowds need higher consideration.

Amend text to:

B "Development proposals should maximise the resilience of buildings resilience and places and minimise potential physical risks, including those arising as a result of fire, flood and related hazards. Development with potential perceived higher risk/significant adverse outcomes should include physical measures to design out crime that – in proportion to the risk – deter terrorism and help mitigate its effects. In addition consideration should be given to importance of designing egress and ingress routes relating to emergency and evacuation plans, particularly where this relates to large volumes of people. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area."

User:	Save Swiss Cottage

D10 Safety and security and resilience to emergency
Designing out crime should be mentioned in the policy (as well as in supporting text).

User:	London Borough of Bromley
The policy is supported.	

User:	London Councils

Although generally supported, this policy does not address the question of who will fund protective measures in new developments. Boroughs planning departments have intense pressure on resources, and it is likely that such provisions will need to be provided by planning obligations on development. However, these can have an impact on the viability. The GLA should clarify how it expects safety and security provisions on development to be funded.

User:	London Borough of Tower Hamlets

We are broadly supportive of this policy which replaces policy 7.13 in the current London Plan.
However the policy has been updated to include additional information in relation to counter terrorism/resilience but has less emphasis on other forms of antisocial behaviour. For example there is no reference to lighting or blank frontages, although it is noted that natural surveillance is mentioned in policy D7 on public realm. It is noted that current policy 7.3 on designing out crime does not appear to have been replaced and as such the approach in the draft policies appear to be too narrowly focussed on particular elements of counter terrorism and other areas of security that would enable future developments to be resilient appear to have been neglected. This should be addressed.

User:	Royal Borough of Kingston
Support.	

User:	London Borough of Waltham Forest

We agree that all buildings should achieve the highest standard of fire safety. However, we do not consider that this lies within planning. Such issues should be dealt with via architectural process and Building Regulation under Fire Safety Approved Document Part B. Planners do not have training in fire safety and would not be able to properly assess any Fire Statement submitted. There are also resource implications for the London Fire Brigade and planning departments if such a responsibility were to lie within planning departments at borough level.

User:	HFFTRA

D10 Safety and security and resilience to emergency

Designing out crime should be mentioned in the policy (as well as in supporting text).

User:	London Borough of Hackney
Hackney supports this policy.	

User:	Westminster City Council

The emphasis on safety, security and resilience at the core of new developments, as well as refurbishments, and the early consultation of the London Fire and Emergency Planning Authority (LFEPA) is supported. The importance of giving consideration to physical, personnel and electronic security in all new developments including streetscapes and public spaces is particularly relevant to Westminster.

User: InLinkUK

In addition to more traditional threats, in an increasingly online world it is important to consider emergencies relating to our digital infrastructure. For example, a cyber attack on our transport network has the potential to be far more disruptive and dangerous than a fire or flooding.

Recommendation #15

? That Policy D10 be updated to ensure it also highlights that London should be resilient against digital infrastructure related emergencies.

London also contains an increasing amount of private digital infrastructure, ranging from sensors to the screens and interfaces available on InLinks. This infrastructure can assist the Mayor can assist in ensuring and maintaining a safe and secure environment in London.

We are currently developing the updates that would allow for the overriding of InLink screens in an area for the issuing of warnings and information by police and other relevant authorities.

Recommendation #16

? That Policy D10 be updated to ensure the opportunity provided by London's digital infrastructure are fully utilised.

Similar considerations should be given to the streetscape with initiatives seeking to reduce excess street clutter given broad support to ensure the emergency services and other responders are not unnecessarily restricted from accessing an area or scene.

User:	Ministry of Housing, Communities & Local Government

We welcome the references in the draft plan to ensuring a safe and secure environment in London, so that there is resilience to emergencies, including terrorist attack. The current terrorist threat level is SEVERE, meaning an attack is highly likely. The five terrorist attacks, which occurred in London and Manchester in 2017, resulted in 36 fatalities. Since March 2017, the Security Service and the police have thwarted ten terrorist plots in Great Britain. It is vital that all authorities with responsibility for safety and security challenge their existing strategies and plans to deal with terrorist threats. In particular it is integral that development proposals, both those undertaken by local authorities and those developed by others that are considered through the planning process, incorporate measures that are appropriate and proportionate to the threat of an attack and the likely consequences of one.

User:	London Borough of Southwark
Officers recommend paragraph 3.9.4 adds “air quality” to the list in the last sentence of the paragraph.	

User:	London Borough of Wandsworth

The Council welcomes the recognition of measures to design out crime which the Councils Local Plan supports.

User: The Northbank BID

Policy D7: Public Ream, D10: Safety, security & resilience to emergency

We support policies D7 and would like include the needs of future technology, area management to reduce crime and antisocial behaviour. Area resilience is a high priority for Northbank area to ensure businesses and people are safe.

- Funding
- Working with Boroughs and BID as driver for public realm enhancements
- Public realm design that encourages sustainable choices and behaviour change

D7: The River Thames
It would also be beneficial for the management of the River Thames and the Thames walkways, if their role in the public realm was acknowledged here. Although the statement in para 9.14.8 (p 367), that the River Thames should not be designated as Metropolitan Open Land, is welcome and this should remain the position, a statement here about the role of the River Thames would be appropriate.
The River Thames is the defining landscape, historic and natural feature of London. We believe it should feature more strongly in London Plan policies and that more emphasis is given to addressing routes along it and the positive economic, social and environmental contribution it makes. The London Plan has a particularly important role in providing a coherent approach given the Thames passes through so many boroughs.

We welcome that “use and enjoyment” of the Thames is identified as a strategic function of the Central Activities Zone and some protection afforded the Thames from tall buildings in Policy D8 and in strategic views (Policy HC3). Policy SI14 is especially welcome in encouraging the identification of Thames Policy Areas. We recommend that Policy D7 is amended explicitly to recognise the importance of the public realm provided by and along the Thames, including specific reference to the need for expansive, continuous public access to the riverfront. The River’s potential in terms of freight movements should also be recognised and supported at appropriate points in this draft London Plan.

User:	London Borough of Richmond Upon Thames

The Council supports the maintenance of safe and secure buildings and environment and collaborates with the various emergency Authorities in London. Technical mandatory requirements as set out in Part Q Building Regulations (e.g. secure doorsets and windows) are set out in SPG related to Designing out Crime.

User:	London Borough of Harrow

The Council supports this policy. However, there needs to be clarity on what the role of planning is and what is covered by other legislation, e.g. building regulations. Some of these elements, in association with policy D10 Safety, Security and Resilience to Emergency, currently unacceptably blur lines and increase expectations on planning which cannot be met as there is limited or no legal basis. This risk causing the potential for delay to or judicial review of decision making which might stray into other areas that are subject to other legislation outside planning. The London Plan will need to reflect the conclusions and Government response to the Independent Review of Building Regulations and Fire Safety expected from Spring 2018.

User:	London Borough of Harrow

The scope and application of this policy could be better defined, with a focus on perceived higher risk locations / buildings only where impacts could be significant. It is not clear what detection means, implying longer term intelligence/monitoring rather than attributes associated with promoting natural surveillance. The relationship between planning matters and other areas could be better defined (i.e. building control). Rather than covering issues addressed elsewhere (i.e. building control), more emphasis could be placed on the importance of designing egress and ingress routes relating to emergency and evacuation plans. Emergency exits are not necessarily the same as this, as general main egress and ingress routes for buildings/areas with potential for large crowds need higher consideration.

User:	London Borough of Havering

Paragraph 3.3.5.

This is a very positive statement around emergency evacuation linked to the DDA.

Paragraph 3.10.1

Reference should be made to all London Boroughs having a Borough Risk Register

User:	The Wimbledon Society
D10: Vulnerable uses eg housing should not be built in flood zones 3A and 3B	

User:	London Borough of Newham
LBN support this policy and it is considered to be complementary to Newham’s Draft Revised Local Plan	

User:	Just Space
No comment	

User:	London Borough of Bexley

Policy D10 Safety, security and resilience to emergency reiterates the need for design to consider how to create protection from and resilience to emergencies.

User:	Mr Liam Kelly

This Policy would be enhanced by the maintenance of existing/or provision of new community centres with budgetary allocation from relevant CIL/s106 agreements

User: London NHS Clinical Commissioning Group

Policy D10 Safety, security and resilience to emergency

We suggest that policy should refer to the NHS as a member of the London Resilience Partnership where there is a commitment to develop joint Emergency Preparedness Plans. We suggest that the policy should reference the need to ensure that new development maintains and improve, where possible, access to emergency service infrastructure, including ambulance access to A&E departments at hospitals.

User:	Chartered Institute of Architectural Technologists

Policies D7, D8, D9, D10, D12 & D13

We are in agreement with the proposals contained in the plan.

User:	British Property Federation

We support the Mayor’s intentions to work with partners and ensure London’s safety from emergencies such as fire, flood, weather, terrorism and related hazards. However, we recommend that central government is more proactive in ensuring that security provisions and initiatives are defined, supported and employed across local authority areas. One way of ensuring this approach would operate effectively would be to initiate a template of good practice for local security provision, consisting of a short explanation about the security initiative, a series of actions that those in the area should undertake and recommendations about how the area can recover from hazards, should they occur.

User:	Benhill Residents
Designing out crime should be mentioned in the policy (as well as in supporting text).	

User:	Elaine Chambers

D10 Safety and security and resilience to emergency

Designing out crime should be mentioned in the policy (as well as in supporting text).

User: Earls Court Public Sector Tenants' Assoc

Designing out crime should be mentioned in the policy (as well as in supporting text).

In the light on the Grenfell Tower tragedy many are concerned about the safety of tall buildings. The Mayors' office should work with relevant authorities to collate, monitor and update data relating to fire safety in relation to new construction materials and methods of construction as well as on detection and prevention of spread of fire. and means of escape.

Policy will need to reflect any recommendations that come out of the Grenfell Inquiry.

User:	London Borough of Sutton
SUPPORT . The London Borough of Sutton supports the broad approach to safety, security and resilience.	

User:	Alzheimer's Society

1. Policy **D10** deals with resilience in the event of an emergency. Gloucestershire Fire and Rescue recently identified that their major accident planning did not comprehensively cover people with dementia, and so they invited Alzheimer’s Society to take part in a couple of drills with them to ensure they were better prepared. People with dementia can easily become distressed in unfamiliar surroundings and this is heightened during a time of great stress. We would like to ensure that the needs of those with dementia are addressed in the London Risk Register.

User: Metropolitan Police Service

Policy D10 Safety, security and resilience to emergency
The Mayor uses his convening power to work with relevant partners and stakeholders to ensure and maintain a safe and secure environment in London that is resilient against emergencies including fire, flood, weather, terrorism and related hazards as set out in the London Risk Register.
A) Boroughs should work with their local Metropolitan Police Service 'Design Out Crime' officers and planning teams, whilst also working with other agencies such as the London Fire and Emergency Planning Authority, the City of London Police and the British Transport Police to identify the community safety needs, policies and sites required for their area and to support provision of necessary infrastructure to maintain a safe and secure environment.
The MPS ask this be amended to "Boroughs should actively engage with their local Metropolitan Police Service 'Design Out Crime' officers and planning teams, whilst also working with other agencies such as the London Fire and Emergency Planning Authority, the City of London Police and the British Transport Police to identify the community safety needs, policies and sites required for their area, and to support provision of necessary resilient buildings and infrastructure that maintain a safe and secure environment and reduce the fear of crime."
B) Development proposals should maximise building resilience and minimise potential physical risks, including those arising as a result of fire, flood and related hazards. Development should include measures to design out crime that – in proportion to the risk – deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area.
The MPS ask this be amended to "Development proposals should maximise building resilience and minimise potential physical risks, including those arising as a result of fire, flood and related hazards. Development should always seek to include measures to design out crime that – in proportion to the threat – deter, detect and mitigate terrorist activity and its effects. These measures should be considered at the start of the design process to ensure they create a coherent, interlinked security regime that is (where required) aesthetically integrated into the development and the wider environment."
3.10.3 Measures to design out crime, including counter terrorism measures, should be integral to development proposals and considered early in the design process (31.) This will ensure they provide adequate protection, do not compromise good design, do not shift vulnerabilities elsewhere, and are cost-effective. Development proposals should incorporate measures that are proportionate to the threat of the risk of an attack and the likely consequences of one.
The MPS ask this be amended to "Measures to design out crime, according to the Secured by Design Scheme, including counter terrorism measures, should be integral to development proposals and considered early in the design process. (31.) This will ensure they provide

adequate protection, and cost effectiveness does not compromise good design, or shift vulnerabilities elsewhere. In order to be effective, the measures to be incorporated into the development proposals must be proportionate to the assessed threat of or potential risk of an attack and the likely consequences of one."
DOCOs act as first points of contact and will refer developers and architects to Counter Terrorism Security Advisors where appropriate
3.10.4 New development, including streetscapes and public spaces, should incorporate elements that deter terrorists, maximise the probability of detecting intrusion, and delay any attempts at disruption until a response can be activated. Consideration should be given to physical, personnel and electronic security (including detailed questions of design and choice of materials, vehicular stand off and access, air intakes and telecommunications infrastructure). The Metropolitan Police (Designing Out Crime Officers and Counter Terrorism Security Advisors) should be consulted to ensure major developments contain appropriate design solutions, which respond to the potential level of risk whilst ensuring the quality of places is maximised.
The MPS ask this be amended to: "New development, including streetscapes and public spaces, should focus on creating effective protective security environments by drawing upon current Counter Terrorism principles. This comprises of designing in measures that deter terrorists, maximises the probability of their detection, and delaying/disrupting their activity until an appropriate response can be deployed. When considering appropriate protection against terrorist attack, there is an expectation that Metropolitan Police (Design Out Crime Officers and Counter Terrorism Security Advisors) will be consulted at an early stage, to ensure major developments contain design solutions, that are appropriate and able to mitigate the potential level of risk, whilst ensuring that good quality urban and environmental design principles are maintained."

User:	London Borough of Ealing

The topic of resilience is much broader than the narrow design and contingency considerations covered in the policy. The plan should commit to a programme which co-ordinates the large emergency response infrastructure already extant in London with strategic and local plans. This will improve the resilience of the built environment and reduce exposure to sequential failure when this infrastructure comes under pressure.

User:	London Chamber of Commerce and Industry

Policy D10 Safety, security and resilience to emergency

42. LCCI recognises that the emergency services have regularly reviewed and exercised plans to keep London safe and secure in the event of an incident. With the scale of the capital's housing crisis, the capital's pending 'megacity' population of 10 million and feedback we have received from representatives of London's blue light personnel about housing, it is the potential challenges and pressures likely generated from extended resilience scenarios that need to be examined.

43. A full review - with direct engagement with representatives of London's blue light workers - on London's ability to deal with major event scenarios of a prolonged duration would be beneficial.

User: London Chamber of Commerce and Industry

Policy D10 Safety, security and resilience to emergency

54. We welcome that the draft new London Plan notes that the shortage of affordable housing in the capital is hindering the recruitment and retention of public service workers including those crucial to the operation of the emergency services.

55. Our 2014 Housing report noted there was a need to consider how the undersupply of housing could affect future London resilience (it is important to emphasise that LCCI raises the point about resilience with matters of an extended duration in mind).

56. Two years later our research found that the majority (54%) of London's 'blue light' emergency services workers – police officers, firefighters, ambulance paramedics – live outside London. At that time, we called on the Mayor of London to consider how this finding could impact on London's ability to deal with a major incident.

57. We believe that the Mayor should include an alteration to the London Plan to formally identify the need for specialist emergency services worker housing as an important planning issue for London.

58. To deliver this housing, and given the capital's finite amount of space, LCCI advocates utilising land within the Metropolitan Green Belt. Whilst the National Planning Policy Framework (NPPF) states the purpose of the Green Belt is "to prevent sprawl of large built-up areas", the Green Belt is not actually an environmental designation.

59. Within Brown for Blue, LCCI has identified 329 hectares of 'brownspace' within the capital's Green Belt which could be used to build up to 20,000 homes. We believe these could be prioritised for the capital's emergency services personnel.

User: CIBSE

Resilience to flood – see more detailed comments in responses to Chapter 9

There is no explicit reference to cybersecurity. In larger buildings with automated control systems there is a requirement to consider this issue. It is understood that due to the nature of this topic what is publicly stated needs to be considered with care. CIBSE would be willing to discuss this in greater detail with the Mayor's team.

On resilience to fire hazard, see response to policy D11

User: BEE Midtown

Midtown is an area with low crime levels. However, as with various Central London locations, mobile phone thefts have become increasingly common within the area. We are currently working with local police to draft measures to tackle this, in addition to working with leisure businesses in the area on the implementation of measures to help protect customers.

In Islington, the cumulative impact areas have been successful in reducing crime, antisocial behaviour and ambulance call-outs across the borough. Our work in previous years has contributed to a 9 per cent fall in calls to police about anti-social behaviour and a 24 per cent fall in calls to the Council's out of hours anti-social behaviour team. We will continue to work with the police, the Safer Streets team and Islington to maintain this.

Similarly, throughout our time working with Camden Council, crime has reduced by 25 per cent in the area. We hope to continue to work with the Metropolitan Police and Camden to keep the area a safe place to work and socialise.

More broadly, we are working with homelessness charities, local authorities and local police to implement measures which crack down on professional beggars and safeguard the wellbeing of vulnerable homeless individuals.

User:	Mr Gary Hayes

D10 Safety and security and resilience to emergency

Designing out crime should be mentioned in the policy (as well as in supporting text).

User:	London Borough of Brent

The principle of inclusive design is supported. The need to provide additional reassurance post Grenfell Tower is understandable, particularly as it is likely that the plan will essentially require taller buildings to meet development capacity needs. There however needs to be clarity on what the role of planning is and what is covered by other legislation, e.g. building regulations. Some of these elements, in association with policy D10 Safety, Security and Resilience to Emergency, currently unacceptably blur lines and increase expectations on planning. This risks causing the potential for delay to or judicial review of decision making which might stray into other areas that are subject to other legislation outside planning. The London Plan will need to reflect the conclusions and Government response to the Independent Review of Building Regulations and Fire Safety expected from Spring 2018.

User:	Andrea Carey Fuller
Designing out crime should be mentioned in the policy (as well as in supporting text).	

User: Socialist Health Association London

Policy D10 Safety, security and resilience to emergency

Some of our members are involved with the London Ambulance Services Forum – indeed the chair of the Forum is a member. We are very concerned that despite the best efforts of dedicated staff, the service continues to be in the Requires Improvement category – we hope that City Hall can press for more government funding and training resources. Staff numbers are also badly affected by the cost of London housing.

We are also concerned about the re-categorisation of emergencies by government which essentially downgrades certain patients in terms of response time.

These are vital aspects of our readiness to deal with an emergency - when large numbers of units are taken to one area to deal with an emergency, the impact on other parts of the capital can be significant.

Fire Rescue and Fire Safety

The General Secretary of the Fire Brigades Union recently addressed a meeting of SHA London.

96-97% of London firefighters are members of the LFBU.

Since Boris Johnson accusing Andrew Dismore of talking ‘cobblers’ about the dangers of shutting fire stations, we now need to be sure that we maximise on our fire service, both in terms of infrastructure and the welfare of personnel.

Clearly Grenfell has put the service into the spotlight that it always deserved.

50% of fire service capacity has been lost since 2005

The Met’s investigation involves interviewing 1,000 fire personnel.

‘This is a resourcing challenge all round’ Mat Wrack.

There is a great risk that Grenfell will be consigned to a decades long battle like Hillsborough families have had to endure.

Questions :

How do we stop this happening again?

How ready are we to intervene ? What if this occurred in an area with poor resourcing?

Fundamentally, how can homes – or indeed any building, be covered in petrol cladding?

How can there be no recognised fire safety standards when buildings are assessed ?

The Public inquiry Terms of Reference are insufficient to ensuring the risk is minimised and the families affected are respected and looked after.

This includes fire fighters who were exposed to toxic substances and extreme mental health stresses at the incident – as they often are, but Grenfell was much more extreme.

Shockingly, there is no formal route for fire service workers to raise concerns.

It is clear that an incident of the size, scale and shock of Grenfell has left a considerable amount of toxic particulates in the locality. This is also a concern for local residents who are also battling with their own emotional impacts.

Major health concerns for firefighters are :

PTSD – which can emerge over months and years.

Even after the shock of Grenfell it may emerge much later.

Cancers – from exposure to contamination and toxins

>> We recommend that City Hall set up a specialist route for fire fighters to report health issues and other concerns

User: UK Power Networks

Flood Resilience

We have sought to deliver flood protection measures in London that are cost efficient and deliver the maximum risk reduction to improve the number of customers protected. Resilience in the supply network ensures that customers supply can often be quickly re-established at minimal inconvenience following flooding of critical equipment. Flood mitigation of vulnerable sites are prioritised where there are high numbers of 'unrecoverable[24]' customers connected to a vulnerable site.

Since 2011 in excess of twenty vulnerable substations have been protected from flooding in London with a similar number in the pipeline for protection during the remainder of the RIIO-ED1 period. This amounts to nearly half a million additional customer supplies protected. Flood events such as the incidents in Tooley Street, London (April 2008 and May 2009) have highlighted the risk that substations (particularly subterranean sites) are subject to surface water flooding. As a result, our London flood programme has focused primarily on surface water flood protection at sites with plant and equipment below ground level. Following site-specific assessments, at risk sites have had flood protection measures in the form of bunding, floodgates and sealing of duct and cable entries implemented during the past few years to mitigate this risk.

Where substation sites are developed and new buildings and plant are installed, guidance documents are available to assist engineers and third parties in identifying flood risk and protecting new plant and equipment. This will normally be achieved by raising the critical equipment above the environment agency 1:100 or 1:1,000-year flood levels.

[24] Many substations have high levels of interconnection, meaning load can be transferred from site to site to manage demand. 'Unrecoverable' customers are defined as those customers who cannot have their supply switched to an alternative substation (i.e. one not affected by a flooding event) due to limited interconnection at the flooded site

User: UK Power Networks

Cyber Resilience

The protection and resilience of our information systems and operational technology is of critical importance to UK Power Networks. We have a dedicated Cyber Security team and specialist support partners who oversee and operate a comprehensive set of cyber controls and measures. These are aligned to ISO27001, complaint with the Smart Energy Code and positioned to address all the requirements of the forthcoming Network and Information Systems (NIS) Directive.

Our cyber security strategy is underpinned by the following hygiene factors which are embedded into the design, build, testing and operation of our IT systems and processes:
? Least Privilege – only allowing minimum necessary access with strong authentication methods;
? Segmentation – designing the IT systems and networks in a way that provides defence in depth against cyber-attacks;
? Resilience Testing – routinely moving our IT application and services to failover states to validate their health and reliability;
? Continuous 24/7 monitoring - detecting and reacting to cyber threats and attacks at the earliest opportunities;
? Practising Incident Response – routinely exercising our processes against realistic attack scenarios;
? System Maintenance – operating a continuous monthly cycle to apply security updates;
? Advanced Security Testing – routinely testing our networks & systems with skilled ethical hackers; and
? Security Awareness & Education – Using our ‘Security Matters’ campaigns to continuously provide our people and partners with the knowledge and skills to better protect our information and systems (including continuously sending test phishing emails randomly across all our email users to assess their vigilance levels)

We recognise that swift and effective exchange of security intelligence and learnings with our industry peers and government stakeholders is vital to protecting our business and ultimately the UK’s critical national infrastructure, particularly given the strategic importance of London.

User:	London Borough of Bexley

Finally, there are numerous cases of repetition between policies, which provide opportunities to condense and combine them. For example, **Policy D11 Fire safety** could be incorporated as one part of **Policy D10 Safety, security and resilience to emergency**. Whilst it is understood that the creation of a separate policy places an emphasis on the importance of a particular ambition, the Council is conscious that planning documents should be understandable and accessible, both for professionals and for the public. Policies should be clear but also comprehensive; having different policies address the same issue raises the possibility of planning decisions failing to give due regard to material considerations. It also makes the document rambling and confusing in places, and thus inaccessible to the public, meaning that local people have yet another barrier to overcome to engage effectively with the planning system.

Policy D11 Fire safety

User: London Borough of Wandsworth

The rationale for the new policy on Fire safety standards is understood and the Council wouldn't disagree with importance of fire safety; but this goes beyond the remit of planning and is already dealt with via Building Regulations; there is a danger that new fire safety requirements within planning will require new skills by case officers and could potentially delay the planning application process, particularly if Fire Statements have to be verified. The policy creates legal uncertainty of refusing an application without a Fire Statement as this is considered under a different legislative framework.

The Policy is already covered under the Building Regulations part B B1
Means of Warning
and Escape, B2 Internal Fire Spread (Linings), B3 Internal Fire Spread (Structure), B4 External Fire Spread and B5 Access and Facilities for the fire service. Additionally, the Regulatory Reform Fire Safety Order (2005) requires premises to have a fire risk assessment provided by a competent person which can be produced on demand for the fire authority and relates to the occupation of the premises which can also address the fire strategy, specific design details and operating factors presented by the occupation of the premises. Part B1 will also address (along with the RRO) specific evacuation plans for the disabled in addition to the facilities for evacuation required in the design under part B1.

The Building Regulations and allied legislation already addresses these issues in depth and the inclusion as a policy is unnecessary as it is covered by the Building Control Body.

User: London Borough of Richmond Upon Thames

The rationale for the new policy on Fire safety standards is understood and the Council wouldn’t disagree with importance of fire safety; but this goes beyond the remit of planning and is already dealt with via Building Regulations; there is a danger that new fire safety requirements within planning will require new skills by case officers and could potentially delay the planning application process, particularly if Fire Statements have to be verified. The policy creates legal uncertainty via refusing an application without a Fire Statement, as this is considered under a different legislative framework.

The Policy is already covered under the Building Regulations part B B1

Means of Warning

and Escape, B2 Internal Fire Spread (Linings), B3 Internal Fire Spread (Structure), B4

11

External Fire Spread and B5 Access and Facilities for the fire service. Additionally, the Regulatory Reform Fire Safety Order (2005) requires premises to have a fire risk assessment provided by a competent person which can be produced on demand for the fire authority and relates to the occupation of the premises which can also address the fire

strategy, specific design details and operating factors presented by the occupation of the premises. Part B1 will also address (along with the RRO) specific evacuation plans for the disabled in addition to the facilities for evacuation required in the design under part B1.

The Building Regulations and allied legislation already addresses these issues in depth and the inclusion as a policy is unnecessary as it is covered by the Building Control Body.

User:	Royal Borough of Greenwich

We share the Mayor’s view that buildings within London should achieve the highest standards of fire safety. To enable the effective implementation of this Policy D11, we would ask for further clarity regarding who can be considered a suitability qualified assessor. This is needed to enable boroughs to have the right type of resources in place to thoroughly evaluate statements.

User: London Borough of Harrow

The Council support the aspirations of the draft policy in terms of ensuring the safety of London's population.

The Council however has a number of concerns regarding the practicality of this policy.

The scope and applicability of the policy needs to be better defined with respect to what issues it is seeking to respond to (understood to be the Grenfell Tower disaster). Seeking a Fire Statement for all major developments (i.e. ten dwellings or above) does not have regard to where such a requirement (above that required by the Building Regulations) would add value and address the identified issues that the policy seeks to respond to. Such a requirement would apply to low-rise, small scale infill development of ten units, where fire safety issues are less complex than a tower block of 20 storeys / 200 units (as an example).

There are proposed changes to the Building Regulations imminent. It is queried if there have been any discussions between the Mayor (and GLA family) and Government relating to changes to building control regulations. There is an overriding concern that the standards / requirements that the Mayor is setting out in policy are inconsistent with other legislation and therefore undermine the achievement of the policy's objectives. The Council feels that the London Plan needs to provide greater clarity on these issues and ensure that the scope of its proposed policies avoids duplication of responsibilities.

If the Mayor chooses to continue with the policy as drafted, then the Council would suggest that the Mayor needs to consider / provide guidance/detail on how the required 'Fire Statement' would be agreed and implemented as there are a number of practical issues. For example, how would a variation to an approved planning permission be dealt with if Building Regulations approvals / detailed design result in an alternative strategy. This exercise is likely to demonstrate the conflict between the Mayor's approach and established legal frameworks.

The Council is concerned how the review of such a document would be resourced given that an independent review maybe required — or how payment for under resourced Building Control Departments to review/negotiate with developers would be secured.

The Council would request that the Mayor provides clarity on what is the 'highest standards' as set out in D11(A). Currently the Building Regulations only require the minimum requirement. The Mayor must specify what standards (above the Building Regulations) would be required and be part of the policy.

User: London Borough of Harrow

The Council support the aspirations of the draft policy in terms of ensuring the safety of London's population.

The Council however has a number of concerns regarding the practicality of this policy.

The scope and applicability of the policy needs to be better defined with respect to what issues it is seeking to respond to (understood to be the Grenfell Tower disaster). Seeking a Fire Statement for all major developments (i.e. ten dwellings or above) does not have regard to where such a requirement (above that required by the Building Regulations) would add value and address the identified issues that the policy seeks to respond to. Such a requirement would apply to low-rise, small scale infill development of ten units, where fire safety issues are less complex than a tower block of 20 storeys / 200 units (as an example).

There are proposed changes to the Building Regulations imminent. It is queried if there have been any discussions between the Mayor (and GLA family) and Government relating to changes to building control regulations. There is an overriding concern that the standards / requirements that the Mayor is setting out in policy are inconsistent with other legislation and therefore undermine the achievement of the policy's objectives. The Council feels that the London Plan needs to provide greater clarity on these issues and ensure that the scope of its proposed policies avoids duplication of responsibilities.

If the Mayor chooses to continue with the policy as drafted, then the Council would suggest that the Mayor needs to consider / provide guidance/detail on how the required 'Fire Statement' would be agreed and implemented as there are a number of practical issues. For example, how would a variation to an approved planning permission be dealt with if Building Regulations approvals / detailed design result in an alternative strategy. This exercise is likely to demonstrate the conflict between the Mayor's approach and established legal frameworks.

The Council is concerned how the review of such a document would be resourced given that an independent review maybe required — or how payment for under resourced Building Control Departments to review/negotiate with developers would be secured.

The Council would request that the Mayor provides clarity on what is the 'highest standards' as set out in D11(A). Currently the Building Regulations only require the minimum requirement. The Mayor must specify what standards (above the Building Regulations) would be required and be part of the policy.

User: London Borough of Harrow

It is impossible to provide a policy for the ‘likely behaviour of people and expectations’ — the document should be technically sound and easy to be understood by lay people. Amend this paragraph as follows;
... and providing suitable and convenient means of escape **which all building users can have confidence in,** applications should consider issues of fire safety before building control application stage, taking into account the diversity of **and likely behaviour of** the population as a whole (**delete bold sections**).

Whilst it is encouraged that materials are thought out at an early stage of any development, the majority of planning applications secure details of materials by way of condition, once the principle of development (i.e. use, scale, massing, layout etc) have been agreed by grant of planning permission. If details are agreed (as part of a Fire Strategy) at application stage there is concern that this will create additional work (and delay) at detailed design stage and construction where details may change and therefore require amendment of the Fire Strategy through the amendment of relevant conditions / approved drawings.

User:	London Borough of Harrow

Building regulations only require developments to think of the use of sprinklers, but does not require their use. The Mayor should qualify if these would be a requirement or not. If so, they must be set in policy, or just remove their reference. The Council would also query that if this now a requirement, what impacts would this have on scheme viability.

User:	London Borough of Harrow
A concern that there is a conflict with Policy D5, paragraph 3.5.6.	

User:	London Borough of Havering

The need for LPA’s to assess Fire Statements will have resource implications including for the London Fire Brigade.

The draft London Plan should refer to Dame Judith Hackitt’s independent review of building regulations and fire safety following Grenfell Tower as it will have major impact on future construction.

User: London Young Labour

Fire Safety

In the aftermath of the appalling tragedy in Grenfell we fully support the commitments to fire safety outline in Policy D11, particularly regarding sprinklers and other assessments (3.11.3), independent fire statements (3.11.5), robust evacuation procedures (3.5.5), and safety measures in tall buildings (3.8.4). As in many areas we believe City Hall can play a crucial oversight function and we would encourage it to use all its powers available to ensure developers are kept to the strictest possible interpretation of the measures it outlines in D11.

User:	London Borough of Newham

This policy is supported by LBN. It is noted that this policy echoes building regulation requirements and therefore, local authorities will need to set up a system to ensure that these points are addressed by both planning and building control.

User: TUC London, South East and East of England

Policy D11: Fire Safety

1. Buildings that require a fire inspection should be inspected by the Fire Brigade.
2. Existing tall buildings should be retrofitted with sprinkler systems to provide equivalence of protection with the required provision in newly constructed buildings.
3. Tall buildings should have at least two fire protected escape stairwells.
4. Building regulations for the flammability of materials, installation methods, risk of fire spread and quality of installation should be thoroughly over-hauled and re-specified, and robustly enforced.

User:	Just Space
No comment	

User: Inclusion London

Policy D8 Tall buildings

Policy D11 Fire safety

As mentioned previously the Grenfell tower disaster highlighted concerns about the lack of effective evacuation policies for Disabled people in emergencies such as fire, particularly regarding tall buildings, this situation needs to improve so an effective strategy to evacuate Deaf and Disabled people is always in place.

User:	London Borough of Bexley

Policy D11 Fire safety also address fire safety, with a particular emphasis on features to reduce the risk to life and to minimise the spread of fire, designing a means of escape, and ensuring access to firefighting equipment. Whilst the Council supports these ambitions, where these issues are already addressed in the Building Regulations, there should not be repetition or perhaps even contradiction in planning policy. On fire safety, for instance, the government is undertaking a review, and there is concern that the draft London Plan pre-empts the outcome of that review. Where these issues are not addressed by the Building Regulations, it is recommended that the policies related to emergencies are consolidated into one policy. Creating one policy which comprehensively addresses these issues will ensure a more consistent approach in planning decisions, and will make the draft Plan less confusing.

User:	Mr Liam Kelly

Post Grenfell, it is clearly imperative that clear lines of accountability and transparency are publically available and all relevant recommendations of the London Fire Brigade are adhered including the provision of sprinklers or suitable equivalent in high rise public and residential buildings. The LFB should be the final arbiter of fire safety quality.

User: National Housing Federation

The National Housing Federation and our members are actively involved in the Independent Review of Building Regulations and Fire Safety, led by Dame Judith Hackitt, as we recognise the importance of contributing towards a new, fit for purpose system of regulation for high risk and complex buildings. Given the review's timescales, Dame Judith hopes to publish her final recommendations in spring 2018, we believe it is important for specific proposals regarding the fire safety of buildings, and associated regulatory or planning requirements placed upon developers, to take into account the review's recommendations.

The requirement for all major development proposals to be submitted with a Fire Statement produced by an appropriately qualified third party seems sensible and appropriate. However, to ensure the future regulatory regime for fire safety is effective and coherent we believe the Mayor should await the recommendations of the review before finalising such a requirement.

User: Revo

We support the Mayor’s intentions to convene partners to ensure a safe and secure environment in London, and protect against emergencies such as fire, flood, weather, terrorism and related hazards. Learnings should also be shared across boroughs from recent security experiences as well as ensuring good practice is delivered in public spaces across the city, particularly where public and private developments meet or in high risk areas.

We fully support efforts to achieve the highest possible standards of fire safety for new buildings in London. Recent events speak to the urgency of this issue and we look forward to working with the Mayor and central Government on building regulations and safety.

However, we agree with other industry bodies that there is a need for clarification in terms of a precise understanding of what is considered to be the ‘highest fire safety standards’ as technology and our understanding continues to evolve, and how this applies to various sectors and property types based on their scale or function (commercial, residential, mixed-use et al). We look forward to more detail in due course.

User:	Kingston and Surbiton Constituency Labour Party

D9 and 11 we welcome policies on basement development and fire safety.

User: Chartered Institute of Architectural Technologists

Policy D11

Whilst we acknowledge the requirement for ensuring Fire Safety, we would suggest that implementation and enforcement of Fire Safety should be managed by the Building Regulations and not through planning legislation. It would be our recommendation to work with the groups currently investigating improvements in practices and await the outcomes before committing to processes that may be superseded in the short term.

User:	Notting Hill Housing Trust

NHHT is pleased to note that the new London Plan introduces a policy on fire safety. NHHT is committed to ensuring that the homes we build keep our residents safe in the event of a fire. We have already begun to incorporate fire safety features that exceed Building Regulation requirements and also are in alignment with DCLG advice. NHHT now ensures that all of our new buildings are designed to incorporate an entirely non combustible insulation material. This type of insulation was not as widely used by the construction industry and therefore presenting new challenges in NHHT's ability to achieve the required 10% over part L as stated in the explanatory text to Policy SI2 Minimising greenhouse gas emissions. A more detailed explanation will be provided in comments to Policy SI2. NHHT welcome further clarity on the Mayor's view on the interrelationship between the current fire prevention construction methodologies and the Mayor's new fabric improvement targets.

User:	British Property Federation

We would encourage the Mayor to await the results of the Hackitt Review before making changes within this policy area. A further layer of policy may have the unintended consequences of confusion and lack of clarity.

User:	London Housing Directors

It is welcome that Policy D11 will require all major developments to be submitted with a Fire Statement (an independent fire strategy produced by a suitably qualified assessor). Fire safety is of paramount important to boroughs and this policy is very welcome. However, the GLA needs to clarify and define the distinct roles of planning and of building control, and the relationship between them to best enhance public safety. Assessing fire safety will be a new role for development control officers and they may not have the correct expertise. Therefore, the GLA could also fund training for borough officers in order for them to comprehend and assess the quality of fire statements that are submitted with major planning applications.

User: 313-349 Ilderton Road LLP

Policy D11 Fire safety sets out standards for new development proposals to meet in the interest of fire safety including: designed to incorporate appropriate features which reduce the risk to life in the event of a fire; are constructed in an appropriate way to minimise the risk of fire spread; provide suitable and convenient means of escape for all building users; adopt a robust strategy for evacuation which all building users can have confidence in; provide suitable access and equipment for firefighting which is appropriate for the size and use of the development. In this regard all major developments should be submitted with a Fire Statement which is an independent fire strategy, produced by a third party suitably qualified assessor.
Fire Safety and general safety of all buildings is extremely important, however, established Building Regulations already adequately deal with the safety performance of new buildings. This policy will result in a crossover of specialisms and will ultimately only serve to slow the delivery of new development.

User: Benhill Residents

In the light on the Grenfell Tower tragedy many are concerned about the safety of tall buildings.

The Mayors' office should work with relevant authorities to collate, monitor and update data relating to fire safety in relation to new construction materials and methods of construction as well as on detection and prevention of spread of fire. and means of escape.

Policy will need to reflect any recommendations that come out of the Grenfell Inquiry.

User: Elaine Chambers

D11 Fire Safety

In the light on the Grenfell Tower tragedy many are concerned about the safety of tall buildings.

The Mayors' office should work with relevant authorities to collate, monitor and update data relating to fire safety in relation to new construction materials and methods of construction as well as on detection and prevention of spread of fire. and means of escape.

Policy will need to reflect any recommendations that come out of the Grenfell Inquiry.

User: Royal London

Policy D11 Fire Safety

Fire safety is a critical and essential requirement of new development and a responsibility that RL take extremely serious working with designers, tenants and suitably qualified inspectors. We however consider that the requirement for a Fire Statement for Major Applications as part of the planning process should be reconsidered.

LPA planning officers by their own admission are not suitably trained or qualified to assess a development proposal in relation to fire safety with any such requirement at best duplicates or at worst will undermine the existing clear building regulations regulatory route to assess and approve these arrangements.

User: Silvertown Homes

Fire safety matters are addressed via Building Regulations. Building Regulations are reviewed and updated separately from the planning process.

Policy D11 is counterproductive on this basis. The detailed information sought at the planning application stage will often evolve through the detailed design and construction process. Moreover, Building Regulations may change during this period making an originally submitted and agreed Fire Statement redundant.

Any applicant pursuing a scheme that it turns out not to be able to satisfy Building Regulations in this respect has done so at their own risk.

Fire safety matters should continue to be addressed by Building Regulations and not at the planning application stage. Policy D11 should be deleted.

Policy D3 will continue to refer to fire evacuation lifts.

User:	London Property Alliance
Detailed design matters are more appropriately addressed through Building Control and, where necessary, within local design policies.	

User:	Bishopsgate Goods Yard Regeneration Limited

Our client supports the Mayor’s efforts to achieve the highest possible standards on fire safety for new and refurbished buildings in London. However, there is a need for clarification in terms of a precise benchmark for ‘highest fire safety standards’. We look forward to more detail being provided on this matter in due course.

User: Barratt Developments plc

Fire safety matters are addressed via Building Regulations. Building Regulations are reviewed and updated separately from the planning process.

Policy D11 is counterproductive on this basis. The detailed information sought at the planning application stage will often evolve through the detailed design and construction process. Moreover, Building Regulations may change during this period making an originally submitted and agreed Fire Statement

Any applicant pursuing a scheme that it turns out not to be able to satisfy Building Regulations in this respect has done so at their own risk.

Fire safety matters should continue to be addressed by Building Regulations and not at the planning application stage. Policy D11 should be deleted.

Policy D3 will continue to refer to fire evacuation lifts.
redundant.

User:	London Borough of Sutton

SUPPORT. The London Borough of Sutton welcomes raising the awareness of fire safety matters but considers that the London Plan should make clear the roles and responsibilities of planning and other regulatory regimes. Issues that are pertinent to planning decisions include site access and exterior materials and wider consideration of fire safety could be addressed in supplementary guidance or by other legislation.

User:	PRP

PRP welcomes the inclusion of policies around fire safety following the tragedy at Grenfell Tower in 2017. However, a key challenge for the industry since Grenfell has been making adaptations to existing buildings where there are concerns over the safety of cladding already in place. PRP has had a key role in this, working for a number of organisations such as registered providers to submit applications to make changes to cladding. The way in which advice has been provided by individual boroughs and the approach to determination has varied significantly. Given the urgency and importance of these applications, PRP invites the Mayor to work closely with the boroughs to ensure a continuity to approach of recladding applications.

User:	One Housing Group

Draft policy D11: ‘Fire safety’

Draft policy D11 states that all major development proposals should be submitted with a Fire Statement produced by a third party suitably qualified assessor. OHG welcome this addition to the London Plan.

User:	Croydon Limited Partnership

Policy D11 states that all major development proposals should be submitted with a Fire Statement produced by a third party suitably qualified assessor. CLP welcome this addition to the London Plan.

User:	Clarion Housing Group

The London Plan needs to be able to respond to the significant shift in the approach to fire safety regulation underway. Early indications for this will emerge over the next 12 months as the recommendations of the Hackett Review are announced so the Plan’s polices must be closely aligned with national policy and the outcome of this Review.. The Plan polices should be worded to encourage the regulation changes to be implemented rapidly

User: Clarion Housing Group

Clause D11-B

All major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party suitably qualified assessor.

Wording the requirement for a Fire Statement as ‘should’ makes this less enforceable and unlikely to be implemented.

Clause D11-B Replace: ***All major development proposals must be submitted with a Fire Statement***

It is proposed that applications for all majordevelopments will have to be accompanied by an independent fire statement produced by a qualified third party assessor, setting out how the ‘highest standards’ will be achieved.

Insisting on fire statements only from external third party assessors is unnecessary and could needlessly increase costs. What’s important is that the person is qualified and competent with the experience to address the complexity of the design being proposed / built, not if they are internal or external to the business. It is imperative that one competent person is accountable for fire safety from inception to completion, not just the design stage. There are advantages as an internal employee understands the needs of a business and client constraints / risks which is not the case when appointing externally.

Clause D11-B Replace with: ***produced by a suitable qualified assessor, either a third party or an internal appointment, with demonstrable experience.***

User: Clarion Housing Group

Clause D11B –1) *The statement should detail how the development proposal will function in terms of:*

1) the building's construction: methods, products and materials used

Para 3.11.1. The principle behind explicitly considering fire safety from the very outset is incontestable. However even when the fire strategy is considered before building control application stage there are occasions when this strategy gets changed, amended or even value engineered out by the contractor. Para 3.11.2 rightly emphasises the need to embed and integrate the fire strategy within the design but what is needed are enforcement mechanisms; clear sanctions and regulations that a fire strategy agreed on a building at design stage is delivered to completion.

Clause D11-B 1) Add: ***and quality of construction from a fire perspective throughout the build, by a competent person with responsibility for Regulation 38***

Clause D11-B 6) Add: ***This Fire Statement needs to contain a plan for the provision of monitoring compliance at all stages in the construction handover and during occupancy.***

User:	Clarion Housing Group

Para 3.11.3 *"sprinklers installed in buildings can reduce the risk to life and significantly reduce the degree of damage caused by fire"*

Approved document B (section 0.16) already promotes installation of sprinklers in this way but it is rarely taken up unless it is a requirement. It is likely suppression systems will become a requirement for housing in England to mirror legalisation in Scotland and Wales.

Para 3.11.3 Replace with: ***Suitable suppression systems… must be explored at an early stage of building design.***

User:	Brent Cross Cricklewood Development Partners

Policy D11 states that all major development proposals should be submitted with a Fire Statement produced by a third party suitably qualified assessor. The DPs welcome this addition to the London Plan.

User:	Alzheimer's Society

1. People with dementia need to be considered at all stages of planning for an emergency. Policy **D11** covers Fire Safety and evacuation, including, in paragraph 3.11.4, the need for a safe and dignified escape route. The planning of these measures should involve people affected by dementia so that they have a chance to feed in to what measures will help them most in a time of emergency. This planning ahead, ensuring the measures are helpful, and ensuring people with dementia are familiar with them is the most important step that could be taken to keep people safe in an emergency.

User: Metropolitan Police Service

Policy D11 Fire safety

A In the interests of fire safety and to ensure the safety of all building users, development proposals must achieve the highest standards of fire safety and ensure that they: 3) provide suitable and convenient means of escape for all building users 4) adopt a robust strategy for evacuation which all building users can have confidence in 5) provide suitable access and equipment for firefighting which is appropriate for the size and use of the development. B All major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party suitably qualified assessor. The statement should detail how the development proposal will function in terms of: 4) how provision will be made within the site to enable fire appliances to gain access to the building.

3.11.2 The subject of fire safety is covered by Part B of the Building Regulations.
The MPS fully support this but ask the following addition is made to the last line of this policy: “Fire safety and security measures can be reconciled by early contact with a Designing Out Crime Officer at an early stage in the design process”

User:	London Borough of Ealing

The Council supports this policy and, in the light of the Grenfell fire, the mandatory requirement for an independent Fire Statement.

User:	Peabody

1. We support these proposals to ensure that fire safety is prioritised in new developments.

User:	Ballymore Group

Our client supports the Mayors efforts to achieve the highest possible standards on fire safety for new and refurbished buildings in London. However there is a need for clarification in terms of a precise benchmark for ‘highest fire standards’.

We look forward to more detail being provided on this matter in due course.

User: Association of Consultant Approved Inspectors (ACAI)

Chapter 3 – Design, Policy D11 – Fire Safety

D11. Section A

1. The policy aims for the highest standards of fire safety and does not refer to the minimum standards under Building Regulations – Approved Document B. So presumably under the planning regime there may be the opportunity for higher standards than Approved Document B to be applied ?
2. We note that the aim of this section is to reduce the risk to life, however, it should include “and serious injury”.
3. In regard to suitable access and equipment for fire fighting which is appropriate for the size of the development it should be based upon suitable risk assessments.

D11. Section B

Clarification on what is meant by ‘independent fire strategy’. Does this mean that a fire strategy is developed for the project AND an additional Fire Statement’ is produced by a third party… Is this meaning effectively a peer review of <u>any</u> strategy developed? What would they expect a suitably qualified assessor to mean?

1. Is this not part of a building regulation requirement. It may however make checking projects more straightforward for BC bodies as effectively a third party will be undertaking a considerable piece of work to assess the viability of the scheme – if I am reading that correctly?
2. Should be in the strategy anyway
3. Refers to ‘in an evacuation situation, but of course not all premises are evacuated…
4. Cannot 4 be incorporated into 3? as it is relevant to the items referred to in 3.

3.11.1

Emphasis again to fire safety needing to be considered at the earliest stages of development planning and procurement and reference to the highest standards of fire safety.

3.11.2

Why is ‘Highest standards of fire safety’ in bold? Is there an expectation that all complex projects are to meet a higher than minimum fire safety requirements found in the Building Regulations?
‘’taking into account the diversity of and likely behavior of the population as a whole” - This is implying an assessment of the population characteristics is fundamental, and we would not disagree. Will this mean a human behavior analysis will need to be undertaken?

3.11.3

Consideration should be given to existing buildings to have additional fire safety features otherwise not captured under the Building Regulations as a result of a ‘non worsening’ condition.

3.11.5

Definition of ‘major development’ is required. The requirement for Chartered Engineer registered with the engineering council may be too restrictive. The theory again is reasonably sound, but we haven’t got enough Chartered Engineers at present. There is only reference to Borough building control departments and not Approved Inspectors – is there a reason for that? This should be changed to read ‘Building Control Body’

User: CIBSE

It is important that the Mayor takes full account of the emerging findings of the Independent Review of Building Regulations and Fire Safety, especially with regards to high-rise and complex buildings, and those with vulnerable populations.

CIBSE is also currently finalising a new edition of CIBSE Guide E, Fire Safety, which is due to be published later in Spring 2018.

User: Mr Gary Hayes

D11 Fire Safety

In the light on the Grenfell Tower tragedy many are concerned about the safety of tall buildings. The Mayors' office should work with relevant authorities to collate, monitor and update data relating to fire safety in relation to new construction materials and methods of construction as well as on detection and prevention of spread of fire. and means of escape. Policy will need to reflect any recommendations that come out of the Grenfell Inquiry.

User: Redrow Homes London Division.

Fire safety matters are addressed via Building Regulations. Building Regulations are reviewed and updated separately from the planning process.
Policy D11 is counterproductive on this basis. The detailed information sought at the planning application stage will often evolve through the detailed design and construction process. Moreover, Building Regulations may change during this period making an originally submitted and agreed Fire Statement redundant.
Any applicant pursuing a scheme that it turns out not to be able to satisfy Building Regulations in this respect has done so at their own risk.

Fire safety matters should continue to be addressed by Building Regulations and not at the planning application stage. Policy D11 should be deleted.
Policy D3 will continue to refer to fire evacuation lifts.

User: Andrea Carey Fuller

In the light on the Grenfell Tower tragedy many are concerned about the safety of tall buildings.

The Mayors' office should work with relevant authorities to collate, monitor and update data relating to fire safety in relation to new construction materials and methods of construction as well as on detection and prevention of spread of fire. and means of escape.

Policy will need to reflect any recommendations that come out of the Grenfell Inquiry.

User:	Unknown

Whilst our client supports efforts to achieve the highest possible standards of fire safety for new buildings in London, this policy is too detailed for a planning policy and should not confuse planning material considerations with building control requirements. These standards have to be met under building regulations so do not need to be replicated in the London Plan.

User: L&Q

Fire safety

Fire safety matters are addressed via Building Regulations. Building Regulations are reviewed and updated separately from the planning process. Policy D11 is counterproductive on this basis. The detailed information sought at the planning application stage will often evolve through the detailed design and construction process. Moreover, Building Regulations may change during this period making an originally submitted and agreed Fire Statement redundant. Any applicant pursuing a scheme that it turns out not to be able to satisfy Building Regulations in this respect has done so at their own risk.

Fire safety matters should continue to be addressed by Building Regulations and not at the planning application stage. Policy D11 should be deleted. Policy D3 will continue to refer to fire evacuation lifts.

User: dp9

Policy D11 – Fire safety

We question the need for this policy and suggest that matters such as fire safety should be left to Building Regulations where there is the expertise to assess such matters. The requirement to submit a Fire Statement adds unnecessary cost and burden to the planning application process.

RECOMMENDATION: Delete the requirement to submit a Fire Statement and allow planning applications to summarise their fire strategy within a Design and Access Statement with the detail addressed through Building Regulations as is presently required.

User: Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living

D11 (134) - Fire Safety

Policy D11 proposes that the London Plan will require new development proposals to achieve the ‘highest standards’ of fire safety to ensure the best possible protection for all building users should a fire break out.

Applications for all major developments will have to be accompanied by an independent fire statement, produced by a qualified third-party assessor, setting out how the ‘highest standards’ will be achieved appropriate to each specific building or development, from a variety of fire safety solutions and measures available.

While we welcome making fire safety a priority during every part of a building’s life we submit that the London Plan or any other spatial planning document is not the correct route to introduce new legislation on this matter. It is a general principle that planning should not seek to duplicate other regulatory regimes. Regulations and guidance on such an important matter must be simplified, rather than duplicated and the focus of the planning system is on the development and use of land.

The Building Regulations are statutory documents which are separate and distinct from Town Planning. We understand that in light of the tragic Grenfell Tower Fire, MHCLG is reviewing how the building regulations control how buildings are designed or modified on the grounds of public safety and sustainability. It is considered that the findings of this review need to be complete. Otherwise, if spatial documents are to provide policy and guidance this may be inconsistent with other legislation and regulation on this matter.

It is also submitted that London Fire Brigade and Local Authority Building Control departments are not adequately resourced to accommodate the extra work involved in this regard.

Objection: This policy is not effective as it does not properly consider the capacity of expertise within Local Planning Authority Building Control departments and the national shortage of IFE Inspectors on Fire Safety. This is a matter that is best addressed through the Building Regulations. We respectfully request that it should be removed.

User:	London Borough of Camden

Camden supports the Mayor's aims to secure the highest standards of fire safety. We would expect the ability of the planning system to influence aspects of fire safety that are covered by other statutory regimes to be considered by the Panel holding in the examination in public.

User:	Battersea Project Land Company Limited

Policy D11 – Fire safety

We question the need for this policy and suggest that matters such as fire safety should be left to Building Regulations where there is the expertise to assess such matters. The requirement to submit a Fire Statement adds unnecessary cost and burden to the planning application process.

RECOMMENDATION: Delete the requirement to submit a Fire Statement and allow planning applications to summarise their fire strategy within a Design and Access Statement with the detail addressed through Building Regulations as is presently required.

User: Mr Gary Ferrand

P134 – the A list should make reference to identifying the Responsible Person – this is often missed and remains vague. Clarity in this regard will ensure that the RP knows they are responsible and will implement fire safety arrangements. This guide does not make reference to clarifying that responsibility.

P135 – B3 and 4 relate to the same thing. Suggest omitting 4.

Suggest broadening B2 by including a reference to vulnerable persons not just those with disabilities. This should include references to the person centred approach, which would take account of addressing the needs of anyone with any form of vulnerability. The NFCC guidance applies and should be referenced;
https://www.nationalfirechiefs.org.uk/write/MediaUploads/NFCC%20Guidance%20publications/NFCC_Specialised_Housing_Guidance_-_Copy.pdf

3.11.2 states that the subject of fire safety is covered in Part B of the Building Regulations. It doesn't. It refers to the functional requirements as they relate to the design and construction of the building as it relates to fire safety. The subject of fire safety is covered across many different guides, such as BS9999, 9911, fire safety guides, various BRE reports, etc.

3.11.3 here we go, the LFB promotion of fire sprinklers over all other measures. The expertise of LFB and its officers will be compromised if this lobbying is continuously championed above all other measures, such as compartmentation, pressurisation of staircases, multiple staircases, etc.

3.11.5 what does 'suitably qualified' mean? Suggest the document refers to the various 3rd party UKAS schemes which register FR Assessors? The IFE isn't the only register.

User: Home Builders Federation

D11: Fire Safety

The policy is unsound because it conflicts with national policy.

Policy D11 proposes that the London Plan will require new development proposals to achieve the ‘highest standards’ of fire safety to ensure the best possible protection for all building users should a fire break out.

While we understand the desire of the Mayor to make policy in this area, this is a matter for the Building Regulations. It is not a planning matter. The Building Regulations are statutory documents which are separate and distinct from Town Planning. In light of the tragic Grenfell Tower Fire the Government is reviewing how the building regulations control how buildings are to be designed or modified on the public grounds of safety and sustainability. It is considered that the findings of this review need to be complete. There is a danger that the London Plan and London Local Plans may provide policy and guidance in this area this may be inconsistent with other legislation and Regulation on this matter that will emerge, such as that which will follow from the Independent Review of Fire Safety and the Building Regulations by Dame Judith Hackitt.

For example, there is currently a big debate taking place as to whether the MCHLG’s Approved Document Part B is fit for purpose. The Hackitt Review will take a view on this. This means that third party assessors could pass something as being ‘safe’ in terms of the interpretation of the current Approved Document B, but this might be found to be ‘unsafe’ following the published verdict of the Hackitt Review.

The Mayor’s attempt to develop policy in this area also conflicts with the Government’s Written Ministerial Statement of 25 March 2015, which restricts planning authorities from establishing standards that relate to the construction, performance and internal layout of new dwellings.

We highly recommend that this policy is deleted.

Second - albeit this is a very much a subsidiary point - it is unclear what the Mayor might consider the ‘highest standards’ of fire safety to be. He will need to specify this. If this is a matter for the relevant London LPA to judge, based on the production of the Fire Statement, then it would be helpful if the policy stated this.

Policy D12 Agent of Change

User:	Association of Licensed Multiple Retailers

The policy proposal wording states that "Noise-generating **cultural venues** such as theatres, concert halls, pubs and live music venues should be protected (see Policy HC5 Supporting London’s culture and creative industries."

Althought the list does not claim to be exhaustive, there is a conspicuous omission that, for the sake of clarity and recognition of culrutal importance, ought to be corected: nightclubs.

Nightclubs are an economic generator of the night time economy, do generate noise as part of their activities and are a key element of the night time culture of London. Their omission at this stage would lead to ambiguity and or misunderstandings of whether the Agent of Change Principle applies to nightclubs and there is no good reason within the spirit and letter of the policy for them not to be included.

User: Mr Alan Miller

It is absolutely crucial that included in this section is nightclubs. In fact, all licensed premises should be included - as 'bars' are a generic term that some do not consider 'pubs', have later opening hours and have assortment of live and recorded music and contribute to the cultural and economic fabric of our city and borouhgs. Please insert "nightlclubs and all licensed premises" for the avoidance of doubt. Almost 50% of nightclubs have closed in the last 10 years and in London we have had 10 key ones close and several over 1000 capacity leaving an enormous and glaring shortfall to our overal ecosystem. Many thanks, Alan D Miller

User: Mr Peter Eversden MBE

Policy D12 is inadequate in that it seems to cover only noise that existing developments and businesses could cause to those living in new developments and noise problems from the introduction of new uses.

That fails to cover odours from existing uses, vibration from local activities or underground rail lines, light pollution, air pollution and excessive movements of vehicles from existing or new uses that would cause disturbance at times of day or night or congestion on roads. Those potential causes of restriction of development or mitigation should be covered in the policy.

User:	MS J GELLER
excellent idea.	

User:	London Borough of Hammersmith and Fulham

This policy measure is strongly supported as it complements the NPPF and addresses the long-standing issue of existing, well run, noise-generating premises being adversely affected by poorly planned new development or changes of use.

User: Day Group Ltd.

Day Group Ltd operate four aggregate railheads and an aggregate wharf within London, importing in the most sustainable ways possible a significant percentage of the 10 million tonnes of primary aggregate consumed by construction activities in the Capital each year.The use of rail depots to bring construction materials into London saves millions of lorry miles each year with the associated benefits to air quality and road safety.

We are pleased to have the opportunity to comment on the current draft of the London Plan.

Aggregate wharves and rail depots can generate noise and dust. They need the flexibility to be available 24/7 to accommodate ships and trains and are likely to generate significant numbers of short lorry journeys in supplying local construction projects.

Strong national and local planning policies already exist to safeguard wharves and rail depots (referred to in the Plan as railheads) but these are not always implemented effectively by Local Planning Authorities. This can lead to incompatible development close to wharf and rail sites which if poorly designed can generate complaints from residents about noise. This can result in limitations being imposed on the operation of these strategically critical facilities.

There are recent examples in London of this happening.

If wharf and rail depot sites are lost, either through design or ignorance the ability to supply construction materials into London in the most sustainable way will be lost for ever, with the associated damage to London's economy.

The Draft London Plan contains a number of welcome measures to ensure that new development does not result in the reduction of availability or capacity of wharves and rail depots. However it could be stronger in places, more consistent in its guidance and give equally strong protection to rail depots as it already does to wharves.

D12 Agent of Change.

We support this policy, however C3 should include the need to utilise 'site layout, building orientation, uses and materials' in addition to the measures listed, to be consistent with the narrative in 9.15.9 relating to SI 15.

User:	Mrs Sarah Witney
I agree completely with this section	

User: Mrs Hilary Pereira

This is very important for those that are trying to maintain boatyards, which are essential for the ongoing maintenance of the vessels we need to keep the Thames vibrant. Complaints from new housing developments about the noise inevitable in boatyard working risks destroying existing yards.

There is a special issue with safeguarded wharves, and the agent of change principle needs to be extended to these even when in temporary abeyance. Otherwise, the situation can be manipulated by developers to destroy the wharves by squeezing their land access/business, then complaining about the noise when they try to become active again.

User:	SUEZ Recycling and Recovery UK Ltd

SUEZ Recycling and Recovery UK Ltd (SUEZ R&R) supports the introduction of the Agent of Change principle. SUEZ R&R is currently working towards the relocation from 2 sites in London which are situated in close proximity to residential dwellings and are consequently not suitable for modern recycling and resource recovery operations. It is essential that existing facilities are safeguarded from encroachment by sensitive developments which constrain operations.

SUEZ R&R recommends that this policy is referenced specifically within Policy SI9 ‘Safeguarded Waste Sites’.

User: Sport England

Sport England suggests that our guidance: Artificial Grass Pitch (AGP) Acoustics - Planning Implications 2015, is referenced here and is used as a starting point when assessing planning applications which involve Artificial Grass Pitches (AGPs), Multi Use Games Areas (MUGAs) or courts in areas of proximity of residential developments and where new residential developments are proposed adjacent to AGPs and MUGAs.

Artificial grass pitches (AGPs) and Multi Use Games Areas (MUGAs) are a key part of the modern sporting landscape and provide valuable facilities for local communities.

This guidance expands on the general technical advice already available from Sport England. It provides details of acoustic implications associated with such facilities and follows on from an acoustic research programme involving detailed analysis of relevant noise guidance documents and site testing in a range of locations. It proposes appropriate noise criteria and assessment methods and outlines practical measures that can be applied to reduce noise in particularly sensitive areas.

There is no previous guidance or assessment methodology specifically relating to noise from AGPs and this guidance considers the issues from first principles. It offers a simple explanation for those wishing to develop such facilities and provides a more consistent approach for Local Authority noise assessments and limits that might be set for proposals adjacent to sensitive residential areas. It highlights the importance of considering the potential for disturbance to neighbours early in the planning and design stages.

User:	London Forum of Amenity and Civic Societies

Policy D12 London Forum **strongly supports** this innovative policy and are pleased that the Government may now introduce legislation and may include it in the draft revision of the NPPF.

User:	Love Wimbledon BID

Agree that existing entertainment venues should not have to appease new local residents. However placement and location of new residential housing shold be carefully considered as a result. Politicians sit on licensing panels and residents vote, businesses do not vote so the power struggle is always in favour of the residents.

User: London Assembly Green Party Group

Policy D12 is a new policy adopting the agent of change principle, aimed at protecting existing music venues and community facilities when new residential developments are created near them, and at protecting existing residents from noise from new venues.

It is a very positive new policy that takes up the recommendations of the Music Venues Taskforce in their original and updated Rescue Plans and the work of my predecessor Darren Johnson AM since 2014.,

Music Venues Rescue Plan 2015 https://www.london.gov.uk/sites/default/files/londons_grassroots_music_venues_-_rescue_plan_-_october_2015.pdf Updated 2017 https://www.london.gov.uk/sites/default/files/rescue_plan_for_londons_grassroots_music_venues_-_progress_update_-_jan_2017.pdf

Mayor welcomes Darren Johnson AM’s call to protect the capital’s live music venues. London Green Party, Oct 2014 https://london.greenparty.org.uk/news/2014/10/28/mayor-welcomes-darren-johnson-am%E2%80%99s-call-to-protect-the-capital%E2%80%99s-live-music-venues/

User:	MSP Strategies Ltd

I strongly support this. The loss of live music venues and clubs because of stricter licence requirements and new residents is to be deplored.

Clearly the onus should be on the new development to mitigate the impact of existing activity on the new residents.

User: British Retail Consortium

As set out in the plan, protection of industrial space needed for distribution of goods and intensification of industrial space should be encouraged, and also extended to other commercial activities. The draft plan is correct to require boroughs ensure that any intensification does not come at the detriment of the ability of industry to potentially operate 24-hours/7-days a week and that councils should consider what measures can be implemented to protect this. Business uses require access for deliveries, may produce noise and/or smells, therefore, such sites are prone to conflicts with residents in nearby, newly-built buildings.

It is important to ensure the Agent of Change principle is robust so that businesses can operate within proximity to other use classes. We support the principle that development should be designed so that commercial activity remains viable without unreasonable restrictions. It is also reasonable for new commercial premises to take steps such as soundproofing to mitigate impacts on their neighbours, but there should also be an understanding that once those steps have been taken that future complaints be managed reasonably and do not inhibit the operation of commercial sites.

User:	Publica
We strongly support the use of the Agent of Change principle as a tool to ensure that the rich cultural and creative life for which London is so unique and well-known can be sustained in the future. London's role as a cultural and creative city is vital to its future success.	

User: Tate and Lyle Sugars

- We strongly support the principles contained within this policy. It is essential to safeguarding jobs and longstanding businesses, particularly those of an industrial nature. These are often particularly noisy sites that operate 24/7 and therefore prone to conflicts with residents in nearby, newly built buildings. Thorough and proper application of this policy will go a long way to preventing that.

Comments & Suggested Amendments

- It is extremely important this policy is given due prominence by the GLA in current and future discussions with developers as well as any communications activity around the plan – too often similar principles have theoretically applied (e.g. previous London Plan Policy) but are not given due weight in the planning process without extensive representations by the affected industrial business.
- We would suggest adding the following text (in **bold** below) as an additional 1st point to point D12.C
- **Distance from industrial-type activities should be the primary design mitigation principle. It should be the fundamental design measure upon which other mitigations build upon when separating new noise sensitive development from pre-existing businesses**
- We would also suggest the following text (in **bold** below) is added to provide clarity
- **“Agent of Change principles are likely to mean any residential development adjacent to SILs will necessarily be less intensive than elsewhere, in order to allow for appropriate distance and mitigation from industrial activity.”**

User:	Putney Society
Policies D12 – Agent of change & D13 – Noise. Generally supported.	

User: Telegraph Hill Society

D12 & D13 Support but suggest extension

The Agent of Change principle is supported as regards the responsibility for noise, but we would suggest that it could equally as well be applied to all areas of a proposed development such as loss of visual amenity, light pollution etc.

As regards noise, one of the major concerns as regards the sub-division of properties into flats has been the impact of the noise on neighbouring properties: it is almost inevitable in these circumstances that living accommodation of one of the converted properties will be next to a bedroom of an unconverted property next door and this can give rise to high levels of tension between neighbours. The Agent of Change principle should be accepted to apply in these circumstances as much as it does when industrial uses are situated next to residential units.

User:	Rail Freight Group

Policy D12 Agent of Change We support this policy, which should be a valuable tool in ensuring that noise sensitive development does not unreasonably constrain or impact on operation of activities including transport, handling and processing of minerals, including rail depots as well as wharves.

User: Home Builders Federation

The policy is unsound because it is ineffective.

We acknowledge the tension that arises from accommodating London's very great development needs within its existing urban footprint while also safeguarding the amenity of existing residents and the operation of existing businesses. The Agent of Change principle places the onus on new development to mitigate the impact of noise.

The Policy needs to be clear, however, that the applicant is only required to mitigate the effect of noise from existing operational business / industrial / leisure etc uses and not any noise that might emanate from potential future development or changes of use. It would be impossible and therefore unreasonable for the local authority to expect the applicant to assess future potential changes of use that might have a noise impact.

The policy might also list existing noises where it would be unreasonable to expect a developer to sound-proof against; such as church bells, school children, London City Airport, Heathrow flight path, trains, emergency service depots, ice cream vans, etc.

Ultimately, the policy needs to re-drafted so that it can be applied more flexibly by the London boroughs, to take into account the impossibility (and arguably the undesirability) of screening out all sounds, such as those we have listed in the preceding paragraph. To this end, Part B of the policy should be re-worded to read:

"B Boroughs should have regard to the Agent for Change principle when preparing Local Plans and making planning decisions. In preparing Local Plans and making decisions they should take account of…"

User:	Royal Borough of Kensington and Chelsea

3.10 Policy D12 Agent of Change

The Council strongly supports the proposals in Policy D12 as it complements the NPPF and addresses the long-standing issue of existing, well run, noise-generating premises being adversely affected by poorly planned development or changes of use.

User: Freight on Rail

Policy D12 Agent of Change

We support the policy, which should be a valuable tool in ensuring that noise sensitive development does not unreasonably constrain or impact on operation of activities including transport, handling and processing of minerals, including rail depots as well as wharves. Appropriate mitigation must be carried out to limit the adverse impacts on neighbours.

User:	Musicians Union London

The MU is delighted that the Agent of Change principle is being adopted, protecting existing businesses such as live music venues. Developers will have to take into account live music venues and their needs to ensure that any residential development will not be adversely effected, whilst at the same time protecting the existing business. This will, however, only be as effective as its implementation. Established noise generating venues have to remain viable and able to continue and grow without unreasonable restrictions being placed on them. The live music scene is a vital part of London’s economy and the developer paying for soundproofing for the existing noise-generating venues could make a key difference to whether the venue thrives or fails

User: Covent Garden Community Association

This Policy focusses on protecting existing noise generating activities from the impact of new development (usually residential). It needs to be made clear in the Policy wording that this applies also to new noise generating uses. Whilst this is included within 3.12.2 it would be appropriate to include it also within the text of D12. In addition 3.12.2 limits the obligation for the new use is to protect existing noise sensitive uses solely by design. However a developer introducing a noise sensitive use must use design and other mitigation measures.

The other issue is that mitigation measures need to be effective, not just seem as if they might be effective at the time of the application. The Policy needs to have an additional section G as below (or similar).

G Where mitigation measures can be shown to be ineffective or inadequate then boroughs will be free to place restrictions on the new use until the mitigation measures can be shown to have been enhanced so that they are effective.

User: London Borough of Islington

Chapter

Design

Draft London Plan Policy

Policy D12 – Agent of Change

Islington Response

We support the introduction of the Agent of Change principle, which places the responsibility for mitigating the impact of noise firmly on the new development. We would support additional reference to delivery and servicing in Part D, as this can often be a contentious issue.

User: Port of London Authority

The PLA supports the principles underpinning the Agent of Change policy and in particular for placing the responsibility to mitigate impacts from existing noise-generating activities or uses onto the proposed development.

However, policy D12 needs to be specific as to the correct approach to be taken when new noise sensitive development is proposed near to a vacant or under-utilised Safeguarded Wharf or any existing potentially future noise generating development. In these circumstances, to ensure that unreasonable restrictions are not placed on a wharf (for example operating hours, noise levels etc.) it will be necessary for planning applications near to Safeguarded Wharves to have full regard of the Safeguarded Wharf designation and policy SI15 notwithstanding that the wharves may be vacant when the application is made. Planning applications must also assess a reasonable worst case scenario in relation to the use of the wharf into the future. This is already established practice in development control for example; the Leamouth South Development in Tower Hamlets assessed the reactivation of the currently vacant Orchard Wharf and the Enderby Wharf development in the Royal Borough of Greenwich assessed the reactivation of the currently vacant Tunnel Glucose. This established practice in development control needs to be reflected in policy D12 with guidance being provided on possible design solutions in the supporting text (for example fixed shut windows and wintergardens).

The PLA supports part C(3) of policy D12 and part A(5) of policy D13 regarding the utilisation of design layout of new developments as a mechanism for mitigating against the potential adverse impacts of noise generating activities in proximity to new noise sensitive developments. In the PLA's experience with the exception of phases 3, 4 and 5 of Greenwich Millennium Village, planning applications for developments proposed adjacent to Safeguarded Wharves rarely show how design has been utilised to mitigate against potential adverse impacts. Reliance is instead placed solely on sound insulation. Part C(3) of policy D12 and part A(5) of policy D13 must therefore be considered at the outset of new development proposals and be given full weight in decision making.

The PLA recommend the following amendments to part B of policy D12 and to the reasoned justification:

Suggested amendments D12 part B:

"Boroughs should ensure that planning decisions reflect the Agent of Change principle and take account of

existing noise-generating uses ***and land use designations, including Safeguarded Wharves****, in a sensitive manner when new development, particularly residential, is proposed nearby.* ***Where new noise sensitive development is proposed near to a vacant or under-utilised Safeguarded Wharf site, the Agent of Change principle should be taken into account by neighbouring development proposals, to ensure the safeguarded site is not prevented from being fully utilised for its intended use****."*

Suggested amendment to explanatory text at paragraph 3.12.5:

*"Housing and other noise-sensitive development proposed near to an existing noise-generating use should include necessary acoustic design measures****, including the provision of wintergardens and/or fixed shut windows****. This will ensure new development has effective sound insulation to mitigate and minimise potential noise impact or neighbour amenity issues. Mitigation measures should be explored at an early stage in the design process, with necessary and appropriate provisions secured through planning obligations."*

Suggested additional explanatory text after paragraph 3.12.7:

“Where a site is safeguarded for an industrial use, including Safeguarded Wharves and waste sites, the Agent of Change principle applies to adjacent development proposals even if the site is currently vacant or under-utilised. Development proposals near to a vacant or under-utilised safeguarded site should include a noise assessment that assesses a reasonable worst case scenario for the use of the safeguarded site and assumes the safeguarded site is in full operation to its maximum potential.”

User: Theatres Trust

The Trust welcomes this policy, and the positive impact it should have on the protection of cultural venues including theatres. This policy should also provide greater certainty where development is proposed in proximity to existing venues. We also recognise the explicit reference to theatres within supporting paragraph 3.12.4.

We would though highlight that it is important that this policy also recognises that noise and noise complaints directed at venues can also arise through ancillary activities to the venue's main purpose. In the case of theatres (but also music venues amongst others) this includes deliveries; for example, touring productions may have need to load/unload sets and equipment after performances in order to travel on to other locations. Placing restrictions on such activities can also detrimentally impact on viability.

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User:	Association of Consultancy & Engineering

ACE is supportive of the agent of change principle as it encourages community development whilst also preserving the character and purpose of an area. Additionally, where new developments are planned, mitigating noise in these areas through effective planning is a responsible step that allows people to enjoy these venues without having to travel far, as well as being beneficial for the local economy.

User: Brett Group

Policy D12 ‘Agent of Change’ is a key consideration and significant positive introduction into the London Plan. Placing the responsibility for mitigating impacts from existing noise-generating activities or uses on the proposed new noise-sensitive development is welcomed and fully supported. This principle will assist in maintaining the viability of safeguarded sites (rail heads and wharfs) given pressure from incoming residential development.

Consideration, however, should be given in circumstances where a safeguarded wharf or railhead is coming under threat from surrounding development but currently has no extant permission/ use or is currently under utilised. In these cases future operators of the site could be left with an inoperable site if the benchmark for potential noise generating activity is assessed against the current (often under utilised or dormant) land use. In these cases a benchmark level of impact (eg. Noise and dust etc….) should be set out in policy guidance and used to calculate the mitigation required under the agent of change principle.

Alongside the ‘Agent of Change’ approach, there are various mechanisms which could be included within the plan or within Supplementary Planning Guidance to assist further. This would be used predominantly by the London Boroughs when considering applications for planning permission for development which has the potential to be incompatible when located either on or adjacent to existing, planned and potential mineral/ mineral processing, wharf, railhead facilities and supporting uses/ infrastructure.

It is suggested that the guidance could take a generic, traffic light, approach to identifying potentially incompatible development around such railhead, wharf and minerals processing sites, categorizing development as either acceptable with no mitigation (Green), acceptable with some mitigation (Amber) or unacceptable (Red). The guidance would suggest where and what mitigation may need to be incorporated into an adjacent or nearby development in order that it does not constrain or otherwise adversely affect the exiting/ safeguarded land use. For example, red developments would be refused, amber developments being the subject of significant assessment and consented only if sufficient mitigation could be included in the design of the proposed development utilising agent of change principles and green developments being consented with limited or no mitigation necessary to avoid constraining the operation of the mineral facility.

There are several examples where this type of guidance has proven effective in assisting planning officers and other relevant decision makers in considering the appropriateness of a development in a particular setting. For example the Environment Agency published guidance in respect of developments for which an Environmental Permit would be necessary. Such an approach is also commonly used by minerals and waste planning authorities when carrying out site assessments as part of the preparation of minerals and waste development plan documents.

User: UK Music

Smaller grassroots venues are finding it increasingly difficult to operate. In the past ten years the sector has seen a decline of 35 per cent in the total number of grassroots music venues trading in the UK. UK Music's 2017 Wish You Were Here report showed a 13 per cent drop in the level of direct spending at smaller music venues - those with capacity of under 1,500 - in 2016 and a 21 per cent fall in the number of overseas visitors to smaller venues. We are particularly concerned about the picture in London with the amount spent by music tourists at smaller venues in the capital fell by 16 per cent to £65 million in 2016.

8. A growth in demand for property in London has led to a competitive residential market with rising rents and more landlords selling their property and land to developers. This has placed rising financial burdens on pre-existing operators of grassroots music venues, who are often situated in areas that are popular for redevelopment, and made them vulnerable to a more liberalised planning system.

9. UK Music welcomes Policy D12 Agent of Change in the Draft New London Plan. We support the proposal as laid out in the draft Plan that Boroughs must ensure planning decisions reflect the Agent of Change principle and take account of existing noise-generating uses in a sensitive manner when new development, particularly residential, is proposed nearby. We agree with the Plan that development should be designed to ensure that established noise generating venues remain viable and can continue or grow without unreasonable restrictions being placed on them. This will help existing venues to continue to thrive without the threat of having their licences revoked due to noise complaints from new residential developments. The live music scene is a vital part of the night-time economy in London and the developer paying for soundproofing for the existing noise-generating venues could make a key difference to whether the venue thrives or fails.

10. The Government have recently announced that the National Planning Policy Framework, which local authorities are legally bound to comply with, will now be clarified to include detailed reference to the 'Agent of Change' principle. This will be consulted on in spring.

11. We also welcome the further endorsement for Agent of Change in Policy D13 Noise. We support the view that residential and other non-aviation development proposals should manage noise by reflecting the Agent of Change principle to ensure measures do not add unduly to the costs and administrative burdens on existing noise generating uses.

User: Galliard Homes

Galliard supports the principle of Policy D12 – Agent of change. Our experience however suggests that many planning committees don't understand or trust the intention of this Planning Guidance (SPG). Greater work needs to be undertaken with planning committees to enable them to understand the emerging policies intention and how it should be applied.

Policy D12 isn't as clear as it could be. As worded, the policy seeks mitigation against existing neighbouring noise sources / activities, and not emanating from the proposal itself. The policy could offer more flexibility for application by boroughs with very specific and occurring noise sources. We therefore support the HBF's suggested re-wording:

`B Boroughs should have regard to the Agent of Change principle when preparing Local Plans and making planning decisions. In preparing Local Plans and making decisions they should take account of…'

User:	City of London Corporation

Construction logistics plans need to be considered as part of the whole environmental impact for developments and should be specifically mentioned in the (good) design policies especially D12 and D13.

User: Freight Transport Association

Policy D12 Agent of Change page 136

FTA strongly welcomes the inclusion of the ‘Agent of Change’ principle as a sensible and pragmatic approach to the issues which all too often arise from new residential developments being constructed next to existing industrial and logistics sites. This has over the years resulted in many businesses being forced to restrict their activities, relocate or close down altogether (with the associated loss of employment). The onus should be on developers to ensure that new residential developments are designed in such a way that existing businesses and the new residents are protected.

However, the policy focuses on noise and should be expanded to include all potential activities that could cause a statutory nuisance including vibration, traffic, parking and smells.
It is not clear how the policy will be enforced in the long-term and safeguards need to be put in place to ensure that it remains enforceable after the developer has sold the property. For example, if the developer doesn’t do a good enough job with the mitigation measures and a new resident moves in several years later and complains. It needs to consider the eventuality of the developer no longer being in business. The onus of failed noise and nuisance mitigation should not fall on the existing industrial/logistics site operator. The ten-year New House Builder Guarantee could be used as a method of protection. The proposal also needs to protect future uses of the industrial land, such as if the business wishes to expand or diversify. Further detail is needed regarding the timeframe and test criteria for this protection.

User: Thames Water

Where development is being proposed in proximity to (within 800m) a sewage treatment works, the developer or local authority should liaise with Thames Water to consider whether an odour impact assessment is required as part of the promotion of the site and potential planning application submission. The odour impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a sewage treatment works.

Where development is being proposed within 15m of a sewage pumping station, the developer or local authority should liaise with Thames Water to consider whether an odour and / or noise and / or vibration impact assessment is required as part of the promotion of the site and potential planning application submission. Any impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a pumping station.

Paragraph 176 of the NPPF refers to mitigation measures necessary to make developments acceptable in planning terms, noting that “Where safeguards are necessary to make a particular development acceptable in planning terms (such as environmental mitigation or compensation), the development should not be approved if the measures required cannot be secured through appropriate conditions or agreements. The need for such safeguards should be clearly justified through discussions with the applicant, and the options for keeping such costs to a minimum fully explored, so that development is not inhibited unnecessarily.”

The NPPF Paragraph 187 relates to the role of applicants and local planning authorities in working together. “Local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainabledevelopment where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area.”

The odour impact study would establish whether new resident’s amenity will be adversely affected by the sewage works and it would set the evidence to establish an appropriate amenity buffer. On this basis, text similar to the following should be incorporated into the London Plan: “When considering sensitive development, such as residential uses, close to the Sewage Treatment Works, a technical assessment should be undertaken by the developer or by the Borough. The technical assessment should be undertaken in consultation with Thames Water. The technical assessment should confirm that either: (a) there is no adverse amenity impact on future occupiers of the proposed development or; (b) the development can be conditioned and mitigated to ensure that any potential for adverse amenity impact is avoided.”

We welcome Policy D12 ‘Agent of Change’ and propose that the policy should be extended to cover odour and vibration as well as noise.

User:	Tarmac

In addition to the safeguarding of industrial land (policy E4 - Land for Industry, logistics and services to support London’s economic function) and rail freight operations, the important policies D12 (Agent of Change) and D13 (Noise), will ensure ‘noise sensitive’ developments shall not impact or otherwise constrain the operations at wharves, depots and operations.

User: Heathrow Airport Consultative Committee (HACC)

UK Airspace Policy

5. The HACC welcomes the Government's response to the consultation on UK Airspace Policy and in particular:

The call-in powers by the Secretary of State on airspace changes of national importance.

The new metrics to assess noise impacts and their effects on health.

The Independent Commission on Civil Aviation Noise (ICCAN).

Noise

7. The HACC recognizes that all the schemes have the potential for significant negative noise impacts. It is estimated that around 93,000 more people will be affected by noise with a third runway in place compared to a two runway Heathrow – by 2030 some 650,000 will be affected. There should be some alleviation through the introduction of quieter aircraft and the HACC believes this move should be incentivised by Heathrow. It is likely that more annoyance could be caused by the increased number of aircraft using the airport, particularly to people who are newly under a flight path and the Government needs to assess this when coming to a final decision.

User: London Assembly Planning Committee

The London Assembly Regeneration Committee report Creative tensions: Optimising the benefits of culture through regeneration recommended that the Mayor include the Agent of Change principle in the new London Plan. We are therefore pleased that it has been included in Policy D12 in the draft London Plan. Recommendations However, we would like to see provision made in Policy D12 part B for boroughs to consult with local cultural venues on the best approach to managing the sensitivity of new development to noise or other issues.

Policy D12 D should be revised to include the word ‘dust’ as well as established ‘noise generating’ uses.

4.57 The report recommended that local authorities should consult with the list of identified venues before assessing the likely impact of new planning applications on these venues. For example, London Councils refers to art and culture taking place in community venues and wants such informal culture to also be considered during regeneration.[35]

4.58 Without this consultation, it is unclear whether and how boroughs will work with cultural venues to identify the right provision of soundproofing and/or other protections in noise-sensitive development. Such an approach could also miss ancillary or temporary uses, or smaller and informal venues, which may also be noise-generating.

4.59 This policy is linked to Policy HC7 Protecting public houses. This policy should also include provision for consulting with public houses to identify any special mitigation in nearby development proposals.

4.60 The Planning Committee further suggests that Policy D12 D should be revised to include the word ‘dust’ as well as established ‘noise generating’ uses. This would ensure greater protection for established industrial uses particularly as the Draft Plan suggests there should be a move towards co-location of industrial and residential uses.[36]

User:	London Borough of Lambeth
Lambeth supports this policy.	

User:	West End Partnership

The Partnership welcomes the introduction of Policy D12 and the agent for change. The Partnership recognises the challenges that can arise through the effects of development on residential amenity and the importance of the balance which needs to be struck.

User: London Borough of Haringey

The Council strongly supports the inclusion of the Agent of Change policy.

The Council is however concerned about the ability for developments to satisfactorily mitigate noise in relation to policy E7 which seeks to intensify existing industrial estates/mixed uses etc. Even in the event that the proposed new development (being a sensitive receiving environment) may have measures in place, there is concern that this maybe insufficient to provide future users of an industrial park/site confidence to take up a lease/purchase the property. It is considered that agent of change should assume worst case scenario / impact i.e. B2 rather than for example, current B8.

Whilst many buildings are able to incorporate further materials into the built fabric, this can end up having an impact on viability, which leads to potentially fewer contributions such as affordable housing.

User:	London Borough of Hounslow

LB Hounslow supports this policy however this policy should not be limited to noise generating activities only.

User:	London Borough of Barking & Dagenham

The Council supports the introduction of the Agent of Change principal into the London Plan, in addition to the issues listed in the policy, this issue has arisen in Barking and Dagenham with regard to places of worship and the Council supports the onus being placed on the new development to mitigate the impact on neighbouring residents, businesses and community groups.

User:	Environment Agency
We broadly welcome the principle behind this policy.	

User: Environment Agency

We note that it applies explicitly to noise, whilst also noting the policy point C. refers to ‘other potential nuisances’. We presume this reference may seek to encompass nuisances arising from dust, odour, and emissions, but this is not clear or explicit in policy or supporting text. We consider that it should be.

This is an issue, notably for boroughs where there are high targets for new homes, to be co-located with regulated operations, and with industrial and other uses. In such circumstances, there is a prospect of closer proximity between otherwise usually incompatible uses, resulting in harm which cannot be mitigated through careful design. This may compromise the operating conditions of existing regulated sites, and / or have unacceptably adverse impacts upon the quality of life of new residents and occupiers. We can provide examples of such instances as required.

User:	Soho Society

D12 Please add a new subsection G to ensure that mitigation measures must be effective. “G Where mitigation measures which are put in place by developers of noise generating uses can be shown to be ineffective or inadequate then boroughs will be free to place restrictions on the noise generating use until the mitigation measures can be shown to have been enhanced to be effective”.

User:	Environment Agency

Recommendation:

We recommend reviewing the policy, and supporting text so that it provides equal weight to a range of potential nuisances, and makes these clear.

We consider it is also essential to acknowledge in the supporting text, that there will be instances where it will not be possible, despite careful development design, to mitigate harmful impacts. Boroughs will need to assess this on a case by case basis.

User: London Borough of Lewisham

We support the principle of Agent of Change in D12, as we already adopt this approach and use conditions to protect new developments from existing sources of noise.

However, questions have been raised around the requirement at the design stage so that development should be refused if it cannot demonstrate that agent of change has been considered. Questions also exist about implementing D12 as noise control is dealt with by different legislative remit.

Further consideration should be given to:

- The role of Environmental Health.
- Instances where it is not possible to separate new noise sensitive development.
- How resource intensive it can be to implement and enforce conditions relating to noise.
- How the design of the development is crucial in protecting against noise impacts.
- The need for continued monitoring of new sensitive developments and existing noise generating activities.
- How can you design noise generating uses which allows them to grow without restriction?

User: London Borough of Brent

The Council supports this policy in principle but feels that it needs to be proportionate and have some flexibility, taking account of the desirability of maintaining the existing noise generating uses in the area, or the realism of its long term future. This could otherwise place additional burdens on development that are unnecessary.

Amend words to:

A "The Agent of Change principle places the responsibility for mitigating impacts from existing noise-generating activities or uses, ***the continued operation of which are considered desirable to support positive outcomes in relation to other policies in this plan***, on the proposed new noise-sensitive development."

User:	London Borough of Bromley

The policy is welcomed and it is noted that the Council will be able to take this policy into account in some permitted development applications, including conversion of office to residential.

User:	London Councils

The Agent of Change principle should also apply to other nuisances, such as smells and vibration. This is particularly relevant where housing development is granted permission close to waste or sewerage
sites that do emit odour and may also have larger volumes of heavy goods traffic. London’s current waste and sewerage sites may need to expand in the future, given population growth. Neighbouring
development therefore needs to be mindful to these requirements and should not force them out due to heightened and or new local opposition.

User: CBI

CBI members support the principles contained in the Mayor of London's 'Agent of Change' principle (Policy D12). Members have suggested this principle is essential to safeguarding longstanding businesses and jobs, with reference to the industrial sector.

The Agent of Change principle places the responsibility for mitigating impacts from existing noise-generating activities or uses on a proposed new noise-sensitive development. Business have noted industrial sites are often noisy locations, operating twenty-four hours a day, seven days a week. Therefore, such sites are prone to conflicts with residents in nearby, newly-built buildings. The full application of this guidance should help prevent and mitigate such conflicts, and businesses emphasise the importance of this policy being given due prominence by the GLA in current and future discussions with developers. In addition, businesses would like to see the guidance applied to establishments operating in London's night-time economy.

User:	London Borough of Tower Hamlets

We are supportive of this policy and the objective of embedding the agent of change principle into planning policy. It is an approach we have embedded in our own Local Plan.

User:	Royal Borough of Kingston

Support. There is recognition that the planning system and licensing regime will need to work alongside each other in order that the aims of this are achieved. The policy should reiterate that mitigating noise should not be used to reduce the developer’s financial obligations to matters such as affordable housing and other infrastructure necessary to make development acceptable.

User:	London Borough of Waltham Forest

We welcome this policy and support the Agent of Change principle to support the evening and night time economy. However, we note that:

? there is potential conflict between this and policy DM13 Noise,

? Licencing requirement issues, and

? The Agent of Change principle could be undermined by noise outside of venues once people leave for existing residents. Consideration should be given to how this could be mitigated.

The potential issues need to be resolved so this policy can be fully implemented and support the evening and night time economy.

User: London Borough of Hillingdon

The principle of the policy is supported, as it takes a more logical approach to moving the responsibility of mitigating noise impacts onto the new development, when mitigations can be more easily built in or funded. The concern however is that in some scenarios, such as in Conservation Areas or on Listed Buildings, it will not be appropriate to introduce unsightly mitigation measures, such as acoustic fencing.

Furthermore, there needs to be more clarity on the engagement process between new and existing uses, to ensure that existing occupiers are consulted from the beginning and are not forced into making alterations that could negatively impact their viability.

In addition, clarity would also be welcomed on the requirements of new uses being established adjacent to Strategic Industrial Land (SIL), where the current SIL use does not generate any noise.

User:	Westminster City Council

This draft policy essentially repeats national guidance and reflects existing local practice. As such, we question whether it really merits eight paragraphs of supporting text.

User: London Borough of Southwark

The council is supportive of the Agent of Change approach. Further guidance would be helpful to understand the level of technical detail required in Noise Impact Assessments to ensure that the effectiveness of proposed acoustic design can be assessed at the determination stage in conjunction with Environmental Protection Team, to ensure the acoustic design would successfully mitigate noise impacts that would warrant refusal of the application under the agent of change principle.

Guidance on a consistent approach to how physical mitigation would be secured on existing noise-generating uses/sites through planning obligations, and how mitigation can be effectively enforced by planning enforcement if it was not delivered and consequently caused noise issues would also be helpful.

The council would support the Mayor to lobby national government to apply the agent of change policy principles to ‘prior approval’ development.

User:	London Borough of Wandsworth

Placing the onus of noise mitigation on the new noise sensitive development is welcomed and further guidance is sought as to appropriate mitigation measures and how these can be secured through planning agreements if required.

User:	London Borough of Richmond Upon Thames

This accords with the Council’s attempts to ensure that the inclusion of new residential use within mixed use schemes should not adversely impact upon the continued operation of nearby established employment uses. Placing the onus of noise mitigation on the new noise sensitive development is welcomed and further guidance is sought as to appropriate mitigation measures and how these can be secured through planning agreements if required.

User:	Royal Borough of Greenwich

The new Agent of Change Policy D12 is welcomed. This is a necessary and effective means of ensuring that existing noise-generating uses, such as cultural venues and industrial sites, which are fundamental to London’s success, are appropriately protected.

User: London Borough of Harrow

The Council supports the inclusion of the Agent of Change policy.

The Council is however concerned about the ability for developments to satisfactorily mitigate noise in relation to policy E7 which seeks to intensify existing industrial estates/mixed uses etc. Even in the event that the proposed new development (being a sensitive receiving environment) may have measures in place, there is concern that this maybe insufficient to provide future users of an industrial park/site confidence to take up a lease/purchase the property. It is considered that agent of change should assume worst case scenario / impact i.e. B2 rather than for example, current B8.

Whilst many buildings are able to incorporate further materials into the built fabric, this can end up having an impact on viability, which leads to potentially fewer contributions such as affordable housing.

The Agent of Change policy focuses on building measures (layout / materials etc) that can be implemented to address reverse amenity impacts. However, it is difficult to achieve suitable outlook and noise mitigation for outdoor amenity space, which is critical to achieving good quality homes and conflicts with D4 Housing Quality and Standards paragraph 3.4.11.

User: McDonald's Restaurants Ltd

Our business is dynamic and as more of our restaurants in the capital move to 24/7 operations we are minded of the impact this can have on the communities in which we operate.

We always seek to minimise any impacts caused by a move to overnight operations. Often mitigation measures we introduce to operate at night also bring benefits to communities during the daytime as well. For example, plant noise often needs attenuation to operate over night. By introducing this, we are then able to minimise plant noise during the day as well.

While we tentatively support the Agent of Change principle, McDonald’s would be concerned if being labelled an Agent of Change would prompt additional mitigation above and beyond what is already required, as this could act as an obstacle for responsible businesses such as ours to expand and grow.

Furthermore, if Agent of Change has been implemented we believe business should then enjoy a defence against complaints of nuisance. This would require a change to statute and the Environmental Protection Act 1990.

User:	Shaftesbury

This is a new policy introduced into the London Plan however Shaftesbury is already fully familiar with the principles. Camden already has this policy within their adopted Local Plan and draft CPG .

Shaftesbury is already familiar with the increasing acoustic mitigation measures required at the planning stage. Noise Impact Assessment are already prepared for new developments and change of use applications which introduce residential and therefore Shaftesbury understands the need for this policy.

User:	London Borough of Havering

The policy places the responsibility for mitigating impacts from existing noise-generating activities or uses on the proposed new noise-sensitive development rather than the source of the noise. It also recommends that Boroughs should refuse development proposals that have not clearly demonstrated how noise impacts will be mitigated and managed. This approach generally reflects current practice in Havering and is supported.

User:	Royal Borough of Greenwich
Support the Agent of Change principle, which places the responsibility for mitigating impacts from existing noise-generating activities/uses on the proposed new noise-sensitive development.	

User:	Rugby Football Union

The RFU supports Policies D12 ‘Agent of Change and D13 ‘Noise’ whereby policy seeks to protect existing noise-generating cultural venues from adjacent development and land uses brought forward, ensuring the cultural uses can continue in their present form without licencing restrictions or threat of closure from noise complaints.

User:	The Wimbledon Society

D12: There should be proposals to install simple acoustic barriers along principal roads (for example the A3), the noise from which adversely affects a wide area including MOL

User: London Borough of Newham

LBN support this policy and it is considered to be complementary to Newham's Draft Revised Local Plan. It is noted that noise generating uses must still be operating lawfully and within the bounds of 'reasonableness' as per environmental legislation. LBN welcome the Agent of Change referencing both cultural uses and industrial uses to support ongoing viable operations and manage the relationship between differing land uses.

Further details would be helpful as to its implementation however, particularly around where AoC would apply in relation to proximity of existing uses and how the AoC principle would site when change of businesses may occur at a property with different operations falling within the same use class e.g. uses within B2 Use Class may operate at different hours of the day.

Additionally, further implementation guidance is required on how to address the status quo, where there is no legal basis for assessing whether the level of noise generated by existing uses is reasonable; for example businesses may not be undertaking all reasonable steps to minimise their operational noise effects, including through management, maintenance and operational hours, where they have had no historic basis to do so. In effect, this would mean that unreasonable noise levels will add additional mitigation measures and thus unnecessary viability strain and poorer quality of environment for new residential development. It is also unclear to what extent the Agent of Change could be used to protect planned-for land uses rather than actual developments.

User:	HTA Design LLP
The introduction of the Agent of Change principle is encouraging.	

User: Just Space

D12 Agent of change and D13 Noise

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

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

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

User:	London Borough of Bexley

The Council supports the principle set out in **Policy D12 Agent of Change** as a tool to allow noise-producing uses to sit comfortably with residential uses. Ensuring that residential can exist side-by-side with other uses is becoming increasingly important as more residential development takes place in locations with potential noise, including town centres and employment areas. Residents who move into these settings must accept that noise levels will be greater than those found in the suburban hinterlands. Noise mitigation works are not only about soundproofing, but also about management plans to address other potential causes of noise, such as queues of people outside of nightclubs or crowds of people leaving concert venues.

User: Heart of London Business Alliance

Policy D12: Agent of change is strongly welcomed and is a long overdue recognition of the challenges faced by noise-generating businesses. We congratulate the Mayor for bringing forward this policy both through his Culture and Night-time Economy SPG and now in the draft London Plan and his strong support on this issue.

The logic of the Mayor's argument that "development should be designed to ensure that established noise-generating venues remain viable and can continue to grow without unreasonable restrictions" may require stronger actions than simply improved screening and soundproofing. Policy D12 D should include the potential to impose further conditions on new residential or noise-sensitive development to prevent complaints from residents leading to further restrictions, or even the closure of venues. These could be written into leases through a 'deed of easement' or through planning conditions that effectively allow venues to continue operating and growing. We would welcome this being extended to all purchasers or tenants moving next to noise generating venues, however we appreciate this is outside of the scope of planning policy. Stronger guidance on design is welcome, but not sufficient in this case to effectively apply the agent of change principle and protect valuable cultural, leisure, entertainment and music venues.

User:	Federation of Small Businesses

FSB London welcomes the Agent of Change principle; too often successful, popular and established businesses, especially those in the entertainment or creative industries, have been forced to close following complaints from occupants of new developments nearby. We would like to see this apply to other impacts as well as noise, such as smells and vehicle movements. Long term management of this needs to be taken into account including the transfer to new occupiers or if current occupiers wish to expand the existing premises and there should be safeguards in place to secure the usage under the Agent of Change principle.

User: Federation of Small Businesses

It is vital that the Agent of Change principle continues to be applied after the development has been completed and the premises occupied, to ensure the protections intended by the policy are not relaxed once the developer’s interest in the property has ceased.

Contracts for purchase and rent of residential properties must be written in such a way that residential occupiers cannot claim they were unaware of neighbouring commercial activities to lodge complaints that could impose unreasonable restrictions on their neighbour’s business activities.

User:	Federation of Small Businesses
Placing the onus on the developer to understand the local environment and how to mitigate and manage noise impacts is welcome.	

User:	SEGRO

SEGRO supports the notion set out in Draft Policy D12 that the onus is on new housing, and other noise sensitive uses to address issues of noise and amenity where proposed near to existing uses such as industrial units or schemes

User:	Chartered Institute of Architectural Technologists

Policies D7, D8, D9, D10, D12 & D13

We are in agreement with the proposals contained in the plan.

User:	Zbig Blonski

Policy D12 – Agent of change

27.This policy is very strongly supported for the reasons set out in the supporting text associated with it.

User: British Property Federation

We support the Agent of Change principle and are aware that the Planning (Agent of Change) Bill is currently progressing through Parliament at the time of writing. Responsible developers will already be ensuring that disruption from noise into their developments is kept to a minimum and will be putting in place mitigation measures to safeguard against disruption. However, the Bill will ensure that there are no grey areas with regard to developer's obligations and we support a policy that is further clarified through legislation.

In respect of housing proposed to be developed near e.g. music venues, mitigation measures such as soundproofing will form part of that development and developers will work closely with local authorities and the local community to ensure there is consistent consultation throughout the development process to ensure local amenity is maintained. We have no desire to see the closure of theatres and other music or cultural venues and firmly believe that new residential development must co-exist, to maintain a vibrant place where people (new residents and the existing local community) want to live.

User: London Riverside BID

Policy D12 – Agent of Change

We welcome the agent of change principle. This will be fundamental to protecting existing and new industrial and logistics uses in the capital and ensuring their continued use. However, the policy should be strengthened to go beyond wider impacts that just noise and recognise that issues such as traffic, vehicle movements, vibrations, dust and odour will also need to be taken into account. Consideration should be given on how this will be managed in the long term to take into account new industrial occupiers of the same premises or future expansion of the existing premises that may introduce new industrial activity, so that these can be safeguarded against potential complaint.

User: GLA Industrial BIDs Group

Policy D12 – Agent of Change

We welcome the agent of change principle. This will be fundamental to protecting existing and new industrial and logistics uses in the capital and ensuring their continued use. However, the policy should be strengthened to go beyond wider impacts that just noise and recognise that issues such as traffic, vehicle movements, vibrations, dust and odour will also need to be taken into account.

Consideration should be given on how this will be managed in the long term to take into account new industrial occupiers of the same premises or future expansion of the existing premises that may introduce new industrial activity, so that these can be safeguarded against potential complaint.

User: Crest Nicholson PLC

We consider this Policy to be unsound and ineffective as currently drafted and amendments are required.

Whilst Crest Nicholson accept the principles set out here to ensure that co-location of mixed uses do not detrimentally impact on existing businesses, we believe it important that preferably the policy or otherwise the following explanatory text relevant to this policy, makes it clear that when assessing development proposals and establishing appropriate mitigation as envisaged by Part C of this policy, it is only the existing operational business/use that is required to be assessed and not potential changes of use that may be permitted through permitted development or within a particular use class. Furthermore, mitigation arising from intensification of existing use or increase in noise generated from that assessed in connection with the proposed residential development should not be the responsibility of the new residential development, but instead the noise activity user. This should be made clear.

Given the range of uses that potentially may be permitted via permitted development and within use classes, without any further consultation or assessment of impacts, it would be unreasonable to stymie or place a significant mitigation burden on incoming residential development to assess unknown and potential changes of use of existing noise-generating activities. The same is true of intensification or increase in noise output from the existing business. We believe the purpose of the agent for change principles is to provide some form of protection and certainty for existing businesses and their operation. Therefore, should the existing businesses elect to change in the ways we have identified above it is a choice they have made and as such they should bear the burden of the consequences of such changes as regard impacts on neighbouring noise sensitive uses.

User:	313-349 Ilderton Road LLP

Policy D12 Agent of Change sets out that the responsibility for mitigating impacts from existing noise-generating activities or uses on the proposed new noise-sensitive development. Development proposals should manage noise and other potential nuisances.
The general principle of the Agent of Change policy is supported as noise sensitive development can be jeopardised by noise-generating activities. Increased mitigation influenced though he planning system will ultimately lead to intensification of land thus enabling growth.

User:	The Crown Estate

We recognise the need to ensure that appropriate steps are taken to prevent incompatible development in close proximity to aggregate importation and processing wharves. We therefore support Policies D12 and D13 insofar as they should help manage noise sensitive development in relation to importing, processing and distribution of aggregate to and from wharf locations.

User:	London Industrial and Logistics Sounding Board

Policy D12 – Agent of Change
We welcome the agent of change principle. This will be fundamental to protecting existing and new industrial and logistics uses in the capital and ensuring their continued use. However, the policy should be strengthened to go beyond wider impacts that just noise and recognise that issues such as traffic, vehicle movements, vibrations, dust and odour will also need to be taken into account. Consideration should be given on how this will be managed in the long term to take into account new industrial occupiers of the same premises or future expansion of the existing premises that may introduce new industrial activity, so that these can be safeguarded against potential complaint.

User:	Vital OKR

Policy D12 regarding Agent of Change is welcome, but it is important that it be made clear that the principle applies across the range of uses present in London, and is not limited to places of recreation, entertainment and enjoyment. We assume that use of the word venue in section D is a drafting error. The word should be uses or perhaps activities. Paragraphs should make clear that the policy applies to such as industrial, studio, office, education and healthcare, retail, and so on, as well as venues and hospitality uses.

User: Natalya Palit

The agent of change principle in draft Policy D12 suggests that noise generating measures such as schools proposed near to residential development should put in place mitigation measures. Careful consideration should be given to the implications of this. As part of the plan's health agenda it is important to ensure that schools can provide open spaces for children. Policy D12E as it stands would encourage enclosed play areas, to enable sound insulation to be put in place. This would reduce many of the mental health effects of being connected to outdoor space.

User:	North London Waste Plan
In D12 support introduction of agent of change principle which recognises impacts on existing business due to sensitive receptors being developed in close proximity.	

User:	London Borough of Sutton

OBSERVATION. The London Borough of Sutton broadly supports the approach to noise. Given that Policy D12 Agent of Change principally relates to noise, the council considers that there is scope to amalgamate policies D12 and D13 and streamline to avoid repetition of national policy and guidance. The council considers that clarification should be provided regarding ‘Tranquil Areas’ which are referred to at paragraph 3.13.6 but are not addressed within the policy.

User:	Elephant & Castle Properties Co Limited

Policy D12 – Agent of Change. The overarching principles of this policy are supported, however the accompanying text should be elaborated upon and made clear that to further reduce potential conflict, existing noise-generating uses should operate sensitively, and in accordance with their respective licencing obligations.

User: Heathrow Airport

We support the proposed policy which places the responsibility for mitigating impacts from existing noise-generating activities or uses on the proposed new noise-sensitive development. This is a fair and pragmatic approach that we would strongly support in the context of new noise-sensitive development in the vicinity of Heathrow where noise from aircraft both in the air and on the ground is particularly prevalent. This is consistent with the International Civil Aviation Organisation (ICAO) ‘Balanced Approach’ in terms of how land use planning can be used to appropriately mitigate against noise.

It is important the new noise-sensitive development likely to be affected by relevant levels of aircraft noise is constructed and insulated to appropriate standards prior to occupation. Boroughs should reflect this approach in their local plans.

User:	Central Bedfordshire

Minerals and Waste

• We welcome and strongly support the overall strategy for minerals and waste, in particular:
• The provision for safeguarding aggregate wharves and railheads (PoliciesT7, SI10 and SI15);
• The emphasis on recycled aggregates, whilst at the same time seeking to maintain aggregate landbanks (Policy SI10);
• The safeguarding of aggregate resources (Policy SI10)
• The reduction and minimisation of waste, aiming at a circular economy (Policy S17);
• Waste self-sufficiency by 2026 (Policy SI8);
• The safeguarding of waste management sites (Policy SI9);
• The ‘Agent of Change’ principle (Policy D12) which will assist in safeguarding existing mineral and waste sites.

User: DTZ Investors

Policy H5: Delivering affordable housing & Policy H6: Threshold approach to applications

It is accepted that affordable housing from residential and mixed-use developments should generally be sought on-site [as long as the mixed use development includes residential provision that triggers an affordable housing requirement in itself]. However, the requirement of part B of draft Policy H5 that affordable housing should be delivered on-site does not acknowledge that it is not always practicable or viable to secure mixed tenure housing provision within mixed use schemes on constrained sites, particularly in central London.

The policy also does not recognise that development proposals in central London can often secure more and better quality affordable housing through off-site provision, through development in the vicinity of the application site, or elsewhere if funded by a contribution in lieu of provision. As off-site delivery of affordable housing is relatively common in central London, it is considered too inflexible for Policy H5 to allow off-site provision or a contribution in lieu of provision only in exceptional circumstances.

In seeking to deliver affordable housing under draft Policy H5, serious concern is also expressed that the accompanying draft policy H6 sets a threshold level for affordable housing provision at 50% for Strategic Industrial Locations (SILs), Locally Significant Industrial Sites (LSIS) and other industrial sites deemed appropriate to release for other uses, in order to benefit from the Mayor's Fast Track Route (whereby applications for major residential developments are not be required to submit viability assessments for review).

Policy E7 of the draft London Plan, advises Development Plans and planning frameworks should consider "whether certain logistics, industrial and related functions" in selected parts of SILs and LSIS "could be intensified and/or co-located with residential and other uses, such as social infrastructure, or to contribute to town centre renewal." However, critical to this approach is the requirement of Part E of the policy for "an increase (or at least no overall net loss) of capacity in terms of industrial, storage and warehousing floorspace with appropriate provision of yard space for servicing."

The requirement for redevelopment schemes within SIL or LSIS to retain or increase industrial, storage and warehousing floorspace and provide service yards, presents a significant constraint for redevelopment of these sites, with the need for careful design to accommodate these employment uses alongside residential development and the need for yard areas inevitably reducing the level of market housing that can be delivered on site, with a significant impact on viability for redevelopment. Additionally, active and passive extensive noise mitigation measures for SIL and LSIS site will be required to ensure industrial activities are not compromised by residential development in accordance with to the 'Agent of Change Principle' to be followed under draft Policy D12.

Coupled with the likelihood that housing on sites alongside industrial uses is also likely to secure lower revenues for developers than in established residential areas, the effect of these measures will inevitably make redevelopment of these sites more challenging and squeeze the viability of redevelopment schemes, which could compromise the development of emerging new communities and the regeneration of areas (in particular Opportunity Areas with substantial levels of protected industrial land).

The basis for setting of a 50% affordable housing requirement for proposals on Strategic Industrial Locations, Locally Significant Industrial Sites and other industrial sites to benefit from the Fast Track route (without the need for a viability assessment) instead of the 35% for development of all land not in public ownership will be likely to mean that all major schemes for redevelopment of these sites are likely to require viability appraisals to demonstrate how this level of affordable housing provision cannot be achieved. This requirement is likely to significantly to slow up the determination of planning applications (and add significant costs) and in turn delay the delivery of new housing and employment. The effect of this approach will be particularly felt in Opportunity Areas, which are expected to contribute to the delivery of circa 87% of the total housing in London over the next 10 years. (568,000 of 650,000 units) and thus the proposed policy could compromise achieving the Mayor's ambitious proposed housing targets.

Change Sought – It is requested that draft Policy H5 provide greater flexibility by explicitly recognising that within inner London off-site affordable housing provision may be considered acceptable where it can be demonstrated that this would lead to an improvement to the quantity or quality of affordable housing provision compared to that which might be practically and viably achieved on-site. Recognition should also be made to a payment in lieu of provision being deemed acceptable where either on-site or off-site provision is not practicable or viable.

It is also requested that Part (B)3 of draft Policy H6 be deleted to remove reference to a threshold level of affordable housing for residential development of Strategic Industrial Locations, Locally Significant Industrial Sites and other industrial sites being set at 50% in order to benefit from the Mayors Fast Track Route, in favour of applying the 35% threshold to all land not in public sector ownership.

User:	London Borough of Ealing

The Council supports the agent of change principle as a rational measure for managing the change brought about by development and acknowledges the benefits this may afford in protecting cultural venues such as theatres, pubs and live music venues.

User: Ballymore Group

Policy D12 of the draft new London Plan seeks to incorporate the Agent of Change principle set out within paragraph 123 of the National Planning Policy Framework. This paragraph states that existing businesses should not have unreasonable restrictions placed on them because of changes in nearby land uses. Policy D12 seeks to reinforce this principle by placing the responsibility for mitigating impacts from existing noise-generating activities or uses on the proposed new noise-sensitive development.

Ballymore has extensive experience throughout London of bringing forward residential-led mixed use schemes in close proximity to existing noise-generating industrial activities. They are therefore well placed to comment on the practical implementation of this policy.

Our client recognises the importance of ensuring that existing and proposed uses can live in harmony and has no in-principle objection to the requirement for development proposals to mitigate and minimise existing and potential impacts of noise generated by existing uses located in the area as required with Policy D12. However, it should be acknowledged that many of the Opportunity Areas identified for strategic housing within the draft new London Plan encapsulate land that has historically been used for industrial purposes and will continue to have operating industrial functions both within and adjacent. In the interests of ensuring effective delivery of strategic housing it is therefore important to carefully consider the wording within Policy D12 so that it does not become an unduly restrictive policy.

Neither the 'Noise Policy Statement for England – March 2010' nor the National Planning Policy Framework expect noise to be considered in isolation, separately from the economic, social and other environmental dimensions of proposed development. Policy D12 should therefore incorporate a degree of flexibility to ensure that new developments are not subject to excessive requirements that may ultimately jeopardise their deliverability or the standard of accommodation as acknowledged by Part a (3) of Policy D13 (Noise).

Paragraph 2.24 of the 'Noise Policy Statement for England – March 2010' is consistent with the objectives of Policy D12 in so far as it requires that all reasonable steps should be taken in new developments to mitigate and minimise adverse effects on health and quality of life. However, it also states that *"This does not mean that such adverse effects cannot occur."* There will undoubtedly be occasions where, despite the best efforts of the developer, it is not possible to satisfy to all parties that no impact will occur.

It is therefore considered that a degree of flexibility should be introduced into the wording of Policy D12 that would require developers to demonstrate to the local planning authority and the GLA that ‘all reasonable endeavours’ have been taken to ensure that proposed new noise-sensitive development mitigates impacts from existing noise-generating activities or uses. Where appropriate, this will allow for a more pragmatic and balanced judgement to be made in respect of all relevant economic, social and environmental considerations.

Further to the above, Paragraph 3.12.2 of the justification text for Policy D12 states that the Agent of Change Principle places the responsibility for mitigating the impact of noise firmly on the new development. However, it is our client’s view that Policy D12 should also account, and make provision, for instances where an agreement could be reached between the developer of new noise-sensitive uses and the owner of the established noise-generating uses on the issue of mitigation. For example, a developer may have the opportunity or ability to assist in the upgrade or improvement of existing facilities so that the level of noise-generation is reduced or mitigated. This in turn would reduce the requirement for mitigation within the new development, a potentially major consideration for a residential developer whose sales values and build costs might be substantially affected by the extent of noise mitigation internally within the scheme.

User:	Ballymore Group
Sites to deliver a significant percentage of the housing targets. Furthermore, there is a concern that the Agent of Change Principle could be interpreted too inflexibly by local authorities to the extent that it may unnecessarily inhibit regeneration.	

User: DPDgroup UK Ltd

Policy D12 - Agent of Change

DPD is very supportive of the agent of change principle and has numerous examples available where, due to planning decisions, a new final mile depot has been constructed and subsequent residential development has led to difficult to handle and potentially reputational damaging complaints.

A holistic approach to planning needs to be adopted. Rather than assessing applications as individual entities the interrelationship between occupiers and residents has to be assessed.

The agent of change principle also needs to be extended to cover light pollution and vehicle movements and vibrations rather than just noise.

User:	Hornsey & Wood Green Labour Party

We propose this policy needs greater explanation in particular to noise-generating uses in residential settings.

User: Aggregate Industries UK Ltd

Draft Policy D12, Agent of Change and Supporting Text

The introduction of the 'Agent of Change' principle is welcomed and makes a good start in recognising and addressing issues which operators on both wharf, rail and other industrial sites within London have been grappling with in the context of safeguarding their existing and future operations from encroaching noise sensitive development.

We concur with the PLA's stance, as set out within their representations, that the policy should be more specific regarding the correct approach that boroughs should take when determining planning applications for new noise-sensitive development near operational safeguarded wharves or vacant or under-utilised safeguarded wharves. This same approach must also be applied to railheads and to other industrial locations accommodating mineral plant. This is particularly to ensure that there is no inconsistency with the NPPF requirement to safeguarded existing, planned and potential sites and uses in respect both of wharves and rail sites and as reflected in draft policies SI15 and SI10. In addition to ensure there is no inconsistency with draft policy E5, Strategic Industrial Locations, which similarly requires boroughs in their development plans to develop local policies to protect and intensify the function of SILs and the requirement that development proposals within or adjacent SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial type activities and their ability to operate on a 24 hour basis.

From the operator perspective, and their experience in seeking to defend their sites and operations within London, it is key that mitigation measures within new development around safeguarded sites are robustly considered at an early stage, and that local planning authorities are satisfied with these measures before planning permission is granted. This is to avoid mitigation being considered as an afterthought at conditions stage. It is also critical that regard be had to the fact that the operation of the site could be expanded or intensified as encouraged by Policies SI15, SI10 and E5.

On this basis the follow amendments to Policy D12 are proposed:

B. Boroughs should ensure that planning decisions reflect the Agent of Change principle and take account of existing noise-generating uses and land use designations, including safeguarded wharves, railheads and SIL and their potential for expansion and intensification, in a sensitive manner when new development, particularly residential, is proposed nearby. Where new noise sensitive development is proposed near to a vacant or under-utilised safeguarded wharf, railhead or SIL designated site, the Agent of Change principle should be taken into account by neighbouring development proposals to ensure the safeguarded site is not prevented from being fully utilised for its intended use.

Paragraph 3.12.7:

Noise impact assessments accompanying planning applications should be carefully tailored to local circumstances and be fit for purpose. That way, the noise characteristics of existing uses can be properly captured and assessed. For example, cultural venues can have peaks of noise at different times of the day and night and on different days of the week, and many SIL areas and industrial activities at safeguarded wharves and railheads operate on a 24 hours a day, 7 days a week basis. ~~and~~ Boroughs should require a noise impact assessment to take this into full consideration. Such assessment should be progressed in full consultation with the operator of the noise generating site and should be evidence in the planning application submission. Boroughs should pay close attention to the assumptions made and methods used in noise impact assessments to ensure a full and accurate assessment".

A new paragraph should be inserted following paragraph 3.12.17:

Where a site is safeguarded for an industrial use, including Safeguarded Wharves, railheads and waste sites, the Agent of Change principle applies to adjacent development proposals even if the site is currently vacant or under-utilised. Development proposals near to a vacant or under-utilised safeguarded site should include a noise assessment that assesses a reasonable worst case scenario for the use of the safeguarded site and assumes the safeguarded site is in full operation to its maximum potential.

User: Cemex UK Ltd

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User: London City Airport

Policy D12 is a new policy which seeks to establish a principle which places the responsibility for mitigating impacts from existing noise-generating activities or uses on the proposed new noise-sensitive development. In particular, part D of the policy requires development to be designed to ensure that established noisegenerating venues remain viable and can continue or grow without unreasonable restrictions being placed on them.

London City Airport supports the principle of the new policy and its approach. The Airport has been a catalyst for the regeneration of the Royal Docks. Housing and employment uses have been successfully delivered in the Royal Docks close to the Airport and it is important that new housing includes appropriate built-in noise mitigation to respond to its surroundings. The Airport has a well-developed noise mitigation strategy which was carefully scrutinised during the determination of its CADP1 planning permission, which showed that new, and indeed existing, properties are fully capable of being successfully insulated from aircraft noise.

For clarity the, the Airport recommends that the policy provides further clarity over ‘noise generating uses’ and makes it clear that this applies to a wide range of transport infrastructure. The following additional text should be incorporated within the policy as shown in bold and underline:

“A. The Agent of change principle places the responsibility of mitigating impacts fromexisting noise generating uses activities or uses, **including existing and proposed transport infrastructure**, in the proposed new noise-sensitive development”

User: Sainsburys Supermarkets Ltd

Sainsbury’s offers its full and unequivocal support for the principle outlined within this policy. However, we note that the policy focuses on existing noise-generating cultural venues. We consider that this policy and its supporting text should equally and specifically recognise retail uses as requiring the same level of protection.

Sainsbury’s have experienced complaints (particularly linked to servicing) when noise sensitive uses are introduced around existing stores and these uses do not contain sufficient noise mitigation. Our approach to the management of deliveries and servicing is highly effective in reducing impact, but it is inevitable that there will be an element of noise and disturbance associated with some activities. In the past, the onus has fallen unfairly on us to mitigate noise issues or forced us to severely compromise our existing arrangements. This can have a significant impact on the operation of the store and in turn our ability to meet our customers’ expectations.

The DLP must be clear that the Agent of Change Principle applies to retailers.

User: UKWA

UKWA welcomes the Agent of Change principle and sees it as fundamental to protecting existing and new logistics and warehousing uses in the capital and ensuring the continued existence. We would like to see this apply to other impacts as well as noise, such as smells and vehicle movements. Long term management of this needs to be taken into account including the transfer to new occupiers or if current occupiers wish to expand the existing premises or new usages and there should be safeguards in place to secure these activities to safeguard against potential complaints and actions.

User:	UKWA
UKWA welcomes this. We would like to see this apply to other impacts as well as noise, such as smells and vehicle movements.	

User:	Cross River Partnership
We support this policy as an important protection for existing night time economy venues.	

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User:	Oneill Homer
D12 Neighbourhood plans can identify valued but noise-generating businesses or activities to benefit from the ‘agent of change’ principle based on local knowledge and opinion on the relative value of the business.	

User:	Unknown

Our client supports the Agent of Change principle and our client is a responsible developer that already ensures that disruption from noise from their developments is kept to a minimum, ensuring that their site has been designed in accordance with the agent of change principle. Our client has been developing next to the SSE Wembley Arena and Wembley Stadium for the past 15 years and through close working relationships with both institutions, they have been able to meet residents' expectations without impacting upon the operations of these iconic venues.

User: Tarmac

Within London Tarmac operates a portfolio of wharves and railheads that help deliver building materials - aggregates, recycled aggregates, ready mixed concrete, cement and asphalt to meet the capital's construction and building programme. Each train, ship and barge that Tarmac has access to assists greatly in transporting bulky materials around the capital in the most sustainable way. Some of our wharf sites are also rail linked such that aggregates that are imported by sea faring ships to the wharf site are then able to be further transported by rail to a network of rail linked depots across the capital.

To maintain such an important and connected logistical supply chain requires investment and certainty around depot availability. Notwithstanding this, Tarmac is investing in additional barge loading facilities that will enable further haulage of materials 'intraport' by river in between certain existing wharves. Maintaining Tarmac's portfolio of wharves, rail sidings and depots is essential to ensuring these materials can be sustainably delivered without adding additional road going vehicles to the capital's already congested network.

As with the majority of wharf locations along the Thames, our sea faring vessels are tidal dependant on gaining access and unloading cargoes irrespective of the time of day. In a similar way many of our rail heads operate at night to avoid the passenger traffic peak times during the day. Road transport will continue to be necessary as building projects do not all have immediate access to an adjoining rail siding or wharf for example.

Tarmac is naturally supportive of growth, investment in infrastructure, construction and housing across the capital generally and is a customer focus business ensuring that the required building materials are supplied in a timely manner, to the right quality and without unnecessary wastage.

Despite planning policy within the current London Plan recognising the importance that wharves, barge loading locations and rail heads have in removing road going traffic from the capital's congested network, we are finding that an unfair priority is being given to the residential building sector to the potential detriment of such facilities. Planning decisions are being made that result in residential developments occurring in close proximity to these facilities without appropriate design considerations or standoffs to them. For example, the consequences of noise complaints arising from residents occupying a new high rise river fronting dwelling alongside an existing wharf operating 24/7 is very real to us. The impact of restrictions being placed on an existing 24/7 wharf or railhead could result in additional road transport to meet demand and goes against the grain of sustainable transport and maximising the use of the River/Rail. Additional policy protection is therefore required to level the playing field to ensure due consideration is given to such important locations.

Tarmac fully supports policy Policy D12 – Agent of Change in relation to the above. Clarity is required however to what 'existing noise generating activities' means, and wharf sites and railheads and associated ancillary facilities should be expressly referred to. As such the sub text in para 3.12.4 should clarify that....

In terms of the aggregates sector, existing noise generating activities will include safeguarded wharves, railheads and any associated cargo unloading or loading operations and any on site ancillary facilities. They will also include quarrying activity, concrete batching plant sites, asphalt plant sites and recycled aggregate processing sites. The worst case scenario in terms of noise assessments will assume that all operations at a particular location are operating simultaneously.

User: UK Power Networks

Noise Reduction

We are supportive of your strategy to address ambient noise taking the issue of how it may affect the health and wellbeing of communities very seriously. We therefore support the Agent of Change principle outlined in Policy D12, this takes the National Planning Policy Framework Section 123 and provides clarity in London that the mitigation costs need to be met by the developer.

User:	London Borough of Camden
The Council supports the application of the agent of change principle.	

User:	East of England Aggregates Working Party

EEAWP also notes **policy D12** (Agent of Change) which together with **policy D13** (Noise) places the responsibility for mitigating impacts for existing noise generating activities or uses on the proposed new noise-sensitive development. The inclusion of these policies is supported as it is considered that it will add further weight in the retention of wharves and railheads and aggregate recycling facilities in the capital in areas where there is also a demand/need for noise sensitive development such as housing and associated development.

Policy D13 Noise

User:	London Parks and Gardens Trust

Comment 3.13.6
Why does the Mayor delegate the definition of Tranquil Areas to Local Authorities? The Trust believes these should be designated by the London Plan in accordance with the rest of the spatial planning maps provided and would urge that the land identified by DEFRA should be designated for protection now. The Trust notes that the Heathrow Expansion public consultation is currently underway and believes that designation of these spaces by the Mayor would have a significant influence on the chosen flight paths and the impacts on biodiversity.

User:	Cross River Partnership

This section could have more commitment to addressing noise generated by freight and other traffic. There is significant potential for this to be minimised by increasing cycling and walking for individual journeys; as well as facilitating cycle couriers; freight portering schemes and increased uptake of electric vehicles.

User:	Public Health England

There is unequal access to green space across England with people living in the most deprived areas being less likely to live near green spacesxviii and ambitions on reducing inequalities and improving health outcomes for the most deprived should be considered in delivery of Policies G1, G4 and D13 Part B on green infrastructure and local green, open and quiet space.

User:	Public Health England

Noise
? Policy D13 is welcomed to improve and enhance the acoustic environment by reducing noise and promoting good acoustic design and appropriate soundscapes. Long term noise exposure affects health, wellbeing, productivity and the natural environment, and has a significant social costxxi

? We welcome the requirement (in part B) to identify and protect Quiet Areas in parts of Metropolitan Open Land and local green spaces as access to quiet and tranquil spaces has a positive impact on mental health and wellbeing.

User: Socialist Health Association London

Policy D13 Noise

NOISE pollution can have a significant effect on mental health – this needs to be:

Monitored

Complaints acted upon

New developments which may increase noise pollution need to be either discouraged or properly managed. The major example is the proposed new Heathrow runway which if developed will significantly increase both air pollution and noise pollution in West London, beyond any reasonable saturation point. If realised, this will have a detrimental impact on the people of West London.

RECYCLING – this is a health and environmental issue.

All local authorities need to follow best practice guidelines and households given more help in identifying how to follow this – including disposal of larger items or items such as old saucepans/clothes to prevent them being wrongly included in with other materials or fly tipped.

More help should be offered to the disabled to engage in recycling and safer refuse disposal.

Local authorities who cut costs and leave large amounts of refuse on pavements eg Kensington & Chelsea should be penalised

User: UK Power Networks

We support your vision to transform London into a greener and more pleasant city for its population. We recognise that air pollution is an important issue in London and that it is imperative that measures are implemented to rapidly reduce nitrogen oxides and particulate matter emissions that are harmful to human health. The aims in the London Plan provide sensible steps to achieving improved accessibility to cleaner public transport and we will endeavour to support in enabling these through our work promoting and facilitating the decarbonisation of transport highlighted in the above section.

Delivering Clean, Smart, Flexible Power

The nation's journey to a low carbon economy is revolutionising the way we produce, distribute and consume electricity. We have experienced these changes first hand and we have seen how our customers, motivated by efficiencies, new technologies, and government policies, can drive radical changes such as the sudden and widespread connection of renewable generation to our networks.

Over the past three years, the UK has seen the connection of 12GW of solar generation and 16GW of wind capacity – sufficient to exceed consumer demand at certain times in summer. The distribution networks are at the forefront of enabling these changes; 90% of the solar energy alone connects directly to the local distribution networks. Renewable energy installations, such as wind and solar farms, are on the rise and we are proud to have enabled 9GW of distributed generation to connect to our networks; a third of the UK total and around three times the capacity of Hinkley Point C power station.

The pace and scale of these changes in our industry is increasing. In the last two years, large-scale storage has emerged with advancements in electricity storage technology. To date we have over 61MW of storage connected to our networks with a further 1.3GW of storage with quotations accepted and storage enquiries for a total of 24GW. At the same time, we are starting to see the pickup of EVs and the national roll out of smart meters. The electricity system needs to enable these technologies and to do this it has to change.

To continue to support the low carbon transition in a safe and cost-effective way our role will continue to evolve. Instead of acting as the passive manager of a network of cables and assets connecting centralised generators to homes and businesses, we are transitioning to become an active manager of a system that enables local communities, renewable generation, small and medium sized businesses, prosumers and consumers to access the energy and flexibility markets, all whilst making sure the lights stay on. This transition from a passive network manager to one providing active, market-focused services for our customers requires a transformation of our business to meet the requirements of this new role; that of a DSO.

User: UK Power Networks

Flexible Distributed Generation

Flexible Distributed Generation (FDG) connections allows distributed generation (DG), (e.g. solar and wind) with a cheaper and quicker point of connection to the existing network without the need for/or ahead of reinforcement. Previously, if a DG connection required network reinforcement, the cost of this reinforcement would have to be met by the generator owner, providing a substantial barrier to many DG projects getting off the ground. The FDG connection offering was developed as part of our research demonstration project, Flexible Plug and Play (FPP20), to facilitate the connection of DG in areas of network congestion without the need for the customer to pay high connection costs. This connection is in return for the ability for us to control their output in times of high network load.

The FDG connection is enabled by the Active Network Management system (ANM), a software automation product that monitors the network in real-time and automatically controls the output of participating generators. The ANM is designed to ensure safety of the public, our employees and the network infrastructure and as such it delivers fail-safe instructions if it detects abnormal operation of any of overall system components including the generators. As a result of the FDG schemes there are currently 23 generators operational, having saved over £70m in connection costs. Without FDG these projects that would not otherwise have been developed and further demonstrates how we are an enabler to clean, smart and flexible power.

Flexibility Tenders

We are actively seeking to contract with flexible energy resources to support delivery of cost-effective investment and smart management of the distribution network. Whereas FDG (mentioned above) is flexibility via the connection agreement, this solution refers to flexibility deployed through a bilateral contract between us and distributed energy resources such as generation, DSR, and storage.

The flexible capacity such contracts provide will be used to manage uncertainty over when network investment is required as well as supporting network operations. The locations with potential for deployment of flexibility was published to industry in August 2017 and a competitive tender published in October 2017 to procure flexibility services over the next couple of winters.

The new flexibility services contracts are expected to have three key benefits:
? A new way for electricity generators, storage, major consumption users and aggregators to offer their resources to create additional income;
? More efficient use of the existing network infrastructure and connected resources will mean lower electricity distribution costs for customers; and
? Help ensure an even more resilient electricity supply.

We believe this strategy will be key to playing our role in facilitating the £17-40bn of wider system benefits which Ofgem and BEIS cite as attainable through smarter, more flexible use of the energy system.21

Our innovative projects, transitioning to business as usual smart grid solutions and the resulting connection of renewables has helped reduce the carbon factor for electricity in the UK. This, as reported in the ‘UK Government GHG Conversion Factors for Company Reporting22’ has gone from 0.46219kg CO2e per kWh in 2015 to 0.35156kg CO2e per kWh in August 2017, a 24% reduction. This reduction in Business Carbon Footprint is a benefit passed to everybody.

User: UK Power Networks

Noise Reduction

We are supportive of your strategy to address ambient noise taking the issue of how it may affect the health and wellbeing of communities very seriously. We therefore support the Agent of Change principle outlined in Policy D12, this takes the National Planning Policy Framework Section 123 and provides clarity in London that the mitigation costs need to be met by the developer.

Noise is considered in the design phase of all of our new projects with mitigation and reduction measures incorporated into the design where required. To illustrate our efforts to minimise the effects of noise, since 2015, we have specified the use of low loss transformers, which are typically 3-5dB quieter than conventional transformers in an effort to reduce the impact our equipment may have. Additionally, we have made a commitment to our regulator (Ofgem) that we will investigate all noise issues and address any sites requiring attention.

We lead the way in the industry in implementing new low frequency noise reduction technology and have recently been working with Sonobex23, installing a new noise reduction screen at our Moscow Road site in London. This is the first installation of a barrier of this type in the UK and it has successfully decreased the ambient noise level to residents and visitors to that area of the capital. We will look to roll out this type of screen to more of our sites in urban areas where appropriate.

We are currently looking at how best to proactively engage with local authorities to ensure local development core strategies consider the presence of our equipment. An example of this approach can be shown with our Environment Team actively engaging with Local Environmental Health Officer forums to raise awareness of noise and other potential issues associated with operation of the electricity distribution network. This has been met with positive responses and is something we are keen to develop. We believe there are opportunities to improve information sharing with developers, and are therefore reviewing the feasibility of producing noise maps for our larger sites to identify potential issues at an earlier stage. This way, the impacts on occupants of new residential and commercial developments and other stakeholders can be mitigated, and expensive retrofits which ultimately feed through to Londoners’ electricity bills can be avoided or minimised.

To help us achieve this, we would welcome the opportunity to work with your office and local boroughs, to identify what other avenues could be explored to raise awareness amongst planners of the implications of siting new developments next to our substations and to identify specific actions to mitigate this.

Finally, we note your reference to BS8223:2014 in respect of providing guidance on good acoustic design inside buildings. Whilst this is a widely used standard it is not always appropriate for low frequency noise associated with electricity transformer hum. When buildings are in close proximity to our substations consideration should also be given to:
? Room dimensions to ensure standing waves are not created;
? Windows having a dip in acoustic performance at the 200Hz noise frequency. This frequency is often associated with the second harmonic produced by transformers;
? Considering the use of noise reduction curves within the planning conditions – the NR20 would be the appropriate curve to use. However, a robust process would need to be put in place to ensure that planning conditions are achieved post construction.

User: Mr Joe Ward

The policy on noise should make explicit reference to the need to reduce the impacts of noise on green space and the wider public realm, and other relevant policies amended accordingly.

Proposed change:

Policy D7 should be strengthened by adding a new sub-section after A) stating Development Plans and development proposals should: **Take account of the need to protect and enhance the relative tranquillity of the public realm, particularly parks and green spaces and quiet walking and cycling routes.**

Additions should also be made to Policy D13 Noise as follows:

Para B: Boroughs [etc] should identify and nominate new Quiet Areas and protect existing Quiet Areas in line with the procedure in Defra's Noise Action Plan for Agglomerations **and ensure local green space is improved in line with Policy G4 (as amended) including by:**

· **taking action to reduce traffic noise around parks which are severely impacted by traffic noise and pollution, using such measures as temporary/weekend street closures and/or permanent re-routing of traffic; or introducing natural or man-made noise barriers.**

User: Hornsey & Wood Green Labour Party

The policy on noise should make explicit reference to the need to reduce the impacts of noise on green space, and other relevant policies amended accordingly. Proposed change: Additions should be made to Policy D13 Noise as follows:

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1. taking action to reduce traffic noise around parks which are severely impacted by traffic noise and pollution,
2. using such measures as temporary/weekend street closures and/or permanent re-routing of traffic; or
3. introducing natural or man-made noise barriers.

User: Claire Mellish

The policy on noise should make explicit reference to the need to reduce the impacts of noise on green space, and other relevant policies amended accordingly.

Amend Policy D13(B) as follows:

Boroughs [etc] should identify and nominate new Quiet Areas and protect existing Quiet Areas in line with the procedure in Defra's Noise Action Plan for Agglomerations and ensure local green space is improved in line with Policy G4 (as amended) including by:
- taking action to reduce traffic noise around parks which are severely impacted by traffic noise and pollution, using such measures as temporary/weekend street closures and/or permanent re-routing of traffic; or introducing natural or man-made noise barriers.

User:	London Borough of Sutton

OBSERVATION. The London Borough of Sutton broadly supports the approach to noise. Given that Policy D12 Agent of Change principally relates to noise, the council considers that there is scope to amalgamate policies D12 and D13 and streamline to avoid repetition of national policy and guidance. The council considers that clarification should be provided regarding ‘Tranquil Areas’ which are referred to at paragraph 3.13.6 but are not addressed within the policy.

User: Mrs Alona Sheridan

The policy on noise should make explicit reference to the need to reduce the impacts of noise on green space, and other relevant policies amended accordingly.

Suggested change: Additions should be made to Policy D13 Noise as follows:

- Para B: Boroughs [etc] should identify and nominate new Quiet Areas and protect existing Quiet Areas in line with the procedure in Defra's Noise Action Plan for Agglomerations **and ensure local green space is improved in line with Policy G4 (as amended) including by:**
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User: Blanche Cameron

The policy on noise should make explicit reference to the need to reduce the impacts of noise on green space, and other relevant policies amended accordingly. **Proposed change:** Additions should be made to Policy D13 Noise as follows:

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- **taking action to reduce traffic noise around parks which are severely impacted by traffic noise and pollution, using such measures as temporary/weekend street closures and/or permanent re-routing of traffic; or introducing natural or man-made noise barriers.**

User:	Kew Society

Policy D13 Noise

London should adopt the World Health Organisation guidelines on noise levels, not least relating to Heathrow. These are detailed in the RHC response to the National Policy Statement: http://www.richmondheathrowcampaign.org/.

User:	East of England Aggregates Working Party

EEAWP also notes **policy D12** (Agent of Change) which together with **policy D13** (Noise) places the responsibility for mitigating impacts for existing noise generating activities or uses on the proposed new noise-sensitive development. The inclusion of these policies is supported as it is considered that it will add further weight in the retention of wharves and railheads and aggregate recycling facilities in the capital in areas where there is also a demand/need for noise sensitive development such as housing and associated development.

Policy DF1 Delivery of the Plan and Planning Obligations

User:	London Borough of Haringey

The Council supports this policy.

User: London Borough of Lewisham

We are generally supportive of the policies related to infrastructure, and we welcome the continued commitment to delivering infrastructure that underpin the Mayor's Good Growth ambitions. The narrative around the Plan's focus on the need to better integrate transport, infrastructure and affordable housing investment is particularly compelling. We are strongly supportive of the continued commitment to the delivery of strategic transport infrastructure including the Bakerloo Line Extension (BLE).

However, to achieve Good Growth both Phase 1 and Phase 2 of the BLE will need to be delivered. It will also be essential for strategic transport infrastructure to access Mayoral CIL funds, as well other funding options. The Plan recognises that these funding sources will play an increasing role in supplementing the funding of a wide range of future infrastructure delivery. We would welcome further details and support from the Mayor and Central Government over the resource implications of the Plan; relating to both the capital funding of the infrastructure championed within the Plan and the impact on London Boroughs resource in managing this process, which are already under considerable pressure. This would help to ensure the Plan is deliverable and can be found sound.

We have concerns about prioritising planning obligations for affordable housing over other types of infrastructure. This would have implications on key town centre mixed-use scheme in the borough (such as Catford) where a mixed focus on the provision of jobs, economy, retail, leisure, civic, culture and community needs to be balanced against other demands such as affordable housing.

Furthermore, the NPPF provides sufficient guidance on the role of planning obligations and London Boroughs should retain the ability to negotiate planning obligations and apply discretion to tailor funding to both strategic and local circumstances. This is necessary to reflect the unique local funding context related to both S106 and CIL and so that health and education can be better embedded into development obligations. Funding should also be allocated in a targeted way to make use of the opportunities that arise and to ensure new development helps to reduce inequalities across the borough.

User:	London Borough of Brent
The Council supports this policy.	

User: London Borough of Bromley

Existing policy 8.1 ‘Implementation’ is a higher strategic level policy with consideration given to creation of Mayoral Development Corporations and Housing Zones, and encouraging the Boroughs in developing their own Community Infrastructure Levy’s to ensure provision of infrastructure; the thrust of these aims has been fulfilled. Again the specific previous policy 8.3 ‘Community Infrastructure Levy’ is now subsumed into DF1 whereby boroughs are encouraged to consider the Mayors priorities when setting out their Regulation 123 lists. This Borough is developing a local CIL and authorisation has been given by Executive for the first public consultation to begin in January 2018. Whilst the Borough has an emerging scope for the local Regulation 123 list developed directly from the Infrastructure Delivery Schedule list of topic areas for projects, the specific list will not be confirmed until the next consultation phase later in 2018.

In response to the ‘2050’ consultation in 2014 the Leader Cllr Carr stated the importance ‘to make long term plans for the Capital to ensure infrastructure in Outer South East London is provided in full so as to realise opportunities for growth’.

User: London Councils

This policy pushes back against viability objections to planning gain, and notes the community infrastructure levy, which is welcome. The accompanying text sets out in detail a) the funding gap for London, b) the Mayor's desire for devolution of fiscal powers, and c) the alternatives to greater public sector funding, namely land value capture, private sector investment, and variously reducing demand.

The policy is welcome but, as stated above and elsewhere, there are concerns over whether current mechanisms for ensuring the provision of social infrastructure are sufficient given the funding gap. The policy could be more explicit in identifying that applicants should take account of borough plans as well as the London Plan to ensure a balanced approach to infrastructure funding. Other options could be considered, such as payment for an ecosystem services model that mitigates carbon improve air quality and improves health. Existing carbon offset funds should be considered as part of this overall approach.

London Councils agrees with the findings of the London Finance Commission 2017 and supports the devolution of fiscal powers, property taxation and exploring effective ways of Land Value Capture. Government may also wish to consider devolving specific funding streams and taxes linked to certain services and activities. For example, environmental taxes, could fund the growing cost of waste management. In return, there could be performance targets that would aim to incentivise improved recycling rates and other activities that impact on climate emissions. While not all services are suitable for target-driven mechanisms, for example social care, some are more naturally linked to such models of financial risk and reward. With a resource base that is more responsive to economic cycles, property taxes are especially appropriate for funding investment in infrastructure and housing.

London has already seen successful use of mechanisms that deliver additional growth in business rates, such as the Business Rate Supplement, which funded Crossrail, and the Tax Increment Financing schemes which are helping to fund redevelopments at Brent Cross and Nine Elms. Retention-sharing mechanisms like this could be adapted for other infrastructure projects with other types of taxation. For example, as part of the evidence to support the funding of CR2, London Councils has looked at a scheme which could involve a share of the uplift in stamp duty land tax rather than business rates, if this can be attributed locally. Early estimates suggest this could generate significant contribution if permitted. As the Government will get a ‘return on its investment’ for funding major infrastructure projects such as CR2 in London, it is in the best interests of local and central government to allow areas to be able to use a share of this uplift in order to unlock funding and help pay for such developments up front.

Initial assessments suggest that the returns on capital investment in London will be very large, even taking Brexit into account. London is a highly attractive global city for in-migration and its exceptionally large and dense employment agglomeration encourages high productivity levels. London’s economy could fund its infrastructure investment requirements from the tax on the growth that that same investment will generate. The growth should also pay for the additional public services that a larger population will demand, and it will enable London to grow its contribution to the national exchequer. Thus London’s investment could be self-funded and provide a national dividend.
London is heavily reliant on financial transfers from national government compared other international comparator cities. Fiscal devolution would enable accountability, transparency and align spending to Londoners’ priorities.

The policy also refers to the role that large sites can play in delivering necessary health and education infrastructure without identifying what constitutes a large site.

Transport and affordable housing are rightly recognised as key priorities. However, boroughs need to take a balanced approach to setting regulation 123 lists for CIL to ensure that the full range of infrastructure needs can be met. The investment priorities of borough need to take account of future needs and these can vary from transport and infrastructure.

The policy states that ‘boroughs are also encouraged to take account of part D in developing their CIL charging schedule and regulation 123 list’. This contradicts the approach to economic viability set out in the Government guidance on CIL rates. It places too much prominence on the viability of development on individual sites rather that looking at viability across a borough. There is concern that the current wording may undermine the ability of boroughs to argue that, while a particular site may be unviable due to CIL rates, development sites across the borough may still be viable and therefore the levels of CIL needed to fund necessary infrastructure can be charged. This could ultimately lead to a reduction in the amount of CIL that can be collected and infrastructure funded.

User: London Borough of Tower Hamlets

Support parts A, B and C and suggest addition to wording (See additional box below).

Parts D and E: The Council finds the prioritisation of affordable housing and strategic transport in terms of planning obligations to be problematic. This could lead to underfunding of health, education and other infrastructure which has consequences for the sustainability of development.

Suggested wording for Policy DF1

DF1
A. Applicants should take account of Development Plan policies when developing proposals and acquiring land. It is expected that viability testing should normally only be undertaken on a site-specific basis where there are clear circumstances creating barriers to delivery.

B. If an applicant wishes to make the case that viability should be considered on a site-specific basis, they should provide clear evidence of the specific issues that would prevent delivery, in line with relevant Development Plan policy, prior to submission of an application. In addition, viability can only be considered on a site specific basis where the proposed scheme varies significantly from any scheme on the site in question that was viability tested as part of the evidence base supporting the relevant Local Plan.

C. Where it is accepted that viability of a specific site should be considered as part of an application, the borough should determine the weight to be given to a viability assessment alongside other material considerations. Viability assessments should be tested rigorously and undertaken in line with the Mayor's Affordable Housing and Viability SPG.

D. When setting policies seeking planning obligations in local Development Plan Documents and in situations where it has been demonstrated that planning obligations cannot viably be supported by a specific development, applicants and decision-makers should firstly apply priority to affordable housing and necessary public transport improvements, and following this:
1. Recognise the role large sites can play in delivering necessary health and education infrastructure; and
2. Recognise the importance of affordable workspace and culture and leisure facilities in delivering good growth.

E. Boroughs are also encouraged to take account of part D in developing their Community Infrastructure Levy Charging Schedule and Regulation 123 list

User: Environment Agency

We consider that the policy should include a reference to ‘environmental infrastructure’ (Point D) in identifying infrastructure priorities for applicants and decision-makers. This is critical to delivering the Plans objectives the places people want to live in and can thrive.

Environmental infrastructure such as that for tidal, river and surface water flooding, providing treatment for wastewater, and for waste treatment, and to provide green space is essential to enabling sustainable and timely growth, and to delivering the Mayor’s Environment Strategy.

We suggest that it would assist the Plan’s delivery to develop a London Plan ‘Implementation Plan’. This may detail interim targets / key indicators of performance against your objectives for the different sectors, given the reliance on partnership and collaboration for Plan implementation.

We have concerns with how some of the figures for flood risk, water management, Green Infrastructure, and waste capacity have been derived and represented within the London’s strategic infrastructure requirements report. We look forward to continuing to work with you and your consultants, ARUP, on resolving these issues to ensure all decisions are underpinned by a sound and complete evidence base

Recommendation:

- Add to policy point D. to refer to planning and funding of environmental infrastructure as a priority.
- We recommend that the Mayor’s Strategic Infrastructure Investment Programme should be used as a reference point, and that borough’s priorities are linked to this. This may include prioritising environmental infrastructure, such as improved flood defences, where this would enable sustainable growth.
- We recommend that consideration be given to developing a London Plan ‘Implementation Plan’

User:	Environment Agency

We consider that the policy should include a reference to ‘environmental infrastructure’ (Point D) in identifying infrastructure priorities for applicants and decision-makers. This is critical to delivering the Plans objectives the places people want to live in and can thrive.

User: London Borough of Waltham Forest

We welcome parts A, B and C of the policy which are firm on viability and how it should be taken into account in the plan making and planning process.

We agree with the priorities set out in part D of the policy which prioritise the delivery of affordable housing, public transport and then social infrastructure.

However, we consider that this policy does not take into account the Mayor's CIL Draft Charging Schedule for Crossrail 2. Our own analysis, as set out in our response to Mayoral CIL2, shows that under the current regime, approximately 23.5% of all developer contributions secured through CIL is passed to the Mayor as MCIL. Under the proposed MCIL2, circa 48% of all developer contributions secured through CIL would be passed to the Mayor. The Borough's primary concern is that the remaining 52% is expected to fund all other forms of social, sustainable and green infrastructure, as well as local transport improvements. We do not consider this to be an equitable split and it would seriously compromise the Borough's ability to deliver 'Good Growth' as well as the many other policy commitments as prescribed in the Draft Plan.

We have also recently reviewed our CIL Viability analysis, incorporating the draft MCIL2 rates from the Preliminary Draft Charging Schedule. Despite having some of the lowest comparative charges in London, the conclusion of this work is that the Borough is now heavily constrained in its ability to increase local CIL charges both geographically and within particular use classes as MCIL2 has the effect of 'scooping up' any increases in value that could have justifiably been captured via local CIL. We consider that this will make delivering this policy difficult. We would welcome a conversation on this with the Mayor, GLA and TfL.

User: Royal Borough of Kingston

RBK agrees strongly with the intent of the policy in respect of ensuring that developers take into account development plan policies when progressing proposals. As written in response to the recent government consultation, *Planning for the right homes in the right places* , RBK has significant concerns about the failure in many cases for developments to meet the costs of delivering the necessary infrastructure due to viability.

However, clarification is sought on the following matters: Firstly, the policy requires evidence of viability issues in a development to be provided prior to the submission of an application. This requires pre application discussions. Further guidance is sought on the enforceablity of this as pre-application discussions are best practice but, as we understand, not mandatory.

Secondly, and linked to the above, the policy requires boroughs to accept viability assessments prior to the submission of applications. In those instances where agreement is not reached on viability issues, should boroughs be refusing to validate applications? RBK has concerns about this approach, but seek further guidance about the actual mechanisms intended.

The hierarchy which prioritises obligations is unwelcome. RBK maintains that boroughs should determine their own priorities. However, should this policy come into force, further clarity is needed in relation to the tests which govern planning obligations (necessary to make a development acceptable, directly related to the development and fair and reasonable relative to a development's scale). These tests may suggest a different hierarchy, with other requirements prioritised over, for example, affordable housing. It is not clear whether the proposed policy provides sufficient flexibility to deal with these instances, and it may therefore not be consistent with current legislation.

The policy also states that the hierarchy should be taken into account when in drawing up a Regulation 123 list. However, it is not clear if this means that councils should prioritise CIL in the same order of hierarchy, or whether they should do the opposite as they can expect development itself to bring forward the higher priority development types through planning obligations. Clarification is sought on this.

Overall, although RBK do not oppose the intent of this policy, it would benefit from additional supporting text or policy wording to explain and overcome the identified issues, above.

User:	Ministry of Housing, Communities & Local Government
You will want to consider how your London Plan supports the use of developer contributions for new or expanded facilities needed across wider public services as a result of population growth.	

User: Westminster City Council

This policy focusses almost exclusively on matters of procedure and as such goes beyond the proper scope of the spatial development strategy. Criterion C merely repeats basic planning law and could be omitted.

The very long section on “the funding gap” implies that as things stand it is unlikely there are the resources to deliver the strategy outlined in the DRLP. If this is the case the question arises whether it meets the deliverability aspects of the effectiveness limb of the test of soundness set out in paragraph 182 of the National Planning Policy Framework. The Mayor needs to be clear about the extent to which he will require additional resources to deliver his spatial development strategy and the likelihood of these being granted over the period of the Plan. Any expectations that planning obligations will increasingly be used to bridge the gap on unfunded strategically important infrastructure could have negative consequences on boroughs ability to raise funds for much needed infrastructure investment within their areas.

This section strays some way from the Mayor’s strategy for London’s spatial development and could be significantly shortened.

User: London Borough of Southwark

The council agrees that viability testing should only be undertaken on a site-specific basis where there are clear circumstances creating barriers to development.

The council recommends the Mayor does not allow for site-specific exceptional or abnormal costs (which may include ‘issues such as high levels of contamination, requirement to divert major utilities, poor ground conditions necessitating special foundations/ ground works’ (Affordable Housing and Viability SPG). It is one of the inherent risks of being a developer and should not be a factor for planning policy. The presence of such issues will impact land value and the cost should never be born through a reduction in Planning Obligations. The consultant doing the due diligence will need to have professional indemnity insurance to cover any oversight on their part in reporting to their client. Where liability is qualified by the consultant, then the developer should build in sufficient contingency to cover any unknowns.

The policy notes that where viability is a genuine issue, boroughs should prioritise affordable housing and necessary transport infrastructure. The council recommends the Mayor considers special exemptions to this where a site can contribute towards the delivery of essential social infrastructure such as education or health facilities and acknowledge this may be given elevated priority over affordable housing or transport infrastructure. This is particularly important where the planning authority does not own land or where social infrastructure can be best provided on a mixed-use private-led scheme.

User: London Borough of Redbridge

It is clear that the draft Plan is ambitious and requires a significant level of funding and investment. As such it will be important that the Mayor continues to lobby government to secure the funding to meet the large anticipated shortfall.

Whilst we appreciate the need to deliver higher housing targets, more certainty is needed that the current mechanisms for securing funding towards social infrastructure is sufficient to meet the needs of a rising population. Whilst the Mayor is explicit that everyone has a part to play in implementing the London Plan, it would be beneficial for the London Plan to provide more guidance on how the GLA is planning to work with boroughs and other key stakeholders to ensure that an adequate level of social infrastructure is funded and provided alongside housing growth. Redbridge is very keen to work with the GLA on this from an early stage ensuring the right mechanisms are in place to secure sustainable development for our residents.

Policy DF1 pushes back against viability objections to planning gain, and notes the community infrastructure levy which is welcome. The accompanying text sets out in detail the funding gap for London, the Mayor’s desire for devolution of fiscal powers, and the alternatives to greater public sector funding, namely land value capture, private sector investment, and variously reducing demand.

While the plan supports borough involvement in the direct delivery of housing, it does not make a London specific case for the devolution of national policy and funding to support local authorities to build more housing. Joint GLA/borough lobbying around flexibilities on right to buy receipts and Housing Revenue Account (HRA) borrowing would be powerful in enabling boroughs to become key providers of affordable housing in the city.

User: London Borough of Wandsworth

The Council has already responded to the Mayors Homes for Londoner's Affordable Housing and viability SPG consultation. Since then the Council is still concerned with the potential unknown quantum of affordable housing proposed where an applicant aims to use the Mayors fast track approach and would therefore not require a viability appraisal for above 35%. The Council require any scheme delivering less than 50% affordable homes to submit a viability appraisal to support the quantum of affordable housing being proposed. It is unclear from the SPG how a council would know whether a scheme providing 35% affordable housing that was policy compliant could in fact deliver more than 35% affordable housing, as there will be no requirement for an applicant to provide a viability appraisal with such an offer.

Furthermore it is not clear how a council would be able to test the viability of providing other planning obligations as well as affordable housing. As at present 35% affordable housing is rarely achieved as is evidenced for London by the Mayor's AMR, In reality if negotiations seek to secure other essential planning obligations such as education or community facilities, the affordable housing offer is reduced below 35% and the overall viability of planning obligations sought by the council can be tested. Related to this point, the emerging Local Plan policy approach requires an increase in industrial land on site but the increased level of affordable housing required in industrial areas may pressurise the design of a site and undermine the overall design of a scheme as competing policy requirements are balanced. This approach causes uncertainty and the Council seeks clarification of how competing policy requirements are balanced in redesignated industrial areas.

User:	Royal Borough of Greenwich

We are disappointed that Policy DF1D makes no reference to the need for planning obligations to reflect local as well as strategic priorities. We do not consider it appropriate for the Mayor to set priorities for planning obligations in such a prescriptive way, and would question if the proposed approach accords with the relevant regulations regarding planning obligations. While it is appropriate for the Mayor to take an overview of the strategic priorities, this must not disregard the relevance of local priorities when seeking planning obligations.

User: London Borough of Richmond Upon Thames

The Council has already responded to the Mayors Homes for Londoner's Affordable Housing and viability SPG consultation. Since then the Council is still concerned with the potential unknown quantum of affordable housing proposed where an applicant aims to use the Mayors fast track approach and would therefore not require a viability appraisal for above 35%. The Council require any scheme delivering less than 50% affordable homes to submit a viability appraisal to support the quantum of affordable housing being proposed. It is unclear from the SPG how a council would know whether a scheme providing 35% affordable housing that was policy compliant could in fact deliver more than 35% affordable housing, as there will be no requirement for an applicant to provide a viability appraisal with such an offer.

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planning obligations sought by the council can be tested. Related to this point, the emerging Local Plan policy approach requires an increase in industrial land on site but the increased level of affordable housing required in industrial areas may pressurise the design of a site and undermine the an overall design of a scheme as competing policy requirements are balanced. This approach causes uncertainty and the Council seeks clarification of how competing policy requirements are balanced in redesignated industrial areas.

User: Network Rail

The draft Plan makes reference to fiscal devolution and greater powers for the Mayor in section 11.1. Network Rail does not have a view on devolution, as this is a political decision, but welcomes any benefit to the delivery of transport scheme from changes to the structure of funding.

In terms of rail, Network Rail has a good record of working effectively with TfL and its rail operator and works effectively with any specifier/franchisee/concessionaire. If the devolution of service specification from the Department for Transport to Transport for London was to occur, Network Rail's assumption is that our role would remain unchanged. It should be noted that capacity and journey time issues for rail services within London are, in the main, due to the underlying infrastructure constraints, not governance arrangements.

Report the economic value of investment in rail projects

The Plan should also report the economic value of delivering rail enhancement schemes. Some of Network Rail's major projects will return £4 of economic benefit for every £1 invested and better rail connectivity can unlock housing supply and take people off the roads. This rail investment helps drive London and the South East's economy, with about £4.3 billion spent annually with businesses and creating about 70,000 jobs.

User: London Borough of Havering

The draft London Plan should highlight the importance of opportunities being take to ‘future proofing’ in development areas and / or for individual proposals. The opportunities afforded by such schemes including ‘empty’ conduits which may then accept fibre and other cables should be referenced.

Boroughs should make sure that new developments are provided with infrastructure. However the infrastructure in some places, such as Rainham is currently not adequate, so this needs to be supported prior to/in addition to organisation within individual buildings.

In the section 11.1.44 on digital infrastructure provision, it states that decisions on where to invest in infrastructure are determined on a demand-led basis. However it does not say whether this takes into account the needs of businesses as well are residential areas. We will not be able to develop the industry improvements in Rainham associated with greater intensity of development without improvements in digital infrastructure in the area.

User: London Borough of Havering

Please also see Annexe 1 of the Havering response letter where there is extensive commentary about the importance of social and community infrastructure facilities being provided to support new homes and communities.

The London Plan should recognise that whilst physical infrastructure can be planned/funded, this does not necessarily mean that it will be resourced. Historically, for example, there have been difficulties in recruiting General Practitioners (GPs) to Havering. This has meant that, whilst Havering has lower level need compared to inner London boroughs, there has been a greater challenge in meeting the need.

The delivery of homes envisaged in the draft London Plan will increase the demand for sports and social / community infrastructure and this should be recognised. There should be a specific section on funding for sport.

The section on Transport should recognise that safer walking and cycling routes will require increased funding.

The section on funding for culture should set out a Mayoral commitment to securing improved funding for culture such as statutory funding.

The draft London Plan needs to recognise that funding and resources in boroughs is currently tightly constrained and will remain so. The responsibilities set out in the draft London Plan for London Boroughs in terms of plan making and preparation, as well as the preparation of specific items such as design codes, will be demanding.

The Mayor should look to assist and / or provide appropriate resources and guidance so that boroughs can meet these challenges effectively and efficiently without compromising on their other planning activities and functions.

User:	London Borough of Harrow
The Council supports this policy.	

User: Mr Joe Ward

The provision and improvement of green space requires funding to help deliver the Mayor's aspirations for 'good growth' and increasing London's green cover and should be addressed in Policy DF1.

Proposed change: Policy DF1 D (2) should be amended to read as follows:

'Recognise the importance of affordable workspace and culture and leisure facilities, **including public green and open space,** in delivering good growth.'

Rationale: Planning obligations and a proportion of Community Infrastructure Levy should go towards improving parks and green spaces. Where there is major development, in particular close to parks or green spaces, there ought to be a contribution by developers towards improving the quality, including enhancing the tranquillity, of green space, and to help fund future management, for example via an endowment.

User: Berkeley Group

Cumulative Impact

1.12. The draft policies will result in considerable additional cost for development and we are concerned that the cumulative impact of these costs will be to make development unviable, or make residential development less viable than other uses. This is an important consideration in London where most areas are mixed use and sites can be developed with different uses and also as sites can be converted through permitted development rights.

1.13. The draft plan introduces the threshold approach to viability into planning policy, with the threshold set at 35% and 50%. This will prove challenging for many sites where considerable investment is needed in decontamination, demolition, servicing, infrastructure and place making.

1.14. In addition to affordable housing, direct costs will result from policies on energy with significant off-set payments required to achieve ‘zero carbon’; air quality where the policy is not clear but the implication is that there will be contributions to air quality measures in the local area; affordable workspace; and policies to mitigate transport impacts. In addition other policies will increase development costs for example energy policies, housing standards and urban greening.

1.15. Other policies will reduce the viability of development such as the restriction on parking provision which is important for sales, especially of family homes, and policy requiring re-provision of industrial floorspace. For development on former industrial land, the private homes will have to cross-subsidise provision of industrial floorspace including possibly affordable workspace, affordable housing, CIL, open space and other planning benefits. A reduced quantum of homes will have to bear higher costs. We do not believe these costs have been fully taken into account in the viability assessment.

1.16. Over time it may be possible that the costs of policies will be reflected in land values, albeit the viability assessment technical report (paragraph 26) highlights that land values are driven by house prices. As development accounts for only 1% of the housing stock in London, it is the second hand market that establishes house prices and therefore land values.

1.17. To the extent that costs flow through, it will take time and many sites that are going through planning now were bought historically, and there will be new applications/amendments (S73 applications) brought forward on land purchased some time ago. Even with extensive due diligence not all costs can be known at the outset and there will still be considerable risk to the developer.

1.18. Landowners are not compelled to sell and may decide not to if they do not consider there is sufficient incentive to do so. The policies could therefore result in reduced land supply.

1.19. As recognised in the NPPF, landowners must be incentivised to sell sites for development, and developers rewarded for the risk of development. This is a sensitive equation that will vary according to different circumstances, but if the returns are not sufficient land will not be brought forward, development will not happen and the much-needed homes and other investment will be lost.

1.20. For brownfield sites, the position will be complex with existing uses on site which will have a value to the landowner; the possibility of different types of development and possibly conversion through permitted development rights; and high costs of redevelopment such as decontamination and demolition. Brownfield developments tend to be complicated, risky and costly.

1.21. The policies in the London Plan cover the period to 2040. Whilst it is likely that there will be a review in this period, it is important that the policies can be applied across economic cycles. The draft plan would therefore benefit from greater prioritisation with a clearer policy hierarchy.

Implementation

1.22. The test of the effectiveness of the plan will be in its implementation. Ultimately, the draft London Plan will be judged on whether 65,000 homes are delivered each year in London. The London Plan is part of the statutory development plan and is therefore implemented by the Mayor and boroughs. It is critical that is couched positively and clearly and in a way that supports, rather than restricts, development.

1.23. We are concerned that many of the policies are drafted in a restrictive way, including some that promote refusal of applications such as those with unnecessary street furniture [D7], that have not clearly demonstrated how noise impacts will be mitigated and managed [D12], exceeds the threshold height of a Landmark Viewing Corridor [HC4], would harm the Green Belt [G2] or MOL [G3] and those with impermeable paving [SI13].

1.24. Planning is always a matter of balance, judgement and trade-offs. It is important that this is recognised in the drafting of policy and its application. It would not be possible to meet all the policy requirements in the draft London Plan, nor those in borough local plans. In making decisions, the decision maker has to ‘weigh the balance’ of policies and material considerations, prioritising objectives and applying flexibility and pragmatism. As it is drafted, most applications could be refused if the draft London Plan policies are applied without sensitivity or a desire to support development. If this were the case the housing target would not be met. It is imperative that the policies are drafted in a way that considers their application and the draft Plan’s ultimate goal; to deliver good growth and more homes. It is critical that the Plan encourages flexible application of policies to take account the specific circumstances of different applications as well as the changing economic and other circumstances over the course of the Plan.

1.25. The London Plan is the strategic plan for the capital and we are concerned that in places it is not strategic and is too detailed. This adds to the policy burden that applicants have to deal with and could lead to conflict with local policies and priorities which could delay the planning process. The London Plan should also be consistent with national policy unless exceptional circumstances justify otherwise.

1.26. We would be pleased to discuss our draft response with officers ahead of the Examination to establish where there is common ground and to gain clarity where we have raised queries on the proposed approach.

User:	The Hammersmith Society

In respect of Plan policies on Design, Housing and Tall Buildings we consider that the London Plan should contain clear guidance on **complete transparency for all viability assessments**. This should be added to **Policy DF1** which should not be restricted to viability in terms of affordable housing, but to density in general on development sites.

User:	London Borough of Enfield - Public Health

Whilst the Board is strongly supportive of the London plan there remain concerns of how and when it will be implemented. Clarity on this would be welcomed.

User:	John Innes Society

HEALTH FACILTIIES
We broadly support these policies. It is unrealistic to continue with the current situation of reducing A&E, Maternity Units and Hospital Bed capacity while at the same time planning for an increase in population. Section 106 contributions need to be viewed with care, as there is no point in collecting money when there are no sites for new facilities. Transfer of land is a far better alternative. (11.1.38).

User:	John Innes Society

UTILITIES
11.1.42 We support the provision of heat networks.

User:	John Innes Society

11.1.43 We support the statement (which appears far too late in the London Plan) that “Investment ahead of demand will be required to ensure that the utilities are available when the sites are developed”.
This should have been in Chapter 1.

User:	John Innes Society

GREEN INFRASTRUCTURE
We support 11.1.45

User:	John Innes Society
11.1.46 suggest SUDS should be made obligatory for all developments, both public and private.	

User:	John Innes Society

WASTE AND CIRCULAR ECONOMY INFRASTRUCTURE
We broadly support 11.1.5 – 11.1.53.

User:	John Innes Society

CULTURAL INFRASTRUCTURE
We support 11.1.57 but S.106 contributions should be used with care and only taken where on-site provision or direct sponsorship is impossible. Where S106 money is required then the site or facility to be benefited should be identified and safeguarded at the same time.

User: Future Cities Catapult

4. Viability and data benchmarks

4.1. There is difference in access to data between the major developers and their consultants, and public planners, smaller developers and the public. This is one of the causes of the ill-functioning housing and land market, which leads to the appearance that the planning system is not delivering the quantum and quality of development required to support London's position as a leading World City. One of the biggest barriers to more transparent and consistent viability assessments is the lack of a standard format for submission of viability data. That alongside the confidential nature of viability reports means that there is not enough data to generate robust benchmarking figures to support planners when evaluating assessments. In light of the above we would recommend amendments to the following policies:

4.2. Policy GG4 - Delivering the homes that Londoners need, part E states that those involved in planning and development must:

"Establish ambitious and achievable build-out rates at the planning stage, incentivising build-out milestones to help ensure that homes are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value."

4.3. Though we fully support the policy, we suggest the addition of a requirement to standardise the method and data which is collected and make viability more open through the use of benchmarks to allow for this policy to be implementable. It is vital for the collection and sharing of data to be established early on in the process so that it can make these targets achievable.

4.4. We strongly support the inclusion of standardised and accessible viability information to be submitted as part of the Viability Tested Routes for planning applications as detailed in Policy H6 - Threshold approach to applications - Part E. It is essential to create a detailed standard for this data, particularly for those variables that are critical in determining viability, such as land price, expected sales values, etc. Viability assessments can and usually are updated during the viability process as new and updated data becomes available or as the development proposal is developed more in detail. In order to keep the data accurate as possible, viability assessments should have their dates made public.

4.5. Policy DF1 - Delivery of the Plan and Planning Obligations, part D sets out priorities in planning obligations should a site not be able to be seen as viable. In that respect we believe a more integrated approach to viability assessments which allows officers to compare the impact of multiple applications that ‘do not meet the threshold’ or cannot deliver all planning obligations due to viability is needed.

4.6. If these could be compared across a singular platform we’d have a better understanding of development impact. Paragraph 11.11.1 reiterates how the assessment of viability on a site-by-site basis has undermined the deliverability of plan objectives and increased land value. We agree and support change to policy to require all viability data to be shared - this would not compromise the confidentiality of the data if it were to be stored in one place, used to create benchmarks, and where different users have different levels of access to this data.

User: Berkeley Group

12. FUNDING THE LONDON PLAN

12.1. The threshold approach to affordable housing provides simplicity and clarity and a faster route to determination where the threshold can be met. The full cost of policies may not be known (and is not currently known for the draft London Plan policies), and even with extensive due diligence all the risks and costs may not be known when a site is purchased. It is therefore not possible to ensure that all policies are reflected in land values, and indeed the Mayor's evidence base recognises that the key determinant of land values is house prices. Applications will also be brought forward on sites purchased before publication of the draft plan. This may be on historic sites that have existing uses or on long term masterplans that are subject to amendments to reflect changing circumstances. There will therefore remain circumstances where it is not possible to meet the threshold and it is necessary to submit a viability assessment in support of an application. The ability to submit a viability assessment should not be at the discretion of the local authority, nor should the weight ascribed to it. Policy DF1 should be amended:

Policy DF1 Delivery of the Plan and Planning Obligations
B If(strikethrough) Where an applicant wishes to make the case that viability should be considered on a site-specific basis, they should provide clear evidence of the specific issues that would prevent delivery, in line with relevant Development Plan policy, prior to submission of an application(strikethrough).
C Where it is accepted that viability of a specific site should be considered as part of an application, the borough should determine the weight to be given to a viability assessment alongside other material considerations(strikethrough). Viability assessments should be tested rigorously and undertaken in line with the Mayor's Affordable Housing and Viability SPG.

13. VIABILITY ASSESSMENT OF THE DRAFT LONDON PLAN

13.1. Fundamental to delivering good growth, the draft plan's policies and objectives, and achieving an increased rate of housing delivery to achieve the new target, will be ensuring that development is viable and the draft plan does not place onerous obligations that will prevent development (NPPF paragraph 173).

13.2. We have reviewed the viability assessment of the draft Plan and have set out our observations below. In summary, we do not consider that the assessment has reviewed a representative sample of site typologies, in sufficient areas across London, and insufficient account is taken of the cost of proposed policies. Based on these comments we do not believe that it is possible to conclude from the assessment that the draft London Plan does not pose a risk to the viability of development.

Development typologies

13.3. The developments are not geographically representative of development across London; 15 of the 33 developments are in two boroughs (Hounslow and Waltham Forest).

13.4. The typologies are generally small, the largest being 750 homes (residential) built over six years and 1,500 homes (mixed use) built over ten years. Many of the sites, especially in Opportunity Areas will be considerably larger and may be delivered over decades. Large sites account for about a third of capacity in the SHLAA.

13.5. Many Berkeley Group developments are far larger than 1,500 homes; Beaufort Park will be 3,500 homes, Southall Waterside 3,750 homes and Royal Arsenal, Woodberry Down and Kidbrooke Village will all have more than 5,000 homes. The development programme, over decades and economic cycles, means that the risk and finance profile will be very different than for smaller developments. It is important to test examples of developments of this scale.

Assessment inputs

13.6. The build costs do not take sufficient account of abnormal costs of regeneration projects such as remediation and demolition. Given the nature of the developments that we do, the abnormal costs will be significant and need to be taken fully into account to understand viability. For example, at London Dock demolition of the 1.2 million sq ft print works commenced before development adding significant cost and affecting cash flow. Most sites require significant remediation. At Southall Waterside the soil is so contaminated a ‘soil hospital’ has been established on site. Other costs might include build-over agreements for utilities or asset-protection indemnities for example when developing adjacent to a rail line.

13.7. The build costs are generally lower than we experience and are agreed in viability assessments for planning applications. There are costs, such as the LEAN premium, externals and fire safety, that are highlighted in the technical report but do not appear to be reflected in the appraisals.

13.8. The assessments assume that construction starts at the same time that the land payment is made, there is usually a lag of about six months where pre-commencement conditions are cleared, contracts are tendered and site set up is undertaken.

13.9. Our experience is that S106 costs exceed those used in the assessments.

13.10. The assessments assume that costs for basements/car parking are generally covered by revenues. This is not our experience and some allowance should be made as parking will still be required as will basements for energy and plant and cycle parking.

13.11. It is assumed that all homes are sold prior to the completion of construction, although the technical report (paragraph 44) notes that in London 40% of homes are pre-sold.

13.12. The development programme is highly simplified with no information on construction spend timing i.e. pre-construction (including basement); CIL / S106 initial payments, pre-planning fees and affordable housing revenues.

13.13. The marketing costs are at 3% rather than the standard rate of 4.5%.

13.14. The developer return is varied according to height (2 to 5 storeys at 15%; 6 to 20 storeys at 17.5%; and 21 plus storeys at 20%). We assess the expected return according to the risk, which may relate partly to height, but not solely.

13.15. Development returns for the largest site typologies, where IRR would normally be used as a benchmark, appear to be significantly understated.

13.16. The revenues for affordable housing is not evidenced and in our experience are very high.

13.17. The revenues from ground rents are high, and are applied to affordable housing. Given the recent Government announcement regarding legislation on ground rents they should be removed.

Impact of draft London Plan policies

13.18. The draft plan adds a number of new obligations and costs on development some of which have not been tested through the viability assessment.

13.19. We note that low cost business space and affordable workspace are assumed at 10% of space at 80% market rent.

13.20. No allowance is made for the cost implications of the policy for developments to be air quality positive which we expect could be significant. Greater clarity is required.

13.21. The cost of urban greening is not included in the external works. Consideration is also required of the potential loss of floorspace to accommodate urban greening.

13.22. The proposed restriction on residential occupation until industrial/mixed uses are completed and operational (policy E7) would impact on development cash-flow and the ability to fund the development.

User:	TUC London, South East and East of England

Policy DF1: Delivery of the Plan and planning obligations and funding

1. London Borough’s economic development units and planning teams have been weakened by funding cuts. The Community Infrastructure Levy Charging Schedule and Planning Fees should fund stronger EDU teams and planning teams.

User: Just Space

Policy DF1

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

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

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

POLICY DF1

A key issue undermining the effectiveness of the London Plan is therefore the significant funding shortfall in relation to meeting its ambitions. Alongside private sector borrowing for utilities, and central government grant for some of the capital costs of schools (about 1/3 of needed – 11.1.35), policy DF1 indicates that S106 income and CIL charges levied on private sector led developments are the only real sources of income identified to implement much of the London Plan including MAJOR STRATEGIC TRANSPORT INVESTMENTS and HOUSING DELIVERY. Although the Mayor argues that "The policies in the London Plan have been subject to a viability assessment which has tested the cumulative impact of relevant standards, obligations and requirements to ensure they do not put implementation of the Development Plan at serious risk.", we argue based on evidence from the London Plan Viability Study, the London Plan IIA and the Homes for Londoners SPG that this is not an accurate representation of the funding situation. There is not a feasible funding plan in place, which puts at significant risk the delivery of the London Plan policies, notably its overall ambition for supporting "good growth". We also note that S106 is barely mentioned in the London Finance Commission deliberations (a brief mention on p. 9, as part of the Levies on property development which can be raised by London's government).

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

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

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

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

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

“14.2.6. The addition of an allowance for abnormal costs has a bigger impact on schemes in the lower value bands than those in higher value bands and may tip a scheme over into non-viability. However, the addition of grant (we modeled at £28,000 per affordable unit) improves viability and can help secure more affordable housing in some cases. Away from the lowest value area (E), grant can directly impact on the amount of affordable housing achieved although the picture is mixed and varies between the type of development illustrated by the case studies (e.g. two case studies in value area D were originally tested at 20% as they were unviable at 35%, and with grant one of them is able to provide in excess of 35% while the other is not). “ (VIABILITY STUDY, p. 102).

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

“5.6.14 Some sites have other costs that are exceptional, reflecting the specific development found there, and which are not readily replicated for policy testing purposes – for example new transport or social infrastructure. While sites have been tested with onsite and offsite infrastructure requirements, ***scenarios with very substantial exceptional costs are atypical and lie outside the scope of this testing***. Such schemes may be subject to site specific testing where the infrastructure cost is preventing delivery. It is also noted that, where there are exceptional development circumstances and associated costs, these may enhance market values and/or increase costs and it would be expected that these would be reflected in the land value for the site. Furthermore, it is understood that the GLA also engages with landowners and developers and provides funding to accelerate delivery on brownfield land such as in Housing Zones and facilitates funding bids from sources such as the Housing Infrastructure Fund.”

(VIABILITY STUDY, P. 33; emphasis added)

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

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

And from the Mayor's "Homes for Londoners: Affordable Housing and Viability SPG":

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

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

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

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

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

This concern was also reiterated in the IIA:

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

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

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

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

User: Just Space

POLICY DF1 D: Prioritising Transport and Housing

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

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

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

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

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

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

The viability study also notes:

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

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

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

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

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

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

However, we suggest that providing lifetime and sustainable neighbourhoods is crucial to support London's role as an attractive city for both local residents and successful economic activity and to meet his obligations not to cause Londoners harm. Squeezing housing and transport funding out of S106 and CiL charges on specific local developments risks undermining the quality of the built environment. Bringing forward the example of the Old Oak Park Royal Development Corporation, which is an opportunity area with a £2.5bn infrastructure price tag, the Mayor himself observed in his Review of the Old Oak Park Royal Development Corporation, that lack of core financial investment for infrastructure and consequent reliance on planning gain would, "In addition to impacting on the ability of developments to provide an acceptable level of affordable housing, the high cost of infrastructure may force a quantum and scale of development that is unacceptable in height, scale, density or mass – and at the expense of community infrastructure." We note that of the planning determinations to date in the Old Oak area, only 30% of affordable housing seems to have been delivered, 35% being discounted market rents of 50-80% and the remainder are intermediate products. We also note that restricted public realm and planning obligation requirements (including numerous playgrounds on the roofs of buildings, which do not conform to DnLP Text 5.4.3 or Policy S4 B2, both of which were expectations in the previous London Plan. (This and further details are available in the Grand Union Alliance, submission to consultation on Regulation 19 OPDC Local Plan).

User: Just Space

POLICY DF1 A, B C

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

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

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

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

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

Conclusions

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

User: London Borough of Bexley

Policy DF1 Delivery of the plan and planning obligations addresses delivery of the London Plan. The policy itself focuses on viability, providing a hook to the existing guidance in the Mayor's Affordable Housing and Viability SPG. The Council strongly welcomes a tough stance to require proposals to meet planning obligations, including affordable housing secured through section 106 agreements. **Policy DF1** states that viability testing should only be undertaken where the applicant has made a convincing case that there are clear circumstances creating barriers to delivery. This presumption that applications will be policy-compliant is welcome, in light of the trend since the introduction of the NPPF for developers to submit viability assessments almost as a matter of course in order to demonstrate that the proposal need not be policy-compliant. When a viability assessment is undertaken, **Part C** gives boroughs the power to determine the weight to give to the assessment, which presumably gives discretion to refuse an application even if the assessment shows that planning obligations cannot be met.

Part D of **Policy DF1** considers situations in which viability assessments demonstrate that planning obligations represent a genuine barrier to delivery. It sets priorities for the obligations which should be met first. Affordable housing and public transport are prioritised, followed by provision of social infrastructure, namely health and education facilities, and provision of affordable workspace, and culture and leisure facilities. Whilst the Council recognises that the urgent need for more housing and the strategic nature of public transport provision provide a justification for citing those two obligations as top priorities, it is recommended that priorities after that are left to the discretion of the local authority – notably schools. Indeed, in areas of regeneration where there is already a concentration of affordable housing, it could be argued that prioritisation of additional affordable housing, which would have an impact on the principle of mixed and balanced communities, is inappropriate. Different boroughs will have different needs and priorities based on local circumstances, and should not be forced by the policy to secure particular planning gains when there might be more of a pressing need for another type of social infrastructure. **Part E** encourages the priorities set out in **Part D** to be reflected in the London boroughs' community infrastructure levy charging schedules and Regulation 123 lists; similarly, this prioritisation should not be imposed on boroughs, but rather they should be given discretion to prioritise based on local circumstances and local needs.

The supporting text in **Paragraphs 11.1.8** to **11.1.67** is a detailed and well-considered discussion of funding and other delivery issues. Whilst being highly valuable, it is noted that there is not a strong relationship between the supporting text and **Policy DF1** itself.

Paragraphs 11.1.8 to **11.1.13** address the significant funding gap identified to deliver the proposals of the draft London Plan, which is defined as the gap between the public sector funding required to deliver and support London's growth, and the amount currently committed to London. The approaches for closing the funding gap (fiscal devolution and land value uplift) are welcome, particularly land value uplift, which has been proven successful in other city-region areas. The commitment to locating new funding streams, including new environmental levies, to fund green infrastructure is also welcomed. However, this acknowledged infrastructure funding gap for the proposed growth in the Plan of some £3.1bn per annum has no wider agreement as to how this can be bridged and raises fundamental issues as to the deliverability and, therefore, soundness of the plan – particularly where housing targets are increased significantly and are expected to be delivered in the early phases of the plan period.

The remainder of **Chapter 11**, from **Paragraph 11.1.14** to the end, considers delivery of housing and infrastructure. The text includes a number of realistic delivery mechanisms, some of which are currently used and others which need to be trialled. With regards to housing, the Council notes that '*direct intervention where land is suitable for development*' may not be appropriate in areas where the land values are insufficient to attract developers. The London Plan should also clarify the mechanisms through which the Mayor will work with London boroughs, or intervene as necessary, where they fail to deliver growth both in Opportunity Areas and against housing targets, including the Government's Housing Delivery Test. Finally, references to the London Land Commission and Homes for Londoners are notably absent from **Paragraph 11.1.22** as key mechanisms to deliver public sector land to the market.

User: SEGRO

Industrial Development Viability – flexible/affordable workspace and affordable housing
Industrial development delivered either as part of an intensified multi-storey scheme or through a mixed-use industrial/residential development is highly challenging and more costly in terms of financial viability and deliverability. In the case of intensified industrial development in particular, it is unlikely to come forward in most instances unless it is being used to offset higher value residential development, or is facilitated by public funding or GLA and London Borough level support.

Consequently, we are very concerned about some of the planning obligations proposed within the Draft London Plan, which we consider will stifle the delivery of the type of innovative industrial development promoted by the Mayor, and prevent a number of the Plans objectives being realised without public sector support or funding.

London Plan Viability Assessments
We have also assessed the findings of the London Plan Viability and conclude this does not present an accurate representation of the financial viability for industrial development in London. By comparing the Viabilities Study's assumptions against current SEGRO developments in Inner London, we found the following:
? Capital values we over optimistic
? Rents were high compared to our evidence (£18 v £11 at our SEGRO Park Newham scheme)
? There was no account of void or rent-free periods
? Yield assumptions create higher capital value then in our experience
? Costs were low (i.e. these only take account of 'vertical build' costs and not external or abnormal costs, which account for a large proportion of the overall development cost)
? No statutory fees such as MCIL/LCIL or S106 included
? Developer Profit is also incorrectly stated (calculated at 15% GDV rather than more normal 15% Profit on Cost.

User: Revo

An ambitious London plan will require significant investment and skills for the policies to take real effect. However, the structure of funding for public projects remains complex. Whilst the mayor controls a variety of funding sources (including business rate retention from 2018) for strategic infrastructure investment, there is still a shortfall and efforts to lobby central Government should continue to provide the necessary funding for major strategic infrastructure projects on which further development can be stimulated.

We still believe there are fundamental institutional weaknesses Local Authorities are faces in terms of resources and expertise which must be addressed or reinforced by central funding or support – particularly as authorities begin to wield greater power over their budgets and through London's devolved powers. The Government's own Housing White Paper highlights the particular problem of recruiting and retaining planners and other specialist skills. These problems are acute and very evident in Revo members' dealings with planning departments across the country. These problems are a direct result of the halving of planning departments budgets since 2009/10 in the face of other local budgetary priorities. This in turn causes significant delays in decision-taking and policy-making and unnecessarily deters investment in all sectors of the economy. We continue to make representations to the Government on this issue but the Mayor's Office, within the powers and resources available to it, should assist those boroughs with deficiencies to achieve the vision the London Plan seeks to aspire.

Revo also recognises the need to deal with construction skills shortages; and the need to tackle delays caused by planning conditions and to simplify developer contributions. Investment in universities, colleges and technical skills must focus on raising skills and addressing skills shortages. By virtue of their location, education and business clusters can also be the focal point around which sustainable development and skilled communities can grow, and other institutions be encouraged to locate. London can help to lead the way for the rest of the UK.

We are also ready to work with the Mayor's office to find ways to solve the current skills shortages, and through our Educational Trust have a number of programmes being delivered and in development that improve the skills of current employees, and bring new people into our dynamic and diverse sector. An area of focus for Revo at present is to work to build greater capacity in Local Authorities, support upskilling of local authorities, and empower civic leadership to enable sustainable development in the built environment.

User: London NHS Clinical Commissioning Group

Funding the London Plan - Policy DF1 Delivery of the Plan and Planning Obligations

As presently worded, clause D appears to give second priority to the provision of health infrastructure on large sites after affordable housing and public transport improvements. We suggest that when setting planning obligations policies boroughs should address strategic as well as local priorities in planning obligations. In the instance where planning obligations cannot viably be supported by a specific development, then no priority should be stated and each planning application should be addressed on its merits.

We suggest that Clause D is amended to read ‘When setting policies seeking planning obligations in local Development Plan Documents boroughs should have regard to the full scope of infrastructure and requirements which may be required to ensure a scheme is acceptable in planning terms and contributes to sustainable development’.

The existing London Plan Policy 8.2 F provides clear guidance to boroughs and it is suggested that this approach is maintained in the new London Plan.

We agree that large sites have an important role to play in delivering necessary health infrastructure as a s106 or CIL payment in kind, however, the supporting test should acknowledge that a s106 in kind health facility provided as shell and core let to the NHS at a market rent is in fact a commercial arrangement and not a planning obligation. We also suggest that the importance of all sites being actively considered for social infrastructure should be incorporated in other policies, as appropriate, to ensure that opportunities are not missed.

User: London NHS Clinical Commissioning Group

The Funding Gap - Health Facilities

We welcome the reference in paragraph 11.1.37 to the HUDU Model to help calculate infrastructure requirements and costs and developer contributions. It is vital that the NHS continues to receive a commensurate share of s106 and CIL developer contributions to mitigate the impacts of growth and help deliver transformation plans. Paragraph 11.1.40 recognises that developer contributions and the NHS England Estates and Technology Transformation Fund only represent a small proportion of the capital required to deliver modern and fit for purpose infrastructure with additional sources of funding required. The release of value from the reconfiguration and disposal of sites will be important in contributing to closing this funding gap. The flexibility sought in relation to provision of affordable housing across a portfolio of sites will be crucial.

User:	Kingston and Surbiton Constituency Labour Party

We note that this is heavily dependent on the Treasury, and deplore the bad faith of Tory-controlled councils which dismiss the Plan on the grounds of lack of funding.

User: CPRE London

Funding to improve green space

The provision and improvement of green space requires funding to help deliver the Mayor's aspirations for 'good growth' and increasing London's green cover and should be addressed in Policy DF1.

Proposed change: Policy DF1 D (2) should be amended to read as follows:

'Recognise the importance of affordable workspace and culture and leisure facilities, **including public green and open space,** in delivering good growth.'

Rationale: Planning obligations and a proportion of Community Infrastructure Levy should go towards improving parks and green spaces. Where there is major development, in particular close to parks or green spaces, there ought to be a contribution by developers towards improving the quality, including enhancing the tranquillity, of green space, and to help fund future management, for example via an endowment.

User: British Property Federation

An ambitious London plan will require significant investment for the policies to take real effect. However, the structure of funding for public projects is complex, particularly in relation to transport infrastructure funding. Whilst the Mayor controls a variety of funding sources (including MCIL2 & business rate retention from 2018/19) for strategic infrastructure investment, a significant amount of funding will be necessary from central government. We therefore urge the Mayor to continue to lobby central government to provide the necessary funding for Crossrail 2 and other major strategic infrastructure projects. Only then will the London Plan be able to fully capitalise on the capital's potential for growth and greater housing delivery.

We note that this section of the plan also sets out a proposal for the GLA to share in land value capture (LVC) from public assets. As LVC occurs in many different forms, the Federation does not have a blanket position in this area. However, we believe a critical consideration for all forms of LVC is whether it encourages overall productivity and growth. A LVC mechanism which stifles development activity and growth for the sake of tax take is unlikely to meet this outcome. We hope that this point will be taken into consideration by the Government, GLA and TFL Joint Task force which is set to explore this issue in more detail. We have recently submitted evidence to the HCLG Select Committee, which sets out our position further on LVC and is more specific on its various forms.

A further option for raising funds set out by the Mayor is to accept the London Finance Commission's recommendations for the full devolution of property taxes, business rates and stamp duty. The BPF supports the general principle of greater devolution of finances and decision-making powers to cities. We look forward to hearing more detail on this option before we comment further.

User:	Business for London

The Funding Gap. The Plan recognises that there is a funding gap and will not be implemented without the need for more funding. There are also concerns that private sector investment will not be sufficient to achieve all of the Plan's policies. This needs to be addressed In the final London Plan as it needs to be robust and deliverable under a variety of different market conditions. Failure to make sure the Plan is deliverable will mean that London's World City status could be threatened.

User:	Claire Mellish

The provision and improvement of green space requires funding to help deliver the Mayor’s aspirations for ‘good growth’ and increasing London’s green cover and should be addressed in Policy DF1. Proposed change: Policy DF1 D (2) should be amended to read as follows: ‘Recognise the importance of affordable workspace and culture and leisure facilities, including public green and open space, in delivering good growth.’

User: Town and Country Planning Association

Policy DF1 Delivery of the Plan and Planning Obligations

3.9.1 The TCPA supports this chapter on ‘Funding the plan’ and the overarching policy DF1 however as recommended in paragraph 2.7 of this submission it could be strengthened and refocused as a chapter on ‘***Implementing the Plan***’ setting out how the GLA will work with the Boroughs, developers and investors to implement the Plan including:

- supporting community engagement to ensure that local communities are involved in planning change,
- ensuing that schemes are in line with community needs and expectations,
- capturing land value uplift; and
- developing strategic relationships with major infrastructure providers.

The success of this Chapter will be vital to supporting the growth of London.

User: Uttlesford District Council

Policy H3 (Monitoring housing targets) requires net housing delivery to be monitored against the housing targets in the draft London Plan. Uttlesford District Council supports the need for regular monitoring of housing delivery. However, supporting text to this Policy suggests that London should not be subject to the Government's proposed housing delivery test if development stalls for non-planning reasons and is unable to contribute to delivery of new housing. Uttlesford District Council is sympathetic to this argument. However, the Monitoring Framework and Key Performance Indicators (Policy M1 and associated Table 12.1) do not say what measures will be put in place should the housing targets not be met on a consistent basis. A proactive approach to the identification of alternative sites and opportunities, and the use of mechanisms to unblock stalled schemes would be required. Uttlesford District Council is thus pleased to see reference to such an approach as outlined in paragraphs 11.1.17 to 11.1.25 of the draft London Plan, however the actions that would be taken should be made clear.

The concern with this for Uttlesford is that if the housing figures in the draft London Plan are not met, for whatever reasons (e.g: London Boroughs do not allocate land for housing in their Local Plans to meet the housing figures, or that development densities achieved are lower than that assumed in the SHLAA etc), then London will be left with a 'short-fall'. The question is thus how and where this will be made up. In particular, the housing market in Uttlesford is influenced by London's housing market and thus need in Uttlesford will be affected by any shortfalls in London. This needs to be considered and planned for at the strategic level. This is emphasised by inclusion of Uttlesford within the 'London Functional Urban Area'[1].

[1] The 'London Functional Urban Area' includes all those districts and boroughs outside of London where at least ten percent of employed residents commute to areas of high employment density (e.g.: central London). See Brown, R. Eden, S and Bosetti, N, for Centre for London and Southern Policy Centre, January 2018, Next-door Neighbours – collaborative working across the London boundary

User: Crest Nicholson PLC

We consider this Policy to be unsound as currently drafted and amendments are required.

We concur with the HBF's representations and proposed re-wording to Part A to read as follows to ensure the necessary flexibility is provided to Boroughs to achieve the aims that are prioritized by the Draft London Plan including affordable housing.

Part A should be re-worded to read:

"Applicants should take account of Development Plan policies when developing proposals and acquiring land. While the priority for planning obligations is affordable housing and contributions to necessary public transport improvements, Boroughs will need to be flexible in the pursuit to other policy objectives and have careful regard to the viability of schemes and to ensure that housing targets are achieved."

Paragraphs 11.1.63, 11.1.64 and 11.1.65 all refer to the Mayors desire to share land value uplift. We consider it in appropriate for the Draft London Plan to include reference to land value uplift given London already benefits from the imposition of Mayoral CIL, locally imposed CIL and section 106 funding contributions.

User: Orbit

Orbit is pleased to see the recognition within Chapter 11 that there is a need for significant public-sector investment to deliver the ambitions of the Plan. As has been stated throughout these representations, increased investment in transport infrastructure will be vital to achieve the growth potential of areas in Bexley such as Belvedere, Erith and Slade Green.

Policy DF1 sets out a new approach to viability testing of developments and it is a positive approach to restrict viability testing to sites that have clear barriers to delivery. It is welcomed that the policy recognises that this includes areas “where value generated is exceptionally low”. This is particularly important as, by definition, these are areas which could meet a need for affordable outright sale homes, but where it is crucial that low values do not drive down quality or dilute place-making ambitions. To attract Londoners to live in the lower value areas the offer must be for high quality homes, green spaces and social infrastructure supported by improved public transport. Therefore either additional subsidy or reduction in other contributions are necessary to promote significant housing in these most affordable areas.

It is disappointing that there is no recognition within this chapter to the special case of funding for Estate Regeneration. To improve the homes and health of existing social tenants through estate regeneration in low value areas is extremely challenging financially and this should be recognised specifically here.

Orbit supports the statement in draft supporting paragraph 11.1.18 to expand the range of delivery models and the tenures and types of homes delivered. Housing Associations such as Orbit are well placed to help achieve this ambition. Orbit is committed to providing a full range of tenures and housing options for all and that these should be in mixed and balanced communities with no distinction in the homes on offer just dependent on how a family is paying for their home.

User:	Mr Paul McQuillen

The provision and improvement of green space requires funding to help deliver the Mayor's aspirations for 'good growth' and increasing London's green cover and should be addressed in Policy DF1. **Proposed change:** Policy DF1 D (2) should be amended to read as follows: 'Recognise the importance of affordable workspace and culture and leisure facilities, **including public green and open space,** in delivering good growth.'

User: Owners and Tenants of Cygnus Business Park

Policy DF1: Delivery of the Plan and Planning Obligations

4.13 Part A of this policy states that applicants should account for development plan polices when bringing forward proposals for development and that site specific viability testing should be the exception rather than the norm. This is contrary to national policy. The Framework is clear that planning obligations should be used where they make a development acceptable and not as a means to delay or frustrate it - paragraph 205. Decision-takers are encouraged to approach decision-taking in a positive way at paragraph 186.

4.14 This is also reflected in the NPPG at paragraph 006 (Ref ID: 23b-006-20140306) which states that local planning authorities should be flexible in their planning obligations requirements. While we appreciate the theory that land-owners and developers should factor-in the cost of development plans policies national policy is not that decision-takers should adopt by default a stance of inflexibility when determining planning applications.

4.15 Whilst Planning for the Right Homes in the Right Places has identified this as a potential policy approach it is not appropriate for the Mayor to anticipate national policy or predicate this Plan on his expectation of national policy which may not be applied.

4.16 The London Plan and Local Plans should be supported by viability assessments. These can only ever provide a very general view of what might be viable over the plan period. In the case of the draft London Plan this is a 22-year period which covers a very large area with necessarily wide differences occurring or likely to occur by location and time. The London Plan Viability Study, December 2017, recognises this, concluding at paragraph 14.3.1 that the diversity of the London market means that viability varies across the City.

4.17 To achieve the Mayor's housing targets will require greater not less flexibility, otherwise the Plan risks being wholly self-defeating.

4.18 Part A of this policy is therefore unsound because it is contrary to national policy and should therefore be re-worded to read:

A. Applicants should take account of development plan policies when developing proposals and acquiring land. <u>While the priority for planning obligations is affordable housing and contributions to necessary public transport improvements, Boroughs will need to be flexible in the pursuit to other policy objectives and have careful regard to the viability of schemes especially to ensure that housing targets are achieved.</u>

User: CFGN Community Food Growers Network

CFGN supports the following proposal to the New London Plan, as drafted by Granville Community Kitchen:

Chapter 11 Funding the London Plan

DF1 D and E

Recommendation:

D should read:

When setting policies seeking planning obligations in local Development Plan Documents and in situations where it has been demonstrated that planning obligations cannot viably be supported by a specific development, applicants and decision-makers should look at the project as whole in delivering all the Good Growth objectives while recognising 1) the role large sites can play in delivering necessary health and education infrastructure; and 2) the importance of affordable workspace and culture and leisure facilities in delivering good growth.

REMOVE Section E

The financial basis for all the projects in the London Plan seems to be S106 and CIL money. This will tend toward a building of private housing as this is where these monies are raised. It may lead to low level corruption, such as the ignoring of residents wishes because this can become one of the few ways Local Authorities can raise money. This is untenable and is incomparable with much of the London Plan itself including policies GG2 (Making the best use of land), GG3 (Creating a Healthy City), GG4 (Delivering the homes Londoners need), GG5 (Growing a good economy) and GG6 (Increasing efficiency and resilience).

User: Persimmon Homes

Part A is unsound because it is contrary to national policy.

Part A states that applicants should account for Development Plan polices (i.e. the London Plan and the Local Plan) when developing proposals and acquiring land. Site specific viability testing should be the exception rather than the norm. As detailed in the HBF reps, this is contrary to national policy (NPPF para 205, 173 and NPPG Para 006 (Ref ID: 23b-006-20140306)) which recognises the need for flexibility in the application of policy and have regards to viability to ensure competitive returns.

The Mayor's approach is to expect that all the aspirations and requirements of the plan can be met and if they cannot, this is a result of decisions made during option or land acquisition. Clearly a significant number of options / land acquisitions for residential development will have been made before the publication of the draft plan. In addition, it ignores the realities of development which need to have regards to alternative use values, competitive returns and having a willing landowner.

The NPPF (Para 173-174) recognises the need to assess the likely cumulative impacts of 'all existing and proposed local standards, supplementary planning documents and policies that support the development plan, when added to nationally required standards'. The London Plan Viability Study, December 2017 recognises that individual schemes will face viability challenges (14.3.1). We are concerned that this draft London Plan adds a number of additional costs and tiers of complexity to the existing London Plan. This is at odds with the desire to lift the bureaucratic burden and increase housing delivery.

We support the HBF's recommendation that Part A is re-worded to read:

“Applicants should take account of Development Plan policies when developing proposals and acquiring land. While the priority for planning obligations is affordable housing and contributions to necessary public transport improvements, Boroughs will need to be flexible in the pursuit to other policy objectives and have careful regard to the viability of schemes and to ensure that housing targets are achieved.”

User: Ms Deirdre Woods

DF1 D and E

The London Plan says:

D

When setting policies seeking planning obligations in local Development Plan Documents and in situations where it has been demonstrated that planning obligations cannot viably be supported by a specific development, applicants and decision-makers should firstly apply priority to affordable housing and necessary public transport improvements, and following this: 1) Recognise the role large sites can play in delivering necessary health and education infrastructure; and 2) Recognise the importance of affordable workspace and culture and leisure facilities in delivering good growth.

E

Boroughs are also encouraged to take account of part D in developing their Community Infrastructure Levy Charging Schedule and Regulation 123 list.

This should read:

When setting policies seeking planning obligations in local Development Plan Documents and in situations where it has been demonstrated that planning obligations cannot viably be supported by a specific development, applicants and decision-makers should look at the project as whole in delivering all the Good Growth objectives while recognising 1) the role large sites can play in delivering necessary health and education infrastructure; and 2) the importance of affordable workspace and culture and leisure facilities in delivering good growth.

REMOVE Section E

The financial basis for all the projects in the London Plan seems to be S106 and CIL money. This will tend toward a building of private housing as this is where these monies are raised. It may lead to low level corruption, such as the ignoring of residents wishes because this can become one of the few ways Local Authorities can raise money.

This is untenable and is incomparable with much of the London Plan itself including policies GG2 (Making the best use of land), GG3 (Creating a Healthy City), GG4 (Delivering the homes Londoners need), GG5 (Growing a good economy) and GG6 (Increasing efficiency and resilience).

User: London Borough of Newham

Policy DF1 Delivery of the Plan and Planning Obligations

In general LBN are supportive of this policy and it is deemed to be complementary to Newham's Draft Revised Local Plan.

However, policy DF1 prioritises affordable housing and strategic transport over other infrastructure. It is not considered that this is necessarily the most effective approach due to the broad range of variables in any development proposal. It is recommended that consideration is given to assessing the need on a case by case basis.

There are also concerns about whether the current mechanisms for ensuring the provision of infrastructure are sufficient. The GLA, and LBN have identified a significant funding gap for infrastructure projects and scheme viability cannot be expected to bear it all. It is therefore suggested that alternative options are explored to fill the funding gap. Joint working on the forward funding potential of business rates retention is underway; greater flexibilities over right to buy receipts and Housing Revenue Account (HRA) borrowing should also be the focus of discussions with the Treasury.

User:	Bexley Natural Environment Forum

BNEF supports the contents of Paragraphs 11.1.45 – 50, however, this would require an understanding from councils, both councillors and officers, as to the value that green infrastructure brings and the advantages accrued from such effects. Unfortunately, this is something that is sadly lacking at the current time, and one that I am afraid in my experience many councillors, in particular, show no interest in or making an effort to understand them.

User: CIBSE

This is not a core area of expertise of CIBSE and we cannot therefore comment in detail. We are however aware of the following feedback on viability assessments: a lack of transparency and clarity on the methodology makes their review by planning authorities difficult; and: the declared land value, or the price at which land was purchased, may not take full account of all planning policies (especially those on affordable housing provision), resulting in higher declared land prices, these prices then being used in viability assessments as evidence that policies cannot "viably" be met37. We would therefore support the intent of policy DF1-A which requires London Plan policies to be taken into account when acquiring land, as this could help towards achieving higher standards without necessarily resulting in increased overall costs, in particular housing costs.

This would also be helped if there were strong signals that essential policies will consistency be applied, with essential parts of the policies worded unambiguously wherever possible (e.g. using wording such as applicants "should" or "must" rather than "are encouraged to") and therefore need to be incorporated into land values and development proposals38.

User: London Friends of Greenspaces Network

20. DF1 The provision, maintenance and improvement of green space requires substantial funding to help deliver its universally-accepted wide-ranging essential benefits, including the Mayor's aspirations for 'good growth' and increasing London's green cover, and should be addressed in Policy DF1.
Proposed changes:

Policy DF1 D should be amended to delete at the end 'firstly' , 'priority' and 'and following this'. It is suggested that 'affordable housing and necessary public transport improvements' be moved down to become one of three 1), 2), 3) sub-paras.

Policy DF1 D (2) should be amended to read as follows: 'Recognise the importance of affordable workspace and culture and leisure facilities, including public green and open space, in delivering good growth.'

Rationale: Planning obligations and a proportion of Community Infrastructure Levy should go towards improving parks and green spaces. Where there is major development, in particular close to parks or green spaces, there ought to be a contribution by developers towards improving the quality, including enhancing the tranquillity, of green space, and to help fund future management, for example via an endowment.

User: National Health Services England, National Health Services Improvement, Community Health Partnerships.

Policy DF1 (Delivery of the plan and planning obligations) states that viability testing should only be undertaken in relation to specific development proposals where there are “clear circumstances creating barriers to delivery”. It is expected that development plan policies should be taken into account when land is acquired and proposals worked-up, to ensure that the prices paid for land reflect policy requirements, like those relating to affordable housing provision, and prevent such policy requirements from later rendering development proposals unviable.

The NHS has a development programme aimed at delivering the healthcare facilities that London needs. In many cases the NHS needs to raise funding to deliver new and improved healthcare facilities through the redevelopment of existing property to provide other uses, such as residential, as well as healthcare facilities. In such cases, the other uses would create value and be used to fund costly healthcare facilities. In most cases, healthcare facilities require very significant capital investment and add significant costs to development, eating away at the ability for the development proposal to remain viable whilst also providing other mitigation, such as affordable housing.

Whilst we believe that the need for a development to fund the delivery of new or improved healthcare infrastructure would constitute a clear circumstance creating a barrier to delivery, we believe that wording should be added to the supporting text for Policy DF1, which sets out examples of such circumstances, making this clear.

Failure to provide such a clarification would result in Policy DF1 being subject to misinterpretation. This could result in the NHS facing barriers to the delivery of enabling development that is needed to facilitate the provision of new and improved healthcare facilities. It could also create barriers to the delivery of housing, if viability reasons were to prevent the enabling development associated within new and improved healthcare facilities from coming forward.

11.3. We suggest the following revised wording for Paragraph 11.1.4: In setting Local Plan policies and associated guidance, boroughs should consider whether there are circumstances in which it may be acceptable to review the viability of a development on a site-specific basis. These may include circumstances where an applicant is required to provide significant infrastructure improvements to facilitate delivery of a development (beyond the level that would typically be required for the scale of development), where the development would enable new or improved infrastructure (such as healthcare facilities) or where the value generated by a development would be exceptionally low.

User: Workspace Providers Board

Setting targets (KPIs and Policy DF1)

We note the Key Performance Indicator on affordable workspace, which expects an increase in affordable workspace as a proportion of all office space. However we note that this will be difficult to monitor without a universal definition of what is “affordable” and difficult to achieve without targets for what percentage of new development should be affordable workspace.

We advocate that the Mayor introduces targets for affordable workspace or low cost business space for boroughs and/or defined areas (e.g. Creative Enterprise Zones). This is likely to be a critical measure in ensuring that affordable workspace is more frequently prioritised and delivered within new development schemes at a local level, particularly where there are targets for housing.

Housing targets are based on population trends. Workspace targets should look at the number of people who need workspace. The Workspace Providers Board would commit our time and expertise should the GLA commit to developing evidence to support the development of quantifiable targets.

We support the inclusion of affordable workspace in Policy DF1 on planning obligations, and understand the prioritisation of affordable housing, transport and other social infrastructure in general terms. Although in certain circumstances or specific locations affordable workspace can be very important too. We therefore suggest the addition of “in specific locations” to Policy DF1 Part D 2).

User: Local London Partnership

Deliverability

This concern touches on the issue of whether the Plan is sound and, in particular, if the Policies are justified and likely to be effective. We are concerned that the Plan may not be capable of meeting the objectives spelt out in the Policies for Good Growth. We are mindful of the statement made by the Deputy Mayor for Planning, Regeneration and Skills at the London Assembly Planning Committee in answer to a question about what he Plan will deliver. *"I think it will if this blueprint is followed, because that is what it is. It is a blueprint for how it can be done, and I come back to my earlier point about the funding. If we cannot either get fiscal devolution or if the Government, alternatively, does not step back into the space of subsidising social infrastructure to levels that it was previously or approaching those levels, if all we are left with is trying to tax developments to deliver all of this, then, no, I do not think we will deliver it. However, as I say, it is a blueprint to show how it can be done and how we think growth can be handled well, including a chapter of what we think needs to be funded to be able to deliver this."* These funding needs are spelt out in Chapter 11. The chapter deals particularly with the increased investment in infrastructure and fundamental changes to the housing market needed to achieve the step change in housing delivery envisaged in the Plan. The significant need to invest in enabling infrastructure, water, energy, waste, digital connectivity and social infrastructure is also referenced. The public sector funding gap is particularly emphasised (para 11.1.8). Funding the infrastructure to support growth is a necessary prerequisite to achieve Good Growth in the Local London area.

Our concern is that these investments are dependent on public policy decisions by Government which are outside and independent of the Plan making process but are stated to be key to the delivery the London Plan policies. This makes the whole Plan uncertain. In Local London there is particular concern that the investment in public transport infrastructure required to enable Good Growth will not be forthcoming, or at least not at the same pace as housing provision, leading to adverse impacts on the Plan's Policies for Good Growth. A lack of new public transport provision will lead to greater use of motor vehicles for trips and increased road congestion, particularly in outer London, with adverse impacts people's ability to move around the City (Policy GG1/A), on health through increased pollution (Policy GG3/A) and on transport provision (Policy GG5/G) and Policy T3

User: Socialist Health Association London

As previously stated, we applaud the expansion of the determinants of health categories to include a much wider reach in the London Plan, however we ask you to note that the word INTEGRATION has been misappropriated by central government.

The promised funding for improving and expanding community provision has not been forthcoming – for instance, only 2 district nurses were trained last year. Meanwhile they continue to plan for further downsizing of an already drastically underfunded and under resourced NHS at all levels – including mental health, which has experienced severe cuts with young people having to travel hundreds of miles from home to obtain crisis care or even being held in police cells. Waiting lists for CAMHS, which used to offer early intervention, are now lengthy and often too late to prevent crisis.

Any planned downgrading or downsizing of health provision in the face of a significantly increasing population is to be protested.

When we refer to integration, we mean the best means of rescuing social care to bring it into alignment with the NHS as a national service, funded and free at the point of need via taxation.

When the government refer to integration, they mean integration of the private sector as we have now seen in almost every facet of health function via Section 75 of the Health & Social Care Act.

This must be addressed by City Hall – instead of signing up to this disaster we need you to CHALLENGE as so many others are doing in the London health sector and local authorities. Please listen to those who understand the abject danger these plans hold for the capital and indeed how they will completely undermine so much of what you aim for in terms of a healthy London. If you do not do so you will let London and Londoners down very badly.

We all know that Social Care is in crisis. It is now well recognised that the near obliteration of dedicated social care funding has had a disastrous impact on the use of hospital beds – councils, already subject to significant cuts of even as much as 60% of their 2010 budgets are now using budgets designated for other functions to provide what are in effect skeleton social care services and families are suffering badly as a result.

City Hall must urgently press the government for additional funding

The social care sector is also on the brink of a staffing precipice due to the numbers of these workers who come from the EU – they do not earn more than £35k and are not in a protected occupation. **City Hall must press the government on this point.**

The nursing sector is also similarly impacted.

According to Royal College of Nursing (Feb 2018) FOI figures show that the number of vacant nursing posts in the Capital is now over 12,719, up from 10,1140 in 2015.

The end of the nursing bursary and an unaffordable housing stock has already had a dreadful impact and Brexit is significantly adding to the problem.

City Hall must press the government on this point.

User:	Socialist Health Association London
>> we seek more information on the London Healthy Urban Development Unit Planning Contributions Model (HUDU Model)	

User:	Socialist Health Association London

A specific fund for Primary care estate, the Estates and Technology Transformation Fund (ETTF) is in the second of a four-year programme (to 2020).

We would definitely like to see 106 PG being utilised for local health projects as long as any money generated then goes back into the community, rather than to private corporations eg. we would not be happy with Virgin etc benefiting from this!

User: Socialist Health Association London

>> *CLEARLY THE ABOVE IS OUT OF DATE* <<

With reference to the above, we are very disappointed that City Hall has signed up to the STP re-configuration which is acknowledged by most people involved in the health sector as well as leading local authorities in London to be a disaster.

Additionally, since the document was written, there has been a rapid shift from STP's to the development of ACO's or equivalent financial structures rebranded as Integrated Care Systems . Successful moves in the High Court to demand parliamentary scrutiny before STPs/ACOs/ ICO's can be signed off are for very good reason

What is more – a good number of London's councils have heavily rejected these re-configuration models for a very obvious reason :

They will not improve the health of their population – quite the opposite.

North West London Plan was rejected by Hammersmith & Fulham and Ealing Councils, building as it did on the so-called Building a Healthier Future Plan which was soon shown to be set to result in quite the opposite. Just this week, Shadow Secretary of State for Health, Jonathan Ashworth flagged up the dangers with both this plan and its latest incarnation the ACO and ICO. He stated that it would be extremely dangerous to close Charing X Hospital either now or in 2021 (which is the current end point ie precipice used by Imperial and the local CCG) and endorsed the analysis within both the Mansfield Commission inquiry ' Health and Social Care in North West London' – a review of Shaping a Healthier Future and the North West London STP – as well as by local Save our Hospital campaigns.

With a projected population increase of 20,000 in the area, it is nonsense to suggest that a loss of 500 beds and 800 staff (acknowledged as being true in an Imperial Board meeting where this evidence was presented) is going to support a healthier population.

In addition, we know that the original plans were worked up by the previous Conservative led ‘Cameron flagship’ local authority with a view to selling off most of the Charing X site to develop luxury flats and more of the same planned on other sites. Lately, Imperial NHS Trust have added beds due to their struggle to cope. We are told the ‘no closure’ approach will all be in place until 2021 – but then what.....

As a result of these plans, the hospitals have hit a traditional malaise which affects provision under threat in terms of staff recruitment, services in decline and generally poor morale (as identified by the last CQC report). Maternity Services at St Mary’s Paddington have deteriorated into Requires Improvement from Good – and this also impacts on mothers and babies from the recently closed unit in Ealing**.**

This does not benefit anyone. Although it is obviously not City Hall’s job to run hospitals in the way the devolved model in Manchester involves, the Mayor of London has a duty to the health of Londoners and can usefully support the need for maintaining sufficient health infrastructure in the capital.

The UK has already lost 50% of hospital beds since1990 and is thus considerably under resourced. The UK lags behind European counterpart economies in terms of %GDP invested in health as well as provision – and even then, spend is currently dropping at a rate of 0.3% per person.

East London Plans have been critically examined and found seriously inadequate by a report from the Centre for Health and Public Interest (attached)

On that basis the 3 local authorities concerned did not sign up to the Transforming Services Together Document (inner boroughs) nor to the North East London STP which covers the 7 Outer North East London Boroughs – City of London Corporation; Hackney; Barking & Dagenham; Havering; Newham; Redbridge; Tower Hamlets; Waltham Forest

Within the North East London Plan is included the re-structure (i.e closure to blue light ambulance cases and transformation to Walk in Centre) the A+E dept and closure of 270 acute beds at King George Hospital Ilford, despite predicted local population growth of 345,000 by 2021. This is an equation which does not add up in any way.

Councils in the other two areas – SE and SW have also quizzed and queried those plans and none have been fully ratified.

Please note also – the STP clause is now completely out of date. The government shifted these to **Accountable Care Organisations** (ACO's) file:///C:/Users/Jos%20Bell/Downloads/Accountable-care-systems-briefing.pdf and then, when these were revealed by Shadow Secretary of State for Health Jon Ashworth and many health experts to be dangerous and unworkable 'Trojan Horses for Privatisation' – which has not only been taken up in a legal case involving Prof Allyson Pollack and Stephen Hawking no less, but also has caused Jeremy Hunt to call a pause in their roll-out. http://www.nationalhealthexecutive.com/Health-Care-News/hunt-to-pause-accountable-care-roll-out-after-mps-voice-great-deal-of-concern

However those of us who watch Jeremy Hunt's every move (almost) have spotted that he suddenly change the term to **Integrated Care Systems** - none of these terms is honest. STPs did not offer sustainable health provision, ACO's are not accountable and integrated in this context protects neither the NHS, social care or anyone who needs or works in either. **We urge City Hall to take a look at what is really planned and challenge these dangerous constructs along with the PLP.**

ICOs are dangerous in several ways. Contracts are long-10-15 years, making it easier for the government to hand over NHS services wholesale to the private sector and making reinstatement of a locally accountable service difficult and protracted; they do not offer comprehensive care to a local population but specified care for those individually signed up through their GP- those off lists or moved off lists because they are most costly, are the most vulnerable; they devolve medico-legal accountability away from the NHS for the first time, and they employ staff on a different basis not bound to NHS terms and conditions including pension rights.

ICOs are relatively simple to convert into an insurance based health care delivery vehicle- the failed US model- where those at relatively lower of serious and chronic conditions requiring costly and ongoing care, can band together to pay insurance fees for care of a limited kind.

Women's health too must be given particular attention with the restructuring of maternity provision and sexual health services in proposed STPs/ACOs – with already the loss of some beds such as in Ealing, and measures which put the health of mothers and babies at risk. The recent CQC report on maternity services at St Mary's Paddington which shows a slide to Requires Improvement is a key indicator of the risks in this regard.

Imperial College NHS Health Trust is in rapidly increasing deficit and has pretty much declared the local STP/ACO etc plan to be undeliverable, and is now looking for its third CEOs in almost as many months.
file:///C:/Users/Jos%20Bell/Downloads/Public%20Trust%20board%20papers%2031%20January%202018.pdf

Sir Bob Kerslake, the former head of the Civil Service and much respected Chair of King's College NHS Trust recently resigned saying 'it cannot be done!'

https://www.kingsfund.org.uk/projects/nhs-in-a-nutshell/trusts-deficit

These are key signs that the government's austerity strategy is at complete variance with any form of good health management. We ask that the Mayor highlights this, rather than sign up to a London Plan which just seems to nod through STPs and the like.

The public will not thank a City Hall which does not take this on.

Nor is any of this is being offset by the community improvements which were promised as many proposals for alternative home care for all but the sickest patients emerged as being unrealistic in terms of resourcing.

In terms of **Social Care** funding cuts via Central Government cuts cannot always be the main reason/excuse for local councils not fulfilling their duties –it is certainly true for some who have experienced cuts of 60%, but London contains other councils such as worst offender Kensington & Chelsea which has runs itself like a 'bank on steroids', sitting on huge reserves and spending an 'eyewatering £250,000 on paintings....' rather than attend to civic duties - and which has resulted in the worst health inequality in the country and the horrific disaster at Grenfell Tower.

Emma Dent Coad MP's report After Grenfell highlights the damage this ideology has done to the borough. Her report on Social Care will be published shortly. Prelude :

The state of social care in Kensington and Chelsea is a classic example of how a casino economy is incompatible with health equality. Kensington and Chelsea Council has outsourced all care facilities, despite the fact that they ran a budget surplus year on year due to underspending. Many facilities were soon handed a default notice as they were unable to fulfil basic standards due to poor staffing.

The issues relating to an aging population are only part of the problem – and improving public health is most definitely a very relevant target which needs to be properly resourced, planned and delivered with coherent KPIs.

For those councils who have lost so much central government that they are keeping social care afloat by taking non ring fenced funds from other duties – including public health. This is negatively impacting on any form of a healthy ethos for said boroughs.

The London Plan should be echoing these voices of experience, and challenging the government, not including a section which reads as though it accepts/approves

Secretary of State Hunt’s damaging measures.

For these reasons it is obvious that City Hall should be challenging these models all the way down the line, rather than signing tacit approval to them in this key document for the future.

User: Socialist Health Association London

We are deeply concerned that central government is subjecting the public sector to such extreme financial cuts and constraints in an ideological pursuit of low taxation and minimal public services.

We are deeply concerned by the funding shortfall cited in the London Plan and will support City Hall in any endeavours to obtain a fair funding allocation for London.

We are at the same time deeply concerned about the stated aim to sell off NHS land in London without any detail or consultation. What does this mean? Does this relate to buildings currently in use? Does this relate to assets which could be put to better use for the health and wellbeing of Londoners rather than a sell off? Has any consideration been given to London's expanding population in this context? What are the plans for the land? Who will scrutinise this? Will the funds achieved by any sale be invested in dedicated health projects?

We would strongly recommend that the best use of unused NHS buildings in the capital is firstly to explore the potential for renovating buildings into housing stock for medical students, nurses and other medical workers, including paramedics. Thus the dearth of key worker homes can be addressed under the aegis of NHS estates which is surely a good priority solution to the matter.

We would also strongly advocate the approach taken by the Sure Start programme, which is holistic in nature and not only looks after the education, play, health and wellbeing of pre-school children but also parents and families too. Nationally, more than 500 centres have been dismantled due to central government funding cuts, but some local authorities are managing to keep at least a proportion of these going. These can also be linked up with local GP surgeries, libraries etc. Our Chair previously worked with Prof Sir Norman Glass and developed / evaluated 32 Sure Starts so we are very conversant with the benefits of the model.

At the same time we are also deeply concerned by the recent appearance of DWP 'advice' personnel being based in libraries. Given the current regime at the DWP, this is highly inappropriate use of community space.

We also draw your attention to the intergenerational work of United of All Ages, where the health and wellbeing benefits of multi-purpose sites offering childcare in older people's settings are fast emerging.

You will recall that Jeremy Hunt wanted to sell off 60% Lewisham Hospital land which quickly resulted in the highly informed and effective Save Lewisham Hospital Campaign. Quite simply, this would have resulted in the closure of the hospital and endangered thousands, resulting in just one A&E for 750,000 people with resultant extreme pressures on neighbouring hospitals – just as has already happened at Northwick Park following the closures at Hammersmith & Central Middx. Thankfully the High Court and the Court of Appeal noted in the first instance that Hunt acted unlawfully but the method of his consultation also emerged to be insufficient and even duplicitous.

In order to prevent these situations being repeated, we strongly recommend that before any NHS land assets are sold off, we ask that these are mapped out for consultation with local communities to ensure best use – initially at least to explore the following :

- step-down care to relieve pressure on expensive clinical beds by patients who are no longer in need of in-patient treatment.
- residential accommodation for medical staff, to help recruitment and relieve housing need,
- the construction of older peoples' homes, helpfully co-located near health care,
- the future expansion of health premises,
- social housing.

All these uses would generate more income in the long run for the NHS or the public sector than the once-only receipt of land sale money, and so offer better value for money."

Overall, the key is surely to repeatedly challenge the government – not sign up to their plans which are essentially designed purely to dismantle the NHS.

In 2012 we knew that the Health and Social Care Act would be a disaster. This report was written by our Chair https://www.scribd.com/document/81678939/Breaking-the-Nhs-through-Reckless-Reforms

Three years ago we knew that this emergency was pending – and many of our members input into the inquiry which resulted in London's Health at the Crossroads https://www.healthemergency.org.uk/peoplesinquiry/pdf/SecondReport.pdf

We ask that City Hall supports us in Labour Party health policy which is statedly focused on overturning the Health and Social Care Act, reinstating the NHS to original principles in the way it functions and also helps us to offset the Tory scheme to dismantle our NHS infrastructure rather than support the Hunt approach as seems to be the case in the current version of the London Plan.

You will also please note that the Health Motion and speech which we presented to London Regional Conference, which was unanimously adopted, particularly cited the need to safeguard NHS sites. (See addendum)

We also endorse the Enfield Southgate CLP paper which goes into this in more technical detail with expert input from Jeff Lever, South Bank University expert in land management.

Sir Robert Naylor's report on the future of NHS land1 revealed that years of careless reorganisation and neglect have left the NHS without a national estate strategy, and lacking the capability to create one.2 Therefore he recommended setting up a powerful Board to produce such a strategy. We agree with this conclusion, subject to the strategy being exposed to full and meaningful public consultation, including from Local Government and in Parliament.

However, Naylor then proposed the brisk sale of £5.7bn-worth of NHS land, much of it (by value) in London. We consider this conclusion to be unsupportable, given Naylor's logical inference that an estate strategy needs to be in place before one can know what land is surplus to requirements, and why.

Therefore, we are concerned at the damage that would be done to the NHS estate, and to the contribution of planning to London, if any sale of NHS land in London takes place before a strategic framework is in place that has been subject to meaningful public consultation.

Most NHS land and buildings originate from hundreds of years of charitable donations and legacies by local people and institutions. Londoners and their Councils have a strong right to be consulted, and to influence, the future of this valuable public asset that was provided by our forbearers.

MAJOR CONCERNS

We acknowledge the London Plan's aspiration to create thousands of new homes. However, we consider that the concept put forward in the Chancellor's Autumn Statement of 2015, that a sell-off of NHS land3 be carried out so as to release land for 26,000 homes, is simplistic and damaging, even if echoed uncritically in other quarters. There exist more nuanced opportunities for NHS land to deliver housing gain at the same time as providing health and welfare benefit to Londoners, and preserving the estate assets of the NHS.

Failure to consider other reasonable alternatives

In the first place such sales would be irrational unless other reasonable alternatives to sale had been considered and compared. In our view, there are several options that provide better value for money, and more public benefit, as well as housing gain, than a straight sale of NHS land. We propose such alternatives, below.

The value of co-location

Since the London Plan is a spatial strategy, it is important that the value of co-location of NHS facilities and other health- and welfare-related uses is given due weight when considering the future uses and ownership of NHS land. Co-locating these uses on NHS land brings significant gains in functionality, efficiency, convenience, sustainability and value for money. Moreover, these gains are captured for the foreseeable future. This means that where there is the potential for co-location, NHS land carries a premium which would be lost upon a sale at market value: such land is of greater value to the NHS and to the public than it is to potential private purchasers for other, non-related uses.

PRIORITY USES FOR NHS LAND

Enfield Southgate CLP therefore proposes that the following estate priorities should be promoted by the London Plan alongside the Mayor of London’s role in the promotion of good health in London.

When any NHS land is identified as not being in clinical use,4 the Mayor should encourage the NHS to adopt a sequential test to appraise the use options for the land. NHS land should be safeguarded from sale into the private sector unless and until it has been demonstrated that all the following potential uses, listed below in a suggested 6-step priority sequence, have been considered, and rejected for good reason.

(1) Buildings currently in clinical use

The useful life of a healthcare building today is often as short as 30 years. Furthermore, clinical services change frequently, driving frequent internal reorganisation within buildings. Where there is a backlog of maintenance, it will be important in each case to consider, first, whether there is a business case for carrying out that maintenance. This must be compared with a business case for renovating, adapting or even replacing the building.5 Until these determinations are known, there can be no responsible decision to sell any NHS land that is available for this purpose.

(2) Expansion, replacement, and new facilities

Where the NHS owns land that is convenient for expansion and replacement of facilities, this should be retained. Those who argue that efficiency will reduce the amount of estate required by the NHS are overlooking projected population increase and the ageing of the population. Furthermore, the ongoing specialisation6 in medicine generates a need for additional specialist equipment and facilities. Moreover, it is far more efficient to preserve the co-location of healthfacilities by replacing them on site than by being forced to rebuild elsewhere.7 Land in this category should be retained.

(3) Step-down care

Experts consider that it is bad value for money for the government to sell NHS land for private house-building when such land, much of it co-located with hospitals, or in their vicinity, could be used for “step-down” care to relieve acute beds.

The revenue benefit from this, over time, far outweighs the sale proceeds of the land … The government is saying ‘save money first, in order to invest,’ but the more realistic approach is to invest so as to save—a pump-priming argument.

Land that is suitable for step-down care should be developed by the NHS urgently.

(4) Residential units for NHS staff

Building co-located residential units for NHS staff mitigates many problems in a single sweep.

· Housing: NHS staff, many of whom are on average to low pay, already form a significant proportion of those who are in housing need.

· Sleep: Many NHS staff work 12-hour shifts, which, according to recent sleep research, is a factor in reducing life expectancy.9

· Fatigue: By eliminating time spent travelling to work, co-located housing can mitigate the adverse effect of shift work, and reduce staff fatigue, thus increasing patient safety.

· Standard of living: Likewise, by eliminating travel expenses to work, resident NHS workers’ standard of living can be improved.

· Recruitment: The availability of such accommodation can be expected significantly to reduce recruitment problems faced by the NHS. Whether this housing is “social”, “affordable” or at market rents, it is clear that the NHS would be left in profit whichever of these terms of letting pertained. Moreover, the age profile of staff means that, today, more family housing is required, beyond the “nurses’ hostels” of yesteryear.10 This gives us the opportunity to impact the housing shortage significantly and in a targeted way that multiplies the benefits.

(5) Land swaps with other public-sector land

The Mayor should encourage the NHS not to dispose of land until it has been considered for other public uses by all local stakeholders.

The Mayor should encourage the NHS, the London local authorities and other public bodies to consider land swaps and/or purchases to improve their own estates and assemble required development sites, by securing more convenient sites from other public-sector holders of land.11

The Mayor should suggest a moratorium on all sales of NHS land until a clearing house is in place to prioritise the disposal of NHS land into the public sector before it is considered for sale into the private sector. This would ensure that, after NHS land has been considered for priority NHS uses, it becomes available for supported housing for elderly and vulnerable people and social housing at genuinely affordable rents, provided by local authorities.

(6) No unsuitable developments on former NHS land near hospitals

If, at the end of this sequential test, there is a case for selling any NHS site into the private sector, then the Mayor should favour a planning policy that prevents any type of development that would be unsuitable near any nearby hospital, for example by causing disturbance to patients or congestion preventing access to ambulances. Furthermore, what would be unacceptable would be for the public to be told that NHS land was to be developed into homes, only to find, later, that the dwellings so created were unaffordable by many Londoners, or had fallen into the hands of Buy-To-Let landlords via the exercise Right-to-Buy, or into the hands of international investors, to add to the current 20,000 long-term unoccupied homes in London.

User:	Socialist Health Association London

11.1.64

Having had involvement in successfully challenging and adapting the previous Mayor's TfL Bill we seek clarification as to the meaning of this: Specifically the reference to an Auction model.

User: Highams Park Planning Group

DELIVERY PLAN

In order for the Vision, Objectives and Policies of this Plan to be delivered, a range of organisations and groups will need to work in close collaboration. The Delivery Plan in Table 2 sets out the mechanism for this to happen. The fulfilment of one policy does not remove the need to satisfy any of the other policies to be in accord with this Plan.

The Delivery Plan sets out the following timescales for each Objective (O) and Policy:

• Ongoing - throughout the lifetime of the Plan
• Immediate - upon approval of the Plan
• Short - within one year of the approval of the Plan
• Medium - between one and five years of the Plan being approved
• Long - between five years and the end period of the Plan

Annex 1 Aspirations & Projects (including recommendations for the implementation of policies) is intended to help guide the Council, developers, and other relevant agencies as to how the community wants development to be shaped in the Area. Given that it is not possible to accurately predict the size and scale of future development in the Area the projects have not been costed or agreed. However, together with the recommendations the projects should inform Council policy - in particular with regard to the allocation of developer contributions in the Area.

The list below indicates the schemes and projects which should be given priority for the spending of developer contributions (both CIL and S106) in the Area.

List of Priorities for allocation of CIL Monies

i. Improvements to existing parks/green/open space and provision of new public green/open space.
ii. Additional tree planting in the public realm where requested by local residents or Council Officers. Planting of such trees shall be subject to the Council's normal procedures.
iii. Contributions to the improvement and expansion of public facilities in the Area. This shall include Hale End Library (extended use and opening hours). Money shall also be made available for new community facilities and community space such as the community hub in The Highams Park.
iv. Significant contributions to improvement of public transport facilities in the Area, particularly Highams Park Station – including provision of step-free access to both platforms without leaving the station.
v. The station has been the focal point for Highams Park's development throughout its past and it seems fitting to remodel part of the car park and The Avenue to create a public open space in front of what is a dignified station building.
vi. Improvements to HPDC, including street furniture, signs and pavements.vii. Contributions to schemes providing more space for pedestrians and improving pavements to a high standard.
viii. Additional bicycle stands.
ix. Funding for friends of parks and other community groups.

Objective / Policy	Actions	Timescale	By Who?
O1 & GNE1/GNE2	Protect and enhance existing green/open space and the local environment	Ongoing	LBWF Council, developers and local residents/community groups
O2 & PCF1	Maintain and improve facilities at Hale End Library	Immediate & Ongoing	LBWF Council & local residents/community groups
O2 & PCF2	Maintain community facilities on specified sites	Immediate & Ongoing	LBWF Council planners & developers
O2 & PCF3	Maintain use as public houses	Immediate & Ongoing	LBWF Council planners & developers
O2 & PCF4/ PCF5	Contribute to public facilities and bring improvements to community facilities	Immediate & Ongoing	LBWF Council planners & developers
O3 & BED1	Preservation and support of designated business areas	Ongoing and Long Term	LBWF Council planners & developers
O3 & BED2	Shops & restaurant improvements	Short Term & Ongoing	LBWF Council planners & developers

Policy E1 Offices

User:	Mr Peter Eversden MBE

Policy E1 for offices lacks mention of an important type of workspace.

Policy E1 B should have added '. . . including work space for voluntary enterprises that are part of the social infrastructure services in the area. See Policy E3 for affordable workspace.'

User:	Southern Housing Group
We support this policy. Provision of good quality, affordable office space is crucial to the delivery of sustainable communities.	

User: London Forum of Amenity and Civic Societies

Policy E1 for offices lacks mention of an important type of workspace – premises for voluntary organisations. See para 6.3.1, but also para 5.1.9 although there is no policy in Policy S1 to secure this and there should be, otherwise essential elements of social services may be lost.

Policy E1 B should have added 'including work space for voluntary enterprises that are part of the social infrastructure services in the area. See Policy E3 for affordable workspace.'

Policy E1 C and D: London Forum **welcomes** the recognition that it is not only public transport connectivity that matters but **public transport capacity**.

However, there is insufficient recognition of the public transport capacity constraints in this chapter and in the plan generally, except for paragraphs 2.1.1 and 2.1.11 (Opportunity Areas), Crossrail 2, 2.4.1 (CAZ), SD8 B (4)(c) (town centres).

The inconsistent treatment of capacity constraints in the previous density policy, risks being replicated in the current density policy (D6), because of its focus being entirely about individual housing sites. Policy D6 A (3) merely talks of “the capacity of surrounding infrastructure” and D6 B mentions “the capacity of existing and planned physical, environmental and social infrastructure to support new development”, which is then elaborated in D6 B 1) - 3). Public transport capacity constraints, especially at mainline stations in CAZ has been glossed over, as have the problems of certain Opportunity Areas, if they were ever built out (eg Earl’s Court/West Kensington).

This must be given attention in this New Plan.

Policy E1 D: London Forum **welcomes** the recognition of the role of Outer London town centres to absorb the growth suggested in Table 6.1, where 23% of office employment growth is projected to be in Outer London. This marks a movement away from what was alleged to be a Zone 1 plan for offices.

Policy E1 E and F: London Forum **welcomes** the support given to the retention of existing viable office floorspace in Inner and Outer London and the Mayor’s support for Article 4 Directions.

Policy E1 F should have a firm requirement for the boroughs and the Mayor to perform an objective study of the effects of the permitted development rights of offices and light industrial buildings on industrial estates.

Policy E1 G: London Forum **welcomes** the support given to lower cost and affordable workspace, but there should be a cross reference to Policy E3 C which covers the planning for that workspace.

Para 6.1.2 and Table 6.1: Projected office employment and floorspace: The concept of these projections being “a broad monitoring benchmark” rather than policy is **welcomed.** We also welcome the slight shift to Outer London (23% v 20%) from the 2015 London Plan.

The Opportunity Areas are stated to have the capacity for delivering over 750,000 jobs, compared with the 619,300 additional office job projections in paragraph 6.1.2. It seems surprising that there will be a high number of non-office jobs by 2041 implied by the difference between those figures.

User:	London Food LInk /Sustain

Offices.

Section G, need a new sub-para 4: The policy should require design of offices which enables kitchen garden produce to be grown and served in company restaurants or restaurants serving the office area.It should also look at ways to consider dining space for staff for larger employers.

Greening the city, healthier environment for workers and others, facilitating skill development to grow food, a healthier diet and understanding of links between food growing and food on the table. Good examples in Open House visits in the City – and across the world

User: London Assembly Green Party Group

I welcome policies E1 F and G which encourage boroughs to bring in Article 4 directions to protect town centres and local office clusters from permitted development rights, and encourages the splitting up for larger offices into smaller units suitable for small businesses.

Part F should be extended to allow Neighbourhood Forums to nominate for protection smaller office clusters near to local centres, as these are often sources of affordable business space, close to homes, and so have potential for development as co-working hubs, which are particularly suitable for people who also work at home.

The loss of spaces identified as valuable for local areas in this way should be avoided and Neighbourhood Forums are ideally placed to identify them.

User: Arcadis LLP

Policy E1. Offices.

Recommendations with respect to the development of smaller office units for SMEs etc should take into account the development of ‘asset as a service’ flexible workplace models. Our observation is that policy no longer needs to direct the physical provision of space for particular business sectors as the private sector has delivered a business model that can provide appropriate space flexibly. As part of Policy E1, the Mayor might consider whether a presumption for the reuse of commercial space as flexible space would be a better and more sustainable means of delivering workspace aimed at enterprizes outside of core areas.

Floorspace requirements. We note that floorspace requirements have been prepared on the basis of high levels of space utilisation and density compared to conventional office space. However, both densities and utilisation achieved via the ‘asset as a service’ flexible workplace model are much higher and will be achieved in both existing and new space. Accordingly, we would expect that office development requirements could be lower and that a wider range of occupancy should be used to model the potential impact of the wider adoption of asset as a service models of office occupancy.

User:	Watford Borough Council

The draft Plan could usefully consider the strategic and economic links between centres that are closely connected with the GLA such as Watford. Growth should be complementary to maximise the benefits of shared economic and housing areas including commuter networks and supply chains.

Suggested change: This would be appropriately addressed in the supporting text to the policy.

User: Mr Daniel Hill

Although the overall policy direction of travel is positive, there is too much wriggle room in the wording that could allow significant ongoing loss of office space - particularly in non prime areas. Affordable office space/space for SMEs is subject to significant demand but is often ignored in favour of new Grade A spaces. Furthermore the focus on South and West London is too focused. For example LB Newham has 95% SMEs but very little suitable space being delivered through the planning system and lots of evidence for demand for suitable flexible/affordable workspace/offices.

Moreover office space should not be seen in isolation. Local office spaces are complementary to retail spaces, industrial spaces etc. and assessments for their removal should take account of wider economic development objectives including the Good Growth principles set out in this plan. This should be inserted into the policy wording at the appropriate place.

More specifically:

The policy states that 'Existing viable office floorspace should be retained'

There needs to be a clearer view on viability here. what does viable mean? If an application comes forward that says that residental is more viable, then a developer could argue that existing space is not viable. The emerging EPC Level E minimum will also have an impact here. I would suggest replacing the wording with 'Existing office floorspace should be retained unless there is evidence of a lack of ongoing appropriate demand for suitable employment uses'.

The policy directs local authorities to develop an Art 4 directive where appropriate, but doesn't provide any guidance in the text below. Appropriate should include a range of factors such as evidence of demand, particularly amongst SMEs, support for wider-place making etc.

User: Twinn Sustainability Innovation

Offices

Policy E1-G. Add sub-clause 4: examine smart IT and new working practices to significantly reduce small power, lighting and any need for air-conditioning.

Note: Alternatives to the conventional BCO institutional standards shall be considered. BCO standards are now contributing to over-design, inefficient oversized M&E, unnecessary additional embodied energy, and the energy Performance Gap. Instead there are the opportunities offered by new smart IT and new working practices to significantly reduce *small power, lighting and hence air-conditioning and occupational costs. New tablet-based IT offers the opportunity for small power of less than 5W/m2 (USB power-draw is typically 2A at 5v), LED task lighting can be less than 1W/m2, both more than 80% reductions on BCO standards. This offers the potential for far more office type buildings to become naturally ventilated and hence typically half the energy use of air-conditioning (ref: ECON19).*

User: King and Company Ltd

In many locations, there will be an opportunity and ambition to deliver vibrant mixed use development close to public transport hubs. Those locations will very typically be within the urban grain and previously developed.

In marginal locations, policy obligations to deliver high levels of environmental performance create substantial viability challenges because they can impact upon the ability to clear brownfield sites and deliver mixed use development including offices which would represenr affordable workspace.

We would welcome that strong positive weight be put upon the delivery of office space in marginal locations as part of mixed use schemes, to be weighed in the balance alongside issues of density and the realisation of other competing planning objectives.

User:	Putney Society
E1.D.4 We strongly support that ‘locally-oriented, town centre office provision to meet local needs’ and often wider London needs should be supported in local centres. Spending by office staff in turn supports local shops and services.	

User:	Putney Society

E1.E We strongly support this. Putney is designated as the office centre for the borough in the current Wandsworth local plan, yet has lost around half of all office space in a few years through a combination of Permitted Development changes to private residential and developers arguing that in each case that development of older office stock (usually still in use at the time) can only be supported by replacing it with flats. As a result there is now little if any surplus space.

User:	Putney Society
E1.G Locating offices in the middle and outer suburbs a should be supported as reducing demand for commuting to the centre, and allowing more Londoners to work near home, perhaps at a distance where they can walk or cycle.	

User:	Putney Society

6.1.5 & 6.1.6. The requirements of most SME offices are not complex and can often be met by older buildings. Unfortunately these are too often now more valuable if converted to flats. We encourage the use of Article 4 Directions to remove permitted development rights in and around town centres.

User: Home Builders Federation

The policy is unsound because it is unjustified and in-effective in terms of helping to deliver London's housing needs.

Our chief concern with this policy concerning employment/industrial land is it will tend to reduce and land available for housing supply, rather than increase it. While we acknowledge the theory that encouraging higher densities and mixed uses will help to improve housing delivery while avoiding any net loss of the employment space, and enhancing provision, the truth is that these policies will add complexity and cost of the development process and this will deter applications.

The redevelopment of offices where these are surplus to local requirements has been an important component of London's housing supply. The introduction of stricter policies controlling the loss of office land as well as enhancing supply, will make development more difficult.

Part E. In terms of Part E we consider that the individual London planning authorities are better placed to judge whether existing viable office space outside of the CAZ and NIOD should be retained. We recommend that Part E is re-worded to read:

"In bringing forward their Local Plans, LPAs should consider whether it is appropriate to retain all existing office floorspace. LPAs should consider applying Article 4 Directions to remove permitted development rights…"

Part G. This part of the policy should be re-worded to allow the London LPAs a greater element of discretion in their Local Plans in terms of how this policy is applied, reflecting the possibility that the attainment of other policy objectives including supporting housing delivery, may be locally more important than enhancing the supply of employment space. We recommend that Part G is re-worded to read (our recommended

additional text is underlined):

“G Development proposals should:

1) Where appropriate, take into account the need for lower cost and affordable workspace…

2) Where feasible and viable, examine the scope for the re-use of otherwise surplus large office spaces for smaller units.”

User: Home Builders Federation

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User: EngineersHRW

Policy E1 Offices

Clause E1-G.

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User: Royal Borough of Kensington and Chelsea

6.1 Policy E1 Offices

The Council strongly supports Policy E1 being explicit in the need for boroughs to increase the stock of offices where this meets the need set out within the 2017 London Office Policy Review (LOPR). This will be extremely helpful as it allows us to take a positive approach to supporting the intensification of business uses within the borough’s Employment Zones.

The Council also welcomes the explicit recognition that Kensington and Chelsea is a "nationally significant office location", and the support for the introduction of an Article 4 direction for the entire borough. The protection of the borough’s office stock, through an Article 4 direction, is central to the Council’s ambition to maintain diversity of commercial uses across the borough.

The Council supports the proposal that Development Plans should support the provision of suitable space for SMEs.

User: London Borough of Islington

Chapter

Economy

Draft London Plan Policy

Policy E1 - Offices

Islington Response

Policies which seek to improve the quantity and quality of office space are strongly supported. In Islington, B1 use premises are the most numerous of employment use classes; almost three quarters of the Borough's commercial stock is office space. Increasing the provision of office floorspace is a key priority for the borough. The number of jobs in Islington is expected to increase by 50,500 up to 2036 and this is largely within the Professional and Technical Services sector, which generates the most demand for office space.

We would caution against some of the terminology used in policy E1, based on experience of how individual words are misused in planning applications. While the term 'competitiveness' is understood, it is not defined and could be misconstrued. Likewise, the requirement for 'authoritative' strategic and local evidence unnecessary; evidence will naturally need to be authoritative to stand up to scrutiny, and this will be tested through Local Plan examination and at planning applications. The 'authoritative' requirement could be seen as an additional, unnecessary hurdle.

The borough's most recent Employment Land Study from 2016 indicates a highly constrained supply-demand balance, whereby demand for office floorspace greatly exceeds supply. Land available for office development is outbid in value terms by residential use; this constrained supply is the biggest threat to economic growth in Islington. The Council intends to address this issue within new employment policies as part of the Local Plan review. Policies which seek to increase office stock, where justified by evidence of demand, are welcomed. We consider that E1(B) could be strengthened further by adding a spatial element, with stronger support/prioritisation for new space in the CAZ and other office-focused areas.

Policy E1 supports the development and promotion of the capitals unique agglomerations and dynamic clusters of world city businesses.

Islington is home to a number of economic clusters, including Tech City around Old Street; Clerkenwell Design Cluster; Medtech cluster along the Kings Cross - Moorfields Eye Hospital Corridor; and the Vale Royal / Brewery Road industrial cluster. These clusters are vital to the success of Islington's economy and wider London / national economies. Policies which support them are welcomed, as is the recognition that improvements to walking, cycling and public transport connectivity and capacity should also be supported. The Council intends to address these issues within new employment policies as part of the Local Plan review. We note that the policy does not require protection of space in the identified areas. While this can clearly be inferred, a specific reference should be included.

The distinction between criterion D(1) and D(4) should be clarified. We understand that D(4) is town centres not identified on Figure A1.4, but would welcome confirmation of this in the policy itself.

Part E of Policy E1 states that office markets outside the CAZ should be consolidated and where viable, extended, focusing new development in town centres and other existing office clusters. Islington has several designated employment areas outside of the CAZ. These important employment areas largely serve Islington's small business economy and are also helping service the central London economy. Policy E1(E) mentions release of surplus office capacity, but the term 'surplus' is not defined. Surplus in this instance needs to be accompanied with an additional caveat about the level of evidence required to truly justify space if surplus to requirements. The policy should defer to local guidance for requirements to justify loss of office floorspace.

Parts E and F of the policy set out support for Article 4 Directions in the CAZ and Tech City, and in local non-CAZ clusters. Islington will be consulting on a proposed Article 4 Direction to remove permitted development rights for the change of use from office to residential, and ongoing support from the GLA is welcomed.

Part G is broadly supported, noting the comments above regarding evidence requirements to justify loss of office floorspace. We consider that Part G should be amended to explicitly operate as a hierarchy, and that (1) and (2) need to be thoroughly investigated before redevelopment, intensification and change of use can take place.

With some minor amendments, the proposed policy would be effective in promoting and supporting the development of new offices, as well as sustaining the office function of key economic clusters. In order to link with Policy SD5, the GLA is asked to consider setting out specifically that offices in the CAZ will be protected, and new offices supported above other uses. Table 6.1 of the supporting text, which shows that almost 2/3 of growth is expected to come from the CAZ, surely justifies such specific protection.

Para 6.1.3 notes there is broadly sufficient capacity to accommodate office demand in the CAZ and NIOD, complemented by Tech City and K & C and future reserves. This statement does not truly reflect the LOPR 2017, and as such can be seen as a potentially dangerous

undermining comment. The LOPR recognises the relatively low level of current outstanding consents, suggesting that vigilance will be needed to ensure that potential locations of office expansion are safeguarded and encouraged to come forward into the development pipeline. It also identifies some spatial imbalances in capacity, noting the relatively limited capacity in some CAZ boroughs such as Islington and Southwark. Para 6.1.3 should be reworded to reflect these strong caveats identified in evidence.

User:	London Borough of Islington

Para 6.1.3 notes there is broadly sufficient capacity to accommodate office demand in the CAZ and NIOD, complemented by Tech City and K & C and future reserves. This statement does not truly reflect the LOPR 2017, and as such can be seen as a potentially dangerous undermining comment. The LOPR recognises the relatively low level of current outstanding consents, suggesting that vigilance will be needed to ensure that potential locations of office expansion are safeguarded and encouraged to come forward into the development pipeline. It also identifies some spatial imbalances in capacity, noting the relatively limited capacity in some CAZ boroughs such as Islington and Southwark. Para 6.1.3 should be reworded to reflect these strong caveats identified in evidence.

User:	Royal Town Planning Insitute

There has been a huge release of employment land across London in recent years. Between 2010-15 industrial land was released almost three times the rate recommended in the SPG, and in 2015 there was “approximately 83,227m² of office floor space in designated industrial areas in London with prior approval for office to residential conversion”.20 Thus we welcome the support for using Article 4 Directions to remove permitted development rights to allow the conversion of employment sites to residential without planning permission. However, we do not consider that such support needs to be stipulated within the Draft Plan as boroughs are already able to use these powers without it being a policy within the Draft London Plan. To avoid repeating national policy, we consider that these references could be deleted, to reduce the length and replication in the Draft Plan

User:	City of London Corporation

The City Corporation welcomes Policy E1 which supports and promotes office growth across London and specifically recognises the unique agglomeration and dynamic clusters of world class business in the CAZ. Reference to the need to progress Article 4 Directions to remove office to residential permitted development rights is also supported, and is being progressed by the City Corporation in the form of a non-immediate Article 4 Direction to come into effect at the end of May 2019.

User:	Wheels for Wellbeing

6.1 As a member of the Beyond the Bicycle coalition (a steering group made up of disabled, family and freight cyclists), we would like to see greater efforts made to encourage and incentivise businesses to use cargobikes for last-mile deliveries. Not only would such a policy generate good PR for companies, but it would also offer a sustainable form of transport and give the environmentally-conscience consumer greater satisfaction whilst, crucially, tackling congestion and air pollution. Financial incentives and subsidies could be offered to those businesses that choose to shift their deliveries to cargobike.

User:	London Borough of Barnet

We support policy recognition that diverse office markets in Outer London should be consolidated and where viable, extended, and to the focusing of new office development in town centres and other existing office clusters. We are also pleased to see explicit reference given to the need to retain existing viable office space in Outer London locations and to ensuring that office functions are not undermined by permitted development rights. We therefore welcome support given in the DLP to the introduction of Article 4 Directions to address adverse impacts of office to residential permitted development rights. Between May 2013 and January 2018 Barnet lost 37,829sqm of office space from the completion of 69 prior approval applications (which delivered 647 new private homes and no affordable units). Our recent Employment Land Review produced by Ramidus Consulting recommended business locations which would benefit from Article 4 protection

User: London Assembly Labour Group

Suggested changes

“to support firms wishing to start-up or expand” should be added to E1A which now reads “Improvements to the competitiveness and quality of office space of different sizes (for micro, small, medium-sized and larger enterprises) to support firms wishing to start-up or expand should be supported by new office provision, refurbishment and mixed-use development.”

Justification for policy recommendations

There are issues with ensuring enough business space dedicated to those businesses that wish to expand or grow. It should be recognised that start-ups and those wishing to expand have different requirements.

Suggested changes
“to support firms wishing to start-up or expand” should be added to E1A which now reads “Improvements to the competitiveness and quality of office space of different sizes (for micro, small, medium-sized and larger enterprises) to support firms wishing to start-up or expand should be supported by new office provision, refurbishment and mixed-use development.”

Justification for policy recommendations

There are issues with ensuring enough business space dedicated to those businesses that wish to expand or grow. It should be recognised that start-ups and those wishing to expand have different requirements.

User:	London Waste and Recycling Board (LWARB)

We agree that it is important to ensure there is sufficient space to support the growth of new start up companies and to accommodate SMEs, particularly those working in circular economy

User: British Land

30. British Land’s London portfolio incorporates over 6.6 million sq ft of office floorspace in primary, secondary and tertiary locations. We support the general increased protection for, and encouragement of, office space in Policy E1. Linked to this, we welcome the further support for offices contained within Policy SD5, noting that offices are to be given greater weight relative to new residential in the CAZ. This is particularly relevant in areas where mixed-use policies (those requiring an element of residential floorspace alongside new office floorspace) can curtail office development due to the requirement to incorporate residential floorspace within an existing office building or source alternative residential land. Part G of Policy E1 relates to lower cost and affordable workspace and we set our thoughts out on the merits of these policies below.

32. The support for flexible workspace in Policy E2 is to be encouraged but that this could be accommodated within Policy E1. To some extent this is already the case at Policy E1 Part A. Furthermore, other types of office provision are also fulfilling this part of the market. In 2017, British Land launched Storey, a flexible workspace product aimed specifically at SME’s. This product is a simple, all-in-one rental model that allows the use of small spaces, available on short leases, with shared services, higher levels of fit-out and lower up-front costs, which make it ideal for start-up and smaller firms. This product and similar ones in the market have an important and increasingly influential role in the provision of workspace for SMEs and as such additional obligations are not required by policy.

User: London Tenants Federation

6.1.1 Policy E1 – Offices

Competitiveness of office space is promoted and increases in stock encouraged, as are apparent ‘unique agglomerations and dynamic clusters of world city businesses and other specialist functions’. It is very difficult to see how this will impact positively on the points highlighted above from the supporting text of policy E11.

6.1.2 There is also a fair amount of office space owned by the public sector (which is more likely to employ people from households with lower and middle incomes) yet seemingly not ‘competitive’. The Mayor, however sees these (as set out in the London Housing Strategy) simply as opportunities to sell off for housing development.

User:	London Borough of Haringey
Haringey supports the overall proposed policies for Offices.	

User:	London Borough of Haringey
Support for boroughs making Article 4 Directions to protect existing offices is welcomed.	

User:	London Borough of Haringey

Support for lower cost and affordable workspace is welcomed in principle but this will need to be balanced with the impact of this on overall scheme viability, particularly in Outer London where new office space is likely to be part of mixed use development that is predominately residential (with associated affordable housing requirements).

User: RICS

Growing a good economy

The Mayor is right to prioritise the provision of adequate commercial and industrial spaces in **Policy E1 (offices) , E2 (Low-cost business spaces) and Policy E3 (Affordable workspace).** For London to thrive and to achieve the vision of sustainable growth and nurture new businesses.

The need for affordable work places (**Policy E3**) is also understood, however, provision of such places under Section 106 arrangements further shifts the balance away from provision of affordable housing. It has been suggested that some discounted commercial spaces can be provided in certain locations through ‘meanwhile use’ (**Policy H4**). The scope of these places to provide this is an idea worth exploring through the London plan.

The commercial property market however is a highly competitive market and is one of London’s strengths. Where there is a business demand for space, the sector innovates and develops solutions as is already happening with business cafes and co-working spaces. The Mayor should focus, as is being done to a degree with the London plan, on supporting innovation, highlighting best practice and promoting standards. This is something the RICS can support the Mayor in doing.

User:	Soho Society

E1 As requested in relation to policy SD5C please ensure that new hotel uses within the CAZ do not displace and erode existing office clusters.

User:	London Borough of Lewisham

We fully support the future potential change of Lewisham to Metropolitan status in Figure A1.1. This is in line with our aspirations and one of the aspirations of the Lewisham Gateway Partnership. As a Borough Lewisham are seeking to grow the local economy and increase demand for business/office space. Policy E1 should recognise those future aspirations and not limit the ability of Local Authorities to secure suitable office accommodation based on current demands.

User:	London Borough of Brent

The policy is supported. The Council has sought to introduce an Article 4 to better control loss of office space in growth and SIL/LSIS. Market appetite is the big issue for B1 offices historically and currently, whilst the evidence of the London Plan appears to support greater provision in outer London in limited locations, experience within Brent suggests that rents achieved will not support extensive building of new office space. Current Council policy seeks to protect/replace unless evidence suggests case from a needs/viability perspective is weak.

User:	London Borough of Bromley

The policy framework as it relates to office provision in Bromley remains largely unchanged in new London Plan, although it is noted that there is now greater emphasis on the role of Croydon Town Centre, a competitor with Bromley Town Centre in the South London office market. Strategic level support for boroughs to implement new Article 4 Directions where viable is supported in principle, allowing the Council greater management over the development outcomes of proposals on office sites.

User:	Save Swiss Cottage

Policy E1 – Offices
Competitiveness of office space is promoted and increases in stock encouraged, as are apparent ‘unique agglomerations and dynamic clusters of world city businesses and other specialist functions’. It is very difficult to see how this will impact positively on the points highlighted above from the supporting text of policy E11.
There is also a fair amount of office space owned by the public sector (which is more likely to employ people from households with lower and middle incomes) yet seemingly not ‘competitive’. The Mayor, however sees these (as set out in the London Housing Strategy) simply as opportunities to sell off for housing development.

User: London Councils

This policy sets out a welcome plan for sustaining and growing office space in London, which fits with London Council's concerns about the loss of workspace over recent years.

Local areas may need GLA support to implement Article 4 Directions to remove Permitted Development Rights where appropriate – this can be a difficult process and some areas have faced opposition from government. Moreover, the plan should explore other methods of preserving and growing office space in London beyond Article 4 Directions, which although they are an important tool, they are only one method and can be difficult to obtain. This could include work to increase densification of existing office space, or to develop previously unused space such as railway arches or wharves.

Some boroughs raised concerns regarding the release of office space 'where viable', which raises the question of who decides viability. This activity needs to be carried out jointly between the GLA and the boroughs, as local authorities will have a greater understanding of local complexities and need.

User: CBI

CBI members broadly support the Mayor of London's guidance for planners and developers to prioritise the provision of adequate commercial and industrial spaces (Policy E1), low-cost business spaces (Policy E2), and affordable workspaces (Policy E3). However, further clarity is required to ensure the implementation of the guidance does not inadvertently lead to a loss of business space across London.

To ensure businesses of all sizes thrive in London, the right conditions necessary to nurture new businesses are essential. Businesses commend the Mayor of London's focus on measures aimed at improving the competitiveness and quality of office space for firms of varied sizes. However, considering the guidance aimed at protecting a range of low-cost business space to support the needs of micro, small and medium-sized enterprises (Policy E2), businesses have suggested the implementation of this guidance could result in the unintended consequence of a loss of business space in London. As the guidance is finalised in the final draft of the London Plan, collaboration between the GLA and businesses will be important to ensure this is avoided.

User:	London Borough of Tower Hamlets

We support the overall policy approach.

We support bringing forward Article 4 directions, and emerging work to provide justification will be beneficial to inner London boroughs.

We have concerns with the reference to change of use of surplus space (Part E), which requires greater clarity and guidance on how this surplus should be determined or evidenced, in order to avoid undermining other policies and our own Local Plan position.

User: Royal Borough of Kingston

3.1 The aim of Policy GG5 (B), to share more equitably the economic success of London is supported. However, RBK does not consider this ambition to be expressed in other sections of the document and it is noted that the IIA rejects the option of a polycentric city. Instead the London Plan seeks to strengthen the economic offer of central parts of London without looking to increase employment capacity across London alongside significant increases in housing. Without explicit London Plan policy support, RBK will struggle to deliver new local employment floorspace to counterbalance the housing growth, increasing pressure on transport networks, reducing quality of life and failing to meet the needs of local businesses and potential businesses. The equalities impact of this approach is also poorly addressed. This approach will mean that outer London areas increasingly operate as dormitories by providing the workforce for a very centralised employment offer, but not providing the necessary local capacity for enterprise and employment. RBK suggests amendments to the approach to enable District town centres to secure new office and employment floorspace for a local/borough level catchment, rather than just small office protections. For larger town centres such as Kingston, this should be growth to support a sub-regional catchment, and should not be constrained by delivery of Crossrail 2.

3.2 RBK is also very concerned about protection of identified industrial locations. For successful areas such as those in Kingston, the policy should continue to protect the total amount of land, not merely *capacity* , to support future intensification and therefore *increased* future employment and economic benefits. This again would support local employment and enterprise alongside housing growth, to create a more sustainable city.

User: Royal Borough of Kingston

The policy to do more to encourage a polycentric city, with stronger local economic development and greater provision for increases in local offices and other workspaces consistent with the catchment of the town centre. Job creation, economic development and workspaces should increase alongside housing growth to ensure local opportunities for employment and enterprise. The 2011 Census commuter flows data showed a third of Kingston's residents' commutes were within the borough. London prides itself on its enterprise and small businesses: failure to provide a range of workplaces in appropriate locations across London harms London's competitiveness and economy.

There is a particular inconsistency between the jobs target in the Opportunity Area designation, and the reference to solely protection of small offices in Tolworth and New Malden.

E1 is not a clearly expressed policy. The identification of town centre locations refers to a map in the appendix, which then leads to a link on the GLA's webpage to London Office Policy Reviews which did not include the relevant information. Though the map includes Tolworth and New Malden, these towns are not mentioned in the review itself.

Although there is useful explanation for the encouragement of different sizes of business, it would be helpful for the sizes to be defined.

User: London Borough of Waltham Forest

We have commissioned GVA to produce an Employment Land Study. Our Employment Land Study states that most of our future employment, 70%, will be office-based. Office activity is an important part of our economy and Walthamstow is expected to become increasingly attractive for office space.

We support Policy E1 Part A, which seeks improvements to the competitiveness and quality of office space across a range of sizes through refurbishment and mixed use development.

We support Policy E 1 Part B which seeks to increase current stock of offices in London. We propose this part of the policy should be linked to Policy SD7. These policies will be used together and therefore both should better reflect each other. There may be confusion over viability and sustained demand. We welcome advice on which policy takes priority.

We support part E and part F of the policy which encourages boroughs to use Article 4 Directions. We are in the process of using Article 4 Direction powers to remove permitted development rights for the change of use from office to residential.

User:	London Borough of Hillingdon

The Mayor's support for the retention of office space and the specific support for existing office parks, including Stockley Park, is particularly supported. However the Council is of the view that significant investment in sustainable transport is required to maintain both Stockley Park and Uxbridge as successful outer London office locations.

Officers note the priority given to the delivery of Old Oak Common, however direct support should also be provided to secure the long-term prosperity of both Uxbridge town centre and Stockley Park, to prevent this expansion being to the detriment of other outer London employment areas.

User: HFFTRA

Policy E1 – Offices

Competitiveness of office space is promoted and increases in stock encouraged, as are apparent ‘unique agglomerations and dynamic clusters of world city businesses and other specialist functions’. It is very difficult to see how this will impact positively on the points highlighted above from the supporting text of policy E11.

There is also a fair amount of office space owned by the public sector (which is more likely to employ people from households with lower and middle incomes) yet seemingly not ‘competitive’. The Mayor, however sees these (as set out in the London Housing Strategy) simply as opportunities to sell off for housing development.

User:	London Borough of Merton

Object this policy is ineffective but could be made effective with significant amendments and we would welcome this.

Part A seems to be a statement of the obvious, rather than a policy.

User: London Borough of Merton

Object this policy is ineffective but could be made effective with significant amendments and we would welcome this.

Part B precludes boroughs supporting any speculative development of offices. Speculative office developers, such as we see in Wimbledon town centre, are likely to have a far greater and more up-to-date understanding of the business space and office market than planners.

Part B should be removed as unnecessarily restrictive and harmful to economic growth and jobs as it prevents boroughs from supporting office development unless there is *"authoritative, strategic and local evidence of sustained demand for office based activities, taking into account projected demand for office based employment and office floorspace to 2014 in Table 6.1*"

User:	London Borough of Merton

Part D is ineffective and needs a review to improve clarity and what it is trying to achieve. *The diverse office markets in inner and outer London (outside the CAZ and NIOD) should be consolidated and – where viable – extended*…" It isn't clear at all what this is trying to achieve – consolidation or extension which are two separate matters. Also, "inner and outer London" could just be expressed as "London"

User:	London Borough of Merton

Parts E, F and G are ineffective, duplicate matters and are undeliverable. Although this section refers several times to Article 4 Directions (and thereby an understanding of current permitted development right), Part G(3) states “ *support the redevelopment, intensification and change of use of surplus office space to other uses including housing*”, a policy that will rarely if ever be applied as this has been possible since 2013 via prior approval. Parts E and F can be combined with more concise wording to simply support the introduction of Article 4 Directions in specific geographic areas or circumstances.

User:	London Borough of Hounslow

LB Hounslow welcomes the recognition in the plan to the importance of business parks such as Chiswick Park and Bedfont Lakes in our borough for consolidation, extension and investment in sustainable transport infrastructure.

LB Hounslow strongly supports policy E1 for protection and increase of office space and the reuse of surplus office space for affordable workspace, and this is reflected in the Draft Local Plan Reviews. LBH is a pro-growth borough and we strongly support to principle of mixed use development to boost housing and jobs in a way that ensures that people can live and work in the borough - please see our overall response.

User: London Borough of Hackney

Policy provision D currently fails to recognise existing office clusters within the City Fringe Opportunity Area Framework that are outside of the Central Activities Zone and town centres office locations (such as Hackney Central and Dalston) the corridors along Kingsland Road and Mare Street (London Fields). In accordance with the OAPF, these areas should be the focus for new office and workspace. As such is recommended that Policy provision D is amended as per the following:

D The diverse office markets in outer and inner London (outside the CAZ and NIOD) should be consolidated and - where viable - extended, focusing new development in town centres and other existing office clusters supported by improvements to walking, cycling and public transport connectivity and capacity including:
1) the strategic outer London office location at Croydon town centre

2) other town centre office locations (see Town Centre Network office guidelines in Figure A1.4)

3) parts of the city fringe opportunity area outside the CAZ and other town centre office locations

4) existing urban business parks (such as Chiswick Park, Stockley Park and Bedfont Lakes), taking steps towards greater transport sustainability of these locations

5) locally-oriented, town centre office provision to meet local needs.
Hackney supports Support provisions E&F which encourage Boroughs to introduce Article 4 Directions to ensure office areas are not undermined.

User: Westminster City Council

Before identifying Stratford and Old Oak Common as “potential reserve locations for CAZ-type office functions” the Mayor needs to consider whether this objective is realistic. The CAZ functions because of agglomeration economies that are unlikely to support “satellites” beyond the central area of this kind (as experience with places like Croydon tends to bear out). There is considerable sunk investment in the designated CAZ and it seems to make little sense in economic or sustainability terms to take this kind of approach, the evidence for which is so uncertain.

We support criteria E and F but would prefer a short, unambiguous statement of support for borough article 4 directions and their objective - to ensure proper planning for office provision in the CAZ – to the rather woolly, process-focussed wording of criterion F. The decision about whether to make a direction is one for the borough concerned and not the Mayor; equally boroughs do not need to be told how to go about making directions. In any event by the time the DRLP is published these directions will be in force. For all these reasons we suggest this policy should be considerably condensed.

User:	London Borough of Southwark

The council supports the emphasis on the demand for offices in the CAZ and the importance of maintaining and growing this cluster of world class office space. The emphasis on changing dynamics of the office market is also supported, to ensure a diverse range of office spaces which includes space suitable for micro-businesses and SMEs.

User:	London Borough of Redbridge

We support this policy. However, we have concerns about E1(b) where evidence of demand is referenced. Part of regeneration is to reverse current trends and ‘create demand’.

The Council also recognises that office to residential conversions should be managed, and that the use of PD rights can effectively neuter the opportunity for a more comprehensive redevelopment that can yield more, higher quality housing.

User: London Borough of Wandsworth

The Council is supportive of Policy E1, noting in particular the impact of Permitted Development Rights and how this has led to significant supply issues for companies seeking space in this area which has historically been a source of affordable space. The Council's emerging Local Plan – Employment and Industry Document (LPEID) is in accordance with the policy, in particular criteria D which will protect the identified office locations and other protected office clusters as Employment Protection Areas.

A nonimmediate Article 4 Direction was issued on 11 May 2017 for Wandsworth Borough Council for identified office locations. It is proposed that subject to confirmation of the Direction that it will come into force 16 May 2018. The Plan's support for Councils to be able to introduce Article 4 protections in such areas is welcome. Support the balanced approach between residential and employment for the VNEB Opportunity Area which is appropriate for meeting placemaking
ambitions. Note that planning intervention may
need to be somewhat countercyclical
to market trends to ensure this long term objective
is met.

The strategic approach set out in policy E1 continues to protect the successful industrial areas and redesignate
some sites for mixed uses. These sites have the potential to provide
through consolidation increased industrial floorspace and provide residential uses as well as business floorspace (including offices) for SMEs to further support the borough's economy. This approach is in accordance with the Council's emerging Local Plan (LPEID).

The Council's emerging LPEID supports and encourages the provision for startup businesses and other SMEs within the borough through economic development providing managed and affordable workspace. It also sets out the requirements of new economic

development to ensure flexibility of space to improve the competitiveness of office space of different sizes.

User: London Borough of Richmond Upon Thames

The Council is supportive of Policy E1, noting in particular the impact of Permitted Development Rights and how this has led to significant supply issues for companies seeking space in this area which has historically been a source of affordable space.

There are potential implementation issues around the Policy's reliance on table 6.1 (Projected demand for Office Floorspace to 2041), which doesn't define this by borough, rather it just refers to Outer London @0.31.5 million sq.m. It is considered that this table could more accurately reflect requirements set out on a borough by borough basis relating to the need established within the London Office Policy Review 2017. It could become difficult to implement or an issue for discussion under Duty to Cooperate/ Statement Of Common Ground (SOCG) requirements under proposed changes to NPPF. Further clarity is required as to how this will be agreed and taken forward in practice in order for the policy to be implementable

The development of a blended portfolio to include startup/

affordable/accessible space is

an approach the Council supports in the light of much historic small scale stock being lost to Permitted Development Rights. The Plan's support for Councils to be able to introduce Article 4 protections in such areas is welcome. However the Council questions the significance of this policy given local authorities already have the power to introduce Article 4 directions. The Council has already introduced an Article 4 Direction to remove the permitted development rights for a change of use from offices to residential and has not relied on a Mayoral stance to justify.

The Council's emerging Local Plan supports and encourages the provision for startup businesses and other SMEs within the borough through economic development providing managed and affordable workspace.

User:	London Borough of Harrow

Policy E1 Harrow supports the overall proposed policies for Offices. However we have concerns about how Policy E1 & the town centre designations (as set out in Table A1.1) will be used in practice (see further comments below).

We also believe that the policy could be broadened to include protection for small conference / meeting spaces for microbusinesses and small businesses. There is demand for flexible meeting spaces that can accommodate up to 50 attendees, who may frequently work from home, but on occasion need small conference and meeting space.

User:	London Borough of Harrow

Harrow supports the Plan’s recognition that office space needs to be of a quality sought by the market. Harrow’s own evidence base (Economic Development Needs Assessment) suggests that with the significant loss of office space within the borough through permitted development rights, rental values have now reached a point where refurbished and new build office space is becoming viable when compared to alternative uses such as residential. Harrow however lacks competitiveness with respect to locational characteristics. Outer London can only by competitive against central London if orbital connections are improved.

User:	London Borough of Harrow

Table 6.1 indicates that the significant majority of new office development is anticipated to occur in Central London, further embedding the primacy of these areas for employment at the expense of Outer London. The draft Plan does little to re-balance employment growth and therefore fails to achieve its objectives relating to balanced communities, reducing the need to travel etc. With Government proposals for Business Rate retention favouring those areas with significant employment, financial benefits of employment uses will be unevenly distributed and have a significant impact upon the ability of outer London boroughs to provide services, noting that the draft Plan envisages significant increases in housing targets for outer London.

User:	London Borough of Harrow

Table 6.1 indicates that the significant majority of new office development is anticipated to occur in Central London, further embedding the primacy of these areas for employment at the expense of Outer London. The draft Plan does little to re-balance employment growth and therefore fails to achieve its objectives relating to balanced communities, reducing the need to travel etc. With Government proposals for Business Rate retention favouring those areas with significant employment, financial benefits of employment uses will be unevenly distributed and have a significant impact upon the ability of outer London boroughs to provide services, noting that the draft Plan envisages significant increases in housing targets for outer London.

User:	London Borough of Harrow

Policy E1 & Figure A1.4 & Table A1.1 in Annex 1 identifies town centres that will be supported for office development. For LB Harrow, this means that Harrow Town Centre (GLA Office Guideline - B) and Wealdstone, Stanmore and Edgware (part) town centres (GLA Office Guideline - C) - albeit fairly limited office role – is recognised. Given the pressure to redevelop sites for residential accommodation across the borough, we consider that this policy is unhelpful in that developers will now seek out office space in other town centres to redevelop as their protection will not be supported by this policy. We suggest that at least Pinner and North Harrow should be considered as “C” office locations, based on the GLA’s own Town Centre Health Check.

User:	London Borough of Harrow

Policy E1 & Figure A1.4 & Table A1.1 in Annex 1 identifies town centres that will be supported for office development. For LB Harrow, this means that Harrow Town Centre (GLA Office Guideline - B) and Wealdstone, Stanmore and Edgware (part) town centres (GLA Office Guideline - C) - albeit fairly limited office role – is recognised. Given the pressure to redevelop sites for residential accommodation across the borough, we consider that this policy is unhelpful in that developers will now seek out office space in other town centres to redevelop as their protection will not be supported by this policy. We suggest that at least Pinner and North Harrow should be considered as “C” office locations, based on the GLA’s own Town Centre Health Check.

User:	London Borough of Harrow

Support for boroughs making Article 4 Directions to protect existing offices is welcomed. The Mayor’s evidence base is a positive addition to Harrow’s local evidence base to justify Article 4 Directions.

User:	London Borough of Harrow

Support for lower cost and affordable workspace is welcomed in principle but this will need to be balanced with the impact of this on overall scheme viability, particularly in Outer London where new office space is likely to be part of mixed use development that is predominately residential (with associated affordable housing , requirements).

User: Marble Arch Partnership

We support the policy requiring boroughs to bring forward Article 4 Directions to restrict the loss of office space to residential allowed under the General Development Order. However, we would also ask that consideration be given to protecting offices from conversion and redevelopment to hotels. In our area, we have seen three separate proposals to convert office space to hotels in the last year and are concerned that if this trend continues, our current mixed economy will become overly reliant on the visitor economy with the consequent impact on local shops and services.

Policy SD5 and Policy E1 should also encourage the addition of extensions to existing office buildings and that these should take precedence over and above views from Conservation Areas unless they can be shown to have a particularly harmful impact. Extensions to buildings inside Conservation Areas will always be more contentious than outside Conservation Areas, and given the extent of Conservations Areas in and around our BID, to achieve any office and commercial growth must mean generally allowing extensions on sites not in Conservation Areas. But our experience is that such extensions to commercial buildings are often thwarted merely because they are visible from nearby Conservation Areas. We would suggest that Policy E1 should allow for modest extensions to commercial premises on sites outside Conservation Areas unless they have a really significant impact on rather than simply changing the current view. There have also been instances where we think that the impact of servicing has also been used to refuse proposals when such impact is in reality minimal.

User: London Borough of Havering

As above, Article 4 Directions could be a helpful tool but in many cases it may be too late.

Some remaining office space in Havering following the use of permitted development rights is of low quality. There is demand for higher quality space from office – based businesses but the anticipated rental levels may be insufficient for developers to promote large-scale speculative commercial workspace. Demands for lower cost and affordable workspace could exacerbate the situation. Havering has relatively low cost office accommodation but occupiers want high quality at low cost.

The policy also states that boroughs should support redevelopment proposals for surplus office space to housing. In Havering, there have been significant reductions in the quantum of office floorspace and it may now be necessary to consider incorporating employment space in new mixed use developments.

Paragraph 6.1.4

The text could go further to positively promote north east London as providing opportunities for office employment (as well as west and south London) – taking into account Crossrail and transport opportunities from Essex/Suffolk.

User:	London Borough of Enfield

Policy E1 looks at office provision. There should be greater emphasis on supporting office growth/clusters within Opportunity Areas or growth corridors where there will be large scale strategic transport infrastructure improvements, supported by Article 4 directions. The draft plan should consider office provision as an acceptable replacement for SIL land where Boroughs suffer from a low-wage economy

User: London First

A: support
B: support but we believe this policy could be made more succinct. It currently reads:
Increases in the current stock of offices should be supported, where there is authoritative, strategic and local evidence of sustained demand for office-based activities, taking into account projected demand for office-based employment and office floorspace to 2041 in Table 6.1.

It should be amended as follows:
Increases in the current stock of offices should be supported ***in sustainable and accessible locations (see part D)*** *[Delete: "where there is authoritative, strategic and local evidence of sustained demand for office-based activities, taking into account projected demand for office-based employment and office floorspace to 2041 in Table 6.1."]*

C: Support and welcome the recognition of Stratford and Old Oak Common as emerging locations for strategic office development.

D: Parts 2 and 4 currently read:
2) other town centre office locations (see Town Centre Network office guidelines in Figure A1.4)
4) locally-oriented, town centre office provision to meet local needs.

These references should be amended to promote office development at highly accessible locations such as transport hubs which do not have town centre status as follows:
2) other town centre office locations (see Town Centre Network office guidelines in Figure A1.4) ***and transport hubs***
4) locally-oriented, town centre office provision ***and at transport hubs*** *to meet local needs.*

E and F: We welcome the Mayor's strategic support for extending protection for existing office floorspace from change of use from office to residential to residential through the use of Article 4 directions.

G: See comments on policy E2 and E3. We have some significant concerns that policies E2 and E3 will result in significant unintended consequences and result in distortion to the office market that would disadvantage the very occupiers that the policies are seeking to support.

User: Berkeley Group

7. ECONOMY

7.1. Redevelopment of obsolete and surplus offices, especially in town centres, is an important source of land for housing and delivers wider benefits such as to the public realm and through providing a customer base for town centre uses. Such developments are likely to contribute to environmental improvements and affordable housing as well as the Community Infrastructure Levy. Any requirement to provide affordable workspace would be a further burden on viability and could prevent development.

7.2. Whilst a large office may physically be able to be subdivided it may not be economically viable to do so, nor provide appropriate office space. Policy E1 should be amended:

Policy E1 Offices
G Development proposals should:
1) Where appropriate, take into account the need for lower cost and affordable workspace (see Policy E2 Low-cost business space and Policy E3 Affordable workspace)
2) Where feasible and viable, examine the scope for the re-use of otherwise surplus large office spaces for smaller units

7.3. Delivering the target of 65,000 homes each year requires a sufficient quantity of land for residential and mixed use development. All B1 space (including studios) should not be subject to a policy of protection and requirement for re-provision. This risks fossilising poor quality and poorly-utilised offices, placing onerous burdens on development and increasing cost and complexity of development. The policy risks dis-incentivising granting short/flexible leases to businesses at the end of a building's economic life if it could create a barrier to redevelopment.

7.4. Requirements for affordable workspace should be confined to commercial developments in exceptional circumstances where evidence demonstrates the need. If affordable workspace is exceptionally to be included in mixed use developments it is not practical to require provision in advance of residential occupations. Market housing carries an increasing cost burden of CIL, S106, affordable housing as well as supporting other uses. The cumulative impact of these burdens could make development unviable, or make residential less viable than other uses.

7.5. Requiring mixed use elements to be 'operational' prior to residential occupations may not be physically possible or desirable depending

on the phasing and configuration of the development, and will add a further drag on cash flow. Forward sales of residential are likely to be needed to fund the development.

User: Just Space

Policy E1 Offices

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

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

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

Proposed change:

G Development proposals should:

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

User: London Borough of Bexley

Policy E1 Offices supports the consolidation of offices where appropriate and locally identified, or their expansion where viable, and this is welcomed by the Council. Bexley contains a relatively small amount office stock, with the majority of this space clustered in and around town and district centres. The borough is not currently viewed as a particularly good office location, with poor public transport connectivity and a lack of critical mass constraining the ability to attract and sustain larger office occupiers compared to nearby office locations. Local commercial agents have noted that there is currently insufficient demand to warrant speculative development in Bexley, and this is unlikely to change over the short to medium term, particularly while vacant office space remains available in nearby locations. There is concern that without the necessary investment in public transport improvements in the borough, Bexley will continue to underperform in the higher value office-based sectors and fail to deliver the much needed office capacity to 2041 as set out in **Paragraph 6.1.2.**

Paragraph 6.1.6 raises concerns over the loss of offices through Permitted Development. The introduction of Permitted Development rights for the change of use from office to residential has started to have an impact in Bexley and the Council will clearly need to carefully monitor the future loss of office space. The resources required to implement Article 4 Directions should not be underestimated by the Mayor. Significant evidence gathering and the formation of a robust case is required in order to satisfy the Secretary of State that intervention is necessary.

User:	Heart of London Business Alliance

We support he approach taken by the Mayor in Policy E1: Offices. We note the projections of 267,700 jobs to be accommodated in the CAZ and Norther Isle of Dogs (NIOD) require 3.5 million sq m of additional office floorspace. We support and welcome the additional protections in the plan for existing employment space and the strategic approach to new public transport, cycling and walking. However, the same strong direction to local planning authorities that has been applied to providing new homes has not been applied to commercial space. Stronger support for intensifying existing employment sites in line with our comments on Policy SD6 and Policy D8 would go some way to achieve this.

User:	Federation of Small Businesses

We are pleased to see recognition for micro businesses that make up the majority of businesses in London. Small firms struggle to get affordable workspace and so any new, refurbished, mixed use office space must be truly affordable otherwise small businesses will be priced out of London. Commercial business space costs are already being cited by many micro and small business as having a negative effect on their commercial viability.

User:	Federation of Small Businesses

The drive to create extra floorspace is welcome, however, we must not be consigned to just picking certain areas as the Plan does not mention North London in Section 6.1.4. This area will hopefully be getting further infrastructure with, the proposed Crossrail 2 line before 2041.

It is vitally important that floorspace is found where businesses need it and not where it is easier to provide it.

User:	Federation of Small Businesses

We would like this to go further and not be so prescriptive in terms of designated areas as there are issues in the majority of boroughs regarding PDR that need serious attention.

User:	Federation of Small Businesses

This point about supporting local businesses being able to obtain affordable workspace is critical. Research shows that for every £1 spent with a small or medium-sized business (SME) 63p was re-spent in the local area compared to 40p in every £1 spent with a larger business.

User:	Heathrow Strategic Planning Group

Policies E1 and E4 for office and logistics
It is noted that Policy E1 identifies out of centre office locations to include Chiswick Park, Bedfont Lakes, Stockley Park, where steps are to be taken to achieve greater levels of access by public transport; this is welcomed. The assessment of adequate capacity for office growth has not factored in a range of scenarios reflecting for airport expansion as yet.
Hillingdon, Hounslow and Ealing boroughs are all identified to retain or provide capacity for industrial land. Policy E4 addresses demand for space for Industry, logistics and services to support London's economic function – the Group is concerned that inadequate consideration has been given to the rapid expansion of 'belly hold' cargo and dedicated air freight through Heathrow. Evidence prepared for HAL provides low to high range forecasts for three scenarios: (i) 2-runway constrained, and 3-runway growth (ii) 'carbon capped' and (iii) 'carbon traded'.
The Group are concerned that all projections of growth in demand for cargo handling, freight forwarding and Other airport-related logistics land are significantly above past trend based projections in all these scenarios, and therefore that the evidence base for the new London Plan will need to be revised to address this.

User:	Ministry of Housing, Communities & Local Government

The Secretary of State’s Letter in response to the draft London Plan consultation refers to inconsistencies with national policy, including the NPPF.
The Town and Country Planning (General Permitted Development) (England) Order 2015, allows for the change of use of offices to residential use. The NPPF says that the use of Article 4 directions to remove national permitted development rights should be limited to situations where this is necessary to protect local amenity or the wellbeing of the area. The potential harm that the direction is intended to address should be clearly identified.
The Mayor should consider whether part E of this policy is consistent with national policy.

User:	Kingston and Surbiton Constituency Labour Party

We welcome the use of Article 4 Directions to limit the loss of office blocks, and the support for SMEs.

User: Chartered Institute of Architectural Technologists

Economy

Policies E1 to E11

We are in agreement with the proposals contained in the plan.

User:	Construction Products Association

1. The proposal to allow Article 4 Directions to remove permitted development where appropriate supports the capital's £10.5 billion commercial construction sector and projections for additional demand for office floor space. However, this may undermine housing targets. The role of change of use to residential in raising net housing supply has increased in recent years. In London, total change of use accounted for 8.6% of net housing supply in 2012/13 (1,801 units), rising each year to 22.1% in 2016/17 (8,757 units). Change in use of offices to residential accounted for 15.9% of London's net housing supply in 2016/17. For England as a whole, offices to residential accounted for 8.2% of net housing supply in the same year.

User: British Property Federation

We are pleased that the importance of office space across London is acknowledged by the Mayor and are encouraged by the commitment to ensure that employment and industrial space is located in the right areas and with the right transport infrastructure to support it. We would also recommend that similar industries be further encouraged to located near each other; as articulated in D8 Tall Buildings, this can lead to opportunities for business specialisation, knowledge spill over, increased efficiency, access to larger labour markets and economies of scale[i]. This was found to make people more productive; a case study constructed by Colin Buchanan found that relocating 80,000 jobs to accessible high-density locations would increase output by £206 million annually[ii]. Ultimately, it is vital that London contains the right amount and types of office space and that they are laid out in a manner to maximise the productivity of any type of business, from start-ups to more established enterprises.

[i] *The economic impact of high density development and tall buildings in central business districts*, A report for the British Property Federation by Colin Buchanan and Partners (September 2008); http://www.ctbuh.org/Portals/0/People/WorkingGroups/Legal/LegalWG_BPF_Report.pdf

[ii] *ibid*.

User: East of England Local Government Association

The policy emphasis on offices is understandable given London's forecast growth in office-based employment of 619,300 over the 25 years of the plan. At 24,772 per annum, this is 64% more than the 15,150 per annum in the current adopted plan. The LSE's review of research noted the relationship between London's employment growth and commuting and highlighted that managerial-technical occupations account for over 75% of net commuting into London and the entire growth in net inward commuting between 2004 and 2016 (LSE, Review of Research on Migration Influences and Implications for Population Dynamics in the Wider South East, page 78). Given that London's own research highlights that most (288,800) of the increase in office employment will occur in the Central Activity Zone, and that commuting from the WSE is so significant, there is a clear need to deliver a wide range of transport measures to meet this increase in demand.

The Draft London Plan places the potential for Stratford to act as a satellite for major office space but only after demand has exceeded the capacity of the Central Activity Zone and the Northern Isle of Dogs. The London Plan should be setting a positive framework to facilitate development and this hierarchy should not restrict the potential for "good growth" to occur in these satellite locations even if there is capacity within the other areas.

User: CBRE Global Investing

Policy E1 seeks to improve the competitiveness and quality of office space of different sizes (for micro, small, medium-sized and larger enterprises) through the provision of new office space, refurbishment and mixed-use development.

Part B of Policy E1 states that the increases in the current stock of offices should be supported, where there is authoritative, strategic and local evidence of sustained demand for office-based activities, taking account of projected demand for office-based employment and office floorspace to 2041. The projected demand shown in Table 6.1 shows that the office floorspace demand throughout London as a whole is expected to double between 2016-2041.

Part C of the policy seeks to promote the Central Activities Zone (CAZ), NIOD (Northern Isle of Dogs) and other nationally-significant office locations throughout London, as well as town centres and existing office clusters outside of Central London. Parts E and G of the policy concern the reuse and redevelopment of office floorspace.

CBRE Global Investors supports the protection and increase in office stock throughout London, through the development of new office schemes, mixed-use schemes and extension and refurbishment of existing office buildings. CBRE Global Investors particularly supports the protection of office floorspace within the CAZ, NIOD and other nationally significant office locations, as well as appropriately located town centres and sustainably located office clusters. CBRE Global Investors supports the reuse or redevelopment of office floorspace in the appropriate locations.

User:	Benhill Residents

Competitiveness of office space is promoted and increases in stock encouraged, as are apparent ‘unique agglomerations and dynamic clusters of world city businesses and other specialist functions’. It is very difficult to see how this will impact positively on the points highlighted above from the supporting text of policy E11.

There is also a fair amount of office space owned by the public sector (which is more likely to employ people from households with lower and middle incomes) yet seemingly
not ‘competitive’. The Mayor, however sees these (as set out in the London Housing Strategy) simply as opportunities to sell off for housing development.

User:	Royal London

Policy E1 – Offices

RL support the protection and objectives to increase office stock throughout London, through the development of new office schemes, mixed use schemes and extension and refurbishment of existing office buildings. RL note and welcome the protection and policy support for the provision of office floorspace within the Central Activities Zone.

User:	Elaine Chambers

Competitiveness of office space is promoted and increases in stock encouraged, as are apparent ‘unique agglomerations and dynamic clusters of world city businesses and other specialist functions’. It is very difficult to see how this will impact positively on the points highlighted above from the supporting text of policy E11. There is also a fair amount of office space owned by the public sector (which is more likely to employ people from households with lower and middle incomes) yet seemingly not ‘competitive’. The Mayor, however sees these (as set out in the London Housing Strategy) simply as opportunities to sell off for housing development.

User:	Earls Court Public Sector Tenants' Assoc

Competitiveness of office space is promoted and increases in stock encouraged, as are apparent ‘unique agglomerations and dynamic clusters of world city businesses and other specialist functions’. It is very difficult to see how this will impact positively on the points highlighted above from the supporting text of policy E11.

There is also a fair amount of office space owned by the public sector (which is more likely to employ people from households with lower and middle incomes) yet seemingly not ‘competitive’. The Mayor, however sees these (as set out in the London Housing Strategy) simply as opportunities to sell off for housing development.

User:	Living Streets

We strongly support “D. The diverse office markets in outer and inner London (outside the CAZ and NIOD) should be consolidated and - where viable - extended, focusing new development in town centres and other existing office clusters supported by improvements to walking, cycling and public transport connectivity and capacity”

User:	Brixton Society
E1-F, Protecting Offices: We strongly support the use of Article 4 Directions to protect existing office uses in Town Centres and other local business clusters.	

User: Silvertown Homes

Identify demand for new offices. In practice this will generally imply a need test is carried out, given much development does not have a designated end-user at the planning application stage. It is perverse to suggest one given that paragraph 6.1.2 states that ‘it is important that the planning process does not compromise potential growth’.
There are at least five important points here:

? very few applicants would progress development if they did not foresee demand;
? new stock refreshes London’s offer and enhances its appeal to businesses and thus the city’s economic competitiveness;
? if new development reduces demand for secondary or tertiary stock beyond the site then this may reduce rents and so bring benefits in terms of affordability;
? reduced demand for secondary or tertiary stock makes it more likely that such stock will be brought forward for redevelopment; and

? on a macro-level London requires new office floorspace and if targets are to be achieved then it is illogical to assume that a need test is applied at the micro level.

Part B of Policy E1 should be revisited so that there is no need to demonstrate demand or need for new office development. The NPPF provides national policy on this point.

User: London Property Alliance

Table 6.1 of the draft London Plan sets out projections for office employment growth in the period 2016-2041.

Demand for office accommodation is then derived from these employment projections. Within the CAZ (and Northern Isle of Dogs ('NIOD')), a need for 3.5m sq m is identified. This equates to 140,000 sq m (GIA) per annum ('pa'). This is a considerable increase in the overall employment projection for the CAZ and NIOD when compared to the equivalent figures in the existing London Plan.

Table 4.1 of the existing Plan projects office employment growth of 8,850 jobs pa in the CAZ and NIOD. The equivalent figure in the new Plan is 14,708 additional jobs pa, a 66% increase. The resultant floorspace projections show a much lower increase, however. This is because the floorspace projections are based on challenging assumptions regarding occupational density and desk-sharing. In particular, it is assumed that:

a) all new office stock is occupied at a density of 10.9 sq m NIA per desk space;
b) desk spaces are occupied at a rate of 1.2 per worker; and
c) NIA is converted to GIA at 80%.10

Consequently, the annualised projected growth within CAZ / NIOD at 140,000 sq m pa11 is not dissimilar to the 135,000 sq m to 153,000 sq m pa target within the
existing London Plan (Table 4.1).

The Alliance considers that the Plan needs to be clear that this floorspace target should be a **minimum lower figure that is to be exceeded and that boroughs may set higher targets**. This is because:

a) The assumptions made regarding floorspace density and net-to-gross ratios, in particular, are challenging. Not all development will achieve this level of efficiency and, consequently, additional gross floorspace will be required;
b) The projected Inner London annualised rate (including CAZ, NIOD and the rest of Inner London) of 184,000 sq m pa would only slightly exceed growth in stock in the Inner London area over the last 15 years, reported at c. 166,000 sq m12;
c) There is, potentially, additional capacity available. Westminster City Council's recent City Plan sets a target of 774,000 sq m of additional Class B1 space between 2016/17 and 2036/3713 and work undertaken by the WEP has identified significant additional capacity for

employment growth within London's West End, identifying the potential for over 2 million sq m of potential additional commercial floorspace within the West End alone14; and
d) Office developments are often office-led with ground and lower ground retail or leisure uses provided. Such uses inevitably have an impact on the delivery of office floorspace on a site, albeit a proportion of employment will be from the retail/leisure uses.

In view of the historically low level of pipeline supply identified in AMR 1315 and low vacancy rates, especially in the West End, the Plan should be clear that this is a
minimum floorspace figure that should be surpassed to ensure that office supply is not constrained.

We also note that, within Westminster / the key West End office market, office stock has been lost, rather than added to, in recent years. In part this is due to office to
residential permitted development rights as well as changes of use in recent years. Nevertheless, Table 9.14 of LOPR 2017 illustrates that Westminster will be
expected to reverse this trend and deliver sustained growth in office floorspace. 5.14 Constraints on supply should be addressed to ensure that this is deliverable and
development is encouraged, not restrained, and office space should be prioritised in the CAZ.

The Alliance suggests that Policy E1(B) is amended as follows:

"Increases in the current stock of offices should be supported:
i. within the CAZ; and,
ii. elsewhere, where there is authoritative, strategic and local evidence of sustained demand for office-based activities.
~~taking into account~~ Regard should be had to any local evidence of minimum employment floorspace requirements as well as the projected demand for
office-based employment and office floorspace to 2041 in Table 6.1. Table 6.1 is a projection that may be exceeded."

User:	HB Reavis UK Limited

HB Reavis supports policy E1 which calls for improvements to the competitiveness and quality of office space of different sizes to be supported by new office provision, refurbishment and mixed-use development. We also welcome Part B which supports increases in the current stock of offices and the recognition of the CAZ as a unique agglomeration and dynamic cluster of world city businesses.

User:	Camden Town Conservation Area Advisory Committee

E1 F

We welcome this policy on the introduction of appropriate Article 4 Directions to limit the loss of functioning workspace in specific areas.

User: Camden Town Conservation Area Advisory Committee

E1 G 1

Draft policy: '… take into account the need for lower cost and affordable workspace
…'

Our proposed amendments – reasoning: We would welcome a stronger support for affordable workspace, to ensure that development does not destroy local economies, local creative industry, and local communities and our diversity.

Our proposed revised text: '… take into account the need for lower cost and affordable workspace, and ensure provision for affordable workspace in developments

notably in Camden Town where keeping and increasing these workspaces is an essential ingredient in the Camden Town's character and economic success. Think of successful Amsterdam's Town Centre and make the Town Centre
Strategy the overarching policy for Camden Town.

User:	Bishopsgate Goods Yard Regeneration Limited

The draft London Plan emphasises the importance of existing and new office space across London and identifies a commitment to ensure that employment and industrial space is located in the right areas and with the right transport infrastructure to support it.

User:	Here East

Here East supports the proposal of Stratford as a future potential reserve location for CAZ-type office functions. However, as a significant employer in the QEOP, Here East considers that mention should instead be given to Stratford and the QEOP.

User:	London Borough of Newham

Policy E1 Offices

LBN are generally supportive of the policy which is complementary to Newham's Draft Revised Local Plan including the reference to the role of Royal Docks Enterprise Zone, whilst noting that most office growth in Newham will occur through extant planning consents and allocations

User:	London Borough of Sutton

OBJECT - UNSOUND - NOT EFFECTIVE. The London Borough of Sutton does not support Part B of the policy, which states “increases in the current stock of offices should be supported, where there is authoritative, strategic and local evidence of sustained demand for office-based activities, taking into account projected demand for office-based employment and office floorspace to 2041”. The Council submits that this policy is misconceived and goes against trends which identify that office floorspace has been decimated in south-west London since the introduction of the office to residential permitted development rights, with 29% of office space lost in Sutton Town Centre between May 2013 and January 2017. The council considers that every support should be given to address the loss of employment space. However, this policy appears to fetter it with restrictions based on forecasts. The council would like to see Part B deleted or revised to be made more positive for office developers to develop wherever they choose.

User:	Old Oak Park Limited

We support the promotion and development of London’s office stock, in particular where it creates or reinforces a unique agglomeration or dynamic cluster of economic activity. We also support a flexible approach to lower cost and affordable workspace, being a matter to be taken into account and applied where appropriate rather than all office development being required to provide such floorspace.

User:	Elephant & Castle Properties Co Limited
Policy E1 – Offices. We support the overarching principles of this policy, and in particular the directive for development to support redevelopment, intensifying and change of use of surplus office space to other uses.	

User: Heathrow Airport

Heathrow's presence has positively influenced the locational decisions of many of the international headquarters that have clustered within the Thames Valley and west London sub-regions. With expansion, this trend is likely to continue, and there will be increased demand for smaller airport-related office development closer to the airport.

Whilst proposed Policy E1 makes reference to urban business parks at Stockley Park and Bedfont Lakes, both very close to Heathrow the policy does not recognise the particular draw that major public transport interchanges like Heathrow have on attracting a variety of new office development, particularly if the airport is to be expanded. Moreover, such locations offer a very sustainable alternative to the traditional office locations referenced in proposed Policy E1, whether they are likely to attract occupiers seeking good access and close proximity to Heathrow's unrivalled internal connections or are seeking to benefit from the airport supply chain opportunities.

We are already working closely with the HSPG to understanding the employment development requirements from an expanded airport and set out demand forecasts for a variety of airport related development and uses in our current public consultation on our expansion proposals.

Irrespective of expansion, our ambition is to continue to promote some of the land adjacent to our terminals for airport related office and hotel development, as commonly seen at other major European hub airports. Heathrow's current and improving public transport accessibility, taking into account planned and committed rail enhancements, will ensure the airport and the surrounding area remain an attractive location for office and employment related development.

For the reasons given above we consider that Policy E1 should recongise Heathrow, and indeed other major transport interchanges, as potential locations for office development.

User: Imperial College London

Draft policy E1 and much of the associated chapter 6, focuses office development within CAZ, northern Isle of Dogs and town centres/other existing office clusters. None of the these provide support for continuing the development of Imperial College London's innovation district at White City, where plans to bring together the academic community, businesses, entrepreneurs and other partners to create an innovation ecosystem are already well underway and previously had strong policy support within the London Plan.

It is therefore requested that Policy E1 part D be expanded, to state that the focus for new development will be in "…town centres, other existing office clusters **and planned accessible locations, particularly within Opportunity Areas**…"

User: DTZ Investors

Concern is expressed regarding the ambiguity of draft Policy E1 in identifying that “Existing viable office floorspace capacity in outer and inner London locations outside the CAZ and NIOD [Northern Isle of Dogs] should be retained”. Whilst it is acknowledged that the loss of offices to residential use is a legitimate concern, it is considered that protecting existing all viable employment floorspace across London would be unduly restrictive, as preventing the loss of offices to other commercial uses could unduly hinder regeneration and job creation. In addition to securing Article 4 Directions to prevent offices being lost to residential use under permitted development rights, it should be for individual London boroughs to determine whether to protect existing office use, or whether to designate particular areas within which existing offices might be protected.

Change Sought - Accordingly, it is considered that draft policy E1(E) should be amended to refer to the overall office stock within London Boroughs needing to be protected specifically from being lost to residential use, supported by use of Article 4 directions to remove permitted development rights where appropriate. With respect to alternative uses, the policy should identify scope for London Boroughs to introduce development plan policies to specifically protect office use from conversion/replacement to other commercial employment-generating uses as appropriate.

User: Aitch Group

My client supports the thrust of this policy in terms of its recognition of the changing office market.

My client also supports the recognition set out in part D. of the policy in relation to reprovision of office floorspace should be focused in town centres and office clusters.

The policy needs to be made clear that when dealing with the change of use of employment sites outside of these areas/ predominantly residential areas that policy should be sufficiently flexible to allow the change of use, particularly residential. There should be no requirement for long term marketing campaigns when it is either not desirable to retain the employment use in that location or it can be reprovided in a more efficient way to meet an identified demand. Boroughs should not be allowed to resist applications for changes of use where continued employment use does not meet the requirements of the policy for focusing such development in sustainable town centre locations. It is recognised that some reprovision of employment space can cater for local need/ companies.

User: Arup Building Engineering Team

As identified within the plan, the office market is a huge potential growth area between 2016 and 2041. The plan references research stating that:

This (increased office employment) could translate into demand for between 4.7 and 6.1 million sqm of office floorspace over the period 2016 to 2041.

We agree with the proposal that boroughs support should new office provision, refurbishment and mixed use development to support this projected growth. We would support further policy or guidance that specifically encourages the refurbishment of existing office buildings as the following benefits, some of which complement other London Plan policy goals, can be realised:

· Higher proportion of existing buildings compared to new buildings, therefore greater scope for improving energy performance of overall office building stock if existing building performance is improved through fabric upgrades, energy efficiency, use of LZC technologies

· Reduced material and embodied energy where significant elements of buildings are reused

· Where significant structural elements can be retained this leads to reduced heavy goods vehicle traffic into the CAZ and other densely populated areas where air quality is also a big issue

Are there policies which could further specifically support refurbishment? An example may be to more formally recognise the benefits reduced embodied energy from refurbishment. A stronger statement on the benefits of improving energy performance of existing office buildings (due to their far greater number compared with new office buildings) would be welcomed.

We would support the implementation of policies which also required monitoring of improvements to existing office buildings as set out in SI2.

The plan refers to trends in different types of offices within the market. A recent British Council for Offices research report (Office Occupancy Density and Utilisation- Feb 2018) also acknowledges this but suggests that there is a general trend of convergence of densities and utilisation of office space where once there were more evident differences between sectors, building types and geographical locations. There may therefore be limited difference between the floor space required in different parts of London based on projected numbers of jobs. Table 6.1 suggests a difference in occupancy density which may not exist.

We would welcome more details on the proposal to support space suitability for SMEs.

User:	London Borough of Ealing

Offices
(E1 G3)

This clause runs the risk of being read in isolation and allowing developers to argue that a given site is ‘surplus’. The supporting text should make clear reference to the fact this must be based upon strategic assessments of need.

User:	Natural England

As with other forms of development, green infrastructure should be included in office areas wherever possible, building on the work of Greening the BIDs. Options include retrofitting (or incorporating into new builds) pocket parks, green roofs and walls, healthier walking routes and rain gardens. Interventions have indicated benefits such as employee satisfaction and desirability of premises.

User:	London Chamber of Commerce and Industry

Policy E1 Offices

74. As cited previously, we want a permanent exemption for Tech City and the Central Activities Zone from PDRs to protect vital work space37.

User:	Chairs of Camden's Conservation Area Advisory Committees

E1 F We welcome this policy on the introduction of appropriate Article 4 Directions to limit the loss of functioning work-space in specific areas.

E1 G 1 Draft policy: '… take into account the need for lower cost and affordable workspace …'
Our proposed amendments – reasoning: We would welcome a stronger support for affordable workspace, to ensure that development does not destroy local economies, local creative industry, and local communities and our diversity.
Our proposed revised text: '… take into account the need for lower cost and affordable workspace, and ensure provision for affordable workspace in developments …'

User: Glass and Glazing Federation

GGF response to Policy E1, part E:

- With the extension of Permitted Development Rights (PDRs), we are keen that the Mayor creates a planning framework – through the London Plan – that will stop local authorities forbidding the replacement of old windows for energy efficient windows where there would be no detriment to the external appearance of the building but there would be a detrimental effect on the building and its energy efficiency.
- Replacement windows and doors are allowed within the rules of PDRs provided they are of “similar appearance”, however when an Article 4 Direction is issued on an area or individual property, the ability to replace with windows or doors of similar design and appearance without planning consent is removed.
- We recognise that in some cases, PDRs are being used by developers without consideration for local communities. However, in the case of installing new energy efficient windows, PDRs are useful planning rules that can facilitate the upgrading of energy efficiency in London’s homes. We therefore suggest that the Mayor recognise Article 4 Directions are being applied in many instances where they are unnecessary.
- Although this is a responsibility for local authorities to issue Article 4 Directions, we believe the Mayor must use the London Plan to encourage local authorities to permit energy efficient windows to be installed that does not damage the appearance of buildings across the capital.

Recommendation: Use the London Plan to encourage London Boroughs to reduce the number of unnecessary Article 4 Directions that are issued which stop consumers being able to install energy efficient windows and glazing.

User:	Gravesham Borough Council

Office Market
The plan’s proposal that any office (or industrial) development larger than 2,500 sqm should consider scope to provide flexible space for SMEs is welcomed.

User:	Sustrans

Sustrans strongly supports the policy of requiring office development to be supported by walking, cycling and public transport connectivity and capacity both in (C) central London and (D) inner and outer London; We also strongly support (D3) the requirement to take steps toward greater transport sustainability in existing urban business parks.

User:	Sustrans

We strongly support the requirement for office growth in Outer London to be supported by improvements to walking, cycling and public transport connectivity and capacity, however, it is not clear how capacity is defined with reference to cycle routes; this should reference the London Cycle Design Standards and/or Healthy Streets Approach.

User: Dr Jessica Ferm

1. **Policy E1 on Offices** provides a welcome focus on office markets in inner and outer London, clearly trying to move away from an overemphasis on the CAZ in the previous London Plan. However:

1. it still gives the impression that there are limited office clusters in London, which are the focus for policy, and *overlooks the fact that offices are dispersed across London's high streets, industrial estates, and in residential areas, rather than falling neatly within defined town centre office locations or business parks*.
2. It talks about 'clusters of world city businesses' without defining what those are, and without acknowledging adequately the "non-world city businesses" that also occupy office space and provide important jobs (and service financial and business services in the CAZ/Isle of Dogs). It could also make brief reference to the various industrial and service-sector business that support such offices.
3. Guidance for boroughs on introducing Article 4 Directions to protect offices from office-to-residential permitted development seems to suggest that they should focus on 'office clusters'. However, in some boroughs, it is the vulnerability of very small and dispersed offices (providing one or two residential units) that is of concern (e.g. Camden, as reflected in forthcoming 2018 report by UCL for RICS).

User:	Landsec
E1 Offices: We strongly support this policy and the recognition of the importance of offices as part of the CAZ. We do however query the suitability of part G, which refers to lower cost and affordable workspaces.	

User: Mr Gary Hayes

Policy E1 – Offices

Competitiveness of office space is promoted and increases in stock encouraged, as are apparent ‘unique agglomerations and dynamic clusters of world city businesses and other specialist functions’. It is very difficult to see how this will impact positively on the points highlighted above from the supporting text of policy E11.

There is also a fair amount of office space owned by the public sector (which is more likely to employ people from households with lower and middle incomes) yet seemingly not ‘competitive’. The Mayor, however sees these (as set out in the London Housing Strategy) simply as opportunities to sell off for housing development.

User: Redrow Homes London Division.

The draft policy implies that development proposals must identify demand for new offices. In practice this will generally imply a need test is carried out, given much development does not have a designated end-user at the planning application stage. It is perverse to suggest one given that paragraph 6.1.2 states that ‘it is important that the planning process does not compromise potential growth’.

There are at least five important points here:

- very few applicants would progress development if they did not foresee demand;
- new stock refreshes London’s offer and enhances its appeal to businesses and thus the city’s economic competitiveness;
- if new development reduces demand for secondary or tertiary stock beyond the site then this may reduce rents and so bring benefits in terms of affordability;
- reduced demand for secondary or tertiary stock makes it more likely that such stock will be brought forward for redevelopment; and
- on a macro-level London requires new office floorspace and if targets are to be achieved then it is illogical to assume that a need test is applied at the micro level.

Part B of Policy E1 should be revisited so that there is no need to demonstrate demand or need for new office development. The NPPF provides national policy on this point.

User:	Sean Creighton

In their evidence submitted to the Croydon Local Plan consultation and examination CTUC/CA argued for the need for lower cost, affordable small workspaces at affordable rents. This need was also recognised by the Croydon Small Business Commission.

User: Andrea Carey Fuller

Competitiveness of office space is promoted and increases in stock encouraged, as are apparent ‘unique agglomerations and dynamic clusters of world city businesses and other specialist functions’. It is very difficult to see how this will impact positively on the points highlighted above from the supporting text of policy E11.

There is also a fair amount of office space owned by the public sector (which is more likely to employ people from households with lower and middle incomes) yet seemingly not ‘competitive’. The Mayor, however sees these (as set out in the London Housing Strategy) simply as opportunities to sell off for housing development.

User: Cross River Partnership

This overall Policy should be supported. The inclusion in it of a requirement that Boroughs should consult upon and introduce Article 4 Directions to ensure that the CAZ and other relevant areas are not undermined by office to residential permitted development rights, is crucial to maintaining and enhancing the inner London economy. Given the strategic importance of its continued success, this Policy, in particular, is fully supported.

In the context of expiring permitted development rights, the Plan should set out a firm commitment to supporting Boroughs representing key strategic pockets, within or outside the CAZ, in securing Article 4 Directions. We hope this can be reconciled with ambitious plans for affordable housing in London (e.g. a 66,000 home target).

It is encouraging that the GLA is prioritising efforts to maintain office floorspace – but the plan needs a more robust approach to addressing the challenge of making a total 5 million sqm available by 2041.

The majority of companies in the capital rent, so non-property owners are getting pushed further out of more desirable places to do business.

User: L&Q

Demonstrating demand for office development

The draft policy implies that development proposals must identify demand for new offices. In practice this will generally imply a need test is carried out, given much development does not have a designated end-user at the planning application stage. It is perverse to suggest one given that paragraph 6.1.2 states that ‘it is important that the planning process does not compromise potential growth’. There are five important points here:

- very few applicants would progress development if they did not foresee demand;
- new stock refreshes London’s offer and enhances its appeal to businesses and thus the city’s economic competitiveness;
- if new development reduces demand for secondary or tertiary stock beyond the site then this may reduce rents and so bring benefits in terms of affordability;
- reduced demand for secondary or tertiary stock makes it more likely that such stock will be brought forward for redevelopment; and
- on a macro-level London requires new office floorspace and if targets are to be achieved then it is illogical to assume that a need test is applied at the micro level.

Part B of Policy E1 should be revisited so that there is no need to demonstrate demand or need for new office development. The NPPF provides national policy on this point.

User:	WeAreWaterloo Business Improvement District

Further to this discussion of Policy SD5 above, We Are Waterloo would also like to voice support for Policy E1 – Offices insofar as this policy encourage the protection of existing, viable office and retail uses, through targeted Article 4 Directions for removing Permitted Development Rights where appropriate.
Whilst We Are Waterloo appreciates the need to provide housing across London, Waterloo's function as a business hub is emphasised, and protection of existing office development is mandatory to ensure it remains a viable business location.

User:	dp9

Policy E1 – Offices

We support the promotion and development of London’s office stock, in particular where it creates or reinforces a unique agglomeration or dynamic cluster of economic activity. We also support a flexible approach to lower cost and affordable workspace, being a matter to be taken into account and applied where appropriate rather than all office development being required to provide such floorspace.

User: Taylor Wimpey UK

Policy E1 Offices

This policy and supporting text should be revised to include opportunities where a net loss of office space may be appropriate to reflect paragraph 22 of NPPF and other circumstances including off site provision, intensification of use, viability, or design constraints to bring forward housing and mixed use opportunities.

User: Workspace Group

Policy E1: Offices

This policy aims to improve the quality offer of offices across London an focuses on key office locations as well as locally orientated office provision to meet local needs. It also notes that surplus office space should be released to other uses (E), that there should be a consideration of the scope for the re-use of otherwise surplus large office space for smaller units (G2) and provides support for redevelopment, intensification and change of use of surplus office space to other uses such as housing (G3). Workspace Group has considerable experience in renovating large scale office space for SMEs and also intensifying sites to provide new housing and improved employment space. These policy threads are supported, however we consider that reference to the competitiveness of office accommodation in part A should be deleted as it is not relevant to the land use based policy. Our client suggests that the policy is amended as follows:

"A Improvements to the ***~~competitiveness and~~*** *quality of office space of different sizes (for micro, small, medium-sized and larger enterprises) should be supported by new office provision, refurbishment and mixed-use development." [our amendments are shown in Bold]*

User: Kingston First

In addition to its role as a major retail centre, Kingston Town Centre also provides a large number of office jobs.

Figure A1.4 of the draft Plan identifies Kingston Town Centre as an area where office guideline 'B' should apply. This states that there is 'mixed-use potential' where there is capacity, demand and viability to accommodate new office development' generally as part of mixed -use developments including residential use.

Historically offtce floorspace has been provided through a range of office sizes, both within converted and purpose-built facilities. In recent years the introduction of permitted development rights, enabling a change of use from office to residential use, has affected the amount of office floorspace available within the town centre. The centre is now subject to an Article 4 direction which prevents this change of use taking place without planning permission, however the changes of use which did take place have affected the balance of existing 'mixed-use' developments and may also have affected the amount of smaller and more affordable workspace available to businesses.

Kingston First therefore supports the wording of draft Policy E1 and the need to plan for new mixed-use developments. Any larger office developments should show flexibility in adapting to future tenants, of various sizes, and ensuring that they are fit for purpose. Retail a d other commercial units should be the focus for ground floor units to ensure that there the streetscape remains active and vibrant, and to ensure that the provision of office floorspace does not jeopardise the retail or commercial function of the centre. Kingston First supports the provision of new low-cost and affordable office space set out within draft Policies E2 and E3.

User:	London and Continental Railways

Draft London Plan Policy E1 sets out that existing office floorspace should be retained, facilitating the redevelopment, renewal and re-provision of office space where viable and releasing surplus office capacity to other uses. While the draft policy refers to the release of ‘surplus’ stock, there is ambiguity as to its definition and how this is identified. We consider that, in a similar approach to that suggested under our client’s LLDC Local Plan representations, the policy should also refer to the release where sites are allocated for other uses, in which case the proposed uses should fall within the parameters identified within the relevant site allocation policy. This is key to ensuring that part G 3) of Policy E1 is met i.e. supporting the redevelopment, intensification and change of use of surplus office space to other uses including housing, by ensuring that boroughs undertake a comprehensive site allocations’ review to identify sites suitable for housing, employment, retail etc.

User:	London Borough of Camden

Camden supports the objectives of this policy. Consolidation of diverse office markets may have an impact on the affordability of office floorspace and the diversity of location.

User:	Battersea Project Land Company Limited

Policy E1 – Offices
We support the promotion and development of London’s office stock, in particular where it creates or reinforces a unique agglomeration or dynamic cluster of economic activity. We also support a flexible approach to lower cost and affordable workspace, being a matter to be taken into account and applied where appropriate rather than all office development being required to provide such floorspace.

User:	Age UK London - a charity working with older Londoners

47. E1 LINK TO POLICY CHANGE It is considered that live/work units provide a flexible work opportunity for the Capital and that these should now incorporate age and disability friendly design features in order to be socially inclusive.

User: Pat Turnbull

Policy E1 Offices

This section, as the first section of this policy, specifically mentioning ‘world city businesses’ indicates the priorities of the writers of this plan. They are not with large sections of the London population and jobs that serve that population.

User:	Canary Wharf Group

17.We note that Table 6.1 of the Draft London Plan sets out the office employmentprojections for the Plan period based on the London Office Policy Review 2017 (LOPR).On reviewing the LOPR, the employment projection for the NIOD CAZ (2016-41) is78,600 jobs (LOPR Figure 9.28). As the NIOD will deliver most of the employmentprojected for the Isle of Dogs and South Poplar Opportunity Area, the employment targetshould be revised in line with the supporting evidence base and that consistentmethodologies are using throughout the Plan. Setting unrealistic targets, which aren’trobustly backed up by evidence would find the Plan unsound and these must becarefully reviewed and policy revised accordingly.

User:	Primrose Hill Conservation Area Advisory Committee

Chapter 6 Economy

E1 F We welcome this policy on the introduction of appropriate Article 4 Directions to limit the loss of functioning work-space in specific areas.

E1 G 1 Draft policy: '… take into account the need for lower cost and affordable workspace …'

Our proposed amendments – reasoning: We would welcome a stronger support for affordable workspace, to ensure that development does not destroy local economies, local creative industry, and local communities and our diversity.

Our proposed revised text: '… take into account the need for lower cost and affordable workspace, <u>and ensure provision for affordable workspace in developments</u> …'

User:	Regent's Park Conservation Areas Advisory Committees

Chapter 6 Economy

E1 F We welcome this policy on the introduction of appropriate Article 4 Directions to limit the loss of functioning work-space in specific areas.

E1 G 1 Draft policy: '… take into account the need for lower cost and affordable workspace …'

Our proposed amendments – reasoning: We would welcome a stronger support for affordable workspace, to ensure that development does not destroy local economies, local creative industry, and local communities and our diversity.

Our proposed revised text: '… take into account the need for lower cost and affordable workspace, and ensure provision for affordable workspace in developments …'

Policy E2 Low-cost business space

User:	Hornsey & Wood Green Labour Party

We support para B which provides for the re-provision of lower-cost B1 space (including creative and artist studio space in development proposals for areas where there is an identified shortage of such space. There are particular pressures on such space in many parts of London but smaller occupiers and creative businesses, essential to the functioning of many urban districts, are sensitive to price rises.

User:	Dr Jessica Ferm

1. The introduction of **policy E2 on low-cost business space** is welcome, helping to clarify the difference between affordable workspace provided through planning obligations (policy E3) and business space that is relatively low-cost due to its location. However, the policy states that 'the provision, and where appropriate, protection of a range of low-cost B1 business space should be supported to meet the needs of micro, small and medium sized enterprises…". How viable is it to 'provide' new low-cost business space without cross-subsidy? Perhaps *the policy should focus on strengthening the protection of existing space*, and leave the provision part for policy E3 (to be delivered as subsidised affordable workspace through planning obligations).

User:	Landsec

E2 Low Cost business space and E3 Affordable Workspace: we understand what the plan is trying to achieve in both areas, but agree strongly with the representations made by BPF, the Alliance and London First in this area. We believe the policies could have the unintended consequence of limiting the supply of land to deliver regeneration and new commercial floorspace.

User: Mr Gary Hayes

Policy E2 Low-cost business space

We support the provision of low-cost business space and propose that ‘where appropriate’ in section E2A be removed.

We would like to see text from 6.2.2 - ‘locations such as back-of town centre and high street locations, railway arched, heritage buildings in the CAZ and smaller scale provision in industrial locations’ – specifically mentioned / protected in the policy.

User: Redrow Homes London Division.

Object

Space is generally ‘low-cost’ because it is less desirable to the market. It is perverse to protect this as the effect will generally be to discourage the redevelopment of the least desirable floorspace in the city. Some of the benefits of redevelopment are outlined above. Businesses including SMEs and creative businesses will also typically make rational decisions about the workspace they occupy. It makes sense for many to hunt out the most suitable and affordable opportunities available and relocate as circumstances change. In some situations, they may also benefit because a landlord offers preferential arrangements to a tenant for their own reasons. Either of the above scenarios may equally apply to artists. The draft London Plan threatens to specifically reduce the options available to creative businesses and artists. This is because landlords may prefer to leave buildings empty, rent to alternative occupiers or evict existing tenants if they believe that allowing such tenants to let from them reduces their site’s long-term asset value (which will be influenced by opportunities to redevelop and change use). There are myriad reasons why a landlord will not want to see their asset value reduced, including the ability to borrow against it.

For similar reasons, landlords are perversely disincentivised by the draft London Plan to offer discounts or other special arrangements to tenants. Otherwise they are at risk of such arrangements becoming ‘protected’ rather than voluntary.

The relevant sections must be deleted from the London Plan in order to avoid the perverse consequences we have identified. The objective to encourage low-cost floorspace will be much better served by increasing the overall supply of floorspace. This process will see primary stock come to be considered secondary stock and so on.

User: Redrow Homes London Division.

The draft London Plan is vague. Applicants should ‘consider’ providing low cost space, ‘may’ seek affordable workspace and should ‘consider’ the scope to provide smaller (sub-2,500 sq m) industrial space.
No clear detail is provided on appropriate ratios for the above and with low-cost or affordable space on rents to be charged. This will not help good decision-making.
No clear detail is provided on the definition of “affordable workspace”. Developers will find it extremely difficult to factor this type of provision into scheme’s viability if this is not made clear.

If the draft London Plan is to address these matters then its policies must either provide clear guidance or explicitly leave these matters to be addressed by Boroughs individually.

User:	Sean Creighton

In their evidence submitted to the Croydon Local Plan consultation and examination CTUC/CA argued for the need for lower cost, affordable small workspaces at affordable rents. This need was also recognised by the Croydon Small Business Commission.

User:	Andrea Carey Fuller

We support the provision of low-cost business space and propose that ‘where appropriate’ in section E2A be removed.

We would like to see text from 6.2.2 - ‘locations such as back-of town centre and high street locations, railway arched, heritage buildings in the CAZ and smaller scale provision in industrial locations’ – specifically mentioned / protected in the policy.

User: Workspace Limited

Criteria B of the Policy E2 sets the policy basis for assessment of planning applications that result in the loss of existing Class B1 (including creative and artist studio space) in areas where there is an identified shortage of lower-cost space. Specifically it states that such proposals should:

1. demonstrate that there is no reasonable prospect of the site being used for business purposes, or

2. ensure that an equivalent amount of B1 space is re-provided in the proposal (which is appropriate in terms of type, specification, use and size), incorporating existing businesses where possible, or
3. demonstrate that suitable alternative accommodation (in terms of type, specification, use and size) is available in reasonable proximity to the development proposal and, where existing businesses are affected, that they are subject to relocation support arrangements before the commencement of new development.
It is unclear what constitutes an identified shortage or how this is to be tested or defined (i.e. by Borough?). Moreover it is unclear what the difference between ‘low cost’ and ‘affordable’ workspace is. The definition of low cost is ‘secondary and tertiary space, which is of a lower specification than prime space’ (para 6.2.1). Whilst, affordable workspace is ‘that provided at rents maintained below the market rate for that space for a specific social, cultural, or economic development purpose’ (Para 6.3.1). In this respect the two are not necessary mutually exclusive and it is not clear how such policies will be applied in such situation.

Put simply, the above draft policy E2 together with Policy E3 has the effect of bringing into the control of planning how floorspace is let, to whom (existing occupiers), rental levels (arguably to retain existing occupiers) and business relocation. These are matters currently controlled through the provisions of the landlord and tenant act and are not matters for planning control.

Where existing floorspace is considered ‘low-cost’ or ‘affordable’ this is because it reflects the location and/or type of accommodation itself. For example it is often where the rent is appropriate for the quality of the space / associated support services on offer. These existing tenant agreements and rental levels fall outside of control of the planning system. They are not controlled by extant planning permissions (conditions/S106) but are a function of the price that the market is willing to pay for the accommodation. To seek to artificially recreate an existing situation or rental level in a redevelopment proposal and enshrine this into planning control through conditions / S106 Agreement is arbitrary and does not have regard to the fair operation of the market or the implications for scheme viability.

It is perverse to protect this as the effect will generally be to discourage the redevelopment of the least desirable floorspace in the city.

Businesses including SMEs will typically make rational decisions about the workspace they occupy. It makes sense for many to hunt out the most suitable and affordable opportunities available and relocate as circumstances change. In some situations, they may also benefit because a landlord offers preferential arrangements to a tenant for their own reasons. Either of the above scenarios may equally apply to creative industries and artists that Policy E3 seeks to protect.

The draft London Plan threatens to reduce the options available to SMEs creative businesses and artists. This is because landlords may prefer to leave buildings empty, rent to alternative occupiers or evict existing tenants if they believe that allowing such tenants to let from them reduces their site’s long-term asset value (which will be influenced by opportunities to redevelop and change use). There are myriad reasons why a landlord will not want to see their asset value reduced, including the ability to borrow against it.

For similar reasons, landlords are perversely disincentivised by the draft London Plan to offer discounts or other special arrangements to tenants. Otherwise they are at risk of such arrangements becoming ‘protected’ rather than voluntary.

The objective to encourage low-cost floorspace will be much better served by increasing the overall supply of floorspace. This process will see primary stock come to be considered secondary stock and so on. Moreover securing low cost or affordable workspace in redevelopment schemes having regard to scheme viability and the wider public benefits of a scheme.

User: Lendlease

We support the ambition of ensuring sufficient business space is available for a range of occupiers. However, the current wording of this policy is very onerous, could lead to unintended consequences and appears to seek to redefine the Use Classes Order with the introduction of references to secondary and tertiary space. Furthermore, the purpose of planning policy is to control the use of land it does not extend to the micro-management of leasing to commercial tenants. There is separate legislation which relates to tenant and landlord rights.

The onerous nature of this policy could restrict the availability of cheaper short-term leases in buildings being considered for redevelopment. It could also restrict new development, even where it provides a net uplift in business floorspace. The result would thereby be the potential protection of a few tenants in specific situations while the overall availability of business space for occupiers decreases. These unintended consequences would be particularly unfortunate given the overriding aim of the plan is to deliver intensification of uses to meet ambitious growth targets.

Furthermore, by going beyond and perhaps seeking to amend the planning's legislative framework it exceeds the scope of the planning system. As such, it is unclear how the decision taker should act to enforce a policy which goes beyond land use issues. We suggest it is changed as follows, so it is focused on the retention of business space in a way which is compatible with the Use Classes Order and paragraph 22 of the NPPF:

A The provision, and **continued availability of** ~~where appropriate, protection of a range of low-cost~~ B1 business space should be supported to meet the needs of micro, small and medium-sized enterprises and to support firms wishing to start-up or expand.
B Development proposals that involve the **net** loss of existing B1 space (~~including creative and artist studio space~~) in areas where there is an identified shortage of lower-cost space should:
1) demonstrate that there is no reasonable prospect of the site being used for business purposes, or
2) ensure that an equivalent amount of B1 space is re-provided in the proposal (~~which is appropriate in terms of type, specification, use and size), incorporating existing businesses where possible, or~~

3) demonstrate that suitable alternative accommodation (~~in terms of type, specification, use and size~~) is available in reasonable proximity to the development proposal ~~and, where existing businesses are affected, that they are subject to relocation support arrangement before the commencement of new development.~~

C Development proposals for new B1 business floorspace greater than ~~2,5~~ 3,000 sqm (gross external area) should consider **providing a proportion of flexible business space** ~~the scope to provide a proportion of flexible workspace suitable for micro, small and medium sized enterprises~~.

These changes would ensure the policy is sound and enforceable. The supporting text should also be amended accordingly.

In addition, clarity is sought in relation to meanwhile uses, if creative and low cost business spaces are provided as meanwhile uses, forming part of a longer term regeneration storey, is the intention that these will need to be re-provided with no not loss of floorspace. This is also the case for policy E3 where clarity on the issue of affordable workspace is sought.

User: Cross River Partnership

The provision of sufficient space for smaller businesses is vital. However, the Policy does not acknowledge that – especially in the CAZ - there may be conflicts when new large-scale developments are proposed, which, while beneficial for the overall economic prosperity of the London, have the immediate impact of reducing space for small and start-up businesses, as a site is assembled and cleared for a new, larger development. The Policy should be amended to allow – at least in the CAZ – for this exemption to be applied in clearly defined circumstances.

Policy E2 – we are supportive of, and would like recognition given to, the potential roles of railway arches, subways, tunnels and basements in contributing to the delivery of Policy E2, and their role in securing economic objectives. Please see https://crossriverpartnership.org/projects/light-at-the-end-of-the-tunnel-let/ OR https://crossriverpartnership.org/media/2014/09/LET-Celebration-Document.pdf for successful case studies.

Policies E2 & E3 – we are supportive of efforts to provide affordable business space and extend this to retail - small floor plates and the benefits of retail diversity could be further highlighted.

User: Workspace Providers Board

Wider Economic Policies including Low-cost business space (Policy E2)

We recognise the ongoing pressure for the redevelopment of employment land and properties (industrial and commercial) for higher value uses. We welcome policies that retain employment land and buildings.

We support the Draft London Plan's office policies for the retention of viable office capacity, and encouraging the use of article 4 directions to suspend Permitted Development Rights, especially in Outer London Boroughs where this tool can be used to retain the supply of employment spaces. We encourage the GLA to monitor article 4s, and to act strategically by proposing areas where boroughs might look to bring forward article 4 directions. We suggest that the GLA create a map of article 4 directions, overlaid on a map of commercial uses, to help identify gaps in article 4s; this map should be maintained and monitored as an ongoing management tool.

We note that commercial rents may not be sufficient to sustain existing uses where residential values are high. Therefore there is a need for policies to retain and promote the supply of low-cost business space, by the cross subsidy of business space within mixed development schemes and by the refusal of redevelopment schemes where re-provision of business space onsite or offsite within the wider area cannot be secured.

We are supportive of Policy E2 which states that development proposals that involve the loss of existing low cost business space in areas where there is an identified shortage should either demonstrate that there is no reasonable prospect of the site being used for business purposes, and ensure that an equivalent amount of business space is re-provided, or demonstrate that suitable alternative accommodation is available in reasonable proximity.

We believe it would be helpful to define "reasonable proximity" as close as possible to the site within 2 miles, although this can vary by sector the vast majority of small businesses are dependent on a network of staff, suppliers and customers, which risk being broken if they relocate great distances, putting the continuity of the business at risk.

We also note that it is highly unlikely that "suitable alternative accommodation is available" in "areas where there is an identified shortage".

Summary of tracked changes to Policy E2

Policy E2 Low-cost business space

A The provision, and where appropriate, protection of a range of low-cost B1 business space should be supported to meet the needs of micro, small and medium-sized enterprises and to support firms wishing to start-up or expand.

B Development proposals that involve the loss of existing B1 space (including creative and artist studio space) in areas where there is an identified shortage of lower-cost space should:

1) demonstrate that there is no reasonable prospect of the site being used for business purposes, or

2) ensure that an equivalent amount of B1 space is re-provided in the proposal (which is appropriate in terms of type, specification, use and size), incorporating existing businesses where possible, or

3) demonstrate that suitable alternative accommodation (in terms of type, specification, use and size) is available ~~in reasonable proximity~~ as close as possible to the development proposal or within 2 miles and, where existing businesses are affected, that they are subject to relocation support arrangements before the commencement of new development.

C Development proposals for new B1 business floorspace greater than 2,500 sqm (gross external area) should consider the scope to provide a proportion of flexible workspace suitable for micro, small and medium-sized enterprises.

6.2.1 Smaller occupiers and creative businesses are particularly vulnerable and sensitive to even small fluctuations in costs. To deliver a diverse economy, it is important that cost pressures do not squeeze out smaller businesses, particularly from fringe locations around central London, but also across the capital as a whole. Ensuring a **sufficient supply of business space** of different types and sizes will help to ensure that workspace is available for occupation at an appropriate range of rents reflecting the specification, quality and location of the space.

6.2.2 **Low-cost business space** refers to secondary and tertiary space, which is of a lower specification than prime space. It is often found in locations such as back-of town centre and high street locations, railway arches, heritage buildings in the CAZ, and smaller-scale provision in industrial locations. It usually commands rents at or below the market average.

6.2.3 There is evidence that the conversion of occupied or partially-occupied offices to residential use, through **permitted development rights**, is having a particular impact on secondary space in outer London and on the fringes of the CAZ. This policy is intended to operate in those parts of

London where there are particular cost pressures and a shortage of lower- cost secondary or tertiary space available for occupation. It will be most effective in those parts of London where boroughs have removed office or light industrial to residential permitted development rights through Article 4 Directions.

6.2.4 Where there is demand for workspace or viable existing business uses on site, development proposals for alternative uses should deliver an equivalent amount of workspace through the **intensification or reconfiguration of space**. Part B.3 of the policy applies in exceptional circumstances, where it can be demonstrated that it is not feasible to accommodate replacement workspace and existing businesses on-site through intensification or reconfiguration. ~~What constitutes a reasonable proximity should be determined on the circumstances of each case having regard to the impact on business supply chains and access to labour supply~~. Relocation arrangements should be put in place prior to the commencement of development to ensure that disruption to existing businesses is minimised.

6.2.5 Larger-scale commercial development proposals should consider the scope to incorporate a **range of sizes of business units**, including for SMEs. Flexible workspace can include a variety of types of space including serviced offices and co-working space. What constitutes a reasonable proportion of workspace suitable for SMEs should be determined on the circumstances of each case.

6.2.6 If business space is demonstrated to be obsolete or surplus to requirements, it should be **redeveloped for housing and other uses**. Evidence to assess the reasonable prospect of workspace being used for business purposes should include strategic and local assessments of demand and supply, and evidence of vacancy and marketing (for at least 12 months at market rates suitable for the type, specification, use and size, and including incentives for any refurbishment required). This evidence should be used to inform viability assessments.

User:	Oneill Homer

E2 The Plan (and wider Government planning policy) contains threats to established small businesses. To be effective, this policy will benefit from the local knowledge that a neighbourhood plan can capture to qualify the value of business locations and types to identify opportunities to protect, change and grow local business space.

User: Camden Town Unlimited and Euston Town Business Improvement Districts

We strongly support the draft Plan's intention to help retain viable office capacity. For instance, the use of Article 4 Directions to suspend Permitted Development Rights and to ensure that planning permission is required, are a particularly effective tool.

In areas outside the City Fringe and CAZ, these exemptions can be used to retain the supply of workspace, and ultimately, employment. To help ensure this remains a reality we would encourage the GLA to monitor Article 4s, and to act strategically by proposing areas where Boroughs might look to bring forward such Directions.

We are also supportive of Policy E2 Part B which states in areas of an identified shortage of lower-cost space there are strict requirements placed on development proposals, with the intention of ensuring the future provision of B1 working space on the site itself or at an alternative location.

However, we are unclear what mechanism or tool the GLA and Boroughs will use to identify areas that meet the criteria of lower cost business space. Strong guidelines will be required to ensure this intention is fulfilled and to provide consistency across London and clarity for developers.

With regard to policy E2 Part B3, we believe it would be helpful to define "reasonable proximity" as within one or two miles, as many small businesses are dependent on a network of staff, suppliers and customers, which risk being broken if they have to relocate a substantial distance, putting the continuity of the business at risk.

User: Unknown

Our client agrees in principle with ensuring that small businesses have the businesses space they need to operate and expand, however there are potentially unintended consequences that could arise from the implementation of this draft policy. There is a likelihood that this policy could lead to a reduction in B1 space being retained/ developed/created in new projects, due to the viability constraints that could be placed on regeneration projects and new developments. Protecting existing, low value uses, will add a significant burden to development proposals by both reducing the value of the proposal and potentially increasing costs as additional design measures need to be considered to accommodate the different uses on site. This will either prevent new commercial development or come at the expense of other policy and financial contributions that the development could otherwise make. The unintended consequence of this is that businesses who qualify for lost-cost space may have their chances of securing new premises lessened, as existing landlords could become very wary of leasing them new spaces when a new development is being conceived. Also, this may lead to these businesses being served notice to leave buildings as a precautionary measure (by landlords) against potentially having to re-provide new floorspace for similar users.

User: L&Q

Protecting lowcost business space

Space is generally ‘low-cost’ because it is less desirable to the market. It is counterproductive to protect this as the effect will generally be to discourage the redevelopment of the least desirable floorspace in the city. Additionally, the reprovision of affordable workspace will require crosssubsidy, which in turn will reduce the amount available for affordable housing. Businesses including SMEs and creative businesses will also typically make rational decisions about the workspace they occupy. It makes sense for many to hunt out the most suitable and affordable opportunities available and relocate as circumstances change. In some situations, they may also benefit because a landlord offers preferential arrangements to a tenant for their own reasons. Either of the above scenarios may equally apply to artists. The draft London Plan threatens to specifically reduce the options available to creative businesses and artists. This is because landlords may prefer to leave buildings empty, rent to alternative occupiers or evict existing tenants if they believe that allowing such tenants to let from them reduces their site’s long-term asset value (which will be influenced by opportunities to redevelop and change use). There are numerous reasons why a landlord will not want to see their asset value reduced, including the ability to borrow against it. For similar reasons, landlords are perversely disincentivised by the draft London Plan to offer discounts or other special arrangements to tenants. This includes ‘meanwhile’ uses or otherwise interim arrangements. Otherwise they are at risk of such arrangements becoming ‘protected’ rather than voluntary.

The relevant sections must be deleted from the London Plan in order to avoid the counterproductive consequences we have identified alongside, which could affect all subsidised tenancies, ‘meanwhile’ or interim uses and the letting of any space to creative industries or artists. The objective to encourage low-cost floorspace will be much better served by increasing the overall supply of floorspace. This process will see primary stock come to be considered secondary stock and so on.

User: L&Q

Providing lowcost space, affordable business space and smaller industrial space

The draft London Plan is vague. Applicants should ‘consider’ providing low cost space, ‘may’ seek affordable workspace and should ‘consider’ the scope to provide smaller (sub-2,500 sq m) industrial space. No clear detail is provided on appropriate ratios for the above and with low-cost or affordable space on rents to be charged. This will not help good decision-making.

If the draft London Plan is to address these matters then its policies must either provide clear guidance or explicitly leave this matter to be addressed by Boroughs individually.

User:	Vital OKR
We note that town centre policy does not align with E2, as there is no mention there of the need to protect and plan for low?cost business space. Likewise the helpful text in para 6.2.1 finds no echo in the town centre policies and supporting text. This should be corrected.	

User: Taylor Wimpey UK

Policy E2 low-cost business space

Para B 2)

This policy requires an equivalent amount of B1 space to be re-provided whe re proposals include the loss of existing B1 space.

We believe the policy should be more flexible to encourage the redevelopment of old and under used or in-efficient B1 stock. This should not necessarily require a like for like replacement of B1 floor space to yield equivalent or improved benefits in terms of job opportunities from more efficient modern facilities. Regard should also be given as to whether replacement like for like is viable and represents the most appropriate and best use of a site.

The policy should also reflect the potential to relocate B1 uses off site that may allow a more efficient use of the development site.

User: Workspace Group

Policy E2: Low Cost Business Space

Draft Policy E2 resists the loss of low cost B1 space in areas where there is an identified shortage of lower cost space. Whilst the overarching aim of this policy is to ensure that there is a range of business space available to meet the needs of SMEs, which is supported, we consider that the policy as worded will not be deliverable and could result in adverse impacts on the London business space market.

Firstly we consider that the specific reference to “including creative and artist studio space” should be deleted, as there is no policy basis to refer to these specific types of employment space as a priority over other forms of economic activity. Other policies in the draft plan promote and support the cultural functions of London, in any event.

Draft policy E2B in effect protects low cost business space in areas where there is an identified shortage of lower-cost space, or sets out a series of policy requirements to ensure re-provision of an equivalent amount and specification of B1 floorspace in the proposal, a suitable range of alternative and comparable accommodation in the area, and where relevant, support arrangements for the relocation of a tenant to an alternative local equivalent accommodation. These requirements are not practical or reasonable. On this basis the Policy is considered to be unsound and undeliverable and will inhibit the development of new or improved employment space.

Furthermore the policy should be re-worded in land use policy terms to ensure that it protects business use rather than seeking to provide protection for occupiers. The Landlord and Tenant Act 1985 provides protection for individual occupiers and the planning system should not seek to intervene with this separate area of legislation.

Policy E2C requires that development proposals for new B1 business floorspace greater than 2,500sqm (GEA) should consider the scope to provide a proportion of flexible workspace suitable for micro, small and medium sized enterprises. While it is acknowledged that the 2500sqm area is a guide for considering scope, in practice its inclusion will be adopted by Councils as a standard policy threshold requirement. We object to Policy E2C. It is not considered to be justified (there is no evidence base justification for the arbitrary 2,500sqm threshold), will affect the viability of office provision and seeks to intervene with the office and business space market forces.

We consider it more appropriate to have a general policy that promotes and maintains a range of viable business space available to meet the needs of SMEs. This overarching policy can then be developed in more detail by individual Councils to address local circumstances.

User: Kingston First

In addition to its role as a major retail centre, Kingston Town Centre also provides a large number of office jobs.

Figure A1.4 of the draft Plan identifies Kingston Town Centre as an area where office guideline 'B' should apply. This states that there is 'mixed-use potential' where there is capacity, demand and viability to accommodate new office development' generally as part of mixed -use developments including residential use.

Historically offtce floorspace has been provided through a range of office sizes, both within converted and purpose-built facilities. In recent years the introduction of permitted development rights, enabling a change of use from office to residential use, has affected the amount of office floorspace available within the town centre. The centre is now subject to an Article 4 direction which prevents this change of use taking place without planning permission, however the changes of use which did take place have affected the balance of existing 'mixed-use' developments and may also have affected the amount of smaller and more affordable workspace available to businesses.

Kingston First therefore supports the wording of draft Policy E1 and the need to plan for new mixed-use developments. Any larger office developments should show flexibility in adapting to future tenants, of various sizes, and ensuring that they are fit for purpose. Retail and other commercial units should be the focus for ground floor units to ensure that there the streetscape remains active and vibrant, and to ensure that the provision of office floorspace does not jeopardise the retail or commercial function of the centre. Kingston First supports the provision of new low-cost and affordable office space set out within draft Policies E2 and E3.

User: London and Continental Railways

We also consider a similar approach should be applied to draft Policy E2 (low-cost business space). This policy seeks to secure the provision, and where appropriate protection, of low-cost B1 business space to support SMEs, with proposals which result in the loss of B1 floorspace in areas where there is an identified shortage of lower-cost space:

1 demonstrating that there is no reasonable prospect of the site being used for business purposes, or

2 ensuring that an equivalent amount of B1 space is re-provided in the proposal, incorporating existing businesses where possible, or

3 demonstrating that suitable alternative accommodation is available in reasonable proximity to the development proposal and, where existing businesses are affected, that they supported in their relocation.

We do not consider this ‘blanket’ policy approach should be applied, as it could restrict any future development to the re-provision of space of a similar type/character. This policy should be amended to exclude existing temporary/meanwhile uses, ensuring these would not limit the potential for the delivery of different uses on a site as part of a permanent redevelopment scheme. This same amended approach should be taken to draft Policy E3 (affordable workspace).

User: London Borough of Camden

The provision and protection of low cost B1 business space is supported.

The policy requires the applicants to demonstrate that where the proposal involves loss of B1 floorspace, suitable alternative B1 accommodation (in terms of type, specification, use and size) is available in reasonable proximity to the development proposal and, where existing businesses are affected, that they are subject to relocation support arrangements before the commencement of new development. This approach assumes that the businesses which are affected by the proposal are in need of relocation support. Therefore, as drafted it may put unnecessary burden on the applicants to provide support to those which do not need it.

Criterion C requires proposals for new B1 business floorspace greater than 2,500 sqm (as opposed to Camden's 1,000 sqm threshold) to consider the scope to provide a proportion of flexible workspace suitable for micro, small and medium sized enterprises. It is stated that what constitutes a reasonable proportion of workspace suitable for SMEs should be determined on the circumstances of each case. Although the flexible nature of this policy may benefit discussions with the applicants it does however create a level of uncertainty with regards to what is acceptable and what is not.

The Draft Plan states that evidence to assess the reasonable prospect of workspace being used for business purposes in cases where redevelopment is proposed should evidence of vacancy and marketing (for at least 12 months at market rates suitable for the type, specification, use and size). Camden's policy approach expects 24 months of marketing evidence. it would be helpful if the wording of the Plan clarified that boroughs can seek evidence over a longer period where they consider it appropriate based on local circumstances.

In addition the Plan should specify that submitted evidence should demonstrate that premises have been marketed at the right prices/terms and through the right channels, related to the nature of the site and its locality.

User: Pat Turnbull

Policy E2 Low cost business space

A The provision, and where appropriate, protection of a range of low-cost B1 business space should be supported …**Remove 'where appropriate'. Who decides this?**

Accompanying text

6.2.2 Low-cost business space is often found in locations such as back-of town centre and high street locations, railway arches, heritage buildings in the CAZ, and smaller scale provision in industrial locations…**These locations should be included as to be protected in the Policy itself. They are exactly the types of low cost space that have already been substantially lost all over London.**

Policy E3 Affordable workspace

User:	Federation of Small Businesses
Should point 1 read?: ‘Where there is **‘no’** existing affordable workspace on-site’	

User:	Federation of Small Businesses
Borough Development Plans should support an Article 4 Direction where conversion from office to residential is being considered.	

User:	Federation of Small Businesses
Affordable workspaces must be permanently maintained as affordable.	

User:	Federation of Small Businesses
We support this measure.	

User:	Federation of Small Businesses
We support this measure.	

User:	London Healthier Places

A proportion of affordable (below market rate) business/retail space should be a requirement for all new commercial developments. This is particularly important for third sector organisations and or small and medium businesses and in the context of local regeneration processes.

New development should not result in loss of affordable space. Should this be inevitable, businesses should receive help with their re-location strategies.

User: SEGRO

Policy E3 Affordable Workspace - *In defined circumstances, planning obligations may be used to secure affordable workspace at rents maintained below the market rate for that space for a specific social, cultural or economic development purpose.*

A strategic policy directive for the provision of affordable workspace is neither effective nor appropriate. Policy should instead only be introduced and formulated at the local level, where the circumstances indicate it is necessary to meet identified economic/social objectives – e.g. in the CAZ fringe locations. We therefore strongly recommend that the requirement for industrial developers to comply with Draft Policy E3 is omitted from the London Plan, unless there is significant public intervention through the provision of land or a joint venture collaboration between the private and public sector.

User: SEGRO

Affordable workspace
Draft Policy E3 suggests that planning obligations may be used to secure affordable workspace at rents maintained below the market rate for that space for a specific social, cultural or economic development purpose. Such circumstances include workspace that is dedicated for charities or social enterprises; artists' and designer-makers; disadvantaged groups; or start-up businesses.

It also states that particular consideration should be given to the need for affordable workspace where there is existing affordable workspace on-site; in areas where cost pressures could lead to the loss of affordable workspace for micro, small and medium-sized enterprises (such as in the City Fringe around the CAZ and in Creative Enterprise Zones); and in locations where the provision of affordable workspace would be necessary or desirable to sustain a mix of business or cultural uses which contribute to the character of an area.

The Draft Policy encourages London Boroughs to consider more detailed affordable workspace policies in light of local evidence of need and viability, which may include policies on defining areas of need for certain kinds of affordable workspace.

The Draft Policy states that affordable workspace policies should be defined in Development Plans and Section 106 agreements, and should include ways of monitoring - including evidence that they will be managed by a workspace provider with a long-term commitment to maintaining the agreed or intended social, cultural or economic impact. It states that applicants are encouraged to engage with workspace providers at an early stage to ensure that the space is configured and managed efficiently.

We have serious concerns about the requirement to deliver affordable workspace, and therefore **object** to the inclusion of Draft Policy E3 within the London Plan.

Most of the types of businesses referenced above will generally not locate in industrial estates, and provision of such space to support these businesses would erode industrial capacity and functionality of existing/intensified industrial locations, which – as the London Plan identifies – are highly constrained in supply terms. For this reason, the application of Draft Policy E3 to industrial development is potentially harmful to the function and intensity of industrial capacity.

London Boroughs can (and do) prepare policies for affordable workspace in the absence of a strategic directive where there is an identified need for such space (for instance to address extensive and rapid gentrification), and where there are clear policy objectives for their introduction (for instance the need to maintain a specific and established business character which is key to an area's ongoing success and growth). Such Boroughs include Hackney and Islington. There are however far more locations within London where issues of extensive workspace gentrification are not present or not so acute as to need policy intervention. A strategic policy for affordable workspace is therefore not appropriate, as it is not necessary or relevant across much of London.

The provision of affordable workspace would significantly threaten the viability of development of certain types, and in certain locations. Whilst the proportion of workspace and level of discount is not set out in Draft Policy E3, given the acute viability constraints on industrial intensification and mixed-use industrial/residential development are already so great, it is highly likely that a requirement for affordable workspace within these schemes would further threaten their viability and delivery. This would therefore threaten a core objective of the plan to utilise industrial land and development more efficiently.

No market currently exists for affordable industrial workspace providers in the industrial sector, meaning such space would need to be managed by the landlord. This adds an additional financial burden which would ultimately impact on development being delivered. SEGRO does own and manage a small unit scheme on Slough Trading Estate, known as the Enterprise Quarter, which provides units from 500 sq. ft. on highly flexible terms. The units are not offered on a discounted rents but are in demand due to the flexibility of the lease, on site security and amenity, including a café and meeting space.

The only circumstances where SEGRO can feasibly deliver such development is where it is funded by the public sector. For example, SEGRO Park Rainham provides 44 enterprise units offering flexible industrial space to SMEs. The units range from 552sq ft. to 3,738 sq ft., and were delivered as part of SEGRO's partnership with the Greater London Authority. Occupiers will benefit from an easy in easy out lease arrangement and flexible unit but rents are not discounted. It would not have been possible to deliver such space without GLA support and this is likely to be the case across London, particularly where space is delivered in an intensified format.

A strategic policy directive for the provision of affordable workspace is neither effective nor appropriate. Policy should instead only be introduced and formulated at the local level, where the circumstances indicate it is necessary to meet identified economic/social objectives – e.g. in the CAZ fringe locations. We therefore strongly recommend that any industrial requirement to deliver affordable workspace in **Draft Policy E3 is omitted from the London Plan**.

User:	Notting Hill Housing Trust

NHHT supports the Mayor’s policy to ensure that affordable workspace is provided for SMEs in London. NHH would request that the requirement to place restrictions on the occupation of residential elements of a development is reconsidered. NHHT would emphasise that a restriction of this nature could create an unintended impact on local authority homeless waiting lists as well as to those shared ownership residents who are reliant on mortgages in principal. Commercial space end users often negotiate significant lead in times due to their bespoke fit out requirements. Retaining this flexible approach to commercial lettings will ensure the spaces are attractive to end users. NHHT would therefore support a policy that omitted this requirement

User: Chartered Institute of Architectural Technologists

Economy

Policies E1 to E11

We are in agreement with the proposals contained in the plan.

User: British Property Federation

While the concept of affordable workspace for a social, cultural, or economic development enterprise is laudable, the need for a London-wide policy on this is unclear as London boroughs already have the ability to ensure the delivery of affordable business space through planning obligations. Affordable workspace will usually be weighed against other competing priorities that a local authority wants to address via planning conditions and obligations. Often, other priorities such as social or affordable housing provisions and contributions towards infrastructure are preferred.

The implementation of this draft policy could also lead to unintended consequences. It could drive incumbent small businesses out of an area, as they struggle to compete with those enjoying preferential terms via the allocation of affordable workspace. One business's subsidised rent is another's unfair competition.

Subsidised units are likely to be assessed for business rates purposes based on rateable value rather than rent passing. This leads to a major unintended consequence as the total costs of occupancy (in the subsided workspace) will become significantly higher than finding cheaper workspace at market rent.

This draft policy may have a detrimental effect on the industries it is trying to protect, as many charities own their buildings, and to secure up-front lending they effectively take mortgages out on their buildings which are secured by future cash flows of annual donations. This draft policy, as worded, could reduce the value of these buildings and as such reduce the lending that the charities can secure to fund their activities.

We would also ask the Mayor to consider what implications the cumulative viability impact of having to deliver affordable housing and affordable workspace across London (such as in Camden, Westminster and parts of Islington) will have on development. There is no clear evidence provided to substantiate this policy and we have concerns regarding how it would be decided who benefits and for how long, nor is there any indication of how it will be managed.

Nevertheless, should the policy be retained, we would advise that it be amended as follows:

- 'Affordable' be defined more clearly. Currently, it is defined very differently across boroughs and this confusion could add to the viability concerns and therefore constrain office development.

- The application of this policy depends on local circumstances and the viability of the development concerned.
- The policy be revised to ensure that landlords have the power to include a maximum timeframe that a business can occupy a subsided space. Alternatively, the mayor could specify a maximum threshold after which a business is no longer eligible for the affordable space (to note- this would only work if there is a clear and uniform definition of affordable workspace). This will encourage all businesses to expand and grow, and not stifle their progress because of the enticement of cheaper rent.
- The mayor considers making retail units eligible for affordable workspace, the policy should not have discrepancies based on the operational nature of a business.

It should also be noted that this draft policy only provides a vague strategic framework, leaving it to local authorities to consider more detailed affordable workspace policies *'in light of local evidence of need and viability'*. The Mayor may have to provide further guidance on what 'local evidence' may mean in the context of affordable workspace, if the draft policy is to avoid the above and other as yet unknown unintended consequences.

We conclude that for this policy and the policy before (E2 Low cost business space), the market is already responding to providing for a range of office and other workspace requirements e.g. through the rise of co-working and serviced offices across London already in existence. The Ramadus report for the GLA on Small Offices and Mixed Use[i] concluded there was enough small office space available and at an affordable price to match the level of demand. Therefore, could we ask for clarification for why Policy E2 and E3 are needed in the new London Plan? Nevertheless, if the mayor persists with these policies, there should be an obligation to stipulate that they are permissive and designed to allow boroughs to develop their own local interpretation in local plans, and are therefore not to be applied directly in decision making without a local expression.

User: Business for London

Affordable workspace. E2 and E3 provide much needed support for the provision and protection of affordable workspace. Additionally E3 states that in mixed use schemes affordable workplaces should be operational before any residential elements are occupied. Achieving these policy objectives, while supported, will be extremely difficult to achieve in practice, due to the negative impact on the economics of commercial and residential developments. This will be especially difficult to achieve in more deprived areas, where such workspace is particularly valuable.

An effective and consistent definition of ‘affordable’ workspace is required. Different developers and different London Boroughs use varying definitions. In particular, the level of affordable rent should be set in the context of the rent levels being achieved in the immediate locality.

User: Crest Nicholson PLC

We consider this Policy to be unsound and unjustified as currently drafted and amendments are required.

Policy E3 Part C

We concur with the HBF's representation that Part C should be re-worded to allow the Boroughs through their Local Plans to decide whether it is appropriate to develop more detailed affordable workspace polices. The recommended re-drafted to Part C is set out below:

"Boroughs, in their ~~Development Plans~~ Local Plans, are encouraged to consider more detailed affordable workspace policies in the light of local evidence of need and viability and other material considerations such as the need to support housing delivery, including the need to improve the supply of affordable homes."

Policy E3 Part F

Care is needed when proposing such a policy as the current approach by many boroughs is overly prescriptive and restrictive as regards quantum of space and rent arrangements which can prevent affordable workspace being rented out to certain businesses who are seeking such workspace.

Part F of this policy is unnecessarily draconian and practically may not be possible in many developments. The wording requires the affordable workspace to be "operational" before occupation of residential elements of the development. Operational can be interpreted as follows which in each case causes the implications described below:

- implies the workspace is being used- this would require new tenants/occupiers for the workspace to be identified and working from the workspace which is unreasonable as the developer will have no control over when and if a suitable tenant will come forward. Instead, all that should be required is that the workspace is being marketed.
- implies the workspace is fully fitted out- it would be unreasonable for the workspace to be fitted out as many tenants will wish to undertake this type of work themselves depending on their desire to use the space. Indeed it would not encourage flexible workspaces to be created by developers to have the fit out tied to a particular style/layout.

Crest Nicholson consider this Part F should be deleted or at the very least the term “operational” should be replaced so that Part F reads as follows:

“The affordable workspace elements of a mixed use scheme should be marketing prior to residential elements being occupied.”

The policy itself does not need to set out specific timeframes for the affordable workspace to be constructed as regards linkage to the residential elements. Different development proposals may require different construction programmes; sometimes workspace will be located within the same building as residential elements but this is not always the case and the draft policy does not allow for different approaches to layout and construction so is overly restrictive. This is something that can be left to the relevant Boroughs to consider if it is suitable or necessary, so we do not consider there is a need for the policy or explanatory text to address such linkages and restrictions.

User: CBRE Global Investing

Policy E3 seeks to ensure that in defined circumstances, planning obligations may be used to secure affordable workspace at rents maintained below the market rate for a specific social, cultural or economic development purpose. Part B of this policy emphasises that particular consideration should be given to the need for affordable workspace in locations where there is existing affordable workspace, areas of cost pressures (such as the City Fringe and Creative Enterprise Zones) and in areas where affordable workspace is deemed necessary or desirable to sustain mixed business/cultural uses.

As set out above in the response to Policy E2, CBRE Global Investors consider there to be many locations where affordable workspace would not be necessary and/or viable. It is considered the requirement to provide affordable workspace will dis-incentivise landowners and developers from redeveloping sites, significantly impacting on future employment land supply within London, which is at odds with the achievement of Policy E1.

Viability is frequently a challenge to employment-led developments on both new and existing employment sites. Therefore, policy elements which further constrain the developer returns will impact deliverability of sites. In terms of mixed use sites, these types of developments already frequently face viability constraints through the provision of other planning obligations including affordable housing, and therefore any additional requirements relating to scheme viability will undoubtedly challenge the realisation of other policy aims within the London Plan.

Office Development

Many office developments across London, particularly those in areas of lower value, will be constrained by viability. London has a diverse range of office markets, as referenced at part D of Policy E1, and as such, price differentials and affordability is already factored in by the market-led approach to office development and subsequent leasing, i.e. affordable workspace is already provided by virtue of some markets and locations achieving lower rental values.

Furthermore, affordable workspace is not appropriate for many developments and locations i.e. occupier-led developments, head offices, campus office developments, or within key office agglomerations etc.

Management, security and lease structure issues will also make such a requirement unattractive to and unworkable for landlords, landowners and developers who favour strong covenants and security of tenure. CBRE Global Investors considers that this will have a detrimental impact on the future supply of B1 business space. An inability to provide flexible workspace should not compromise the redevelopment, refurbishment or expansion of employment development, to meet the significant demand outline in Policy E1.

Industrial/Warehousing Development

Industrial and warehousing floorspace would also currently be captured by this policy, which does not recognise the nature of these users and occupiers as needing industrial/warehousing space, which, by the nature of their operations requires single-occupancy units and service yard areas. These occupiers would not typically share units, and have bespoke servicing and operational requirements relevant to the development bespoke sites, and cannot facilitate the introduction of other types of workspace within new developments.

This is also likely to undermine the function of LSIS/SIL sites where relevant by virtue of compromising the attractiveness of new development to increase industrial or employment floorspace.

Policy Amendment Sought

With this in mind, CBRE Global Investors believe this policy should have stricter and more detailed guidance on the ‘defined circumstances’ under which it should be formulated at a local level, i.e. only where it is deemed necessary to meet identified, evidenced economic/social objectives which are reflected in site-specific viability approaches. The ‘local evidence’ referenced in the policy should also be further defined within the supporting text to ensure that if the policy is brought forward, the parameters are clear to both Boroughs and applicants.

Policy E3 Affordable workspace

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

B Particular consideration should be given to the need for affordable workspace for the purposes in part A above:
1) where there is existing affordable workspace on-site
2) in areas where cost pressures could lead to the loss of affordable workspace for micro, small and medium-sized enterprises (such as in the City Fringe around the CAZ and in Creative Enterprise Zones)
3) in locations where the provision of affordable workspace would be necessary or desirable to sustain a mix of business or cultural uses which contribute to the character of an area.
4) as part of development schemes where it is evidenced that it is viable to provide such workspace.

C Boroughs, in their Development Plans, are encouraged to consider more detailed affordable workspace policies in light of local evidence of need and viability. These may include policies on site-specific locations, or defining areas of need for certain kinds of affordable workspace.

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

E Leases or transfers of space to workspace providers should be at rates that allow providers to manage effective workspace with sub-market rents, meeting the objectives in part A, over the long term.

~~F The affordable workspace elements of a mixed-use scheme should be operational prior to residential elements being occupied.~~

User:	Benhill Residents
We are concerned that section A of the policy is too specific (fixed on what are defined by many boroughs as ‘clean’ rather than ‘dirty’ businesses. We propose that those involved in start-up businesses in, for example, trades, construction, mechanics, repairs, recycling and renewing should be included in section A and in the policy text, as should those that commit to employing and training local people.	

User: Royal London

Policy E3 - Affordable Workspace

RL in our asset management provide new and existing accommodation to support a range of businesses in type and size. Values for this accommodation are informed by the open market based on a number of factors including location/accessibility and quality/amenity of space. RL do no support the principle of an artificial reduction in the market value of office accommodation within the planning system as proposed under policy E3. A key part of a business becoming profitable and sustainable is identifying accommodation based on the above factors and is affordable to their means.

The provision of isolated units of affordable workspace within larger schemes does not align with examples of successful SME hubs and quarters suggesting a more strategic approach to provision is required to provision of such accommodation.

We would recommend that this policy is removed. Notwithstanding this if progressed there is a lack of clarity in the requirements of the policy and coordination with boroughs which will de-incentivise the development of sites. At the very least the provision of affordable workspace should certainly not be a requirement for all commercial development across the whole of London. If required, this should be on the very largest of schemes and there should be greater flexibility in how addressed including the option of a financial contribution toward starter business hubs on public sector land.

User: Elaine Chambers

Policy E3 Affordable workspace

We are concerned that section A of the policy is too specific (fixed on what are defined by many boroughs as ‘clean’ rather than ‘dirty’ businesses. We propose that those involved in start-up businesses in, for example, trades, construction, mechanics, repairs, recycling and renewing should be included in section A and in the policy text, as should those that commit to employing and training local people.

User:	Earls Court Public Sector Tenants' Assoc

We are concerned that section A of the policy is too specific (fixed on what are defined by many boroughs as ‘clean’ rather than ‘dirty’ businesses. We propose that those involved in start-up businesses in, for example, trades, construction, mechanics, repairs, recycling and renewing should be included in section A and in the policy text, as should those that commit to employing and training local people.

User:	Royal London

The DLP introduces a truly significant number of new and heightened requirements on development which will prevent and render a sizeable proportion of development proposals unviable. The DLP in this regard does not reflect current market conditions or provide a planning policy framework to enable and deliver the development and growth identified. Notable concerns include the prescriptive and inflexible requirements in relation to low cost business space and affordable workspace will be extremely harmful to commercial development and delivering the growth identified in the DLP. In addition, whist the provision of affordable housing and the principle of the threshold policy is supported the various levels set do not provide the conditions and reflect the viability position of development to facilitate delivery.

User:	Brixton Society

E2 & E3, Low-cost and Affordable Workspace: These policies are welcomed. However, each town centre or KIBA will need closer study of local needs and business potential. Developers have tended to provide generic business space as part of new developments, but which turns out to be unsuitable for the types of business seeking space in the area. This gives developers an excuse to seek residential conversion, so that business space disappears entirely from the site. Even willing developers need councils to provide more detailed guidance on local needs.

User: London Property Alliance

Draft Policy E3 addresses affordable workspace.

The Alliance does not consider that policy intervention in respect of affordable workspace is necessary or appropriate within core/established markets within the
CAZ. The diverse nature of the CAZ's multiple, varied, office markets make a "one size fits all" policy on affordable workspace inappropriate. The Alliance's strong preference is that the policy should be revised to be clear that it is not usually applicable within the CAZ. It is considered that the approach proposed is not consistent with the clear support set out for office growth and development within CAZ policies SD4 and SD5.

Without prejudice to this, if an enabling policy is to be retained and the CAZ retained within its scope, it should be clear that:

a) Boroughs are permitted, but not specifically "encouraged" to consider developing local affordable office accommodation;
b) Affordable office accommodation should be sought only where specifically required by local policy within an up-to-date Local Plan and not only on the basis of Policy E3; and
c) Such policies should only be introduced by the Boroughs within the CAZ where there is locally specific evidence that shows a need for policy intervention in order to address evidenced market failures.

This would ensure that such policies can only be introduced where there is a clear evidence base, tested through the Local Plan examination. Policy E3 should therefore be amended to specifically provide this further clarification, which should in particular provide appropriate flexibility for the CAZ area.

We set out, below, proposed revisions to Policy E3:

A. "~~In defined circumstances~~ Where there is clear, locally specific evidence that shows a need for policy intervention to secure the supply of affordable offices, and that intervention would be commercially viable throughout the office market cycle, Boroughs may introduce Local Plan policies on the use of planning obligations ~~may be used~~ to secure affordable workspace at rents maintained below the market rate for that space for a specific social, cultural or economic development purpose for an agreed time period. These may include policies on site-specific locations, or defining areas of need for certain kinds of affordable workspace, for varying periods depending on need. Such circumstances purposes may include workspace that is:

1. dedicated for specific sectors that have social value such as charities or social enterprises
2. dedicated for specific sectors that have cultural value such as artists' studios and designer-maker spaces
3. dedicated for disadvantaged groups starting up in any sector
4. providing educational outcomes through connections to schools, colleges or higher education
5. supporting start-up businesses ~~or regeneration~~.

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

1. where there is existing affordable workspace on-site
2. in areas where cost pressures could lead to the loss of affordable workspace for micro, small and medium-sized enterprises (such as around the CAZ and in Creative Enterprise Zones)
3. in locations where the provision of affordable workspace would be necessary or desirable to sustain a mix of business or cultural uses which contribute to the character of an area.

C. Such policies are unlikely to be necessary within the CAZ, because of the range and diversity of its office markets and its established protection from office-to-residential permitted development.

D. Affordable workspace should be sought only where required by detailed Local Plan policies.

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

F. Leases or transfers of space to workspace providers should be at rates that allow providers to manage effective workspace with sub-market rents, meeting the objectives in part A. This can be for a lease or license for a limited period.

~~G. The affordable workspace elements of a mixed-use scheme should be operational prior to residential elements being occupied.”~~

We set out, below, a detailed justification of this position.

Diversity of the CAZ office market. Within the CAZ (where an exception from permitted development rights to convert offices to homes has existed since 2013), there is little evidence of market failure. There is a wide range of employment typologies, with an associated breadth in terms of costs and rents. Accordingly large parts of the Square Mile and CAZ provide affordable accommodation to Micro, Small and Medium Enterprises ('MSMEs'). The City Core and other parts of the CAZ remain attractive to MSME businesses, because amongst other things, the protection of heritage stock provides a constant supply of affordable workspace.

Further, given the nature of the space in in some CAZ submarkets, such as the West End, floorplates tend to be smaller and as a result can offer more affordable rental opportunities within these sub-markets. Similarly secondary space in the Square Mile is typically discounted by £20 psf (at around £40 psf). It is evident therefore that the CAZ area is already naturally providing accommodation at circa 20-30% discount below headline rents. It is important therefore that the Mayor's approach to this policy is adequately flexible and accommodating for the CAZ area.

Unlike other parts of Inner and Outer London, rental levels in the CAZ core commercial areas have remained relatively stable. It is noteworthy, that in large parts of the Square Mile, rental values have changed little in 30 years (Ramidus, 2015, p.64). It is therefore considered that the policy should better recognise the special characteristics of the office market in the CAZ and its various office submarkets.

No affordable workspace policy is necessary within the CAZ, and particularly not in areas such as the Square Mile where rental levels largely reflects those of the late 1980s. The Alliance considers it is in those areas beyond the CAZ, (where evidence may demonstrate that there is a particular or specific requirement), where the Mayor should more appropriately direct and apply such a policy.

[GRAPH of City of London Prime Rent trend HERE]

In addition, West End prime rents have not risen significantly in the last 10 years, and are predicted to be stable, at least for the next period.

[GRAPH of West End Prime Rent trend HERE]

In addition, rental cost is often not the main driver for MSMEs locating in a particular submarket. Instead MSMEs place greater importance on quality of the design/fit-out, access to transport connections, access to customers, access for staff, future business growth, proximity to peers, and image of an area (public realm, mix of uses, leisure facilities (gym, evening economy)).

Cyclical Nature of the Office Market.

The draft policy should recognise the cyclical nature of the London office market (which is quite unlike the London housing market). The Central London office sector has historically been the most cyclical in the UK, reflecting the combination of yield shift and large swings in the rental cycle. Hence the need for local flexibility, to account for variations both locally and across market cycles.

Office supply is likely to be potentially vulnerable to an economic downturn post the UK leaving the EU, with a potential that rents will fall further from pre-Referendum levels. Draft policy E3 (and E1 and E2) should ensure that any policy is viable throughout the market cycle.

Physical constraints.

Office buildings in the CAZ are often designed as a headquarters building, where one company wishes to take all or the majority of the space in the building. In these circumstances, the provision of on-site affordable workspace would be incompatible with the special characteristics of the CAZ.

Accordingly the affordable workspace policy should not be applied where evidence can be provided that on-site affordable workspace would adversely affect the ability to market the building as a headquarters (or equivalent building). It is very likely that UBS (5 Broadgate), Deutsche Bank (21 Moorfields) or Facebook (Rathbone Place) would not have taken space in these large office buildings if circa 10% of the floorspace was earmarked for affordable workspace.

To maintain the special character of the CAZ, which has long included national and international headquarters of leading companies and institutions, such occupiers must be able to continue to find appropriate space. The Alliance is concerned that the inclusion of affordable workspace – as well as adding to costs – would make the CAZ's office supply less attractive to key potential investors, at a time when it is under particular pressure to remain competitive in the face of competition from other aspirant European financial centres.

Evidence base.

We have set out, above, our concerns about the cumulative effect of the requirements of the emerging Plan on development viability and the lack of clear evidence.

The new London Plan viability study (December 2017), envisages that affordable workspace comprising 10% of workspace should be offered at 80% of market rent. Whilst this has been tested in the viability appraisal and is purported to be viable amongst other CIL liabilities and S106 obligations, it is important that this level of affordable workspace is not adopted as the benchmark but rather local approaches are tested within Local Plans.

We do not agree with the statement in the viability assessment which states “the inclusion of affordable workspace makes little difference to viability in most cases”.

The viability study has not taken proper account of the office submarkets in the CAZ and the nuances that they generate. Even within the relatively small CAZ area, rents across the submarkets vary considerably, and therefore the provision of affordable workspace within these sub-markets can have a large impact on scheme viability.

Further, the viability study does not appear to take account of the cyclical nature of the office market (in addition to void and rent free periods, which are a particular feature of the commercial market). It is unclear if the viability study has undertaken appropriate sensitivity analysis, to account for likely office market cycles over the Plan period or considered the full range of potential effects of the proposed policy on development values, which will extend beyond simple reductions in headline rents but include higher build costs and higher investment yields (that is, a lower sale price) when sold. We note that rents in the Square Mile are now plateauing, if not dipping.

Appropriate lease terms will need to be negotiated for the affordable workspace and it is therefore likely that startups and some Micro, Small and Medium sized Enterprises (MSMEs) will offer a much less secure income stream, again affecting overall development value.

Compatibility with mixed use policies. The Alliance is concerned about the cumulative overall impact of delivering affordable workspace in mixed use schemes where local mixed use policies apply and policy already seeks housing and affordable housing. It is likely that affordable workspace will compete with other priorities such as affordable housing, transport and climate change for the same pot of money. Accordingly, it is important that the policy acknowledge the requirement for affordable workspace is always subject to scheme viability.

The Alliance are concerned that the draft policy may have unintended consequences, given the diverse nature of the office submarkets. It is important that the policy is applied flexibly, so that the policy does not depress office scheme values, such that office supply is curtailed i.e. a commercial scheme is not brought forward and commercial sites become less viable when compared to alternative use schemes.

Management.

Part D of the policy sets out that affordable workspace should be managed by a workspace provider, with a long-term commitment to maintain the agreed or intended social, cultural or economic impacts. The Alliance consider such a requirement is unduly prescriptive and any local policies should allow the affordable workspace to be managed by the developer/ property owner, should they choose, rather than requiring the involvement of a third party or registered workspace provider in the management role. This seems realistic given the relatively small proportion of floorspace being contemplated for affordable workspace. This might better integrate the space into the development.

Office Design.

The policy should acknowledge that design alone can create appropriate spaces within buildings that would either be deemed to be affordable and / or provide lower cost space.

Rental levels can vary considerably within an office building. Rents at the lower levels of a building or space which might include poorer aspect or orientation, attract lower rents than the upper levels. The rental difference between the best quality and the more inferior space e.g. lower ground, in the same building can vary by 50%. This illustrates that the market naturally provides a range of space at different price levels – even within the same building – often at a greater level of variation than that being considered within this policy without need for planning policy intervention.

Developers, owners and their design teams, without exception in the CAZ area, specifically design commercial buildings to be flexible to ensure maximum appeal to the market. Accordingly office buildings often have varying sized floor plates from ground to top floor (responding to the urban context), whilst floorplates are designed to enable sub-division to accommodate a range of potential occupiers, including MSMEs and co-working spaces. Policy could require developers to demonstrate that accommodation is capable of being subdivided to provide smaller units of occupation as smaller units of accommodation are inherently more affordable. The satisfaction of such a policy requirement should negate the need to specifically seek affordable workspace as a planning obligation.

Payment in Lieu.

In the event that a policy is retained, it is important that the policy also allows for financial contributions to provide affordable workspace off-site where on site provision is not possible. Where on-site provision is not practical or feasible, and the development meets the defined circumstances whereby affordable workspace is required, then financial contributions should be allowed. This situation arises where an office building is designed for a specific occupier and/or a major pre-let is secured at an early stage. Further it should be acknowledged that serviced office and co-working space providers can provide flexibility and competitive packages for MSMEs, which should negate the need for the provision of affordable workspace. In these circumstances a payment may be appropriate. This is an important factor when having regard to the planning obligations test set out at Reg. 122 of the CIL Regulations 2010 (as amended).

Further, an ‘affordable’ rent in a high value submarket may be considered affordable only because it is cheaper than similar spaces in the same area. However, it may still cost more than comparable spaces in low-value submarket let at market rent. In such circumstances a payment in lieu, to support provision elsewhere, at a much lower headline rent, may represent a better use of resources.

There is no justification for requiring that the affordable workspace element of a mixed use scheme be operational prior to the residential accommodation being occupied. This will not always be feasible and will cause phasing and cashflow issues.

User:	HB Reavis UK Limited

As for policy E2 above, we support the ambition of policy E3, but wish to ensure that it is applied in a manner which does not compromise commercial office space on prime office sites where that space will contribute towards London’s global competitiveness. This could include, for example, consideration of off-site solutions if a local demand for a certain type of affordable workspace is identified which is incompatible with open market commercial office space.

User:	Camden Town Conservation Area Advisory Committee
We welcome this policy.	

User: Vital OKR

Policy E3 regarding affordable workspace, should refer to a definition of workspace, and this should include all B class categories, not be restricted to B1. Section A point 2 should be widened to refer to specific sectors that have cultural value or niche economic significance, such as artists' studios, designer?maker spaces, specialist manufacture, repair and servicing, thus reducing the sectarian bias. Section A point 3 could usefully refer to groups starting up or continuing to trade in any sector, or doing activities that provide good access to employment and enterprise to disadvantaged groups. Section E could helpfully refer to workspace providers or to individual businesses / organisations, as specialist workspace providers are not always the best way forward and they can escalate cost.

Para 6.3.4 related to Policy E3 should include boroughs in its scope, stating that the Mayor will, and boroughs should, encourage the delivery of new workspace.

User: Bishopsgate Goods Yard Regeneration Limited

Boroughs already have the powers to deliver affordable business space through their Development Plans which can be secured by planning obligations. Affordable workspace will be weighed up against other competing priorities that a local authority wants to address via planning conditions and planning obligations. The requirement to provide affordable workspace could impact on scheme viability which may impact other priorities of the Borough, such as social or affordable housing provisions and contributions towards infrastructure.

The term ‘affordable’ should be given greater flexibility and clarification in the draft London Plan, as it can relate to rent, lease length and size of the accommodation provided.

Finally, the draft wording should not require the affordable workspace to be provided in perpetuity. This requirement is likely to significantly harm the viability of future schemes and place increased risk on the deliverability of developments in the borough. It is proposed that provision for a 5 – 10 year period would be wholly more appropriate.

User:	Here East

Whilst Here East supports the general principle of providing Affordable Workspace, it considers that the policies should not overly constrain the development of new commercial premises by requiring the protection of low-cost space, or requiring the provision of affordable workspace where it adversely affects the viability of development.

Here East considers that Policy E3 in its current draft form could result in unintended consequences for London’s economy, such as putting at risk the existing market led regeneration of London, and complexity in how it is delivered.

It also suggests that the policy should be subject to a minimum size threshold for practical purposes and an upper time limit for the duration of the planning obligation.

User: London Borough of Newham

Policy E3 Affordable Workspace

LBN are generally supportive of the policy which is complementary to Newham's Draft Revised Local Plan, particularly the promotion of the delivery of new workspace for creative industries, artists and the fashion industry. However, support should also be expressed affordable workspace for high technology manufacturing and digital industries. This is supported by LBN's own evidence which has seen increases in this demand in this sector.

In addition, Part F (affordable workspace occupied prior to residential occupation) is not necessarily universally appropriate given the need for cross-subsidy and viability constraints.

User:	Old Oak Park Limited

As noted above for policy E1, we do not consider that all sites, locations or buildings are necessarily appropriate for affordable workspace, and this type of accommodation should not be prioritized at the expense or compromise of other types of office accommodation.

User: Argent (Property Development) Services LLP

Draft Policy E3: Affordable Workspace

This policy gives wide latitude to local authorities to impose requirements for affordable workspace as part of proposals where existing workspace exists, in areas where there is pressure for low cost space and in other locations (part B). Part B should be revised to include an additional requirement for local authorities to consider the viability of introducing such polices alongside other demands on development, including CIL and particularly affordable housing policies.

User: One Housing Group

Draft policy E3: ’Affordable workspace’

Draft policy E3 gives wide latitude to local planning authorities to impose requirements for affordable workspace as part of proposals where existing workspace exists, in areas where there is pressure for low cost space and in other locations (part B). Part B should be revised to include an additional requirement for local authorities to consider the viability of introducing such polices alongside other demands on development, including CIL and particularly affordable housing policies.

User: Kesslers Stratford Limited

This policy gives wide latitude to local authorities to impose requirements for affordable workspace as part of proposals where existing workspace exists, in areas where there is pressure for low cost space and in other locations (part B). Part B should be revised to include an additional requirement for local authorities to consider the viability of introducing such polices alongside other demands on development, including CIL and particularly affordable housing policies (such as draft policy D6 which require up to 50% affordable housing in respect of LSIS).

Paragraph 173 of the NPPF requires local authorities to pay careful attention to viability and costs in plan making. However, the December 2017 London Plan Viability Study demonstrates that, with a 10% affordable workspace requirement, it is not viable to redevelop industrial or logistics sites in the medium and high benchmark land value £/ha scenarios. This underlines the critical need for policy objectives to enable viable and deliverable outcomes.

User: Dagenham Dock Limited

Draft Policy E3 – Affordable Workspace

Draft Policy E3 sets out the GLA's approach to affordable workspace in London. Para. 6.3.1 defines affordable workspaces as workspace that is provided at rents maintained below the market rate for that space for a specific social, cultural, or economic development purpose. It advises that it can be provided directly by a public, charitable or other supporting body; through grant and management arrangements; and / or secured permanently by planning or other agreements.

Clause A of Draft Policy E3 advises that in defined circumstances, planning obligations may be used to secure affordable workspace at rents maintained below the market rate for that space for a specific social, cultural or economic development purposes.

DDL is supportive of the Mayor's aspiration to establish more affordable workspace across London; and it can be considered within the Dagenham Dock site. However, compared to much of Greater London, workspace rates are already relatively low and further subsidisation against localised rates may not be practical or viable. DDL object to the requirement of Draft Policy E3, Clause F which requires *'affordable workspace elements of a mixed-use scheme to be operational prior to residential elements being occupied'*. It should be recognised that whilst best endeavours will be sought to ensure commercial spaces are operational prior to occupation, this is not always commercially feasible. At an absolute minimum, the Policy E3 should define *'operational'* within the context of Policy E3.

The provision of affordable workspace should also be a key consideration in the development of Financial Viability Appraisals which support development proposals, and specifically in the context of Policy H5 and H6. The London Plan should acknowledge that in some cases, the provision of affordable workspace may be more attractive to a borough, and more important in a particular development proposal (i.e. assisting with local demand and placemaking) than the provision of affordable housing.

User: Provewell Limited

This policy requires developments to provide affordable workspace in defined circumstances, at rents maintained below the market rate for that space for a specific social, cultural or economic development purpose. As detailed in Part A of the policy, such circumstances include workspace that is:
1. dedicated for specific sectors that have social value such as charities or social enterprises
2. dedicated for specific sectors that have cultural value such as artists' studios and designer-maker spaces
3. dedicated for disadvantaged groups starting up in any sector
4. providing educational outcomes through connections to schools, colleges or higher education

5. supporting start-up businesses or regeneration.

Provewell Ltd considers that warehouse living developments should be exempt from the requirements of this policy. The principle of warehouse living already meets the key objective of this policy – to provide affordable workspace for specific sectors that have social, cultural or economic value, as detailed in Part A of the policy. The mix of residential accommodation and workspace within warehouse living units offers affordable workspace as it allows occupants to use the single space for multiple purposes.

In addition, warehouse living units are particularly attractive to charities or social enterprises, the creative sector and start-up businesses which are often faced with affordability issues in renting workspace in addition to residential accommodation. Therefore, warehouse living units provide affordable workspace for sectors that have social and cultural value (Part A point 1 and 2), disadvantaged groups starting up in any sector (Part A point 3) whilst supporting startup businesses (Part A point 5).

As the fundamental characteristic of warehouse living units already provide affordable workspace, Provewell Ltd requests that warehouse living is excluded from this policy and that this exemption is clearly stated in the policy.

User: DTZ Investors

Whilst it is recognised that there should be scope for London Boroughs to introduce Local Plan policies, where there is a clear evidenced need to ensure this provision. It is recognised (at paragraph 2.4.1) that “The density, scale and mix of business functions and activities in the CAZ are unique” with the requirement under draft Policy SD4(B) that “The nationally and internationally significant office functions of the CAZ should be supported and enhanced by all stakeholders including the intensification and provision of sufficient space to meet demand for a range of types and sizes of occupier and rental values.”

The Central Activities Zone (CAZ) provides one third of London’s jobs and generates almost 10 per cent of the UK’s output and so it is essential that the London Plan ensures its strategic function is not compromised. Market forces have successfully created a mix of business types and sizes within the CAZ, with a range of large-scale and small premises with widely differing rents, suitable for large international corporations and SMEs and start-ups. In this context, it is a serious consideration that the imposition of a blanket policy on affordable workspace provision could compromise the strong and dynamic office market within the CAZ, where office space is at a premium.

Outside of the CAZ, it is considered that the requirement for affordable workspace to be managed by a dedicated “workspace provider” is unreasonable as site owners (and real estate investment managers such as DTZI on their behalf) are often best placed to manage letting of these areas - particularly when affordable floorspace within a scheme is limited. In addition to allowing freeholders to manage affordable workspace, it is considered that there should be the ability to secure affordable workspace off-site through delivery or payment in lieu of provision, in circumstances where site limitations and occupier requirements make it impractical and/or unviable for this to be delivered on-site.

Change Sought – In light of the above considerations, it is requested that Draft Policy E3 be amended to make it clear that affordable workspace should not be sought within the CAZ, with the policy also amended to allow freeholders (and long-leaseholders) to make their own arrangements to manage affordable workspace. The policy should also be amended to provide adequate scope for off-site provision of affordable workspace or a payment in lieu of provision where it is not practical or viable for this to be delivered on-site.

User:	London Borough of Ealing

The Council supports this policy but it would benefit from measures to encourage developers to liaise with workspace providers as early as possible in the planning process, with a view to having a named provider in the S106. This would help ensure space is designed with the end users requirements in mind.

User: Ballymore Group

This policy seeks in certain circumstances for planning obligations to be used to secure affordable workspace for SMEs, charities, artists and education uses at rents maintained below the market rate for that space. Part B lists occasions where such affordable workspace should be provided including where there is existing affordable workspace on-site or in areas where cost pressures could price SME tenants out of the market.

As mentioned above in relation to Policy E2, there are often occasions where outdated or poor quality floorspace on well-located but underperforming sites is let to tenants on a short-term basis at a nominal rent. The lack of clarity within the current wording of Policy E3 may therefore lead to instances where developers are being asked to fully re-provide the same level and type of existing floorspace at the current rental level. This would represent a major and unreasonable constraint to the delivery of the site and the viability of any redevelopment scheme.

It is on this basis that Ballymore would request that more consideration be given to the wording of Policy E3 so that it provides clear guidance to local authorities and developers on the physical and financial requirements for affordable workspace. This could include confirmation of what is considered to be a reasonable discount below market rental levels (and how long this rental level might need to be maintained) and what proportion of new business floorspace on the site should be subjected to these discounts.

User:	Chairs of Camden's Conservation Area Advisory Committees
E3 We welcome this policy.	

User: Aviva Investors

Policy E3 (Affordable Workspace)

Policy E3 Draft promoted the provision of affordable workspace for occupiers such as charities or social enterprises; artists' and designer-makers; disadvantaged groups; or start-up businesses.

The application of such a policy to industrial development would affect viability, which is particularly damaging to proposals for industrial intensification which are already challenging to deliver.

Aviva Investors objects to Policy E3 and recommends that it is removed from the London Plan, and that any requirements for affordable workspace are formulated at the local level where there is a clear need and policy objective for their inclusion, and where the viability impacts and other effects have been fully tested.

User: Dr Jessica Ferm

1. **Policy E3 on Affordable workspace** is also welcome and there are some good guidelines in there for boroughs. However:

1. the policy wording should be careful to remain clear about the *difference between affordable workspace and low-cost business space* (for example in B (1) it should refer to existing low-cost business space rather than affordable workspace).
2. There is no reference in the policy to the length of the leases, or *mechanisms for securing affordable workspace in perpetuity*, rather than just 5-10 years which is the norm.
3. It is unclear whether affordable workspace is *limited to B1 space or could include other B uses*. It would be good to be as broad as possible.

User:	Landsec

E2 Low Cost business space and E3 Affordable Workspace: we understand what the plan is trying to achieve in both areas, but agree strongly with the representations made by BPF, the Alliance and London First in this area. We believe the policies could have the unintended consequence of limiting the supply of land to deliver regeneration and new commercial floorspace.

User: Mr Gary Hayes

Policy E3 Affordable workspace

We are concerned that section A of the policy is too specific (fixed on what are defined by many boroughs as ‘clean’ rather than ‘dirty’ businesses. We propose that those involved in start-up businesses in, for example, trades, construction, mechanics, repairs, recycling and renewing should be included in section A and in the policy text, as should those that commit to employing and training local people.

User:	Sean Creighton

In their evidence submitted to the Croydon Local Plan consultation and examination CTUC/CA argued for the need for lower cost, affordable small workspaces at affordable rents. This need was also recognised by the Croydon Small Business Commission.

User:	Andrea Carey Fuller

We are concerned that section A of the policy is too specific (fixed on what are defined by many boroughs as ‘clean’ rather than ‘dirty’ businesses. We propose that those involved in start-up businesses in, for example, trades, construction, mechanics, repairs, recycling and renewing should be included in section A and in the policy text, as should those that commit to employing and training local people.

User: Lendlease

We support the ambition behind this policy and believe that it is important to ensure that start-up businesses and SME's can continue to find businesses space to operate from. However, we do not consider that a blanket approach to affordable workspace requirements is the appropriate strategy to achieve this. We consider that more targeted interventions, such as proposals elsewhere in the Plan for Creative Enterprise Zones, would be a more effective way of addressing this objective.

There is no established method of determining those in need of subsidised workspace and it is not clear how the policy would allocate such space. The allocation would have impacts on market competition by lowering overheads for firms successful in obtaining subsidised space giving a competitive advantage for firms which were not successful.

By adding to the overall burden of obligations the policy could also reduce development which in turn could impact upon the availability and costs of office space. For development which remained viable with this policy it would also reduce the viable level of other contributions, such as CIL or affordable housing within a large mixed-use development. The requirement in part F to ensure that workspace floorspace is completed and available before residential elements can be occupied unnecessarily negatively impacts upon development viability to the detriment of delivering new homes.

We support the ambition to ensure that business space continues to be available for all occupiers and believe the draft Plan has an important role to play in this. This policy as currently worded needs re-thinking as it is likely to fail to be effective in its ambition

User: Cross River Partnership

Policies E2 & E3 – we are supportive of efforts to provide affordable business space and extend this to retail - small floor plates and the benefits of retail diversity could be further highlighted.

Policy E3: Affordable workspace (p 230).
The draft should reflect the fact that flexible and affordable workspace is critical to supporting the start-up economy, and should be at the heart of ‘making the best use of land’.

A number of BIDs support or represent initiatives involving the use of ‘meanwhile space’ where land earmarked for development can be temporarily turned into a co-working environment.

We welcome Policy E3 setting out that the GLA will encourage Boroughs in their Development Plans to consider more detailed affordable workspace policies. However, further detail on how it will approach this would be helpful.

User: Workspace Providers Board

Defining purpose and beneficiaries (Policy E3 Part A)

The Draft London Plan states that planning obligations may be used to secure affordable workspace in circumstances where there is a social, cultural, or economic development purpose. The Plan but does not define precise parameters for how “social, cultural, or economic development is to be assessed”.

The Workspace Providers Board is ‘soft testing’ a London-wide voluntary accreditation scheme for affordable workspace providers offering community impact, with an outline criteria and scoring system. This could be useful in helping to define whether a workspace adds value and addresses market failures. It could also be used to monitor the extent to which providers are delivering on their social, cultural, or economic development commitments. We also note that a number of boroughs have procured OJEU compliant Framework Panels to ensure workspace providers meet a certain standard. We therefore recommend that the policy or supporting text makes reference to “Local Authority Framework Panels or London-wide Accreditation”.

Part A also lists a number of examples (1-5). We believe clarification is needed that spaces may carry out a number of these objectives and they are not mutually exclusive, or exhaustive. Particularly E3 Part A 3) may inadvertently drive the segregation of space for disadvantaged communities. Whilst we believe discreet provision is the better solution to meet some objectives, other spaces may benefit from a ‘blended’ approach which allows integration and inclusivity. The London Plan should say “Such circumstances include workspace that may include one or more of the following features” and remove “dedicated”.

In the supporting text it would also help to note that “Some workspaces cross-subsidise market rents or offer a range of rents to make some space available at very low rates for certain beneficiaries.”

We believe E3 A. 5) should refer to “early stage and start-up businesses and/or innovation”. This should be clearly defined as up to 3 years of trading.

Policy E3 A 3) should say “focused on regeneration and supporting disadvantaged groups starting up in any sector”

We also note that although the connection to schools, colleges, or higher education is often valuable, affordable workspace does not tend to "*provide* educational outcomes". The sense in paragraph 6.3.2 of "*helping to support*" is more accurate, and should be used in the policy E3 A 4). The inclusion of "innovation" in E3 A 5) would also include workspaces linked to the research and innovation in higher education institutions.

Geography of Affordable Workspace Policy (Policy E3 Part B)

Policy E3 Part B is clear that affordable workspace can be sought in particular places. We welcome the identification of the City Fringe and CAZ, where values are highest and provide significant affordability challenges for business, as suitable locations for local affordable workspace policy. We also support the designation of Creative Enterprise Zones and encourage the development of local policies in respect of workspace in these areas. We note LLDC's Hackney Wick/Fish Island SPD as an example of policies tailored to local circumstances.

We would also encourage the London Plan to provide additional wording that relates the implementation of policy E3 to other suitable areas – for example, non-CAZ locations where there have been significant net losses of low-cost business space; or where there are likely to be such losses as part of redevelopment in Opportunity Areas or Areas for Intensification. As well as other places that make a contribution to London's economic, social, educational or cultural profile.

We would also suggest that in part B 2) "for micro, small and medium-sized enterprises" is deleted, as the range of objectives of affordable workspace has already been made clear, and it is beyond simply all SMEs.

Local Authority application (Policy E3 Part C)

Local Authorities should be “encouraged to consider more detailed and robust affordable workspace policies”. Local Authorities should be encouraged to clearly state the objectives and purpose of different kinds of affordable workspace (for example those in part A) or their relative proportion in an area, because affordability (and rents) can vary between them, and developers may have a preference for providing higher value affordable spaces in areas where there is also a need for lower value affordable workspaces. The London Plan currently says they “may”.

The supporting text should note that “Boroughs are advised to draw on the experience of local workspace providers to understand the nature of demand in an area”.

Defining “affordability” (Policy E3 Parts A and E)

The draft London Plan currently defines affordable workspace as having “rents maintained below the market rent for that space” but does not say how much below. We feel this is somewhat open-ended. It would be simple to have a single number to define affordability. However in practical terms there can be some margin of error in market valuations, and they can be costly to independently verify. For example 80% or 90% of market rent may well be within the margin of error for a valuation.

We also recognise that a single figure may be an over-simplification, because affordability varies for different target beneficiaries, by sector and by age of establishment. Artists’ studios are typically around £14/sqft all in for end users, while the affordability of other forms of workspace can vary more by location as well as sector and age of business. It should be noted that many early stage businesses also value flexibility, and may pay more per sqft for space with flexible terms.

Therefore we believe the emphasis needs to be in including the operational costs of workspace providers into planning agreements which set the value of new affordable workspace. A planning obligation to provide workspace at a specified rate for end users, without setting a figure for what the workspace provider has to pay for the space, typically means the workspace provider is squeezed by the developer in negotiations resulting in the workspace provider being unable to achieve the social, cultural and economic development objectives.

Experience from members of the Workspace Providers Board suggests this ‘wholesale rental price’ figure is between £8-20sqft lower than the average end user figure. This can change depending on:

- the size of the space (where scales of efficiency can be achieved in larger spaces),
- the flexibility offered to end users (which requires more management), and
- other support programmes.

Policy E3 Part E appears to describe this, but could be clearer, supporting text should state: "Planning obligations should set the values that a workspace provider must pay the developer, rather than focusing on the cost to end users alone. This should avoid a squeeze on the delivery of objectives"

The supporting text should also outline cost ranges to give a sense of the likely figures, to aid boroughs and developers. The following figures are based on the experience of members of the WPB. The start-up spaces are intended as 'typical' approximations, drawn from a small number of examples, and as such may require further research.

Objective(s) of space	location	Typical 'wholesale rental price' for the workspace provider
Artist studios	Across London	£6.50/sqft
Social / start-up	Zone 3	£6.50/sqft
Creative / start-up	Zone 2	£15/sqft
Creative / start-up	Zone 1 / CAZ	£25/sqft

Supporting text should state "These values will usually be below the surrounding market average. For example, workspace providers typically need space at around £6.50/sqft for artists across London; £6.50/sqft for start-ups in zone 3; £15/sqft for start-ups in zone2; and £25/sqft for start-ups in zone1; in order to meet social, cultural and economic development objectives and offer flexible and affordable space for end users. "

Defining Long term (Policy E3 Parts D and E)

We support policies to secure longevity of affordable workspaces, as this allows initial investment to be recouped, while maintaining affordability. There should be a simple and easy to use definition of “long-term”. The supporting text should say: “Planning agreements should secure permanent or long term affordable workspace for example transferred with 125-year leases, or shorter term (15-year minimum) ‘hard’ leases with managed or index linked rent reviews, and the right to renew. These timescales allow workspace providers to spread their costs and make space available to beneficiaries at lower rates”.

To aid further clarity we proposed the sentence “Arrangements for engaging a provider, how the space will be owned or leased, arrangements for review, and changes in terms, disposal or termination, should be agreed in advance.” be added to Part E.

Design and management (Policy E3 Part D and Policy SD8 part C 2)

We note that mixed-use developments can include ground-floor non-residential spaces to make a nod towards existing planning policy, without being particularly well-considered. We support the general Policy SD8 Part C 2) which seeks to ensure that non-residential space is appropriately located, designed and marketed at realistic rents.

Design problems with affordable workspace might include the configuration of space as well as the wrong specification or absence of amenities. They might also arise from the over-specification of spaces by ambitious promoters supported by architects before a workspace provider is engaged.

We support Policy E3 Part D which encourages workspace providers are engaged at an early stage. The early engagement of workspace providers in the design and delivery of new affordable workspace is highly effective in bringing forward spaces with an appropriate specification for the target beneficiaries (users). However to ensure the effectiveness of the intent of this policy we believe workspace providers should also be “retained”.

Sequencing of workspace in mixed-use developments (Policy E3 Part F)

We are very supportive of Policy E3 Part F as it focuses attention on agreeing and finalising workspace arrangements in mixed-use schemes, which could otherwise be postponed indefinitely. However the world “operational” could be understood theoretically ‘with the potential to be operated’, instead we believe the wording should be changed to “in operation” or “should have agreed finalised terms”.

?**Summary of tracked changes to Policy E3**

Policy E3 Affordable workspace

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

1) ~~dedicated for~~ focused on specific sectors that have social value such as charities or social enterprises

2) ~~dedicated for~~ focused on specific sectors that have cultural value such as artists’ studios and designer-maker spaces

3) ~~dedicated for~~ focused on regeneration and supporting disadvantaged groups starting up in any sector

~~5~~ 4) supporting early stage and start-up businesses up to 3 years of trading ~~or regeneration~~ and/or innovation.

~~4~~ 5) ~~providing~~ helping to support educational outcomes through connections to schools, colleges or higher education

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

1) where there is existing affordable workspace on site

2) in areas where cost pressures could lead to the loss of affordable workspace ~~for micro, small and medium-sized enterprises~~ (such as in the City Fringe around the CAZ and in Creative Enterprise Zones) or other areas where there have been significant net losses of low-cost business space

3) in areas where there are likely to be such losses as through redevelopment in Opportunity Areas or Areas for Intensification.

4) in locations where the provision of affordable workspace would be necessary or desirable to sustain a mix of business or cultural uses which contribute to the character of an area or to London's economic, social, educational or cultural profile.

C Boroughs, in their Development Plans, are encouraged to consider more detailed and robust affordable workspace policies in light of local evidence of need and viability. These ~~may~~ should include policies on site-specific locations, or defining areas of need for certain kinds of affordable workspace. Boroughs are advised to draw on the experience of local workspace providers to understand the nature of demand in an area, and identify sites in masterplanning work.

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

E Leases or transfers of space to workspace providers should be at rates that allow providers to manage effective workspace with sub-market rents, meeting the objectives in part A, over the long term. Arrangements for engaging a provider, how the space will be owned or leased, arrangements for review, and changes in terms, disposal or termination, should be agreed in advance.

F The affordable workspace elements of a mixed -use scheme should ~~be operational~~ be in operation / have agreed finalised terms prior to residential elements being occupied.

6.3.1 Affordable workspace is defined here as workspace that is provided at **rents maintained below the market rate** for that space **for a specific social, cultural, or economic development purpose**. It can be provided directly by a public, charitable or other supporting body; through grant and management arrangements (for example through land trusts); and/or secured permanently by planning or other agreements.

6.3.2 Planning agreements should secure permanent or **long term** affordable workspace for example transferred with 125-year leases, or shorter term (15-year minimum) 'hard' leases with managed or index linked rent reviews, and the right to renew. These timescales allow workspace providers to spread their costs and make space available to beneficiaries at lower rates.

6.3.3 Planning obligations should set the values that a workspace provider must pay the developer, rather than focusing on the cost to end users alone. This should avoid a squeeze on the delivery of objectives.

6.3.4 These values will usually be below the surrounding market average. For example, workspace providers typically need space at around £6.50/sqft for artists across London; £6.50/sqft for start-ups in zone 3; £15/sqft for start-ups in zone2; and £25/sqft for start-ups in zone1; in order to meet social, cultural and economic development objectives and offer flexible and affordable space for end users.

6.3.5 Social, cultural, or economic development objectives can be set in planning obligations, or by ensuring workspace providers are on a Local Authority Framework Panel or have a London-wide Accreditation.

6.3.6 Affordable workspace may **help support educational outcomes**, for example by businesses providing apprenticeships and work experience, offering mentoring by entrepreneurs and/or providing space for further and higher education leavers to develop academic work into businesses. It may also be linked with business support and skills training.

6.3.7 As well as ensuring a sufficient supply of affordable business space, the Mayor also wishes to support sectors that have **cultural or social value** such as artists~~' studios~~, designer-makers ~~spaces~~ and charities or social enterprises for which low-cost space can be important. Therefore, in certain specific circumstances, as set out in part A, there may be a need to secure affordable workspace as part of new development.

6.3.8 The Mayor will encourage the delivery of new workspace for SMEs, the **creative industries, artists and the fashion industry** within new residential and mixed -use developments. He will also provide assistance to artists and creative businesses through the Mayor's Creative Enterprise

Zones (see Policy HC5 Supporting London's culture and creative industries) and promote schemes that provide linked affordable housing and business space in new housing developments.

User:	Oneill Homer
E3 Neighbourhood plans can also identify opportunities to deliver affordable workspace through their local knowledge of the local business scene and the drivers of competitive business locations and premises in their area.	

User: Camden Town Unlimited and Euston Town Business Improvement Districts

Part A of Policy E3 states that planning obligations may be used to secure affordable workspace in circumstances where there is a social, cultural, or economic development purpose but there is no indication how these characteristics will be assessed. Moreover it is important to be aware that spaces may carry out a number of these objectives and they are not mutually exclusive, or exhaustive.

In order to help identify if the criteria of policy E3 part A is met we would suggest utilising an accreditation scheme for affordable workspace providers offering community impact, with an outline criteria and scoring system. This could be useful in helping to define whether a workspace adds value and addresses market failures. It could also be used to monitor the extent to which providers are delivering on their social, cultural, or economic development commitments.

Policy E3 Part B is clear that affordable workspace can be sought in particular places. We welcome the identification of the City Fringe and CAZ, where values are highest and provide significant affordability challenges for business, as suitable locations for local affordable workspace policy. We also support the designation of Creative Enterprise Zones and encourage the development of local policies in respect of workspace in these areas.

We support the intention of Policy E3 Part C – that Councils should be “encouraged to consider more detailed affordable workspace policies”. However, more thought should go into how Councils can clearly set the objectives and purpose of different kinds of affordable workspace.

This is because affordability (and rents) can vary between them, and developers may have a preference for providing higher value affordable spaces in areas where there is also a need for lower value affordable workspaces. The London Plan currently says they “may”.

User: Unknown

While the concept of affordable workspace for a social, cultural, or economic development purpose is laudable, the need for a London-wide policy on this is unclear as London boroughs already have powers to deliver affordable business space through planning obligations. Affordable workspace will be weighed up against other competing priorities that a local authority wants to address via planning conditions and planning obligations. Often other priorities such as social or affordable housing provisions and contributions towards infrastructure are preferred.

The implementation of this draft policy could also lead to some unintended consequences. It could drive incumbent small businesses out of an area, as they struggle to compete with those enjoying preferential terms with regards to the allocation of affordable workspace. Moreover, subsidised units are likely to be assessed for business rates purposes based on rateable value rather than rent passing. This could make the total costs of occupancy (in the subsided workspace) significantly higher than if the business occupying the property were to find cheaper workspace at market rent. This draft policy may also have a detrimental effect on the industries it is trying to protect, as many charities own their buildings, and to secure up-front lending they effectively take mortgages out on their buildings which are secured by future cash flows of annual donations. This draft policy, as worded, could reduce the value of these buildings and as such harm the lending that the charities can secure to fund their activities.

Our client would also ask the Mayor to consider what implications the cumulative viability impact of having to deliver affordable housing and affordable workspace will have on development. They would like more information about affordability in the context of workspace; i.e. who benefits, for how long, how it will be managed.
Our client would also request that ‘affordable’ be defined more clearly. It is defined very differently across boroughs and this confusion could add to the viability concerns and therefore constrain office development, when office space in London is needed.

It should also be noted that this draft policy only provides a vague strategic framework, leaving it to local authorities to consider more detailed affordable workspace policies ‘in light of local evidence of need and viability’. The Mayor may have to provide further guidance on what ‘local evidence’ may mean in the context of affordable workspace if the draft policy is to avoid the above and other unintended consequences.

Our client concludes that for this policy and the policy before (E2 Low cost business space), the market is responding to providing for a range of office requirements through the rise of co-working and serviced offices across London already. The Ramadus report for the GLA on Small Offices and Mixed Usei concluded there was enough small office space available and at an affordable price to match the level of demand. Therefore, they seek clarification for why Policy E2 and E3 are needed in the new London Plan.

User: L&Q

Providing lowcost space, affordable business space and smaller industrial space

The draft London Plan is vague. Applicants should ‘consider’ providing low cost space, ‘may’ seek affordable workspace and should ‘consider’ the scope to provide smaller (sub-2,500 sq m) industrial space. No clear detail is provided on appropriate ratios for the above and with low-cost or affordable space on rents to be charged. This will not help good decision-making.

If the draft London Plan is to address these matters then its policies must either provide clear guidance or explicitly leave this matter to be addressed by Boroughs individually.

User: dp9

Policy E3 – Affordable workspace

As noted above for policy E1, we do not consider that all sites, locations or buildings are necessarily appropriate for affordable workspace, and this type of accommodation should not be prioritized at the expense or compromise of other types of office accommodation – especially in large-scale Grade A office buildings. We consequently support a criteria-based approach as set out in this policy. We have worked collaboratively with LB Wandsworth Council to deliver a range of workspace typologies at Battersea Power Station, including subsidized incubator floorspace where there was no policy requirement to do so, and believe that in the right locations it can contribute positively to commercial development and the economy. However, this is not always the case, and Boroughs should not apply blanket policies which seek this type of accommodation in all commercial office developments.

User: Taylor Wimpey UK

Policy E3 Affordable workspace

Whilst we recognise that workspace should be available to provide jobs for residents of mixed-use schemes, this does not require all of the workspace to be operational day one. It should be possible to phase this development to meet local need. Providing such workspace on day one may not be compatible with the master planning or phasing of a development site. Consideration must also be given to the phasing of schemes to ensure their viability is not threatened.

User: Workspace Group

Policy E3: Affordable Workspace

We do not consider there is planning justification for a policy requiring that affordable workspace is provided as part of development proposals. This is something that can and is being addressed by the market through catering for the needs of SMEs. It should not be a requirement of planning policy. Workspace Group provides a form of affordable accommodation in that it provides a range of units that can cater for growing businesses and on flexible terms that suit start up and smaller businesses in response to market needs.

The definition of affordable workspace is also queried, this being *"…workspace that is provided at rents, maintained below the market rate, for that space for a specific social, cultural, or economic development purpose".*

There is no evidential or land use policy basis to give London-wide discounted rents to specific sectors of the business floorspace market and the definition provided is wide ranging and could incorporate many B1 users. The policy is likely to have unintended consequences, making development less viable, and there is no mechanism to identify which businesses (and for how long) should benefit through subsidy by other businesses paying market rents. The latter will in fact need to increase in order to subsidise sub-market space.

Encouraging residential and mixed-use developments within London to provide affordable workspace accommodation will discourage investment into London and encourage prospective developers to go elsewhere; it will also discourage existing building owners from investing in improving and expanding their properties. This will have adverse impacts on London's office and workspace market and, in fact, curtail supply. This will have the opposite effect to the intention of the policy.

It is therefore considered that Policy E3 should be deleted. In its place the London Plan should instead promote and encourage the delivery of new and improved workspaces for SMEs generally and not seek to intervene in the natural cycle of the property market for business space where costs and affordability ebb and flow, as some areas regenerate and others fall into relative decline.

User: Kingston First

In addition to its role as a major retail centre, Kingston Town Centre also provides a large number of office jobs.

Figure A1.4 of the draft Plan identifies Kingston Town Centre as an area where office guideline 'B' should apply. This states that there is 'mixed-use potential' where there is capacity, demand and viability to accommodate new office development' generally as part of mixed -use developments including residential use.

Historically offtce floorspace has been provided through a range of office sizes, both within converted and purpose-built facilities. In recent years the introduction of permitted development rights, enabling a change of use from office to residential use, has affected the amount of office floorspace available within the town centre. The centre is now subject to an Article 4 direction which prevents this change of use taking place without planning permission, however the changes of use which did take place have affected the balance of existing 'mixed-use' developments and may also have affected the amount of smaller and more affordable workspace available to businesses.

Kingston First therefore supports the wording of draft Policy E1 and the need to plan for new mixed-use developments. Any larger office developments should show flexibility in adapting to future tenants, of various sizes, and ensuring that they are fit for purpose. Retail a d other commercial units should be the focus for ground floor units to ensure that there the streetscape remains active and vibrant, and to ensure that the provision of office floorspace does not jeopardise the retail or commercial function of the centre. Kingston First supports the provision of new low-cost and affordable office space set out within draft Policies E2 and E3.

User: London and Continental Railways

We also consider a similar approach should be applied to draft Policy E2 (low-cost business space). This policy seeks to secure the provision, and where appropriate protection, of low-cost B1 business space to support SMEs, with proposals which result in the loss of B1 floorspace in areas where there is an identified shortage of lower-cost space:

1 demonstrating that there is no reasonable prospect of the site being used for business purposes, or

2 ensuring that an equivalent amount of B1 space is re-provided in the proposal, incorporating existing businesses where possible, or

3 demonstrating that suitable alternative accommodation is available in reasonable proximity to the development proposal and, where existing businesses are affected, that they supported in their relocation.

We do not consider this ‘blanket’ policy approach should be applied, as it could restrict any future development to the re-provision of space of a similar type/character. This policy should be amended to exclude existing temporary/meanwhile uses, ensuring these would not limit the potential for the delivery of different uses on a site as part of a permanent redevelopment scheme. This same amended approach should be taken to draft Policy E3 (affordable workspace).

User:	London Borough of Camden

This policy is supported. However, the requirement for the affordable workspace elements of a mixed-use scheme to be operational prior to residential elements being occupied may delay delivery of housing.

The policy should be more explicit as to what rental levels and lease arrangements constitute affordable space. Without this it will be difficult for Boroughs to secure and effectively monitor the provision of this affordable space on an ongoing basis.

User:	Battersea Project Land Company Limited

Policy E3 – Affordable workspace
As noted above for policy E1, we do not consider that all sites, locations or buildings are necessarily appropriate for affordable workspace, and this type of accommodation should not be prioritized at the expense or compromise of other types of office accommodation – especially in large-scale Grade A office buildings. We consequently support a criteria-based approach as set out in this policy. We have worked collaboratively with LB Wandsworth Council to deliver a range of workspace typologies at Battersea Power Station, including subsidized incubator floorspace where there was no policy requirement to do so, and believe that in the right locations it can contribute positively to commercial development and the economy. However, this is not always the case, and Boroughs should not apply blanket policies which seek this type of accommodation in all commercial office developments.

User:	Age UK London - a charity working with older Londoners

POLICY E3: AFFORDABLE WORKSPACE

PROPOSED POLICY AMENDMENT:
ADD age and disability friendly requirements to this policy.

User:	Age UK London - a charity working with older Londoners

48. E3 LINK TO POLICY CHANGE We consider affordable workspace to be of significance to older people. To begin with, older people require support from voluntary agencies and it is likely that this need will increase so, especially in an environment of increasing market rates, it is crucial that rental costs for charities and voluntary organisations are reduced as their presence and continued existence will directly impact positively on the quality of life for older people. Secondly, given the scenario described in GG1 points 1-6 above, it is also likely that newly retired people will begin to diversify into new self-employed roles and therefore, the availability of low cost work space will be an advantage for them. And finally, given the scenario described in notes GG1 1- 6 all work spaces should now be designed to be disability and age friendly.

User: Pat Turnbull

Policy E3 Affordable workspace

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

1) dedicated for specific sectors that have social value such as charities or social enterprises

2) dedicated for specific sectors that have cultural value such as artists' studios and designer-maker spaces

3) dedicated for disadvantaged groups starting up in any sector

4) providing educational outcomes through connections to schools, colleges or higher education

5) supporting start-up businesses or regeneration…

This is a very restricted selection. Why not people or small businesses serving the needs of the local community? It seems to set a value system on what is useful that may not correspond with the fundamental needs for jobs or services of London's people.

User: Balfour Beatty

Commercial workspace Policy E3 - Affordable workspace: Balfour Beatty supports the provision of workspace for SMEs, start-up businesses, and the creative and cultural sectors. However, proposed Policy E3 could result in significant unintended consequences for London's economy. An affordable workspace policy could prevent the delivery of development. The introduction of a subsidised workspace policy will have an impact on the viability of commercial development causing a market distortion. By adding another layer of cost, it has the potential to reinforce the existing problem of market cycles. If the cost of development rises too high relative to value or the potential value decreases relative to cost, then attraction of undertaking speculative development is reduced. London Plan Viability Study (December 2017), at Paragraph 16, states that 'the inclusion of affordable workspace makes little difference to viability in most cases'. This statement is not inaccurate. The GLA's viability appraisal has only tested the provision of 10% of the floorspace at 80% of the market rent and has not reflected the costs of providing separate self-contained offices which will be under separate occupation and most likely management. This policy could potentially reduce the overall supply pipeline and therefore place rents under upward pressure, reversing the very objective that the policy set put to achieve. Many developers are already delivering affordable workspace voluntarily, through flexibility in lease terms, rather than subsidised rent and recognising the social and economic benefits of doing so. Therefore, this policy should be deleted.

User:	Workspace Providers Board

We note that draft policy E3 is not a blanket policy, and that it sets out a framework with a number of qualifying points. These need clear and firm definitions, without which local pressures may result in the inconsistent application of strategic principles.

User:	Primrose Hill Conservation Area Advisory Committee
E3 We welcome this policy.	

User:	Regent's Park Conservation Areas Advisory Committees
E3 We welcome this policy.	

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

User: TUC London, South East and East of England

Policy E4: Land for industry

1. Land should be retained for waste management, but also for comprehensive recycling services, green manufacture and energy generation from waste.
2. An example of the protection of utilities infrastructure is the case of Royal Mail and the piecemeal closure of sorting offices. The sorting office at Rathbone Place, off Oxford Street, was recently sold for housing development. The sorting office at Mount Pleasant has been partly re-developed for housing. It is expected that the sorting office at Vauxhall will be under acute pressure. More and more sorting is done at outer London offices increasing the journey miles on London’s roads by mail lorries. And local sorting offices are closed, meaning that typically, postal workers drive to a location to begin their rounds, where they one walked, increasing journey miles, congestion, pollution and making their jobs more stressful and more sedentary.

User: Federation of Small Businesses

It is vital that sufficient, appropriately located and designed land for logistics and freight operations is made available across London. Whilst the intention to move to sustainable transport functions is understood, the delivery of this policy should not be undertaken until sufficient relevant infrastructure is in place. If there are shortfalls the result could be shortages or increased costs for supplying and servicing London.

We have already seen significant cost pressures for small businesses from logistics and freight operators who are struggling to locate their operations in appropriate places in and around London.

9) We welcome the proposal to ensure sufficient availability of low-cost industrial and related space for micro and small businesses. Finding appropriate, affordable space is a continuous challenge for small and micro businesses, whether they are at the start up stage, wishing to grow their business or long-established businesses at the heart of their local community.

User: Federation of Small Businesses

Whilst the intention is for there to be no net loss of industrial floorspace capacity, we feel this is unambitious and could stifle economic growth across the capital. There has been over three times more industrial land lost than set down in the London-wide benchmark in the previous London Plan and around eight times more in central London Boroughs.

There should be plans to increase availability of industrial land to ensure the capital can continue to be supplied and serviced throughout the term of this new London Plan.

A lot of space will be under the threshold and will be down to Boroughs to monitor – we feel it is going to be difficult for the GLA to measure ‘no net loss of space by 2041’

Bolder solutions are needed to identify new industrial sites within Opportunity Areas and in and around town centres or other areas identified by the boroughs.

Policy E7 refers to non-designated industrial sites; we would like to know how the no net loss principle will be applied to these sites as this is where a large number of micro and small businesses are based.

User:	Federation of Small Businesses
It is vital that the infrastructure to support industrial operations is up to date, appropriate and in place for existing and new operators.	

User:	Federation of Small Businesses

Access to wholesale markets should not be restricted to certain hours of the day. Small and micro businesses should be able to reach them at times that suit their business operations.

User:	Federation of Small Businesses
We fully support this measure.	

User:	Federation of Small Businesses
It is vital that smaller industrial units are included and maintained in new developments, and that leases are priced proportionately.	

User: Kingfisher PLC

Home Improvement stores should be protected in the same way as land for industry, logistics and services [Policy E4; E5]

Kingfisher agrees with the intention to secure sufficient supply of land and premises to meet current and future demands for industrial and related functions to be maintained. Indeed, a significant proportion of our Screwfix trade counters in London (typically B8 sites, serving predominantly trade customers within industrial estates and some Strategic Industrial Locations), fall into this category.

Since 2012, Screwfix has opened 50 new stores across the UK every year, with expansion also included within the capital with an increasing number of outlets located in more central locations (e.g. Fulham and Kensington).

Screwfix also contributes to the Mayor's aspiration to address the Construction Skills Gap in its support for trade apprentices; it is running its Top Trade Apprentice competition for the third consecutive year to support the pipeline in the trade and published a guide in 2016 to encourage trade customers to hire their own apprentices.

Kingfisher supports the draft Plan's inclusion to encourage boroughs to define the detailed boundary of Strategic Industrial Locations in policies maps as it is sometimes difficult to identify whether or not our Screwfix sites fall within or outside of the SIL boundary.

However, it is becoming increasingly difficult for Screwfix to find new B8 sites in London and have opened A1 sites in some locations – which typically have higher rental rates than B8 sites, which makes it more difficult to maximise financial viability.

While it is encouraging to see that businesses serving an industrial purpose are being protected in the Plan, we believe that the approach to out of town retailing is contrary to this approach. **We believe that retailers contributing to these same aims as industrial sites and contributing to other planning priorities such as housing should receive similar protections to industrial sites.**

We believe our B&Q stores have much in common with industrial sites identified for protection. Not only do they directly serve a significant number of trade professionals (who represent around 25% of B&Q's customer base through its 'Trade Point' provision), they also contribute directly to the Mayor's priorities to maintain and repair existing housing infrastructure as well as creating more homes in the capital to serve the needs of London's growing population.

Like industrial sites, B&Q stores also contribute towards employment opportunities for Londoners with more than 1,000 store colleagues within the capital.

We very much hope that you will take these comments into consideration, and make modifications to the policies in the draft London Plan. Please do not hesitate to contact us should you wish to discuss the matters further with us in more detail.

User: SEGRO

1. We welcome the new London Plan’s acknowledgement that the provision of industrial space is of critical importance to servicing London’s existing and growing residential and business communities.

2. We support policies to prevent the loss of industrial space, however the draft policies raise concerns that this approach does not come close to addressing the 605ha+ of industrial land which is already being released over and above the latest demand forecast. To address the widening gap between demand and supply, we recommend that new industrial capacity is planned for and delivered through:
? New Opportunity Area Planning Frameworks (OAPFs)
? A review of the Green Belt

3. We are concerned about the planning policies for commercial development which do not differentiate between office and industrial uses - which have significantly different development requirements/constraints and occupier needs. The proposed requirements for flexible/affordable workspace and urban greening are examples of where this ‘one size fits all’ approach will make industrial development hugely challenging and potentially unviable and undeliverable.

4. We do not believe that the London Plan is sufficiently informed by the operational needs of modern industrial occupiers. The service yard of an industrial scheme is a critical part of an industrial occupier’s operation, and the notion of achieving intensification through increasing plot densities, and/or re-providing industrial development at 65% plot ratio is at odds with occupier requirements, where the trend is towards reducing plot densities to circa 45%.

User: SEGRO

Given the hugely excessive supply of industrial land and capacity which has been released to alternative forms of development in recent years, SEGRO strongly supports the principle of no net loss of industrial capacity which is rigidly monitored and applied, unless it is ‘Plan led’.

However, SEGRO believes that the London Plan should go beyond just maintaining existing levels of industrial capacity, and should instead promote the development of additional industrial development to meet projected industrial needs. As we have set out in the introduction, industrial needs will continue to grow in response to a structural shift in the logistics sector, together with significant growth in London’s population and economy. This is evidenced by the outputs of the GLA’s demand studies, which indicate that at least 605ha industrial land is being released over and above the identified need.

User: SEGRO

New Industrial Land/Capacity
The Draft London Plan evidence base (the London Industrial Land Demand Final Report 2017) indicates that there will be positive net demand for industrial land in London over the period 2016 to 2041, which will largely be driven by strong demand for logistics in order to service the growth in London's economy and population. The evidence base states that for the period 2016-41, a total of 233 ha of industrial land can be released. However, the evidence base also identifies that at least 185 ha of this already has planning permission to change to non-industrial use, and at least 653 ha is earmarked for potential release in Opportunity Area Planning Frameworks, Local Plans and Housing Zones. These planned release figures were identified in 2015, and so have almost certainly increased even further, meaning that overall, at least **605ha** industrial land (but most likely much more) has been released over and above what the latest demand forecast indicates is needed for the period 2016-41.

In light of the projected release figures, we believe that the London Plan should be planning for more industrial capacity to meet London's projected industrial needs (enough to represent at least 605ha new industrial land based on the latest evidence base), rather than just taking a 'no net loss' approach as currently proposed.

We acknowledge that delivering new capacity will not be easy given the competing interests for land in London. However, it considers that the following sources of capacity could and should be utilised:

Industrial Intensification
As set out previously, a number of intensification measures could have the opposite effect of helping to provide the right space in the right locations to support London's growth. In the right conditions, multi-storey schemes can help to provide significant industrial floorspace but will not provide the 'silver bullet' for addressing London's industrial capacity issues. However, it can provide a source of additional supply if the Mayor and London Boroughs take an active role in land assembly in locations where demands are highest such as Park Royal and locations close to and within the North Circular, and if the recommendations set out in Sections 1 and 3 are incorporated in the adopted London Plan. Without such measures, delivery will be more constrained by policy requirements than it is currently, and the minimal level of intensification activity which has occurred in recent years will be reduced further.

Mixed Use on Existing Non-Designated Industrial Sites

If the recommendations set out in Sections 2 and 3 above are incorporated in the adopted London Plan, this form of development is likely to be deliverable in some locations. Whilst it is unlikely to deliver additional industrial capacity, it will limit further loss of industrial capacity and could provide businesses with more modern premises suited to meeting last mile needs.

Opportunity Areas

Opportunity Areas are intended to accommodate a significant amount of London's population and business growth in the years ahead. With this growth comes additional need for industrial and logistics space to serve these new residential and business populations. As we set out in our representations to the Draft Transport Strategy, the ability of the urban logistics sector to operate efficiently is dependent on the availability of industrial space and land in and around consumer markets. Therefore, a significant constraint on being able to improve freight and parcel delivery efficiency is the availability of industrial sites in urban locations. On this basis, we believe that the Mayor's 'good growth' principles should include ensuring Opportunity Areas provide suitable sites for industrial facilities in urban locations to support last mile services.

Recommendation 3 of the Keep London Working report states:
"Strategic Industrial Locations across Opportunity Areas should be reviewed. Where these are retained they should be afforded strong policy protection. Opportunities for new designations should be considered. These should be in locations which are fit for purpose and reflect the most meaningful locations for urban logistics operators and industrial occupiers, taking into account the locational requirements of the sector. Proximity to housing development should not be a negating factor; mixed-use schemes are demonstrating that combined land use solutions are possible. The GLA could also consider designation of new Industrial Opportunity Areas in appropriate locations, either in their own right or as part of wider existing Opportunity Areas. The first such classification could be Park Royal, given its existing prominence as an industrial area and its location within the Old Oak Park Royal Opportunity Area."

In this context, we recommend that industrial needs are calculated and planned for in the same way as social and transport infrastructure at the planning stage for new growth areas. Such a methodology should be developed by the Mayor to inform the preparation of Opportunity Area Planning Frameworks (OAPFs), so that each new community is appropriately served by sufficient industrial/logistics space, perhaps in the form of new LSIS, which in most instances will be best suited to last mile facilities.

Such facilities do not necessarily need to come at a cost to/in place of other uses, as they should be able to co-locate with other forms of development if designed appropriately (assuming that the viability recommendations made in Section 3 are implemented).

Central Activities Zone (CAZ) [See comments on SD4]

Green Belt and Metropolitan Open Land [See comments on G1 and G2]

User: SEGRO

Spatial Approach to Industrial Capacity
In coordinating the provision of new industrial space in Opportunity Areas, the CAZ and the Green Belt, it is important that a spatial approach is taken to ensure that new capacity is developed in the most sustainable and effective locations.

In our representations to the Draft Transport Strategy, we highlighted the strength and importance of the inter-relationship between urban logistics, the transport strategy and the location/availability of industrial land. We also urged the Mayor to review its planning and transport policies holistically, with a focus on ensuring industrial land is planned for and delivered in the right locations, noting that such an approach would provide the most effective means of achieving the overarching objectives of the Draft Transport Strategy in relation to minimising freight movement and encouraging 'good growth'.

In addition, Recommendation 5 of the Keep London Working report states that:
"In allocating industrial locations, it is not appropriate to simply designate locations outside of London. This will create challenges for urban logistics companies due to their reliance on proximity to their customer market. They will be less efficiently able to respond to the demands placed on their services. Further to this, many local authorities neighbouring London are already in challenging situations trying to identify sufficient land for their own employment and housing needs. In identifying new locations for industrial land, the following must be considered:
? Locations of population growth
? Locations of business growth
? The locational requirements of urban logistics companies including distance to market and access to good transport routes
? The site specification requirements of urban logistics companies
? The demands for employment and housing land from within local authorities neighbouring London".

We recommend that further evidence is obtained by the Mayor to establish the most effective locations for new industrial development. These are likely to be driven by the established and emerging supply chains which operate to support London; the transport movements that result from this process; and the ability of roads and transport networks to operate effectively to accommodate these movements. Such evidence will contribute to the 'good growth' principles proposed in both the Draft London Plan and the Draft Transport Strategy. We are happy to engage with and support the Mayor in undertaking this critical work.

User: SEGRO

Part D of Draft Policy E4 sets out the optimum conditions for retaining and providing industrial development. We support this part of the policy, particularly regarding the provision of industrial development in locations accessible to the strategic road network and the creation of ‘last mile’ distribution services to support large-scale residential or mixed-use developments.

Part E states that any release of industrial capacity should be focused in locations that are (or planned to be) well-connected by public transport, walking and cycling, and contribute to other planning priorities including housing, affordable housing, schools and other infrastructure. We support this part of the policy, as where industrial land is appropriately released (in a rigidly monitored and manged way) it should be in well-connected locations which can be developed sustainably for alternative uses.

Part G states that Boroughs should ensure that the need to retain sufficient industrial and logistics capacity is not undermined by permitted development rights by introducing Article 4 Directions.
We support this part of the policy, particularly if these prevent the conversion of industrial to other uses i.e. housing.

Part H states that large-scale development proposals for industrial floorspace should consider the scope to provide smaller industrial units suitable for SMEs. For the reasons set out in Section 3, we suggest that this part of the policy is omitted. A strategic directive for small units is neither necessary nor appropriate, and should be left to Boroughs to introduce if evidence indicates that there is both unmet need and demand for it, and that it won’t constrain new development.

Paragraph 6.4.5 defines industrial capacity as existing floorspace, or potential floorspace that could theoretically be accommodated at 65% plot ratio – whichever is greater. As set out in Section 1, the examples of recent SEGRO developments, together with data that CBRE has collated on recent industrial developments across London demonstrates that a plot ratio of 45% is far more relevant to modern industrial development than the 65% set out in the current Draft Policy. The plot ratio set out in 6.4.5 is critical to the effectiveness of industrial intensification policy, and so a plot ratio of 45% must be a taken forward into the new London Plan in place of the 65% ratio used currently.

Paragraph 6.5.4 states that the principle of no net loss of floorspace capacity does not apply to sites previously used for utilities infrastructure or land for transport functions which are no longer required. We would question whether this is appropriate given that the pipeline for industrial land release is so considerable and well exceeds what the benchmark release levels are. Instead we suggest that such land should be redeveloped for industrial use in locations where evidence indicates there is unmet need – i.e. in locations other than those identified as ‘release capacity’ in the Draft London Plan.

User: UPS

- It is necessary to ensure that there is the right capacity in the right place
- Overall, need MORE industrial space
- We suggest that there needs to be more understanding why there are vacancies in some areas before industrial space is released. For example, the plan highlights three boroughs (Barking & Dagenham, Havering and Newham), all in the Thames Gateway, have been identified for 'limited release' due to higher vacancy rates. Is this due to lack of public transport or transport links? UPS operates a depot in Barking (3/5 Thames Road, Barking, Essex, IG11 0HB) which came under a compulsory purchase order last year from the Council who would like to turn the site into a residential development. This is a key site in our network and if we are forced to move this will cause disruption to our operation and our employees.
- It is essential to protect freight and logistics land. If logistics operations keep being moved further out of London this will create more journeys into the centre to make deliveries as businesses will still need to receive and send goods. It will also negate the ability to use electric vehicles as the journeys will be too long to utilise low emission vehicles so ultimately will create more congestion and will contribute to emissions issues.
- Also, need more space for HGV parking and place for drivers to rest to comply with regulations.

User: SEGRO

SEGRO Proposed Policy Amendments to the Draft London Plan

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

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

1. light and general industrial uses
2. storage and logistics/distribution including 'last mile' distribution close to central London and the Northern Isle of Dogs, consolidation centres and collection points
3. secondary materials and waste management
4. utilities infrastructure
5. land for sustainable transport functions including intermodal freight interchanges, rail and bus infrastructure
6. wholesale markets
7. emerging industrial-related sectors
8. flexible (B1c/B2/B8) hybrid space to accommodate services that support the wider London economy and population
9. low-cost industrial and related space for micro, small and medium sized enterprises ***[DELETE: (see also Policy E2 Low-cost business space)]*** taking into account strategic and local employment land reviews, industrial land audits and the potential for intensification, co-location and substitution (see Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function).

B London's land and premises for industry, logistics and services falls into three categories:

1. Strategic Industrial Locations (SIL) – see Policy E5 Strategic Industrial Locations (SIL)
2. Locally Significant Industrial Sites (LSIS) - see Policy E6 Locally Significant Industrial Sites
3. non-Designated Industrial Sites - see below.

C The retention and provision of industrial capacity across the three categories of industrial land set out in part B should be planned, monitored and managed, having regard to the industrial property market area and borough-level categorisations in Figure 6.1 and Table 6.2. This should ensure that in overall terms across London there is no net loss of industrial floorspace capacity (and operational yard space capacity) within designated SIL and LSIS. **The identification and allocation of land for new industrial capacity in borough development plans will be necessary in boroughs identified as needing to 'provide capacity'**. Any release of industrial land in order to manage issues of long-term vacancy and to achieve wider planning objectives, including the delivery of strategic infrastructure, should be facilitated through the processes of industrial intensification, colocation and substitution set out in Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function.

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

1. are accessible to the strategic road network and/or have potential for the transport of goods by rail and/or water transport
2. provide capacity for logistics, waste management, emerging industrial sectors or essential industrial-related services that support London's economy and population
3. provide capacity for micro, small and medium-sized enterprises
4. are suitable for 'last mile' distribution services to support large-scale residential or mixed-use developments subject to existing provision.

E Any release of industrial capacity in line with part C should be focused in locations that are (or are planned to be) well-connected by public transport, walking and cycling and contribute to other planning priorities including housing (and particularly affordable housing), schools and other infrastructure.

F Efficient wholesale market functions should be retained to meet London's requirements whilst enabling opportunities to consolidate composite wholesale markets to meet long-term wholesaling needs.

G Boroughs should ensure that the need to retain sufficient industrial and logistics capacity is not undermined by permitted development rights by introducing Article 4 Directions where appropriate.

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

Subtext:

6.4.5 Based upon this evidence, this Plan addresses the need to retain sufficient industrial, logistics and related capacity by seeking, as a general principle, no overall net loss of industrial floorspace capacity across London in designated SIL and LSIS. Floorspace capacity is defined here as either the existing industrial and warehousing floorspace on site or the potential industrial and warehousing floorspace that could be accommodated on site at a ***[DELETE: 65]*** **45** per cent plot ratio83 (whichever is the greater). **Flexibility on the principle of no net loss of floorspace may be applied in exceptional circumstances where innovative forms of development are not supported in viability terms, and where the replacement industrial provision represents a significant qualitative improvement on the existing premises in terms of its ability to meet the needs of modern industrial and logistics operators.** ***[DELETE: The principle of no net loss of floorspace capacity does not apply to sites previously used for utilities infrastructure or land for transport functions which are no longer required.]***

User: Roca Investments

The draft London Plan goes further than the current plan in protecting against loss of industrial land, with a principle of ‘no net loss’ of industrial floorspace capacity. In the case of Southwark; the borough has, alongside its adjacent neighbours been identified to ‘retain capacity’. However, the delivery of the Bakerloo Line Extension and its associated benefits is predicated on the redevelopment of the area for new homes in accordance with the aspirations of the Boroughs AAP.

Poor quality industrial sites such as some located within the Bermondsey / Old Kent Road / Surrey Canal Area SIL offer the greatest opportunity to deliver mixed use development schemes in sustainable locations on brownfield land; accordingly this will allow London to grow without impacting on the Metropolitan Green Belt. We are concerned that the protection of industrial land in locations such as Southwark through a blanket no net loss of industrial floorspace is inflexible and will hinder the delivery of mixed developments.

The draft wording of Policy E4 suggests that the opportunity for the release of such sites for other uses may not be appropriate, despite these sites potentially having no further use as an industrial function. Part C of Policy E4 states that the retention and provision of industrial capacity across all types of industrial land should be planned, monitored and managed in accordance with the London wide management of floorspace capacity which is based on individual Local Planning Authorities (LPAs). This does not take into consideration site-by-site factors such as the ever evolving character of the area, shifts in the market, the constant strive to create mixed-use sustainable locations and the characteristics of the existing buildings and structures on the site.

Only 3 out of the 35 LPAs within London have been identified as suitable for ‘Limited Release’ of industrial land. Accordingly, this indicates that the release of industrial land for intensification, colocation or substitution in accordance with Policy E7 will be difficult to achieve outside of these boroughs. We therefore consider clarity should be provided in respect to the practical application of intensification and co-location policies on a strategic London-wide level.

User:	Notting Hill Housing Trust
NHHT support the crucial role SIL and LSIS play in supporting London’s industrial and logistic economy and in providing jobs for Londoners.	

User:	Construction Products Association

1. Industrial factories and warehouses account for less than 1% of London’s construction output, but structural shifts in retail, from high street to online, raise demand for storage, logistics and distribution space and will increase demand particularly in strategic locations.

User: Chartered Institute of Architectural Technologists

Economy

Policies E1 to E11

We are in agreement with the proposals contained in the plan.

User: London Riverside BID

The industrial and logistics sector is central to ensuring not only that London remains economically globally competitive but to make sure that its residents and businesses continue to have access to the range of goods and services that they need on a daily basis. Ensuring the sector can function efficiently underpins a key contributor to the efficient working of the capital's economy and the well-being of its residents.

According to the GLA's evidence base, land for industry and logistics is being lost at three times the anticipated level of release in the current London Plan, a rate which is unsustainable. This is happening despite a policy in the current London Plan to ensure that London protects and retains the land it needs to for these key purposes. It is essential that the draft London Plan ensures an adequate supply of appropriate land for industry and logistics is maintained in the appropriate locations to prevent unsustainable losses of capacity. Where any losses occur, these should be rebalanced on a London wide basis through allocating new land in the right locations to ensure London retains the industrial and logistics capacity it needs to sustain the capital's population and economic growth.

The BID's key concerns are:

1. There is insufficient capacity for industry and logistics in the capital.

According to the GLA's evidence base, land for industry and logistics is being lost at three times the anticipated level of release in the current London Plan, a rate which is unsustainable. This is happening despite a policy in the current London Plan to ensure that London protects and retains the land it needs to for these key purposes. It is essential that the draft London Plan ensures an adequate supply of appropriate land for industry and logistics is maintained in the appropriate locations to prevent unsustainable losses of capacity.

2. The intensification of industrial land is not the silver bullet.

It will not address the lack of supply of industrial land nor will it enable the potential of London's growth locations such as Opportunity Areas (OAs) and transport nodes to be realised. Whilst we welcome the policy support for this innovative approach to industrial development it will not work for all types of uses and all industrial sites.

3. The Plan should enable an increase in supply of premises for industrial and logistics.

The plan’s policies should encourage and enable boroughs to identify new industrial sites through the development plan process – this includes bottom up reviews of the green belt, new sites within OAs or new sites in and around town centres.

4. There should be stronger policy protection of industrial uses particularly for non-designated industrial sites.

The plan should provide greater clarity on how industrial capacity will be balanced against the presumption in favour of development of small sites for housing.

5. Policy should recognise the need for open yard and storage space.

This should be a golden thread throughout the policies on industry and logistics. Policy should recognise that this space is critical to the operation of business and is a fundamental component of particular uses such as distribution centres. In particular, policy E7 should recognise that yard space should be re-provided in new developments and should be a priority for new logistics hubs.

User: London Riverside BID

General Comments on the Draft Policy :

- The London Plan is weak on the subject of Employment, referring to floorspace capacity as the metric to gauge the capacity for the Industrial and Logistics sector.

- The importance of the retention and expansion of varying Employment opportunities should be recognised in the plan and should be adopted as a KPI or one of the indices for the monitoring of Policy delivery.

- Should the space allocated in London for the Industrial and Logistics Sector rise in line with the predicted growth of London?
- The Borough's policy on encouraging new inward investment in the Industrial and Logistics sector places further demands on industrial space.
- Public sector service delivery should be resourced to reflect the importance of the Industrial and Logistics Sector to facilitate the growth of the London economy.
- The draft London Plan is unclear on the mechanisms that will be used to manage a no net loss of floor space capacity across the London Boroughs given that some London Boroughs have a limited release allocation with others required to provide capacity.
- Consider a London First Procurement Plan by the GLA family and by the London Boroughs.

User: London Riverside BID

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

Part C of the policy states that that the retention and provision of industrial capacity across SIL, LSIS and non-designated sites should be planned monitored and managed having regard to the borough level categorisations. This categorisation at figure 6.1 and table 6.2 stipulates that new industrial capacity should only be provided in a small number of boroughs/areas including Enfield, Brent, Ealing, Sutton and Wandsworth and the OPDC. The board are strongly of the view that the provision of additional industrial capacity should be encouraged and enabled across all London boroughs through the development plan process subject to a robust evidence base. As per our detailed comments on policy E7 below, intensification and co-location, should not be relied upon as the only solution to deliver additional industrial capacity – bolder solutions may be required to identify new industrial sites including bottom up reviews of the green belt, new sites within OAs or new sites in and around town centres. These bolder solutions are best determined at borough level.

Part C of the policy should also cross reference to policy E7 on non-designated industrial sites to clarify how the 'not net loss' principle applies to these sites.

Parts C and D of the policy should be amended as follows:

C The retention ***[DELETE: and provision]*** *of industrial capacity across the three categories of industrial land set out in part B should be planned, monitored and managed, having regard to the industrial property market area and borough-level categorisations in Figure 6.1 and Table 6.2. This should ensure that in overall terms across London there is no net loss of industrial floorspace capacity (and operational yard space capacity) within designated SIL and LSIS.* ***The provision of new industrial land is encouraged but should be managed through the development plan process.*** *Any release of industrial land in order to manage issues of long-term vacancy and to achieve wider planning objectives, including the delivery of strategic infrastructure, should be facilitated through the processes of industrial intensification, colocation and substitution set out in Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function.* ***It can also be achieved by land use swaps and the allocation of new sites through the development plan process where there is no net loss of industrial capacity.***

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

1) are accessible to the strategic road network and/or have potential for the transport of goods by rail and/or water transport

2) provide capacity for logistics, waste management, emerging industrial sectors or essential industrial-related services that support London's economy and population

3) provide capacity for micro, small and medium-sized enterprises

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

User: British Property Federation

'We welcome Policy E4 'Land for industry, logistics and services to support London's economic function' statement that provision should be made for 'land for sustainable transport functions including intermodal freight interchanges, rail and bus infrastructure' and that 'The retention and provision of additional industrial capacity should be prioritised in locations that are accessible to the strategic road network and/or have potential for the transport of goods by rail and/or water transport'

We believe, however, that planning policy should go further and recognise that land along the river and along the main rail routes into London is a precious commodity and that, where it is - or can be - linked to the strategic road network for onward distribution, there should be a **presumption in favour of transport and logistics use**. By definition, modal transfer from these low-carbon modes to (electrically-powered) road vehicles for final delivery can only take place along the key water and rail arteries.

User: GLA Industrial BIDs Group

Overview

The GLA Industrial BIDs Group established by the GLA to represent the views of the Industrial BID Sector in London. The Group comprises representatives from across the sector including Industrial BIDs and Local Authorities with contributions from other interested parties from the public and private sector, academics. The Group welcomes the opportunity to respond to the London Plan.

General comments

The industrial and logistics sector is central to ensuring not only that London remains economically globally competitive but to make sure that its residents and businesses continue to have access to the range of goods and services that they need on a daily basis. Ensuring the sector can function efficiently underpins a key contributor to the efficient working of the capital's economy and the well-being of its residents.

According to the GLA's evidence base, land for industry and logistics is being lost at three times the anticipated level of release in the current London Plan, a rate which is unsustainable. This is happening despite a policy in the current London Plan to ensure that London protects and retains the land it needs to for these key purposes. It is essential that the draft London Plan ensures an adequate supply of appropriate land for industry and logistics is maintained in the appropriate locations to prevent unsustainable losses of capacity. Where any losses occur, these should be rebalanced on a London wide basis through allocating new land in the right locations to ensure London retains the industrial and logistics capacity it needs to sustain the capital's population and economic growth.

The Group's key concerns are:

1. There is insufficient capacity for industry and logistics in the capital.

According to the GLA's evidence base, land for industry and logistics is being lost at three times the anticipated level of release in the current London Plan, a rate which is unsustainable. This is happening despite a policy in the current London Plan to ensure that London protects and retains the land it needs to for these key purposes. It is essential that the draft London Plan ensures an adequate supply of appropriate land for industry and logistics is maintained in the appropriate locations to prevent unsustainable losses of capacity.

2. The intensification of industrial land is not the silver bullet.

It will not address the lack of supply of industrial land nor will it enable the potential of London's growth locations such as Opportunity Areas (OAs) and transport nodes to be realised. Whilst we welcome the policy support for this innovative approach to industrial development it will not work for all types of uses and all industrial sites.

3. The plan should enable an increase in supply of premises for industrial and logistics.

The plan's policies should encourage and enable boroughs to identify new industrial sites through the development plan process – this includes bottom up reviews of the green belt, new sites within OAs or new sites in and around town centres.

4. There should be stronger policy protection of industrial uses particularly for non-designated industrial sites.

The plan should provide greater clarity on how industrial capacity will be balanced against the presumption in favour of development of small sites for housing.

5. Policy should recognise the need for open yard and storage space.

This should be a golden thread throughout the policies on industry and logistics. Policy should recognise that this space is critical to the operation of business and is a fundamental component of particular uses such as distribution centres. In particular, policy E7 should recognise that yard space should be re-provided in new developments and should be a priority for new logistics hubs.

User: GLA Industrial BIDs Group

General Comments on the Draft Policy:

- The London Plan is weak on the subject of Employment, referring to floorspace capacity as the metric to gauge the capacity for the Industrial and Logistics sector.
- The importance of the retention and expansion of varying Employment opportunities should be recognised in the plan and should be adopted as a KPI or one of the indices for the monitoring of Policy delivery.
- Should the space allocated in London for the Industrial and Logistics Sector rise in line with the predicted growth of London?
- The Borough's policy on encouraging new inward investment in the Industrial and Logistics sector places further demands on industrial space.
- Public sector service delivery should be resourced to reflect the importance of the Industrial and Logistics Sector to facilitate the growth of the London economy.
- The draft London Plan is unclear on the mechanisms that will be used to manage a no net loss of floor space capacity across the London Boroughs given that some London Boroughs have a limited release allocation with others required to provide capacity.

Consider a London First Procurement Plan by the GLA family and by the London Boroughs.

User:	Freight Traffic Control 2050 academic project

There is a need for ‘industrial’ land to be broken down into its constituent parts including logistics for both policy, data reporting and analysis purposes, as these land uses can have very different and in some cases conflicting and competing requirements.

User: Freight Traffic Control 2050 academic project

Non-designated industrial land –the lack of protection of this industrial land (as it accounts for about a third of the total industrial land in London and will fall outside the ‘no net loss’ criteria) is a major concern. Changes in land use on such sites could undermine the overall ‘no net loss’ target, and for such a target to be realistic nondesignated land also requires inclusion.

The rise of ecommerce and the on-demand economy is likely to lead to every greater mile logistics flows to businesses and private individuals in London over the coming years. This delivery journeys typically involve small vehicles (especially vans). The growth in this activity will require an ever-growing number of local fulfilment centres and depots. If trends of recent decades continue (considering the growth in ‘logistics sprawl’ in the parcels sector as depots are continuously relocated towards the edge of the city and beyond, due to site prices and refusals for lease renewals), this will results in an ever-increasing number of vehicle trips with growing stem mileages from depots/fulfilment centre to delivery catchment areas in inner and central London. A limited number of ecommerce retailers may be able to afford suitably located sites to service such activity (given their available cash, and a lack of need to generate profits at present, only to gain market share). But most of the logistics industry and all third-party logistics service providers are not in this financial position, and operate 55 in a sector with very tight, if any profit margin. Therefore ‘logistics sprawl is likely to continue in London and, coupled with the growth in ecommerce and on-demand requirements, will lead to ever-more congested roads into London. Such an outcome will be counter to the Mayor’s traffic and environmental targets, and will also lead to deteriorating goods delivery service levels, thereby affecting London’s economy. Therefore substantial consideration needs to be given to the (i) future total demand for logistics land taking account of changes in the economy, business and technology, (ii) specifically where such land is required (as it is not necessarily desirable that all available logistics space is in outer London given these changes in demand for logistics operations).

User: GLA Industrial BIDs Group

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

Part C of the policy states that that the retention and provision of industrial capacity across SIL, LSIS and non-designated sites should be planned monitored and managed having regard to the borough level categorisations. This categorisation at figure 6.1 and table 6.2 stipulates that new industrial capacity should only be provided in a small number of boroughs/areas including Enfield, Brent, Ealing, Sutton and Wandsworth and the OPDC. The board are strongly of the view that the provision of additional industrial capacity should be encouraged and enabled across all London boroughs through the development plan process subject to a robust evidence base. As per our detailed comments on policy E7 below, intensification and co-location, should not be relied upon as the only solution to deliver additional industrial capacity – bolder solutions may be required to identify new industrial sites including bottom up reviews of the green belt, new sites within OAs or new sites in and around town centres. These bolder solutions are best determined at borough level.

Part C of the policy should also cross reference to policy E7 on non-designated industrial sites to clarify how the 'not net loss' principle applies to these sites.

Parts C and D of the policy should be amended as follows:

C The retention ***[DELETE: and provision]*** *of industrial capacity across the three categories of industrial land set out in part B should be planned, monitored and managed, having regard to the industrial property market area and borough-level categorisations in Figure 6.1 and Table 6.2. This should ensure that in overall terms across London there is no net loss of industrial floorspace capacity (and operational yard space capacity) within designated SIL and LSIS.* ***The provision of new industrial land is encouraged but should be managed through the development plan process.*** *Any release of industrial land in order to manage issues of long-term vacancy and to achieve wider planning objectives, including the delivery of strategic infrastructure, should be facilitated through the processes of industrial intensification, colocation and substitution set out in Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function.* ***It can also be achieved by land use swaps and the allocation of new sites through the development plan process where there is no net loss of industrial capacity.***

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

1) are accessible to the strategic road network and/or have potential for the transport of goods by rail and/or water transport

2) provide capacity for logistics, waste management, emerging industrial sectors or essential industrial-related services that support London's economy and population

3) provide capacity for micro, small and medium-sized enterprises

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

User:	Business for London

Industrial land. The draft plan provides greater protection Industrial Locations (SIL and LSIL). Policy E4 seeks no net loss of industrial capacity across London. This is likely to prove difficult to implement on a site by site basis, particularly as Policy E7 facilitates the intensification and co-location of industrial land which could result in some land being lost to residential use. The amount of industrial floorspace will need to be retained through the more intensive use of sites, e.g. multi-storey warehouses. Such developments are currently quite limited and may well need positive intervention by the Mayor and others to show how this can be successfully realised.

User: East of England Local Government Association

Authorities are also concerned that the processes from redevelopment of industrial land would be ad hoc and welcome the commitment in the London Plan for a strategically co-ordinated process that focuses on intensification as well as the potential for substitution outside London where there is local agreement (policy E7).

The three boroughs identified for limited release of industrial land and floor space are boroughs within the Thames Gateway that link to authorities within the East. The limited release is based on these areas having relatively low values and high vacancy rates. Notwithstanding the general supportive position of the economy policies in the draft London Plan, such as the aim for no net loss of industrial land uses, the application of the intensification approach needs to be applied within these areas. London's industrial study highlighted that two of the three areas assigned for limited release (Havering and Barking & Dagenham) actually saw net increases in floor space between 2001-2016. The report also notes that "there are some signs that occupiers and developers who would previously only consider west London locations are now looking to the east" (CAG, London Industrial Land Demand, page 213). These factors indicate that pursuing of intensification in these areas is a

justified approach and the interaction between the proposed polices could be clearer in this regard.

The protection afforded to secondary materials and waste management in the policies (E4 and E5) is welcome and benefits the vitality of the wider waste supply chain but, so to link with the safeguarding policy on aggregates (SI10), reference could also be made to aggregates within the economic policies.

User: Amazon UK Services Limited

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

Amazon is concerned that policy E4 adopts inconsistent terminology in describing the types of facilities to which this policy is applicable.

Notwithstanding the title of the policy which clearly includes logistics facilities, the policy makes reference to "industrial floorspace" and "industrial capacity". Such phraseology could imply the exclusion of logistics (Class B8) uses. The policy should include a clear definition of 'industrial floorspace' with explicit reference to logistics as well as industrial uses. It should be made explicit that the policy applies to storage and distribution uses.

Amazon support the recognition set out in the new draft London Plan of the importance of providing a wide range of industrial, logistics and related uses to support London's economy including an efficient storage and distribution system which responds to business and consumer demands. Amazon continues to invest in new and expanded distribution facilities. This investment is directly aligned to meeting customer demand and expectations.

Amazon supports the protection of the best industrial land for Class B and related uses. The draft Plan reports a significant transfer of 'industrial land' to other uses occurred over the period 2001 to 2015. Against this background the draft Plan identifies a positive demand for 'industrial land' over the period 2016 to 2041, mostly "driven by strong demand for logistics to service growth in London's economy and population" (paragraphs 6.4.4 refers). It is therefore clear that planning policy needs to support proposals for a range of modern logistics facilities. The implication for boroughs categorised as "Provide" and "Retain" capacity is that they should seek to intensify floorspace capacity to balance supply with demand.

Floorspace capacity has been calculated on the assumption that potential industrial and warehousing floorspace should be accommodated on sites at a 'default' plot ratio of 65%. This is considered to be unrealistic. It appears that no allowance has been made to reflect the requirements of different types of logistics facilities and particular operators, which as evidenced above, can generate very different plot ratios. In this respect, it is clear that a 'one size fits all' approach/aspiration does not reflect reality and the need to provide different types of logistics facilities. Furthermore, Amazon consider that this policy would not be sufficiently flexible to respond to changing requirements, and therefore would be unsound.

Importantly, logistics facilities which achieve plot ratios below 65% are capable of generating very significant levels of employment and provide support to many other businesses, this should be duly recognised by the London Plan. Indeed, the types of facilities operated by Amazon include very significant local employment opportunities and other economic benefits, which typically far exceed those of traditional warehousing operations. Amazon would be happy to provide examples or arrange site visits to existing facilities to demonstrate that the efficient use of a site should not be judged solely on plot ratios.

The draft London Plan seeks to impose a 'one size fits all' approach for new logistics facilities within London. This is inappropriate, inflexible and not based on a sound evidence base and consideration of alternative options. The draft London Plan needs to incorporate greater flexibility in relation to intensification. A default plot ratio of 65% should not be imposed but rather individual proposals should be determined upon their merits. In the absence of such flexibility the existing network of distribution facilities will struggle to meet increasing demands.

Amazon suggest the following amendment to supporting paragraph 6.4.5:

"Based upon this evidence, this Plan addresses the need to retain sufficient industrial, logistics and related capacity by seeking, as a general principle, no overall net loss of industrial floorspace capacity across London in designated SIL and LSIS. Floorspace capacity is defined here as either the existing industrial and warehousing floorspace on site or the potential industrial and warehousing floorspace that could be accommodated on site at a 65 per cent plot ratio[83] (whichever is the greater). The ***principle of no net loss*** *of floorspace capacity does not apply to sites previously used for utilities infrastructure or land for transport functions which are no longer required.* ***The reference to a 65 per cent plot ratio is not intended to impose a minimum requirement upon development. Proposed development should be considered upon its merits having full regard to the particular characteristics and operational requirements of different types of industrial and warehouse businesses.****" [underlined text is Amazon proposed amendment]*

User: Amazon UK Services Limited

In summary, Amazon is concerned that the draft London Plan places too much emphasis on achieving intensification of industrial land capacity through increased plot ratios (the default being set at 65%), with little regard to the practicalities of achieving this or indeed the need to provide for a range of logistic facilities. Such facilities have different and specific requirements in terms of servicing arrangements which in turn affect plot ratios.

Greater flexibility needs to be included within policies E4 and E5 to recognise the merits of particular logistics proposals. Furthermore, greater recognition needs to be given to the fact that despite logistic facilities not achieving the suggested default plot ratio they can nevertheless be significant generators of employment.

In addition to the above the plan should to consider the need to provide a supportive framework to related aspects of the logistics network, including positive encouragement for uses which would support multi-channel retailing in town centres. The changes to the GPDO have gone some way to improving the flexibility in terms of evolving town centres, however, there remains a need to ensure that town centre policies embrace changing consumption practices and are not based on out-dated assumptions about the way people purchase goods.

Amazon would welcome the opportunity to discuss these representations with GLA officers and would be happy to provide some example case studies or arrange a tour of example buildings. In the meantime, should you require clarification on any of the matters raised, then please do not hesitate to contact us.

User:	Surrey County Council

We support Policy E4 which prioritises the retention and provision of additional industrial capacity in locations that provide capacity to support London’s economy and population including waste management.

User: CBRE Global Investing

Policy E4 seeks to ensure that a sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related function is maintained.

Part E of this policy sets out the circumstances for release of industrial capacity, which should be in well-connected locations and contribute towards other planning priorities including housing and affordable housing. This part of the policy is supported as it will allow the release of industrial sites which could be brought into other uses, including housing, in the right locations where sustainably connected.

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

Although CBRE Global Investors support the overall objective of this policy, to ensure a sufficient supply of industrial, logistics and services land is maintained, CGRE GI would like to express serious concern with regards to Part H. As discussed above in relation to Policy E2, the provision of units suitable for SMEs is unfeasible to many industrial and logistics operators across London. Locational and contextual factors in some areas of London mean there is no demand for SMEs and their provision is unviable. Secondly, industrial uses are often not ‘small’ or ‘medium’ sized, and even industrial companies classed as SMEs, will require larger spaces to operate with a single footprint on a dedicated site due to the nature of their operations. These occupiers would not typically share units, and have bespoke servicing and operational requirements relevant to the development of bespoke sites, and cannot facilitate the introduction of other types of workspace within new developments. Management, security and lease structure issues will also make such a requirement unattractive to and unworkable for landlords, landowners and developers.

As discussed above in relation to policy E2, 2,500 sq m is not a major development scheme, even more so for industrial uses. The threshold should be significantly higher to capture such requirement only on major regeneration schemes with the capacity to offer a range of types of industrial space, including the above.

Where such space is desirable from a market and occupier perspective, developers will likely factor this in in any case to new developments or redevelopments of existing industrial sites in the appropriate locations.

Policy Amendment Sought

The requirement for large-scale industrial space of over 2,500sqm GIA to also provide smaller units, is not considered appropriate and as such, **part H of Policy E4 should be removed** or amended to stipulate a far higher floorspace threshold, appropriate to the scale of large industrial developments.

User: 313-349 Ilderton Road LLP

Policy E4 Land for industry, logistics and services to support London's economic function seeks to maintain a sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions should be maintained.

The established principle of release and intensification of Strategic Industrial Locations (SIL) is supported but note that planning applications within the Opportunity Areas on designated SIL must prioritise the wider planning objectives in terms of delivering residential development,. The employment function of SIL should be managed through local development plan policy and based upon a regular / monitored position of demand for industrial uses, as identified below. Where supply of floorspace exceeds demand priority for re-use should be given to residential-led development.

User: Catalyst Housing Limited

SIL

Draft Policy E4 relates to land for industry, logistics and services. Amongst other things, it sets out the three categories, being SIL, LSIS and non-designated Industrial Sites. Part C states that in overall terms across London there should be no net loss of industrial floorspace capacity within designated SIL and LSIS. It states that the release of industrial land should be facilitated through the processes of industrial intensification, co-location and substitution. The supporting text explains the 'provide capacity', 'retain' and 'limited release' categories. Only three Boroughs fall within the limited release category, all within the Thames Gateway.

Draft Policy E5 relates to SIL. Part D presumes against uses not listed in the policy (including residential) except in areas released through a strategically co-ordinated process of SIL consolidation – to be carried out through a planning framework or Development Plan document.

It is possible that the 'provide capacity', 'retain' and 'limited release' categories pertaining to each of the Boroughs may change over the life of the Plan, particularly as technology is advancing rapidly. We therefore think some provision should be introduced to the policy to enable the Mayor, in consultation with the relevant Borough(s), to release SIL without needing to go through a plan-led process. It would still be for the Mayor to judge whether release is acceptable on a site by site basis, but the flexibility could enable an appropriate site to come forward more swiftly for alternative uses.

Similar flexibility should be introduced within draft Policy E7. Provision should be made for alternative uses to be considered through a planning application-led approach, not just through the Local Plan and/or through a co-ordinated masterplanning process.

User:	Benhill Residents

Given that the result of huge loss of industrial land in London has negatively impacted on communities living in social housing, we would like to see protection and support of existing / remaining. While it is suggested that in industrial land rate vacancies are above the London average in the Thames Gateway, we feel that these should still be retained. There are other parts of London where there is a lack of industrial land space. There should be a co-ordinated London-wide approach to dealing with this – rather than handing more land over in the Thames Gateway for high-end business sectors.

User: Royal London

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

Part H of the draft policy sets a requirement for SME provision in development greater than 2500 sqm. RL object to the requirement and advice that it should be removed from the policy. A requirement for the provision of units suitable for SME's is unsuitable and creates an unnecessary constraint in the development on often complex and challenging industrial sites. The provision of SMEs is unfeasible or not advantageous to may industrial and logistics operations across London. In its current wording, the policy is likely to be a significant obstacle to the redevelopment of industrial sites to provide enhanced facilities (as part of cycle of improvement and investment) or as part of a mixed-use development in response to policy E7 of the Draft London Plan.

User: Earls Court Public Sector Tenants' Assoc

Given that the result of huge loss of industrial land in London has negatively impacted on communities living in social housing, we would like to see protection and support of existing / remaining. While it is suggested that in industrial land rate vacancies are above the London average in the Thames Gateway, we feel that these should still be retained. There are other parts of London where there is a lack of industrial land space. There should be a co-ordinated London-wide approach to dealing with this – rather than handing more land over in the Thames Gateway for high-end business sectors.

User: Elaine Chambers

Policy E4 Land for industry, logistics and services to support London's economic function and Policy E5 Strategic Industrial Locations and Locally Significant Industrial Sites

Given that the result of huge loss of industrial land in London has negatively impacted on communities living in social housing, we would like to see protection and support of existing / remaining. While it is suggested that in industrial land rate vacancies are above the London average in the Thames Gateway, we feel that these should still be retained. There are other parts of London where there is a lack of industrial land space. There should be a co-ordinated London-wide approach to dealing with this – rather than handing more land over in the Thames Gateway for high-end business sectors.

User: Fairview New Homes

The introduction of Policy E4 is probably one of the highest risks to the delivery of new housing in London at the moment, especially in the context to the blanket restriction on Green Belt release. While we can understand concern about the rate at which industrial land was transferred to other uses, the fact is that if this supply is now to be significantly reduced at a time when housing supply needs to double, then alternative sources of land must be identified by the draft London Plan.
The Development Plans of several London Plans have already embarked on a plan-led release of redundant and underperforming employment land to residential. These transitional sites should be supported by the GLA as positively reflecting the aspirations of Policy E4. As part of new local plan reviews the opportunities to intensify both employment and housing can be examined fully through local plans and the viability in each location tested, including the potential for such locations to provide affordable housing and lower re-provision of employment uses.

An example of where this is already in process is the Old Kent Road Masterplan, where 35% affordable housing has been tested in the context of the desire to intensify development. Applications in this area at 35% affordable housing are demonstrating this certainty and responsible provision is the catalyst to promoting growth rather than a blanket restriction and forcing each scheme to provide detailed viability evidence which further delays delivery of much needed housing.

User:	Living Streets

We strongly support “E. Any release of industrial capacity in line with part C should be focused in locations that are (or are planned to be) well-connected by public transport, walking and cycling and contribute to other planning priorities including housing (and particularly affordable housing), schools and other infrastructure”

User: London Industrial and Logistics Sounding Board

General comments

The industrial and logistics sectors are central to ensuring not only that London remains economically globally competitive but to make sure that its residents and businesses continue to have access to the range of goods and services that they need on a daily basis. Ensuring the sector can function efficiently underpins the efficient working of the capital's economy and the well-being of its residents. Industrial and logistics sectors account for well over 400,000 jobs in London in a wide variety of industries, from food and drink, repair of motor vehicles, and manufacturing, to logistics, waste processing, and transport. Industrial businesses are key to supporting the success of wider sectors, supplying and facilitating the creative and cultural industries, hospitality and leisure, and construction, and fuelling the growth in tech-based enterprise through distribution of goods and services. As London's economy and population grows, London's industry and logistics sectors will need to respond accordingly.

According to the GLA's evidence base, land for industry and logistics is being lost at three times the anticipated level of release in the current London Plan, a rate which is unsustainable. This is happening despite a policy in the current London Plan to ensure that London protects and retains the land it needs to for these key purposes. It is essential that the draft London Plan ensures an adequate supply of appropriate land for industry and logistics is maintained in the appropriate locations to prevent unsustainable losses of capacity. Where any losses occur these should be rebalanced on a London wide basis through allocating new land of an appropriate or equivalent type in the right locations to ensure London retains the industrial and logistics capacity it needs to sustain the capital's population and economic growth.

User: London Industrial and Logistics Sounding Board

The Board's key concerns are:

1. There is insufficient capacity for industry and logistics in the capital.

According to the GLA's evidence base, land for industry and logistics is being lost at three times the anticipated level of release in the current London Plan, a rate which is unsustainable. This is happening despite a policy in the current London Plan to ensure that London protects and retains the land it needs to for these key purposes. It is essential that the draft London Plan ensures an adequate supply of appropriate land for industry and logistics is maintained in the appropriate locations to prevent unsustainable losses of capacity. The consequences of insufficient supply of industrial land are potentially significant – impacting on the supply of jobs, congestion on London's roads, air quality, and economic growth. Scarcity also creates a vicious cycle, with industrial rent values rising, pricing out businesses and causing relocations, as well as diminishing the attractiveness of redevelopment at higher densities due to the capital cost involved.

2. The intensification of industrial land is not the silver bullet.

It will not address the lack of supply of industrial land nor will it enable the potential of London's growth locations such as Opportunity Areas (OAs) and transport nodes to be realised. Whilst we welcome the policy support for this innovative approach to industrial development it will not work for all types of uses and all industrial sites and typologies. Further research should be undertaken into how and where intensification can be realistically achieved.

3. The plan should enable an increase in supply of premises for industrial and logistics.

The plan's policies should encourage and enable boroughs to identify new industrial sites through the development plan process – this includes bottom up reviews of the green belt, new sites within OAs or new sites in and around town centres, subject to robust evidence. These will be appropriately tested through the plan examination process.

4. There should be stronger policy protection of industrial uses particularly for non-designated industrial sites.

The plan should provide greater clarity on how industrial capacity will be balanced against the presumption in favour of development of small sites for housing. The plan needs to recognise the importance of non-designated sites and the role they play in supporting local economies and communities. Non-designated industrial sites constitute around 36% of London's industrial land and provide a source of lower cost workspace in the capital. The loss of a large amount of this capacity could have a significant impact, both locally and strategically, particularly where this affects small businesses, the servicing of the Central Activities Zone and the operation of town centres.

5. Policy should recognise the need for open yard and storage space.

This should be a golden thread throughout the policies on industry and logistics. Policy should recognise that this space is critical to the operation of business and is a fundamental component of particular uses such as distribution centres and is required for transport functions

Policy E5 Strategic Industrial Locations (SIL)

User: Transworth Rail

In line with our comments on Policy E4, we have carried out a 'first pass' analysis using the suggested criteria and have identified a number of **new locations for rail-road modal transfer activity** - note **these are additional to sites that are already in such use**. The new sites we propose for inclusion in Table 6.3 and Figure 6.2 are:

1. Southall linked to the A3005

2. Old Oak Common/Wormwood Scrubs linking to the A219

3. Greenford linked to the A4127

4. Park Royal

5. Willesden Junction, linked to the A406/B4492/A4000

6. Neasden, linked to the A406/B4557

7. Cricklewood, linked to the A5/A406

8. Hornsey/Wood Green, linked to the A504/B138/A1080

9. Edmonton, linked to A406

10. Lea Valley, sites between Leyton to Waltham Abbey, using A1055/A110/A406/A503/A104/A106

11. Bow/Stratford, linked to A102

12. Dagenham, linked to A13

13. Charlton, linked to A206/A102

14. Hither Green, linked to A205/A2212

15. Deptford, linked to B207

16. Selhurst/Norwood, linked to A213

17. Clapham North/Nine Elms, linked to A3036/B224/A3216/A3205

18. Tolworth, linked to A240/A3

19. Feltham, linked to A312/A314

20. Wandsworth, linked to A3209/A3205

21. South Acton/Gunnersbury, linked to A406/A315

This list is not intended to be exhaustive, but to give an indication of the locations that should be identified for modal interchange, and accorded a presumption in favour of such use. They range in size, capability and distance from central London but, by linking rail and electric road vehicles, could each perform a crucial role in decarbonising and reducing emissions from freight and logistics across London.

User: Miss Olga Astaniotis

Intensification and co-location are unproven models on a wide scale, and so are insufficient methods by which to retain industrial land capacity. The “let’s build up” approach is incompatible with certain usage types and may also be financially prohibitive for developers. New sites also need to be identified and developed in line with knowledge of future demand, future growth industries and jobs, and future technological and logistical imperatives.

Where is the underpinning research that demonstrates a) if intensification and co-location is viable b) in what form is it viable and what are the timescales for London to achieve this new model and c) for which industries and types of business does it work best/not work at all?

This policy does not make sufficiently strong reference to the need for continued investment in strategic infrastructures, including digital connectivity, utilities and transport to support the continued success and growth of SILs.

User: SUEZ Recycling and Recovery UK Ltd

E5D

SUEZ Recycling & Recovery UK Ltd (SUEZ R&R) welcomes the inclusion of this policy and recognises that, generally, SILs should be protected. However, where sites have already been compromised and constrained, it is not sensible to require retention when the site could meet other needs more sustainably.

SUEZ R&R currently owns and operates a recycling and resource recovery / waste management facility which is located on SIL land within London Borough of Merton (Ref 55 – Hallowfield Way within the Draft London Plan). Although the site is of significant size, operations have become increasingly constrained due to the sensitive nature of the surroundings. The site is located in very close proximity to residential properties, a school, listed buildings a conservation area and metropolitan open land.

SUEZ submitted a planning application for the redevelopment and modernisation of the Hallowfield Way site in 2008 and permission was granted in 2012 following call-in by the Mayor of London, after refusal by the LPA. During the determination of the planning application, due to the sensitive nature of the surroundings, SUEZ R&R had to accept several constraints in order to achieve planning approval, for example:

- Operation of the site was restricted to between 07:00 and 23:00;
- Vehicle movements associated with the development were only permitted between 07:00 and 17:00 Monday – Friday, 07:00 and 12:00 on Saturday and no vehicle movements on Sundays or bank holidays;
- SUEZ R&R to minimise the overall number of bulk haulage vehicle movements to be undertaken during peak school run periods - 08:30 – 09:15 and 14:45 – 15:45.
- SUEZ R&R collection vehicles and bulk haulage vehicles contracted to SUEZ R&R to generally seek to avoid the eastern section of Church Road where practical during all other time periods.
- Compulsory arrival and departure of third party articulated vehicles from the western side of Church Road (right turn in, left turn out).

In recent years, the waste industry has been in a rapid transition and in order for recycling and resource recovery / waste management facilities to be viable and sustainable, particularly in London and the South East, it is essential that operations can be undertaken with efficient processing technologies, economies of scale and in a relatively unconstrained environment. Particularly critical is the ability to transport materials 24 hours a day, or certainly having the flexibility to transport during some of the less congested hours.

Part E of policy E5 reflects the needs of modern recycling and resource recovery / waste management facilities and other industrial uses, in stating that SIL locations should be capable of accommodating industrial type activities which can operate on a 24 hour basis. Furthermore, paragraph 6.5.1 highlights that SIL should be able to *"accommodate activities which - by virtue of their scale, noise, odours, dust, emissions, hours of operation and/or vehicular movements – can raise tensions with other land uses and particularly residential development".* Paragraph 6.5.2 continues, stating that SILs are typically located close to the strategic road network, well located with regard to rail, river, canals and safeguarded wharves and can support the sustainable movement of goods. Access to Hallowfield Way is provided via Church Road, a road which has narrow ‘pinch points’ and passes through the nearby conservation area which borders the site. The site benefits from few of the characteristics outlined within the London Plan which would render it suitable for ongoing industrial and employment uses.

The permission for the redevelopment of Hallowfield Way was implemented in 2015, however, due to the constraints placed on the planning permission, the site has never proven to be economically viable to develop fully. Consequently, SUEZ R&R has had to take the decision to identify an alternative site elsewhere within South London which is suitable and viable for the development of modern recycling and resource recovery / waste management operations.

Consequentially, Hallowfield Way SIL will now be available for redevelopment and at this stage, taking account of the sensitivity of the surroundings and the constraints placed on the previous redevelopment, the site is not suitable for continued industrial uses. Similarly, if the site was to be looked at as a ‘blank canvas’ it is unlikely that it would be designated as SIL today.

Taking account of the above, SUEZ R&R, therefore recommends that the site should be removed from SIL designation and/or the policy should be reworded as follows

1. *Development proposals for uses in SILs other than those set out in part C above, (including residential development, retail, places of worship, leisure and assembly uses), should be refused* ***except where it can be demonstrated that the operation of the SIL has been compromised and is no longer considered to be compatible with surrounding land uses****, or in areas released through a strategically co-ordinated process of SIL consolidation. This release must be carried out through a planning framework or Development Plan document review process and adopted as policy in a Development Plan or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough.*

E5E

SUEZ R&R welcomes this policy. It is essential that existing facilities are safeguarded from encroachment by sensitive developments which constrain operations.

User: SUEZ Recycling and Recovery UK Ltd

SUEZ Recycling and Recovery UK Ltd (SUEZ R&R) currently owns and operates a recycling and resource recovery / waste management facility which is located on SIL land within London Borough of Merton (Ref 55 – Hallowfield Way within the Draft London Plan). Although the site is of significant size, operations have become increasingly constrained due to the sensitive nature of the surroundings. The site is located in very close proximity to residential properties, a school, listed buildings a conservation area and metropolitan open land.

SUEZ R&R submitted a planning application for the redevelopment and modernisation of the Hallowfield Way site in 2008 and permission was granted in 2012 following call-in by the Mayor of London, after refusal by the LPA. During the determination of the planning application, due to the sensitive nature of the surroundings, SUEZ R&R had to accept several constraints in order to achieve planning approval, for example:

- Operation of the site was restricted to between 07:00 and 23:00;
- Vehicle movements associated with the development were only permitted between 07:00 and 17:00 Monday – Friday, 07:00 and 12:00 on Saturday and no vehicle movements on Sundays or bank holidays;
- SUEZ to minimise the overall number of bulk haulage vehicle movements to be undertaken during peak school run periods - 08:30 – 09:15 and 14:45 – 15:45.
- SUEZ collection vehicles and bulk haulage vehicles contracted to SUEZ to generally seek to avoid the eastern section of Church Road where practical during all other time periods;
- Compulsory arrival and departure of third party articulated vehicles from the western side of Church Road (right turn in, left turn out).

In recent years, the waste industry has been in a rapid transition and in order for recycling and resource recovery / waste management facilities to be viable and sustainable, particularly in London and the South East, it is essential that operations can be undertaken with efficient processing technologies, economies of scale and in a relatively unconstrained environment. Particularly critical is the ability to transport materials 24 hours a day, or certainly having the flexibility to transport during some of the less congested hours.

Part E of policy E5 reflects the needs of modern recycling and resource recovery / waste management facilities and other industrial uses, in stating that SIL locations should be capable of accommodating industrial type activities which can operate on a 24 hour basis. Furthermore, paragraph 6.5.1 highlights that SIL should be able to "accommodate activities which - by virtue of their scale, noise, odours, dust, emissions, hours of operation and/or vehicular movements – can raise tensions with other land uses and particularly residential development". Paragraph 6.5.2 continues, stating that SILs are typically located close to the strategic road network, well located with regard to rail, river, canals and safeguarded wharves and can support the sustainable movement of goods. Access to Hallowfield Way is provided via Church Road, a road which has narrow ‘pinch points’ and passes through the nearby conservation area which borders the site. The site benefits from few of the characteristics outlined within the London Plan which would render it suitable for ongoing industrial and employment uses.

The permission for the redevelopment of Hallowfield Way was implemented in 2015, however, due to the constraints placed on the planning permission, the site has never proven to be economically viable to develop fully. Consequently, SUEZ R&R has had to take the decision to identify an alternative site elsewhere within South London which is suitable and viable for the development of modern recycling and resource recovery / waste management operations.

Consequentially, Hallowfield Way SIL will now be available for redevelopment and at this stage, taking account of the sensitivity of the surroundings and the constraints placed on the previous redevelopment, the site is not suitable for continued industrial uses. Similarly, if the site was to be looked at as a ‘blank canvas’ it is unlikely that it would be designated as SIL today.

Taking account of the above constraints, SUEZ R&R, recommends that Hallowfield Way is removed as SIL. Alternatively, SUEZ R&R recommends that policies are included within the London Plan which allow the designations to be reviewed where sites have become constrained and an opportunity for redevelopment exists.

User:	London Forum of Amenity and Civic Societies

London Forum **strongly supports** the new strategy for proactive management, diversification, co-location of business uses and resistance of housing. We support the application of the Agent of Change principle as a guarantee for noisy industrial uses.

In **Policy E5 B 2)** add the words 'better links to public transport' after “improvements”.

User: London Assembly Green Party Group

(See also my comments on policy E4)

Proposed amendments to policy E5

Alteration to part A (changes highlighted in bold, deletions italic):

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

Delete from part D (deletionin bold and italic):

This release must be carried out through a planning framework or Development Plan document review process and adopted as policy in a Development Plan ***or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough***.

User: Aviva Investors

Aviva Investors own the Barwell Industrial Estate and adjoining land (no. 48 in Table 6.3) in Chessington (Royal Borough of Kingston upon Thames).

Planning policy is very important to Aviva Investors as it can provide greater certainty in the planning and implementation of future investment.

Aviva Investors welcome the continued allocation of the Barwell Industrial Estate as a Strategic Industrial Location (SIL) in Policy E5 and the recognition (part (A)) that SILs "*should be managed proactively through a plan-led process to sustain them as London's main reservoirs of industrial, logistics and related capacity for uses that support the functioning of London's economy*".

Aviva Investors welcome the acknowledgement in part (B)(3) that boroughs, in their Development Plans, should "*explore opportunities to intensify and make more effective use of land in SILs in Development Plan reviews*…".

Aviva Investors note the list of broad industrial-type uses (set out in part (C)) that should be supported in SILs. Aviva Investors also note the 'other uses' listed in part (D) that should be refused in SILs but welcomes the exception in areas released through a strategically co-ordinated process of SIL consolidation, which must be carried out through a planning framework or Development Plan Document review process and adopted as policy in a Development Plan or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough.

User: British Retail Consortium

The BRC is supportive of intensification of space, however, additional residential repurposing should not come to the detriment of viable commercial space. Viability can be tested as paragraph 6.7.4 outlines by demonstrating there is “no reasonable prospect” for occupation or redevelopment. Given pressures on land it has become increasingly difficult to identify sites for certain types of retail warehouse/distribution centres fulfilling instore and online trading.

Due to consumer behaviour, there is a strong case that some retail space should be considered for intensification alongside industrial uses. For example, there may be opportunities for limited retail uses catering to merchants/builders alongside industrial uses. The draft states “boroughs should take into account integrated strategic and local assessments of demand and capacity for both comparison and convenience goods retailing”. However, the draft does not take into account pressures facing bulky comparison goods shopping. There should not be a requirement to refuse development catering to merchants/builders as suggested in E5-D. Instead this should be considered on a local basis which would bear in mind whether there is adequate availability for home improvement retail in the area.

User: Gazeley UK Ltd.

Policy E5 needs to clearly and strongly protect against the loss of Strategic Industrial Locations (SIL). In order for London continue to grow, thrive and function the ability to service and support existing and future residential development needs to be maintained. The only way this can be acheived is ceasing the continued loss of industrial land for altenative uses such as a residential. As the population of London becomes more relaint on e-retailing to meet consumer needs, the industrial infrastructure required to support this demand must be protected. SIL allocations need to be protected at all costs.

Gazeley supports the intensification of SIL however individual Local Authorities must not see intensification as a substitute for allocating new fit for purpose industrial land required to meet London's needs. The identified SIL are already densely developed and often comprise a multitude of landownerships consequently limited opportunities exist for intensification. Where intensification is acheivable on a windfall basis this should be recognised as being in addition to identifying new industrial land to meet employment land targets.

User: Tate and Lyle Sugars

- We strongly support the principle of “no net loss of industrial floorspace capacity (and operational yard space capacity) within designated SIL and LSIS.”
- We very strongly support policy E5.5

Comments & Suggested Amendments

- However we think E.5.5 could be improved by emphasising the importance of distance as the primary design mitigation principle followed by others listed below
- Therefore we would suggest the following amend (amend in **bold)** “Development proposals within or adjacent to SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial-type activities and their ability to operate on a 24-hour basis. In line with Agent of Change principles (Policy D12 Agent of Change) residential development adjacent to SILs should be designed to ensure that the industrial activities are not compromised or curtailed. **Distance from industrial-type activities should be the primary design mitigation principle. Following this** particular attention should be given to layouts, access, orientation, servicing, public realm, air quality, soundproofing and other design mitigation in the residential development."
- It should be made clear that any residential development adjacent to SILs will necessarily be less intensive than elsewhere, in order to allow for appropriate distance and mitigation.

User: Home Builders Federation

The policy is unsound because Part D conflicts in part with national policy.

We appreciate the importance of safeguarding Significant Industrial Locations (SIL) in London. Unlike some policies in the draft London Plan this is an issue that it is quite appropriate for the draft London Plan to address.

However, it is clear that the Mayor has allowed some of the boroughs, to allocate SIL sites for residential development. This is described in paragraph 2.57 of the SHLAA 2017. It is unclear how many SIL sites have been exempted (the SHLAA does not provide the detail) but we expect it includes some.

We support part D that allows the re-development of SIL sites for other uses (other than those set out in Part C). We agree that this should be done through the preparation of an up-to-date Development Plan (although this should be changed to Local Plan). We are not sure that it should be allowed through the other channels that are referred to in part D.

We are not sure what a ‘planning framework’ is as referred to in this paragraph, or what is meant by a “coordinated master-planning process in collaboration with the GLA or relevant borough”. If it is vital that existing SIL sites are protected then the re-allocation of these should only be allowed to occur through a Local Plan that is open to proper public scrutiny. This Local Plan will be prepared with reference to the draft London Plan.

Part D should be amended to omit the references to planning frameworks and master-planning as it is unclear what these are and because strategic allocations – including a change of use from one strategic use into another - should really only be made through a Local Plan (NPPF, paragraph 47).

User: Battersea Society Planning Comittee

Policy E7 Intensification, co-location and substitution of land for

industry, logistics and services to support London's economic

function ; Policy SD5 Offices, other strategic functions and residential

development in the CAZ

We welcome the objective in **Policy E5 for** retaining SILs. However we are concerned that Policy E7 which supports intensification through delivery of residential and other uses in SILs could severely affect the nature and level of employment in the Queenstown Road SIL where pressure from residential development is high. This is one of the few remaining areas for small and mixed businesses serving the opportunity area and the rest of CAZ. We therefore consider that **Policy SD5** needs to be applied sensitively in this area and we would hope that the employment capacity in Battersea is not reduced by substitution of business use for residential.

While we are not opposed to intensification of employment areas it must be set in a wider local context of proper internal road access, delivery and parking provision linked to external major routes and public transport

User: Port of London Authority

The PLA broadly supports this policy, particularly part E, which references the Agent of Change principle. Please note the PLA's comments regarding the Agents of Change principle in response to draft policies SI15 and D12 in section one above.

The PLA considers that there should be a specific reference to ensuring that access routes to industrial locations are considered to ensure that appropriate access is retained and the integrity and effectiveness of the designated area is not compromised. The PLA recommend the following amendment to policy E5, part E:

Suggested amendment to E5 part E

"Development proposals within or adjacent to SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial-type activities and their ability to operate on a 24-hour basis. In line with Agent of Change principles (Policy D12 Agent of Change) residential development adjacent to SILs ***or along access routes to them*** *should be designed to ensure that the industrial activities are not*

compromised or curtailed. Particular attention should be given to layouts, access, orientation, servicing, public realm, air quality, soundproofing and other design mitigation in the residential development."

User:	Brett Group

Brett broadly support the principles of Policy E5 and Strategic Industrial Locations, noting that the siting of these around existing industrial uses is key to the longer term future of existing industrial sites and protection from ‘encroachment’ from non-compatible land uses. We welcome a strengthening of the policies which should assist in protecting and maintaining SIL land. In particular Brett welcome the continued designation of area ’45 Thameside East’ within the plan.

User: PPHE Hotels Group

PPHE recognises the importance of Strategic Industrial Land (SIL) and agrees that it should be protected and intensified so as to optimise its use, enhancing its attractiveness and competitiveness where relevant. However, PPHE also believe that non-SIL uses can complement SIL uses as part of mixed use schemes. Policy as currently proposed includes no flexibility to facilitate such mix uses. Accordingly, it is unduly restrictive, and as such fails to promote development and flexible use of land as the NPPF [157] exhorts. This lack of flexibility is a potential barrier to investment; the antithesis of what the NPPF is seeking [160]. In this respect the London Plan is not positively prepared, justified, effective or consistent with the NPPF.

Policy E5 part C states that development proposals in SILs should be supported where the uses proposed fall within the broad industrial-type activities, such as

• light industrial (Use Class B1c)
• general industrial uses (Use Class B2)
• storage and logistics/distribution uses (Use Class B8)
• other industrial-type functions, services and activities not falling within the above Use Classes including secondary materials and waste management, utilities infrastructure, land for transport and wholesale markets
• flexible B1c/B2/B8 premises suitable for occupation by SMEs
• small-scale ‘walk to’ services for industrial occupiers such as workplace crèches or cafés.

Part D goes on to state that “development proposals for uses in SILs other than those set out in part C above, (including residential development, retail, places of worship, leisure and assembly uses), should be refused except in areas released through a strategically co-ordinated process of SIL consolidation. This release must be carried out through a planning framework or Development Plan document review process and adopted as policy in a Development Plan or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough.”

Whilst we agree that SIL should continue to provide and protect a mixture of industrial uses as set out above, we believe that in the right location where sites that are providing modern efficient SIL uses, the GLA should consider other additional complementary non-SIL uses to further ‘optimise development.’ For example, in gateway locations next to transport links, other non SIL uses (subject to design and townscape considerations) could be considered acceptable above these SIL uses. By doing this, you would be maximising SIL floorspace on site in locations well served by transport connections and providing additional uses on top that would not prejudice the SIL use but continue to generate employment which is a key driver for London. Such non SIL uses must demonstrate that they would not inhibit existing or potential SIL uses on adjoining sites so that they complement the SIL uses both on and off site.

It is therefore recommended that Policy E5 C should be amended to be more flexible and allow for some sites to provide other non SIL complementary uses, in addition to SIL uses where suitable and where it would not jeopardise the SIL use.

User:	Galliard Homes

Galliard supports the principle of Policy E5 – Strategic Industrial Land (SIL's), part E; where `in line with the Agent of Change principles, residential development adjacent to SILs should be designed to ensure that the industrial activities are not compromised or curtailed'. We believe that where efforts have been made to accommodate such environments, through carefully considered design and technical mitigation on sites adjacent to public transport networks, proposals should be supported by the GLA and LPAs.

User:	City of London Corporation

The City Corporation welcomes the specific requirement that provision should be made for storage and logistics/distribution close to central London, consolidation centres and collection points. The provision of off-site consolidation is essential to ensure that significant office development in the City and the wider CAZ can proceed without having a significant adverse impact on transport networks and air quality. The lack of suitable sites within the City and the CAZ means that such provision needs to be considered on a more strategic level.

User:	London Borough of Barnet
Support de-designation of North London Business Park. Support designation of Staples Corner	

User:	Freight Transport Association

Policies E5 & E6 Strategic Industrial Locations and Locally Significant Industrial Sites page 239
As mentioned above, the ‘no net loss’ principle only applies to designated industrial land which is just 64 per cent of industrial land, leaving 36 per cent at risk. Non-designated industrial land tends to be small pieces of land but is nevertheless important, particularly in dense locations in central and inner London. The non-designated status should be removed and all land used for logistics purposes should be either strategic or locally significant in order to protect those sites.

User: London Assembly Labour Group

Suggested changes

“nurseries” should be added to E5C6 which now reads “small-scale ‘walk to’ services for industrial occupiers such as workplace crèches, nurseries or cafés.”

Justification for policy recommendations

Workplace creches can be expensive and there is a shortage of affordable nurseries in London.

Suggested changes
The Policy needs to be much stronger in seeking to retain SIL wherever possible.
The Policy has been tightened to exclude non-industrial uses (including retail, places of worship, leisure and assembly uses), with no assessment on the impact on these other uses.

User:	London Waste and Recycling Board (LWARB)

1. We believe sustainable “last mile” distribution mentioned in 6.5.2 should be supported by micro consolidation and distribution sites to ensure deliveries and collections are reduced as far as possible across London.

User:	London Waste and Recycling Board (LWARB)

1. We support paragraph 6.5.3 which states innovations to make more effective use of land in SILs are encouraged and should be explored in Local Plan reviews and Opportunity Area planning frameworks. We recommend that this should be expanded upon to encourage exploration of land use which supports a low carbon circular economy such as co-location of businesses with complimentary needs, or industrial symbiosis opportunities thereby reducing the need for storage and transport, optimising space and building use and reducing waste.

User: London Borough of Lambeth

Lambeth supports the overall approach and agrees with its ‘retain’ classification. In practice it has been very difficult to retain industrial capacity through the planning system to date, given a perceived inter-changeability of industrial uses and B1a office space. It is hoped that the specific emphasis on industrial capacity defined as specific use classes will assist with this. Clarification of the approach on yardspace (as opposed to floorspace) is also welcome, although this needs to be carried through into the monitoring approach set out in Chapter 12 (reference only to industrial floorspace).

Please could the London Plan clarify whether B1b space for research and development of products and processes is intended to fall within the definition of industrial capacity – some of the supporting evidence suggests that it is, but there is no mention in the Plan itself. In Lambeth’s view, B1b should be included within the definition of ‘industrial’. Some sui generis uses should also be included within the definition of industrial capacity e.g. some waste uses, some operational uses – there is no mention of these in the Plan.

With regard to potential for intensification of industrial land, in Lambeth’s view this should not be considered to mean allowing residential uses within industrial areas on a systematic basis. Historically Lambeth allowed mixed-use areas within some of its LSIS (under the Lambeth UDP 2007) and this resulted in quite a rapid erosion of these designated areas, such that a number have now been de-designated. Lambeth has since removed these mixed-use areas and does not intend to revisit that policy approach.

User: Create Streets

Better Brownfield: How to banish boxland and turn it into popular, mixed-use London-like neighbourhoods and streets without losing jobs or shops

Relevant Policies:

Chapter 1 Planning London's Future (Good Growth Policies) pp.9-26
D1 London's form and characteristics (p.98)
D8 Tall buildings (p.126)
H1 Increasing Housing Supply (p.144)
E5 Strategic Industrial Locations (SIL) (p.239)
E6 Locally Significant Industrial Sites (p.245)
E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function (p.246)

Greater clarity on mixed-use ‘London-like neighbourhoods’ on brownfield sites. Obviously much of the focus of the London Plan is on building on brownfield sites. The London Plan should more clearly aim to develop brownfield and industrial sites into complex ‘London-like’ mixed neighbourhoods. These should be more clearly described and defined so that they can be measured. The tension between the need for ongoing industrial use and the need for more housing should be explicitly referenced in the London Plan with preference for ‘London-like neighbourhoods’ with maintenance of ongoing use and the importance of streets and urban form reflected more clearly in policies GG2, D1, E7 and H1. The policy on Healthy Streets (T2) should also reflect the need for a good urban form, beauty and lack of high rise wind tunnels materially to encourage walkability.

As London grows there will be competing pressures for land. The draft Plan highlights concerns over the loss of commercial space in the capital and its effects on economic prosperity. Policies E5 and E6 offer protection to Strategic Industrial Land and Locally Significant Industrial Sites. The Mayor is right that productive land uses should not be swept aside to make way for sterile dormitory developments. However, there is a danger that borough officers interpret these concerns too narrowly, settling for the safety of the status quo rather than risk creative change. Land use on boxland industrial sites is rarely optimal and we must not waste the potential to combine uses with better design. Boroughs should therefore critically look at all industrial sites, even those that are operational, to determine if a ‘mixed use’ approach is possible. Landowners of industrial and ‘big box’ retail sites must be even more strongly encouraged to come forward with Mayoral support. Policy E7 is useful in this context but should be more ambitious. It also needs far more reference to issues of good growth and urban form.

User: RICS

Growing a good economy

Through policies **E4, E5, E6 and E7** the Mayor also states the need to protect and enhance London's existing industrial sites. This is a critical issue for a diverse London economy. One of the drawback members suggested is a reluctance amongst planners and developers to locate light industrial (use class B1) within residential developments, even though it is approved in planning policy. This is due to a negative perception of industrial and lack awareness of the benign nature of light industrial properties. Co-locating light industrial alongside residential would make an excellent contribution to the mayor's goal of creating mixed use spaces and help better focus heavy industrial sites by providing more options for occupiers.

User:	London Borough of Brent

The Council supports the principle of this policy, subject to the GLA with regards to Part D having a proportionate and pragmatic approach to considering the opportunities provided by some of the SIL in Brent for wider benefits consistent with the Good Growth Principles of the London Plan. In particular the Council as the GLA is aware would like to progress a wider range of uses/ intensified redevelopment (including at least a replacement of existing employment space/jobs) at Gateway locations taking account of existing Opportunity Areas and proposed improvements to public transport infrastructure, e.g. Wembley Park (Wembley SIL), Neasden (Wembley SIL) and Staples Corner (SIL - related to Thameslink station). This will take account of the need to provide space to satisfactorily accommodate employment uses that might not be conducive to a high quality residential/ social infrastructure/ employment premises environment, such as waste or B2 uses. There is a recognition that such uses will still need to be accommodated within the borough and that notwithstanding the policy D12 ‘Agent of Change’, extensive areas will need to be provided for these types of uses.

User:	London Borough of Bromley

The new policy now includes more detailed mapping for these SILs, which includes designated land at the Foots Cray-Ruxley Corner and St Mary Cray ends of the Cray Business Corridor, but excludes land at Crayfields designated under the Draft Local Plan. The Council’s proposal to define the Cray Business Corridor SIL (with Foots Cray-Ruxley Corner and St Mary Cray as bookends of a larger employment area) is not inconsistent with current or proposed London Plan policies for boroughs to define their own SIL boundary through a Local Plan.

User:	Save Swiss Cottage

Policy E4 Land for industry, logistics and services to support London's economic function and Policy E5 Strategic Industrial Locations and Locally Significant Industrial Sites

Given that the result of huge loss of industrial land in London has negatively impacted on communities living in social housing, we would like to see protection and support of existing / remaining. While it is suggested that in industrial land rate vacancies are above the London average in the Thames Gateway, we feel that these should still be retained. There are other parts of London where there is a lack of industrial land space. There should be a co-ordinated London-wide approach to dealing with this – rather than handing more land over in the Thames Gateway for high-end business sectors.

User: London Councils

As this is a twenty year Plan, it should be sufficiently flexible to accommodate the jobs of the future. In the current draft, E5C and E5D limits what development proposals can be accepted by boroughs in SILs. This also presents risk of SILs being undermined in mixed-use space by the introduction of residential use which can lead to land values and rents rising, displacing industrial tenants. The Plan should give boroughs greater flexibility around use classes and SILs, so that they can maximise the use of land.

This policy also sets out a plan to require boroughs to use local development plans to map and define SILs. While the main thrust of this policy is welcome, intensive mapping activity and policy development may be resource intensive, and difficult for boroughs to deliver alongside other commitments.

However, as also stated in response to E3, the requirement for replacement industrial, storage and distribution uses to be operational in advance of any residential component being occupied may harm the delivery of large sites which are likely to be delivered in phases due to site/delivery constraints and we therefore suggest the wording should be amended to avoid this unintended outcome.

User: CBI

CBI members welcome the Mayor of London’s guidance to ensure SILs are sustained as London’s main reservoirs of industry, and logistics, supporting the functioning of London’s economy (Policy E5). CBI members support the Mayor of London’s proposal to ensure local authorities define the detailed boundary of SILs as it is currently difficult to determine whether a site is within or outside a SILs. Furthermore, businesses note the importance of ensuring this policy is given due prominence by the GLA in future discussions with developers going forward.

Businesses have suggested the guidance should make clear that any residential development, located adjacently to SILs should allow for appropriate distance and mitigation. However, members would like to see the guidance strengthened through emphasising the importance of distance as the primary design mitigation principle. Members have suggested the attention given to factors such as servicing, the public realm, air quality, soundproofing and other design mitigations would help ensure a smooth implementation of the guidance.

User: London Borough of Tower Hamlets

We support this policy and clearer definitions provided. However we do recognise that challenges arise from the changing context around these SILs, in particular Empson Street which is part of our Housing Zone and Hackney Wick, and that the policy should support the transition within SILs to industrial uses which are more compatible with residential uses.

We note the Industrial Intensification Primer and consider it may be useful for the GLA to further consider ways in which industrial and residential development can be designed so as to reduce tensions and conflicts between uses.

Please note, Figure 6.2 needs reviewing, for example, no 35 is shown on Isle of Dogs and should be in Greenwich.

User:	Royal Borough of Kingston

RBK agrees that any loss of employment land should come through as part of a plan-led approach and not through ad-hoc applications. However, residential use should not be included as one of the potential uses for intensification unless there is a planned release as set out in the London Plan. Intensification for other uses are supported except where this can hinder legitimate industrial activity. RBK seeks assurances that sufficient industrial land is protected for current use and future growth, including logistics and distribution to support transport objectives such as freight consolidation, green industries, maker-space and relevant creative industries. For this reason, it is considered that the total land should be protected, not the current capacity which fails to support future growth. RBK supports the deletion of the sub-categories of SIL (**Policy E5**), given that it can add much needed flexibility of uses in these locations and will better allow increases in job density and co-location of different employment uses.

User: London Borough of Waltham Forest

We welcome the recognition of the important role industrial land plays in London's economy; particularly in East London and Outer London.

We support the Mayor's position that there should be no net loss of industrial floorspace capacity in the borough, set out in policy E4 Part C, Figure 6.1 and Table 6.2.

We agree with Policy E4 Part G and have already introduced Article 4 Directions preventing permitted development rights for the change of use from light industrial B1 (C) to residential C3.

We agree with policy E5 part A. We recently commissioned Regeneris Consulting to undertake a Business Audit of our Strategic Industrial Locations and our Borough Employment Areas to see how these could best be proactively managed to sustain them; including what could be achieved through the plan-led process but also through business and regeneration support.

We agree with Policy E5 part D. We are producing an Employment Strategy to underpin our Local Plan and part of this process will be considering if we need to consolidate any of our SIL; particularly in the context of Part E of the same policy.

We support limited release of industrial land as long as there is no net loss of industrial floorspace and are considering options to deliver this within Lea Bridge and Leyton, our key growth area. We are aligned with Policy E7 part A. As a borough with limited land resource and a high housing target and need, we are exploring how and where we can deliver intensification. At present, we are working on two sites to see if this could work. The first site is Low Hall Depot, where we have commissioned work on the feasibility of stacking different uses with industrial. The second site is Rigg Approach, where we are working with the GLA Regeneration Team to see if intensification could work whilst retaining the existing employment floor space. If feasible these will be included as policies within our new Local Plan.

The resource implications of delivering this work across planning, regeneration and business teams need to be recognised, and where possible the Mayor should provide funding and resource to assist in the delivery of proposals for intensification and retention of employment land.

User:	London Borough of Hillingdon
The protection of Strategic Industrial Land (SIL) is broadly supported.	

User: HFFTRA

Policy E4 Land for industry, logistics and services to support London's economic function and Policy E5 Strategic Industrial Locations and Locally Significant Industrial Sites

Given that the result of huge loss of industrial land in London has negatively impacted on communities living in social housing, we would like to see protection and support of existing / remaining. While it is suggested that in industrial land rate vacancies are above the London average in the Thames Gateway, we feel that these should still be retained. There are other parts of London where there is a lack of industrial land space. There should be a co-ordinated London-wide approach to dealing with this – rather than handing more land over in the Thames Gateway for high-end business sectors.

User: London Borough of Merton

Support with amendments While the principle of supporting a dynamic and thriving economy, businesses and jobs is fully supported, there are tensions between these four policies and also with the overall strategy set out for Opportunity Areas in Wimbledon, elsewhere in the Wandle Valley and the Trams Triangle intensification.

The approach set out on industrial land consolidation in E7 with diagrams at Figure 6.3 seems that it will apply in very specific circumstances: for example where industrial land is very valuable and sought after and cannot be sought elsewhere (e.g. beside a major port or major airport). Most industrial land in the Wandle Valley is not like that. The South London Partnership has identified South Wimbledon Business Area and Willow Lane (both SILs and Business Improvement Districts) as being the highest value, highest demand business areas across five boroughs in South London. Even with this, investment in a multi storey B8
warehouse is (a) very unlikely to be viable in these locations, especially when taking account of the requirements set out in Policy E7 1-4 and all connected policies and (b) very unlikely to deliver the business space and jobs that London needs. It seems that collectively these policies are taking an academic approach that may work in specific parts of London (e.g. near airports, ports and motorway corridors) and trying to apply it across the whole of Greater London.

Part of the areas within the Tram Triangle and Opportunity Areas within Wimbledon are designated industrial areas (SIL and LSIS) . We welcome the opportunity to explore making more effective use of land as set out in policy E5 (b)(3) but we consider that it should not be conditional on the approach set out in policy E7. In some cases, land along the Wandle Valley was in historic industrial use and has an industrial use on a specific site that would be unlikely to ever be applied in a modern planning system (for example, the site is in heavy industrial use but for historic reasons is sited beside the river Wandle on residential roads, adjacent schools, homes, nature areas) When this industrial usage ceases, it is reasonable for all appropriate uses to be explored, including for social infrastructure, workspace and homes. Policies on the Tram Triangle, reuse of brownfield land, environmental improvements, modal shift, improving air quality, reducing noise pollution and developing Opportunity Areas support this approach but the series of policies E2-E7 do not allow for this.

Our view is that there is scope for some intensification of business areas – whether designated or undesignated – alongside community or residential use, particularly where these are in retail warehouse use currently. We would welcome a rationalisation of these policies, to focus on the laudable and fully supported aim of supporting London’s economy and jobs, rather than the extensive detail and prescriptive requirements that they set out.

User:	London Borough of Hounslow

LB Hounslow strongly supports policies E5-E8 in unlocking redevelopment of industrial areas, but these policies should make clearer reference linking improved public transport accessibility levels with potential for development. This is principally due to the fact many larger industrial locations are often particularly poorly served by frequent commuter services.

User: AECOM

Our thoughts:

London's previous approach has been to deliver new homes on vacant industrial land. This has resulted in an over-release (circa 100 ha per annum over 5 years), despite increasingly strong demand. This **risks** future economic competitiveness.

Land values create a dichotomy, in which the importance of industrial land competes against higher residential development values. The Draft London Plan's response of no net loss of floorspace recognises a **changed approach** from land to floorspace capacity.

Delivery and viability will be challenging, however this approach offers an opportunity for creative **co-location and intensification** of industry and other uses.

How Can AECOM Help?

AECOM's pan-London experience provides us a unique understanding of the need to provide homes without undermining vital industrial and logistical functions.

AECOM prepared the London Industrial Land Supply and Economy Study (2015), informing this London Plan, which positions us to identify opportunities both in plan preparation and development needs, that coincide with the City for All Londoner's vision embodied within the new plan.

User: Westminster City Council

There seems little point in continuing to categorise boroughs like Westminster with no designated Strategic Industrial Locations or locally Significant Industrial Sites (and very little industrial land of any kind) in table 6.2. In areas like ours where land is at a premium, boroughs should be given the flexibility to decide the best approach to workspaces of all kinds in order to ensure the most efficient use is made of scarce sites.

We support the continued protection of SIL London-wide given the vital role it plays in supporting the servicing needs of the CAZ.

User:	London Borough of Southwark

The council agrees that local development plans should be used as the basis for making more efficient use of Strategic Industrial Land, and agree that the proposed uses identified in Part C are appropriate for SIL designations. The process of SIL consolidation identified in Part D is unclear. It is suggested that the process of SIL consolidation allows for mixed-use development which retains industrial capacity where brought forward by a plan-led process and coordinated masterplanning.

User:	London Borough of Redbridge

The Council supports this policy and is keen to ensure a diverse local economy, focusing on improving existing employment land to attract new investment. Therefore, increasing the capacity, quality, and density of the borough’s Strategic Industrial Locations (SILs) is a key objective of the Redbridge Local Plan; the essence of which is replicated in policy E5.

User:	London Borough of Havering

Havering supports the focus in the draft London Plan on protecting the most important employment land in **Policy E5 (Strategic Industrial Locations).**

User: London Borough of Wandsworth

Support the need to protect the SIL as the main reservoir of industrial, logistics and related capacity. The Council cautiously welcomes the approach to intensification in the SIL. However, this approach also relies upon boroughs providing a much more detailed review of its industrial areas than has been previously undertaken and are used to, including possible environmental and design considerations, which could prove further resource intensive akin to a full master planning exercise which the boroughs would have to resource. The approach would place further importance on implementation and analysis of current floorspace to ensure a development intensifies the floorspace in accordance with policy to ensure the correct type of floorspace is being developed to meet local and Londonwide needs. The Council suggests that intensification is more suited to Locally Significant Industrial Sites as opposed to the main Strategic Reservoir of the Strategic Industrial Locations. It is noted that table 6.3, includes an expanded SIL area that extends the existing North Wimbledon SIL, across the borough boundary to incorporate Garratt Business Park in this borough, which was previously designated as a LSIA. The added protection that this could bring to this important industrial area is welcomed, but there is concern that a large part of this SIL, contained in the Weir Road Industrial estate is earmarked as a depot for the proposed Crossrail 2. The future loss of that area must not adversely impact on Garratt Business Park.

User:	Suffolk County Council

Policies within the draft London Plan (E5, E7 and E8) refer to the potential of relocating some employment to the Wider South East Region and collaborative working with authorities outside London on this matter. At the Wider South East Summit, the Mayor referred the Royal Opera House's linkage to Thurrock and the Deputy Mayor agreed to joint research on the location of firms. Councils in Suffolk welcome the recognition of the wider economic aspects and that London's policy and evidence base reflects on the office and industrial markets in the Wider South East.

The protection afforded to secondary materials and waste management in policies E4 and E5 is welcome and benefits the vitality of the wider waste supply chain but, in order to link with the safeguarding policy on aggregates (SI10), reference should also be made to aggregates within these policies.

User:	London Borough of Richmond Upon Thames

There are no SILs in LB Richmond upon Thames.

User:	London Borough of Harrow

Harrow supports the removal of two different types of SIL and focusing SIL on industrial uses rather than a combination of industry / offices.

User:	Royal Borough of Greenwich

E5D

Clarification of the phrase ‘or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough’ is needed. This implies that a planning application could seek to release SIL, which would undermine the plan-led approach and the robustness of the borough-level categorisations. As a minimum, what constitutes a ‘masterplanning process’ should be defined. Otherwise this statement conflicts with part B(1) of the policy which is clear that SIL boundaries can only be defined by the Local Plan and these boundaries should be used for decision making.

User:	London Borough of Havering

References to boroughs needing to develop policies to protect and intensify the functions of SILs and including access improvements and digital connectivity are supported. This is required in Rainham but Havering remains reliant on support from the Mayor for resources to enable the planning and regeneration functions.

User:	London Borough of Enfield

Policy E5 ‘Strategic Industrial Locations’ is too rigid and fails to recognise that SIL is not the same across London. There needs to be a level of flexibility involved in the policy, especially in areas earmarked for large scale regeneration. SIL policy should also give room for local authorities to set a vision for the types of industry that they want to attract. Intensification does not imply that uses will be compatible. Policy should allow for the better co-location of uses within Opportunity Area SIL similar to LSIS policy. The agent of change principles will protect industrial uses from incompatible uses coming in.

User: London First

Policy E5 Strategic Industrial Locations (SIL)
We agree that SILs should be proactively managed through the development plan process and the policy's provisions to make more efficient use of land in SILs. Many SILs overlap with OAs and identified growth corridors, including major infrastructure investment projects, such as Crossrail 2 and the Bakerloo Line extension. We do not believe that the intensification of existing uses within SIL will deliver sufficient capacity to meet the wider growth potential of such locations. Policy E5 should enable boroughs to identify new SIL through the development plan process, to enable the release of land within SILs that have significant potential to deliver new housing, within specifically identified OAs and growth corridors.

Part B of the policy should include an additional point (4) which states that:
B Boroughs, in their Development Plans, should:
(4) allocate new industrial sites to provide additional capacity including where this will enable the release of land for housing in defined opportunity areas and growth locations

User: Just Space

Policy E5 Strategic Industrial Locations (SIL)

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

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

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

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

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

Proposed changes

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

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

User:	London Borough of Bexley

The Council agrees that London boroughs should define SIL boundaries, as set out in **Part B** of **Policy E5 Strategic Industrial Locations (SIL)**. This approach is in line with current London Plan policy. It is noted that Bexley's SILs remain the same, as set out in the draft Plan **Table 6.3**. The Council supports the approach to releasing SIL through a strategically co-ordinated process of consolidation.

As noted in paragraph 6.13 above, the Council is concerned about the loss of the distinction between IBP and PIL. Office uses should be allowed in SILs where they are appropriate and as determined locally. **Policy E5** is silent on office uses in SILs, which causes uncertainty over office uses as part of proposed industrial developments. It appears that such proposals are to be refused because office uses are not included in the list of acceptable uses in **Part C of Policy E5**. Greater flexibility is required in this policy.

User:	Federation of Small Businesses

We support this measure.

It should be recognised that multi-storey developments may not deliver or be viable on all SIL sites. Therefore, Boroughs should be given more freedom to manage overall supply as long as there is no net loss and the sites are in the right commercial location.

User:	Federation of Small Businesses

We welcome the proposals to include flexible B1C/B2/B8 premises for occupations by SMEs and small-scale ‘walk-to’ services. We are keen to know where ‘Arches under railway lines’ fall into as a lot of businesses under Network Rail and TfL Control are extremely different properties.

User:	Federation of Small Businesses
This process must be rigorous and fully evidence based.	

User: Federation of Small Businesses

It is vital that the Agent of Change principle continues to be applied after the development has been completed and the premises occupied, to ensure the protections intended by the policy are not relaxed once the developer’s interest in the property has ceased.

Contracts for purchase and rent of residential properties must be written in such a way that residential occupiers cannot claim they were unaware of neighbouring commercial activities to lodge complaints that could impose unreasonable restrictions on their neighbour’s business activities.

User: Kingfisher PLC

Home Improvement stores should be protected in the same way as land for industry, logistics and services [Policy E4; E5]

Kingfisher agrees with the intention to secure sufficient supply of land and premises to meet current and future demands for industrial and related functions to be maintained. Indeed, a significant proportion of our Screwfix trade counters in London (typically B8 sites, serving predominantly trade customers within industrial estates and some Strategic Industrial Locations), fall into this category.

Since 2012, Screwfix has opened 50 new stores across the UK every year, with expansion also included within the capital with an increasing number of outlets located in more central locations (e.g. Fulham and Kensington).

Screwfix also contributes to the Mayor's aspiration to address the Construction Skills Gap in its support for trade apprentices; it is running its Top Trade Apprentice competition for the third consecutive year to support the pipeline in the trade and published a guide in 2016 to encourage trade customers to hire their own apprentices.

Kingfisher supports the draft Plan's inclusion to encourage boroughs to define the detailed boundary of Strategic Industrial Locations in policies maps as it is sometimes difficult to identify whether or not our Screwfix sites fall within or outside of the SIL boundary.

However, it is becoming increasingly difficult for Screwfix to find new B8 sites in London and have opened A1 sites in some locations – which typically have higher rental rates than B8 sites, which makes it more difficult to maximise financial viability.

While it is encouraging to see that businesses serving an industrial purpose are being protected in the Plan, we believe that the approach to out of town retailing is contrary to this approach. **We believe that retailers contributing to these same aims as industrial sites and contributing to other planning priorities such as housing should receive similar protections to industrial sites.**

We believe our B&Q stores have much in common with industrial sites identified for protection. Not only do they directly serve a significant number of trade professionals (who represent around 25% of B&Q's customer base through its 'Trade Point' provision), they also contribute directly to the Mayor's priorities to maintain and repair existing housing infrastructure as well as creating more homes in the capital to serve the needs of London's growing population.

Like industrial sites, B&Q stores also contribute towards employment opportunities for Londoners with more than 1,000 store colleagues within the capital.

We very much hope that you will take these comments into consideration, and make modifications to the policies in the draft London Plan. Please do not hesitate to contact us should you wish to discuss the matters further with us in more detail.

User: SEGRO

Proposed Policy Amendments to Policy E5: B Boroughs, in their Development Plans, should: 3. explore opportunities to intensify and make more efficient use of land in SILs**, and support this through the allocation of sites** in Development Plan reviews and through Opportunity Area Planning Frameworks in collaboration with the GLA and other planning authorities within and outside London (Policy E7 Intensification, colocation and substitution of land for industry, logistics and services to support London's economic function). **4. In Boroughs with Green Belt designations, identify new SILs in line with the locational criteria set out in Part D of Policy E4 Land for industry, logistics and services to support London's economic function following the outcomes of a Green Belt review. Supporting text:** 6.5.3 Innovations to make more effective use of land in SILs are encouraged and should be explored **and proactively supported** in Local Plan reviews and Opportunity Area Planning Frameworks **through the identification and allocation of sites**. This includes **assisting with land assembly and** collaborative working with other planning authorities in the relevant property market areas including authorities in the Wider South East (see also Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function). ***[DELETE: This should take into account the potential to rationalise areas of SIL that are currently in non-industrial and related uses or contain transport or utilities uses which are surplus to requirements.]*** The Thames Gateway provides the greatest scope for strategically co-ordinated plan-led consolidation of SILs in order to manage down overall vacancy rates, particularly in the boroughs of Newham and Barking & Dagenham.

User:	U+I
This policy is unnecessary, causes delay in delivery and is potentially unlawful in the context of section 38(6) for decision-making to be hampered by the inclusion of paragraph D, requiring plan-based framework alterations to be in place rather than allow judgement by members on planning applications the same issues as in plan-making.	

User:	U+I

The current draft London Plan seeks to preserve SILs across the capital for industrial activities alone. We believe there are opportunities to use these creatively to increase housing numbers in the capital through stronger encouragement of co-location of housing above or alongside industrial space. This will lead to more and newer industrial space being financed and created, as well as using the airspace above what would otherwise be low-rise and low-density areas. Just as importantly, such areas can become the new contributors to London’s place-making. Mixed use and active places that people want to go to and are safe at night.

User: Roca Investments

Whilst we note the importance of SIL in supporting strategic logistics operations serving the capital we consider a more site specific localised approach should be applied when determining applications such as residential-led mixed use schemes located within SIL

ROCA have sites that are of low-grade former industrial sites which has little prospect of being redeveloped for a solely employment use or industrial use –these in some cases have Class B1a lawful uses. The character of these sites epitomises the shift in employment space comprising postwar low-scale and low-grade industrial buildings which have shifted away from traditional industry towards the arts, small scale B1 uses.

We consider that adopting a strategic plan-led approach to SIL release does not take into account the specific characteristics in relation to the ever evolving character of industrial/ commercial areas, shifts in the market, the constant strive to create mixed-use sustainable locations and the characteristics of the existing buildings and structures on the site. As such, whilst we appreciate a need to retain industrial floorspace, we consider this restrictive approach to SIL designation is counterproductive to the strategic aspirations of the London Plan and the local aspirations of the Boroughs, particularly where sites are clearly redundant or can deliver more appropriate employment, intensive and housing opportunities as part of co-location mixed use schemes.

User: Notting Hill Housing Trust

In line with our comments on Policy E4 Land for industry, logistics and services to support London's economic function NHH supports London-based industrial and logistical functions. To reiterate our response to Policy H1 Increasing housing supply, NHHT also recognise and welcome the increased London annual housing target to 64,935 homes.

As well as encouraging the sensible release of green-belt land, NHHT would also support the release of land within Strategic Industrial Locations (SIL) in order to achieve the London –wide annual housing completion target. NHHT are of the view that the sensible release of SIL should only be encouraged where there is a co-ordinated consolidation of SIL. NHHT supports the analysis of SIL's to establish areas which are surplus to requirements or potential to rationalise either in elsewhere in London or in other areas such as growth corridors. NHHT agree that SIL land should only be released where it is clear that the land is vacant, under used, not fit for purpose and/or and where the potential for residential development and the delivery of affordable housing can be maximised.

User: Chartered Institute of Architectural Technologists

Economy

Policies E1 to E11

We are in agreement with the proposals contained in the plan.

User: London Riverside BID

Policy E5 – Strategic Industrial Locations

We welcome the continued recognition of SIL as the main reservoir of industrial and logistics land in London and that SILs should be managed by boroughs through the plan-led process. We agree that boroughs are best placed to manage this.

Whilst we welcome the encouragement of innovation through co-location and intensification of SILs to manage land release particularly within OAs, it should be recognised that multistorey development may not be deliverable or viable on all SIL sites. Boroughs may wish to manage the overall supply of land in SILs, ensuring no net loss through the allocation of new sites through the development plan process. As per our comments on policy E4, the plan should encourage and enable this. Policy E5 and paragraph 6.5.3 should be amended accordingly.

This policy however, does not recognise the need for continued investment in strategic infrastructures including power, water, digital connectivity and transport to support the continued success and growth of SILs.

User:	British Property Federation

We fully support the Mayor’s policy on Strategic Industrial Locations. We would however add that the Mayor needs to take into account the dramatic uplift in the number of new homes needed to be built in London as set out not only in the draft LP but the higher number in the recent MHCLG consultation *Planning for the right homes in the right places.* If the national consultation proposals are enforced, it would mean a huge increase in the amount of homes needed to be planned for within London, as such the Mayor needs to take account of the increased need for industrial space as each new home will create a need for distribution services located within easy reach of industrial land.

User: GLA Industrial BIDs Group

Policy E5 – Strategic Industrial Locations

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Whilst we welcome the encouragement of innovation through co-location and intensification of SILs to manage land release particularly within OAs, it should be recognised that multistorey development may not be deliverable or viable on all SIL sites. Boroughs may wish to manage the overall supply of land in SILs, ensuring no net loss through the allocation of new sites through the development plan process. As per our comments on policy E4, the plan should encourage and enable this. Policy E5 and paragraph 6.5.3 should be amended accordingly.

This policy however, does not recognise the need for continued investment in strategic infrastructures including power, water, digital connectivity and transport to support the continued success and growth of SILs.

User: East of England Local Government Association

Authorities are also concerned that the processes from redevelopment of industrial land would be ad hoc and welcome the commitment in the London Plan for a strategically co-ordinated process that focuses on intensification as well as the potential for substitution outside London where there is local agreement (policy E7).

The three boroughs identified for limited release of industrial land and floor space are boroughs within the Thames Gateway that link to authorities within the East. The limited release is based on these areas having relatively low values and high vacancy rates. Notwithstanding the general supportive position of the economy policies in the draft London Plan, such as the aim for no net loss of industrial land uses, the application of the intensification approach needs to be applied within these areas. London's industrial study highlighted that two of the three areas assigned for limited release (Havering and Barking & Dagenham) actually saw net increases in floor space between 2001-2016. The report also notes that "there are some signs that occupiers and developers who would previously only consider west London locations are now looking to the east" (CAG, London Industrial Land Demand, page 213). These factors indicate that pursuing of intensification in these areas is a

justified approach and the interaction between the proposed polices could be clearer in this regard.

The protection afforded to secondary materials and waste management in the policies (E4 and E5) is welcome and benefits the vitality of the wider waste supply chain but, so to link with the safeguarding policy on aggregates (SI10), reference could also be made to aggregates within the economic policies.

User: East of England Local Government Association

Policies within the draft London Plan (E5, E7 and E8) refer to the potential of relocating some employment to the WSE and collaborative working with authorities outside London on this matter. At the Wider South East Summit, the Mayor referred the Royal Opera House's linkage to Thurrock and the Deputy Mayor agreed to joint research on the location of firms. Councils in the East welcome the recognition of the wider economic aspects and that London's policy and evidence base reflects on the office and industrial markets in the Wider South East.

Representatives of the GLA have also previously expressed an interest in moving jobs into the WSE. There would be a mutual benefit to London and East of England residents if our economic prospects were aligned so that more jobs were created and, if necessary, moved from London particularly if people were enabled to live and work locally – thereby easing pressure off London's already strained transport network and housing. It would be helpful if as part of the London Plan, the Mayor of London set out *activities* related to aligning economic development opportunities across the WSE alongside local authorities and Local Enterprise partnerships. This would enable willing partners to better identify opportunities for collaborating with London and help develop a more sustainable approach to managing growth in London and the WSE as a whole.

There is scope for further collaboration surrounding the economic linkages. The LSE's migration review noted that, the economic interconnections have "matured to a stage where almost all of it is integrated in one economic agglomeration" (LSE, Review of Research on Migration Influences and Implications for Population Dynamics in the Wider South East, page 23). The economic development activities such as the Tech Nation 2017 Survey, TechCity and MedCity are not just relevant to London but can be linked to supply-chains and sectoral linkages throughout the WSE. The emphasis on linkages through academic research institutes in Oxford and Cambridge through MedCity is a clear example and authorities in the East are interested in exploring other economic linkages further. The draft London Plan contains supportive policies to restrict the permitted development rights on conversion of office to residential.

Many towns outside of London have also lost office space under existing permitted development rights and face difficulty attracting replacement businesses. Businesses do not necessarily consider opportunities beyond London's boundary and may need a nudge to encourage them to invest in areas outside of London. High quality employers are key to sustainable local growth and there would be a mutual benefit to London and councils areas in the East if more jobs were created outside of London so that more residents were able to live and work locally – thereby easing pressure off London and the region's already strained transport network and housing.

It is noted in Policy E8 that the Mayor of London has identified a number of sector-specific opportunities and challenges and these sectors are also addressed in the Mayor’s draft Economic Development Strategy for London. The East of England considers that additional wording should be included in the supporting text to this policy to recognise the mutual benefits of the Mayor working with the Wider South East authorities to maximise growth of these sectors through collaborative working on the location of key clusters and hubs, development of ancillary/spin–off industries, and provision of supporting infrastructure and skill and training.

User: Amazon UK Services Limited

Policy E5 – Strategic Industrial Locations (SIL)

Amazon is concerned that reference to ‘intensification’ is also included within policy E5. This would seem to imply the application of the 65% default plot ratio referred to by draft policy E4. For the reasons explained in relation to policy E4 this is inappropriate. The policy should be subject to flexibility which duly recognises the merits of different types of logistics operations.

Amazon suggest the following wording be added to Part B of Policy E5:

“4) ***Policies which promote the intensification of the function of SILs should incorporate sufficient flexibility to ensure that the particular characteristics and operational requirements of different types of industrial and warehouse businesses are fully recognised.****” [underlined text is Amazon proposed amendment]*

User: Amazon UK Services Limited

In summary, Amazon is concerned that the draft London Plan places too much emphasis on achieving intensification of industrial land capacity through increased plot ratios (the default being set at 65%), with little regard to the practicalities of achieving this or indeed the need to provide for a range of logistic facilities. Such facilities have different and specific requirements in terms of servicing arrangements which in turn affect plot ratios.

Greater flexibility needs to be included within policies E4 and E5 to recognise the merits of particular logistics proposals. Furthermore, greater recognition needs to be given to the fact that despite logistic facilities not achieving the suggested default plot ratio they can nevertheless be significant generators of employment.

In addition to the above the plan should to consider the need to provide a supportive framework to related aspects of the logistics network, including positive encouragement for uses which would support multi-channel retailing in town centres. The changes to the GPDO have gone some way to improving the flexibility in terms of evolving town centres, however, there remains a need to ensure that town centre policies embrace changing consumption practices and are not based on out-dated assumptions about the way people purchase goods.

Amazon would welcome the opportunity to discuss these representations with GLA officers and would be happy to provide some example case studies or arrange a tour of example buildings. In the meantime, should you require clarification on any of the matters raised, then please do not hesitate to contact us.

User: Crest Nicholson PLC

We consider this Policy to be unsound as currently drafted and amendments are required.

Whilst Crest Nicholson recognises the importance of maintaining SIL and LSIS Policy E5D should be adjusted to make it clear that where residential uses can be introduced into these area without adverse effect on the operation of the industrial uses that this may be permitted. There are many examples of industrial uses and residential uses sitting side by side and indeed vertically stacked within one building where the uses can successfully co-locate for example Kings Cross has a Travis Perkins trade counter located below residential units. The policy as drafted does not allow for this type of proposal to be brought forward and assessed by local planning authorities. We suggest the policy be amended so that in E5D the first sentence allow two exceptions, the first as drafted in the policy and the second to read along the following lines:

“ or where the relevant borough is satisfied that introduction of a non-industrial use into a part of a SIL will comply with the requirements of Policy E5E.”

User: 313-349 Ilderton Road LLP

Policy E5 Strategic Industrial Locations (SIL) sets out Strategic Industrial Locations (identified in Figure 6.2 and Table 6.3) should be managed proactively through a plan-led process to sustain them as London's main reservoirs of industrial, logistics and related capacity for uses that support the functioning of London's economy. Development proposals in SILs should be supported where the uses proposed fall within the broad industrial-type activities set out below:

1. light industrial (Use Class B1c);
2. general industrial uses (Use Class B2);
3. storage and logistics/distribution uses (Use Class B8);
4. other industrial-type functions, services and activities not falling within the above Use Classes including secondary materials and waste management, utilities infrastructure, land for transport and wholesale markets;
5. flexible B1c/B2/B8 premises suitable for occupation by SMEs;
6. small-scale 'walk to' services for industrial occupiers such as workplace crèches or cafés.

Development proposals for uses in SILs other than those set out above, (including residential development, retail, places of worship, leisure and assembly uses), should be refused except in areas released through a strategically co-ordinated process of SIL consolidation. This release must be carried out through a planning framework or Development Plan document review process and adopted as policy in a Development Plan or as part of a co-ordinated master-planning process in collaboration with the GLA and relevant borough.

User: Catalyst Housing Limited

SIL

Draft Policy E4 relates to land for industry, logistics and services. Amongst other things, it sets out the three categories, being SIL, LSIS and non-designated Industrial Sites. Part C states that in overall terms across London there should be no net loss of industrial floorspace capacity within designated SIL and LSIS. It states that the release of industrial land should be facilitated through the processes of industrial intensification, co-location and substitution. The supporting text explains the 'provide capacity', 'retain' and 'limited release' categories. Only three Boroughs fall within the limited release category, all within the Thames Gateway.

Draft Policy E5 relates to SIL. Part D presumes against uses not listed in the policy (including residential) except in areas released through a strategically co-ordinated process of SIL consolidation – to be carried out through a planning framework or Development Plan document.

It is possible that the 'provide capacity', 'retain' and 'limited release' categories pertaining to each of the Boroughs may change over the life of the Plan, particularly as technology is advancing rapidly. We therefore think some provision should be introduced to the policy to enable the Mayor, in consultation with the relevant Borough(s), to release SIL without needing to go through a plan-led process. It would still be for the Mayor to judge whether release is acceptable on a site by site basis, but the flexibility could enable an appropriate site to come forward more swiftly for alternative uses.

Similar flexibility should be introduced within draft Policy E7. Provision should be made for alternative uses to be considered through a planning application-led approach, not just through the Local Plan and/or through a co-ordinated masterplanning process.

User:	Benhill Residents

Given that the result of huge loss of industrial land in London has negatively impacted on communities living in social housing, we would like to see protection and support of existing / remaining. While it is suggested that in industrial land rate vacancies are above the London average in the Thames Gateway, we feel that these should still be retained. There are other parts of London where there is a lack of industrial land space. There should be a co-ordinated London-wide approach to dealing with this – rather than handing more land over in the Thames Gateway for high-end business sectors.

User: King’s College Hospital NHS Foundation Trust

Draft Policies E5 – Strategic Industrial Locations and E6 - Locally Significant Industrial Sites, (Chapter 6 Economy)

Parts of the KCH Estates are located within Strategic Industrial Locations (SILs) and Locally Significant Industrial Location (LSIS). Thus, we have carefully considered the wordings of related draft policies of in order to safeguard future development potential at KCH, as this would likely have an
effect on public health care services.

We propose an additional section to part C of Policy E5 (outlined and named part C7) which will allow flexibility for research and development for health related uses to encourage investment from MedTech and Pharmaceutical Organisations.

Development proposals in SILs should be supported where the uses proposed fall within the board industrial-type activities set out below:
Part C7 of Policy E5: *“allowing flexibility for research and development for health related uses.”*

User: London Industrial and Logistics Sounding Board

Policy E5 – Strategic Industrial Locations
We welcome the continued recognition of SIL as the main reservoir of industrial and logistics land in London and that SILs should be managed by boroughs through the plan-led process. We agree that boroughs are best placed to manage this.

Whilst we welcome the encouragement of innovation through co-location and intensification of SILs to manage land release particularly within OAs, it should be recognised that intensification may not be deliverable or viable on all SIL sites. Boroughs must carefully manage the overall supply of land in and around SILs, ensuring no net loss through the allocation of new sites – including those currently used for non-industrial uses – through the development plan process. As per our comments on policy E4, the plan should encourage and enable this. Policy E5 and paragraph 6.5.3 should be amended accordingly.

This policy however, does not recognise the need for continued investment in strategic infrastructures including power, water, digital connectivity and transport to support the continued success and growth of SILs. The policy should also recognise the important role SILs play in supporting London’s night time economy.

User: New Policy Institute

Add to end of A.

Most SILs are likely to continue to have a high proportion of low-income Londoners living nearby. In managing SILs to meet the goal set for them, the interests of nearby low-income areas should be fully taken into account.

Add new paragraph after B(1):

Also define a boundary for the wider “SIL and its immediate vicinity”, taking guidance from the Mayor and relevant Supplementary Planning Guidance as an area where priority will be given to improving social and environmental facilities for existing residents who are impacted by the SIL.

Add new paragraph B(4):
4. ensure that the SIL and its immediate vicinity has sufficient provision of public services, green and social infrastructure and affordable housing, using the current facilities and uses made of the area as a minimum standard against which future plans are measured.

In C(6) replace
such as
with
including, but not limited to

There is an affinity between SILs (figure 6.2) and local areas with high concentration of low-income households (LPP figure 3.11). For a variety of reasons (where the jobs are located; the relative unattractiveness of living in or near a SIL) this will remain so. SIL development should pay explicit attention to the needs and choices of current residents (in/near SIL).

User: Here East

Site allocation – Here East

In the adopted London Plan (2016), Here East falls within the ‘Hackney Wick (part)’ ‘Strategic Industrial Location (SIL) (Industrial Business Park (IBP)). This is considered to sufficiently reflect the uses and objectives of Here East.

The IBP aspect of the allocation has been omitted from the new draft London Plan, leaving just the SIL allocation.

The new draft London Plan describes SILs as being suitable for broad industrial-type activities, and lists the following uses:

“1) light industrial (Use Class B1c)

2) general industrial uses (Use Class B2)

3) storage and logistics/distribution uses (Use Class B8)

4) other industrial-type functions, services and activities not falling within the above Use Classes including secondary materials and waste management, utilities infrastructure, land for transport and wholesale markets

5) flexible B1c/B2/B8 premises suitable for occupation by SMEs

6) small-scale ‘walk to’ services for industrial occupiers such as workplace crèches or cafés”

With the above definition in mind, Here East no longer consider the Hackney Wick SIL allocation as suitable for the uses and activities at Here East. Consideration should therefore be given to an alternative, employment allocation which will more accurately reflect the mix of uses and the objectives of Here East. Given that the detailed boundaries of SILs are determined by boroughs in their Development Plans, any changes here will need to be reflected in the forthcoming new LLDC Local Plan.

It is recognised that the draft London Plan introduces Creative Enterprise Zones (CEZ). These are a positive addition which support the role which creative industries have in contributing to London’s economy and its cultural offer.

Here East provides workspace for a range of creative businesses which sit alongside office space for a mixture of start-ups and corporates. Here East also includes provision for managed and affordable workspace within this mix of uses. It may therefore be that a CEZ allocation is more appropriate for Here East than the SIL allocation in the draft new London Plan.

As a new designation, Here East reserves its position to continue discussions with LLDC PPDT and the Greater London Authority (GLA) regarding the objectives and role of the CEZ. These discussions would coincide with, and contribute to, LLDC’s review of their Local Plan. Here East understands the intention of LLDC to develop a CEZ for Hackney Wick and Fish Island, which it provides in principle support for.

User: Here East

Site allocation – Here East

In the adopted London Plan (2016), Here East falls within the ‘Hackney Wick (part)’ ‘Strategic Industrial Location (SIL) (Industrial Business Park (IBP)). This is considered to sufficiently reflect the uses and objectives of Here East.

The IBP aspect of the allocation has been omitted from the new draft London Plan, leaving just the SIL allocation.

The new draft London Plan describes SILs as being suitable for broad industrial-type activities, and lists the following uses:

“1) light industrial (Use Class B1c)

2) general industrial uses (Use Class B2)

3) storage and logistics/distribution uses (Use Class B8)

4) other industrial-type functions, services and activities not falling within the above Use Classes including secondary materials and waste management, utilities infrastructure, land for transport and wholesale markets

5) flexible B1c/B2/B8 premises suitable for occupation by SMEs

6) small-scale ‘walk to’ services for industrial occupiers such as workplace crèches or cafés”

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As a new designation, Here East reserves its position to continue discussions with LLDC PPDT and the Greater London Authority (GLA) regarding the objectives and role of the CEZ. These discussions would coincide with, and contribute to, LLDC’s review of their Local Plan. Here East understands the intention of LLDC to develop a CEZ for Hackney Wick and Fish Island, which it provides in principle support for.

User: Vital OKR

A

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

(The main reservoir phrase is a residue from the days of advocating release of much of the non?SIL industrial land. The phrase is now absurd as SIL is only 50% of the total, and surely if nil release is the policy then its all the main reservoir, not just half of it)

B
Boroughs, in their Development Plans, should:

1.Define the detailed boundary of SILs in policies maps having regard to the scope for intensification, co?location and substitution (set out in Policy E7 Intensification, co?location and substitution of land for industry, logistics and services to support London's economic function), and use the adopted Local Plan SIL boundary as the basis for decision?making

2.Develop local policies to protect and intensify the function of SILs and enhance their attractiveness and competitiveness (including access improvements and digital connectivity) for the functions set out in part C

3. Explore opportunities to intensify and make more efficient use of land in SILs in Development Plan reviews and through Opportunity Area Planning Frameworks in collaboration with the GLA and other planning authorities within and outside London (Policy E7 Intensification, co?location and substitution of land for industry, logistics and services to support London's economic function).

C
Development proposals in SILs should be supported where the uses proposed fall within the broad industrial?type activities set out below:
1. Light industrial (Use Class B1c)
2. General industrial uses (Use Class B2)
3. Storage and logistics/distribution uses (Use Class B8)
4. Other industrial?type functions, services and activities not falling within the above Use Classes including secondary materials and waste management, utilities infrastructure, land for transport and wholesale markets
5. Flexible B1c/B2/B8 premises suitable for occupation by SMEs
6. Small?scale 'walk to' services for industrial occupiers such as workplace crèches or cafés.

D
Development proposals for uses in SILs other than those set out in part C above, (including residential development, retail, places of worship, leisure and assembly uses), should be refused except in areas released through a strategically co?ordinated process of SIL consolidation. This release must be carried out through a planning framework or Development Plan document review process and adopted as policy in a Development Plan ~~or as part of a co?ordinated masterplanning process in collaboration with the GLA and relevant borough~~.
(Coordinated masterplanning processes if not integral to Development Plans are a route to unfair planning, frequently taken forward in violation of Gunning principles that define fair consultation, this should not be promoted by the London Plan)

E

Development proposals within or adjacent to SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial?type activities and their ability to operate on a 24?hour basis. In line with Agent of Change principles (Policy D12 Agent of Change) residential development adjacent to SILs should be designed to ensure that the industrial activities are not compromised or curtailed. Particular attention should be given to layouts, access, orientation, servicing, public realm, air quality, soundproofing and other design mitigation in the residential development.

User: Vital OKR

London’s SILs, listed in Table 6.3 and illustrated in Figure 6.2, are the capital’s largest concentrations ~~main reservoir~~ of land for industrial, logistics and related uses. SILs are given strategic protection because they are critical to the effective functioning of London’s economy, and because they have the greatest scope for industrial intensification. They can accommodate activities which ? by virtue of their scale, noise, odours, dust, emissions, hours of operation and/or vehicular movements ? can raise tensions with other land uses and particularly residential development.

(The most ready scope for intensification now becomes a key reason to distinguish SIL from the rest of the reservoir)

User: Vital OKR

SILs are important in supporting strategic logistics operations serving the capital as well as providing relatively lowcost industrial space for SMEs. Typically, they are located close to the strategic road network and many are also well?located with respect to rail, river, canals and safeguarded wharves which can support the sustainable movement of goods, construction materials and waste to, from and within London. To ensure that London can retain an efficient logistics function it is particularly important to secure and enhance strategic provision in SILs in west London, especially at Park Royal and around Heathrow; in north London in the Upper Lee Valley; in east London, north and south of the Thames; and in the Wandle Valley in south London. This should be complemented by smaller?scale provision in LSIS, Non?Designated Industrial Sites, and mixed?use developments elsewhere, including sustainable ‘last mile’ distribution close to central London.

(There is now a call for industrial accommodation in locations where it is currently isn’t present, in mixed developments, so this should be referenced where relevant)

User:	Here East

Here East does not reflect the new SIL definition, meaning its allocation should be amended to ensure it reflects the provision on site. Reference should be made to the removal of the IBP type of SIL allocation, and there should be a requirement that Local Planning Authorities review designations to ensure that they remain appropriate.

User:	London Borough of Newham

Policy E5 Strategic Industrial Locations

LBN are generally supportive of the policy which is complementary to Newham's Draft Revised Local Plan particularly the reference to a plan-led approach (E5.A) Agent of Change policy E5.E/D12) to ensure industrial activities are not compromised through new development.

User:	London Borough of Sutton

OBJECT - UNSOUND - NOT EFFECTIVE. The London Borough of Sutton does not support Policy E5 in respect of its support for storage and logistics/distribution centres within the Greater London boundary. These uses take up large footprints with few employees and are wasteful in terms of employment density and damaging in terms of their effect on the road network. Given that the Mayor is concerned about the loss of employment land and advocates the intensification of employment land in Policy E4, it is strange that such uses are promoted through Policy E5, and this would also appear inconsistent with Policy E7. The council contends that the policy should be more precise to clarify that the Mayor supports “final-mile distribution centres”, which are an unavoidable use, but does not support the land-hungry, high transport volume uses of regional or national distribution centres within the boundaries of Greater London.

User: Chartered Institute of Logistics & Transport

We also welcome Policy E5 on Strategic Industrial Locations (SIL's) and in particular those parts of the policy that relate to transport and logistics facilities. However, we suggest that the policy should go further and recognise that land along the river and along the main rail routes into London is a precious commodity and that, where it is - or can be - linked to the strategic road network for onward distribution, there should be a presumption in favour of transport and logistics use. This could be added to policy E5 C. By definition, modal transfer from these low-carbon modes to (electrically-powered) road vehicles for final delivery can only take place along the key water and rail arteries. While intensification is not always possible, the air space above an intermodal terminal can be used for other purposes and thus the footprint need not be 'sterilised' - this principle is already in use in France, with a recently-commissioned modal transfer facility in Paris, and is fully consistent with the Intensification proposal in Policy E7. Within London, the air space above a rail-fed concrete plant at Westbourne Park is largely occupied by a TfL bus garage and we believe there is considerable scope to create further such applications along the main rail corridors into London. CILT welcomes the associated GLA paper Industrial Intensification Primer demonstrating GLA’s intentions towards multi-storey logistics and mixed residential and industrial developments with a number of examples of successful schemes abroad.

User: Dagenham Dock Limited

Draft Policy E5 – Strategic Industrial Locations (SIL)

Table 6.2 of the draft London Plan defines Barking and Dagenham as a borough where limited release of industrial land is acceptable. The purpose of Figure 6.2 and Table 6.3 is to define London's SILs. However, the diagram at Figure 6.2 is unclear, with no further definition or refinement provided within Table 6.3. In the case of DDL's commercial asset, it is assumed that the Dagenham Dock site falls outside of the SIL ref. 32 'Dagenham Dock / Rainham Employment Area' as it is located north of the A13 and previously defined as LSIL in the London Borough of Barking and Dagenham Core Strategy (2010). DDL therefore request that on the final publication of the new London Plan, the document is supported by more detailed maps which clearly define the extent and boundaries of London's SILs. This will remove any future ambiguity and uncertainty regarding strategically defined land uses.

User: Aitch Group

My client does not support the Mayors approach to Strategic Industrial Locations which is confusing. On the one hand the draft New London Plan recognises certain locations as areas of change, such as the Old Kent Road, that will deliver a mixture of employment space and other uses including residential.

The Mayor ought to make a clear distinction between the areas that are to remain as traditional Strategic Industrial Locations and those that are considered suitable to provide more mixed neighbourhoods such as the Old Kent Road.

User: London Borough of Ealing

Strategic Industrial Locations
(E5)

The provisions of this policy are broadly supported as development management tools, and as principles for the management of SILs. In particular we welcome clarification of the permitted use types and the encouragement of a strategic approach to management.
We would however question whether this approach is sufficient to drive the intensification of these sites particularly where they are in fragmented use and ownership.

Strategic Industrial Locations
(E5 D)

The policy as a whole needs to be strengthened in relation to the management of extant non-conforming uses and some aspects of consolidation that are currently covered in Policy E7. The Council has long experience of defending appeals against SIL policy and these often hinge on the status of SIL as a 'land-based' policy which preserves the industrial potential of a large consolidated area of land. This risks being inadvertently undermined by the shift to a floorspace-based system of monitoring and by the lack of wording supporting increasing consolidation of these sites as a whole. It is suggested that this could be addressed in clause D by including wording such as:
'These industrial-type uses are always to be preferred for development within SILs and the presence of extant non-conforming uses does not reduce the need for a given site to provide industrial capacity. Development activity should always seek to reinforce the integrity of the SIL as a whole and to return sites with non-conforming uses to those uses set out in part C.'

User:	Enterprise M3 Local Enterprise Partnership (LEP)

Chapter 6 - Economic Development

We note that there are multiple sites identified around Heathrow which may impact on the Enterprise M3 area within **Policy E5 Strategic Industrial Locations (SIL)** and that there is a significant amount of industrial and logistics capacity serving London that is located outside of the capital under **Policy E7**. The policy states that there may be scope for some substitution of London's industrial capacity to locations in the wider region where this results in mutual advantage, such as complementary business opportunities and transport infrastructure improvements. Whilst we would welcome this approach in principle we would seek to ensure that, as stated previously, there is a meaningful mechanism for this cooperation through joined up economic development policies between London and our area.

User: Lidl UK GmbH

Lidl acknowledges that the SILs across London are particularly important to the functioning of London’s economy. It is therefore correct that they should attract the highest level of protection in the new London Plan.

However, SILs have the potential to change over time and, as a consequence, Lidl supports the principle of Part D of proposed Policy E5 which allows for proposals for alternative land uses to be approved in certain circumstances. This should include a criteria based approach including demand assessments to ensure that former industrial sites/premises are not unrealistically safeguarded when market signals suggest otherwise.

In addition, Lidl also considers that Part C(6) should be expanded to include shops and services which are related to the needs of local employees.

User: Peabody

1. Most of the land across Thamesmead that is designated as SIL is within Peabody's ownership. This means we are well positioned to either proactively manage the strategic release of industrial land for new, high quality mixed use development or, if required, offset net loss of SIL floorspace through re-provision across our wider portfolio.
2. Much of Thamesmead's current industrial floorspace provision is relatively low quality, reflecting Thamesmead's current role as a base for low value industrial, storage and distribution uses and waste/utilities. This is associated with the dominance of 'bad neighbour' uses, which do not create an encouraging perception from a residential or commercial perspective.
3. Areas with significant amounts of land designated as SIL are frequently those which the Draft Plan designates as Opportunity Areas or Strategic Areas for Regeneration (Policy SD10). Policy SD10 states that "Development Plans, Opportunity Area Planning Frameworks and development proposals should contribute to regeneration by tackling spatial inequalities and the environmental, economic and social barriers that affect the lives of people in the area, especially in Strategic and Local Areas for Regeneration."
4. However, the Draft Plan's current policy towards SIL does little to support holistic, whole placed approaches to regeneration. In Thamesmead the delivery of designated Housing Zone sites capable of providing significant numbers of new homes – many affordable – is being delayed due to challenges with inflexible approaches to the application of SIL policy stemming from the Draft Plan's policy. There will need to be nuance and pragmatism in the application of SIL policy if areas such as Thamesmead are to attract innovative, higher value industrial uses to facilitate job creation and progression to more valuable jobs. Innovative design solutions addressing the co-location of residential and industrial uses are emerging yet any application to test their success is prohibited by current policy.
5. A more nuanced, context-specific conversation is needed around SIL designations, their purpose and usage. We would suggest that the Thamesmead OAPF process presents an exemplary opportunity to assess the release of SIL across Thamesmead, given that it entails developing a strategic, evidence based framework for development across Thamesmead and includes all major stakeholders.

User:	Natural England

Some of the SIL are close to sites of high environmental value including Lee Valley, and Wandle Valley Regional Parks. Environmental considerations should be enshrined in the development and operation of the SILs.

User:	Member of Parliament James Brokenshire

- The prohibition on no net reduction in Strategic Industrial Land risks preventing the development of brownfield industrial land. This has the potential to undermine the delivery of significant housing development and significant regeneration schemes. I believe this rigid approach is mistaken and rather than being so prescriptive the Plan should allow local councils greater flexibility to take account of local circumstances.

User: DPDgroup UK Ltd

Policies E5 & E6 - Strategic Industrial Locations and Locally Significant Industrial Site

DPDgroup UK Ltd Response to the Draft London Plan Consultation | 6 |

DPD supports the protection of strategic land locations around London but is concerned at the lack of coverage in central London. All of the locations detailed require significant stem mileage to get into the city centre. This will increase vehicles on the road and move the externality to another area rather than addressing it directly.

The Boroughs of London need to protect B8 spaces to support neighbouring residential redevelopment through the planning process. It is natural that developers will bring industrial sites forward for residential redevelopment as the profitability of these sites is far in excess of industrial land. It is the role of the public sector to ensure B8 space is legally protected.

To meet consumer demand, DPD believes that well managed CEP operations should be considered as part of residential developments. By working with the CEP sector, this can be achieved without impacting upon the residents quality of life. Paris has best practice examples of a school and residential areas being located above a final mile delivery depot.

User: Dr Jessica Ferm

1. **Policy E5** on Strategic Industrial Locations (SIL):

should be much stronger in seeking to retain SIL wherever possible. In previous iterations of the London Plan, and in the 2012 SPG, this was clearer, but now it appears that London boroughs are being encouraged proactively to identify the scope for intensification/co-location etc in defining their SIL boundaries. This opens the door for huge loss of SIL. Some industrial land does need to be protected from residential encroachment, purely for operational purposes. Is this not SIL's role and the purpose of its differentiation from LSIS and non-designated industrial sites? As it is written, the Plan simply reads as all industrial land is potentially up for grabs (which weakens the ambition of nil net loss).

has been tightened to exclude non-industrial uses (including retail, places of worship, leisure and assembly uses), with no assessment on the impact on these other uses. The purpose of the tightening of SIL uses in order to increase capacity for industrial to meet demand moving forward is sound. However, it appears that again the driver for this is accommodating as much new residential as possible. There is no consideration given to the overall crisis of accommodation across London for a variety of non-residential uses, where to date SIL and other industrial land has provided relatively affordable and accessible accommodation. Has this been subject to an equalities impact assessment? (the impact on places of worship serving diverse ethnic and religious groups is likely to be notable).

User: Aggregate Industries UK Ltd

Draft Policy E5, Strategic Industrial Land

Draft Policy E5, is supported, subject to some minor amendment and additions so that it is consistent with other provisions in the draft London Plan and the NPPF.

Part E to be expanded to ensure that adequate protection is applied not only to on-site industrial operations, but also along access routes so that vehicular movements essential to industrial/logistical operations are not compromised by new developments.

"E Development proposals within or adjacent to SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial-type activities and their ability to operate on a 24-hour basis. In line with Agent of Change principles (Policy D12 Agent of Change) residential development adjacent to SILs or along key access routes to them should be designed to ensure that the industrial activities are not compromised or curtailed. Particular attention should be given to layouts, access, orientation, servicing, public realm, air quality, soundproofing and other design mitigation in the residential development."

User: Ashia Centur Limited

Draft Policy E5 – Strategic Industrial Locations

The draft policy confirms that SILs (identified in Figure 6.2 and Table 6.3 in the draft Plan) should be managed proactively through a plan-led process to sustain them as London's main reservoirs of industrial, logistics and related capacity for uses that support the functioning of London's economy.

The site, in this instance, falls within the Park Royal SIL identified in Table 6.3. We note in part (B) (3) that the draft policy states that Boroughs should, through their Development Plans explore:

'*opportunities to intensify and make more efficient use of land in SILs in Development Plan reviews and through Opportunity Area Planning Frameworks in collaboration with the GLA and other planning authorities within and outside London (Policy E7 Intensification, colocation and substitution of land for industry, logistics and services to support London's economic function)*'.

With regards to the wording above our client is broadly supportive. However, we suggest that further flexibility is introduced into the wording to support the colocation of uses and the substitution of SIL land. Our suggested wording for part (B) (3) reads as follows:

"explore opportunities to intensify sites, ***and/or collocate uses, and/or substitute land to make more efficient use of land in SILs*** *in Development Plan reviews and through Opportunity Area Planning Frameworks in collaboration with the GLA and other planning authorities within and outside London (Policy E7 Intensification, colocation and substitution of land for industry, logistics and services to support London's economic function)".*

Part (C) of the policy states that development proposals in SIL should be supported where the uses fall within 'broad industrial-type activities', these are defined as:

'1) light industrial (Use Class B1c)

2) general industrial uses (Use Class B2)

3) storage and logistics/distribution uses (Use Class B8)

4) other industrial-type functions, services and activities not falling within the above Use Classes including secondary materials and waste management, utilities infrastructure, land for transport and wholesale markets

5) flexible B1c/B2/B8 premises suitable for occupation by SMEs

6) small-scale 'walk to' services for industrial occupiers such as workplace crèches or cafés.'

Draft policy E5 Part (D) identifies when SIL land could be released and states:

'*Development proposals for uses in SILs other than those set out in part C above, (including residential development, retail, places of worship, leisure and assembly uses), should be refused except in areas released through a strategically co-ordinated process of SIL consolidation.*

This release must be carried out through a planning framework or Development Plan document review process and adopted as policy in a Development Plan or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough.'

In our view, the wording of the first paragraph of part (D) is too narrow and restrictive. This should be revised to introduce greater flexibility for the release of SIL land. Firstly, for land which already benefits from planning permission involving, non-industrial type activities such as our client's site, further consideration should be given to ensure the delivery of implemented schemes are not hindered by this draft policy. Currently, the uses described directly conflicts with our client's consented and implemented permission for mixed use redevelopment. Secondly, the current wording restricts release of land only through SIL consolidation. Further detail should be provided as to what constitutes consolidation specifically for this policy or a more explicit connection made with the details set within Policy E5 part (B).

Our client is broadly supportive of the second paragraph and particularly welcomes the principle of the release of land as part of a co-ordinated masterplanning process with the GLA and in this instance OPDC.

User: Ashia Centur Limited

Draft Policy E5

? Through introducing greater flexibility should be introduced into the wording of draft Policy E5 as it is currently too narrow. Further flexibility in the wording should support the colocation of uses, the substitution of SIL land and ultimate release.

? For SIL land which already benefits from planning permission involving, non-industrial type activities, further consideration should be given to ensure the delivery of implemented schemes are not hindered by this policy.

? Providing greater detail as to what constitutes consolidation specifically for this policy, or a more explicit connection should be made with the details set within draft Policy E5 part (B).

User: Mr Gary Hayes

Policy E4 Land for industry, logistics and services to support London’s economic function and Policy E5 Strategic Industrial Locations and Locally Significant Industrial Sites

Given that the result of huge loss of industrial land in London has negatively impacted on communities living in social housing, we would like to see protection and support of existing / remaining. While it is suggested that in industrial land rate vacancies are above the London average in the Thames Gateway, we feel that these should still be retained. There are other parts of London where there is a lack of industrial land space. There should be a co-ordinated London-wide approach to dealing with this – rather than handing more land over in the Thames Gateway for high-end business sectors.

User: Cemex UK Ltd

Draft Policy E5, Strategic Industrial Land

Draft Policy E5, is supported, subject to some minor amendment and additions so that it is consistent with other provisions in the draft London Plan and the NPPF.

Part E to be expanded to ensure that adequate protection is applied not only to on-site industrial operations, but also along access routes so that vehicular movements essential to industrial/logistical operations are not compromised by new developments.

"E Development proposals within or adjacent to SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial-type activities and their ability to operate on a 24-hour basis. In line with Agent of Change principles (Policy D12 Agent of Change) residential development adjacent to SILs or along key access routes to them should be designed to ensure that the industrial activities are not compromised or curtailed. Particular attention should be given to layouts, access, orientation, servicing, public realm, air quality, soundproofing and other design mitigation in the residential development."

User:	Shaw Corporation Limited

- **Policy E5 Strategic Industrial Locations (SIL)** – We support the approach to SIL set out in part D of Policy E5, which allows for the strategically coordinated process of SIL consolidation through a planning framework or Development Plan document review process and adopted as policy in a Development Plan or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough. Notably, we support the consolidation of SIL at Old Kent Road to facilitate the regeneration of the Old Kent Road as set out in the emerging Old Kent Road Area Action Plan.

User: UKWA

It is vital that sufficient, appropriately located and designed land for logistics and freight operations is made available across London. Whilst the intention to move to sustainable transport functions is understood, the delivery of this policy should not be undertaken until sufficient relevant infrastructure is in place. If there are shortfalls the result could be shortages or increased costs for supplying and servicing London.

9) We welcome the proposal to ensure sufficient availability of low-cost industrial and related space for micro and small businesses. Finding appropriate, affordable space is a continuous challenge for small and micro businesses.

User:	UKWA

Intensification and co-locations are not the ‘silver bullets’ and other bolder measures are need to make sure there is sufficient land available. Also this policy doesn’t recognise the need for continued investment in the infrastructure including power, water, high level digital connectivity and transport to support the continued success and growth of the SILs.

User: UKWA

Whilst the intention is for there to be no net loss of industrial floorspace capacity, we feel this is unambitious and could stifle economic growth across the capital. There has been over three times more industrial land lost than set down in the London-wide benchmark in the previous London Plan and around eight times more in central London Boroughs.

There should be plans to increase availability of industrial land to ensure the capital can continue to be supplied and serviced throughout the term of this new London Plan.

A lot of space will be under the threshold and will be down to Boroughs to monitor – we feel it is going to be difficult for the GLA to measure ‘no net loss of space by 2041’

Bolder solutions are needed to identify new industrial sites within OAs and in and around town centres or other areas identified by the boroughs.

User:	UKWA

UKWA welcomes the Agent of Change principle but would like to see it go broader beyond just noise and recognise that issues including traffic, vehicle movements, vibrations, dust and odour are also taken into account. Also the principle needs to allow for expansion and transfer of occupancy.

User: Unknown

The principle to retaining the Borough's supply of designated employment land is broadly supported by our client. However, given the significant pressure from Central Government and the GLA to increase residential/mixed use developments and the inflexibility that the draft plan provides to release business space, this objective may be difficult to achieve.

Our client considers that the Mayor needs to take into account the dramatic uplift in the number of new homes needed to be built in London as set out not only in the draft plan but the higher number in the recent MHCLG consultation Planning for the right homes in the right places. If the national consultation proposals are enforced, it would mean a huge increase in the amount of homes needed to be planned for within London. Given the increased need for housing land, our client does not see why London needs to continue to protect all SIL some of which can be redeveloped and provided in more suitable locations outside of London, particularly when other policies such as air quality are considered.

User: London Stansted Cambridge Consortium

Industrial, Logistics and Related Land Uses (E4, E5, E6)

The Plan establishes a general principle of no overall net loss of industrial floorspace in SILs and Local Strategic Industrial Sites (LSIS) in London and designates most boroughs within LSCC for the “retain capacity” approach.

LSCC recognises the need to retain industrial land and floorspace capacity given loss of supply in the last decade and the importance of supporting industrial, logistics and related uses. Providing space for logistics sector is particularly important, given the strength of the sector in the corridor and acknowledged growth in demand.

LSCC partners, however, have concerns around the simplicity and rigidity of the policy and the implications on strategic planning. Some London boroughs lack available employment space suitable for key sectors (as identified in the plan) and the rigidity of SIL further constrains these boroughs in growing diverse “good economies”. Partners are also worried about whether restrictions could result in decisions that do not consider the most appropriate spatial and urban planning solutions.

We feel a more nuanced and flexible position on the land use classes that can be considered on SIL sites is required and greater clarity on conditions for release is needed. This would help boroughs identify suitable intensification, consolidation, co-location and relocation opportunities within SIL (as referenced in the plan). |LSCC is keen to collaborate with GLA partners to work towards a joint vision for the future of SIL uses.

User:	London + Regional Properties

Draft Policy E5 relates to SILs, and specific SILs are outlined in Table 6.3. As per the current London Plan, Albert Island is not designed as a SIL in the draft London Plan.

L+R support the continued recognition in the London Plan that Albert Island is not designated as SIL. The Draft Royal Docks Opportunity Area Planning Framework (OAPF) (2016) had proposed that Albert Island could be designated at new SIL, which L+R consider would provide an overly restrictive requirement to protecting and intensifying the employment function of the area, without providing sufficient flexibility to support a range of alternative uses to support the delivery of commercial space. Accordingly, continuity between the current and proposed London Plan regarding SIL designations is welcomed.

User:	Network Rail
Policies E4 and E5 – It is requested that acknowledgement is made of the differences between Network Rail operational land, and land adjacent to the operational railway, and general employment land. The nature of the railway means that there are a number of factors such as type of use, type of operations and nature/characteristics of site, which can often mean that an employment designation is not suitable. It is, therefore, requested that flexibility is included in these policies to allow for a change of use should the current use impact on the safe and efficient operation of the railway.	

User: Pat Turnbull

Policy E5 Strategic Industrial Locations (SIL)

Policy E6 Locally Significant Industrial Sites

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

These policies need a rethink. There is a danger that the process of intensification as suggested in these three policies will drive even more industry out of the capital. Industrial estates and other workplaces often consist of low rise buildings rented relatively cheaply. If a plan-led process leads to these buildings being demolished and replaced by higher rise new buildings, some industries will not be able to use them, and others may be driven out by increased cost.

So this drive to cram more in may destroy even more workplaces. There seems here to be a dogmatic view of what is desirable in London which may contradict reality and create a London which does not provide jobs or meet Londoners' needs. It may look prettier, but is that the prime consideration when it comes to economic activity?

Certain types of mixed use development are likely to militate against certain types of industrial production e.g. developers of housing for market sale will not want economic activity nearby which will lower the price of the housing.

User:	Balfour Beatty

Protected Industrial Land Policy E5 - Strategic Industrial Locations (SIL) Balfour Beatty supports the encouragement of intensification, co-location and substitution within SILs. SILs should be proactively managed through the development plan process and with the policy's provisions to make more efficient use of land in SILs

User:	Essex County Council

The explicit recognition for waste management being a ‘other industrial-type function’ that could be appropriately located within industrial locations alongside other forms of industry / employment is strongly supported, as is the policy approach of securing the potential for 24hour operation in these areas. It is however considered that the provisions relating to waste management could be explicitly extended to Policy E6 – Locally Significant Industrial Sites in order to confirm the appropriateness of waste facilities in these areas, where the waste management facility proposed can be suitably located within the LSIS in terms of built form, emissions, transport movements etc. such that it would not be detrimental to the character or aims of the LSIS.

Policy E6 Locally Significant Industrial Sites

User: London Borough of Islington

Draft London Plan Policy

Policy E6 – Locally Significant Industrial Sites

Islington Response

The policy recommends that boroughs define detailed boundaries of LSIS, as justified by local evidence. It advises that Policy E7 is taken in account when considering the scope for intensification, co-location and substitution. It then sets out that the development plans should make clear the uses that are acceptable in LSIS, where appropriate, hybrid or flexible B1c/B2/B8 suitable for SMEs, and distinguish these from local employment areas that can accommodate a wider range of business uses. We support the introduction of policy specifically for LSIS which we consider an important source of industrial land in London, and we welcome the scope for identifying new LSIS designations where supported by evidence.

Islington's only locally significant concentration of industrial / warehousing employment land is located adjacent to the northern boundary of the CAZ near Kings Cross. The Vale Royal / Brewery Road LSIS is by far the largest concentration of industrial activity and its significance will be strengthened in the review of the Local Plan by including a specific spatial strategy to guide the future for the area.

The London Plan no longer refers to 'other industrial sites'. Islington has some local – non-LSIS - industrial sites which will no longer have a degree of strategic policy protection. We would support reinstating policy on these areas, deferring to Local Plans for detailed guidance.

User:	Galliard Homes

The Plans newly stated position in respect of LSIS is a new intervention, not previously seen from previous GLA administrations. We understand the background behind the GLA's intervention, and agree with Policy E6 – Locally Significant Industrial Sites that this should be managed via an authority's Local Plan, as has been the case since 2006; and not the GLA.

User:	London Borough of Barnet

Barnet has lost a significant amount of employment space to residential uses in recent years, largely precipitated by changes to the Use Classes Order. It is therefore particularly important that the London Plan recognises the economic potential in, and importance of, encouraging commercial growth in key Outer London locations. Our recent Employment Land Review highlighted that Local Plan policy should encourage investment in our LSIS as a source of supply of small units with intensification and a mix of commercial uses encouraged, New stock is likely to use land more intensively and to provide more flexible space that is appropriate to modern business processes. Our Local Plan will consider a move towards encouraging the development of hybrid space (or the hybridisation of existing space) whilst inconsistent with its nominal intended use (from a market or planning use class point of view) may be the most effective way of ensuring that at least some employment land stays in employment uses, rather than rigidly sticking to use class-based conventions the value for which will not support redevelopment in a reasonably foreseeable time frame. However, the relaxation of PDR complicates the encouragement of greater flexibility in responding to market change.

User: London Borough of Lambeth

Lambeth supports the overall approach and agrees with its ‘retain’ classification. In practice it has been very difficult to retain industrial capacity through the planning system to date, given a perceived inter-changeability of industrial uses and B1a office space. It is hoped that the specific emphasis on industrial capacity defined as specific use classes will assist with this. Clarification of the approach on yardspace (as opposed to floorspace) is also welcome, although this needs to be carried through into the monitoring approach set out in Chapter 12 (reference only to industrial floorspace).

Please could the London Plan clarify whether B1b space for research and development of products and processes is intended to fall within the definition of industrial capacity – some of the supporting evidence suggests that it is, but there is no mention in the Plan itself. In Lambeth’s view, B1b should be included within the definition of ‘industrial’. Some sui generis uses should also be included within the definition of industrial capacity e.g. some waste uses, some operational uses – there is no mention of these in the Plan.

With regard to potential for intensification of industrial land, in Lambeth’s view this should not be considered to mean allowing residential uses within industrial areas on a systematic basis. Historically Lambeth allowed mixed-use areas within some of its LSIS (under the Lambeth UDP 2007) and this resulted in quite a rapid erosion of these designated areas, such that a number have now been de-designated. Lambeth has since removed these mixed-use areas and does not intend to revisit that policy approach.

User: Create Streets

Better Brownfield: How to banish boxland and turn it into popular, mixed-use London-like neighbourhoods and streets without losing jobs or shops

Relevant Policies:

Chapter 1 Planning London's Future (Good Growth Policies) pp.9-26
D1 London's form and characteristics (p.98)
D8 Tall buildings (p.126)
H1 Increasing Housing Supply (p.144)
E5 Strategic Industrial Locations (SIL) (p.239)
E6 Locally Significant Industrial Sites (p.245)
E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function (p.246)

Greater clarity on mixed-use ‘London-like neighbourhoods’ on brownfield sites. Obviously much of the focus of the London Plan is on building on brownfield sites. The London Plan should more clearly aim to develop brownfield and industrial sites into complex ‘London-like’ mixed neighbourhoods. These should be more clearly described and defined so that they can be measured. The tension between the need for ongoing industrial use and the need for more housing should be explicitly referenced in the London Plan with preference for ‘London-like neighbourhoods’ with maintenance of ongoing use and the importance of streets and urban form reflected more clearly in policies GG2, D1, E7 and H1. The policy on Healthy Streets (T2) should also reflect the need for a good urban form, beauty and lack of high rise wind tunnels materially to encourage walkability.

As London grows there will be competing pressures for land. The draft Plan highlights concerns over the loss of commercial space in the capital and its effects on economic prosperity. Policies E5 and E6 offer protection to Strategic Industrial Land and Locally Significant Industrial Sites. The Mayor is right that productive land uses should not be swept aside to make way for sterile dormitory developments. However, there is a danger that borough officers interpret these concerns too narrowly, settling for the safety of the status quo rather than risk creative change. Land use on boxland industrial sites is rarely optimal and we must not waste the potential to combine uses with better design. Boroughs should therefore critically look at all industrial sites, even those that are operational, to determine if a ‘mixed use’ approach is possible. Landowners of industrial and ‘big box’ retail sites must be even more strongly encouraged to come forward with Mayoral support. Policy E7 is useful in this context but should be more ambitious. It also needs far more reference to issues of good growth and urban form.

User:	London Borough of Haringey
The Council supports the principle of this policy.	

User: RICS

Growing a good economy

Through policies **E4, E5, E6 and E7** the Mayor also states the need to protect and enhance London's existing industrial sites. This is a critical issue for a diverse London economy. One of the drawback members suggested is a reluctance amongst planners and developers to locate light industrial (use class B1) within residential developments, even though it is approved in planning policy. This is due to a negative perception of industrial and lack awareness of the benign nature of light industrial properties. Co-locating light industrial alongside residential would make an excellent contribution to the mayor's goal of creating mixed use spaces and help better focus heavy industrial sites by providing more options for occupiers.

User:	London Borough of Lewisham

We acknowledge that the SHLAA has not included SIL sites in order to protect designated industrial land. Some SIL sites are likely to come forward with planning applications that will seek to consolidate and intensify capacity whilst introducing new mixed use residential development too.

User:	London Borough of Lewisham
We support E6 and already have policies in our Local Plan relating to LSIL.	

User:	London Borough of Brent

The Council supports the principle of this policy, subject to the GLA with regards to Part A having a proportionate and pragmatic approach to considering the opportunities provided by some of the LSIS in Brent for wider benefits consistent with the Good Growth Principles of the London Plan. These could seek a wider range of uses/intensified redevelopment (including at least a replacement of existing employment space/jobs) in some areas of LSIS.

User:	London Borough of Tower Hamlets
We support this policy.	

User:	Royal Borough of Kingston

RBK agrees that any loss of employment land should come through as part of a plan-led approach and not through ad-hoc applications. However, residential use should not be included as one of the potential uses for intensification unless there is a planned release as set out in the London Plan. Intensification for other uses are supported except where this can hinder legitimate industrial activity. RBK seeks assurances that sufficient industrial land is protected for current use and future growth, including logistics and distribution to support transport objectives such as freight consolidation, green industries, maker-space and relevant creative industries. For this reason, it is considered that the total land should be protected, not the current capacity which fails to support future growth. RBK supports the deletion of the sub-categories of SIL (**Policy E5**), given that it can add much needed flexibility of uses in these locations and will better allow increases in job density and co-location of different employment uses.

User: London Borough of Waltham Forest

We welcome the recognition of the important role industrial land plays in London's economy; particularly in East London and Outer London.

We support the Mayor's position that there should be no net loss of industrial floorspace capacity in the borough, set out in policy E4 Part C, Figure 6.1 and Table 6.2.

We agree with Policy E4 Part G and have already introduced Article 4 Directions preventing permitted development rights for the change of use from light industrial B1 (C) to residential C3.

We agree with policy E5 part A. We recently commissioned Regeneris Consulting to undertake a Business Audit of our Strategic Industrial Locations and our Borough Employment Areas to see how these could best be proactively managed to sustain them; including what could be achieved through the plan-led process but also through business and regeneration support.

We agree with Policy E5 part D. We are producing an Employment Strategy to underpin our Local Plan and part of this process will be considering if we need to consolidate any of our SIL; particularly in the context of Part E of the same policy.

We support limited release of industrial land as long as there is no net loss of industrial floorspace and are considering options to deliver this within Lea Bridge and Leyton, our key growth area. We are aligned with Policy E7 part A. As a borough with limited land resource and a high housing target and need, we are exploring how and where we can deliver intensification. At present, we are working on two sites to see if this could work. The first site is Low Hall Depot, where we have commissioned work on the feasibility of stacking different uses with industrial. The second site is Rigg Approach, where we are working with the GLA Regeneration Team to see if intensification could work whilst retaining the existing employment floor space. If feasible these will be included as policies within our new Local Plan.

The resource implications of delivering this work across planning, regeneration and business teams need to be recognised, and where possible the Mayor should provide funding and resource to assist in the delivery of proposals for intensification and retention of employment land.

User: London Borough of Merton

Support with amendments While the principle of supporting a dynamic and thriving economy, businesses and jobs is fully supported, there are tensions between these four policies and also with the overall strategy set out for Opportunity Areas in Wimbledon, elsewhere in the Wandle Valley and the Trams Triangle intensification.

The approach set out on industrial land consolidation in E7 with diagrams at Figure 6.3 seems that it will apply in very specific circumstances: for example where industrial land is very valuable and sought after and cannot be sought elsewhere (e.g. beside a major port or major airport). Most industrial land in the Wandle Valley is not like that. The South London Partnership has identified South Wimbledon Business Area and Willow Lane (both SILs and Business Improvement Districts) as being the highest value, highest demand business areas across five boroughs in South London. Even with this, investment in a multi storey B8
warehouse is (a) very unlikely to be viable in these locations, especially when taking account of the requirements set out in Policy E7 1-4 and all connected policies and (b) very unlikely to deliver the business space and jobs that London needs. It seems that collectively these policies are taking an academic approach that may work in specific parts of London (e.g. near airports, ports and motorway corridors) and trying to apply it across the whole of Greater London.

Part of the areas within the Tram Triangle and Opportunity Areas within Wimbledon are designated industrial areas (SIL and LSIS) . We welcome the opportunity to explore making more effective use of land as set out in policy E5 (b)(3) but we consider that it should not be conditional on the approach set out in policy E7. In some cases, land along the Wandle Valley was in historic industrial use and has an industrial use on a specific site that would be unlikely to ever be applied in a modern planning system (for example, the site is in heavy industrial use but for historic reasons is sited beside the river Wandle on residential roads, adjacent schools, homes, nature areas) When this industrial usage ceases, it is reasonable for all appropriate uses to be explored, including for social infrastructure, workspace and homes. Policies on the Tram Triangle, reuse of brownfield land, environmental improvements, modal shift, improving air quality, reducing noise pollution and developing Opportunity Areas support this approach but the series of policies E2-E7 do not allow for this.

Our view is that there is scope for some intensification of business areas – whether designated or undesignated – alongside community or residential use, particularly where these are in retail warehouse use currently. We would welcome a rationalisation of these policies, to focus on the laudable and fully supported aim of supporting London’s economy and jobs, rather than the extensive detail and prescriptive requirements that they set out.

User: AECOM

Our thoughts:

London's previous approach has been to deliver new homes on vacant industrial land. This has resulted in an over-release (circa 100 ha per annum over 5 years), despite increasingly strong demand. This **risks** future economic competitiveness.

Land values create a dichotomy, in which the importance of industrial land competes against higher residential development values. The Draft London Plan's response of no net loss of floorspace recognises a **changed approach** from land to floorspace capacity.

Delivery and viability will be challenging, however this approach offers an opportunity for creative **co-location and intensification** of industry and other uses.

How Can AECOM Help?

AECOM's pan-London experience provides us a unique understanding of the need to provide homes without undermining vital industrial and logistical functions.

AECOM prepared the London Industrial Land Supply and Economy Study (2015), informing this London Plan, which positions us to identify opportunities both in plan preparation and development needs, that coincide with the City for All Londoner's vision embodied within the new plan.

User:	London Borough of Hounslow

LB Hounslow strongly supports policies E5-E8 in unlocking redevelopment of industrial areas, but these policies should make clearer reference linking improved public transport accessibility levels with potential for development. This is principally due to the fact many larger industrial locations are often particularly poorly served by frequent commuter services.

LB Hounslow supports this policy see above

User:	London Borough of Wandsworth

Support the continued approach to identifying Locally Significant Industrial Sites in Local Plans and the approach to considering intensification as long as there is a clear evidence base to do so.

User:	London Borough of Richmond Upon Thames
Support the continued approach to identifying Locally Significant Industrial Sites in Local Plans and the range of uses acceptable.	

User:	London Borough of Harrow

The Council supports the principle of this policy, subject to the GLA with regards to Part A having a proportionate and pragmatic approach to considering the potentially limited opportunities provided by some of the LSIS in Harrow for intensification under Policy E7. Potential LSIS sites should not be excluded from such designation simply because they have limited potential for intensification (see comments on Policy E7 below).

User: Berkeley Group

7.11. Given the historic nature of many industrial sites and the need to identify land for housing, policy E6 should seek that boroughs review as well as define Locally Significant Industrial Sites as required by the NPPF (paragraph 22):

Policy E6 Locally Significant Industrial Sites

A In their development plans, boroughs should:
1) Review designations for Locally Significant Industrial Sites to ensure that they are still needed, identifying scope for release of sites/parts of sites for other uses including housing.

7.12. The process of consolidation and release of SIL or LSIS might ideally be through the development plan process or a masterplan, but there may be circumstances where this would be more expedient through the planning application process, if appropriately consulted upon and in agreement with the borough:

User: Just Space

Policy E6 Locally Significant Industrial Sites

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

Proposed changes

A In their Development Plans, boroughs should:

1. designate and define detailed boundaries and policies for Locally Significant Industrial Sites (LSIS) in policies and maps justified by evidence in local employment land reviews taking into account the scope for intensification, co-location and substitution (set out in Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function) - *other evidence such as local economic audits should be used to support LSIS boundary designation and understand links to wider local employment, supply chains etc*

2. make clear the range of industrial and related uses that are acceptable in LSIS including, where appropriate, hybrid or flexible B1c/B2/B8 suitable for SMEs and small branches and distinguish these from local employment areas that can accommodate a wider range of business uses.

User:	London Borough of Bexley

Policy E6 Locally Significant Industrial Sites sets out the requirement for London boroughs to designate LSIS and the Council welcomes the opportunity to define boundaries according to local evidence. Concerns however are raised regarding the draft Plan's approaches of intensification, co-location and relocation. This is expanded upon below in the Council's response to **Policy E7**.

User:	Federation of Small Businesses
Information about the acceptable uses in LSIS should be easy to find on Borough websites.	

User:	Pilbrow & Partners

Policy to be redrafted to permit B1(a and b) in addition to B1(c), B2 and B8 uses to facilitate co location of employment uses. In economic clusters co location of businesses is often key to their success and growth. Greater flexibility in the application of the Use Classes Order should be encouraged.

User: SEGRO

Draft Policy E6 states that Boroughs should define detailed boundaries and policies for Locally Significant Industrial Sites (LSISs). We support the principle of defining LSISs and suggest that the policy is developed further to confirm support for their ongoing protection, and intensification. Also as set out in Section 4 of these representations, we recommend that Opportunity Area Planning Frameworks should identify and designate new LSISs to meet last mile demands in line with population and business growth forecasts in and around these areas.

User: SEGRO

Appendix – SEGRO Proposed Policy Amendments to Policy E6 Locally Significant Industrial Sites

A In their Development Plans, boroughs should:

1. define detailed boundaries and policies for Locally Significant Industrial Sites (LSIS) in policies maps justified by evidence in local employment land reviews taking into account the scope for intensification, co-location and substitution (set out in Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function)
2. make clear the range of industrial and related uses that are acceptable in LSIS including, where appropriate, hybrid or flexible B1c/B2/B8 suitable for SMEs and distinguish these from local employment areas that can accommodate a wider range of business uses.

B Opportunity Area Planning Frameworks should identify and designate new LSISs to meet last mile demands in line with population and business growth forecasts in and around these areas.

User:	U+I
This policy should clarify intent of non-inclusion of other alternative uses in such areas (such as offices) if this approach is to be pursued.	

User: Chartered Institute of Architectural Technologists

Economy

Policies E1 to E11

We are in agreement with the proposals contained in the plan.

User:	British Property Federation
We support the Mayor’s policy for Locally Significant Industrial Sites.	

User: Crest Nicholson PLC

We consider this Policy to be unsound as currently drafted and amendments are required.

Whilst Crest Nicholson recognises the importance of maintaining SIL and LSIS Policy E6 should be adjusted to make it clear that where residential uses can be introduced into these area without adverse effect on the operation of the industrial uses that this may be permitted. There are many examples of industrial uses and residential uses sitting side by side and indeed vertically stacked within one building where the uses can successfully co-locate for example Kings Cross has a Travis Perkins trade counter located below residential units. The policy as drafted does not allow for this type of proposal to be brought forward and assessed by local planning authorities. We suggest the policy be amended so that in E6 so that amendment to A and a new B are introduced to read along the following lines:

"New Part A 3): identify where non-industrial uses (being those other than set out in Part A 2) above) will be considered (in accordance with Policy E7 Part C below) subject to compliance with the principles set out in Part B below."

"New Part B: Where the relevant borough is satisfied that introduction of a non-industrial use into a part of a LSIS will comply with the requirements of this Part B and Agent for Change principles (Policy D12 Agent for Change) then development proposals for such uses within a LSIS should not be refused. Proposals should not compromise the effectiveness of the LSIS in accommodating industrial type activities and such development proposals should be designed to ensure that industrial activities are not curtailed; particular attention should be given to layouts, access, orientation, servicing, public realm, air quality, soundproofing and other design mitigation in the non-industrial use"

User:	King’s College Hospital NHS Foundation Trust

We propose the following additions (underlined) to widen the ‘related uses’ within LSILs to allow medical uses outlined in part A2 of Policy E6:

Part A2 of Policy E6: *“make clear the range of industrial and related uses that are acceptable in LSIS including, where appropriate, hybrid or flexible B1c/B2/B8 suitable for SMEs and distinguish these from local employment areas that can accommodate a wider range of business uses, allowing flexibility for research and training allied to medicine and the development of bio-medical hubs and science centres.*

User: Vital OKR

A
In their Development Plans, boroughs should:

1.Designate and define detailed boundaries and policies for Locally Significant Industrial Sites (LSIS) in policies maps justified by evidence in local employment land reviews taking into account the scope for intensification, co?location and substitution (set out in Policy E7 Intensification, co?location and substitution of land for industry, logistics and services to support London's economic function)

2.Make clear the range of industrial and related uses that are acceptable in LSIS including, where appropriate, hybrid or flexible B1c/B2/B8 suitable for SMEs and small branches and distinguish these from local employment areas that can accommodate a wider range of business uses.
(There is an urgent need to designate land that is not currently designated because it was previously thought it did not matter (could all be got rid of). Change of strategic policy, to no nett loss, strongly supported by the evidence base, now require fresh designation, not just refining boundaries of already designated land),

User: London Borough of Newham

Policy E6 Locally Significant Industrial Sites

LBN are generally supportive of the policy which is complementary to Newham's Draft Revised Local Plan. The wording in 6.6.1 could however be strengthened recognising the inter-play/relationship between LSISs and SILs and their role in alleviating pressure on SIL as part of the reservoir of employment land to support economic growth

User: Owners and Tenants of Cygnus Business Park

Policy E6: Locally significant industrial sites

5.21 Whilst we broadly agree that Locally Significant Industrial Sites (LSIS) be identified within the development plan, we contend that such designations are often wrongly applied to other employment or sui generis uses or underperforming industrial areas with the policy being overly restrictive, hampering re-development proposals which may make a better and more efficient use of land and counter to the objective of encouraging mixed uses.

5.22 We appreciate the importance of safeguarding Locally Significant Industrial Sites (LSIS) in London. We have no doubt that such sites are coming under increasing pressure for re-development for residential use. However, it is clear that some of the Boroughs have allowed LSIS sites for residential development – as set out at paragraph 2.57 of the SHLAA 2017 – albeit it is unclear how many LSIS sites have been exempted as the SHLAA does not provide this detail.

5.23 We consider that the question of whether an LSIS site should be allocated for redevelopment (mixed use where feasible or for pure residential) is properly a matter for the local authority in question and they should be able to explore this question through a local plan. As local designations it is more appropriate that decisions over the future of such sites should be made by the Boroughs.

5.24 Policy E6 should therefore encourage the Boroughs to consider the necessity of retaining individual LSIS and should encourage them to consider whether the objectives of the London Plan would be better served by either full or partial redevelopment for housing where the latter enables employment to be retained but making more efficient use of the land. The Boroughs should be allowed discretion to decide whether it is appropriate for these sites to be kept as industrial sites.

The current wording of this policy is unsound as it is ineffective. To ensure these LSIS designations remain up-to-date and reflective of the changing market it is recommended that an additional clause be added to this policy. We suggest that Policy E6 is re-drafted to include a new clause at the beginning (Part A 1) and at the End (Part A 4 and 5) that reads:

A. ~~In their Development Plans,~~ Through their development plans, Boroughs should:

1) explore as part of their assessment of their housing and employment land supply needs whether LSIS sites should still be retained for industry. This judgement should be based on local considerations including the demand for such sites for employment, the context of the site, the scope for intensification, co-location and substitution (set out in Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function) and the contribution that housing would make to local need;

2) define detailed boundaries and policies for Locally Significant Industrial Sites (LSIS) in policies maps justified by evidence in local employment land reviews taking into account the scope for intensification, co-location and substitution (set out in Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function)

3) make clear the range of industrial and related uses that are acceptable in LSIS including, where appropriate, hybrid or flexible B1c/B2/B8 suitable for SMEs and the co-location of residential and other uses (and distinguish these from local employment areas that can accommodate a wider range of business uses.

4) Monitor and review the appropriateness of these boundaries and associated policy to ensure land remains in its most efficient use and reflects changing market signals.

5) In the absence of an up-to-date development plan, permission should be granted for appropriate mixed-use re-development which meets the policies of the London Plan and increases the housing supply.

User: Dagenham Dock Limited

Draft Policy E6 – Locally Significant Industrial Sites (LSIL)

On the basis that DDL's commercial asset at Dagenham Dock is LSIL, our client's attention is drawn to Draft Policy E6, focussed on the Capital's locally defined industrial land. DDL feel that it is important that the Mayor does not simply safeguard industrial land in existing locations. Whilst it is positive that the Plan seeks net retention of industrial land within London; it should be recognised that the most appropriate locations are not always those that are currently in industrial use. In many areas these sites are central to areas of considerable change and regeneration. In these scenarios, the industrial land should be consolidated to more strategic locations within the borough with better access to the strategic road and rail network.

Whilst it is acknowledged that LPA Development Plans progress against different timeframes, a clause must be included within Draft Policy E6 which allows development proposals to be considered against emerging Development Plans and Frameworks for the London Boroughs. DDL's land at Dagenham Dock has been defined within the draft London Borough of Barking and Dagenham Local Plan for release from a LSIL designation since early 2015, with the LPA clearly demonstrating that the land was surplus to industrial requirements. This was also reflected within the GLA's London Riverside Opportunity Area Planning Framework which was published in September 2015. DDL's business plan shares this vision for the site.

Accordingly, DDL object to the current wording of Draft Policy E6 and encourage the GLA to incorporate a clause which facilitates the release of land from LSIL where the LPA identifies environmental, economic and social advantages to residential-led mixed use development in areas where the acute demand for housing significantly outweighs the retention of the LSIL for employment uses. This should be considered in the same context as the supporting text at para. 6.6.1 which allows for the designation of new LSILs on the basis of a robust evidence base. This would also prevent conflict with planning decisions which have been made prior to the adoption and implementation of the new London Plan.

For example, in the case of DDL’s land at Dagenham Dock, land immediately east at Beam Park has previously been released by the GLA and the London Borough of Barking and Dagenham from industrial / employment uses to facilitate residential-led, mixed use development by Countryside Partnerships and L&Q – which is currently subject to planning application ref: 17/01307/OUT. Further, the land immediately west of the Dagenham Dock site, owned by Aviva is also subject to a residential based planning application (ref: 17/01752/REM and 17/02111/FUL). Taking account of recent planning decisions, it would not be appropriate in this location to insist on the retention of employment uses on this former LSIL site; a use which would not be complimentary to recent residential planning consents on neighbouring sites.

User: London Borough of Ealing

This policy is supported particularly in its encouragement for Local Plans to define specific roles for LSIS. This is essential for Ealing which has the largest projected net loss of jobs of any LPA.

This policy must also be reinforced by a clear statement elsewhere in the plan that LSIS is not a second class citizen. We therefore suggest that a new clause is added reflecting the comment on E5 above;

‘Industrial-type uses are always to be preferred for development within LSIS and the presence of extant non-conforming uses does not reduce the need for a given site to provide industrial capacity. Development activity should always seek to reinforce the integrity of the LSIS as a whole and to return sites with non-conforming uses to preferred uses as defined by boroughs.’

User: Lidl UK GmbH

Lidl agrees that it should be the role of each borough's development plan to identify locally significant industrial sites. It considers that the recommended approach in parts A1 and A2 to be reasonable and sound but considers that an additional element to the policy is required in order for it to be consistent with proposed policies E5 and E7.

In particular, Lidl recommends that E6 is expanded to include a third element which requires boroughs to include within their 'locally significant industrial sites' policies clear guidance as to how proposals for non-Class B uses will be dealt with. Such guidance is likely to be based upon the contents of parts B, C, D, E and F of proposed Policy E7 and will also include demand assessments to ensure that former industrial sites/premises are not unrealistically safeguarded when market signals suggest otherwise.

User: DPDgroup UK Ltd

Policies E5 & E6 - Strategic Industrial Locations and Locally Significant Industrial Site

DPDgroup UK Ltd Response to the Draft London Plan Consultation | 6 |

DPD supports the protection of strategic land locations around London but is concerned at the lack of coverage in central London. All of the locations detailed require significant stem mileage to get into the city centre. This will increase vehicles on the road and move the externality to another area rather than addressing it directly.

The Boroughs of London need to protect B8 spaces to support neighbouring residential redevelopment through the planning process. It is natural that developers will bring industrial sites forward for residential redevelopment as the profitability of these sites is far in excess of industrial land. It is the role of the public sector to ensure B8 space is legally protected.

To meet consumer demand, DPD believes that well managed CEP operations should be considered as part of residential developments. By working with the CEP sector, this can be achieved without impacting upon the residents quality of life. Paris has best practice examples of a school and residential areas being located above a final mile delivery depot.

User:	Richard Bennett

Policy H1, B 2 f) refers to Policies E4, E6 & E7. These policies should be checked to ensure that they do not discriminate against Gypsies & Travellers and make future site provision more difficult.

User:	Oneill Homer

E6 This will be a challenge for Boroughs to implement quickly and effectively. Identifying LSISs and setting appropriate development principles to manage their mix and scale of uses requires detailed local knowledge and a deep understanding of the business and land use relationships between the land and its surrounding area. Neighbourhood plans that have strong local business representation are well placed to assist Boroughs in this process or to take on this responsibility.

User: London Stansted Cambridge Consortium

Industrial, Logistics and Related Land Uses (E4, E5, E6)

The Plan establishes a general principle of no overall net loss of industrial floorspace in SILs and Local Strategic Industrial Sites (LSIS) in London and designates most boroughs within LSCC for the “retain capacity” approach.

LSCC recognises the need to retain industrial land and floorspace capacity given loss of supply in the last decade and the importance of supporting industrial, logistics and related uses. Providing space for logistics sector is particularly important, given the strength of the sector in the corridor and acknowledged growth in demand.

LSCC partners, however, have concerns around the simplicity and rigidity of the policy and the implications on strategic planning. Some London boroughs lack available employment space suitable for key sectors (as identified in the plan) and the rigidity of SIL further constrains these boroughs in growing diverse “good economies”. Partners are also worried about whether restrictions could result in decisions that do not consider the most appropriate spatial and urban planning solutions.

We feel a more nuanced and flexible position on the land use classes that can be considered on SIL sites is required and greater clarity on conditions for release is needed. This would help boroughs identify suitable intensification, consolidation, co-location and relocation opportunities within SIL (as referenced in the plan). |LSCC is keen to collaborate with GLA partners to work towards a joint vision for the future of SIL uses.

User:	Pinkham Way Alliance

NB Waste Policy S18 is inconsistent with Policies E6, SK1, E4, and E7 insofar as it refers to Locally Significant Employment Sites/Land. This is the only reference to LSES/L and it is not referred to in the narrative. It should be amended to Locally Significant Industrial Sites which would be consistent with the explanatory narrative throughout the rest of policies and narrative in the Plan and it would remove the confusion about whether designated ‘Employment sites’ were suitable for waste uses

User: London + Regional Properties

Draft Policy E6 requires local planning authorities to define boundaries and policies for LSIS. The draft policy directs Councils to clearly identify the range of industrial and related uses that are acceptable in LSIS including, where appropriate, hybrid or flexible B1c/B2/B8 uses suitable for SMEs, and those that can accommodate a wider range of business uses. Designations should be based on evidence from local demand assessments.

The LBN Employment Land Review (ELR) (2017) reviews Albert Island and identifies that the site currently comprises low intensity use, but that the area is well located in relation to the strategic road network. The site is identified as having significant scope for intensification of employment uses (provided that airport safety is considered), making use of direct access to the dock and river access. The ELR recognises that the site will be comprehensively redeveloped.

L+R welcome the requirement for local planning authorities to define their own specific policies for LSIS based on evidence, but also consider that LPA designations need to provide an element of flexibility within certain LSIS in order to provide complementary uses to create a sense of community and improve viability.

The proposed business uses, the Shipyard, London City Airport expansion, the new employment hub (those B1(c), B2 and B8 uses) would achieve the objectives of the LBN LIL designation as it would deliver employment generating uses.

The scheme will also have a number of complimentary uses which will ensure a mixed-use community. This will function throughout the day and night, integrate into the neighbouring urban grain and provide on-site facilities for future workers and residents which will in turn help to attract industrial operators. Indeed L+R consider these complimentary uses are essential in order to ensure that the overall scheme is successful and that Albert Island meets its full potential as an industrial-led site.

Some of these complimentary employment uses may not be considered to be fully compliant with the LIL designation. This includes the proposed retail uses, the public house, the educational / training centre, the community marine facility, the hotel and new homes.

Notwithstanding this, as outlined above, we consider that these complimentary uses are necessary to ensure critical place making capabilities and the long term sustainability of the predominant employment uses that are supported by planning policy. Therefore by providing these complimentary uses, this will help to achieve the overall GLA and LBN employment policy objectives for the site as well as achieving a mixed-use neighbourhood, which is also supported by planning policy.

User: Pat Turnbull

Policy E5 Strategic Industrial Locations (SIL)

Policy E6 Locally Significant Industrial Sites

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

These policies need a rethink. There is a danger that the process of intensification as suggested in these three policies will drive even more industry out of the capital. Industrial estates and other workplaces often consist of low rise buildings rented relatively cheaply. If a plan-led process leads to these buildings being demolished and replaced by higher rise new buildings, some industries will not be able to use them, and others may be driven out by increased cost.

So this drive to cram more in may destroy even more workplaces. There seems here to be a dogmatic view of what is desirable in London which may contradict reality and create a London which does not provide jobs or meet Londoners' needs. It may look prettier, but is that the prime consideration when it comes to economic activity?

Certain types of mixed use development are likely to militate against certain types of industrial production e.g. developers of housing for market sale will not want economic activity nearby which will lower the price of the housing.

User:	Balfour Beatty

Policy E6 - Locally Significant Industrial Sites Balfour Beatty supports the encouragement of intensification, co-location and substitution within LSISs. These designations should be based on evidence in strategic and local demand assessments and that authorities should set out range of industrial and related uses that are acceptable in LSIS including, where appropriate, hybrid or flexible B1c/B2/B8 suitable for SMEs

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

User:	Mr Peter Eversden MBE
Policy E7 is supported.	

User: 6AM Development

It is essential for London's future that we co-locate industrial with residential. Co-location has worked successfully in mainland Europe for generations.

We have a history of locating industry in a seperate part of towns and cities to residential. As London has grown in all directions these industrial areas now border residential uses. The inefficiencies of industrial land use are obvious - single storey buildings with large service yards abut high density residential. Co-location will increase residential supply and renew the industrial stock.

I belive the term 'industrial' is misleading. It evokes an image that is towards the heavier end of industrial uses. In reality and more commonly, occupiers of industrial units in London are at the lower end of the scale - designers and makers of high quality handmade products and food and beverage producers for the large London market. These occupiers have been affected severely by the continued loss of industrial property in London.

They are ideal occupiers for developments with residential. Keeping these producers close to their markets and employees reduces traffic, congestion and carbon.

These occupiers prefer higher quality accommodation which isn't currently being developed. Any increase in this type of property should increase employment in these growing businesses.

Co-location is also a visible sign that London is working and producing for itself.

User: Miss Olga Astaniotis

The continued need for yard space should not be dismissed entirely. The businesses that need to service London's growing and changing character (24-hour economy, intensified housing and office-based businesses, growing tourism, reduced vehcile usage), will necessarily have to reside in the outer boroughs. They will not be able to function properly if we do not maintain the right mix of industrial premises. This plan makes no allowance for that and also seems to neglect the reality that some activities and jobs will continue to be "dirty", "noisy", "unappealing" for residents to have on their doorstep.

User: SUEZ Recycling and Recovery UK Ltd

E7D

SUEZ Recycling and Recovery UK Ltd (SUEZ R&R) currently owns and operates a recycling and resource recovery / waste management facility which is located on SIL land within London Borough of Merton (Ref 55 – Hallowfield Way within the Draft London Plan). Although the site is of significant size, operations have become increasingly constrained due to the sensitive nature of the surroundings. The site is located in very close proximity to residential properties, a school, listed buildings a conservation area and metropolitan open land.

SUEZ submitted a planning application for the redevelopment and modernisation of the Hallowfield Way site in 2008 and permission was granted in 2012 following call-in by the Mayor of London, after refusal by the LPA. During the determination of the planning application, due to the sensitive nature of the surroundings, SUEZ R&R had to accept several constraints in order to achieve planning approval, for example:

- Operation of the site was restricted to between 07:00 and 23:00;
- Vehicle movements associated with the development were only permitted between 07:00 and 17:00 Monday – Friday, 07:00 and 12:00 on Saturday and no vehicle movements on Sundays or bank holidays;
- SUEZ to minimise the overall number of bulk haulage vehicle movements to be undertaken during peak school run periods - 08:30 – 09:15 and 14:45 – 15:45.
- SUEZ R&R collection vehicles and bulk haulage vehicles contracted to SUEZ R&R to generally seek to avoid the eastern section of Church Road where practical during all other time periods.
- Compulsory arrival and departure of third party articulated vehicles from the western side of Church Road (right turn in, left turn out).

In recent years, the waste industry has been in a rapid transition and in order for recycling and resource recovery / waste management facilities to be viable and sustainable, particularly in London and the South East, it is essential that operations can be undertaken with efficient processing technologies, economies of scale and in a relatively unconstrained environment. Particularly critical is the ability to transport materials 24 hours a day, or certainly having the flexibility to transport during some of the less congested hours.

Part E of policy E5 reflects the needs of modern recycling and resource recovery / waste management facilities and other industrial uses, in stating that SIL locations should be capable of accommodating industrial type activities which can operate on a 24 hour basis. Furthermore, paragraph 6.5.1 highlights that SIL should be able to "accommodate activities which - by virtue of their scale, noise, odours, dust, emissions, hours of operation and/or vehicular movements – can raise tensions with other land uses and particularly residential development". Paragraph 6.5.2 continues, stating that SILs are typically located close to the strategic road network, well located with regard to rail, river, canals and safeguarded wharves and can support the sustainable movement of goods. Access to Hallowfield Way is provided via Church Road, a road which has narrow ‘pinch points’ and passes through the nearby conservation area which borders the site. The site benefits from few of the characteristics outlined within the London Plan which would render it suitable for ongoing industrial and employment uses.

The permission for the redevelopment of Hallowfield Way was implemented in 2015, however, due to the constraints placed on the planning permission, the site has never proven to be economically viable to develop fully. Consequently, SUEZ R&R has had to take the decision to identify an alternative site elsewhere within South London which is suitable and viable for the development of modern recycling and resource recovery / waste management operations.

Consequentially, Hallowfield Way SIL will now be available for redevelopment and at this stage, taking account of the sensitivity of the surroundings and the constraints placed on the previous redevelopment, the site is not suitable for continued industrial uses. Similarly, if the site was to be looked at as a ‘blank canvas’ it is unlikely that it would be designated as SIL today.

Taking account of the above constraints, SUEZ R&R, considers that the London Plan should contain a policy which also allows SILs to be considered for mixed use or residential development where the SIL has been constrained and compromised. Policy E7D, could be amended to state:

1. *Mixed-use or residential development proposals on **SILS, LSIS and** Non-Designated Industrial Sites will be supported where:*
    1. *it has been allocated in a Development Plan for residential or mixed-use development on the basis of part D.1; or*
    2. *there is no reasonable prospect of the site being used for the industrial and related purposes set out in part A of Policy E4 Land for industry, logistics and services to support London’s economic function; or*
    3. *industrial, storage or distribution floorspace is provided as part of mixed-use intensification where this is feasible; or*
    4. *suitable alternative accommodation (in terms of type, specification, use and size) is available in reasonable proximity to the development proposal and subject to relocation support arrangements for existing businesses before the commencement of new development. Mixed-use development proposals on Non-Designated Industrial Sites which co-locate industrial, storage or distribution floorspace with residential and/or other uses should also meet the criteria set out in parts E.2 to E.4 below.*

The above wording still provides protection for SILS which are viable, however, would facilitate a sensible review of those sites which cannot sustainably accommodate industrial uses in the longer term. Those sites can then be released to contribute to other community needs, such as significant residential delivery.

User: London Sustainability Exchange

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

1. The processes set out in Parts B, C and D above must ensure that:
    1. the industrial uses within the SIL or LSIS are intensified to deliver an increase (or at least no overall net loss) of capacity in terms of industrial, storage and warehousing floorspace with appropriate provision of yard space for servicing
    2. the industrial and related activities on-site and in surrounding parts of the SIL, LSIS or Non-Designated Industrial Site are not compromised in terms of their continued efficient function, access, service arrangements and days/hours of operation noting that many businesses have 7-day/24-hour access and operational requirements
    3. the intensified industrial, storage and distribution uses are completed and operational in advance of any residential component being occupied
    4. appropriate design mitigation is provided in any residential element to ensure compliance with 1 and 2 above with particular consideration given to:
        1. safety and security (see Policy D10 Safety, security and resilience to emergency and Policy D11 Fire safety)
        2. the layout, orientation, access, servicing and delivery arrangements of the uses in order to minimise conflict (see Policy T4 Assessing and mitigating transport impacts)
        3. design quality, public realm, visual impact and amenity for residents (see Policy D1 London’s form and characteristics, Policy D2 Delivering good design, Policy D3 Inclusive design, Policy D4 Housing quality and standards, Policy D5 Accessible housing, Policy D6 Optimising housing density, Policy D7 Public realm and Policy D8 Tall buildings)
        4. vibration and noise (see Policy D13 Noise)
        5. air quality, including dust, odour and emissions (see Policy SI1 Improving air quality and Policy SI2 Minimising greenhouse gas emissions).
        6. Water management and sewage treatment sites

LSx comments on E4 and E7

- Our communities strongly support the safeguarding of land for the purposes of infrastructure including logistics centres and infrastructure for water and sewage management; in fact there was a strong appetite more land and corridors to be safeguarded for these purposes, and set out similarly to the same process that has applied to the transport corridors. These should be set out clearly in the Infrastructure Mapping Application; this application should be referred to in the face of the London Plan.

Water and sewage management should be included in the SIL provisions.

User:	London Food LInk /Sustain
Design principles for greening, gardens and food provision should be incorporated into this policy. Also, drinking fountains etc. for workers.	

User:	London Forum of Amenity and Civic Societies

Policy E7 is supported but a cross-reference to Policy for ‘Agents of Change’ Policy D12, as in Policy E5, should be added.

Policy E7 has its sections B duplicated in section C, but with slightly different words. Section C should be deleted. That would require a change also to the references to parts of Policy E7 in paragraph 6.7.2.

Paragraph 6.7.3 suggests mixing industrial and residential on the same site when it is not designated as a SIL or LSIS. London Forum thinks that may result in the industrial use being threatened by closure. There should be a cross reference in paragraph 6.7.3 to the safeguards required that are explained in Policy E5 E.

User: London Assembly Green Party Group

This is a new policy, which overlaps with the housing policies in the way it sets out goals for development around town centres and the overall new direction of London's spatial planning.

E7 C and D set out a new strategic goal of co-location and more mixed-use areas. The policies ask for boroughs to be 'proactive' and work out whether some areas could be intensified to release land without losing industrial floorspace when they are near town centres. Everything must be 'plan-led', which is potentially a positive approach, and some diagrams are included to show examples of how mixed developments could be phased to support industry continuously while intensifying the use of land to allow for new housing.

Overall we welcome these policies, but some changes are needed to make sure that local communities and existing businesses are fully involved, and that separate masterplanning processes are not encouraged to take the place of local development plans.

Similar to the design policies, this section is quite technocratic, and does not include many references to how the local community will be involved in making these plans, as well as existing businesses in the area.

Just because an area is currently industrial land doesn't mean local Neighbourhood Forums shouldn't be working closely with businesses on how to develop it. Camley Street Sustainability Zone is a good example of where an industrial estate has put together a viable plan for intensification, thanks to businesses and local people working together in a Neighbourhood Forum structure.

Another example of local people taking the lead is the amount of thought the two Neighbourhood Forums around the industrial land north of Kentish Town Station (which is a new SAR in the plan) have put in already as to how this area might be developed for the benefit of businesses and the local community. Camden Council is now developing supplementary planning documents and is looking closely at what the forums have proposed as a starting point for this work.

Proposed amendment to E7 (changes highlighted in bold, deletions italic)

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

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

Read more about the Camley Street Sustainability Zone proposals here: http://cssz.london/uncategorized/a-proposed-redevelopment-project-on-the-camley-streetcedar-way-industrial-estate-the-story-so-far/

User:	Watford Borough Council

Support the objective but this will need to be supported by infrastructure investment that would improve connectivity to surrounding economic and housing areas to benefit the wider area.

Suggested change: This would be appropriately addressed in the supporting text to the policy.

User:	Watford Borough Council

Collaborative working should also include boroughs outside of London that contribute towards the wider economic and housing area.

Suggested change: This would be appropriately addressed in the supporting text to the policy.

User: British Retail Consortium

As we suggest in relation to Policy E5 and E6 local councils should consider the merits of retail uses catering to merchants/builders alongside industrial use taking into account local need. There may be opportunities to site some types of retail such as home improvement alongside industrial which would not undermine or compromise the integrity of SILs or LSISs. This type of intensification could be beneficial for residents, local industry and merchants/builders alike. Land in London is constrained and it is short-sighted to only identify opportunities for residential and social infrastructure at industrial sites if for instance bulky goods retail could be incorporated which may free land elsewhere for residential development. This type of development would remain consistent with paragraph E7-E(1) underscoring the importance of no overall net loss of capacity in terms of industrial, storage and warehousing floorspace. Furthermore, it may ease concerns referenced in paragraph E7-E(2) such as enabling access and operations 24-hours/7-days a week.

User: Gazeley UK Ltd.

Gazeley supports the intensified use of industrial land and the introduction of mixed uses providing that the primary industrial uses are not compromised. The industrial uses should remain the primary and prominent use and the introduction of alternative uses must have the ability of being complementary.

Creative and innovative thinking as to how industrial and residential uses can co-exist is to be encouraged but not at the expense of any net loss of industrial floorspace.

User: Mr Daniel Hill

I strongly support the potential role that light industrial uses /of some segment of B1c for (edge of) town centre / high road regeneration is mentioned in E7 but not really explored and I think this will be more important given the sudden recent decline in retail / casual dining - Maplin, Toys ‘r Us, Prezzo, Jamie’s etc all bust or shrinking, an it seems structural. So there’s a growing importance of well-thought-out and well designed B1c, albeit on the workshop / studio end instead of ‘industrial’ end, to sustain diverse town centre economies. The GLA could consider doing a diagram for a town centre like the one on SIL on p251., I feel this issue is rather underplayed, as is the potential contribution of B1a/B1c space in housing renewal areas.

User:	Allies and Morrison

We welcome the requirement for innovative solutions. In practice, there will need to be differentiation between those sites where the intention is to intensify industrial activities (and whether alongside this any other uses can be included) and those sites where the intention is to maintain existing floorspace and add residential.

User: Allies and Morrison

There is a real need for a much more nuanced appreciation of employment uses generally. The national, and by extension the London Region, definition and categorisation of residential uses has rightly developed many layers to recognise of different housing types, sizes and tenures, as well as very specific design considerations relating to housing. The same is needed for employment uses. This is particularly important when considering co-locating industrial uses with residential. Industrial uses range from those which require 24/7 access and operation and often involve noisy or polluting activities through to those that are much easier neighbours for residential uses. Whilst it is true that some industrial uses can be moved to outer parts of London, there are many industrial activities which need to be much more central. As such, planning policy must find a way to better recognise the locational needs of different industrial activities and to differentiate between those that can sit under or next to residential uses and those that need separation. Whilst we recognise the responsibility for a more nuanced land use class order rests at national government level, we would urge the Mayor and the London Plan to do all in their scope to advance this agenda.

At the same time, it is important to recognise that the multi-storey, co-located model cannot be a general solution, not least because the economics of intensifying industrial land vary. Good design is essential for co-location models, to ensure industrial businesses are able to operate unhindered and safely near housing.

User: Tate and Lyle Sugars

- Overall this section is extremely complex and verbose – a rewrite (and the possibly a re- consultation) should be considered to improve its clarity. The intentions of the policy in certain places are unclear.
- We have no opposition to using SIL more intensively. However we are sceptical that much SIL can be sacrificed for residential uses for through the process of intensification.
- We are concerned policy E7 could be interpreted as maintaining incentives for property speculators to continue to purchase SIL land in the hope of eventual residential development. We believe that the London Plan should seek to regularise the SIL market and remove "hope value" from it.
- The tests for "no reasonable prospect" are an excellent addition. However we would suggest that bullet 2 of 6.7.4 is strengthened as follows (amends in **bold**) "the site should have been marketed with appropriate lease terms **at locally benchmarked *industrial* market rents**, and where the premises are derelict or obsolete, offered with the potential for redevelopment to meet the needs of modern industrial users"

User: Home Builders Federation

The policy is unsound because is it unjustified and ineffective.

The concerns we have expressed regarding Policy E4 apply equally to this Policy. The commercial sector is already pursuing intensification of existing sites to meet demand, e.g. Segro are now promoting multi storey warehouses of up to four storeys. We understand that warehouses of up to 14 storeys are being constructed in Asia. Our concern that the aim of this policy to provide mixed-use development on SIL, LSIS and Non Designated Industrial Sites, is that it is unrealistic. Mixed use schemes are unlikely to be pursued at sufficient scale to provide the number of homes the Mayor expects from this source.

We note paragraph 2.50 of the SHLAA 2017. The SHLAA gives a ‘low probability’ rating of:

40% for LSIS sites in a ‘restricted’ borough;

50% for LSIS sites in a ‘limited’ borough;

60% for LSIS sites in a ‘managed’ borough.

Paragraph 2.51 states that a broadly similar approach is taken for Non-Designated Industrial Land except the probability estimate is increased by 5% in the ‘restricted’ and ‘limited’ boroughs.

Needless to say, the SHLAA does not describe to people which boroughs fall within these categories and how this correlates to land supply/housing yield expectations.

Setting to one side the opaqueness of the SHLAA, the discounts are still too generous. In view of the difficulties of developers integrating housing with industrial uses (environmental and health and safety hazards and Agent for Change objectives) the discounts are too generous. It would be safer to assume that no more than 20% of these sites (LSIS and Non Designated) will ever be developed for mixed-use, and even this 20% seems very generous to us.

Moreover, these are merely estimates based on hypothetical assumptions by the GLA. Such estimates should not take the place of rigorous housing land supply assessments as part of the preparation of a sound Local Plan.

The Mayor is wholly unrealistic to expect industrial sites to be re-developed for mixed uses, while also providing the residents with the appropriate environmental, health & safety safeguards, including meeting Agent for Change principles, while also providing 50% affordable housing. Despite the theory, industrial and residential mixed use development is unlikely to be viable, or attractive to purchasers, in practice.

The impact of this policy is likely to be felt most in the Opportunity Areas (OAs) of outer London where the combination of increasing industrial land values and falling residential land values will make mixed-use schemes much less attractive. This will have an adverse consequence for the housing supply estimates from the OAs.

We note figure 6.3. We accept that the illustration in figure 6.3 is ‘simplified’ but we would argue that the assumptions are over simplified to the point of being unrealistic. As a minimum we would expect to see significant evidence that the commercial sector supports this proposal, especially in terms of the near elimination of a B8 yard from the storage and distribution component. (We are really struggling to see how this would be acceptable or safe for residents).

The NPPF requires that Local Plan should be aspirational but they must also be realistic. The Mayor’s industrial-residential mixed use assumptions are unrealistic in this regard.

We consider that all the discounts must be adjusted to a uniform 20%.

Part D

The Mayor is extending his control to the development of Non-Designated Industrial Sites through this draft policy. While we understand the Mayor’s concern to protect industrial sites of all types. Even so such sites will have contributed to a proportion of housing delivery across London in the past decade. This will be reflected in the trend for housing completions across London. If this component of past supply is ‘switched-off’ entirely, this may have a deleterious effect on sustaining housing delivery in London. We think the draft London Plan should allow for more discretion at the local level as the London LPAs may be better placed to assess the need to retain all Non-Designated Industrial Sites. We consider that the assessment of the need for, and allocation of, Non-Designated Industrial Sites for residential or mixed-use development should be a matter for the London LPAs to assess and consider as they prepare their Local Plans. Following an assessment of the need for Non-Designated Industrial Sites, if the LPA considers that it has a surplus of industrial space, and that some sites lend themselves to re-development for another or mixed-use, then they should be able to allocate them for these uses through the Local Plan. To this end, we recommend that Part D is re-drafted to read:

“D Local planning authorities are required to assess locally the need for Non-Designated Industrial Sites through the preparation of their supporting Local Plans. Local planning authorities may choose to redevelop these sites for mixed-use or residential development proposals where: …”

Part E3) is unsound because it is unjustified

It is unreasonable to demand that the industrial, storage and re-distribution uses are completed and operational in advance of any residential component being occupied. Advance sales of residential schemes may well be crucial to the viability of mixed-use schemes and paying the CIL and S106 infrastructure requirements.

Part E3) should be deleted.

User: Home Builders Federation

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User:	Bracknell Forest Council

The intention of Policy E7/F that LPA’s development plans should look at the potential to relocate industrial capacity to neighbouring authorities is noted. While the thrust of the policy is acceptable there is little evidence of the availability of receptor sites to take the displaced industrial capacity. Certainly in this Borough, and probably across much of the Home Counties there is very little land available or suitable for such uses. Therefore while the principle of the policy is acceptable there is concern as to whether it will in fact be implementable.

User: Royal Borough of Kensington and Chelsea

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

The Council supports the Draft London Plan’s intention that mixed use, or residential, development should not be allowed to compromise the continued efficient function of existing commercial uses. This is essential in so far as the ingress of residential uses in a highly built up borough such ours, does not drive out existing business uses. The Council also supports a policy which encourages an intensification of existing industrial uses. However, we do question the practicalities of "*substitution*" or where existing industrial uses may be re-provided outside, to "*locations in the wider region*." The Council is concerned that such an approach may merely fuel the loss of business uses within an inner city location such as the Royal Borough. It is essential that such substitution is not allowed on an ad hoc basis. We are concerned that this appears to be the intention in the Draft London Plan.

User: Battersea Society Planning Comittee

Policy E7 Intensification, co-location and substitution of land for

industry, logistics and services to support London's economic

function ; Policy SD5 Offices, other strategic functions and residential

development in the CAZ

We welcome the objective in **Policy E5 for** retaining SILs. However we are concerned that Policy E7 which supports intensification through delivery of residential and other uses in SILs could severely affect the nature and level of employment in the Queenstown Road SIL where pressure from residential development is high. This is one of the few remaining areas for small and mixed businesses serving the opportunity area and the rest of CAZ. We therefore consider that **Policy SD5** needs to be applied sensitively in this area and we would hope that the employment capacity in Battersea is not reduced by substitution of business use for residential.

While we are not opposed to intensification of employment areas it must be set in a wider local context of proper internal road access, delivery and parking provision linked to external major routes and public transport

User: London Borough of Islington

Draft London Plan Policy

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

Islington Response

The policy advises that development plans and proposals should be proactive and encourage the intensification of business uses in Use Classes B1c, B2 and B8. Islington's Employment Land Study forecasts that approximately 3,200 jobs occupying industrial land will be lost over the period 2014 - 20366, this equates to approximately 90,000 sqm. This figure is broadly compatible with the Borough's current industrial land release benchmark figure; 5ha over the period 2011 – 2031, as set out in the London Industrial Land Supply and Economy Study7. E7(A) identifies potential options for intensification, which includes development of multi-storey schemes and the addition of basements. While we broadly support such options, there should be a caveat noting that height increases or basement expansion will be subject to other relevant plan policies.

Regarding the LSIS, the policy advises that Development Plans and planning frameworks should be proactive and consider whether certain LSIS functions could be intensified and / or co-located with residential and other uses. Islington's Employment Land Study recommends that the review of the Local Plan should include policies which protect and nurture a range of businesses in the Vale Royal / Brewery Road LSIS. Opportunities for intensification of business uses in this area are being explored in line with recommendations set out in the Employment Land Study, and as advised in Part C of the draft London Plan policy. With regard to co-location with residential, we remain sceptical about the degree to which residential can co-exist with industrial uses without compromising the ongoing function of industrial areas. We note (and support) that the policy proposes that co-location is done through the plan process and not ad hoc planning applications.

As noted above, non-designated industrial sites are no longer conferred with any protection in the London Plan. While some of the criterions in Part D are robust, others are easier to address and could lead to loss of local industrial sites with little evidence. We consider that D(1) and D(2) should both apply to proposals, and then an applicant can choose to comply with either D(3) or D(4). Separate to this issue we consider the criterion in Part D are missing the consideration of contaminated land on health and wider environmental impacts. The issue has been identified in the relevant health and environmental risks identified in the Integrated Impact Assessment (IIA) Scoping Report and have not been carried forward into the formation of policies in the draft new London Plan and are particularly relevant to the redevelopment of industrial land.

In Part E, the clear priority should be for an increase in space unless it can be justified why this is not appropriate/feasible/possible. By referencing the potential for no net loss, the policy sets a lower bar.

Part F should recognise that there are some types of industrial capacity, in particular ‘last-mile’ facilities, that are unsuitable for substitution. In terms of Part F(2), substitution will in all cases lead to increased congestion, pollution and vehicle miles where central London facilities are substituted to Outer London and beyond.

User:	Telford Homes Plc

Telford Homes support mixed use development including the co-location of industrial uses. However, the ‘no overall net loss’ of industrial floorspace through re-development should be re-considered. Such sites that could suit mixed use development maybe hindered by the need for like-for-like replacement of industrial floor space. For example, some industrial sites often house large factories/warehouses, where it would be difficult to re-provide and still accommodate meaningful residential development. The employment sector has developed whereby greater number of jobs can be provided for in less space and therefore providing a better balance of employment and residential. The floorspace test should there be omitted from Policy E7.

User: Port of London Authority

Whilst intensification is supported by the PLA, this should not always be related to areas being intensified to allow for the release of industrial land. The intensification of industrial land should be strongly supported and encouraged even in areas that do not result in the loss of industrial land for other uses (such as housing).

Part E1 of the policy must be made stronger by removing the words "*or at least no overall net loss*". If this wording was to remain in the policy, it is highly likely that most developments relating to the intensification and release of industrial land will always be done to no overall net loss, rather than an increase of overall capacity which must be the policies principle aim.

The PLA broadly agrees with part E4 of the policy which details appropriate design mitigation regarding any residential elements of a proposed development.

Whilst the PLA has no in principle objection to the substitution of London's industrial capacity to locations in the wider region in appropriate circumstances, this would not be appropriate for London's Safeguarded

Wharves. A network of wharves is needed throughout London to enable the use of the river for the transportation of waterborne freight and recognised within policy SI15. The 2013 Wharves Review was undertaken on the basis of three sub regions: West, North East and South East and paragraph 9.1.5.7 of the Draft London Plan sets out the now well established factors to consider when assessing the viability of a Safeguarded Wharf. This includes "*its geographical location, in terms of proximity and connections to existing and potential market areas."* It should therefore be made clear that substitution outside of London does not apply to Safeguarded Wharves.

The PLA therefore recommend the following amendments to policy E7 and the reasoned justification:

Suggested amendments to E7 Part E1:

"the industrial uses within the SIL or LSIS are intensified to deliver an increase ~~(or at least no overall net loss)~~ of capacity in terms of industrial, storage and warehousing floorspace with appropriate provision of yard space for servicing."

Suggested amendment to explanatory text at paragraph 6.7.5:

“There is a significant amount of industrial and logistics capacity serving London that is located outside of the capital. There may be scope for some substitution of London’s industrial capacity to locations in the wider region where this results in mutual advantage, such as complementary business opportunities and transport infrastructure improvements. This will require close collaboration between planning authorities inside and outside London and must ensure that any substitution does not give rise to cumulative negative impacts including, for example, on business supply chains, labour markets, pollution and congestion. ***Safeguarded Wharves are not considered appropriate for substitution outside of the capital, due to the established locational factors that define why these sites are safeguarded in London****.”*

User: PPHE Hotels Group

Policy E7 outlines that Development Plans and planning frameworks should be proactive and consider, in collaboration with the Mayor, whether certain logistics, industrial and related functions in selected parts of SILs could be intensified. Intensification should facilitate the consolidation of the identified SIL to support the delivery of residential and other uses, such as social infrastructure, or to contribute to town centre renewal.

PPHE is supportive of this and agree that parts of SILs could be intensified to support the delivery of residential and other uses (including leisure) that will help contribute to the area, particularly in gateway locations. We strongly believe that SIL can be intensified on sites with additional non SIL uses without compromising the continued efficient function, access, service arrangements and days/hours of operation. The policy restricts this intensification via Development plans and frameworks, however it is our view that on some occasions it would be more expedient to allow this via the planning application process.

User: Galliard Homes

Galliard agrees with Policy E7 – Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function, part E in that a respective local authority's Development Plan or a Masterplan-led approach, in collaboration with the LPA, for a mixed-use redevelopment near a train station that promotes higherdensity intensification is a practical and responsive approach to tackle redevelopment. Such proposals should be supported by the GLA, where the respective LPA fully supports the proposals. The GLA's collaboration shouldn't be essential to secure meaningful intensification. Ultimately, the strategic function of the GLA isn't to manage local authorities industrial portfolios, but to give them the tools to manage it themselves mindful of both the strategic and local needs, relative to each site.
Part E prioritises `dirty' industrial uses and shows no flexibility towards other industrial uses, such as the `creative industries'. We do not argue with the fact that industrial, storage and warehousing is needed within the capital to meet the needs of wider distribution and `final mile' services. However, not every SIL or LSIS is appropriate for these uses, as the consideration of appropriateness reaches much further than `because it's already an industrial use'. Local constraints and opportunities, historic use / access / servicing, road connections, market demand, etc needs full consideration when promoting retention, designation or intensification of industrial uses.

Galliard supports the role of co-locating industrial and residential uses to provide honest intensification opportunities around the capital. However, we feel that this policy, along with Policy E6, fails to consider other practical and commercial implications and is crying out for a test case or exemplar to help demonstrate if such a design philosophy can co-exist when considering all the moving parts – design, construction, phasing, agent of change, management, funding, mortgages, sales, occupancy, public benefits, etc. We feel that greater collaboration between the GLA, an LPA and applicant on one or two sites could work on a deliverable and practicable solution; to help inform this policy aspiration. Until the practicalities of such a provision are understood, the Policy needs to be less prescriptive and more flexible to ensure positive cohesion between uses, let alone the wider built environment.

User:	South East Strategic Leaders

The desire of any local authorities and communities in the wider South East to accept some of London’s industrial capacity or activities must to explored, with proper consideration of the potential impacts in both London and the communities outside London. It is not clear, at this stage, that there is any interest from communities, businesses and authorities outside London to such an approach.

User: Freight Transport Association

Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function page 246

Intensification

Again, there is too strong a focus on intensification. This approach does not work for many logistics operations. However, there may be opportunities here for other industrial uses and there should be clear examples and case studies of where this works and where is it less appropriate.

Co-location

Where there are mixed use developments, they need to be industrial developer-led and not residential developer-led. Otherwise residential developers tend to come up with inappropriate solutions for industry which remain vacant and are then reallocated for residential, creating a loss of industrial use. In terms of mixed use, to support good growth, the plan needs to be specific about which uses can be co-located and which cannot. There are uses other than residential that work better for co-location with logistics, such as business parks.

Substitution Land will always have a higher value for residential over industrial/logistics uses, therefore it is important that all avenues are explored before any release for other purposes.

User:	London Borough of Barnet

Barnet has lost a significant amount of employment space to residential uses in recent years, largely precipitated by changes to the Use Classes Order. It is therefore particularly important that the London Plan recognises the economic potential in, and importance of, encouraging commercial growth in key Outer London locations. Our recent Employment Land Review highlighted that Local Plan policy should encourage investment in our LSIS as a source of supply of small units with intensification and a mix of commercial uses encouraged, New stock is likely to use land more intensively and to provide more flexible space that is appropriate to modern business processes. Our Local Plan will consider a move towards encouraging the development of hybrid space (or the hybridisation of existing space) whilst inconsistent with its nominal intended use (from a market or planning use class point of view) may be the most effective way of ensuring that at least some employment land stays in employment uses, rather than rigidly sticking to use class-based conventions the value for which will not support redevelopment in a reasonably foreseeable time frame. However, the relaxation of PDR complicates the encouragement of greater flexibility in responding to market change. Whilst welcoming the recognition of Strategic Outer London Development Centres at Policy E8G which seeks to support the growth of economic opportunities beyond central London we are disappointed at the lack of strategic direction in the DLP with regard to such locations. Hardly any Outer London locations of greater than sub-regional importance including Brent Cross Cricklewood are identified in the Policy or supporting text

User: London Assembly Labour Group

Suggested changes

The aspiration is undermined by the large-scale potential loss of non-designated industrial sites
The driver for the policy appears to be the release of some land for residential use, rather than increasing the capacity of industrial accommodation and maintaining the function of existing industrial uses
The policy needs to differentiate between intensification (through mixed use including residential) and intensification of industrial uses (via multi-storey etc).
There is no evidence of the viability and deliverability of the intensification policy.
There is a lack of clarity around floor space/yard space in both Policy E4 and E7

the policy of substitution should be a separate policy, with a clearly defined strategy requiring collaborative working.

User:	Anthology

Anthology is not convinced that co-location of housing with industry **(Policy E7)** and warehousing is likely to deliver sufficient housing and could produce housing of an unsatisfactory quality for older and larger housing groups. We accept it may be more appropriate for Private Rented Sector housing for younger target housing groups.

Our land modelling confirms the above concerns. We would be happy to share this with the GLA.

User:	London Waste and Recycling Board (LWARB)

We support policy E7 – Intensification, co-location and substitution of land for industry, logistics, and services to support London’s economic function. However we would stress that this needs to ensure adequate space for waste and material reuse infrastructure

User: London Borough of Lambeth

Lambeth supports the overall approach and agrees with its ‘retain’ classification. In practice it has been very difficult to retain industrial capacity through the planning system to date, given a perceived inter-changeability of industrial uses and B1a office space. It is hoped that the specific emphasis on industrial capacity defined as specific use classes will assist with this. Clarification of the approach on yardspace (as opposed to floorspace) is also welcome, although this needs to be carried through into the monitoring approach set out in Chapter 12 (reference only to industrial floorspace).

Please could the London Plan clarify whether B1b space for research and development of products and processes is intended to fall within the definition of industrial capacity – some of the supporting evidence suggests that it is, but there is no mention in the Plan itself. In Lambeth’s view, B1b should be included within the definition of ‘industrial’. Some sui generis uses should also be included within the definition of industrial capacity e.g. some waste uses, some operational uses – there is no mention of these in the Plan.

With regard to potential for intensification of industrial land, in Lambeth’s view this should not be considered to mean allowing residential uses within industrial areas on a systematic basis. Historically Lambeth allowed mixed-use areas within some of its LSIS (under the Lambeth UDP 2007) and this resulted in quite a rapid erosion of these designated areas, such that a number have now been de-designated. Lambeth has since removed these mixed-use areas and does not intend to revisit that policy approach.

User: Create Streets

Better Brownfield: How to banish boxland and turn it into popular, mixed-use London-like neighbourhoods and streets without losing jobs or shops

Relevant Policies:

Chapter 1 Planning London's Future (Good Growth Policies) pp.9-26
D1 London's form and characteristics (p.98)
D8 Tall buildings (p.126)
H1 Increasing Housing Supply (p.144)
E5 Strategic Industrial Locations (SIL) (p.239)
E6 Locally Significant Industrial Sites (p.245)
E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function (p.246)

Greater clarity on mixed-use ‘London-like neighbourhoods’ on brownfield sites. Obviously much of the focus of the London Plan is on building on brownfield sites. The London Plan should more clearly aim to develop brownfield and industrial sites into complex ‘London-like’ mixed neighbourhoods. These should be more clearly described and defined so that they can be measured. The tension between the need for ongoing industrial use and the need for more housing should be explicitly referenced in the London Plan with preference for ‘London-like neighbourhoods’ with maintenance of ongoing use and the importance of streets and urban form reflected more clearly in policies GG2, D1, E7 and H1. The policy on Healthy Streets (T2) should also reflect the need for a good urban form, beauty and lack of high rise wind tunnels materially to encourage walkability.

As London grows there will be competing pressures for land. The draft Plan highlights concerns over the loss of commercial space in the capital and its effects on economic prosperity. Policies E5 and E6 offer protection to Strategic Industrial Land and Locally Significant Industrial Sites. The Mayor is right that productive land uses should not be swept aside to make way for sterile dormitory developments. However, there is a danger that borough officers interpret these concerns too narrowly, settling for the safety of the status quo rather than risk creative change. Land use on boxland industrial sites is rarely optimal and we must not waste the potential to combine uses with better design. Boroughs should therefore critically look at all industrial sites, even those that are operational, to determine if a ‘mixed use’ approach is possible. Landowners of industrial and ‘big box’ retail sites must be even more strongly encouraged to come forward with Mayoral support. Policy E7 is useful in this context but should be more ambitious. It also needs far more reference to issues of good growth and urban form.

User: London Tenants Federation

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

We have some concerns that mixing of industrial activities and residential will drive out what are deemed to be 'dirty businesses' and about the potential of increase property values, making it more difficult for some businesses to be able to afford to stay.

User:	London Borough of Haringey

The Council supports the draft Plan proposals to retain industrial floor space within London / Haringey; this is supported by the Council's own evidence. Concern is expressed however about the ability for developments to satisfactorily mitigate noise – see response to Agent of Change D12.

User: RICS

Growing a good economy

Through policies **E4, E5, E6 and E7** the Mayor also states the need to protect and enhance London's existing industrial sites. This is a critical issue for a diverse London economy. One of the drawback members suggested is a reluctance amongst planners and developers to locate light industrial (use class B1) within residential developments, even though it is approved in planning policy. This is due to a negative perception of industrial and lack awareness of the benign nature of light industrial properties. Co-locating light industrial alongside residential would make an excellent contribution to the mayor's goal of creating mixed use spaces and help better focus heavy industrial sites by providing more options for occupiers.

User: London Borough of Barking & Dagenham

We have other concerns. Policy E7 sets out that the intensified industrial, storage and distribution uses are completed and operational in advance of any residential component being occupied and that a development agreement should be secured to ensure this. On top of this there is a requirement for 50% affordable housing.

Whilst laudable, the requirement for the new industrial floorspace to be operational before the residential component is occupied has no regard to how developments are funded and cash-flowed. The proceeds from the residential development will help subsidise the re-provision of the employment floorspace. There is no guarantee that there will be market demand for the new industrial floorspace and funders are unlikely to lend on any development burdened with the uncertainty that until the new industrial floorspace is operational the new homes cannot be occupied.

The 50% affordable housing target for industrial land does not recognise the economics of development in Barking and Dagenham where existing use values for industrial uses are often higher than residential land values. Indeed, the focus on existing use values throughout the plan assumes existing use values are less than the market value, this is often not the case in Barking and Dagenham. Due to lower land values, the likely existence of contamination and the need to re-provide industrial floor space, plus the need to provide new social infrastructure these costs will inevitably cut into affordable contributions.

The combined effect of these three requirements will be to sterilise the borough’s industrial land for the lifetime of the London Plan. Not only has the Mayor maintained the Green Belt he has also introduced a Brown Belt. In fact, under this London Plan it will be easier to justify new homes in the Green Belt than in LSIL or SIL where a 35% not a 50% affordable target applies.

The Council is surprised that whilst policy is onerous on the intensification of release land for non-employment uses, policy is not similarly onerous for applications for employment uses in SIL and LSIL. The Council recently met one of the main providers of B2 and B8 space in London and their view was that it is unlikely that multi-storey B2/B8 buildings and a plot ratio above 0.45 would be viable in East London, east of the north circular. If this is true, then the example provided in Figure 6.3 is not viable in two of the three release boroughs. This is clearly a symptom of an oversupply of industrial land and planning policies which do little to increase commercial floorspace densities in the same way they do residential. Policy E7 is deficient in this respect, it says that development plans and development proposals should be proactive and encourage the intensification of business uses in Use Classes B1c, B2 and B8. However, there is no mechanism to ensure this. The Plan does nothing to force the intensification of SIL and LSIL and allows for the chronic underuse of industrial land in Barking and Dagenham to be maintained whilst at the same time stipulating a fivefold increase in small site developments across the borough's residential areas. The 0.65 plot ratio should be required for part A of policy E7. The plan should make clear that any application for uses B1c, B2 and B8 in SIL and LSIL must achieve at least the London average plot ratio of 0.5 and ideally 0.65.

To incentivise intensification the Council considers that new industrial development in SIL and LSIL should be required to provide a proportion of affordable floorspace proportionate to the level of intensification achieved. Therefore, policy E7 could work in tandem with policy E4. For example, where the plot ratio is less than 0.65 the difference between the proposed ratio and 0.65 should be made up by on-site affordable workspace. Where a plot ratio of 1 is achieved and this is above that borough's average plot ratio there would be no requirement to provide affordable workspace.

Finally, the Council is concerned that the borough's release status does not deliver any advantages and that the Plan needs to more clearly set out what this means in practice.

In summary the Council is deeply concerned by the London Plan's proposed approach to SIL and LSIL and proposes the following changes to policy for Release Borough's:

- Reduce the affordable housing target to 35% for developments in SIL and LSIL within Opportunity Areas
- Remove the requirement of a 0.65 plot ratio when calculating no-net loss of floorspace
- Remove the requirement for the replacement floorspace to be operational before the new homes are occupied
- Place a requirement on new industrial uses to achieve a 0.65 plot ratio and where they do not require the difference to be made up by on-site provision of affordable workspace
- Be more explicit on the role of the London Plan in facilitating substitution in recognition of the important role of the wider south east in serving the London economy

These changes will introduce more flexibility to the London Plan and help offset the fact that the borough will be unable to meet its small sites target which is unachievable. As it stands the London Plan sets an unachievable small site target for Barking and Dagenham and an unworkable release policy for its industrial areas. We would prefer an achievable small sites policy and a workable release policy. Without these changes the borough cannot accept its new housing supply target. The result will be more housing, more affordable housing and more jobs.

The Council would like to invite the relevant GLA to discuss our suggested changes to the draft London Plan industrial release and intensification policies (set out above) as well as discuss the outputs of our commissions; *the Future of Our Local Economy* and *the Future of Our Employment Land*.

User:	Environment Agency
We welcome the reference, at policy point E.4) e), to appropriate design mitigation being considered for air quality issues, where industrial and residential uses are proposed together	

User:	Environment Agency
E7. The policy explanatory text could set out the expectation that such mitigation be assessed and identified at planning application stage, to speed up consideration and development delivery.	

User: London Borough of Lewisham

We are cautiously supportive of E7. We do have examples of where this is already happening such as Thomas Lane Depot in Catford where mezzanine development has led to the intensification of B1 use and allowed the introduction of film/theatre set-building. Although we have a small supply of industrial sites in our borough, we do have other sites where this could be tested, in particular, part Council owned sites where plans are already coming forward.

Further consideration should also be given to:

- How mixed-use development can work alongside heavy industrial uses, particular where those uses are 24/7 operations.
- The need to work with potential commercial occupiers/tenants early in the design process
- The degree to which residential values will be affected as a result.
- The need to ensure access to highways infrastructure. Intensification in areas of the borough which are hard to get to or landlocked would create issues for access, servicing and will result in heavier vehicle movements on quiet roads.
- Providing support to development that reduces floorspace but generates an uplift in jobs.
- How commercial space will need to be designed robustly in order to effectively implement the Agent of Change policy.
- Relocating existing uses, as this usually requires a lot of work.
- The practicalities of commercial being completed and operational prior to any residential. Allowing a proportion of the residential to be occupied ahead of commercial can assist in seeing schemes delivered.
- How a move away from SIL to mixed use employment could promote wider regeneration benefits and improve the quality of the environment.
- How car parking will be dealt with as parking facilities needed for trade collections and deliveries.
- What is the adequate amount of separation between residential and commercial to mitigate against “bad neighbour” impacts.

User: London Borough of Brent

The Council has objected to Brent's identification in Table 6.2 of 'provide capacity'. Notwithstanding this, even if its status was changed to retaining capacity, the Council is currently not convinced that the GLA will provide sufficient flexibility in its approach on this policy. Subject to the GLA having a proportionate and pragmatic approach to considering the opportunities provided by some of the SIL and LSIS in Brent for wider benefits consistent with the Good Growth Principles of the London Plan, the Council supports this policy. The Council considers that such a flexible approach will result in better employment/economic growth outcomes for London and Brent as it will encourage investment in employment floorspace which otherwise, on the basis of past trends, is unlikely to otherwise come forward.

Many employment sites are owned by institutional investors such as pension funds. These owners have many assets including designated greenfield sites elsewhere in the country which are easier to develop and provider lower risk in terms of policy compliance and cost. They have a very long term view of their assets and will be willing to see out a development plan policy period if they consider that in the long term the site would provide better prospects for appreciation in value if it can become available for other purposes in the future. This may well lead to stagnation of employment assets, perpetuating under investment which seems prevalent in much of the stock. As such an incentive may well be required to promote investment, plus added wider benefits consistent with the London Plan, through a pragmatic approach.

User:	London Borough of Bromley

The Draft Local Plan has been prepared in response to the current London Plan and the SPG, including designation of employment areas and identification of appropriate mixes of uses in these areas. This new policy elevates and elaborates upon concepts already outlined in the SPG and is broadly consistent with the Draft Local Plan.

User:	Save Swiss Cottage

Policy E7 Intensification, co-location and substitution of land for industry
logistics and services to support London’s economic function.
We have some concerns that mixing of industrial activities and residential will drive out
what are deemed to be ‘dirty businesses’ and about the potential of increase property values,
making it more difficult for some businesses to be able to afford to stay.

User: London Councils

The objectives of this policy can be supported. The intensification and colocation of uses on industrial sites is method of increasing housing supply and protecting employment space can be explored further in London. Boroughs should assess each application for intensification and colocation on sites on individual merits and set proactive policy which will enable development where suitable. Policy that ensure that there is no overall net loss of industrial floor space in the intensification or colocation of development Strategic Infrastructure Locations or Local Strategic Infrastructure sits is important in protecting industrial uses and is welcomed by boroughs.

However, the requirement for replacement industrial, storage and distribution uses to be operational in advance of any residential component being occupied may harm the delivery of large sites. These are likely to be delivered in phases due to site and market constraints and we therefore suggest the wording of the policy could be made more flexible to avoid this unintended outcome.

We support the Mayor’s commitment to preserve industrial space, but boroughs should have the flexibility to recognise potential long term changes in manufacturing and production methods. Intensification of space may in future require different kinds of spaces to be developed, and possibly in some areas less space will be needed. The policy should have the flexibility to recognise this.

The proposal that development plans and planning frameworks should consider collaboration with neighbouring authorities within and outside London, if used appropriately, could help areas take a more flexible approach to industrial space that more closely meets local needs.

User: London Borough of Tower Hamlets

We support this policy in general, although further work is needed regarding development plan points (part F). We would also welcome more guidance regarding the approach to intensification of industrial land.

We also have local experience of the intensification of industrial space and co-location of housing which has resulted in challenges for residents. Further guidance is required on ensuring residential developments within industrial designations are high quality living environments and that sufficient management is in place to resolve problems following occupation. A recognition of these challenges should be reflected in this policy.

User:	Royal Borough of Kingston

RBK agrees that any loss of employment land should come through as part of a plan-led approach and not through ad-hoc applications. However, residential use should not be included as one of the potential uses for intensification unless there is a planned release as set out in the London Plan. Intensification for other uses are supported except where this can hinder legitimate industrial activity. RBK seeks assurances that sufficient industrial land is protected for current use and future growth, including logistics and distribution to support transport objectives such as freight consolidation, green industries, maker-space and relevant creative industries. For this reason, it is considered that the total land should be protected, not the current capacity which fails to support future growth. RBK supports the deletion of the sub-categories of SIL (**Policy E5**), given that it can add much needed flexibility of uses in these locations and will better allow increases in job density and co-location of different employment uses.

User: London Borough of Waltham Forest

We welcome the recognition of the important role industrial land plays in London's economy; particularly in East London and Outer London.

We support the Mayor's position that there should be no net loss of industrial floorspace capacity in the borough, set out in policy E4 Part C, Figure 6.1 and Table 6.2.

We agree with Policy E4 Part G and have already introduced Article 4 Directions preventing permitted development rights for the change of use from light industrial B1 (C) to residential C3.

We agree with policy E5 part A. We recently commissioned Regeneris Consulting to undertake a Business Audit of our Strategic Industrial Locations and our Borough Employment Areas to see how these could best be proactively managed to sustain them; including what could be achieved through the plan-led process but also through business and regeneration support.

We agree with Policy E5 part D. We are producing an Employment Strategy to underpin our Local Plan and part of this process will be considering if we need to consolidate any of our SIL; particularly in the context of Part E of the same policy.

We support limited release of industrial land as long as there is no net loss of industrial floorspace and are considering options to deliver this within Lea Bridge and Leyton, our key growth area. We are aligned with Policy E7 part A. As a borough with limited land resource and a high housing target and need, we are exploring how and where we can deliver intensification. At present, we are working on two sites to see if this could work. The first site is Low Hall Depot, where we have commissioned work on the feasibility of stacking different uses with industrial. The second site is Rigg Approach, where we are working with the GLA Regeneration Team to see if intensification could work whilst retaining the existing employment floor space. If feasible these will be included as policies within our new Local Plan.

The resource implications of delivering this work across planning, regeneration and business teams need to be recognised, and where possible the Mayor should provide funding and resource to assist in the delivery of proposals for intensification and retention of employment land.

User: London Borough of Hillingdon

The policy seeks to encourage the intensification of industrial activities and the co-location of residential and industrial uses. Whilst the proposed approach may be successful in some instances, industrial uses are rarely compatible with residential development.

The Council is concerned that the proposed approach could lead to highly complex, customised development schemes that do not have in-built flexibility to meet the needs of future occupiers. Once the applicant vacates the site, the vacant space must be able to meet the needs of the wider market. The Council is of the view that as currently worded, the policy is far too complex and provides limited scope for boroughs to develop their own guidance. A two page policy does not provide a strategic framework on this matter.

User: HFFTRA

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

We have some concerns that mixing of industrial activities and residential will drive out what are deemed to be 'dirty businesses' and about the potential of increase property values, making it more difficult for some businesses to be able to afford to stay.

User: London Borough of Merton

Support with amendments While the principle of supporting a dynamic and thriving economy, businesses and jobs is fully supported, there are tensions between these four policies and also with the overall strategy set out for Opportunity Areas in Wimbledon, elsewhere in the Wandle Valley and the Trams Triangle intensification.

The approach set out on industrial land consolidation in E7 with diagrams at Figure 6.3 seems that it will apply in very specific circumstances: for example where industrial land is very valuable and sought after and cannot be sought elsewhere (e.g. beside a major port or major airport). Most industrial land in the Wandle Valley is not like that. The South London Partnership has identified South Wimbledon Business Area and Willow Lane (both SILs and Business Improvement Districts) as being the highest value, highest demand business areas across five boroughs in South London. Even with this, investment in a multi storey B8
warehouse is (a) very unlikely to be viable in these locations, especially when taking account of the requirements set out in Policy E7 1-4 and all connected policies and (b) very unlikely to deliver the business space and jobs that London needs. It seems that collectively these policies are taking an academic approach that may work in specific parts of London (e.g. near airports, ports and motorway corridors) and trying to apply it across the whole of Greater London.

Part of the areas within the Tram Triangle and Opportunity Areas within Wimbledon are designated industrial areas (SIL and LSIS) . We welcome the opportunity to explore making more effective use of land as set out in policy E5 (b)(3) but we consider that it should not be conditional on the approach set out in policy E7. In some cases, land along the Wandle Valley was in historic industrial use and has an industrial use on a specific site that would be unlikely to ever be applied in a modern planning system (for example, the site is in heavy industrial use but for historic reasons is sited beside the river Wandle on residential roads, adjacent schools, homes, nature areas) When this industrial usage ceases, it is reasonable for all appropriate uses to be explored, including for social infrastructure, workspace and homes. Policies on the Tram Triangle, reuse of brownfield land, environmental improvements, modal shift, improving air quality, reducing noise pollution and developing Opportunity Areas support this approach but the series of policies E2-E7 do not allow for this.

Our view is that there is scope for some intensification of business areas – whether designated or undesignated – alongside community or residential use, particularly where these are in retail warehouse use currently. We would welcome a rationalisation of these policies, to focus on the laudable and fully supported aim of supporting London’s economy and jobs, rather than the extensive detail and prescriptive requirements that they set out.

User: AECOM

Our thoughts:

London's previous approach has been to deliver new homes on vacant industrial land. This has resulted in an over-release (circa 100 ha per annum over 5 years), despite increasingly strong demand. This **risks** future economic competitiveness.

Land values create a dichotomy, in which the importance of industrial land competes against higher residential development values. The Draft London Plan's response of no net loss of floorspace recognises a **changed approach** from land to floorspace capacity.

Delivery and viability will be challenging, however this approach offers an opportunity for creative **co-location and intensification** of industry and other uses.

How Can AECOM Help?

AECOM's pan-London experience provides us a unique understanding of the need to provide homes without undermining vital industrial and logistical functions.

AECOM prepared the London Industrial Land Supply and Economy Study (2015), informing this London Plan, which positions us to identify opportunities both in plan preparation and development needs, that coincide with the City for All Londoner's vision embodied within the new plan.

User: London Borough of Hackney

Hackney supports the policy approach indicated for SIL and LSIS which encourage the intensification and more efficient use of industrial land within these designations. However the policy provisions as worded regarding Non-designated Industrial Sites is not supported as it undermines Hackney's current and emerging policy approach to the protection and provision of employment and industrial foorspace. As such these provisions should not apply to locally designated employment/industrial areas. Most of the boroughs industrial capacity falls within locally designated Priority Employment Areas (PEAs) or nondesignated sites. In accordance with adopted policy, where a site is redeveloped within designated PEAs any new development must be employment-led.

The Hackney Local Plan 2033 reclassifies PEAs into Priority Office Areas and Priority Industrial Areas in response to the findings of Hackney's Employment Land Study. The Plan adopts a more rigorous approach to industrial land management, protecting and intensifying industrial land and floorspace within designated Priority Industrial Areas (PIAs).

Within PIAs:
New development or redevelopment of sites within Priority Industrial Areas will only be permitted if they:
i. maintain, re-provide the same quantum or intensify existing industrial uses (B1c, B2, B8); and
ii. Maintain or re-provide equivalent employment floorspace within existing B1a Use Class or significantly increase job densities within B Use Classes.

Based on the current wording of E7, the boroughs existing Priority Employment Areas and proposed Priority Industrial Areas would fall within the non-Designated industrial sites category and as such provision E7(D) of the policy would apply. Provisions D1 and D4 in particular would impact on the ability of the sites to deliver employment-led schemes and could enable the loss of industrial capacity in these local designations. We welcome further discussion with GLA officers to develop a policy approach that is appropriate for locally designated employment/industrial areas to ensure the industrial capacity within these designated areas is carefully managed.

User:	London Borough of Hounslow

LB Hounslow strongly supports policies E5-E8 in unlocking redevelopment of industrial areas, but these policies should make clearer reference linking improved public transport accessibility levels with potential for development. This is principally due to the fact many larger industrial locations are often particularly poorly served by frequent commuter services.

LB Hounslow supports this policy see above

User:	Westminster City Council

This extremely detailed policy will not be relevant in boroughs like Westminster and this should be reflected in the language used. Much of the detail belongs more properly to supplementary guidance in any event.

User: Chelmsford City Council

CCC welcomes the Plan's positive approach to supporting the projected growth of all sectors of London's economy.

It is noted that in respect to industrial land, Policy E7 encourages Boroughs to consider, in addition to intensification and co-location, the substitution of some of London's industrial capacity elsewhere in London and beyond London's boundary. This is subject to it being mutually advantageous and full regard being given to the positive and negative impacts of substitution.

CCC welcomes the investment of high quality employers who will positively contribute to the Borough's economy. However, the Plan is unclear on what industrial uses it considers may be more appropriately located outside of London so authorities in the WSE can understand what collaboration opportunities may be available. Also, it is questioned whether substitution arrangements will place additional pressure on WSE authorities to increase housing supply to meet job demand not previously identified in Objectively Assessed Need Assessments.

User: London Borough of Southwark

The council agrees in principle to the plan-led approach to SIL intensification and to retain industrial capacity. The council also supports collaboration with neighbouring authorities relating to sub-regional and regional industrial property markets. Southwark Council is currently working with Lewisham Council and has explored opportunities further afield with the GLA relating to industrial relocation strategies for such uses that do not need to be prioritised in the Central Services Area but do need to be accommodated in Greater London.

It is requested the policy also recognise the range of employment functions required in the Central Services Area that will also need to be accommodated in central opportunity areas such as the Old Kent Road. The OA is located in the CAZ fringe and will be located close to strategic transport infrastructure when the Bakerloo line extension is complete. As such a wider range of employment opportunities will be provided for ranging from industrial uses to offices. There is already a range of uses in SIL Area 1 including creative industries, offices and manufacturing reflecting the diverse range of industrial and employment uses in this location. It is considered the innovative approaches to mixed use development to support and grow this diverse range of uses should also be provided for within the policy. Regarding Part E3, it may not always be possible to ensure industrial uses are operational prior to residential uses. The policy wording should reflect this reality.

The illustrations in Figure 6.3 are useful in explaining the approach to SIL consolidation. However it is considered difficult to ensure that this process could be achieved in the Old Kent Road (Area 1) due to complex land ownerships and phasing of development. The council considers figure 6.3 could be improved to clarify that the functionality of existing B8 servicing yards must be retained (where they currently serve adjacent B8 premises and are integral to the B8 premises functioning) where new ‘multi-storey’ B8 yards units are provided. The figure as currently presented implies the servicing yard for adjoining B8 units could be lost. The policy should encourage a comprehensive approach to redevelopment of such sites that would consider appropriate phasing and ensure the opportunities to secure the ongoing operation of occupiers are maximised.

A wider collaborative approach is required in relation to industrial uses, intensification and relocation; however there are some areas the council is actively pursuing for this purpose in Area 1, including South Bermondsey proposed retained SIL. The AAP/OAPF demands a complex mix of uses at high densities to promote confidence in and achieve the aims of the opportunity area framework including attracting major transport infrastructure in the Bakerloo Line extension. These significant and ambitious proposals for central London, including the incorporation of innovative mixing of industrial uses with residential uses, goes beyond the core requirements of SIL and this approach should be recognised and supported in the policies.

Regarding E7 E 3 (which states that “the intensified industrial, storage and distribution uses are completed and operational in advance of any residential component being occupied”) the council is concerned it would deter funders from investing in what are likely to be complex, innovative and expensive developments. Developers will need to generate cash flow as early as possible rather than being at significant financial risk to a third party commercial agreement. Given the significant physical and cost investments that this kind of mixed use will require it would seem highly unlikely that units would be left purposefully empty. The policy in effect creates a ransom position for would be commercial occupiers.

User:	London Borough of Redbridge

The Council is concerned about the implications of this policy in regards to the design and amenity implications for residential development, in addition to its accessibility to nearby neighbourhood facilities, given the nature of SIL within Redbridge. It would prefer to match the release of smaller industrial sites for housing with a corresponding intensification of its preferred SIL.

User: London Borough of Wandsworth

The overall approach is welcomed notwithstanding comments on intensification within the SIL. The Local Plan – Employment and Industry sets out an approach to protecting non designated industrial sites (Employment Protection Areas) where they are in appropriate locations and form a cluster which enables benefits from agglomeration effects, supplying each other and realising economies of scale for servicing and other operational requirements. Protection of nondesignated
sites is supported where it is evidenced that
there is continuing demand. In Wandsworth, the continued demand for industrial premises, and the limitations on supply of industrial land require protection of smaller industrial areas and premises, including businesses located within railway arches along side the main strategic reservoir of industrial land. The Council would emphasise the importance of an up to date evidence base to determine the level of flexibility of uses within SILS and LSIS to enable a local evidence based approach to be applied.

User:	Suffolk County Council

Policies within the draft London Plan (E5, E7 and E8) refer to the potential of relocating some employment to the Wider South East Region and collaborative working with authorities outside London on this matter. At the Wider South East Summit, the Mayor referred the Royal Opera House's linkage to Thurrock and the Deputy Mayor agreed to joint research on the location of firms. Councils in Suffolk welcome the recognition of the wider economic aspects and that London's policy and evidence base reflects on the office and industrial markets in the Wider South East.

User: London Borough of Harrow

The Council supports the inclusion of the Agent of Change policy.

The Council is however concerned about the ability for developments to satisfactorily mitigate noise in relation to policy E7 which seeks to intensify existing industrial estates/mixed uses etc. Even in the event that the proposed new development (being a sensitive receiving environment) may have measures in place, there is concern that this maybe insufficient to provide future users of an industrial park/site confidence to take up a lease/purchase the property. It is considered that agent of change should assume worst case scenario / impact i.e. B2 rather than for example, current B8.

Whilst many buildings are able to incorporate further materials into the built fabric, this can end up having an impact on viability, which leads to potentially fewer contributions such as affordable housing.

The Agent of Change policy focuses on building measures (layout / materials etc) that can be implemented to address reverse amenity impacts. However, it is difficult to achieve suitable outlook and noise mitigation for outdoor amenity space, which is critical to achieving good quality homes and conflicts with D4 Housing Quality and Standards paragraph 3.4.11.

User: Royal Borough of Greenwich

We fully support the recognition of the role and priority afforded to the provision of both low cost business space and affordable workspace. We agree with the categorisation of Royal Greenwich as a ‘retain capacity’ borough for the purposes of managing industrial floorspace capacity. While we areWe fully support the recognition of the role and priority afforded to the provision of both low cost business space and affordable workspace. We agree with the categorisation of Royal Greenwich as a ‘retain capacity’ borough for the purposes of managing industrial floorspace capacity. While we are supportive of the principles underpinning Policy E7 (Intensification, co-location and substitution of land for industry, logistics and services to support London’s economic function), as currently drafted the policy and supporting text is not sufficiently clear to enable effective implementation of the approach.

Without clarification, Policy E7 will not be effective in terms of providing the necessary industrial capacity across London to meet identified need and if not done properly may erode industrial capacity. It must be clear that intensification of designated industrial land (especially SIL) is a strategic priority in and of itself, rather than being encouraged as a means to transfer currently designated land to other non-industrial uses. It also needs to be clearer that it is the boroughs, in partnership with the Mayor, who are responsible for the leading role in identifying where there is scope for SIL/LSIS consolidation as a means of achieving strategic plan objectives.

User: London Borough of Richmond Upon Thames

In Richmond upon Thames, the continued demand for industrial premises, and the limitations on supply of industrial land, requires protection of smaller industrial areas and premises, including businesses located within railway arches or dotted among residential and mixed use areas. The Council would prefer a local evidence based approach to be applied. The London Plan is too accommodating in paragraph 6.7.3 by allowing housing provision, outside designated SILs and LSIS where a mix of residential and industrial on the same site may occur. In spite of the Agent for Change principle, there is likely to be conflict between employment and residential uses and there is no suitable available land to which to relocate any affected business /operations. Mixeduse

and residential development

should not be supported on existing industrial sites, except in exceptional cases and where they meet the criteria in D. and E.2 to E.4 of Policy E7.

User: London Borough of Harrow

The Council supports the draft Plan proposals to retain industrial floor space within London / Harrow; this is supported by the Council's own evidence. The Council however has concerns about the practicalities and for feasibility of seeking to achieve housing on industrial land by intensifying the use of industrial land in order to free some of it up for housing. These concerns are two-fold - namely the practicality of co-locating residential and industrial uses. In many instances, such an approach will result in relatively benign industrial uses (i.e. storage) being delivered in order to address reverse amenity impacts of introducing residential to the area.

Residential development will most likely preclude B2 General industrial. Secondly, from a Harrow perspective, much of our industrial land is on small estates with relatively poor access to the strategic transport network, reducing the likelihood of industrial intensification being attractive to developers and able to be achieved to an acceptable design standard. There are also general concerns about the financial feasibility of new build industrial development within the borough, as our rental levels are relatively low as our sites do not meet contemporary needs (size, quality, format of provision and access to strategic transport networks).

User: Royal Borough of Greenwich

While RBG supports the principles underlying this policy, as currently drafted it is not sufficiently clear. While E7B and E7C clearly state that the process of SIL/LSIS intensification and consolidation to support the delivery of residential and other uses should be plan-led and not considered through ad hoc planning applications, para 6.7.2 refers to the need to have a development agreement in place between a residential and industrial developer to support the transfer of land.
The supporting text needs revising to clarify that it is the boroughs, in partnership with the Mayor, who are responsible for identifying where there is scope for SIL/LSIS consolidation as a means of achieving strategic plan objectives. As opposed to developers/landowners seeking to promote transfer of land, simply because a development agreement is in place. Additionally, it should be further emphasized in the policy that the strategic priority for industrial land (especially SIL) is its intensification for industrial use. The current wording suggests that intensification is primarily encouraged as a means to transfer to other non-industrial uses, as opposed to a priority objective in itself.

User:	Royal Borough of Greenwich
In common with E2, the requirement to demonstrate ‘no reasonable prospect’ should include a specified length of time for marketing of the site, and where appropriate be marketed for sale as opposed to lease only.	

User:	London Borough of Enfield

Policy E7 ‘Intensification, co-location and substitution of land for industry, logistics and services to support London’ is contradictory and simplistic. As mentioned before, it only supports intensification of industrial uses within SIL. If the GLA wishes to see good growth in the ULV corridor, then SIL policy will have to be relaxed and it must allow for co-location of mixed land uses. A policy similar to LSIS policy should be written.

User: London First

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

In respect of intensification and co-location, we welcome the overarching principle of the policy – to encourage more efficient use of land in employment areas to enable land release for uses. The intensification of use of existing industrial and logistics sites is dependent on multi-storey industrial development or the inclusion of mezzanine floors and basements. Whilst we welcome the encouragement of innovation in industrial and logistics development, and multi-storey development in particular, we are concerned that the policy's principles are as yet untested in London both from a development and an occupier/operator perspective, and are unlikely to be achievable on all sites for various reasons such as development viability, site size and layout, and development constraints. The GLA should undertake more work on these issues and clarify before the Examination in Public how and where intensified industrial uses can be viably delivered.

The Plan should allow boroughs to identify new industrial sites in appropriate locations such as near arterial routes, adjacent to rail, air and water interchanges, in and around town centres and appropriately sized logistics hubs within OAs. In some circumstances, it may be appropriate to use land-use swaps or bottom-up reviews to release low-grade, previously developed brownfield land, including Green Belt locations, through the local plan process, subject to a robust evidence base. These new sites can then be used to rebalance against any losses of industrial capacity to enable mixed use development including residential to come forward.

User: Berkeley Group

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

Parts B, C and F:
…and not through adhoc(strikethrough) should only be through the planning application process where agreed with the borough and subject to appropriate consultation.

7.13. The requirement to include industrial, storage or distribution floorspace in a mixed use redevelopment might be technically very challenging to achieve, compromising the ability to deliver a high quality and attractive environment, and may also be unviable, especially when coupled with the proposed affordable housing threshold of 50%. The nature, orientation and size of sites will be an important consideration. Whilst some industrial uses may be better suited to co-location than in the past, it is important that the right quality of place and residential environment is created, recognising the needs of the residents as well as the industrial users. When considering the feasibility and appropriateness for the inclusion of industrial floorspace, regard must be had to the quality of the place being created, the direct and opportunity costs of providing industrial floorspace and the need to deliver 65,000 homes a year. The cumulative burden of policy requirements risks making residential/mixed use developments unviable.
D3 industrial, storage or distribution floorspace is provided as part of mixed-use intensification where this is feasible and viable, having regard to the amenity and quality of the place being created, and the overall benefits of the proposal;

7.14. Given the need to make the most efficient use of land, yard space should only be sought where needed, especially as existing yard space may be a reflection of historic under-use of sites, rather than the level of demand:

E1 the industrial uses within the SIL or LSIS are intensified to deliver an increase (or at least no overall net loss) of capacity in terms of industrial, storage and warehousing floorspace with appropriate provision of yard space for servicing if needed.

7.15. Where industrial uses are being re-provided, this should not be subject to a requirement for their re-provision in advance of residential occupations. This might not be possible logistically in terms of phasing and place-creation, and would also have a significant impact on development cash-flow and therefore viability. Forward residential-sales will be important to funding the development:

3) the intensified industrial, storage and distribution uses are completed and operational in advance of any residential component being occupied.(strikethrough)

7.16. It will not always be necessary or desirable for a development agreement to be in place between a residential and industrial developer and the suggestion is inappropriate for a strategic plan. This should be deleted from paragraph 6.7.2.

7.17. The test of ‘no reasonable prospect’ for industrial use of a site (6.7.4) should simply be that the premises have been marketed on reasonable lease terms.

7.18. We support the approach for S106 agreements to enable trainees to complete their training and apprenticeships and for all Londoners to benefit from opportunities, including through cross-borough working (E11). London is highly accessible with many people living in one borough and working in another. This more pragmatic approach will ensure that the best is made of opportunities secured in development.

User: Just Space

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

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

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

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

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

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

The policy of substitution should be a separate policy, with a clearly defined strategy requiring collaborative working. It is not similar to intensification or co-location and only serves to suggest that this is all part of a strategy to facilitate residential development. Perhaps local authorities outside London who are willing to accommodate more industrial uses should be encouraged to do so in order to provide additional industrial capacity (rather than facilitate substitution). Substitution should also be framed as an issue of regional development i.e. a move to offset London-centric growth: it is not just a matter of releasing land within the London's planning sphere to residential. Spreading industrial activity will bring upskilling benefits and other economic reinforcement to receiving areas.

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

Proposed changes

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

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

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

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

User:	TUC London, South East and East of England

Policy E7: Intensification and mixed use industrial sites

1. The commitment to maintain industrial floorspace is very welcome.
2. The commitments to intensity the use of industrial land and to promote mixed development of residential and employment space, using best practice from economies such as the Netherlands, is very welcome. For far too long industrial estates have been ‘no-go-zones’ and their appearance has given a bad image to industry.

User: London Borough of Bexley

Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function is considered to be too long, too detailed and in places unworkable. The policy should be refined to be strategic in nature and subsequent details should be provided in the supporting text or in a supporting SPG.

The main thrust of **Policy E7** is the assumption that intensification and co-location can actually be achieved across the whole of London and that this is desirable. As noted previously, the borough has one of the lowest commercial rent values in London and the Council has strong reservations regarding some of the assumptions on intensification of business uses. Low values do not necessarily support the viability of the intensification options as suggested in **Part A** of **Policy E7**; boroughs should be allowed to define the nature or form of intensification as appropriate to their local areas and economic profile. In doing so, boroughs are enabled to proactively manage growth in its opportunity areas due to the 'no net loss' principle attributed to industrial floor space in the draft Plan. It is noted that the evidence of the concepts of intensification, co-location and relocation in the Mayor's **Industrial Primer** document cover examples primarily in Inner London where values are higher. .

The Council considers that the majority of industrial uses will inevitably clash with residential uses. This compromises the ability of the borough to plan for co-location. **Paragraph 6.5.1**, which is supporting text to **Policy E5**, is in direct contradiction with the Mayor's approach to co-location of employment areas with residential uses set out in **Policy E7**, when it states that:

'*SILs are given strategic protection because they are critical to the effective functioning of London's economy. They can accommodate activities which – by virtue of their scale, noise, odours, dust, emissions, hours of operation and/or vehicular movements – can raise tensions with other land uses and particularly residential development*.'

The Council strongly agrees with this statement and has strong concerns regarding the ostensible contradiction with the Mayor's approach to co-location with residential uses. Indeed, local evidence in the form of an Inspector's decision6 supports the Council's view that in the majority of instances, industrial uses cannot thrive when located alongside residential uses. Proposed residential uses, through their location in close proximity to established businesses would adversely affect the living conditions of future occupiers. Furthermore, the introduction of residential uses within established industrial estates has the distinct potential to adversely affect existing established business uses, which could in the long-term result in the loss of these employment uses. This is contradictory to the purpose of draft Plan **Policies E5** and **E6**. Further local evidence on Bexley's strategic industrial land is set out below.

Crayford Ness Industrial Area accommodates a mix of industrial and storage occupiers, as well as some sui-generis activities, that can largely be characterised as 'bad neighbour uses' that would struggle to find a suitable site elsewhere. These heavy industrial uses generate significant noise and pollution externalities that contribute to a poor environment in the industrial area, whilst the condition of the premises at the site is poor to fair. Manor Road North Industrial Area has reasonable levels of occupancy and use despite the lower grade buildings, while the existing uses at the site do add to the heavy and dirty character of the area. The Wheatley Terrace industrial estate has neighbouring waste recycling activities at the Manor Road North site, which creates air quality and noise issues for the area, and makes future changes of use at the site less suitable. Thames Road Industrial Area contains a waste recycling depot and a scrap metal yard; creating a dirty character of the environment.

While several bus stops are located along the A2016 and within the Crabtree Manorway North Employment Area that provide some bus services to workers in the employment area, for the most part, employment sites in this area have limited public bus services. Together with the large distance of the employment sites to Belvedere train station, the Belvedere Riverside sites can be characterised as relatively isolated and poorly served by public transport, and therefore not suited for co-location, although intensification of this employment area is a possibility through additional connectivity.

Paragraph 6.7.2 reiterates the requirement for industrial sites delivering housing to meet the 50% affordable housing threshold set out in **Paragraph 4.6.6**. As stated in paragraph 4.38 of this response, this requirement makes an assumption about the difference in values between industrial and residential development. In Bexley, the value of land in industrial use in some areas can be equivalent to land in residential use, making a 50% requirement for affordable housing unachievable.

Part E of Policy E7 is poorly written, in that the measures set out in this Part are attempting to address all of the processes in Parts B, C and D. It is unclear which measure relates to which process. For example, London boroughs need to be able to plan for no net less across their plan period, and as such there is a concern in Part E(3) which states that all intensification of industrial areas need to be completed and operational in advance of any residential component. Whilst this may be appropriate for co-location sites, it could be interpreted as a strategic requirement for intensification of all industrial land.

Part F of **Policy E7** requires London boroughs to consider relocation as part of a plan led process of consolidation and intensification. The majority of authorities adjoining Bexley are characterised by significant constraints to employment development in future, and do not have large amounts of employment land available to accommodate growth requirements flowing from the wider South East London/M25 area. Whilst this means they are unlikely to be able to compete to attract investment away from Bexley, they face similar capacity issues with regards to planning for business growth and will continue to face increasing pressures on employment land from higher value uses, most notably residential. The concept of relocation is therefore considered unworkable. It is highly unlikely surrounding authorities will accept Bexley’s industrial uses.

User:	Federation of Small Businesses

Intensification is untested in London and we have concerns that it will not be a viable or commercially sensible solution for securing the industrial and logistics capacity that is needed. The intensification needs to be industrial-led and not residential-led with a clear business case made.

3) Access to multi-story schemes must include appropriate and functional vehicular access for loading and unloading. Where required, large vehicle heights, widths and turning capabilities should be catered for that do not to hinder business operations or cause unnecessary business costs.

User:	Federation of Small Businesses

Where intensification is supported, vehicular access for loading and unloading, should be included in the plans and, where necessary, large vehicle heights, widths and turning capabilities should be catered for that do not hinder business operations or cause unnecessary business costs.

User:	Federation of Small Businesses

This needs to be clearer. Does intensification mean mixed-used development or more intensive use for industrial and logistics use? FSB London would like to see a better definition of this to avoid any misunderstanding during the life time of the plan.

User:	Federation of Small Businesses

Mixed-use or residential development proposals on non-designated Industrial Sites must show that rigorous marketing activity has been tried and failed over a period of time of around 24 months.

Where mixed-use proposals are agreed, delivery and servicing access to the commercial operators on the site should not introduce restrictions that are onerous or to the detriment of the normal business operations of those operators.

User:	Federation of Small Businesses
Additional capacity should be encouraged where possible.	

User:	SEGRO

We are concerned that whilst the London Plan promotes industrial innovation through mixed use and multi-storey, it does nothing to incentivise it. In fact, it adds additional requirements and obligations. Innovation is highly complex, expensive and risky, and so incentives are essential for delivery.

User: SEGRO

Policy E7 Intensification - *Development proposals should be proactive and encourage the intensification of business uses in Use Classes B1c, B2 and B8 with more efficient use of land through higher plot ratios having regard to operational requirements (including servicing). The plan will retain industrial floorspace by a rule of the greater of the current floorspace or a 65% site density*

We have serious concerns about accuracy and relevance of the data the GLA's London Employment Sites Database Report (2016 CAG Consultants), which has been used to calculate the 65% site density. The GLA's evidence base is at odds with SEGRO's experience of developing modern industrial space. Since 2013, SEGRO has built 17 new industrial schemes (100 units) in London totalling 1.6m sq. ft. These schemes have delivered a range of unit sizes from 500 sq. ft. – 150,000 sq. ft. The average footprint and floor area densities of these schemes are 37% and 45% respectively. These figures are noticeably smaller for cross dock facilities that modern delivery companies require, particularly those operating in parcel delivery and retailing.

We recommend that the 65% plot ratio rule is reduced to 45% but also recognises that this figure could change subject to the following:
• Last mile delivery/parcel depots utilising cross docks facilities
• Irregular or constrained plots
• 'Starter' units under 5,000 sq. ft.
• Specific operational needs of occupier for more bespoke facilities driven by changing operational processes, including the development of robotics and automation.

User: SEGRO

Policy E7 Intensification - *The processes set out in Parts B, C and D above must ensure that…..the industrial uses within the SIL or LSIS are intensified to deliver an increase (or at least no overall net loss) of capacity in terms of industrial, storage and warehousing floorspace with appropriate provision of yard space for servicing*

Whilst we recognise the principle of the ‘no net loss’ approach, the draft policy does not take account that many old redundant factories or industrial schemes have incredibly high plot ratios or in some cases are already multi-storey. The former Nestle factory site, for example, includes nearly one million sq. ft. of ‘redundant’ industrial space and was not capable of accommodating the operational needs of an industrial occupier(s). It would have been unviable and, given the site’s location close to residents, inappropriate for us to re-provide this amount of industrial space on site as part of the mixed use scheme that is proposed. We recommend that the policy is applied with flexibility in exceptional circumstances where the existing floorspace no longer meets the operational needs of industrial occupiers.

User: SEGRO

SIL and LSIS Intensification and Consolidation
Industrial intensification essentially describes the process of developing new industrial space at higher densities. In some circumstances, this can have the effect of making more efficient use of land, either for additional industrial capacity to be created, or for other forms of development (principally housing) to come forward.

We support the promotion of more intensive forms of industrial and mixed use development as, in the right circumstances, this process can contribute to the provision of more industrial capacity where land in London is under increasing pressure for development, and where industrial land in particular is threatened by higher value forms of development.
We are developing a range of intensive forms of industrial development across Europe, through the delivery of multi-level industrial schemes. We are looking at ways to deliver on this policy objective on our own sites in London where feasible, and would also be interested in opportunities to partner with the public/private sector to continue to expand delivery of these innovative forms of development. Our work with the GLA as part of the East Plus partnership is a good example of how SEGRO is collaborating with the public sector to deliver high quality industrial space to help meet London's industrial and logistics demands.

For the London Plan to be effective in delivering on its objectives for new jobs, infrastructure, homes etc., it is important that the conditions influencing the delivery of intensive industrial development are fully acknowledged and understood.

Forms of intensification

Policy E7 of the Draft London Plan lists a number of processes which are considered to contribute to industrial intensification:
1. development of mezzanines
2. introduction of small units
3. development of multi-storey schemes
4. addition of basements
5. more efficient use of land through higher plot ratios having regard to operational requirements (including servicing) and mitigating impacts on the transport network where necessary

We have concerns about the above list in terms of the ability of these processes to provide the industrial space which London needs to serve its businesses and populations. As the London Plan is allowing industrial land to be released for alternative high value development where other industrial land is ‘intensified’, it needs to be careful that industrial functions are not being constrained and eroded by the development of compromised industrial space. This approach will not meet the needs of industrial business which are critical to serve London. London Plan policy also needs to ensure that the mechanisms for intensification are in fact deliverable and effective in order to have an impact on the objectives of providing additional industrial capacity in some locations, and intensifying in order to consolidate industrial land designations in others.

The processes identified in Policy E7 (Part A) are considered in this context.

User: SEGRO

The processes identified in Policy E7 (Part A) are considered in this context.

Mezzanines
Mezzanines can be introduced or removed without the need for planning permission, and the presence of mezzanine floors is usually determined by the spatial attributes of an industrial unit and the needs of the business occupying it. Although the use of mezzanines is becoming more popular with e-retailers such as Amazon, it would be inappropriate for mezzanines to be considered as a ‘key’ means to address London’s industrial capacity issues, as capacity would be compromised if the introduction of mezzanines was accepted as a means of facilitating the release of SIL/LSIS land. Of the last 100 industrial units that we have built only two include significant mezzanine floors both of which have been delivered by the occupier and not SEGRO.

These mezzanine floors provide only 4% of additional floorspace over and above the 1.6 million sq. ft. of built space that we have delivered over the last 5 years. For this reason, we propose that the introduction of mezzanine floors in existing buildings should not be considered ‘intensification’ for the purposes of applying the principle ‘no net loss’ of industrial capacity.

User: SEGRO

Small units
We assume from the evidence base work that this means the creation of additional small units through infill and extension works to existing buildings, but the policy wording isn't explicit on this and so should be clarified. Whilst we are not opposed to this form of intensification, the Mayor should acknowledge that such development is unlikely to meaningfully contribute to delivering new industrial capacity. In most cases neither vertical nor horizontal extensions to existing industrial units will be sufficiently viable or feasible, given the operational needs of industrial occupiers.

User: SEGRO

Multi-storey/multi-level development
In the right circumstances, multi-storey industrial developments can provide high quality business space which meets the needs of industrial occupiers that need to operate within the Capital. As a pan-European developer and owner of industrial space, we have experience of delivering such schemes on the Continent and are currently developing two multi-storey facilities – a 150,000 sq. ft. two-storey spiral-ramp warehouse in central Munich for a single unnamed internet retailer and a two-storey 700,000 sq. ft. scheme in Gennevilliers in northern Paris, which Ikea will substantially occupy.

‘Multi-level’ space describes an arrangement whereby the industrial units provided at ground floor have direct vehicular access to a shared yard space, and typically smaller and ‘lighter’ industrial units on the upper floors are accessed by automated freight lifts. ‘Multi-storey refers to an arrangement whereby units on each level can be directly serviced by vehicles (including HGVs), meaning that a ramp is needed to service all floors.

Whilst we are excited about the prospects of delivering this type of industrial space in London, the formulation of the London Plan needs to acknowledge and understand the characteristics and influencing factors associated with multi-storey/level development, which are summarised below.

? As a new and innovative built solution, many industrial occupiers would prefer not to take space in a multi-storey development because the buildings are not the norm in the UK and from an operational perspective would always prefer a single storey unit. For example, the number of columns required within the warehouse to support the structure can impact on an occupier's ability to use the space flexibly. SEGRO has successfully delivered a number of multi-storey schemes in Europe, but the perception and unfamiliarity with such designs in the UK can initially render them unappealing to potential customers.
? As the pool of occupiers willing to take this space is more limited for the above reasons, development of this nature needs to be pre-let as opposed to being speculative.
? Unlike single storey schemes, such developments have to be built in one phase and will only be financially viable in the strongest industrial market locations where supply of high quality premises is highly constrained. In these prime locations, high demand for space means that occupiers need to compromise on their preference for privately occupied/single storey premises and opt for a multi-tenanted arrangement.
? Multi-storey development costs are higher but need to be rent sensitive given they will be a new product in the London market.
? As it is not a widely established product, investors are typically nervous about investing in this development, meaning that delivery is likely to come from a limited pool of developers.
? Development taking place on operational sites will require vacant possession, which will take time and will be costly. This is often made more challenging by local planning policies requiring a relocation strategy for existing businesses (though it should be noted that we typically try to relocate our customers within its portfolio in these situations).

? Large sites (4 acres and above) are most suitable for this type of development, particularly multi-level development as ramps take up a large part of the site. Such sites are hard to come across, particularly in the type of markets where such space will be viable, and so land assembly will be a common constraint to delivery.

Whilst multi-storey/level development will play a role in providing additional capacity it is highly unlikely alone to deliver the quantum of space required to meet London's needs as a very unique environment is required to deliver these schemes. To support more multi-storey developments, developers should be incentivised by a reduction in CIL payments and/or supported by:
? Delivery on public sector land, where the land value can be adjusted to make development viable and deliverable; and/or
? Government-led land assembly; and/or
? Enabling residential development – i.e. developers of the multi-storey/level development will usually also need to own (and therefore be the beneficiaries) of the land released for alternative development through the process of industrial land consolidation. The current proposals for affordable housing on industrial sites removes the enabling effect of this residential development – this is discussed in more detail in Section 3.

We believe that it will be necessary for the Mayor and London Boroughs to take a bold and active role in facilitating the development of new, modern and intensified industrial space, by identifying and allocating new sites for industrial development, and/or by assisting in the land assembly process to ensure such sites are available. Policy and planning powers should be utilised to their full potential in a bold and proactive way in order to instigate and facilitate positive change. This may include, amongst other things, the identification and allocation of suitable sites (4 acres or above) for intensification, and the use of CPO powers to assemble land to support delivery.

Whilst we are very much supportive of opportunities for multi-storey/level development, the London Plan should acknowledge that it carries risk, and is an expensive and complex form of development which will often not be financially viable. This form of development will not be widely delivered under the policies of the Draft London Plan as currently formulated, and even with changes to the policy, there are still a number of constraining factors which mean it cannot be seen as the ‘silver bullet’ to balancing London’s industrial needs with other objectives (principally housing delivery).

Further support is needed from the GLA and London Boroughs to facilitate the delivery of multi-storey industrial development (such as the recommendations set out within these representations) to ensure that the opportunities are realised. We would be happy to engage with the GLA further on these matters to ensure that the London Plan’s policies are both deliverable and effective in terms of meeting objectives for new industrial capacity and housing.

User: SEGRO

Basements
Basement development is highly expensive, and so it's unlikely to be a feasible option under normal market conditions. Whilst it is not necessarily inappropriate form of intensification, it's unlikely to be delivered in most circumstances and so the London Plan should not look at basement development as playing a core role in providing new industrial capacity.

Higher plot ratios

The trend for new industrial developments is for plot ratios to get smaller rather than bigger. 65% plot ratios were typical in the 1970s/80s, however modern developments are often delivered at lower plot ratio such as 45%. This is in spite of land values being much higher. Many industrial occupiers view their service yard as an integral part of their business operation. Apart from having to accommodate large commercial vehicles, the yard is used for a multitude of operational requirements, including fuel wash, refuelling, recycling, 'breaking-down' deliveries and external storage. In the last 5 years, we have delivered 1.6 million sq. ft. of new industrial space across 17 schemes in London.

These schemes include unit sizes ranging from 500 sq. ft. to 149,000 sq. ft. The average footprint density and floor area densities of these schemes are 37% and 45% respectively. These figures are noticeably smaller for cross dock facilities that modern delivery companies require, particularly those operating in parcel delivery and retailing.

A higher plot ratio approach will probably render any new modern single storey industrial schemes as unlettable. The developer will be forced to reduce the size of the external yard area, which is so critical to an industrial occupier. We also re-designed one of our customer units on Origin Business Park incorporating a 65% plot ratio. The customer reviewed the new design and responded as follows:

"Our current loading bays are in constant use and we need them all the time. Also, we need space for lorries to turn around. Making space smaller is not an option for us." Daniel Predko, Engineering Manager, Wasabi UK

Further to the above examples, CBRE has also taken a sample of recent urban logistics developments across North, South, East and West London to acknowledge the plot ratios being delivered by other industrial developers, including Royal London, Aviva Investors, Aberdeen Standard, Blackrock and Wrenbridge. Of the 55 new logistics premises reviewed, all plot ratios fall below 65%, with the average (mean) plot ratio at 46%.

User: SEGRO

Intensification – Overview
With the above comments in mind, we propose that Part A of Policy E7 is revised as follows:

"Development Plans and development proposals should be proactive and ***[DELETE: encourage]*** **allocate land for industrial** ***[DELETE: the]*** intensification of business uses in Use Classes B1c, B2 and B8 occupying all categories of industrial land through:
[DELETE: 1) development of mezzanines]
2) introduction of small units **where appropriate**
3) development of multi-storey schemes **where feasible**
4) addition of basements **where feasible**
[DELETE: 5) more efficient use of land through higher plot ratios having regard to operational requirements (including servicing) and mitigating impacts on the transport network where necessary."]

For all the forms of 'intensification' referenced above, the viability issues and practical complexities of delivery demonstrate that it is critically important that these forms of development are not constrained by other policies in the London Plan which are described in Section 3 of these representations.

User: SEGRO

Mixed Use Development on Non-Designated Industrial Sites
We support the promotion of mixed use development which includes both housing and industrial uses, and we are currently exploring opportunities to deliver this type of development on sites within our portfolio. This includes the redevelopment of the former Nestle factory site in Hayes, where in December 2017 LB Hillingdon's planning committee has recently resolved to grant planning permission.

Whilst we are enthused about this innovative form of development, it is important that the policies within the London Plan are formulated in such a way which encourages and supports mixed use development coming forward. We are examining opportunities to deliver mixed use development on some of our industrial estates where new public transport links and local amenities are changing the character of the area. However, in doing so we have identified a number of risks and challenges which need to be resolved.

Policy E7 does not state that a certain amount of industrial development needs to be delivered in order to make mixed use development acceptable, which is a different approach to SIL/LSIS consolidation (which requires no net loss of floorspace or the equivalent of 65% plot ratio, whatever is greater).

Mixed use development of this kind has different design considerations and viability assumptions which need to be understood and acknowledged by the Mayor and the London Plan's policies. For instance, the construction costs of development are higher for both the industrial development and the residential development when delivered together, due to the need to ensure design measures are included to protect residential amenity and secure an uncompromised industrial function.

Costs are particularly high where uses are separated vertically, as the structural requirements for the industrial uses are far greater than average when a residential development is proposed above.

These proposed higher than average costs for both use classes are accompanied by lower than average values, as for both residential occupiers and industrial operators, the shared environment is considered to be sub-optimal. Just need to check this is correct.

For this reason, the development risks being undertaken are also greater and viability assumptions would need to account for this. Finally, the need for separate access and appropriate separation of uses means that design efficiencies and overall development density are likely to be compromised verses a single use scheme.

Our initial testing has indicated that viability is constrained, even in locations where industrial values are amongst the highest in London, and where the local environment is conducive to very tall residential buildings. These viability issues are significantly increased by the threshold for 50% affordable housing, which will certainly make mixed use industrial/residential development unviable in all locations and scenarios. Affordable housing viability is discussed in detail in Section 3, but in summary the current Draft Policies will prevent this type of development coming forward, stifle innovation and further threaten the delivery of already ambitious housing targets. We believe this more complex form of mixed use development needs to be incentivised through a lower affordable threshold figure.

Mixed use development is one of four means of addressing the loss of non-designated industrial sites. The other three comprise:
1. Demonstrating there is no reasonable prospect of the site being used for the industrial and related purposes to support London's economic function; or
2. The site is allocated in a Development Plan for residential or mixed-use development; or
3. Suitable alternative accommodation (in terms of type, specification, use and size) is available in reasonable proximity to the development proposal and subject to relocation support arrangements for existing businesses before the commencement of new development

User: SEGRO

Industrial Development Viability – flexible/affordable workspace and affordable housing
Industrial development delivered either as part of an intensified multi-storey scheme or through a mixed-use industrial/residential development is highly challenging and more costly in terms of financial viability and deliverability. In the case of intensified industrial development in particular, it is unlikely to come forward in most instances unless it is being used to offset higher value residential development, or is facilitated by public funding or GLA and London Borough level support.

Consequently, we are very concerned about some of the planning obligations proposed within the Draft London Plan, which we consider will stifle the delivery of the type of innovative industrial development promoted by the Mayor, and prevent a number of the Plans objectives being realised without public sector support or funding.

User: SEGRO

Substitution
Part F of Policy E7 states that Development Plans and planning frameworks should consider, in collaboration with neighbouring authorities within and outside London, the scope to facilitate the substitution of some of London's industrial capacity to related property markets elsewhere in London and beyond London's boundary where:

1) this results in mutual advantage to collaboration partners inside and outside London and supports a more efficient use of land

2) full regard is given to both the positive and negative impacts of substitution including impacts on servicing the economy inside and outside London, businesses and customers, labour markets and commuting, supply-chains and logistics, congestion, pollution and vehicle miles

3) a clearly-defined strategy for the substitution of future demand capacity and/or relocation arrangements where relevant, is in place to support this process.

As set out in our introduction and the research undertaken in our Keep London Working report, locating industrial space within the populations they serve is critically important to the efficient and sustainable operation of the urban logistics sector, and the transport network.

The consequence of not doing this will be more pressure will be industrial occupiers to transport goods and services over a greater distance which will have negative implications on the environment, congestion, air quality and supply chain efficiency. For these reasons, we do not believe that pushing London's capacity outside of the Capital is a sustainable or effective solution to meeting industrial needs. It is essential that sufficient industrial and logistics capacity remains within London within close proximity and/or easy access to markets, especially central London.

Furthermore, we question how the concept of 'substituting' London's industrial capacity inside London to locations outside of London would be controlled and managed by the planning system. The Mayor has no jurisdiction outside of London, and so we are concerned that if relocated, industrial capacity which is essential to London's business and residents will no longer be protected by London Plan policy.

Overall, we do not feel that the concept of ‘substitution’ is an appropriate policy tool for the London Plan. This is not to say that additional industrial space outside of London could not enhance London’s industrial capacity, as it would certainly help to manage the exceptional demand for space. However, this space should not be delivered in place of well-located industrial capacity within London which must be protected.

User: SEGRO

Parts B and C of Draft Policy E7 seek to ensure local plan-led and masterplan-led approaches are progressed for SIL/LSIS release. We support that this approach should only be progressed subject to a thorough and robust plan-led approach at local level in collaboration with the GLA, not through ad-hoc planning applications. This will help to ensure that capacity is rigidly monitored and managed at a strategic scale, which is highly important as the supply of industrial capacity is a strategic planning issue.

Part E of the Policy sets out the processes by which Parts B, C and D of the policy must comply by. We are in particular support for ensuring that the industrial and related activities on-site and in surrounding parts of the SIL, LSIS or non-designated industrial sites are not compromised in terms of their continued efficient function, access, service arrangement and days/hours of operation noting that many businesses have a 7-day/24-hour access and operational requirements. It should be ensured that surrounding residential or mixed-use development can function alongside industrial uses without compromising their operations.

We support the requirement that the intensified industrial, storage and distribution uses are completed and operational in advance of any residential component being occupied, as this helps to ensure that maintaining or increasing industrial capacity is the primary objective in the process of consolidation.

For the same reason, we agree that a development agreement between industrial and residential developers should be in place at planning stage to demonstrate that industrial proposals are genuinely deliverable, and are not just proposed to unlock potential residential values.

User:	UPS

- Need to be more clear what this is and where it can work
- Yard space/parking – this is not an area that can be lost as it is needed to run the business
- You can’t have a logistics operation on the ground flow and residential on top and you can’t have a logistics operations that operates from a 2nd floor.
- Retail could work on the ground floor of residential.
- Ensure small businesses are not pushed out and be replaced by big retailers

User:	U+I
This policy is unnecessary, causes delay in delivery and potentially unlawful in the context of section 38(6) for decision-making to be hampered by the inclusion of paragraphs b and c, requiring plan-based framework alterations to be in place rather than allow judgement by members on planning applications the same issues as in plan-making.	

User: SEGRO

Appendix – SEGRO Proposed Policy Amendments to the Draft London Plan

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

A Development Plans and development proposals should be proactive and ***[DELETE: encourage the]*** **allocate land for industrial** intensification of business uses in Use Classes B1c, B2 and B8 occupying all categories of industrial land through:

1. ***[DELETE: development of mezzanines]***
2. introduction of small units **where appropriate**
3. development of multi-storey schemes **where feasible**
4. addition of basements **where feasible**
5. ***[DELETE: more efficient use of land through higher plot ratios having regard to operational requirements (including servicing) and mitigating impacts on the transport network where necessary.]***

B Development Plans and planning frameworks should be proactive and consider, in collaboration with the Mayor, whether certain logistics, industrial and related functions in selected parts of SILs could be intensified. Intensification should **add to existing industrial capacity in Boroughs which need to 'provide capacity', and in other Boroughs should** facilitate the consolidation of the identified SIL to support the delivery of residential and other uses, such as social infrastructure, or to contribute to town centre renewal. This process must meet the criteria set out in part E below and ensure that it does not undermine or compromise the integrity or effectiveness of the SIL in accommodating the industrial-type activities identified in part C of Policy E5 Strategic Industrial Locations (SIL). This approach should only be considered as part of a plan-led process of SIL intensification and consolidation (and the areas affected clearly defined in Development Plan policies maps) or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough, and not through ad hoc planning applications.

[DELETE: F Development Plans and planning frameworks should consider, in collaboration with neighbouring authorities within and outside London, the scope to facilitate the substitution of some of London's industrial capacity to related property markets elsewhere in London and beyond London's boundary where:

1. ***this results in mutual advantage to collaboration partners inside and outside London and supports a more efficient use of land***
2. ***full regard is given to both the positive and negative impacts of substitution including impacts on servicing the economy inside and outside London, businesses and customers, labour markets and commuting, supply-chains and logistics, congestion, pollution and vehicle miles***
3. ***a clearly-defined strategy for the substitution of future demand capacity and/or relocation arrangements where relevant, is in place to support this process.***

This approach should only be considered as part of a plan-led process of consolidation and intensification (and clearly defined in Development Plan policies maps) and not through ad hoc planning applications.]

User: West London Alliance

We welcome the direction of travel set out in the draft plan (E7) to enable greater flexibility in the way strategic industrial land (SIL) is configured, to allow greater intensification and the creation of high quality, mixed use communities that do not result in a net loss of employment space. Such a move is essential if boroughs across London are to be enabled to think creatively about the best way to strike the right balance between employment space and living space, and to deliver new homes and communities at the scale needed.

KEY ASK 5: We would welcome a constructive dialogue with the GLA's Planning and Regeneration about a number of strategic opportunities to intensify SIL that both safeguards existing employment floor space and allows high quality new communities to be created, through a coordinated local planning approach.

User:	Roca Investments
Roca supports the Mayor’s recognition of the ability of industrial uses to be ‘co-located’ or mixed with residential through intensification.	

User: Roca Investments

Policy E7 states that intensification of SIL and LSIS should only be considered on sites that have been specifically identified through a plan-led process or as part of a co-ordinated masterplanning process. This conflicts with the wording of policy E4 which indicates that the release of industrial land to other uses should be confined to those LPAs as outlined in draft policy E4 and intensification and co-location can only take place in those boroughs identified for 'limited release'.

We consider the wording of the employment policies within the draft London Plan are potentially restrictive and detrimental to the delivery of much needed and increased housing targets for London, where sites are wholly capable of delivering both as part of co-location and mixed use. . Whilst we welcome the promotion of intensification and co-location we consider the ambiguity around the designation of such areas restrictive which do not fully take into consideration matters which are sitespecific

User: Notting Hill Housing Trust

NHHT supports the partial release of LSIS where businesses uses can be intensified or where the land can be used more efficiently. Where this can be accommodated, NHHT is supportive of LPAs identifying LSIS sites in development plans that are capable of mixed-use and residential development where a consolidated approach to industrial and business uses can is applied. An overall master planning approach would provide a framework and vision for an area which NHH would strongly encourage. Where appropriate NHH would support the opportunity to reconfigure the land and implement well thought out mixed use developments.

NHHT would also encourage the Mayor and LPAs to consider the type of residential accommodation that would be suitable in locations. NHHT is of the view that density should be encouraged in sites of this nature; however larger homes may not always be suitable in these types of locations where direct access to green space, play provision etc. may not be possible and/or where development land is constrained due to its mixed-use nature.

User: Chartered Institute of Architectural Technologists

Economy

Policies E1 to E11

We are in agreement with the proposals contained in the plan.

User: London Riverside BID

5. Policy should recognise the need for open yard and storage space.

This should be a golden thread throughout the policies on industry and logistics. Policy should recognise that this space is critical to the operation of business and is a fundamental component of particular uses such as distribution centres. In particular, policy E7 should recognise that yard space should be re-provided in new developments and should be a priority for new logistics hubs.

User: London Riverside BID

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

We support what we believe to be the overarching aim of this policy, to encourage more efficient use of land in employment areas and enable better integration of industry, logistics and other uses. This will potentially make industry a more visible and recognised part of London.

Whilst we welcome the encouragement of innovation in industrial and logistics development, we are concerned that the policy's principles are as yet untested in London both from a development and an occupier/operator perspective and are unlikely to be achievable on all sites for various reasons including development viability, site size and layout or development constraints. As such, this policy is unlikely to be the silver bullet that will deliver sufficient industrial capacity nor optimise the potential growth from highly accessible locations such as transport corridors, transport hubs, town centres and OAs.

Intensification is only likely to work in areas where there is high demand. This will ensure that the costs of delivering multi-storey schemes can be recouped through rental income. New formats of industrial uses are, as yet, untested in a London market and again may only be attractive to occupiers where there is a lack of alternative space in the area.

Most importantly, innovative forms of industrial and logistics space, such as multi-storey development will only work where they where they can be viably delivered. The viability appraisal supporting the draft London Plan has only tested single storey industrial developments and has therefore not fully tested the viability of multi-storey industrial schemes across the non-residential scenarios tested. We are therefore concerned that there is limited evidence to demonstrate if and where this innovative type of development will work in London. The GLA should undertake more work on this matter and clarify pre-Examination in public whether there are any areas where it may be more challenging to deliver intensified industrial uses.

The intensification and co-location should be industrial led and not residential led – for the design of new industrial and logistics development to work adjacent to residential it must be given priority in terms of its operational needs. The policy should recognise that co-location with some uses may not be compatible with residential such as cross docking facilities.

Part C of the policy should use clearer terminology, for example, does intensification mean mixed use development or more intensive use for industrial and logistics use? Is the intensification intended to provide the capacity for introducing residential uses through co-location? Does co-location mean the separation of industrial and residential uses or can this mean residential uses above a logistics hub for example? Better definitions should be provided so as to avoid any confusion in the interpretation and application of this policy.

The promotion of substitution, locating industrial uses outside of London, could lead to more unsustainable travel patterns in London with increased and longer trips and associated air quality impacts. It would also lead to the potential loss of job opportunity and economic benefit from the capital. A better approach would be to allow boroughs to identify new industrial sites in appropriate location such as near arterial routes, adjacent to rail, air and water interchanges, in and around town centre and appropriately sized logistics hubs within OAs. These new sites can then be used to rebalance against any losses of industrial capacity to enable mixed use development including residential to come forward.

The 50% threshold for SIL and LSIL sites will mean that most sites will need to go through the viability tested route, we do not consider that it reflects the costs of delivering intensified industrial uses and may act as a deterrent to intensification of existing sites. The plan should therefore clarify if this is the intention of the proposed threshold. This policy objective could also undermine the plan’s other objectives to seek t deliver affordable workspace through Section 106 obligations.

User: British Property Federation

We have concerns about the accuracy and relevance of the data the GLA's London Employment Sites Database Report, which has been used to calculate the 65% site density.

We recommend that the 65% plot ratio rule is reduced to 45% but also recognises that this figure could change subject to the following:

- Last mile delivery/parcel depots utilizing cross docks facilities
- Irregular or constrained plots
- 'Starter' units under 5,000 sq ft
- Specific operational needs of occupier for more bespoke facilities driven by changing operational processes, including the development of robotics and automation.

Whilst we recognise the principle of 'no net loss' approach, the draft policy does not take account that many old redundant factories or industrial schemes have incredibly high plot ratios, or in some cases are already multi-storey. We recommend that the policy is applied with flexibility in exceptional circumstances where the existing floorspace no longer meets the operational needs of industrial occupiers.

User:	GLA Industrial BIDs Group

5. Policy should recognise the need for open yard and storage space.

This should be a golden thread throughout the policies on industry and logistics. Policy should recognise that this space is critical to the operation of business and is a fundamental component of particular uses such as distribution centres. In particular, policy E7 should recognise that yard space should be re-provided in new developments and should be a priority for new logistics hubs.

User:	Freight Traffic Control 2050 academic project

There are major reservations about the extent to which existing logistics sites can be more intensively developed (with logistics buildings and/or residential or other industrial buildings). The parking, manoeuvring and turning circle requirements of logistics sites need to be taken account of, as well as the attractiveness of such sites to users if they are to be viable for logistics operations. In terms of mezzanine and multi-story logistics developments, these are most likely to remain small in number and built-to-order in London. The operational challenges of operating from such sites as well as the related operational costs will make these unattractive for most operators unless there is a need for a logistics site in a specific area where there are simply no affordable (from a rent point of view) or available alternatives. Automation in supply chains (in materials handling and vehicles) may make such sites more operationally viable over time, but I think this is unlikely in the next 10-20 years.

User: GLA Industrial BIDs Group

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

We support what we believe to be the overarching aim of this policy, to encourage more efficient use of land in employment areas and enable better integration of industry, logistics and other uses. This will potentially make industry a more visible and recognised part of London.

Whilst we welcome the encouragement of innovation in industrial and logistics development, we are concerned that the policy's principles are as yet untested in London both from a development and an occupier/operator perspective and are unlikely to be achievable on all sites for various reasons including development viability, site size and layout or development constraints. As such, this policy is unlikely to be the silver bullet that will deliver sufficient industrial capacity nor optimise the potential growth from highly accessible locations such as transport corridors, transport hubs, town centres and OAs.

Intensification is only likely to work in areas where there is high demand. This will ensure that the costs of delivering multi-storey schemes can be recouped through rental income. New formats of industrial uses are, as yet, untested in a London market and again may only be attractive to occupiers where there is a lack of alternative space in the area.

Most importantly, innovative forms of industrial and logistics space, such as multi-storey development will only work where they where they can be viably delivered. The viability appraisal supporting the draft London Plan has only tested single storey industrial developments and has therefore not fully tested the viability of multi-storey industrial schemes across the non-residential scenarios tested. We are therefore concerned that there is limited evidence to demonstrate if and where this innovative type of development will work in London. The GLA should undertake more work on this matter and clarify pre-Examination in public whether there are any areas where it may be more challenging to deliver intensified industrial uses.

The intensification and co-location should be industrial led and not residential led – for the design of new industrial and logistics development to work adjacent to residential it must be given priority in terms of its operational needs. The policy should recognise that co-location with some uses may not be compatible with residential such as cross docking facilities.

Part C of the policy should use clearer terminology, for example, does intensification mean mixed use development or more intensive use for industrial and logistics use? Is the intensification intended to provide the capacity for introducing residential uses through co-location? Does co-location mean the separation of industrial and residential uses or can this mean residential uses above a logistics hub for example? Better definitions should be provided so as to avoid any confusion in the interpretation and application of this policy.

The promotion of substitution, locating industrial uses outside of London, could lead to more unsustainable travel patterns in London with increased and longer trips and associated air quality impacts. It would also lead to the potential loss of job opportunity and economic benefit from the capital. A better approach would be to allow boroughs to identify new industrial sites in appropriate location such as near arterial routes, adjacent to rail, air and water interchanges, in and around town centre and appropriately sized logistics hubs within OAs. These new sites can then be used to rebalance against any losses of industrial capacity to enable mixed use development including residential to come forward.

The 50% threshold for SIL and LSIL sites will mean that most sites will need to go through the viability tested route, we do not consider that it reflects the costs of delivering intensified industrial uses and may act as a deterrent to intensification of existing sites. The plan should therefore clarify if this is the intention of the proposed threshold. This policy objective could also undermine the plan’s other objectives to seek t deliver affordable workspace through Section 106 obligations.

User:	Business for London

Industrial land. The draft plan provides greater protection Industrial Locations (SIL and LSIL). Policy E4 seeks no net loss of industrial capacity across London. This is likely to prove difficult to implement on a site by site basis, particularly as Policy E7 facilitates the intensification and co-location of industrial land which could result in some land being lost to residential use. The amount of industrial floorspace will need to be retained through the more intensive use of sites, e.g. multi-storey warehouses. Such developments are currently quite limited and may well need positive intervention by the Mayor and others to show how this can be successfully realised.

User: Watkin Jones Group

Policy E7 Intensification, Co-location and Substitution of Land for Industry, Logistics and Services to Support London's Economic Function

The Watkin Jones Group is supportive of this policy but has specific comments to make with regards to provisions C, D and E of the policy that relate to the co-location of commercial, logistical and some industrial uses alongside residential uses. The innovative approach to the potential co-location of these uses is welcomed and supported. There is currently a new wave of live-work schemes being developed in the UK that follow an American model whereby, rather than the live and work space being located within a single unit, the live and work spaces are integrated within and spread across a single building. Some examples of this type of scheme are already being promoted within London including at Kleine Wharf in Hackney, The Collective at Old Oak and Fish Island at Hackney Wick.

The issue with trying to progress this type of scheme is that traditionally local planning authorities have generally retained sites for employment and industrial uses only and are unable to permit the residential element of such schemes due to outdated existing planning policies within their local plans. The provision of this policy within the Draft London Plan is supported but it is imperative that the Boroughs are encouraged to adopt similar policies otherwise the policy at London Plan level becomes almost redundant.

In addition, we do not agree with the requirement for a 50% provision of affordable housing on the fast-track route for sites classed as industrial/employment sites. Due to the need to provide replacement (refurbished or new) employment/industrial space there is already a reduction in the potential profit for the scheme and the introduction of a 50% provision of affordable housing will ensure that these innovative schemes will become unviable and the opportunity to provide an alternative range of residential accommodation in accordance with the Mayor's overarching aims within the London Plan. We therefore propose that the rate for the fast-track route on these developments should be 35% bringing them in line with the requirements for traditional residential development.

Finally, whilst we acknowledge and support the aims of Policy E7 we consider the provisions of the policy into the potential mixed-use redevelopment of such sites can be transferred and utilised within both Policy E5 sites (Strategic Industrial Locations) and Policy E6 Sites (Locally Significant Industrial Sites) on a strictly case by case basis.

User: East of England Local Government Association

Authorities are also concerned that the processes from redevelopment of industrial land would be ad hoc and welcome the commitment in the London Plan for a strategically co-ordinated process that focuses on intensification as well as the potential for substitution outside London where there is local agreement (policy E7).

The three boroughs identified for limited release of industrial land and floor space are boroughs within the Thames Gateway that link to authorities within the East. The limited release is based on these areas having relatively low values and high vacancy rates. Notwithstanding the general supportive position of the economy policies in the draft London Plan, such as the aim for no net loss of industrial land uses, the application of the intensification approach needs to be applied within these areas. London's industrial study highlighted that two of the three areas assigned for limited release (Havering and Barking & Dagenham) actually saw net increases in floor space between 2001-2016. The report also notes that "there are some signs that occupiers and developers who would previously only consider west London locations are now looking to the east" (CAG, London Industrial Land Demand, page 213). These factors indicate that pursuing of intensification in these areas is a

justified approach and the interaction between the proposed polices could be clearer in this regard.

The protection afforded to secondary materials and waste management in the policies (E4 and E5) is welcome and benefits the vitality of the wider waste supply chain but, so to link with the safeguarding policy on aggregates (SI10), reference could also be made to aggregates within the economic policies.

User: East of England Local Government Association

Policies within the draft London Plan (E5, E7 and E8) refer to the potential of relocating some employment to the WSE and collaborative working with authorities outside London on this matter. At the Wider South East Summit, the Mayor referred the Royal Opera House's linkage to Thurrock and the Deputy Mayor agreed to joint research on the location of firms. Councils in the East welcome the recognition of the wider economic aspects and that London's policy and evidence base reflects on the office and industrial markets in the Wider South East.

Representatives of the GLA have also previously expressed an interest in moving jobs into the WSE. There would be a mutual benefit to London and East of England residents if our economic prospects were aligned so that more jobs were created and, if necessary, moved from London particularly if people were enabled to live and work locally – thereby easing pressure off London's already strained transport network and housing. It would be helpful if as part of the London Plan, the Mayor of London set out *activities* related to aligning economic development opportunities across the WSE alongside local authorities and Local Enterprise partnerships. This would enable willing partners to better identify opportunities for collaborating with London and help develop a more sustainable approach to managing growth in London and the WSE as a whole.

There is scope for further collaboration surrounding the economic linkages. The LSE's migration review noted that, the economic interconnections have "matured to a stage where almost all of it is integrated in one economic agglomeration" (LSE, Review of Research on Migration Influences and Implications for Population Dynamics in the Wider South East, page 23). The economic development activities such as the Tech Nation 2017 Survey, TechCity and MedCity are not just relevant to London but can be linked to supply-chains and sectoral linkages throughout the WSE. The emphasis on linkages through academic research institutes in Oxford and Cambridge through MedCity is a clear example and authorities in the East are interested in exploring other economic linkages further. The draft London Plan contains supportive policies to restrict the permitted development rights on conversion of office to residential.

Many towns outside of London have also lost office space under existing permitted development rights and face difficulty attracting replacement businesses. Businesses do not necessarily consider opportunities beyond London's boundary and may need a nudge to encourage them to invest in areas outside of London. High quality employers are key to sustainable local growth and there would be a mutual benefit to London and councils areas in the East if more jobs were created outside of London so that more residents were able to live and work locally – thereby easing pressure off London and the region's already strained transport network and housing.

User: Amazon UK Services Limited

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

Policy E7 encourages the intensification of business uses (Class B1C, B2 and B8 uses) on 'industrial land'. In particular, Part A(5) makes reference to achieving more efficient use of land through the adoption of higher plot ratios. However, this is subject to a caveat, namely "having regard to operational requirements (including servicing) and mitigating impacts on the transport network where necessary".

Part A(5) therefore seems to acknowledge that a 'one size fits all' approach (as advocated by policies E4 and E5) in terms of plot ratios is not appropriate and proposals for new logistics warehouses need to be considered upon their merits. Amazon support the flexible approach adopted by policy E7 A(5). Such flexibility and consistency needs to be reasonably included within draft policies E4 and E5.

User: CBRE Global Investing

Policy E7 sets out the Draft London Plan's policies in relation to intensification, co-location and substitution for industrial, logistics and servicing land.

Part A of the policy sets out the proposed methods for intensifying industrial uses through:
1) development of mezzanines
2) introduction of small units
3) development of multi-storey schemes
4) addition of basements
5) more efficient use of land through higher plot ratios having regard to operational requirements (including servicing) and mitigating impacts on the transport network where necessary.

CBRE Global Investors supports the aim to deliver additional industrial floorspace on sites with capacity for the above, however, requests that this part of the policy is better evidenced to demonstrate how these elements can work in practice. Many industrial and warehousing occupiers require large, single storey units with high roof voids and large servicing yards (which reduce the plot ratios) due to the nature of their operations. Furthermore, as set out above in the responses to Policies E2, E3 and E4, small multi-tenanted units are not typical of these use classes and can be unattractive to industrial/warehousing developers and landlords. Where these types of developments are promoted and progressed, CBRE Global Investors suggest that developer incentives be promoted such as a reduction in CIL liabilities and where appropriate, forms of enabling development (discussed further under Part D below). This is because a number of the suggestions for intensification are likely to have impacts on viability (particularly basement and multi-storey schemes), where industrial and warehousing land values alone would be unlikely to support such development. We would therefore would request an amendment to the policy as set out below.

Parts B and C of the Policy set out the circumstances under which SIL/LSIS land will be reviewed and considered for intensification or release and note that this should not be done through 'ad hoc planning applications', but as part of a plan-led process. CBRE Global Investors has concerns about this, given the diversity of progress across London Boroughs in Development Plans and the potential delays and threat to delivery that this could cause. We reiterate the same concerns regarding part F of the Policy.

Part D states that mixed-use or residential development proposals on Non-Designated Industrial Sites will be supported where:
1) there is no reasonable prospect of the site being used for the industrial and related purposes set out in part A of Policy E4 Land for industry, logistics and services to support London's economic function; or
2) it has been allocated in a Development Plan for residential or mixed-use development on the basis of part D.1; or
3) industrial, storage or distribution floorspace is provided as part of mixed-use intensification where this is feasible; or
4) suitable alternative accommodation (in terms of type, specification, use and size) is available in reasonable proximity to the development proposal and subject to relocation support arrangements for existing businesses before the commencement of new development.

CBRE Global Investors support the co-location of uses in appropriate locations. Co-location will, and has, been successful on a number of sites throughout London, the rest of the UK and abroad, and clearly has the potential to provide significant benefits, particularly in relation to the development of redundant industrial land. CBRE Global Investors therefore requests that the Mayor considers in more depth how to address the deliverability and feasibility issues associated with co-location, and provides the requisite evidence.

Part E of the Policy provides specific guidance on how the above parts of the policy should be implemented and undertaken. Notwithstanding the above comments on the feasibility of this policy approach, we consider there are a number of inherent conflicts within this approach, which render the initial parts of the policy (A to D) irrelevant, i.e. requiring both intensification but the provision of yard space and co-location of uses but support for 24 hour access. Furthermore, given the viability challenges described above relating to the delivery of such sites, and the likely need for residential development to act as 'enabling' development, part 3 of part E of the Policy should be removed. The full proposed amendments are detailed below.

Policy Amendment Sought

A Development Plans and development proposals should be proactive and encourage the intensification of business uses in Use Classes B1c, B2 and B8 occupying all categories of industrial land through, where appropriate, feasible and viable, the following:

1) development of mezzanines
2) introduction of small units
3) development of multi-storey schemes
4) addition of basements
5) more efficient use of land through higher plot ratios having regard to operational requirements (including servicing) and mitigating impacts on the transport network where necessary.

B Development Plans and planning frameworks should be proactive and consider, in collaboration with the Mayor, whether certain logistics, industrial and related functions in selected parts of SILs could be intensified. Intensification should facilitate the consolidation of the identified SIL to support the delivery of residential and other uses, such as social infrastructure, or to contribute to town centre renewal. This process must meet the criteria set out in part E below and ensure that it does not undermine or compromise the integrity or effectiveness of the SIL in accommodating the industrial-type activities identified in part C of Policy E5 Strategic Industrial Locations (SIL). This approach should ~~only~~ be considered as part of a plan-led process of SIL intensification and consolidation (and the areas affected clearly defined in Development Plan policies maps) or as part of a co-ordinated application-led masterplanning process in collaboration with the GLA and relevant borough, ~~and not through ad hoc planning applications~~.

C Development Plans and planning frameworks should be proactive and consider whether certain logistics, industrial and related functions in selected parts of LSIS could be intensified and/or co-located with residential and other uses, such as social infrastructure, or to contribute to town centre renewal. This process should meet the criteria set out in part E below. This approach should ~~only~~ be considered as part of a plan-led process of SIL intensification and consolidation (and the areas affected clearly defined in Development Plan policies maps) or as part of a co-ordinated **application-led** masterplanning process in collaboration with the GLA and relevant borough~~, and not through ad hoc planning applications.~~

D Mixed-use or residential development proposals on Non-Designated Industrial Sites will be supported where:
1) there is no reasonable prospect of the site being used for the industrial and related purposes set out in part A of Policy E4 Land for industry, logistics and services to support London’s economic function; or
2) it has been allocated in a Development Plan for residential or mixed-use development on the basis of part D.1; or
3) industrial, storage or distribution floorspace is provided as part of mixed-use intensification where this is feasible; or
4) suitable alternative accommodation (in terms of type, specification, use and size) is available in reasonable proximity to the development proposal and subject to relocation support arrangements for existing businesses before the commencement of new development.

Mixed-use development proposals on Non-Designated Industrial Sites which co-locate industrial, storage or distribution floorspace with residential and/or other uses should also meet the criteria set out in parts E.2 to E.4 below.

E The processes set out in Parts B, C and D above must ensure that:

1) the industrial uses within the SIL or LSIS are intensified to deliver an increase (or at least no overall net loss) of capacity in terms of industrial, storage and warehousing floorspace ~~with appropriate provision of yard space for servicing~~
2) the industrial and related activities on-site and in surrounding parts of the SIL, LSIS or Non-Designated Industrial Site are not **significantly** compromised in terms of their continued efficient function, access, service arrangements and days/hours of operation ~~noting that many businesses have 7-day/24-hour access and operational requirements~~
~~3) the intensified industrial, storage and distribution uses are completed and operational in advance of any residential component being occupied~~
3) appropriate design mitigation is provided in any residential element to ensure compliance with 1 and 2 above with particular consideration given to: …

F Development Plans and planning frameworks should consider, in collaboration with neighbouring authorities within and outside London, the scope to facilitate the substitution of some of London's industrial capacity to related property markets elsewhere in London and beyond London's boundary where:

1) this results in mutual advantage to collaboration partners inside and outside London and supports a more efficient use of land

2) full regard is given to both the positive and negative impacts of substitution including impacts on servicing the economy inside and outside London, businesses and customers, labour markets and commuting, supply-chains and logistics, congestion, pollution and vehicle miles
3) a clearly-defined strategy for the substitution of future demand capacity and/or relocation arrangements where relevant, is in place to support this process.

This approach should only be considered as part of a plan-led process of consolidation and intensification (and clearly defined in Development Plan policies maps) or through a comprehensive planning application process ~~and not through ad hoc planning applications~~.

User: Catalyst Housing Limited

SIL

Draft Policy E4 relates to land for industry, logistics and services. Amongst other things, it sets out the three categories, being SIL, LSIS and non-designated Industrial Sites. Part C states that in overall terms across London there should be no net loss of industrial floorspace capacity within designated SIL and LSIS. It states that the release of industrial land should be facilitated through the processes of industrial intensification, co-location and substitution. The supporting text explains the 'provide capacity', 'retain' and 'limited release' categories. Only three Boroughs fall within the limited release category, all within the Thames Gateway.

Draft Policy E5 relates to SIL. Part D presumes against uses not listed in the policy (including residential) except in areas released through a strategically co-ordinated process of SIL consolidation – to be carried out through a planning framework or Development Plan document.

It is possible that the 'provide capacity', 'retain' and 'limited release' categories pertaining to each of the Boroughs may change over the life of the Plan, particularly as technology is advancing rapidly. We therefore think some provision should be introduced to the policy to enable the Mayor, in consultation with the relevant Borough(s), to release SIL without needing to go through a plan-led process. It would still be for the Mayor to judge whether release is acceptable on a site by site basis, but the flexibility could enable an appropriate site to come forward more swiftly for alternative uses.

Similar flexibility should be introduced within draft Policy E7. Provision should be made for alternative uses to be considered through a planning application-led approach, not just through the Local Plan and/or through a co-ordinated masterplanning process.

User:	Benhill Residents
We have some concerns that mixing of industrial activities and residential will drive out what are deemed to be ‘dirty businesses’ and about the potential of increase property values, making it more difficult for some businesses to be able to afford to stay.	

User: Royal London

Policy E7

Policy E7 sets out the Draft London Plan's policies in relation to intensification, co-location and substitution for industrial, logistics and servicing land. Industrial land form a significant part of RL existing portfolio including sites at Colindale, Brentford, Southall and the Old Kent Road within London. As a landowner of these assets RL welcome the policy support provided for the intensification of such business uses.

Part D of the policy states that mixed-use or residential development proposals on Non-Designated Industrial Sites will be supported where certain conditions are met. Whilst there is likely to be challenges to such development and certainty co-location of uses will not be the appropriate approach in all instances RL welcome the support for co-location of uses in appropriate locations. Co-location clearly has the potential to provide significant benefits, particularly in relation to the development of redundant industrial land.

The complexities of colocation development however are apparent as is the potential impact on the financial value of industrial and residential units delivered as part of a co-location scheme (in comparison to either as a single use). Given this it is essential that planning requirements such as affordable housing are set at a level to make such development viable and incentivised. The application of a 50% threshold approach for such sites does not reflect this reality and should be significantly reduced in accordance with our comments on policy H6.

User:	Earls Court Public Sector Tenants' Assoc

We have some concerns that mixing of industrial activities and residential will drive out what are deemed to be ‘dirty businesses’ and about the potential of increase property values, making it more difficult for some businesses to be able to afford to stay

User: Elaine Chambers

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

We have some concerns that mixing of industrial activities and residential will drive out what are deemed to be 'dirty businesses' and about the potential of increase property values, making it more difficult for some businesses to be able to afford to stay.

User: Fairview New Homes

Whilst there is some flexibility in this draft policy to allow intensification there are still aspects of Policy E7 which we object to. Firstly, Part B is too restrictive. Opportunities for redevelopment which meet the aspirations of the policy could be lost because of the time it takes to progress development plans. Several London Boroughs have development plans that are at an advanced stage in the preparation and adoption process. None of these will be rushing to review SIL/LSIS and have updated plans for many years.

If adopted the London Plan policy E7 as drafted, this will create significant disparity in multiple London Boroughs where plans have been progressing for a number of years to release designated industrial land for mixed use redevelopment. The release of such sites for redevelopment is vital for the planned regeneration of decreasingly viable industrial areas in London. Such redevelopment is also pivotal for the delivery of housing land required to meet significantly increased housing targets – as set out in the draft London Plan. Examples include the planned release of SIL land in Southwark, as set out in the Old Kent Road AAP, which is at an advanced stage and anticipated for adoption in April 2019. The redevelopment proposed in this plan would be in contravention of the Draft London Plan once adopted, as there is no scope at present for the re-provision of the industrial floorspace to be lost. These plans have the support of a localised evidence base and multiple rounds of consultation with the public and with key stakeholders. For the London Plan to adopt a policy which would undermine these plans would be to derail the spatial development strategy for many London Boroughs.

The following nine LPAs have draft Local Plans which are at an advanced stage but not yet adopted (nb. Not including many significant AAPs for redevelopment of industrial areas)

Authority	Draft Plan Published	Plan Submitted
Bromley, London Borough of	14/11/2016	11/08/2017
Croydon, London Borough of (Partial Review)	05/09/2016	03/02/2017
Hackney , London Borough of (Local Plan)	26/10/2017	
Hammersmith & Fulham, London Borough of (Review)	09/01/2015	28/02/2017
Havering, London Borough of (Local Plan)	07/08/2017	
Kensington & Chelsea, Royal Borough of (Partial Review)	28/10/2016	05/05/2017
Redbridge, London Borough of (Local Plan)	28/07/2016	03/03/2017
Richmond Upon Thames, London Borough of (Review)	04/01/2017	19/05/2017
Sutton, London Borough of (Local Plan)	09/01/2017	12/04/2017

Recommendation
The London Plan should build in some flexibility in the wording of the policies to allow for opportunities whilst stating release and intensification shall normally be via local plan reviews.

User: London Industrial and Logistics Sounding Board

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

We support what we believe to be the overarching aim of this policy, to encourage more efficient use of land in employment areas and enable better integration of industry, logistics and other uses. This will potentially make industry a more visible and recognised part of London.

Whilst we welcome the encouragement of innovation in industrial and logistics development, we are concerned that the policy's principles are as yet untested in London both from a development and an occupier/operator perspective and are unlikely to be achievable on all sites for various reasons including development viability, site size and layout or development constraints. While the sector welcomes opportunities to explore innovative approaches, the practicalities of operational requirements need to be taken into account, for example when developing cross-dock facilities, large logistics hubs, and designing servicing and yard space. The financial realities of capital investment and pre-lets to incentivise development need to be considered. As such, this policy is unlikely to be the silver bullet that will deliver sufficient industrial capacity nor optimise the potential growth from highly accessible locations such as transport corridors, transport hubs, town centres and OAs.

Intensification is only likely to work in areas where there is high demand. This will ensure that the costs of delivering multi-storey schemes can be recouped through rental income. New formats of industrial uses are, as yet, untested in a London market and again may only be attractive to occupiers where there is a lack of alternative space in the area. Most importantly, innovative forms of industrial and logistics space, such as multi-storey development will only work where they where they can be viably delivered. We are therefore concerned that there is limited evidence to demonstrate if and where this innovative type of development will work in London. The GLA should undertake more work on this matter and clarify pre-Examination in public how and where intensified industrial uses can be viably delivered.

The intensification and co-location should be industrial led and not residential led – for the design of new industrial and logistics development to work adjacent to residential it must be given priority in terms of its operational needs. The policy should recognise that co-location with some uses may not be compatible with residential such as cross docking facilities.

User: London Industrial and Logistics Sounding Board

The development of mezzanines (Policy E7 part A1) is occupier-driven and, when considering the ‘no net loss of floorspace’ principle, should not be considered as replacement of industrial floorspace with appropriate floor loading and eaves heights.

Part C of the policy should use clearer terminology, for example, does intensification mean mixed use development or more intensive use for industrial and logistics use? Is the intensification intended to provide the capacity for introducing residential uses through co-location? Does co-location mean the separation of industrial and residential uses or can this mean residential uses above a logistics hub for example? Better definitions should be provided so as to avoid any confusion in the interpretation and application of this policy.

The plan should allow boroughs to identify new industrial sites in appropriate locations such as near arterial routes, adjacent to rail, air and water interchanges, in and around town centres and appropriately sized logistics hubs within OAs. In some circumstances, it may be appropriate to use land use swaps or bottom up reviews to release low grade previously developed brownfield land including greenbelt locations through the local plan process, subject to a robust evidence base. These new sites can then be used to rebalance against any losses of industrial capacity to enable mixed use development including residential to come forward.

User:	London Industrial and Logistics Sounding Board

The 50% threshold for SIL and LSIL sites will mean that most sites will need to go through the viability tested route. We do not consider that it reflects the costs of delivering intensified industrial uses and may act as a deterrent to intensification of existing sites and potentially slow the speed of housing delivery. The plan should therefore clarify if this is the intention of the proposed threshold. This policy objective could also undermine the plan's other objectives to seek to deliver affordable workspace through Section 106 obligations. In certain locations, there may also be opportunities for co-location of non-residential uses – such as offices – on industrial sites. This policy should encourage local authorities to work with local businesses and land owners to identify such areas in their Local Plans.

User:	Brixton Society
E7, Intensification and Co-location: We are in favour of making more intensive use of employment sites. However, we are concerned at the trend to squeeze together ground-floor employment with dense residential development on upper floors. Such developments demand careful consideration of servicing requirements, removal of wastes and fumes, noise and operating hours. Otherwise the employment uses are likely to be displaced as a result of complaints from residents experiencing a poor living environment.	

User: Silvertown Homes

We support the suggestion that Development Plans and planning frameworks are proactively used to identify LSIS that could be intensified and co-located with residential and other uses. However, we consider that the second half of Part C should be deleted to allow for greater flexibility.
With respect to Part F, in view of London's 'housing crisis' we consider that this policy should be revised to support planning applications for intensified and co-located floorspace with residential and other uses coming forward where these are supported by a comprehensive masterplan and where they benefit from support by the Borough and the GLA's planning decisions unit.

Delete and amend policy in line with comments.

User: Silvertown Homes

Part E of Policy E7 seeks that where other uses (including residential) are introduced into industrial sites then there should be ‘an increase (or at least no overall net loss) of capacity in terms of industrial, storage and warehousing floorspace’. Paragraph 6.4.5 states that ‘floorspace capacity is defined here as either the existing industrial and warehousing floorspace on site or the potential industrial and warehousing floorspace that could be accommodated on site at a 65 per cent plot ratio (whichever is the greater)’.

We are aware that others making representations to the London Plan will provide numerical evidence on this point but all are in agreement that a 65 per cent will almost always if not always exceed the actual plot ratio of any given site. The effect of the approach outlined above is that this policy approach will nearly always (if not always) require an uplift in the provision of Class B2 or Class B8 floorspace, at the same time as the site is to be developed to accommodate other uses.

If this policy approach is to be retained (and it may not be appropriate to do so, given the need to identify sufficient land to accommodate new homes) then it must be revisited to revisit or remove the reference to plot ratio.

The effect of the draft approach will be that it will make development less likely to proceed and where it does proceed will mean less alternative (i.e. not B2 or B8) floorspace being provided (including fewer homes).

We are aware that others making representations to the London Plan will provide numerical evidence on this point but all are in agreement that a 65 per cent will almost always if not always exceed the actual plot ratio of any given site. The effect of the approach outlined above is that this policy approach will nearly always (if not always) require an uplift in the provision of Class B2 or Class B8 floorspace, at the same time as the site is to be developed to accommodate other uses.

User: John Lewis Partnership

Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function *page 246*

Intensification

While we support intensification and efficient use of land, planning policy also needs to ensure that there is sufficient access and land available for logistics operations to underpin London's economic activity. The approach proposed in the draft Plan does not work for many logistics operations. However, there may be opportunities here for other industrial uses and there should be clear examples and case studies of where this works and where is it less appropriate.

Co-location

Where there are mixed use developments, these ideally should be industrial developer-led to ensure that they are developed in a way that supports both mixed residential and industrial use, to support good growth.. he plan needs to be specific about which uses can be co-located and which cannot.

Substitution
Land will always have a higher value for residential over industrial/logistics uses, therefore it is important that all avenues are explored before any release for other purposes.

User: Vital OKR

A
Development Plans and development proposals should be proactive and encourage the intensification of business uses in Use Classes B1c, B2 and B8 occupying all categories of industrial land through:

1. development of mezzanines
2. introduction of small units
3. development of multi?storey schemes
4. addition of basements
5. more efficient use of land through higher plot ratios having regard to operational requirements (including servicing) and mitigating impacts on the transport network where necessary.

B
Development Plans and planning frameworks should be proactive and consider, in collaboration with the Mayor, whether certain logistics, industrial and related functions in selected parts of SILs could be intensified. Intensification should facilitate the consolidation of the identified SIL to support the delivery of residential and other uses, such as social infrastructure, or to contribute to town centre renewal. This process must meet the criteria set out in part E below and ensure that it does not undermine or compromise the integrity or effectiveness of the SIL in accommodating the industrial?type activities identified in part C of Policy E5 Strategic Industrial Locations (SIL). This approach should only be considered as part of a plan?led process of SIL intensification and consolidation (~~and~~ with the areas affected clearly defined in Development Plan policies maps) ~~or as part of~~ supported by a coordinated masterplanning process in collaboration with the GLA and relevant borough, that closely involves relevant businesses, and not through ad hoc planning applications.

(Masterplanning processes should support and feed into Local Plan preparation, as Local Plan preparation has a reasonably fair process (staged consultation, independent inspector etc). Masterplanning process is not an acceptable instead of option, that opens the way to Gunning principles violation a?la OKR current process. It is important to emphasise that businesses should be asked, involved, consulted)

C
Development Plans and planning frameworks should be proactive and consider whether certain logistics, industrial and related functions in selected parts of LSIS could be intensified and/or co?located with residential and other uses, such as social infrastructure, or to contribute to town centre renewal. This process should meet the criteria set out in part E below. This approach should only be considered as part of a plan?led process of LSIS intensification and consolidation (~~and~~ clearly defined in Development Plan policies maps) ~~or as part of~~ supported by a co?ordinated masterplanning process in collaboration with the GLA and relevant borough, that closely involves relevant businesses, and not through ad hoc planning applications.

[remainder unchanged]

User: Vital OKR

In collaboration with the Mayor, boroughs are encouraged to explore the potential to intensify industrial activities on industrial land and consider whether some types of industrial activities (particularly light industrial) could be co?located or mixed with residential and with other non?residential uses (for example in town centres and predominantly residential areas). Through Local Plans, boroughs should also take a proactive approach to the management of vacancy rates to reach a level appropriate to the efficient functioning of the industrial market (considered to be five per cent for land and eight per cent for floorspace).

(Suggested to match wording to the clear intent that industrial should be present across London at a small as well as a larger scale, and should not be ever more concentrated in big industrial areas. Wording should encourage a filigree of industrial accommodation, such as weaved in with residential development, within high street settings (the town centre network), and on assorted small scraps of land everywhere).

User: Vital OKR

Whilst ~~the majority of land in SILs~~ most industrial land should be retained and intensified for the industrial?type functions set out in part C of Policy E5 Strategic Industrial Locations (SIL), there may be scope for selected parts of SILs or LSISs to be consolidated. This should be done through a carefully co?ordinated plan?led approach (in accordance with parts B, C and E of Policy E7 Intensification, co?location and substitution of land for industry, logistics and services to support London's economic function) to deliver an intensification of industrial and related uses in the consolidated SIL or LSIS and facilitate the transfer of some land for a mix of uses including residential. Local Plan policies' maps and/or OAPFs should indicate clearly: (i) the area to be retained and intensified as SIL or LSIS (and to provide future capacity for the uses set out in Policy E5 Strategic Industrial Locations (SIL) and Policy E6 Locally Significant Industrial Sites) and (ii) the area to be removed from SIL or LSIS (see illustrative examples in Figure 6.3). To ensure that such development works effectively, there should be a development agreement in place between a residential and industrial developer to support this process. In order to follow the Fast Track Route (see Policy H4 Meanwhile use), industrial sites will need to meet the 50 per cent threshold for affordable housing.

(To be consistent with the no nett loss as a whole policy that the evidence base supports)

User:	Vital OKR

Outside of areas designated as SIL or LSIS there may be opportunities to deliver a mix of industrial and residential (or other uses) on the same site either side?by?side or through vertical stacking. Mixed?use and residential development proposals on existing Non?Designated Industrial Sites should ensure either that there is no reasonable prospect of the site being used for logistics/ industrial purposes, or incorporate light/general industrial or storage/distribution uses or put in place suitable relocation arrangements for any businesses/operations affected.

(Industrial can be mixed with all sorts of uses, often more easily with other non?residential uses than with residential. Why not industrial weaved together with a school, or next to / under office accommodation, or linked to retail? The plan should encourage such innovations)

User:	Vital OKR

Collaborative working between the Mayor, boroughs and other stakeholders (including industrial businesses) on Development Plan reviews, planning frameworks and masterplans provide useful mechanisms to co?ordinate these processes. This should ensure that the need to maintain sufficient capacity for London's industry, including that which services ~~to service~~ London's economy and residents is considered alongside other planning objectives including delivery of strategic infrastructure, housing, social infrastructure and other uses.

(Not much talking to the businesses has been happening. The Mayor should encourage more. The role of London's industry does indeed include servicing London's economy and residents, but it does much more that that.)

User: Barratt Developments plc

Mixed LSIS and intensification masterplans

We support the suggestion that Development Plans and planning frameworks are proactively used to identify LSIS that could be intensified and co-located with residential and other uses. However, we consider that the second half of Part C should be deleted to allow for greater flexibility.

With respect to Part F, in view of London's 'housing crisis' we consider that this policy should be revised to support planning applications for intensified and co-located floorspace with residential and other uses coming forward where these are supported by a comprehensive masterplan and where they benefit from support by the Borough and the GLA's planning decisions unit.

Delete and amend policy in line with comments.

User: Barratt Developments plc

Part E of Policy E7 seeks that where other uses (including residential) are introduced into industrial sites then there should be ‘an increase (or at least no overall net loss) of capacity in terms of industrial, storage and warehousing floorspace’ . Paragraph 6.4.5 states that ‘floorspace capacity is defined here as either the existing industrial and warehousing floorspace on site or the potential industrial and warehousing floorspace that could be accommodated on site at a 65 per cent plot ratio (whichever is the greater)’.

We are aware that others making representations to the London Plan will provide numerical evidence on this point but all are in agreement that a 65 per cent will almost always if not always exceed the actual plot ratio of any given site. The effect of the approach outlined above is that this policy approach will nearly
always (if not always) require an uplift in the provision of Class B2 or Class B8 floorspace, at the same time as the site is to be developed to accommodate other uses.

If this policy approach is to be retained (and it may not be appropriate to do so, given the need to identify sufficient land to accommodate new homes) then it must be revisited to revisit or remove the reference to plot ratio. The effect of the draft approach will be that it will make development less likely to proceed and where it does proceed will mean less alternative (i.e. not B2 or B8) floorspace being provided (including fewer homes).

User: London Borough of Newham

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

LBN are generally supportive of the policy which is complementary to Newham's Draft Revised Local Plan, particularly Policy J2 which seeks a plan-led and managed approach to employment land. LBN agree the management of industrial land should involve plan-led intensification and release.

However, as part of this, it would be helpful, similar to the annex on town centres with sector growth potential, to identify which SILs the GLA consider suitable for intensification. It would also be clearer to separate out industrial intensification and intensification that facilitates release for housing. In particular the former should be encouraged on all sites to secure additional industrial capacity (with appropriate safeguarding of functionality), and the latter in defined places given the difficulties of finding new industrial land. There should perhaps be a distinction between intensification on SILs and LSISs: the approach in Newham for instance is that certain LSISs have been identified as more appropriate for employment-led mixed use (Local Mixed Use Areas or LMUAs) rather than sole protection as industrial. These different categorisations are recognised as all working together to support growth and change.

It is also felt that co-location is not a particularly clear term, and clarification should be given as to in what circumstances and formats it is envisaged e.g. vertical mixed use, or closer proximity (side by side mixed use is not particularly new). Substitution is not that intuitive a term either – when what is actually being referred to is decentralisation or land-swapping. Generally Part F seems rather unworkable in light of other objectives such as air quality improvement, and disbenefits such as loss of local jobs and different service areas.

Parts D & E return to the issue of non-designated sites, which is confusing – again this would be better dealt with in one 'non-designated sites' policy. It is also unclear how it sits with Policy H2 on small sites, for example, the term 'underused' which would seem to weaken protection

User:	London Borough of Sutton

SUPPORT. The London Borough of Sutton supports Policy E7 with regard to the intensification of industrial areas, subject to its comments to Policy E5, and the council welcomes the overall cautiousness of the policy to co-locating industrial and residential uses. The co-location of industrial and residential uses will only be appropriate to both uses in very few circumstances and must be carefully considered.

User: PRP

Policy E7 envisages that there may be opportunities to deliver a mix of industrial and residential on the same site either 'side-by-side or through vertical stacking'.

Figure 6.3 shows a simplified illustration of approaches to SIL/LSIS consolidation but in reality this is unrealistic and an extremely unlikely scenario. By their very nature industrial sites are inherently complex and constrained and a one size fits all approach is not helpful. The vertical stacking of B8 would not be acceptable in operational terms to most industrial occupiers or investors. The transition phase as illustrated in figure 6.3 with the new B8 being brought forward prior to residential is extremely unlikely to work in viability terms and most developers would require the new residential to be brought forward first, or at the very least alongside the new B8 uses to make a scheme acceptable.

The concept of co-locating industrial uses alongside residential is complex and requires a high degree of pragmatism and flexibility of design criteria. This must be reflected in the supporting text associated with policy E7.

User: Owners and Tenants of Cygnus Business Park

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

5.25 We support the objectives of this policy and its endorsement of the proactive identification and encouragement of the intensification of uses; particularly where development supports the growing need for residential and other uses such as social infrastructure. We do however question the:
a. application of this policy to sites outside of use class B1(c), B2 and B8 but within LSIS designations;
b. reliance on plan-led LSIS intensification and co-location;
c. effectiveness of this policy in securing intensification on LSIS.

5.26 Part C of Policy E7 relates to intensification and/or co-location with residential and other uses in designated LSIS. As highlighted at para 3.11 above, LSIS designations often contain a variety of uses outside of the B1(c), B2 and B8 uses such as B1(a) and (b), Class A and sui generis uses. This policy needs to be reflective of the diverse nature of these areas, providing greater clarity as to how this policy applies to uses outside of B1(c), B2 and B8, ensuring it does unduly inhibit the development potential or intensification of these sites.

5.27 The wording of part C of this policy is exceptionally prohibitive, discouraging and restricting proactive developers and inhibiting potential growth and intensification opportunities within LSIS. To make the most efficient use of this land through the intensification and co-location of uses, this policy needs to acknowledge and support appropriate development-led projects, which are often faster to respond to market signals and changes. Considering the above, it is suggested that an alternative approach be applied, encouraging developers to optimise the use of industrial land, through the preparation of appropriate masterplans and design codes (in line with Policy D2: Delivering good design) demonstrating the appropriateness of the site and its compliance with part E of the policy.

5.28 The policy in its current form is unsound because it is ineffective. To address this and the concerns raised above, the following alterations are suggested in respects to part C of Policy E7:

C. Development Plans and planning frameworks should be proactive and consider whether certain logistics, industrial and co-located uses (outside of B1(c), B2 and B8) in selected parts of LSIS could be intensified and/or co-located with residential and other uses, such as social infrastructure, or to contribute to town centre renewal. This process should meet the criteria set out in part E below. Boroughs, through their Development Plan, should ensure that proposals for industrial intensification and/or co-location, be accompanied by a masterplan and design code, clearly demonstrating compliance with part E below and integration with the existing community. Alternatively, such sites may be ~~This approach should only be~~ considered as part of plan-led process of LSIS intensification and consolidation (and clearly defined in Development Plan policies maps) or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough, ~~and not through ad hoc planning applications.~~

5.29 We also question the appropriateness of using floorspace as the sole measure of intensification in the context of mixed use industrial redevelopment. As stated in paragraph 1.2.1 of the draft Plan, employment in London is expected to increase on average by 49,000 jobs each year, with a projected growth of 6.9 million jobs by 2041; requiring economic diversification and the most efficient use of land. Given the above, and the Mayor's imperative to meet these employment requirements, it is recommended that part E this be altered to take into account the existing and potential employment capacity or such sites.

E. The processes set out in Parts B, C and D above must ensure that:
1) the industrial uses within the SIL or LSIS are intensified to deliver an increase (or at least no overall net loss) of capacity in terms of employment capacity industrial, storage and warehousing floorspace with appropriate provision of yard space for servicing. Where this cannot justifiably be provided, it must be demonstrated that the re-development will result in a cumulative uplift of employee capacity on the site.

5.30 As is the case at our client's land at Cygnus Business Park any potential redevelopment and co-location of residential, industrial and commercial elements is unlikely to be able to achieve a net increase in industrial floorspace. It does however present the opportunity to optimise employment growth (in terms of job numbers), whilst retaining B1(a) and B1(c) uses and contributing towards housing needs of Brent and the Greater London Area. The scope for redevelopment of this site is therefore, on balance, considered to make a significantly more efficient use of land, as compared to its current use.

User:	Durkan

Policy SD1 (Opportunity Areas) calls for opportunities to intensify and make more efficient use of Strategic Industrial Locations, and Policy E7 (intensification, co-location and substitution of land for industry, logistics and services to support London's economic function) allows for mixed-use or residential development on Non-Designated Industrial Sites in certain circumstances.

The ability to introduce a mix of uses on Non-Designated Industrial Sites is welcomed. However, it is considered that these emerging policies fail to capitalise on the potential to advance residential and mixed use development on other employment sites, or recognise future opportunities that may emerge from innovation

User: Kesslers Stratford Limited

Kesslers welcomes how this policy acknowledges that Locally Significant and other industrial sites can be intensified and land uses substituted.

In order to deliver intensification of uses and additional capacity, balanced with the need to deliver significant number of homes, Policy E7 proposes a range of strategies, including the development of mezzanine floors, smaller units, multi-storey schemes, basements, and more efficient use of yard space and servicing space. Whilst clearly intensification of B1c, B2 and B8 uses on industrial land are to be welcomed, Kesslers are concerned about the negative effect that this intensification will have on new residential neighbourhoods and also about the user and financial challenges that this intensification will create. Kesslers believe that the solution to these issues will be through the achievement of a balance of uses appropriate to the locality.

Kesslers are concerned that criteria E1 places an unreasonable burden on the redevelopment of these sites by requiring the re-provision of industrial, storage and warehousing floorspace. In many instances, sites are being redeveloped because the site is no longer suitable for the type of employment floorspace that currently exists. Like at Kessler's site in Stratford, sites may be vacant or under-occupied because of structural changes in the industrial market. A more appropriate test is whether the re-provided floorspace is providing equivalent employment. This will enable new space to be re-provided taking into account modern occupier requirements and will allow the density of housing or other uses on the site to be optimised having regard to other policy requirements.

With Criteria E1 in place it will be extremely challenging to evolve a commercially viable and market facing mixed use scheme with a requirement for re-provision of industrial, storage and warehousing floorspace. There is potential for this policy may generate development schemes that have no user demand at the price necessary to be commercially sustainable. The risk is that re-development of existing sites will not be viable and the investment necessary to provide the appropriate spaces will not materialise.

Part F of the policy should be revised to clarify that supplementary planning guidance can be an appropriate mechanism for the substitution of sites, rather than the 'plan-led' approach referred to. This will allow a more responsive approach to planning in local areas which is not tied to the review cycle of local plans.

User: Provewell Limited

Part D

Mixed-use or residential development proposals on Non-Designated Industrial Sites will be supported where:
1. there is no reasonable prospect of the site being used for the industrial and related purposes set out in part A of Policy E4 Land for industry, logistics and services to support London's economic function; or
2. it has been allocated in a Development Plan for residential or mixed-use development on the basis of part D.1; or
3. industrial, storage or distribution floorspace is provided as part of mixed-use intensification where this is feasible; or
4. suitable alternative accommodation (in terms of type, specification, use and size) is available in reasonable proximity to the development proposal and subject to relocation support arrangements for existing businesses before the commencement of new development. Mixed-use development proposals on Non- Designated Industrial Sites which co-locate industrial, storage or distribution floorspace with residential and/or other uses should also meet the criteria set out in parts E.2 to E.4 below

This is supported by Provewell Ltd.

Part E.1: The industrial uses within the SIL or LSIS are intensified to deliver an increase (or at least no overall net loss) of capacity in terms of industrial, storage and warehousing floorspace with appropriate provision of yard space for servicing

No comment.

Part E.2: The industrial and related activities on-site and in surrounding parts of the SIL, LSIS or Non- Designated Industrial Site are not compromised in terms of their continued efficient function, access, service arrangements and days/hours of operation noting that many businesses have 7-day/24-hour access and operational requirements

This could contravene the feasibility of colocation. Specifically, it may not be viable to introduce residential/mixed-uses without compromising the days/hours of
operation, particularly for those businesses which operate on a 7- day/24-hour basis. This is due to the sensitivity of residential/mixeduses to amenity impacts.

Part E.3: The intensified industrial, storage and distribution uses are completed and operational in advance of any residential component being occupied

This may raise financial viability issues for developers and would therefore prevent such schemes from coming forward.

Part E.4: Appropriate design mitigation is provided in any residential element to ensure compliance with 1 and 2 above with particular consideration given to:

a. safety and security (see Policy D10 Safety, security and resilience to emergency and Policy D11 Fire safety)
b. the layout, orientation, access, servicing and delivery arrangements of the uses in order to minimise conflict (see Policy T4 Assessing and mitigating transport impacts)
c. design quality, public realm, visual impact and amenity for residents (see Policy D1 London's form and characteristics, Policy D2 Delivering good design, Policy D3 Inclusive design, Policy D4 Housing quality and standards, Policy D5 Accessible housing, Policy D6 Optimising housing density, Policy D7 Public realm and Policy D8 Tall buildings)
d. vibration and noise (see Policy D13 Noise)
e. air quality, including dust, odour and emissions (see Policy SI1 Improving air quality and Policy SI2 Minimising greenhouse gas emissions).

No comment.

Provewell supports the principle of co-location, however my client requests that the requirements detailed in Part E of the policy are amended to allow greater flexibility for colocation developments. It is considered that these requirements are restrictive to co-location developments as it is likely to raise feasibility issues for developers and excessive complications for councils to determine such applications. This may prevent co-location schemes from coming forward and thus, the restrictive nature of this policy may contravene one of its key purpose. It should be noted that there is a strong demand for co-location, as outlined in the evidence base document London Industrial Land Demand Study. Therefore, Provewell requests that the criteria listed in Part E of the policy are simplified to provide greater flexibility for co-location schemes to come forward successfully.

User: Dagenham Dock Limited

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

Draft Policy E7 seeks to consider options for the intensification of logistics, industrial and related-functions on industrial sites, in addition to the colocation of industrial and residential uses. At this stage, DDL strongly object to Draft Policy E7c which states that the intensification or consolidation of LSIL is only acceptable as part of a Masterplanning process in collaboration with the GLA or relevant borough, and not through ad-hoc planning applications. The Draft London Plan pays no regard to development proposals that have been progressing and subject to pre-application discussions under the previous London Plan and subsequent Opportunity Area Planning Frameworks (for example the London Riverside OAPF). The requirement for extensive masterplanning beyond that already established in the Planning Frameworks will detrimentally impact on the progression and subsequent delivery of strategic schemes in London.

Further, the consideration of co-located industrial and residential development on LSIL sites is unlikely to work in practice due to physical and financial constraints. The demand for such sites and space will be driven by alternative forms of industrial space in the borough. DDL believe that at this stage, insufficient research and a supporting evidence base has been conducted by the GLA to demonstrate the practicalities of colocation and the attractiveness to the market.

User: DTZ Investors

Concern is expressed that draft Policy E7 is unduly restrictive in focusing on the intensification of just (Class B1c, B2 and B8) industrial uses within LSIS, as this conflicts with the allowance under Draft Policy E6 for boroughs to “make clear the range of industrial and related uses that are acceptable in LSIS” and could result ‘missed opportunities’ deliver a substantial uplift in jobs from other commercial uses, including SMEs with Class B1a or related sui generis uses.

Objection is also raised that the London Plan should not be used to protect all existing unallocated industrial sites

It is considered that protecting undesignated industrial sites (including low-intensity sites with low-employment levels) and requiring (under Part D(1) of the policy) that allocations and applications seek to retain industrial uses, would unduly restrict London Boroughs from developing their own locally-appropriate strategies for development of employment land, potentially compromising the delivery of a significant uplift in jobs from alternative commercial uses as well as the provision of new housing to meet identified needs.

Change Sought - Draft policy E7 should make allowance for boroughs to review their existing LSIS allocations (under draft Policy E6) to deliver mixed use regeneration of sites in a co-ordinated manner, including the potential for appropriate release of land within LSIS (offset by intensification of industrial uses on other sites) in order to achieve wider regeneration objectives.

It is considered that the London Plan should not protect non-designated industrial sites as, by definition, these do not merit strategic protection.

User: DTZ Investors

Policy H5: Delivering affordable housing & Policy H6: Threshold approach to applications

It is accepted that affordable housing from residential and mixed-use developments should generally be sought on-site [as long as the mixed use development includes residential provision that triggers an affordable housing requirement in itself]. However, the requirement of part B of draft Policy H5 that affordable housing should be delivered on-site does not acknowledge that it is not always practicable or viable to secure mixed tenure housing provision within mixed use schemes on constrained sites, particularly in central London.

The policy also does not recognise that development proposals in central London can often secure more and better quality affordable housing through off-site provision, through development in the vicinity of the application site, or elsewhere if funded by a contribution in lieu of provision. As off-site delivery of affordable housing is relatively common in central London, it is considered too inflexible for Policy H5 to allow off-site provision or a contribution in lieu of provision only in exceptional circumstances.

In seeking to deliver affordable housing under draft Policy H5, serious concern is also expressed that the accompanying draft policy H6 sets a threshold level for affordable housing provision at 50% for Strategic Industrial Locations (SILs), Locally Significant Industrial Sites (LSIS) and other industrial sites deemed appropriate to release for other uses, in order to benefit from the Mayor's Fast Track Route (whereby applications for major residential developments are not be required to submit viability assessments for review).

Policy E7 of the draft London Plan, advises Development Plans and planning frameworks should consider "whether certain logistics, industrial and related functions" in selected parts of SILs and LSIS "could be intensified and/or co-located with residential and other uses, such as social infrastructure, or to contribute to town centre renewal." However, critical to this approach is the requirement of Part E of the policy for "an increase (or at least no overall net loss) of capacity in terms of industrial, storage and warehousing floorspace with appropriate provision of yard space for servicing."

The requirement for redevelopment schemes within SIL or LSIS to retain or increase industrial, storage and warehousing floorspace and provide service yards, presents a significant constraint for redevelopment of these sites, with the need for careful design to accommodate these employment uses alongside residential development and the need for yard areas inevitably reducing the level of market housing that can be delivered on site, with a significant impact on viability for redevelopment. Additionally, active and passive extensive noise mitigation measures for SIL and LSIS site will be required to ensure industrial activities are not compromised by residential development in accordance with to the 'Agent of Change Principle' to be followed under draft Policy D12.

Coupled with the likelihood that housing on sites alongside industrial uses is also likely to secure lower revenues for developers than in established residential areas, the effect of these measures will inevitably make redevelopment of these sites more challenging and squeeze the viability of redevelopment schemes, which could compromise the development of emerging new communities and the regeneration of areas (in particular Opportunity Areas with substantial levels of protected industrial land).

The basis for setting of a 50% affordable housing requirement for proposals on Strategic Industrial Locations, Locally Significant Industrial Sites and other industrial sites to benefit from the Fast Track route (without the need for a viability assessment) instead of the 35% for development of all land not in public ownership will be likely to mean that all major schemes for redevelopment of these sites are likely to require viability appraisals to demonstrate how this level of affordable housing provision cannot be achieved. This requirement is likely to significantly to slow up the determination of planning applications (and add significant costs) and in turn delay the delivery of new housing and employment. The effect of this approach will be particularly felt in Opportunity Areas, which are expected to contribute to the delivery of circa 87% of the total housing in London over the next 10 years. (568,000 of 650,000 units) and thus the proposed policy could compromise achieving the Mayor's ambitious proposed housing targets.

Change Sought – It is requested that draft Policy H5 provide greater flexibility by explicitly recognising that within inner London off-site affordable housing provision may be considered acceptable where it can be demonstrated that this would lead to an improvement to the quantity or quality of affordable housing provision compared to that which might be practically and viably achieved on-site. Recognition should also be made to a payment in lieu of provision being deemed acceptable where either on-site or off-site provision is not practicable or viable.

It is also requested that Part (B)3 of draft Policy H6 be deleted to remove reference to a threshold level of affordable housing for residential development of Strategic Industrial Locations, Locally Significant Industrial Sites and other industrial sites being set at 50% in order to benefit from the Mayors Fast Track Route, in favour of applying the 35% threshold to all land not in public sector ownership.

This comment is regarding H5 and relates to H6, E7 and D12.

Policy H5: Delivering affordable housing & Policy H6: Threshold approach to applications

It is accepted that affordable housing from residential and mixed-use developments should generally be sought on-site [as long as the mixed use development includes residential provision that triggers an affordable housing requirement in itself]. However, the requirement of part B of draft Policy H5 that affordable housing should be delivered on-site does not acknowledge that it is not always practicable or viable to secure mixed tenure housing provision within mixed use schemes on constrained sites, particularly in central London.

The policy also does not recognise that development proposals in central London can often secure more and better quality affordable housing through off-site provision, through development in the vicinity of the application site, or elsewhere if funded by a contribution in lieu of provision. As off-site delivery of affordable housing is relatively common in central London, it is considered too inflexible for Policy H5 to allow off-site provision or a contribution in lieu of provision only in exceptional circumstances.

In seeking to deliver affordable housing under draft Policy H5, serious concern is also expressed that the accompanying draft policy H6 sets a threshold level for affordable housing provision at 50% for Strategic Industrial Locations (SILs), Locally Significant Industrial Sites (LSIS) and other industrial sites deemed appropriate to release for other uses, in order to benefit from the Mayor’s Fast Track Route (whereby applications for major residential developments are not be required to submit viability assessments for review).

Policy E7 of the draft London Plan, advises Development Plans and planning frameworks should consider “whether certain logistics, industrial and related functions” in selected parts of SILs and LSIS “could be intensified and/or co-located with residential and other uses, such as social infrastructure, or to contribute to town centre renewal.” However, critical to this approach is the requirement of Part E of the policy for “an increase (or at least no overall net loss) of capacity in terms of industrial, storage and warehousing floorspace with appropriate provision of yard space for servicing.”

The requirement for redevelopment schemes within SIL or LSIS to retain or increase industrial, storage and warehousing floorspace and provide service yards, presents a significant constraint for redevelopment of these sites, with the need for careful design to accommodate these employment uses alongside residential development and the need for yard areas inevitably reducing the level of market housing that can be delivered on site, with a significant impact on viability for redevelopment. Additionally, active and passive extensive noise mitigation measures for SIL and LSIS site will be required to ensure industrial activities are not compromised by residential development in accordance with to the 'Agent of Change Principle' to be followed under draft Policy D12.

Coupled with the likelihood that housing on sites alongside industrial uses is also likely to secure lower revenues for developers than in established residential areas, the effect of these measures will inevitably make redevelopment of these sites more challenging and squeeze the viability of redevelopment schemes, which could compromise the development of emerging new communities and the regeneration of areas (in particular Opportunity Areas with substantial levels of protected industrial land).

The basis for setting of a 50% affordable housing requirement for proposals on Strategic Industrial Locations, Locally Significant Industrial Sites and other industrial sites to benefit from the Fast Track route (without the need for a viability assessment) instead of the 35% for development of all land not in public ownership will be likely to mean that all major schemes for redevelopment of these sites are likely to require viability appraisals to demonstrate how this level of affordable housing provision cannot be achieved. This requirement is likely to significantly to slow up the determination of planning applications (and add significant costs) and in turn delay the delivery of new housing and employment. The effect of this approach will be particularly felt in Opportunity Areas, which are expected to contribute to the delivery of circa 87% of the total housing in London over the next 10 years. (568,000 of 650,000 units) and thus the proposed policy could compromise achieving the Mayor's ambitious proposed housing targets.

Change Sought – It is requested that draft Policy H5 provide greater flexibility by explicitly recognising that within inner London off-site affordable housing provision may be considered acceptable where it can be demonstrated that this would lead to an improvement to the quantity or quality of affordable housing provision compared to that which might be practically and viably achieved on-site. Recognition should also be made to a payment in lieu of provision being deemed acceptable where either on-site or off-site provision is not practicable or viable.

It is also requested that Part (B)3 of draft Policy H6 be deleted to remove reference to a threshold level of affordable housing for residential development of Strategic Industrial Locations, Locally Significant Industrial Sites and other industrial sites being set at 50% in order to benefit from the Mayors Fast Track Route, in favour of applying the 35% threshold to all land not in public sector ownership.

This comment is regarding H5 and relates to H6, E7 and D12.

User: London Borough of Ealing

Intensification, Co-Location and Substitution of Land for Industry, etc.
(E7)

This policy is generally supported and introduces a welcome stimulus to development within SILs. However, the Council has similar concerns about this policy as with H2; that, while the policy is on the whole a good approach to development management, it does not solve strategic issues of land supply.

In particular, it should lead with a commitment by the Mayor to undertake long-term strategic planning for the key land use requirement of logistics which makes up 100% of London's net industrial demand.
In the absence of work from GLA on this issue the Council has now commissioned a fundamental review of logistics demand and supply with partners in West London.

Intensification, Co-Location and Substitution of Land for Industry, etc.
(E7 D)

This clause risks entirety undermining the plan's approach to industrial land. A simple revision will address this through the deletion of 'or residential development' from the first line of this clause so that it reads;

'Mixed-use development proposals on Non-Designated Industrial Sites will be supported where:…'

Complete loss of non-designated industrial sites will then need to be by exception to policy, and should be both greatly reduced and considerably more manageable in DM terms.

Intensification, Co-Location and Substitution of Land for Industry, etc.
(E7 F)

Substitution cannot practicably be left to individual boroughs particularly where it relates to strategic considerations such as logistics. This clause should reflect a commitment by the Mayor to lead strategic planning for logistics development in London. It remains an open question what the pattern of logistics development will be in London in the future, and as the dominant demand for industrial land it is essential that there is a planning input into its evolution.

At the least this should be reflected in the policy by adding to the opening sentence of this clause: ‘The Mayor will…’. This should also be backed up by a commitment to a long-term delivery programme for industrial intensification including joint working with industry and LPAs.

User:	Enterprise M3 Local Enterprise Partnership (LEP)

Chapter 6 - Economic Development

We note that there are multiple sites identified around Heathrow which may impact on the Enterprise M3 area within **Policy E5 Strategic Industrial Locations (SIL)** and that there is a significant amount of industrial and logistics capacity serving London that is located outside of the capital under **Policy E7**. The policy states that there may be scope for some substitution of London's industrial capacity to locations in the wider region where this results in mutual advantage, such as complementary business opportunities and transport infrastructure improvements. Whilst we would welcome this approach in principle we would seek to ensure that, as stated previously, there is a meaningful mechanism for this cooperation through joined up economic development policies between London and our area.

User: Lidl UK GmbH

Lidl is generally supportive of the contents of proposed Policy E7 which deals with the intensification, co-location and substitution of Class B land and premises. It is correct for the draft Plan to acknowledge that industrial land and premises will change over time as it responds to changes in the economy, including technology and working practices. However, Lidl considers that a number of changes are required in order to make the draft policy sound:

- Whilst protection of the SIL areas is likely to attract more strict criteria, there is no reason why LSIS sites cannot be adequately protected through the development management process.
- Sticking with rigid and inflexible SIL policies without site specific consideration s is likely to stymie employment rather than protecting employment. As a consequence, the last sentence of Part C should be deleted.
- Lidl considers that Part D offers useful criteria for the assessment of proposals for alternative land uses. However, the following changes are required:
  - The policy should not just single out residential and mixed use development proposals. It should be subject to all non-Class B land use proposals.
  - Sub-section (2) should replace the words ‘residential or mixed-use development’ with ‘alternative land uses’.
  - The words ‘mixed-use’ in the paragraph after sub-section (4) should be replaced with the words ‘alternative land use’.
- Lidl considers that, in Part E, the ‘intensification’ of industrial uses should not just be judged on the basis of floorspace. Instead, proposals should also be judged on the basis of job-creating capacity as modern industrial floorspace may be able to create and sustain the same or more jobs from a smaller physical area than older equivalent floorspace. In addition to Class B uses, it should also be noted that a Lidl foodstore typically employs circa 50 people and additional jobs are also created in its head office and regional distribution centres. In many instances, this level of job creation is more than traditional Class B existing users in industrial areas.

User: Essex County Council

As noted earlier in this response, there is scope for further collaboration surrounding the economic links between London and Essex. The LSE's migration review noted that, the economic interconnections have 'matured to a stage where almost all of it is integrated in one economic agglomeration' (LSE, Review of Research on Migration Influences and Implications for Population Dynamics in the Wider South East, page 23).

Representatives of the GLA have previously expressed an interest in facilitating moving jobs beyond London and into the WSE. As with many localities, unfortunately several towns in Essex have lost office space under existing permitted development rights, and face difficulty attracting replacement businesses as they do not necessarily consider opportunities beyond London's boundaries. High quality employers are key to sustainable local growth and there would be a mutual benefit to London and Essex councils if more jobs were created outside London so that more residents were able to live and work locally thereby easing pressure on London and the region's already strained transport network and housing. Chelmsford for example has seen an increase in recent years in the number of former London back-office insurance and finance jobs being relocated in a cluster around Chelmsford station. Conversations to further explore employment opportunities and locations within the county would be welcomed.

The County Council welcomes the commitment in the Draft London Plan for a strategically co-ordinated process to the redevelopment of land used for industry, logistics and services. Policy E7 focuses on intensification within London as well as the potential for substitution outside London where there is local agreement. As mentioned in the supporting text this should only be considered where this results in mutual advantage, such as complementary business opportunities and transport infrastructure improvement.

The three boroughs identified for limited release of industrial land and floorspace are boroughs within the Thames Gateway that link to local authorities within Essex. The limited release is based on these areas having relatively low values and high vacancy rates. Notwithstanding the general supportive position of the economy policies in the Draft London Plan (such as the aim for no net loss of industrial land uses), the application of the intensification approach needs to be applied within these three boroughs. London's industrial study highlighted that two of the three boroughs assigned for limited release (Havering and Barking & Dagenham) actually saw net increases in floorspace between 2001-2016. The report also notes that 'there are some signs that occupiers and developers who would previously only consider west London locations are now looking to the east' (CAG, London Industrial Land Demand, page 213). These factors indicate that pursuing intensification is a justified approach and the interaction between the proposed polices could be clearer in this regard.

User: Ballymore Group

Our client supports the Mayor's recognition of the ability of industrial uses to be 'co-located' or mixed with residential through intensification and considers Policy E7 to be a worthy attempt to marry key objectives of the Plan to protect existing industrial floorspace and promote the delivery of new homes. However, the wording within this draft policy and supporting text is considered to be unclear and ambiguous, which in turn will reduce the success of this initiative.

Policy E7 states that intensification of SIL and LSIS should only be considered on sites that have been specifically identified through a plan-led process or as part of a coordinated masterplanning process. As stated earlier in this representation, the term 'release' has been used in Policy E4 and E5 to describe where certain industrial lands might be identified through a plan-led approach for intensification of existing industrial uses and co-location with other uses such as residential. However, the term 'release' is not used in the main text of Policy E7 with the use of alternative terms such as 'intensify', 'co-locate' and 'consolidate'.

Paragraph 6.7.2 of the justification text for Policy E7 further adds to the confusion in terminology when it states that a plan-led approach should be used to *"deliver an intensification of industrial and related uses in the consolidated SIL or LSIS and facilitate the* ***transfer of some land*** *for a mix of uses including residential."* In advising local authorities on how to implement this approach through their Development Plan the same paragraph then suggests that the Local Plan Policies' map should indicate clearly:

1. The area to be retained and intensified as SIL and LSIS; and
2. The area to be removed from SIL or LSIS (as shown in the illustrated examples in Figure 6.3)

The illustrative examples in Figure 6.3 then show land being consolidated through multi-storey industrial development on a 'retained' portion of SIL/LSIS with the remaining portion of SIL/LSIS being 'released'.

In the first instance, it is requested that the Mayor review the terminology used within Policies E4 to E7 so that a clear distinction can be made between the 'Limited Release' of SIL/LSIS identified to take place in Newham, Havering and Barking and Dagenham and the consolidation / intensification / co-location approach promoted more generally across all of London for some SIL/LSIS sites through a plan-led approach.

Secondly, it would be extremely difficult and indeed premature in most cases for the Local Plan policies' map and/or OAPFs to clearly indicate which portion of a SIL/LSIS site should be retained and which should be released, as currently required by Policy E7. To successfully implement such a requirement would require detailed masterplanning work to be undertaken to establish the most appropriate layout and distribution of uses across the site. This level of analysis would often not be available in advance of Plan preparation.

It would instead be simpler and more effective to retain the SIL/LSIS designation within an overall site allocation boundary until such time as a scheme has come forward that successfully implements the intensification and consolidation approach to the Council/GLA's satisfaction. Any approved or implemented development could then be reflected in an updated Policies Map at a later stage. It is therefore recommended that paragraphs 6.7.2 of the justification text for Policy E7 and Section C-C of Figure 6.3 are amended to reflect this approach.

User:	Wokingham Borough Council

WBC notes the intention of Policy E7/F that LPAs' development plans should look at the potential to relocate industrial capacity to neighbouring authorities. While the thrust of the policy is acceptable there is little evidence of the availability of receptor sites to take the displaced industrial capacity. Certainly in Berkshire, and probably across much of the Home Counties there is very little land available or suitable for such uses. As a result, while the principle of the policy is acceptable there is concern as to whether it will in fact be implementable.

User: Diagon Ltd, John Oughton and Bob Perdeaux

Industrial land

The Draft London Plan sets a principle of no overall net loss of industrial floorspace in designated industrial locations, which is also reflected in the Bexley Growth Strategy. Bexley is one of several boroughs within the East London sub-region that account for a large proportion of total industrial land supply in London. As surveyed in 2015 it had 560 hectares of industrial land and approximately a fifth of this was vacant or in non-industrial use. Bexley's Growth Strategy has identified surplus industrial land, including SIL around transport nodes that can be released for residential and mixed use development. It sets out that the principle of no overall net loss of floorspace will be achieved through the intensification of the remaining industrial areas to ensure they are used more effectively and efficiently.

It is our clients view that this process would represent a strategically co-ordinated process of SIL consolidation as set out in Policy E5 Part D. However, they are concerned that the detailed processes set out in Policy E7, as currently drafted do not fully reflect this. Our clients consider that this Policy should clearly set out proces for identifying areas of SIL within a Borough for intensification to enable release of SIL in locations that are well connected and suitable for delivery of homes.

As such we suggest the following modification to Policy E7.

(Insert new Part B and re-order subsequent Parts)

B. Development Plans should be proactive in identifying areas of SIL or LSIS that are particularly well suited for intensification of business uses Use Classes B1c, B2 and B8. Such Intensification should enable release of SIL or LSIS in other parts of the borough that are well connected to public transport and town centres, in order to deliver new homes as part of a plan led process and monitored to ensure no net loss of industrial capacity overall.

User: DPDgroup UK Ltd

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

Co-location is something DPD is very keen to explore. There are best practice have examples from our European business units where this has been successful. Co-location would allow for increased number of logistics operations without increasing the industrial footprint required.

DPD has been working with property partners to establish opportunities to either co-locate, work underground or from converted existing buildings and believe this to be a major area of opportunity. Effective underground operation has specific design requirements for the CEP and logistics operations that would have to be considered during the planning application. An obvious example being the clearance height of locations.

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Boroughs need to work with logistics companies through development plan creation to help the feasibility of these sites and support through the planning process. DPD would like to help the GLA, TfL and the boroughs in identifying suitable locations to aid development

planning. We believe there is a disconnect between the perception and actual requirements

of operators.

User: Trundley’s Road Limited

We will shortly be submitting a planning application for the Site for the demolition of existing buildings and construction of a basement, double height commercial plinth at ground floor and two buildings one of part 6 & 9 storeys and one of part 11 to 15 storeys to provide 2,200 sqm (GIA) of flexible commercial floorspace (Use Classes B1c/B2/B8) at ground and mezzanine floors, 189 residential dwellings above, with associated access and highway works, amenity areas, cycle, disabled and commercial car parking (within the basement) and refuse/recycling stores.

The Site falls within the wider Surrey Canal Strategic Industrial Location (SIL) identified and afforded strategic protection by the London Plan (2016) for industrial uses. When submitted, this application will follow 18 months of pre-application advice discussions with the London Borough of Lewisham (LBL) during which a masterplan for the Site and part of the wider Surrey Canal SIL has been collaboratively produced that would see this part of the SIL regenerated to provide commercial-led mixed use development. This approach is in line with the direction of travel set out in the evidence base for LBL’s emerging Local Plan which identifies this part of the SIL for re-designation to ‘Mixed-Employment Location (MEL) that would support a mix of commercial and residential uses to overcome the existing low density of industrial uses and poor quality of the buildings.

With particular regard to the Site, approximately 43% is occupied by non-SIL uses comprising Class ‘A’ uses with residential flats above. Further the existing buildings on the Site that are in commercial use are in a poor condition and are only partly occupied. As a result, the Site is not providing the maximum use of the SIL land and therefore has significant potential for regeneration and in particular, ‘intensification’ via the consolidation of the SIL uses on the Site to support the delivery of residential accommodation in accordance with draft policies E4 and E7 of the New London Plan.
It is acknowledged Policy E7 part B sets out that such development proposals:

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

However, it is considered that this policy requirement should be implemented with some flexibility in relation to development proposals such as those for the Trundley's Road site that are coming forward during this transitionary phase of planning policy, so as not to unnecessarily delay development. It is considered this should particularly be the case for development proposals such as those proposed for the Site that result in no net loss of industrial land in line with policies in the draft New London Plan and where it can be demonstrated the approach taken has been in collaboration with the borough over a significant period of time and that has resulted in proposals that are ultimately supported by the borough.

Further, in applying the general principle set out in draft policies E4 and E7 of 'no net loss of floorspace' across designated SIL sites, it is considered these policies should explicitly take into consideration the existence of non-SIL uses on some SIL sites and apply this more flexibly to allow for the protection such uses (mainly residential) are also afforded by planning policy.

We consider flexibility should particularly be applied for development proposals such as those for Trundley's Road that are coming forward during this transitionary policy phase, that have sought to comply with draft policies E4 and E7 and that further, take a long-term view to propose a 35% GLA compliant affordable offer, despite viability evidence to demonstrate this level is significantly above the maximum reasonable amount that can be provided.

In light of the above, we request that policies H5, H6, E4 and E7 are reviewed and amended in order to be consistent with policies that support growth in the Plan.

User: Aviva Investors

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

A core element of Policy E7 is the promotion of SIL intensification as a means of facilitating the industrial consolidation to support the delivery of residential and other uses.

Aviva Investors supports the intensification of business uses in classes B1c (Light Industry), B2 (General Industry) and B8 (Storage and Distribution) where such intensification is accompanied by the release of industrial land for housing development as part of a process of industrial land consolidation. Such a process has the opportunity, in the right circumstances, to maintain industrial capacity whilst also supporting the delivery of much needed housing.

There are examples within Aviva Investors' portfolios where designated industrial land accommodates a range of very successful business functions, which may also have the potential to be developed more intensively. Simultaneously, there are also examples of designated industrial sites which do not work so well for occupiers/ neighbouring uses, or both. The potential therefore to better manage industrial capacity by offsetting the loss of sub-optimal industrial capacity through the increased provision on other existing industrial land is supported by Aviva Investors.

Policy E7 states that intensification can be achieved through the development of mezzanines; introduction of small units; development of multi-storey schemes; addition of basements; more efficient use of land; and higher plot ratios. Whilst these forms of intensification can provide additional industrial floorspace in terms of quantum, in most circumstances they are at odds with the needs of modern industrial/logistics occupiers, who are often looking for single storey, medium/large sized units with generous service yard space which is not shared with other occupiers. Multi-storey development, which technically has the greatest scope to create additional floorspace of all the intensification methods listed, is particularly high risk, expensive and complex. As an innovative, and therefore uncommon form of industrial space, it will take both investors and occupiers time to invest in this kind of space. The occupation of this space will also be limited to businesses which do not require a private yard and facilities, which significantly reduces the range of potential occupiers and reduces the desirability of the space.

For the reasons set out above, any new development delivered using the intensification principles listed in Policy E7 are likely to be compromised in terms of value, and will also typically come at a higher cost and risk to the developer. It is important for the preparation and implementation of this policy, and other relevant policies which will be applied to development proposals alongside Policy E7, that the Mayor fully understands this context.

User: Dr Jessica Ferm

The new **policy (E7)** on intensification, co-location and substitution is good in its intent to make more efficient use of land and encourage more integration of industry and other uses, potentially making industry a more visible and recognised part of our lively city. However:

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

The driver for the policy appears to be the release of some land for residential use, rather than increasing the capacity of industrial accommodation and maintaining the function of existing industrial uses

The policy needs to differentiate between intensification (through mixed use including residential) and intensification of industrial uses (via multi-storey etc). Presumably the latter could be encouraged on SIL/LSIS (indeed on any industrial site), whereas mixed use intensification is presumably not to be encouraged everywhere and would require a plan-led approach? The co-location of industrial and residential won't work in all cases and could undermine the integrity of SIL, the plan needs to be clearer on this. *Part D of Policy E7* indicates that mixed use or residential development proposals on non-designated industrial sites will be supported where x, y and z. Firstly, we should be encouraging mixed use over residential, not suggesting that the two are interchangeable. We should also be more prescriptive about the type of uses to be accommodated in 'mixed use' and the priority for industrial uses currently on site to be accommodated on site. Secondly, the wording of this policy is VERY encouraging to developers and will result in much release of non-designated industrial sites.

There is no evidence of the viability and deliverability of the intensification policy. The Plan requires the development industry to bring forward proposals – what is the incentive? Might the diagrams and sections on p.251 show how industrial and residential could be accommodated together in vertical mixed use, as well as just side by side?

There is a lack of clarity around floor space/yard space in both Policy E4 and E7. The diagrams in E7 imply that yard space is redundant and an easy way to intensify. But we know from industrial developers and their occupiers that yard space is integral to operation. Therefore, where this is mentioned (e.g. Point C, Policy E4 and Point A, Policy E7), it should be made explicit that 'industrial floorspace capacity' includes operational yard space.

the policy of substitution should be a separate policy, with a clearly defined strategy requiring collaborative working. It is not similar to intensification or co-location and only serves to suggest that this is all part of a strategy to facilitate residential development. Perhaps local authorities outside London who are willing to accommodate more industrial uses should be encouraged to do so in order to provide additional industrial capacity (rather than facilitate substitution).

User:	Richard Bennett

Policy H1, B 2 f) refers to Policies E4, E6 & E7. These policies should be checked to ensure that they do not discriminate against Gypsies & Travellers and make future site provision more difficult.

User: Travis Perkins Plc

(A)
• We support the proposals, but would emphasise that one of the most significant policies for “supporting London’s economic function” will be to require local authorities to retain the use of builders’ merchants where there may be plans for intensification and development.
• We would also argue that there must be no overall space loss of the pre-existing industrial land. Square footage must be the same as before any intensification to sites. This will ensure there is no overall loss of industrial floor space in London.

(D)
• We agree that mixed-use or residential development should only take place on Non-Designated Industrial Sites where there is no reasonable prospect of the site being used for industrial and related purpose such as wholesale.
• We would again emphasise that whether on SIL or non-SIL designated land, what is most critical is that the pre-existing land use is maintained, including specific sui generis uses, when considering sites for mixed-use development.

(E)
• TP is encouraged by City Hall’s desire to deliver an increase (or at least no overall net loss) of capacity in terms of industrial, storage and warehousing floor space.
• It is important that City Hall employs tactics to enforce this if it is to ultimately achieve this objective. Given the trend of lost industrial land, City Hall will need to work closely with the London boroughs to ensure essential services and wholesalers do not see their floor space reduced when sites are intensified or see mixed-use development introduced.

User: Travis Perkins Plc

Wickes Building Supplies

• We are keen to draw the Mayor’s attention to disputes in planning decisions that do not support the Mayor’s desire to retain industrial land.
• For example, Wickes Building Supplies (WBS), one of TP’s businesses, supplies trade quality DIY and home improvement products to a predominately trade customer base.
• Despite this, WBS sites continue to be recognised as A1 despite a significant evidence base making the case for sites to be classified as a mixed-use (sui generis) recognising the split of trade and retail sales. WBS has been told by local authorities that it cannot obtain planning permission on the grounds that it will reduce the industrial use of a site.
• We would therefore urge the London Plan to include provisions to ensure that local authorities take full account of the evidence provided in planning applications with regards to use classes.
• The services provided by Wickes have routinely been classified as purely retail when they perform a range of services that more comfortably sit within a mixed-use categorisation.
• Surveys initially undertaken in 2011 of two branches of Wickes to identify the actual characteristics of customers showed that 54% of customers were trade customers and 46% were retail. In terms of branch turnover, 61% is trade based.
• Further Surveys were undertaken in 2017 which provides additional empirical of the actual characteristics of Wickes Building Supplies’ customers.
• The results showed that 50% of customers were trade customers and 50% were retail, and during the week this increased to 56% of customer trips by trade customers or for trade related purposes. And of the total spent at the two branches, nearly 60% was generated from trade sales, with 40% retail sales.
• Urging councils to take account of such evidence when assessing the alignment of planning applications to planning policy, will allow for boroughs to properly assess applications on their merits.
• This in turn will ensure that an appropriate mix of use classes to service the London economy is provided across the city, supporting the objectives set out in the draft Plan to support London’s continued growth.

User: Aggregate Industries UK Ltd

Draft Policy E7, Intensification, co-location and substitution of land for industry, logistics and services.

There is no objection in principle to Draft Policy E7 and the intensification of industrial land but there is concern with regard to this including mixed use or residential development in LSIS or on non-designated industrial sites, as provided by part (c) and (d) of this policy. Many sites such as this will abut designated SIL sites and indeed safeguarded wharves, and/or railhead locations and sites accommodating minerals plant. This policy approach can only be supported under the provisions of Part E of the draft policy which must be retained in full and would benefit from further clarification as follows:

E

The processes set out at Parts B, C and D above must ensure that:

1) the industrial uses….

2) the industrial and related activities on-site and in surrounding parts of the SIL, LSIS or Non-Designated Industrial Sites are not compromised in terms of their continued efficient function, access, service arrangements and days/hours of operation noting that many businesses have 7 day/24 hour access and operational requirements. In line with Policy E5, Strategic Industrial Locations, Part E, and with Agent of Change principles, Policy D12 and having regard to Policies SI10, Aggregates and SI15 Water Transport.

Supporting text to the policy should also be clear that wharves, railheads and mineral plant are not appropriate for consideration for substitution outside of London. These sites and infrastructure are critically required within London to sustainably service the construction industry and as expressed by a range of other policies in the Plan, and the NPPF, are to be expressly safeguarded for those purposes. In the event that these are unavoidably threatened relocation within the vicinity should be the only option considered. For avoidance of doubt supporting para 6.7.5 should be amended as follows

There is a significant amount of industrial and logistics capacity serving London that is located outside of the capital. There may be scope for some substitution of London's industrial capacity to locations in the wider region where this results in mutual advantage, such as complementary business opportunities and transport infrastructure improvements. This will require close collaboration between planning authorities inside and outside London and must ensure that any substitution does not give rise to cumulative negative impacts including, for example, on business supply chains, labour markets, pollution and congestion. Safeguarded wharves, railheads and mineral plant are not considered appropriate for substitution outside of the capital, due to the established locational factors that define why these sites are safeguarded/protected in London and in line with the specific safeguarding requirements of Policy SI10, Aggregates and SI15, Water Transport.

User: Ashia Centur Limited

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

Part (A) of draft Policy E7 promotes the intensification of business uses in Use Classes B1c, B2 and B8 occupying all industrial land, through the development of mezzanines, small units, multi storey schemes, basements and crucially more '*efficient use of land through higher plot ratios having regard to operational requirements (including servicing) and mitigating impacts on the transport network where necessary*'.

Our client is broadly supportive of the principles set out within part (A), particularly regarding promoting higher plot ratios as efficient use of land within the built up areas of London and principle of co-location of residential uses. However, further consideration should be given to the policy to make provision for the more innovative and emerging light industrial, logistics and warehouse and storage uses which utilise the growing trend of quiet technology innovation to improve compatibility with more sensitive co-located uses (e.g. Class C3 residential uses and sui-generis live work units). In particular, the policy should give consideration to the use of quiet delivery management strategies, quiet loading and docking bays and quiet technologies in loading lifts, trucks and machinery have all enabled businesses to reduce their impacts on neighbouring uses. Such innovations are expected to only continue to grow.

Part (B) of the draft policy deals with the process of intensification and consolidation states:

'Development Plans and planning frameworks should be proactive and consider, in collaboration with the Mayor, whether certain logistics, industrial and related functions in selected parts of SILs could be intensified. Intensification should facilitate the consolidation of the identified SIL to support the delivery of residential and other uses, such as social infrastructure, or to contribute to town centre renewal. This process must meet the criteria set out in part E below and ensure that it does not undermine or compromise the integrity or effectiveness of the SIL in accommodating the industrial-type activities identified in part C of Policy E5 Strategic Industrial Locations (SIL). This approach should only be considered as part of a plan-led process of SIL intensification and consolidation (and the areas affected clearly defined in Development Plan policies maps) or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough, and not through ad hoc planning applications'.

We suggest that the wording of the last sentence should be revised to introduce to greater flexibility as follows:

‘*This approach should only be considered as part of a plan-led process of SIL intensification* ***and/or*** *consolidation (and the areas affected clearly defined in Development Plan policies maps) or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough, and not through ad hoc planning applications’.*

Our client supports the policy E7 part (B)’s aim of encouraging pro-active development plans and planning frameworks in relation to SIL intensification, which facilitates the consolidation of SIL land to support the delivery of residential development and other uses. In our view ‘other uses’ should be defined in greater detail and include for example a range of additional commercial (e.g. Class B1, A1, A2 and A3) and social (Class D1) uses.

Furthermore, our client welcomes the principle of promoting a masterplanned approach in collaboration with the Mayor and relevant Borough in relation to the intensification and consolidation.

Part (E) of the draft policy sets out specific criteria, for SIL intensification which facilitates consolidation and states:

‘The processes set out in Parts B, and D above must ensure that:

1) the industrial uses within the SIL or LSIS are intensified to deliver an increase (or at least no overall net loss) of capacity in terms of industrial, storage and warehousing floorspace with appropriate provision of yard space for servicing

2) the industrial and related activities on-site and in surrounding parts of the SIL, LSIS or Non-Designated Industrial Site are not compromised in terms of their continued efficient function, access, businesses have 7-day/24-hour access and operational requirements

3) the intensified industrial, storage and distribution uses are completed and operational in advance of any residential component being occupied

4) appropriate design mitigation is provided in any residential element to ensure compliance with 1 and 2 above with particular consideration given to:

a) safety and security (see Policy D10 Safety, security and resilience to emergency and Policy D11 Fire safety)

b) the layout, orientation, access, servicing and delivery arrangements of the uses in order to minimise conflict (see Policy T4 Assessing and mitigating transport impacts)

c) design quality, public realm, visual impact and amenity for residents (see Policy D1 London's form and characteristics, Policy D2 Delivering good design, Policy D3 Inclusive design, Policy D4 Housing quality and standards, Policy D5 Accessible housing, Policy D6 Optimising housing density, Policy D7 Public realm and Policy D8 Tall Buildings)

d) vibration and noise (see Policy D13 Noise)

e) air quality, including dust, odour and emissions (see Policy SI1 Improving air quality and Policy SI2 Minimising greenhouse gas emissions).'

With regards to the criteria set out above our client has concern regarding the limiting nature of part 3) as the residential element of a proposal could act as the enabling element to facilitate and fund SIL intensification and consolidation. The client urges the Mayor to omit this wording.

The supportive text (paragraphs 6.7.1-6) provides further detail for the application of draft Policy E7. Our client broadly support's the assertion made in paragraph 6.7.1:

'In collaboration with the Mayor, boroughs are encouraged to explore the potential to ***intensify industrial activities*** *on industrial land and consider whether some types of industrial activities (particularly light industrial) could be co-located or mixed with residential.'*

The client is supportive of the principle of transferring some SIL land for a mix of uses including residential (set out under paragraph 6.7.2), but requests that the reference to Policy H4 is removed as it does not relate to affordable housing thresholds discussed in the text.

Furthermore, in our view further consideration should be given to the changing nature and demand characteristics of within the industrial, logistics and warehouse sectors in terms of land. Many of such uses have moved away from the 'heavy' and 'dirty' characteristics typically associated with the sectors, with businesses now focusing on lighter, flexible industrial uses. These uses utilise employment land more efficiently and reduce amenity impacts in terms of noise, air quality and dust pollution and thus, more conducive to co-location of other uses.

Our client also strongly supports paragraph 6.7.5 which states that:

‘*There may be scope for some substitution of London’s industrial capacity to locations in the wider region where this results in mutual advantage, such as complementary business opportunities and transport infrastructure improvements. This will require close collaboration between planning authorities inside and outside London and must ensure that any substitution does not give rise to cumulative negative impacts including for example, on business supply chains, labour markets, pollution and congestion*.’

User: Ashia Centur Limited

Draft Policy E7

? Provision should be made for innovative and emerging light industrial, logistics warehouse uses which implement quiet technologies and better reflect recent best practice development examples referenced in the Mayor's Industrial Intensification Primer and the more recent innovative best practice examples such as the redevelopment of the Former Nestle Factory in Hayes.

? In relation to part (B) 'other uses' should be defined in greater detail and include additional commercial (e.g. Class B1, A1, A2 and A3) and social (Class D1) uses.

? With regards to the criteria set out above our client has concern regarding the limiting nature of part 3) as the residential element of a proposal could act as the enabling element to facilitate SIL intensification and consolidation. The client urges the Mayor to omit this wording.

? The client is supportive of the principle of transferring some SIL land for a mix of uses including residential (set out under paragraph 6.7.2), but requests that the reference to Policy H4 is removed as it does not relate to affordable housing thresholds discussed in the text.

User:	Mr Gary Hayes

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

We have some concerns that mixing of industrial activities and residential will drive out what are deemed to be ‘dirty businesses’ and about the potential of increase property values, making it more difficult for some businesses to be able to afford to stay.

User: Redrow Homes London Division.

We support the suggestion that Development Plans and planning frameworks are proactively used to identify LSIS that could be intensified and co-located with residential and other uses. However, we consider that the second half of Part C should be deleted to allow for greater flexibility.

With respect to Part F, in view of London's 'housing crisis' we consider that this policy should be revised to support planning applications for intensified and co-located floorspace with residential and other uses coming forward where these are supported by a comprehensive masterplan and where they benefit from support by the Borough and the GLA's planning decisions unit.

Delete and amend policy in line with comments.

User: Cemex UK Ltd

Draft Policy E7, Intensification, co-location and substitution of land for industry, logistics and services.

There is no objection in principle to Draft Policy E7 and the intensification of industrial land but there is concern with regard to this including mixed use or residential development in LSIS or on non-designated industrial sites, as provided by part (c) and (d) of this policy. Many sites such as this will abut designated SIL sites and indeed safeguarded wharves, and/or railhead locations and sites accommodating minerals plant. This policy approach can only be supported under the provisions of Part E of the draft policy which must be retained in full and would benefit from further clarification as follows:

E The processes set out at Parts B, C and D above must ensure that:

1) the industrial uses….

2) the industrial and related activities on-site and in surrounding parts of the SIL, LSIS or Non-Designated Industrial Sites are not compromised in terms of their continued efficient function, access, service arrangements and days/hours of operation noting that many businesses have 7 day/24 hour access and operational requirements. In line with Policy E5, Strategic Industrial Locations, Part E, and with Agent of Change principles, Policy D12 and having regard to Policies SI10, Aggregates and SI15 Water Transport.

Supporting text to the policy should also be clear that wharves, railheads and mineral plant are not appropriate for consideration for substitution outside of London. These sites and infrastructure are critically required within London to sustainably service the construction industry and as expressed by a range of other policies in the Plan, and the NPPF, are to be expressly safeguarded for those purposes. In the event that these are unavoidably threatened relocation within the vicinity should be the only option considered. For avoidance of doubt supporting para 6.7.5 should be amended as follows

There is a significant amount of industrial and logistics capacity serving London that is located outside of the capital. There may be scope for some substitution of London's industrial capacity to locations in the wider region where this results in mutual advantage, such as complementary business opportunities and transport infrastructure improvements. This will require close collaboration between planning authorities inside and outside London and must ensure that any substitution does not give rise to cumulative negative impacts including, for example, on business supply chains, labour markets, pollution and congestion. Safeguarded wharves, railheads and mineral plant are not considered appropriate for substitution outside of the capital, due to the established locational factors that define why these sites are safeguarded/protected in London and in line with the specific safeguarding requirements of Policy SI10, Aggregates and SI15, Water Transport.

User: Sainsburys Supermarkets Ltd

Policies E4 and E7

We offer outline support for the protection of existing industrial locations. Having regard to Policy E7 D, we do not object to the introducing of mixed-use or residential uses on non-designated industrial sites. However, in accordance with the Agent of Change principle, there must be specific reference to the fact that introducing these uses must not fetter the operation of industrial and distribution sites. Proposed schemes must therefore be designed to allow for the continued 24-hour operation of distribution and industrial sites

User: DB Cargo UK Ltd

DB Cargo supports the fact that the policy seeks to ensure that the industrial and related activities on-site and in surrounding parts of the SIL, LSIS or Non-Designated Industrial Site are not compromised in terms of their continued efficient function, access, service arrangements, and days/hours of operation.

However, DB Cargo consider that the policy does not go far enough in protecting rail freight facilities; these should be mentioned specifically to ensure that residential/mixed use development in these areas does not undermine the viability of facilities and necessary co-located activities. The policy should have clearer guidance on the value of rail fright facilities and how to manage potentially sensitive uses in the proximity of rail freight facilities (e.g. the need to avoid onerous planning conditions which undermine the viability of facilities).

The policy gives a lot of discretion to Boroughs to decide how/where currently protect industrial land will be released for residential development. The London Plan give therefore give a clearer steer about the strategic importance of rail freight facilities and the need to protect them.

The policy should also highlight the benefits of co-location of processing, storage and recycling to achieve more efficient vertical integration of processes.

User: Rockwell Property Limited

Our client supports the Mayor's recognition of the ability of industrial uses to be 'co-located' or mixed with residential through intensification and considers Policy E7 to be a worthy attempt to marry key objectives of the Plan to protect existing industrial floorspace and promote the delivery of new homes. However, the wording within this draft policy and supporting text is considered to be unclear and ambiguous, which in turn will reduce the success of this initiative.

Policy E7 states that intensification of SIL and LSIS should only be considered on sites that have been specifically identified through a plan-led process or as part of a coordinated masterplanning process. As stated earlier in this representation, the term 'release' has been used in Policy E4 and E5 to describe where certain industrial lands might be identified through a plan-led approach for intensification of existing industrial uses and co-location with other uses such as residential. However, the term 'release' is not used in the main text of Policy E7 with the use of alternative terms such as 'intensify', 'co-locate' and 'consolidate'.

Paragraph 6.7.2 of the justification text for Policy E7 further adds to the confusion in terminology when it states that a plan-led approach should be used to "deliver an intensification of industrial and related uses in the consolidated SIL or LSIS and facilitate the **transfer of some land** for a mix of uses including residential." In advising local authorities on how to implement this approach through their Development Plan the same paragraph then suggests that the Local Plan Policies' map should

indicate clearly:
(i) The area to be retained and intensified as SIL and LSIS; and
(ii) The area to be removed from SIL or LSIS (as shown in the illustrated examples in Figure 6.3)

The illustrative examples in Figure 6.3 then show land being consolidated through multi-storey industrial development on a ‘retained’ portion of SIL/LSIS with the remaining portion of SIL/LSIS being ‘released’.

In the first instance, it is requested that the Mayor review the terminology used within Policies E4 to E7 so that a clear distinction can be made between the ‘Limited Release’ of SIL/LSIS identified to take place in Newham, Havering and Barking and Dagenham and the consolidation / intensification / co-location approach promoted more generally across all of London for some SIL/LSIS sites through a plan-led approach.

Secondly, it would be extremely difficult and indeed premature in most cases for the Local Plan policies’ map and/or OAPFs to clearly indicate which portion of a SIL/LSIS site should be retained and which should be released, as currently required by Policy E7. To successfully implement such a requirement would require detailed masterplanning work to be undertaken to establish the most appropriate layout and distribution of uses across the site. This level of analysis would often not be available in advance of Plan preparation.

It would instead be simpler and more effective to retain the SIL/LSIS designation within an overall site allocation boundary until such time as a scheme has come forward that successfully implements the intensification and consolidation approach to the Council/GLA’s satisfaction. Any approved or implemented development could then be reflected in an updated Policies Map at a later stage. It is therefore recommended that paragraphs 6.7.2 of the justification text for Policy E7 and Section C-C of Figure 6.3 are amended to reflect this approach.

User:	Andrea Carey Fuller

We have some concerns that mixing of industrial activities and residential will drive out what are deemed to be ‘dirty businesses’ and about the potential of increase property values, making it more difficult for some businesses to be able to afford to stay.

User: UKWA

UKWA supports the overarching aim of this policy to encourage more effective and efficient use of land. We are concerned that these practices are as yet unproven in London and believe from both the developer and occupier's perspectives are unlikely to be achievable on many sites in London. There this policy will not deliver the volume or capacity that is envisaged by it. Intensification is only going to work in areas of high demand and cost of delivering the scheme can be sufficiently meet by the rents that would be needed.

UKWA would also like to stress that intensification and co-location should be industry led and the right business case is made for this. New logistic and warehousing space to be given priority over the residential needs (UKWA has concerns where cross docking facilities are needed that they would not be compatible with residential demands).

The policy should also recognise the need for open yard and storage space

User: UKWA

We support this measure.

It should be recognised that mulita-storey developments maybe not deliver or be viable on all SIL sites and boroughs should be given more freedom to manage overall supply as long as there is no net loss and the sites are in the right commercial location.

User:	UKWA

UKWA seeks clarification of the terms intensification and co-located does this mean mixed use developments or more intensive use for industrial and logistic use? Is the intensification intended to provide the capacity for introducing residential uses through co-location? Does co-location mean separation of logistics to residential uses or does it mean residential uses above logistics? There must be clear definitions to avoid any confusion during the life time of the plan.

User:	UKWA
This process must be rigorous and fully evidence based.	

User:	UKWA
This process must be rigorous and fully evidence based.	

User:	UKWA

The promotion of substitution of locating industrial and warehousing outside of London is very concerning to UKWA and could lead to more unsustainable travel patterns in London, with increased and longer journeys and the associated air quality implications. It would also lead to loss of employment in the capital and the economic benefits they bring to local boroughs.

User:	Oneill Homer

E7 This will be a challenge for Boroughs to implement quickly and effectively. Identifying the potential to intensify industrial land and to collocate will be site specific. Setting appropriate development principles to manage their mix and scale of uses requires detailed local knowledge and a deep understanding of the business and land use relationships between the land and its surrounding area. Neighbourhood plans that have strong local business representation are well placed to assist Boroughs in this process or to take on this responsibility.

User: L&Q

Mixed LSIS and intensification masterplans

We support the suggestion that Development Plans and planning frameworks are proactively used to identify LSIS that could be intensified and co-located with residential and other uses. However, we consider that the second half of Part C should be deleted to allow for greater flexibility. With respect to Part F, in view of London's 'housing crisis' we consider that this policy should be revised to support planning applications for intensified and co-located floorspace with residential and other uses coming forward where these are supported by a comprehensive masterplan and where they benefit from support by the Borough and the GLA's planning decisions unit.

Delete and amend policy in line with comments.

User: L&Q

Measuring no net loss of industrial, storage and warehousing capacity

Part E of Policy E7 seeks that where other uses (including residential) are introduced into industrial sites then there should be ‘an increase (or at least no overall net loss) of capacity in terms of industrial, storage and warehousing floorspace’. Paragraph 6.4.5 states that ‘floorspace capacity is defined here as either the existing industrial and warehousing floorspace on site or the potential industrial and warehousing floorspace that could be accommodated on site at a 65 per cent plot ratio (whichever is the greater)’. We are aware that others making representations to the London Plan will provide numerical evidence on this point but all are in agreement that a 65 per cent will almost always if not always exceed the actual plot ratio of any given site. The effect of the approach outlined above is that this policy approach will nearly always (if not always) involve an uplift in the provision of Class B2 or Class B8 floorspace, at the same time as the site is to be developed to accommodate other uses. Beyond the above, there will be circumstances where land used for Class B2 or B8 purposes may be more appropriately put to alternative uses, including Class B1. An example would be a site surrounded by residential or other nonemployment uses where B2 or B8 uses are bad neighbours. As Class B1 uses for instance employ people at far higher densities, it is likely that the Plan’s objectives would be better served in that instance by a reduction in Class B floorspace and an increase in other types of floorspace (e.g. residential).

References to plot ratio must be removed. For the reasons set out alongside, the policy should acknowledge that in some instances changes to alternative uses may be more appropriate and will enable other Plan objectives to be advanced (e.g. the delivery of new homes).

User:	Pinkham Way Alliance

NB Waste Policy S18 is inconsistent with Policies E6, SK1, E4, and E7 insofar as it refers to Locally Significant Employment Sites/Land. This is the only reference to LSES/L and it is not referred to in the narrative. It should be amended to Locally Significant Industrial Sites which would be consistent with the explanatory narrative throughout the rest of policies and narrative in the Plan and it would remove the confusion about whether designated ‘Employment sites’ were suitable for waste uses

User: Taylor Wimpey UK

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

This policy is overly rest rictive and should be amended to set out criteria for dealing with planning applications. Where the development plan policies are out of date or are simply not achieving their objectives, opportunities for bringing forward the redevelopment of such sites should not be prohibited as currently set out in the policy. The policy should be revised to reflect Para 22 of NPPF.

User: Workspace Group

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

Workspace is supportive of this policy in principle but the requirements are so onerous as to make it doubtful that intensification and co-location will deliver much by way of new types of business floorspace and other uses, including much needed housing. Particular constraints will be the 50% affordable housing threshold for applicants using the "fast-track" route (not viability tested), the suggested typology of multi-storey industrial floorspace (expensive to deliver) and the need to provide and occupy replacement SIL type floorspace before any other land uses are occupied. The latter has major implications for development cash flow. Policy E7 should be amended as follows:

- The affordable housing threshold level should be 35% for the Fast Track Route for Strategic Industrial Locations, Locally Significant Industrial Sites and other industrial sites deemed appropriate to release for other uses.
- phasing requirements should be more flexible with scope to bring forward other uses (e.g. housing and SME style business space) alongside new industrial employment floorspace.

User: Aitch Group

Intensification of Existing Employment Land

Borough's should be allowed to define the nature or form of intensification as appropriate to their local areas and economic profile. In doing so, boroughs are allowed to proactively manage growth in its OA's due to the 'no net loss' principle attributed to industrial floor space in the draft London Plan.

Bexley's industrial land is currently dispersed across the Borough, resulting in fragmented pockets of industrial land-use. The Growth Strategy, where appropriate, seeks to reconfigure employment sites to create better-integrated, higher density and higher value locations, in the context of proposed connectivity improvements.

Bexley's substantial areas of employment land, away from growth hubs, are ripe for intensification. By concentrating development in these areas, significant regeneration benefits can be secured, and economic development opportunities realised. In doing so, the borough would see a logical redistribution of land uses, resulting in new sustainable neighbourhoods, rather than urban sprawl.

This would seek to echo the draft London Plans aspiration for no net loss of industrial floorspace, however this would be in overall terms across the borough. Through the intensification of remaining employment areas, there could be an increase in site coverage and plot ratios, development of mezzanines and creation of shared facilities.

User:	Berkshire Strategic Planning Group

The intention of Policy E7/F that LPAs' development plans should look at the potential to relocate industrial capacity to neighbouring authorities is noted. While the thrust of the policy is acceptable there is little evidence of the availability of receptor sites to take the displaced industrial capacity. Certainly in Berkshire, and probably across much of the Home Counties there is very little land available or suitable for such uses. Therefore while the principle of the policy is acceptable there is concern as to whether it will in fact be implementable.

User: London and Continental Railways

Draft Policy E7 adds further detail to E4, setting out that mixed-use or residential development proposals on Non-Designated Industrial Sites will be supported where:

1 There is no reasonable prospect of the site being used for the industrial/related purposes (set out in part A of Policy E4); or

2 It has been allocated in a Development Plan for residential/mixed-use development on the basis of number 1; or

3 Industrial, storage or distribution floorspace is provided as part of a mixed-use intensification where this is feasible; or

4 Suitable alternative accommodation (in terms of type, specification, use and size) is available in reasonable proximity to the development proposal and subject to relocation to support arrangements for existing businesses before commencement of new development.

Clearly part 2 above sets a positive position for the development of non-designated industrial sites for residential/mixed-use schemes. It is not, however, considered that these sites would only be allocated based on point 1, i.e. there is no reasonable prospect of the site being used for the industrial/related purposes. Local authorities will need to review their land and seek to identify allocations based on their suitability for different uses including housing, retail and/or employment (whether office and/or industrial) to meet their identified needs. Sites within OAs and identified within local SPGs as areas of change/for future development, should also be identified as potential sites for creating residential neighbourhoods. In short, the current draft policy does not allow boroughs, site owners and prospective developers to fully reflect local needs and circumstances, and contradicts with other policies of the draft London Plan and Mayoral planning guidance, such as draft Policies SD1 (*Opportunity Areas*), D1 (*London's form and Characteristics*) and D6 (*Optimising Housing Density*), and the Mayor's Olympic Legacy SPG.

We consider that part 2 of the policy should be amended as follows: "*It has been allocated in a Development Plan for residential/mixed-use development*". This would reflect the range of circumstances, based on local evidence at a borough level, that justify the allocation of sites.

User: Prologis

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

Prologis strongly supports the provisions of this policy and the processes of intensification, co-location and substitution. In particular the process of substitution has the potential to deliver more sustainable patterns of development by encouraging industry and logistics to be provided in the right strategic locations to best meet London's needs. Despite the name SIL designations are often not strategic locations but a consequence of historic designations that simply reflect where industry historically emerged, rather than where it is best located. These locations are often not well connected to the strategic road network1. Prologis welcomes the support that substitution provides for a joined up approach to ensuring that industry is located optimally to meet London's needs and reduce the impact of HGV movements on the road network and London's air quality, including where appropriate relocating industry beyond London to adjacent areas. We suggest the following modification to positively support this policies effectiveness:

F. Development Plans and planning frameworks should consider, within their boundaries or in collaboration with neighbouring authorities within and outside London, the scope to facilitate the substitution of some of London's industrial capacity to locations better connected to the strategic road or rail network, including related property markets elsewhere in London and beyond London's boundary where:

1)this results in mutual advantage to collaboration partners inside and outside London and supports a more efficient use of land

2)full regard is given to both the positive and negative impacts of substitution including impacts on servicing the economy inside and outside London, businesses and customers, labour markets and commuting, supply-chains and logistics, congestion, pollution and vehicle miles

3)a clearly-defined strategy for the substitution of future demand capacity and/or relocation arrangements where relevant, is in place to support this process.

User:	BA Pension Trustees, Nationwide Pension Fund Trustee & National Grid UK Pension

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

(modify Part E 3)

~~3) the intensified industrial, storage and distribution uses are completed and operational in advance of any residential component being occupied~~

3 Phasing plans should be secured that ensure that a substantial component intensified industrial, storage and distribution uses are completed and operational in advance of any residential component being occupied

User: London + Regional Properties

Draft Policy E7 Intensification, Co-location and Substitution of Land for Industry, Logistics and Services to Support London's Economic Function

Draft Policy E7 supports the intensification of business uses on industrial land. L+R support this policy, as this will enable the future development proposals at Albert Island to deliver increased employment floorspace and job provision at the site.

Part C of Draft Policy E7 requires planning frameworks to be *'proactive and consider whether certain logistics, industrial and related functions in selected parts of LSIS could be intensified and/or co-located with residential and other uses, such as social infrastructure, or to contribute to town centre renewal'.*

L+R strongly support the principle of primarily employment-led development within LSIS being co-located with housing and other facilities. This will enable Albert Island to create a sense of place, help integrate the scheme into neighbouring developments, as well as generating a significant increase in jobs and additional river-related activity. Co-locating complementary uses are considered by L+R to be necessary to encourage future businesses to be attracted to Albert Island as it will ensure that employees have easy access to local day-to-day facilities, without having to travel significant distances. Another key aspect of co-locating residential uses with industrial is that it would help create a new Albert Island community; functioning day and night, during the week and weekend.

User:	Airport Industrial Property Unit Trust

We note that Policy E7 (in Chapter 6) refers to the scope to facilitate the substitution of some of London's industrial capacity to related property markets elsewhere In London and beyond, as this could hypothetically free up the land for other uses and help to prevent loss of supply. Whilst we see the logic behind this and acknowledge that the policy only advocates any substitution as part of a clearly-defined strategy, it should be noted that some industrial uses could not be substituted to other locations. For instance, the nature of aviation related industrial and logistics uses is that they need to be close to airports, such as Heathrow.

User:	London Borough of Camden

The objectives of this policy are supported. We appreciate that it important for the Plan to seek to guarantee the provision of the employment use. However, the requirement for replacement industrial, storage and distribution uses to be operational in advance of any residential component being occupied may harm the delivery of large sites which are likely to be delivered in phases due to site/delivery constraints and we therefore suggest the wording should be amended to avoid this unintended outcome.

User:	Age UK London - a charity working with older Londoners

POLICY E7: DEVELOPMENT OF INDUSTRIAL SITES

PROPOSED POLICY AMENDMENT:

ADD NEW D(5): SOCIAL INFRASTRUCTURE IS PROVIDED AS AN INTEGRATED ELEMENT OF THE DEVELOPMENT PROPOSAL.

User:	Age UK London - a charity working with older Londoners

49. E7 LINK TO POLICY CHANGE Adding a new D5 will provide consistency with the rest of the London Plan which places substantial emphasis on social infrastructure, states social cohesion to be one of its aims in GG1 and seeks to reduce travel to essential services. T1, T2 For the sake of absolute clarity, housing without social infrastructure cannot create a community.

User: Regeneration X

SD5: The policy of Local Authorities to plan for the intensification of industrial land assumes a high level of competence from the Local Authorities in order to do this successfully. This is a doubtful supposition.

There is also talk of ensuring Planning Frameworks are subject to public consultation. This is not strong enough; there must be engagement with communities (under the Gunning Principles of Public Consultation) before any planning work is undertaken and not consultation after a lot of work has already been undertaken. Too often communities are being presented with, what seems to them, a set of proposals over which they have no real say or influence.

User: Pat Turnbull

Policy E5 Strategic Industrial Locations (SIL)

Policy E6 Locally Significant Industrial Sites

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

These policies need a rethink. There is a danger that the process of intensification as suggested in these three policies will drive even more industry out of the capital. Industrial estates and other workplaces often consist of low rise buildings rented relatively cheaply. If a plan-led process leads to these buildings being demolished and replaced by higher rise new buildings, some industries will not be able to use them, and others may be driven out by increased cost.

So this drive to cram more in may destroy even more workplaces. There seems here to be a dogmatic view of what is desirable in London which may contradict reality and create a London which does not provide jobs or meet Londoners' needs. It may look prettier, but is that the prime consideration when it comes to economic activity?

Certain types of mixed use development are likely to militate against certain types of industrial production e.g. developers of housing for market sale will not want economic activity nearby which will lower the price of the housing.

User: Balfour Beatty

Policy E7 - Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function
Balfour Beatty supports the introduction of more detailed policies that allow for the co-location of residential uses on SIL/LSIS through the intensification of existing uses. London Boroughs are already embracing this step change in policy as the recent approval of Barratt and Segro’s scheme in Hillingdon shows. This provides 21,000 sqm of industrial space and 1,300 new homes at the former Nestle site in Hayes, and shows that such proposals are capable of being acceptable. However, the Draft New London Plan should acknowledge that this policy approach may not be suitable or deliverable for all sites. Further research should be undertaken by the GLA to determine the types of location or conditions where it may be achievable. With this in mind the intensification, co-location and substitution should be allowed to take place through planning decisions, as well as the plan-led process to allow a flexible approach to delivery of these objectives.

User: London Borough of Bexley

As a document, the draft Plan suffers from sections where the narrative breaks down. The wording of some policies is particularly obscure, with even experienced planners and other technically qualified officers finding it difficult to follow. One example of this is **Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function**. The policy is three pages long, with proposed measures in **Part E** addressing all processes set out in **Parts B, C** and **D** and it is not clear which measure relates to which process. In addition, a number of sections introduce, within the supporting text, an approach or requirement that does not appear to be supported by the language within the policy itself, or appears to be an additional requirement to those set out in the policy proper. For example, **Paragraph 5.3.6** considers the need for special educational needs and disability provision, but this need is not referred to within **Policy S3 Education and childcare facilities**. The supporting text in **Paragraphs 11.1.8** to **11.1.67** considers funding and other delivery issues, whereas policy **DF11 Delivery of the Plan and Planning Obligations** itself focuses on securing planning obligations.

User:	Essex County Council

Whilst the justification for such a policy is clear, it is considered that the intensification of industrial land in this manner will impact on different industry types in a markedly different manner, including to the extent that some industrial practices may be untenable in certain mixed use environments. The final form of this policy will have to ensure that there is a sufficient quantity of industrial land in the respective London Borough(s) to accommodate ‘bad neighbour’ industries following intensification/co-location/substitution, where the current and forecasted need for such facilities has been established. As a sui-generis use considered acceptable on B2/B8 land, the waste industry may be negatively impacted by such proposals compared to other types of uses found on such estates. Estate reconfiguration may also preclude the establishment of certain types of industry not currently operating within a particular estate which could’ve otherwise been considered at the location in the future. Such reconfiguration then acts to reduce the range of uses such an estate may otherwise have been able to incorporate.

Policy E8 Sector growth opportunities and clusters

User:	Sean Creighton

In its assessment of the Croydon Growth Plan in 2014 and in its submission on the Croydon Local Plan (Partial Revision) CTUC argued for the development of a diverse economy, not largely dependent on office, retail and leisure, including green and IT jobs.

User:	Andrea Carey Fuller

We are concerned that much of this policy is aimed at ‘people like us’ (i.e. those developing the policy) rather than seriously considering how policy may address the issues highlighted in the text of E11 – particularly for exiting lower income households that are unemployed or are in in-work poverty and young people.

User: London Stansted Cambridge Consortium

The new Draft Plan provides the planning framework to deliver workspace for business and employment. This is intended to complement the Mayor's Economic Development Strategy (EDS) which identifies sector opportunities and clusters.

Several sectors are identified which mirror the key growth sectors in LSCC Agenda for Jobs, Growth and Improved Liveability report published in 2014. This includes Life Science and Medical; IT; Digital and Media; Low Carbon, Clean Tech and Energy from Waste; and Financial and Business Services. The LSCC fully supports attempts to grow these sectors as it will help with our aspiration to become one of the primary 'knowledge regions' in the world.

LSCC partners aspire to deliver business and employment growth in these key sectors. There is a concern that central London will deliver high quality jobs whilst low quality jobs will be pushed to outer London and the corridor (particularly given the constraints of SIL land). LSCC is keen to work with GLA partners to ensure the benefits of key sectors are realised in all areas of the Innovation Corridor.

The LSCC Agenda for Jobs, Growth and Improved Liveability also identified food production and engineering, transport, logistics and distribution as priority sectors for the corridor. Whilst these are not classified as priority sectors, the importance of these activities in supporting and enabling priority sectors (i.e. through supply chains and innovation) should not be overlooked.

User: dp9

Policy E8 – Sector growth opportunities and clusters

We support policy E8, in particular its requirement to maximise London’s global leadership in tech across all sectors, and the recognition in part C of the policy of the various different types of office accommodation that London requires.

User:	London Borough of Camden
This policy is supported and reference to the MedCity cluster is welcomed.	

User:	Battersea Project Land Company Limited

Policy E8 – Sector growth opportunities and clusters
We support policy E8, in particular its requirement to maximise London's global leadership in tech across all sectors, and the recognition in part C of the policy of the various different types of office accommodation that London requires.

User: Barts Health NHS Trust

Draft Policy E8 – Sector Growth Opportunities and Clusters

The Trust supports the general aims of the policy and in particular the recognition that Whitechapel is an appropriate location for life sciences development.

However, the Trust objects to the description of 'life sciences' as set out on page 254. In particular the Trust objects to the description of facilities being provided "…*around Whitechapel, associated with Queen Mary University of London*…".

Opportunities for life sciences development also exist because of the world-leading research work undertaken at the Royal London Hospital. Life sciences development on the Trust's landholdings is in no way dependent on an association with Queen Mary University of London ('QMUL'), albeit the Trust continues to work with QMUL in this regard.

To achieve its ambitions for life sciences, it is possible that the Trust will seek additional partners / organisations to locate at Whitechapel. In this respect, defining life sciences as being associated with QMUL could be unhelpful and possibly unachievable

We suggest the following alternative wording: "…*around Whitechapel, near to the existing Royal London Hospital and Queen Mary University of London medical and life sciences facilities…".*

Similarly, we request that the description of 'MedCity' be amended to explicitly recognise the health sector's role in this concept.
In short it is the Trust's view that planning policy should not dictate the types of users that might occupy space because it can create uncertainty in relation to land uses and may be a disincentive for investors to support schemes. Furthermore, the failure to secure particular users or occupiers could render policy obsolete and policy ought to incorporate a reasonable degree of flexibility to avoid such situations.

User: Pat Turnbull

Policy E8 Sector growth opportunities and clusters

This policy needs a rethink. The non working class jobs referred to in this policy seem to be preferred by the writers of this plan. There have also been cases where higher education institutions were used as a tool to try to drive out working class homes and jobs eg Carpenters Estate in Newham. The Fashion Hub in Hackney has turned out to be, not a thriving hub of creatives, but a collection of expensive stores. Space provided for start-ups in Here East on the Olympic site costs £250 a month for a desk. Only people who can fund themselves without a steady job can afford to use this kind of space.

User:	United Colleges Group (UCG)

Specifically, we support draft Policy E8 which highlights the role of education institutions, and the importance of continued learning and development. The Plan recognises the importance of further education, in bringing together the community and providing continued training and development for London’s population. UCG also express support for the principles of the ‘Good Growth’ agenda.

Policy E9 Retail, markets and hot food takeaways

User: McDonald's Restaurants Ltd

School proximity policy

Suggested Alternative policy wording

" C. Development proposals containing A1 uses selling food, A3 uses that could deliver food or A5 uses, will not be permitted where it is shown that they would materially contribute to an adverse impact on health.
Boroughs should draft criteria based policies that allow an assessment to be made of the health impacts of such development, which may include consideration of the following:
(a) The range of food and drink options on offer, including the nutritional content of the food;
(b) The extent of nutritional information made available to potential customers;
(c) The food provenance, quality and cooking methods used;
(d) The extent to which the proposals supports healthy living;
(e) The content and likely effect of any measures proposed to mitigate heath impacts or otherwise support healthy living; and
(f) Any other impacts of the proposals which may have an effect on health and wellbeing, including the economic, environmental and social impacts of the proposal.
In carrying out such an assessment the Boroughs may require a Health Impact Assessment to be carried out. Account must also be taken of any controls or other measures secured by planning condition or section 106 obligation."

Objection to Policy E9 parts C and D and Supporting text at paragraphs 6.9.5 to 6.9.9

1. Introduction

1.1 We have considered policy E9 – Retail, markets and hot food takeaways - and its supporting text with regard to the principles set out within the Framework. McDonald's fully supports the policy aim of promoting healthier living and tackling obesity. However, the proposed policy approach is not a sound or evidence based way of achieving this policy aim – in fact it has been found to be unsound by several planning inspectors. It is too prescriptive and prevents local planning authorities from pursuing more positive policy options. In the one London local authority planning area where such a policy has been in place for nearly a decade (the London Borough of Waltham Forest), its application has proven ineffective in tackling obesity.

1.2 Within these broad points we have the following policy objections:

a. The 400m exclusion zone is inconsistent with national planning policy.

b. The policy is inconsistent, discriminatory and disproportionate.

c. The 400m exclusion zone is not justified by evidence.

d. Examinations of other plans have found similar policy approaches to be unsound.

e. There are better, more positive policy options available that comply with national policy.

1.3 In summary, McDonald's considers that there is no sound justification for a policy such as E9 which imposes a blanket ban on restaurants that include an element of A5 use within 400 m (or any other distance) from schools. Policy E9 D should therefore be deleted from the plan.

1.4 However, as stated above, McDonald's supports the underlying aim of promoting healthier living and tackling obesity. It acknowledges that planning can have a role to play in furthering these objectives. McDonald's would therefore welcome and support proposals for a London wide study of the causes of obesity and their relationship with development proposals, including examination of how new development can best support healthy lifestyles and the tackling of obesity. When a cogent evidence base has been assembled, this can then inform an appropriate policy response. That time has not yet been reached.

1.5 In the alternative, McDonald's proposes alternative policy wording which would secure effective control over new development in a way that distinguishes clearly between development which supports those objectives and development which does not. This alternative policy wording also leaves some discretion to local planning authorities to determine what kind of policy is best for their local circumstances. In this way the strategic role of the London Plan is more effectively and positively achieved.

1.6 The alternative policy wording is set out in appendix 1.

1.7 A summary of technical issues concerning obesity and health is contained in a freestanding appendix. Given the lack of any clear agreement between experts on the indices of obesity or poor health, this evidence is a necessary part of this objection by way of background.

2. The contribution of McDonald's UK to London

2.1.1 This section of the objection sets out some background context relating to McDonald's own business, its contribution to London, and information on the nutritional value and healthy options of the food that it offers in its restaurants. This evidence is relevant to understanding the adverse and unjustified impacts of the blanket approach proposed under policy E9.

Economic and environmental benefits

2.2 London represents an important part of the McDonald's story. We opened our first UK restaurant in Woolwich in 1974. The store continues to operate today and it was also our 3,000th store across the world.

2.3 Today we have 183 restaurants across London, with a presence in every Borough, and are proud to be responsible neighbours in all of these communities.

2.4 In London we employ 15,000 people across 183 restaurants. In 2016, we added £540 million in revenue to the Greater London economy.

2.5 82% of our restaurants in London are owned and operated by 24 franchisees – local entrepreneurs - with the remainder operated by the corporate group (McOpCo).

2.6 Our business and its franchisees have become important members of communities in London: investing in skills and developing our people, supporting local causes and getting kids into football.

2.7 Nationally, the company operates from over 1,250 restaurants and employs just over 115,000 people in the UK. Over 80% of restaurants are operated as local businesses by franchisees.

2.8 McDonald’s is one of few global businesses that continues to anchor itself in high streets and town centres across London. Not just serving the general public but creating jobs and seeking to improve the communities around us.

2.9 All of our restaurants conduct litter picks covering an area of at least 100 metres around the site, at least three times a day, picking up all litter, not just McDonald’s packaging. A number of our London restaurants exceed this requirement, both in terms of distance covered and the frequency of litter patrols while those stores that operate with overnight hours add an additional litter patrol, taking this total up to at least four a day.

2.10 McDonald’s is a founding member of the anti-littering campaign, Love Where You Live. As part of this, our restaurants regularly organise local community litter picks. The campaign has grown and in 2017, 430 events took place across the UK with around 10,000 volunteers involved. Since the campaign started, 2,600 events have taken place with around 80,000 volunteers involved.

2.11 McDonald’s restaurants are operated sustainably. For example our non-franchised restaurants use 100% renewable energy, combining wind and solar and use 100% LED lighting which means we use 50% less energy than fluorescent lighting. All of our used cooking oil is converted into biodiesel for use by our delivery lorries. Our entire fleet of lorries runs on biodiesel, 40% of which comes from our cooking oil. This creates over 7,500 tonnes fewer CO2 emissions than ultra-low sulphur diesel.

2.12 All new McDonald’s restaurants in London are fully accessible and we are working toward delivering this same standard for all existing restaurants.

2.13 Our restaurants provide a safe, warm and brightly lit space for people, especially those who may feel vulnerable or threatened waiting for a taxi or outside. In the immediate aftermath of recent terrorist incidents in the capital, our restaurants that were open at the time, or kept open, acted as points of refuge for members of the public and as a support base for the emergency services.

2.14 Many of our toilets are open to all members of the public. We are one of few night time premises that offer this service and, given the fact we are located in some of the busiest parts of the city, we are helping to keep London clean.

Nutritional value of food and healthy options

2.15 McDonald’s offers a wide range of different food at its restaurants.

2.16 Nutritional information is easy to access and made available online, and at the point of sale on advertising boards, as well as in tray inserts. Information is given on calorie content and key nutritional aspects such as salt, fat and sugar content. This enables an individual is able to identify and purchase food items and combinations that fit in with their individualised calorie or nutritional requirements.

2.17 The menu offer includes a range of lower calorie options, some of which are set out in the tables below.

2.18 The restaurants now suggest meal bundles to assist customers in making informed, healthier choices. McDonald’s have suggested “favourites” meal bundles, across the breakfast and main menu that enable the choice of low calorie options to be made even more easily. These 3-piece meal combinations will all be under 400kcals on the breakfast menu, and all under 600kcals on the main menu (with many options under 400kcals on the main menu also), and all individual items on these menu bundles with be either green (low) or amber (medium) on the Food Standards Agency traffic light system for food labelling.

2.19 Examples of low calorie (less than 400kcals) breakfast options (where no single item is red for FSA) include any combination of the following:

- Egg & Cheese McMuffin / Egg & cheese snack wrap / bagel with Philadelphia / porridge; with fruit bag; and a medium black coffee, or espresso or regular tea or water

2.20 Examples of low calorie (less than 600kcals) main menu options (where no single item is red for FSA) are included in the table below. Some 90% of our standard menu is under 500 calories.

(Please see attached Word document for Tables)

2.21 Those specifically wanting a meal low in either fat, salt, or sugar, can tailor their choices accordingly. Any combination of menu items sold at McDonald’s can be eaten as part of a calorie controlled nutritionally balanced diet. Customers alternatively eat anything from the menu allowing for this within their overall daily, or weekly nutritional requirements.

Quality of ingredients and cooking methods

2.22 We are always transparent about both our ingredients and our processes and we strive to achieve quality. Our chicken nuggets are made from 100% chicken breast meat, our burgers are made from whole cuts of British and Irish beef. Our coffee is fair trade and our milk is organic. We want our customers to be assured about what they are consuming. The 'Good to Know' section on our website - https://www.mcdonalds.com/gb/en-gb/good-to-know/about-our-food.html - provides a range of information about our processes and where our food is sourced from.

Menu improvement and reformulation

2.23 McDonald's is actively and continuously engaged in menu reformulation to give customers a range of healthier options. Louise Hickmott, Head of Nutrition, at McDonald's UK, has provided a letter giving examples of the steps that have been taken in recent years (see appendix 2). The information is summarised below.

2.24 In recent years McDonald's has made great efforts to reduce fat, salt and sugar content across their menu.

- 89% of their core food and drink menu now contains less than 500 kcals.
- Supersize options were removed from their menu in 2004;
- 72% of the Happy Meal menus are classified as not high in fat, salt or sugar according to the Government's nutrient profile model;
- Since October 2015, 50% of the options on the drinks fountain have been no added sugar (Diet Coke, Coke Zero and Sprite Z);
- Recent years have seen the introduction of new items, offering more choice that has included porridge, salads, grilled chicken wraps, carrot sticks, fruit bags including apple and grape, pineapple sticks, and melon chunks, as well as orange juice, mineral water and organic semi-skimmed milk;
- Customers can swap fries for fruit bags, carrot sticks or shake salad on the main menu, or the hashbrown for a fruit bag or carrot sticks on the breakfast menu, at no additional cost;
- In 2014, McDonald's introduced "Free Fruit Fridays" resulting in 3.7 million portions of fruit being handed out. Since then, discounted fruit is now available with every Happy Meal.

Fat

2.25 A recent meta-analysis and systematic review of 72 studies (45 cohort studies and 27 controlled trials) demonstrated that with the exception of Trans Fatty Acids (TFA), which are associated with increased coronary disease risk, there was no evidence to suggest that saturated fat increases the risk of coronary disease, or that polyunsaturated fats have a cardio-protective effect, which is in contrast to current dietary recommendations (Chowdrey et al, 2014).

2.26 However, UK guidelines currently remain unchanged; men should consume no more than 30g of saturated fat per day, and women no more than 20g per day (NHS Choices, 2013). It should be remembered that all fats are calorie dense (9kcal/g) and that eating too much of it will increase the likelihood of weight gain and therefore obesity, indirectly increasing the risk of coronary heart disease, among other co-morbidities.

2.27 What have McDonald's done?

- Reduced the saturated fat content of the cooking oil by 83%;
- Signed up to the Trans Fats pledge as part of the Government's "Responsibility Deal";
- The cooking oil has been formulated to form a blend of rapeseed and sunflower oils to reduce levels of TFA to the lowest level possible;
- They have completely removed hydrogenated fats from the vegetable oils;
- Reduced the total fat in the milkshakes by 32% per serving since 2010;
- Organic semi-skimmed milk is used in tea/coffee beverages and in Happy Meal milk bottles, with lower saturated fat levels compared with full fat variants.

Sugar

2.28 Dietary carbohydrates include sugars, starches and fibre, and each has approximately 4kcals/g.

2.29 The Scientific Advisory Commission on Nutrition (SACN) currently recommends that approximately 50% of total dietary energy intake should be from carbohydrates (SACN Report, 2015). In 2015 SACN recommended that the dietary reference value for fibre intake in adults be increased to 30g/day (proportionally lower in children) and that the average intake of "free sugars" (what used to be referred to as non-milk extrinsic sugars) should not exceed 5% of total dietary energy, which was in keeping with the World Health Organisation (WHO) recommendations.

2.30 Current average intake of free sugars far exceeds current recommendations, and excess intake is associated with dental issues and excess calorie intake which can lead to weight gain and obesity.

2.31 Over the last 10 years our reformulation work has resulted in 787 tonnes less sugar across our menu in 2017 versus 2007. What have McDonald's done?

- Reducing the sugar in our promotional buns, this removed 0.6 tonnes of sugar
- Our Sweet Chilli Sauce has been reformulated to reduce sugar by 14% this equates to 155 tonnes of sugar removed Our Festive Dip has removed 4 tonnes of sugar
- Our famous McChicken Sandwich Sauce has reduced in sugar 45%
- Our Tomato Ketchup has reduced in sugar by 20% which equates to 544 tonnes of sugar removed from the system
- Our Chucky Salsa has reduced in sugar by 28%
- Since 2016 we have reduced the sugar content of Fanta by 54%
- The Toffee Syrup in our Toffee Latte has been reformulated to remove 20% of the sugar
- We have reformulated our Frozen Strawberry Lemonade this has led to 8% sugar reduction per drink

Salt

2.32 A number of health-related conditions are caused by, or exacerbated by, a high salt diet. The strongest evidence links high salt intake to hypertension, stroke and heart disease, although it is also linked with kidney disease, obesity and stomach cancer (Action on Salt website).

2.33 Salt is often added to food for either taste or as a preservative, and in small quantities it can be useful. Adults in the UK are advised not to exceed 6g of salt per day, but the average intake at a population level is consistently higher than this.

2.34 Salt does not directly lead to obesity, however it does lead to increased thirst, and not everyone drinks water or calorie-free "diet" beverages. If our thirst increases and leads to increased consumption of calories from extra fluid intake, then this may lead to increased weight and obesity. 31% of fluid drunk by 4-18 year old children is sugary soft drinks (He FJ et al, 2008), which has been shown to be related to childhood obesity (Ludwig DS et al, 2001).

2.35 What have McDonald's done?

- The salt content across the UK menu has been reduced by nearly 35% since 2005;
- Customers can ask for their fries to be unsalted;
- The salt added to a medium fries has been reduced by 17% since 2003;
- The average Happy Meal now contains 19% less salt than in 2006
- Chicken McNuggets contain 52% less salt than in 2003.

2.36 The process continues. McDonald’s have recently made the following changes to further improve their menu

- Making water the default drink in the Happy Meals;
- Making it easier for people to understand the existence of a wide range of under 400 and 600 calorie meal options that are available.

Third party opinions of McDonald’s

2.37 McDonald’s regularly receive supportive comments from independent third parties.

2.38 Professor Chris Elliott, of the Department for Environment, Food & Rural Affairs’ independent Elliott Review into the integrity and assurance of food supply networks: interim report, December 2013:

“Each supply chain is unique, showing that there is no single approach to assuring supply chain integrity. The review has seen many examples of good industry practice that give cause for optimism. There is not space within this final report to reference all the good industry practices but those that have stood out include McDonald’s and Morrisons.”

2.39 Jamie Oliver, the TV chef, food writer and campaigner speaking in January 2016 at the Andre Simon Food & Drink Book Awards to the Press Association:

“Everyone always liked to poke at McDonald's. McDonald's has been doing more than most mid and small-sized businesses for the last 10 years. Fact. But no one wants to talk about it. And I don't work for them. I'm just saying they've been doing it - 100% organic milk, free range eggs, looking at their British and Irish beef.”

2.40 Raymond Blanc, the TV chef and food writer, speaking in 2014, after having presented McDonald’s UK with the Sustainable Restaurant Association’s Sustainability Hero award:

“I was amazed. All their eggs are free-range; all their pork is free-range; all their beef is free-range.

“[They show that] the fast-food business could change for the better. They’re supporting thousands of British farms, and saving energy and waste by doing so.

“I was as excited as if you had told me there were 20 new three-star Michelin restaurants in London or Manchester.”

2.41 Marco Pierre White, TV chef and food writer, speaking in 2007:

“McDonald's offers better food than most restaurants and the general criticism of the company is very unfair.

"Their eggs are free range and the beef is from Ireland, but you never hear about that. You have to look at whether restaurants offer value for money, and they offer excellent value.”

These comments represent independent opinions.

Supporting active and healthy lifestyles among employees and local communities

2.42 McDonald’s is focused on its people and is proud to have been recognised for being a great employer. For example:

- Great Place to Work 2017 ‘Best Workplaces’ - we are ranked 4th on the Great Place to Work 2017 ‘Best Workplaces’ list (large organisation). This is our 11th year on the list.
- The Sunday Times Best Company to Work for List 2017 - we have made The Sunday Times 30 Best Big Companies to Work for list for the seventh consecutive year, achieving 6th position.
- Workingmums.co.uk Employer Awards 2017- Innovation in Flexible Working - in November 2017, we were awarded the Top Employer for Innovation in Flexible Working by workingmums.co.uk. The judges specifically recognised our approach to Guaranteed Hours contracts.
- The Times Top 100 Graduate Employers - the Times Top 100 Graduate Employers is the definitive annual guide to Britain’s most sought after employers of graduates.
- Investors in People Gold - Investors in People accreditation means we join a community of over 15,000 organisations across 75 countries worldwide and it is recognised as the sign of a great employer.

- School leavers Top 100 Employees - McDonald's UK has been certified as one of Britain’s most popular employers for school leavers in 2017, for the third consecutive year. An award voted for by 15-18 year olds in the UK.

2.43 In April 2017, McDonald’s began to offer employees the choice between flexible or fixed contracts with minimum guaranteed hours. This followed trials in 23 restaurants across the country in a combination of Company owned and franchised restaurants. All of our people have been offered this choice and around 80% of our people have selected to stay on flexible contracts.

2.44 Over the past 15 years, McDonald’s has been proud partners with the four UK football associations: The English Football Association; The Scottish Football Association; The Football Association of Wales; and The Irish Football Association.

2.45 This partnership has seen us support over one million players and volunteers. In London since 2014, more than 1,000 people have attended our Community Football Days and we have distributed 3,328 kits to accredited teams in the Capital. Of the 171 McDonald’s restaurants within the M25, approximately 88 are twinned and actively supporting a local football club.

2.46 We do this work because increasing standards will ultimately create a better experience for young footballers, leading to increased participation and retention of children and young people in sport.

2.47 Our Community Football programme helps to increase participation at all levels. We remain absolutely committed to it and are in the final stages of planning our programme for future years.

Marketing

2.48 As a business we are committed to ensuring our marketing will continue to be responsible and will be used as a positive influence to help our customers make more informed choices.

2.49 We recognise that marketing has a part to play in influencing customers’ choices. We comply, and go beyond, the UK’s stringent regulations on marketing to children and use our marketing to help families understand more about the range of food options we offer.

2.50 We never market products classified as high in fat, salt or sugar to children in any media channel, at any time of the day. We are committed to ensuring that our marketing is always responsible as well as informative, and that it reinforces positive food messages.

2.51 In addition, we go beyond the regulations in a lot of cases. For example, when advertising a Happy Meal, we only ever do so with items such as carrot sticks, a fruit bag, milk or water to ensure we are not marketing HFSS food to children. We have done this voluntarily since 2007.

Summary

2.49 In the light of the above it is clear that McDonald's restaurants offer the capital considerable and substantial economic benefits, are supportive of active and healthy lifestyles, and enable customers to make informed, healthy choices from the wide ranging menu options available. It is important that this is acknowledged, given the assumption in the draft policy E9 that all A5 uses should be restricted, and given the policy aim – which McDonald's supports – of promoting healthier lifestyles and tackling obesity.

2.50 We turn now to the main points of objection.

3. The 400m exclusion zone is inconsistent with National Policy

Introduction

3.1 This section of the objection considers the proposed policy against national policy. The lack of evidence to support the policy is considered in the next section.

3.2 National policy contains no support for a policy approach containing a blanket ban or exclusion zone for A5 (or indeed any other) uses. Such an approach conflicts sharply with central planks of Government policy such as the need to plan positively and support economic development, and in particular the sequential approach that seeks to steer town centre uses – which include A5 uses - to town centres.

3.3 We note that the draft London Plan itself (paragraph 6.9.5) inevitably confirms in bold text that a "diverse range of uses" support the vitality and viability of town centres. This includes A5 uses, yet the policy restricts such uses in these locations.

Practical impacts

3.4 The practical impact of the policy on undermining the sequential approach and driving development away from town centres – which is where it is needed – is graphically shown by Dan Cookson's map of the 400m exclusion zones (published by the BBC - http://www.bbc.co.uk/news/health-42172579) found in appendix 3. This shows that by introducing this policy across Greater London there would be virtually nowhere for a new hot food takeaway to open. The plan shows centred circles at 400m, rather than 400m walking distance proposed by the policy. However, it is a good approximation of the impact of the policy on a strategic, London wide basis. It demonstrates that town centres across London would be subject to the exclusion zone. The Mayor's policy team do not appear to have fully assessed the potential impact of the policy. It essentially creates a moratorium against A5 uses leaving nowhere reasonable for them to locate. This goes against national planning policy in that it contradicts paragraph 20 of the framework, which states: *To help achieve economic growth, local planning authorities should plan proactively to meet the development need of business and support an economy fit for the 21st century.*

3.5 Part D of the policy assumes that there will be areas where A5 uses will be outwith the 400m, however the map referenced above confirms this unlikely.

Conflict with national policy

3.6 Restricting both the concentration and the location of new A5 proposals (and the like) within London is not a positive approach to planning. The Framework "foreword" states that sustainable development is about positive growth, making economic; environmental; and social progress, for this and future generations.

3.7 The suggested restrictions within policy E9 C & D take an ambiguous view of A5 uses in relation to the proximity to existing and proposed primary and secondary schools. The policy would apply an over-generic approach to restrict development with little sound planning reasoning or planning justification. This is contrary to Paragraph 14 of the Framework that advises authorities to positively seek opportunities to meet development needs of their area.

3.8 In addition, this approach is inconsistent with Paragraph 19 and 21 of the Framework. Paragraph19 states: *Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.*

3.9 Paragraph 21 states: *Investment in business should not be over-burdened by the combined requirements of planning policy expectations.*

3.10 As explained later in this objection, there is a lack of evidence to demonstrate the link between fast food, school proximity and obesity. The need for evidence is emphasised in paragraph 158 of the Framework that states that each local plan should be based on adequate, up-to-date and relevant evidence. Neither the policy nor the supporting text address this point. Policy needs to be based on evidence.

3.11 Paragraph 23 states:

Planning Policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. In drawing up Local Plans, local planning authorities should;

- *Recognise town centres as the heart of their communities and pursue policies to support their viability and vitality;*
- *Promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres;*
- *Retain and enhance existing markets and, where appropriate, re-introduce or create new ones, ensuring that markets remain attractive and competitive;*
- *Allocate a range of suitable sites to meet the scale and type of retail, development needed in town centres. It is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites;*
- *Where town centres are in decline, local planning authorities should plan positively for their future to encourage economic activity.*

3.12 The policy is likely to be very damaging to London’s economy due to the fact that it is restricting hot food takeaways to such an extreme level without any regard to the local area or the economy.

3.13 There is also conflict with the sequential test requirements, which has its own locational requirements. Paragraph 24 of the Framework is clear in its expectation that an up to date local plan with adopt the sequential approach, and that local authorities should “require” applications for main town centre uses to locate in town centres. The sequential approach would be seriously undermined by the approach proposed in the London Plan.

3.14 The Framework cannot be interpreted to provide generic restrictions on a particular use class. There is no basis for such a blanket approach in the Framework or Planning Practice Guidance. In fact, the Planning Practice Guidance emphasises that planning authorities should look at the specifics of a particular proposal and seek to promote opportunity rather than impose blanket restrictions on particular kinds of development. In the section on “Health and Wellbeing”:

3.15 Paragraph: 002 (Reference ID: 53-002-20140306) states that in making plans local planning authorities should ensure that: *“opportunities for healthy lifestyles have been considered (eg planning for an environment that supports people of all ages in making healthy choices, helps to promote active travel and physical activity, and promotes access to healthier food, high quality open spaces, green infrastructure and opportunities for play, sport and recreation);”*

3.16 Paragraph: 006 (Reference ID: 53-006-20170728) says that a range of criteria should be taken into account, including not just proximity to schools but also wider impacts. It does not support a blanket exclusion zone. Importantly, the criteria listed are introduced by the earlier text which states that “Local planning authorities can have a role in enabling a healthier environment by supporting opportunities for communities to access a wide range of healthier food production and consumption choices.”

3.17 Paragraph: 004 (Reference ID: 53-004-20140306) advises that a Health Impact Assessment should be considered in planning decision making, and that the scope for planning conditions and a section 106 obligation to address issues should also be taken into account.

3.18 The above guidance serves to emphasise why it is important to look at particular proposals as a whole, rather than adopting a blunt approach that treats all proposals that include an A5 use as being the same.

3.19 It should be noted that the objector’s alternative policy would not result in any inevitable conflict with the sequential approach. In addition, by setting criteria and requiring a health impact assessment, it would encourage more healthy practices among food retailers. This would satisfy the policy aim for positive planning, and the policy aim of positively supporting healthier development and healthier life styles.

4. The policy is inconsistent, discriminatory and disproportionate

4.1 The policy aims to address obesity and unhealthy eating but instead simply restricts new development that comprises an element of A5 use. Yet A1 retail outlets and A3 food and drink uses can also sell food that is high in calories, fat, salt and sugar, and low in fibre, fruit and vegetables, and hot food from an A3 unit can be delivered to a wide range of locations, including schools. This means that the policy takes an inconsistent approach towards new development that sells food, and discriminates against operations with an A5 use. It also means that the policy has a disproportionate effect on operations with an A5 use.

4.2 The test of soundness requires that the policy approach is “justified”, which in turn means that it should be the most appropriate strategy when considered against the reasonable alternatives, and based on proportionate evidence (paragraph 182 of the Framework).

4.3 Given the objectives of the policy, it ought to apply equally to all relevant food retailers.

4.4 The table below shows the kind of high calorie, low nutritional value food that can be purchased from a typical A1 high street retailer at relatively low cost. It is contrasted with the kind of purchase that could be made at a McDonald’s. The evidence provided at Appendix 4 confirms that 70% of purchases by students in the school fringe are purchased in non-A5 shops.

(Please see attached Word Doc for Tables)

4.5 If the policy is to be based on Use Classes, then the proposed policy should place restrictions on other use classes in addition to class A5. In fact, by restricting A5 uses only, the policy would encourage food purchases at other locations.

4.6 Finally, it is important that for the majority of days in the year (weekends and school holidays combined) schools are not open at all. Research by Professor Peter Dolton of Royal Holloway College states that “At least 50% of the days in a year kids don’t go to school if we count weekends and holidays and absence. They are only there for 6 hours and all but 1 are lessons. So only around 2-3% of the time can [children] get fast food at school.”2

4.7 For the minority of the year when schools are open, it is important to recognise that many schools have rules preventing children from leaving the school grounds during the school day, and in any event proximity to schools has no conceivable relevance outside of the particular times when children are travelling to or from school in circumstances where their route takes them past the development proposal.

4.8 The policy's blanket approach fails to acknowledge that the opportunity for children to access A5 development as part of a school day is extremely limited. The complete ban is wholly disproportionate to the circumstances when the concern underlying the policy might arise. Only limited purchases of food are made at A5 uses on journeys to and from school. Further details are set out in Appendix 5.

4.9 Our alternative policy approach (appendix 1) would address this point by focusing on the actual impacts of the proposal rather than the use class.

5. The policy is not justified because of a lack of evidence base

5.1 The test of soundness requires policy to be evidence based. There is no evidence of any causal link between the presence of A5 uses within 400m of schools and increases in obesity or poor health outcomes. In fact, the studies that have considered whether such a causal connection exists have found none.

5.2 Public Health England (PHE), which is part of the Department of Health and Social Case, expressly accept that the argument for the value of restricting the growth in fast food outlets is only "theoretical" based on the "unavoidable lack of evidence that can demonstrate a causal link between actions and outcomes." 3

5.3 A systematic review of the existing evidence base by Oxford University (December 2013), funded by the NHS and the British Heart Foundation 'did not find strong evidence at this time to justify policies related to regulating the food environments around schools.' It instead highlighted the need to 'develop a higher quality evidence base'. {reference needed}4

5.4 The range of US and UK studies used to support many beliefs about obesity, including the belief that the availability of fast food outlets increased obesity, was comprehensively reviewed in papers co-written by 19 leading scientists in the field of nutrition, public health, obesity and medicine. Their paper "Weighing the Evidence of Common Beliefs in Obesity Research" (published in the Critical Review of Food, Science and Nutrition (Crit Rev Food Sci Nutr. 2015 December 6; 55(14) 2014-2053) found that the current scientific evidence did not support the contention that the lack of fresh food outlets or the increased number of takeaway outlets caused increase obesity (see pp16-17 of the report).

5.5 The draft policy refers to the views of "a wide range of health experts" but there appears to have been no critical assessment of what these views are based on and whether the underlying evidence supports those views or the proposed policy approach. It does not.

5.6 In this context, it is important to consider the evidence from Waltham Forest which introduced a school proximity policy in 2008 – about a decade ago. Over that period, the Public Health England data for the Borough shows that there has been no discernible impact on childhood obesity rates – with these actually worsening in recent years. The borough's Health Profile for 2017 records childhood obesity (year 6) at 26.1% up from 20.3% in 2012, the year London hosted the Olympic Games.

5.7 While it is accepted that the causes of obesity are complex, it is clear that the exclusion zone policy had no discernible effect in Waltham Forest. It is clear that more research and investigation is needed before such a policy approach can be justified by evidence.

6. Similar policies have been found unsound when promoted in other plans

6.1 The lack of evidence between proximity of takeaways to schools and its impact on obesity has been confirmed in a number of planning decisions.

6.2 In South Ribble the Planning Inspectorate raised concerns about a similar 400m school proximity restriction on fast food, stating 'the evidence base does not adequately justify the need for such a policy', and due to the lack of information, it is impossible to 'assess their likely impact on the town, district or local centres'. 5

6.3 Similarly, research by Brighton & Hove concluded that 'the greatest influence over whether students choose to access unhealthy food is the policy of the individual schools regarding allowing students to leave school premises during the day'.6

6.4 The recent Inspectors response to the London Borough of Croydon (January 2018) regarding a similar prohibition on A5 uses, (where a similar campaign to persuade takeaway proprietors to adopt healthy food options existed) confirmed that the councils own 'healthy' plans would be stymied by the proposed policy, as would purveyors of less healthy food. The policy failed to distinguish between healthy and unhealthy takeaway food, and "confounds its own efforts to improve healthiness of the food provided by takeaway outlets" and failed to "address the demand for the provision of convenience food". The Inspector concluded that because the reasons for the policy do not withstand scrutiny, they must be regarded as unsound.

6.5 The proposed policy E9, with its blanket prohibition on A5 uses is similarly unsound.

7. Alternative approaches

7.1 McDonald’s considers that there is no sound justification for a policy such as E9 which imposes a blanket ban on restaurants that include an element of A5 use within a particular distance from schools. Policy E9 D should therefore be deleted from the plan.

7.2 McDonald’s would welcome and support proposals for a London wide study of the causes of obesity and their relationship with development proposals, including examination of how new development can best support healthy lifestyles and the tackling of obesity. When a cogent evidence base has been assembled, this can then inform an appropriate policy response. That time has not yet been reached.

7.3 In the alternative, the policy should be redrafted to allow Boroughs the discretion to introduce criteria based policies that assess the actual impacts of proposals in the particular circumstances of each case. This alternative approach would ensure that development plan policies adopted at the Borough level were evidence based and that planning applications were only allowed – or only refused – where the evidence justified it. It would result in a more consistent and fairer policy approach. It would also ensure that the underlying aims of promoting healthier living and tackling obesity were met in a positive way without undermining the social, economic and environmental benefits that some development involving A5 uses could bring.

7.4 A proposed redrafted policy is attached in appendix 1, and it is self-explanatory. By setting the framework for a criteria based approach, requiring evidence about particular proposals, and adopting the Planning Practice Guidance advice on the use of health impact assessments, the alternative policy is undoubtedly a sound approach.

7.5 If such a policy were not considered appropriate, a more limited re-writing of the draft policy so as to require Boroughs to adopt criteria based policies based on evidence could be used, in preference to the current draft proposal for a blanket ban.

8 Conclusions

8.1 McDonald’s supports the policy objective of promoting healthier lifestyles and tackling obesity. It does not consider that the proposed policy E9 is a sound way of achieving those objectives.8.2 The underlying assumption in the policy is that all A5 uses (and any restaurants with an element of A5 use) are inherently harmful to health. In fact, this is not supported by evidence. McDonald’s own business is an example of a restaurant operation which includes A5 use but which offers healthy meal options, transparent nutritional information to allow healthy choices, and quality food and food preparation. The business itself supports healthy life styles through the support given to its staff and support given to football in the communities which the restaurants serve.

8.2 In addition, the policy fails to acknowledge the wider benefits that restaurants can have, including benefits relevant to community health and wellbeing. McDonald's own business is an example of a restaurant operation that supports sustainable development through the use of renewable energy, the promotion of recycling, the use of energy and water saving devices. The economic benefits of its restaurants in supporting town centres and providing employment opportunities and training are substantial, and important given that improved economic circumstances can support improved health.

8.3 The policy fails to acknowledge that food choices which are high in calories and low in nutritional value are made at premises trading with A1 and A3 consents, and can be delivered from the latter. The policy makes no attempt to control these uses.

8.4 For the reasons given in this objection the proposed policy is very clearly inconsistent with government policy on positive planning, on supporting economic development and the needs of businesses, on supporting town centres, and on the sequential approach. There is no justification in national policy for a blanket exclusion zone based applied to A5 uses. The effect of the policy had it existed in the past would have been to exclude restaurants such as McDonald's from major commercial and tourist areas such as Oxford Street and Westfield shopping centres.

8.5 For the reasons given in this objection the proposed policy lacks a credible evidence base, and similar policies have been found to be unsound by inspectors who have examined other plans. In the one London Borough that has had a similar policy for about a decade (LB Waltham Forest), it has had no discernible effect on obesity levels, which have in fact increased.

8.6 McDonald's would welcome and support proposals for a London wide study of the causes of obesity and their relationship with development proposals, including examination of how new development can best support healthy lifestyles and the tackling of obesity. When a cogent evidence base has been assembled, this can then inform an appropriate policy response. That time has not yet been reached.

8.7 In the alternative, it has proposed alternative policy wording that allows Boroughs to adopt criteria based policies that would focus on the actual impacts of proposals rather than making unjustified assumptions and imposing blanket controls in relation to a particular Use Class. Such a policy would be the best and a sound way of achieving the objectives of the London Plan, in the absence of the London wide study which McDonald's would like to see carried out.

Appendix 3 - Food in the school fringe tends to be purchased in non-A5 properties

Food in the school fringe tends to be purchased in non-A5 properties.

1. Research by Professor Jack Winkler (London Metropolitan University) into the ‘school fringe’ – found just 3/10 purchases by students in a 400m school fringe were made in A5 properties.7

2. 70% of purchases in the school fringe were made in non-fast food outlets, and the same research concluded *‘the most popular shop near Urban was the supermarket, with more visits than all takeaways put together’.*

3. Professor Winkler’s findings are not an isolated case. A report by Public Health England and the LGA states that fast food school proximity restrictions do *‘not address sweets and other high-calorie food that children can buy in shops near schools.’8*

4. Research by Brighton and Hove found that *‘Newsagents were the most popular premises [in the school fringe], with more pupils visiting newsagents than any A5 premises’.9*

5. Likewise, research for the Food Standards Agency on purchasing habits in Scotland found that *‘Supermarkets were the place that children reported they most frequently bought food or drinks from at lunchtime’.10*

Appendix 5 -

6. Indeed, there are several more researchers who have found no evidence to support the hypothesis that less exposure to fast food, or better access to supermarkets are related to higher diet quality or lower BMI in children.11 12 13

Only a limited number of journeys to and from school involve a purchase at a food outlet.

1. This has been confirmed in research by the Children’s Food Trust, which found that only 8% of all journeys to and from school included a purchasing visit to a food outlet.14

2. Of the food purchases made on school journeys, confectionary was the most popular item sold – which McDonald’s does not offer on its menu.

3. Likewise, research by Ashelsha Datar concluded that children *‘may not purchase significant amounts of junk food in school’* – partly due to *‘fewer discretionary resources to purchase them’.15*

4. Indeed, even where purchases were made, *‘children may not change their overall consumption of junk food because junk food purchased in school simply substitutes for junk food brought from home.’*

5. Similarly, research by Fleischhacker highlighted the need for future school-based studies to *‘gather information on whether or not the students attending the studied schools actually eat at the restaurants near their schools.’16*

6. This was also highlighted in the systematic review by Oxford University, which states *‘future work should also incorporate a child’s usual mode of travel to and from school into decisions about appropriate buffer distances.*’ The review added that age should also be taken into consideration, as this can impact on travel time and the availability of pocket change.17

References

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4 J Williams, P Scarborough, A Matthews, G Cowburn, C Foster, N Roberts and M Rayner, Nuffield Department of Population Health, University of Oxford, page 13, 11th December 2013. A systematic review of the influence of the retail food environment around schools on obesity-related outcomes.

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13 Timperio, A.F., et al., Children's takeaway and fast-food intakes: associations with the neighbourhood food environment. Public Health Nutrition,, 2009. 12(10): p. 1960-4.

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16 S Fleischhacker et al. A systematic review of fast food access studies, page 9, 17th December 2009

17 J Williams, P Scarborough, A Matthews, G Cowburn, C Foster, N Roberts and M Rayner, Nuffield Department of Population Health, University of Oxford, page 13-14, 11th December 2013. A systematic review of the influence of the retail food environment around schools on obesity-related outcomes.

(See full PDF document and the freestanding appendix titled ‘Obesity and Health’ for full response.)

User:	McDonald's Restaurants Ltd

Suggested Alternative policy wording

"D Where development proposals involving A3 uses that can delivery food A5 hot food takeaway uses are permitted, these should be conditioned to require the operator to achieve, and operate in compliance with, the Healthier Catering Commitment standard."

(See full PDF document and the freestanding appendix titled ‘Obesity and Health’ for full response.)

User: McDonald's Restaurants Ltd

Objection to Policy E9 parts C and D and Supporting text at paragraphs 6.9.5 to 6.9.9

3. The 400m exclusion zone is inconsistent with National Policy

Introduction

3.1 This section of the objection considers the proposed policy against national policy. The lack of evidence to support the policy is considered in the next section.

3.2 National policy contains no support for a policy approach containing a blanket ban or exclusion zone for A5 (or indeed any other) uses. Such an approach conflicts sharply with central planks of Government policy such as the need to plan positively and support economic development, and in particular the sequential approach that seeks to steer town centre uses – which include A5 uses - to town centres.

3.3 We note that the draft London Plan itself (paragraph 6.9.5) inevitably confirms in bold text that a “diverse range of uses” support the vitality and viability of town centres. This includes A5 uses, yet the policy restricts such uses in these locations.

(See full PDF document and the freestanding appendix titled ‘Obesity and Health’ for full response.)

User: McDonald's Restaurants Ltd

Suggested Alternative policy wording

"6.9.6 Obesity is one of the greatest health challenges facing the capital. In London 38 per cent of Year 6 pupils (10 to 11 year-olds) are overweight or obese – higher than any other region in England. Children living in the most deprived areas of London are twice as likely to be obese as children living in the least deprived areas. The creation of a healthy food environment, including access to fresh food, is therefore important. So too is the need to support economic growth. The number of hot food takeaways in London has been steadily rising, with London boroughs having some of the highest densities of hot food takeaways in England. More deprived areas commonly have a higher density of hot food takeaways than other areas."

(See full PDF document and the freestanding appendix titled 'Obesity and Health' for full response.)

User: McDonald's Restaurants Ltd

School proximity policy

Suggested Alternative policy wording

"6.9.7 Hot food takeaways *generally(remove)* often sell food that is high in calories, fat, salt and sugar, and low in fibre, fruit and vegetables. There is evidence that regular consumption of energy-dense food from hot food takeaways is associated with weight gain, and that takeaway food is appealing to children. However, it is also recognised that not all hot food takeaways are the same in terms of the range and quality of food on offer. It is also acknolwedged that food that is high in calories, fat, salt and sugar, and low in fibre, fruit and vegetables may also be purchased in shops trading with A1 consents, and may be delivered from restaurants trading with A3 consents. Therefore a blanket control on new development based only on its Use Class cannot be justified, and may simply divert purchases to A1 and A3 developments.

6.9.7A. It is recognised that the causes of obesity are complex and the result of a number of factors, and that a broad package of measures is required to reduce childhood obesity within London. While a *A wide(remove)* range of health experts recommend restricting the proliferation of hot food takeaways, particularly around schools, in order to help create a healthier food environment, evidence of a causal connection between the presence of hot food takeaways and increases in obesity is lacking. Shift and night-time workers may also find it particularly difficult to access healthy food due to the limited options available to them at night time where there are no food outlets selling healthy eating options. It is recognised that some developments that include A5 uses offer a wide range of choice including healthy meal options, and provide customers with nutritional information to inform their decisions. Development may also support heath and wellbeing through its social, economic and environmental benefits. Therefore, in setting local development plan policy, Boroughs should adopt an approach that assesses the impacts of the particular proposals and considers the extent to which mitigating measures or other beneficial aspects of a proposal can be secured by condition or section 106 obligation. National Planning Guidance supports the use of Health Impact Assessments for this purpose and their use is supported by the Mayor."

(See full PDF document and the freestanding appendix titled ‘Obesity and Health’ for full response.)

User:	London Borough of Richmond Upon Thames

Welcome reference to consolidating retail where there is a surplus in B. Continued recognition and support for markets is noted and welcomed. Strong support for the principle of controlling hot food takeaways as the Council already has a similar policy.

User: TAFS Foods Ltd

We understand child obesity is particular cause for concern and agree with any reasonable strategy that will be effective in tackling the issue, however are concerned that draft policy E9.C which seeks to restrict A5 ‘hot food takeaway’ permissions, may not be the most effective solution and may result in unintended implications. It may impact the growth of local businesses, including franchisees like ours, whilst allowing others (which sell a variety of foods, including snacks and takeaway options) to grow.

We would like to propose that rather than enforce policy that looks to restrict A5 consents, the government and food to go industry at large (including local independent and franchisee businesses like us) work together to improve the integrity of the food environment, which would arguably have much greater impact.
In this representation, we outline the concerns we have with the proposed policy to apply a zonal restriction to new A5 approvals and put forward some alternative solutions.

A Holistic, Lifestyle Approach is required to tackle Obesity, Involving Input from a Wide Variety of Stakeholders

Obesity has many complex, interrelated causes and requires a sophisticated and thoroughly considered approach to tackle the problem. We believe that rather than use planning policy to address the issue, it would be more effective for the industry to work together to devise a measure that tackles calorie reduction across all food and drink establishments.

Furthermore, we believe that more research is required to understand the impact of the whole food environment around schools and what the best solution may be. We understand our franchisor KFC (UK) Ltd would be prepared to invest in such a study, which would include a review of the effectiveness of implementing zonal A5 restrictions and any unintended impacts they have.

Some proposals that we suggest may be more effective in addressing the nation’s health include:

- All food establishments to sign up to a set of national standards, so that the whole food environment that children are exposed to is targeted
- Rather than apply a zonal restriction on A5 uses, it may be more appropriate to consider the density of hot food establishments locally within an area

- Ensure local authorities are fully supported in addressing key determinants of obesity, for example through providing facilities that encourage physical activity
- If a zonal restriction is to be adopted:
    - Only apply to secondary schools given primary school children would ordinarily be supervised by adults when going to/from school and are unable to leave during lunch breaks.
    - It should possibly apply to a zonal area where causality between hot food takeaways and obesity levels has been identified, however more research would be required to find evidence of causality before implementation.

We believe that if the government and food to go industry at large (including local independent and franchisee businesses like us) worked together to improve the integrity of the food environment, it would arguably have much greater success in reducing child obesity, without unintended implications, such as loss of jobs or investment.

We understand our franchisor brands are currently looking into ways in which they can improve the nutritional value of their offering and look forward to working with them on these initiatives.

A Zonal Restriction on A5 Permissions may not be the most Effective way to improve the Nation's Health

The Draft London Plan proposes placing a zonal restriction on A5 consents, however use class does not measure the nutritional value of food. Many food establishments have a takeaway option with children forming part of their customer base, but operate under a different use class to A5 and thus would not be impacted by the planning restrictions. Examples include bakeries, sandwich and baguette shops, coffee shops, burger and chicken 'eat in' restaurants with a takeaway facility, newsagents, supermarkets and convenience stores. These establishments sell a variety of foods, including snacks and treats.

Children come into contact with a range of food and drink establishments on their way to and from school and so it is unknown whether placing restrictions on A5 permissions within 400m of a school would have any impact on obesity levels. It may arguably be better to consider the density of hot food establishments within an area or require all food establishments to sign up to a set of national standards, so that the whole food environment that children are exposed to is targeted.

We should also consider that the policy applies to both primary and secondary schools, yet primary school children are ordinarily supervised going to/from school and cannot leave during lunch time. If a zonal restriction is to be applied, there may be merit in applying it only to secondary schools, so as to reduce unintended consequences without impacting effectiveness of the policy.

The Proposal may Impact the Growth of Local Businesses, including Independents, Franchisees and Eat-in Restaurants Expanding through Delivery Sales

Many hot food takeaways are independent or run by local franchisees and the proposed measure could significantly impact our businesses. We are looking to expand further across London and have identified restaurants for development in Old Street, Romford and South London. It is unknown whether the proposed measure will prevent us from future expansion across London boroughs, not only hindering our potential to grow, but also our ability to invest back into our business and continually improve our offering. Income from opening new restaurants can be used to enhance the in-store experience, pay better wages, create more jobs and test new initiatives, for example by trailing healthier options on our menus. If the proposed measure is implemented, it may discourage businesses like ours from investing in such initiatives, which would in turn act as a preventive measure towards the goal of improving the integrity of the whole food environment.

Should the proposal go ahead there would be few places for new hot food takeaways to open across London. There doesn’t appear to be suggestion that there is no requirement for hot food takeaways across the capital and so another solution could be to establish the optimum number that balances retail and public health. It may be useful for further research to be undertaken to determine what this optimum number looks like, a proposal we understand our franchisor KFC Ltd would be prepared to invest in.

We are a franchisee with 15 restaurants within London and employ c. 500 people within this area. We, like many other employers in the hot food takeaway sector are a key employer of young people and offer flexible work and excellent development opportunities. If the proposed policy were implemented, there is risk that future job opportunities offered by us and the wider sector from the opening of new restaurants would be impacted. Should areas outside of London also adopt such policy, the number of job opportunities affected could magnify. Revenues raised through business rates, employment taxes and section 106 payments should also be taken into account.

The proposed restriction on A5 permissions could result in a wider unforeseen impact on the convenience economy of food delivery, not only impacting independent & local franchisee businesses like ours but also eat-in restaurants looking to increase sales via home delivery. If they wish to expand through delivery sales, they may soon require A5 consents and may be restricted in obtaining these through the proposal.

Due to the forces of supply and demand, an increase in rents on A5 premises could also lead to more vacant premises on the high street and less competition. There is also risk that operators may be incentivised to delay selling sites until premiums have risen, initially reducing supply of property.

Further research on the implications of placing restrictions on A5 uses would be valuable, so that the wider economic and social influences and impact on the food and drink sector specifically are fully understood.

The Requirements for Food & Drink Establishments vary across Different Areas of London

The proposal to apply a blanket restriction on the granting of new A5 permissions within 400m of all primary and secondary schools within London should take into consideration the unique development requirements of different areas across London.

Some areas will have a wider food and drink offering than others, some will require greater levels of investment and job creation. The proposed policy to apply a uniform ban on hot food establishments may not take into account this disparity, preventing economic growth and high street regeneration in those areas that require it, whilst effecting customer choice.

We should also consider that affordable food and drink establishments can act as an important social hub for people who feel lonely and can act as a ‘safe space’ where people can socialise. This community requirement will be greater in different areas of London.

Our business has formed part of the rich tapestry of food offerings in London for 40 years and serves an important social role in communities. We hope that the new restaurants we plan to build would continue to add value to London neighbourhoods.

If planning policy is to be used as a solution, the implications of using such policy should be analysed and local requirements considered. Local authorities currently have powers to manage over-concentrations of A5 uses via development plans, and so a solution that enforces better adoption of these powers may be more effective in enabling a tailored resolution, accounting for local needs.

There is Limited or No Evidence that the Proposed Measure would be Effective:

We have seen limited or no evidence to demonstrate a causal link between the incidence of childhood obesity and proximity of hot food takeaway establishments to schools, thus the impact of the proposed policy on obesity levels, which has complex and multiple causes, is unclear.

We agree that causes of obesity are complex and a broad package of measures is required to reduce child obesity, however believe that proposed measures to address the issue that may result in change to high streets and possibly unintended economic and social impacts, should be based on evidence of effectiveness.

There appears to be limited or no evidence of a causal relationship. For example, a study by Fraser et al (2010) found positive correlation between density and higher deprivation, and between density and being overweight or obese. These relationships are also referenced in the draft London plan (paragraph 6.9.6). The study didn't however find an association between distance and obesity, despite measuring against this.

Public Health England report 'Obesity and the environment' (2014) outlines a lack of evidence that can demonstrate a causal link between actions and outcomes of food-choices of school children in and around school, however states some limited evidence of associations between obesity and fast food exist. Williams, J et al (2014) also found there was no strong evidence to justify policies related to regulating the food environments around schools, recognising inconsistencies across studies in definitions of "fast food outlets" and other key variables.

The impact of limiting the concentration of hot food takeaway establishments within an area can also lead to perhaps unexpected results. A study commissioned by the Independent to investigate the characteristics of an "obesogenic" environment split residential areas in Yorkshire into five types, based on the number of food outlets and opportunities for physical activity: saturated; moderate availability; low availability; moderate physical activity, limited food; and moderate physical activity, ample food. Analysis showed that of the 2 neighbourhood types associated (negatively and positively) with obesity, saturated neighbourhoods (with a high number of fast-food outlets, convenience stores, supermarkets, gyms and parks) had 14% lower risk of obesity whilst moderate-availability neighbourhoods were associated with an 18% higher risk of obesity. It was argued that those living in less saturated neighbourhoods would be more likely to drive to work and the shops and therefore undertake less physical activity.

Given that there is limited or no evidence regarding the effectiveness of imposing restrictions on A5 permissions in order to reduce child obesity levels, it is recommended that further study is undertaken so that an effective method, that can be adapted for local councils' needs, is undertaken.

Summary

We recognise that obesity is a major health challenge facing the capital and would like to propose that rather than enforcing policy that looks to restrict A5 permissions the food to go industry at large (including local independent and franchisee businesses like ours) work together with the government to improve the integrity of the whole food environment and consider alternative solutions to address the problem outlined in this representation.

If we can set an industry standard across multiple food formats, the collective benefits to London and society in general could be substantial. This would arguably have much greater success in reducing child obesity, without unintended economics and social consequences.

We believe that if we work together to evaluate other options, including the solutions proposed in this representation, we can develop the optimal solution for addressing the nation’s health.

User: Scotco Restaurants Ltd

We understand child obesity is particular cause for concern and agree with any reasonable strategy that will be effective in tackling the issue, however are concerned that draft policy E9.C which seeks to restrict A5 ‘hot food takeaway’ permissions, may not be the most effective solution and may result in unintended implications. It may impact the growth of local businesses, including franchisees like ours, whilst allowing others (which sell a variety of foods, including snacks and takeaway options) to grow.

We would like to propose that rather than enforce policy that looks to restrict A5 consents, the government and food to go industry at large (including local independent and franchisee businesses like us) work together to improve the integrity of the food environment, which would arguably have much greater impact.
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Furthermore, we believe that more research is required to understand the impact of the whole food environment around schools and what the best solution may be. We understand our franchisor KFC (UK) Ltd would be prepared to invest in such a study, which would include a review of the effectiveness of implementing zonal A5 restrictions and any unintended impacts they have.

Some proposals that we suggest may be more effective in addressing the nation’s health include:

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The Draft London Plan proposes placing a zonal restriction on A5 consents, however use class does not measure the nutritional value of food. Many food establishments have a takeaway option with children forming part of their customer base, but operate under a different use class to A5 and thus would not be impacted by the planning restrictions. Examples include bakeries, sandwich and baguette shops, coffee shops, burger and chicken 'eat in' restaurants with a takeaway facility, newsagents, supermarkets and convenience stores. These establishments sell a variety of foods, including snacks and treats.

Children come into contact with a range of food and drink establishments on their way to and from school and so it is unknown whether placing restrictions on A5 permissions within 400m of a school would have any impact on obesity levels. It may arguably be better to consider the density of hot food establishments within an area or require all food establishments to sign up to a set of national standards, so that the whole food environment that children are exposed to is targeted.

We should also consider that the policy applies to both primary and secondary schools, yet primary school children are ordinarily supervised going to/from school and cannot leave during lunch time. If a zonal restriction is to be applied, there may be merit in applying it only to secondary schools, so as to reduce unintended consequences without impacting effectiveness of the policy.

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Should the proposal go ahead there would be few places for new hot food takeaways to open across London. There doesn’t appear to be suggestion that there is no requirement for hot food takeaways across the capital and so another solution could be to establish the optimum number that balances retail and public health. It may be useful for further research to be undertaken to determine what this optimum number looks like, a proposal we understand our franchisor KFC Ltd would be prepared to invest in.

We are a franchisee with 15 restaurants within London and employ c. 500 people within this area. We, like many other employers in the hot food takeaway sector are a key employer of young people and offer flexible work and excellent development opportunities. If the proposed policy were implemented, there is risk that future job opportunities offered by us and the wider sector from the opening of new restaurants would be impacted. Should areas outside of London also adopt such policy, the number of job opportunities affected could magnify. Revenues raised through business rates, employment taxes and section 106 payments should also be taken into account.

The proposed restriction on A5 permissions could result in a wider unforeseen impact on the convenience economy of food delivery, not only impacting independent & local franchisee businesses like ours but also eat-in restaurants looking to increase sales via home delivery. If they wish to expand through delivery sales, they may soon require A5 consents and may be restricted in obtaining these through the proposal.

Due to the forces of supply and demand, an increase in rents on A5 premises could also lead to more vacant premises on the high street and less competition. There is also risk that operators may be incentivised to delay selling sites until premiums have risen, initially reducing supply of property.

Further research on the implications of placing restrictions on A5 uses would be valuable, so that the wider economic and social influences and impact on the food and drink sector specifically are fully understood.

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The proposal to apply a blanket restriction on the granting of new A5 permissions within 400m of all primary and secondary schools within London should take into consideration the unique development requirements of different areas across London.

Some areas will have a wider food and drink offering than others, some will require greater levels of investment and job creation. The proposed policy to apply a uniform ban on hot food establishments may not take into account this disparity, preventing economic growth and high street regeneration in those areas that require it, whilst effecting customer choice.

We should also consider that affordable food and drink establishments can act as an important social hub for people who feel lonely and can act as a ‘safe space’ where people can socialise. This community requirement will be greater in different areas of London.

Our business has formed part of the rich tapestry of food offerings in London for 40 years and serves an important social role in communities. We hope that the new restaurants we plan to build would continue to add value to London neighbourhoods.

If planning policy is to be used as a solution, the implications of using such policy should be analysed and local requirements considered. Local authorities currently have powers to manage over-concentrations of A5 uses via development plans, and so a solution that enforces better adoption of these powers may be more effective in enabling a tailored resolution, accounting for local needs.

There is Limited or No Evidence that the Proposed Measure would be Effective:

We have seen limited or no evidence to demonstrate a causal link between the incidence of childhood obesity and proximity of hot food takeaway establishments to schools, thus the impact of the proposed policy on obesity levels, which has complex and multiple causes, is unclear.

We agree that causes of obesity are complex and a broad package of measures is required to reduce child obesity, however believe that proposed measures to address the issue that may result in change to high streets and possibly unintended economic and social impacts, should be based on evidence of effectiveness.

There appears to be limited or no evidence of a causal relationship. For example, a study by Fraser et al (2010) found positive correlation between density and higher deprivation, and between density and being overweight or obese. These relationships are also referenced in the draft London plan (paragraph 6.9.6). The study didn't however find an association between distance and obesity, despite measuring against this.

Public Health England report 'Obesity and the environment' (2014) outlines a lack of evidence that can demonstrate a causal link between actions and outcomes of food-choices of school children in and around school, however states some limited evidence of associations between obesity and fast food exist. Williams, J et al (2014) also found there was no strong evidence to justify policies related to regulating the food environments around schools, recognising inconsistencies across studies in definitions of "fast food outlets" and other key variables.

The impact of limiting the concentration of hot food takeaway establishments within an area can also lead to perhaps unexpected results. A study commissioned by the Independent to investigate the characteristics of an "obesogenic" environment split residential areas in Yorkshire into five types, based on the number of food outlets and opportunities for physical activity: saturated; moderate availability; low availability; moderate physical activity, limited food; and moderate physical activity, ample food. Analysis showed that of the 2 neighbourhood types associated (negatively and positively) with obesity, saturated neighbourhoods (with a high number of fast-food outlets, convenience stores, supermarkets, gyms and parks) had 14% lower risk of obesity whilst moderate-availability neighbourhoods were associated with an 18% higher risk of obesity. It was argued that those living in less saturated neighbourhoods would be more likely to drive to work and the shops and therefore undertake less physical activity.

Given that there is limited or no evidence regarding the effectiveness of imposing restrictions on A5 permissions in order to reduce child obesity levels, it is recommended that further study is undertaken so that an effective method, that can be adapted for local councils' needs, is undertaken.

Summary

We recognise that obesity is a major health challenge facing the capital and would like to propose that rather than enforcing policy that looks to restrict A5 permissions the food to go industry at large (including local independent and franchisee businesses like ours) work together with the government to improve the integrity of the whole food environment and consider alternative solutions to address the problem outlined in this representation.

If we can set an industry standard across multiple food formats, the collective benefits to London and society in general could be substantial. This would arguably have much greater success in reducing child obesity, without unintended economics and social consequences.

We believe that if we work together to evaluate other options, including the solutions proposed in this representation, we can develop the optimal solution for addressing the nation’s health.

User: Mainmoon Ltd (KFC Franchisee)

We understand child obesity is particular cause for concern and agree with any reasonable strategy that will be effective in tackling the issue, however are concerned that draft policy E9.C which seeks to restrict A5 ‘hot food takeaway’ permissions, may not be the most effective solution and may result in unintended implications. It may impact the growth of local businesses, including franchisees like ours, whilst allowing others (which sell a variety of foods, including snacks and takeaway options) to grow.

We would like to propose that rather than enforce policy that looks to restrict A5 consents, the government and food to go industry at large (including local independent and franchisee businesses like us) work together to improve the integrity of the food environment, which would arguably have much greater impact.
In this representation, we outline the concerns we have with the proposed policy to apply a zonal restriction to new A5 approvals and put forward some alternative solutions.

A Holistic, Lifestyle Approach is required to tackle Obesity, Involving Input from a Wide Variety of Stakeholders

Obesity has many complex, interrelated causes and requires a sophisticated and thoroughly considered approach to tackle the problem. We believe that rather than use planning policy to address the issue, it would be more effective for the industry to work together to devise a measure that tackles calorie reduction across all food and drink establishments.

Furthermore, we believe that more research is required to understand the impact of the whole food environment around schools and what the best solution may be. We understand our franchisor KFC (UK) Ltd would be prepared to invest in such a study, which would include a review of the effectiveness of implementing zonal A5 restrictions and any unintended impacts they have.

Some proposals that we suggest may be more effective in addressing the nation’s health include:

- All food establishments to sign up to a set of national standards, so that the whole food environment that children are exposed to is targeted
- Rather than apply a zonal restriction on A5 uses, it may be more appropriate to consider the density of hot food establishments locally within an area

- Ensure local authorities are fully supported in addressing key determinants of obesity, for example through providing facilities that encourage physical activity
- If a zonal restriction is to be adopted:
    - Only apply to secondary schools given primary school children would ordinarily be supervised by adults when going to/from school and are unable to leave during lunch breaks.
    - It should possibly apply to a zonal area where causality between hot food takeaways and obesity levels has been identified, however more research would be required to find evidence of causality before implementation.

We believe that if the government and food to go industry at large (including local independent and franchisee businesses like us) worked together to improve the integrity of the food environment, it would arguably have much greater success in reducing child obesity, without unintended implications, such as loss of jobs or investment.

We understand our franchisor brands are currently looking into ways in which they can improve the nutritional value of their offering and look forward to working with them on these initiatives.

A Zonal Restriction on A5 Permissions may not be the most Effective way to improve the Nation's Health

The Draft London Plan proposes placing a zonal restriction on A5 consents, however use class does not measure the nutritional value of food. Many food establishments have a takeaway option with children forming part of their customer base, but operate under a different use class to A5 and thus would not be impacted by the planning restrictions. Examples include bakeries, sandwich and baguette shops, coffee shops, burger and chicken 'eat in' restaurants with a takeaway facility, newsagents, supermarkets and convenience stores. These establishments sell a variety of foods, including snacks and treats.

Children come into contact with a range of food and drink establishments on their way to and from school and so it is unknown whether placing restrictions on A5 permissions within 400m of a school would have any impact on obesity levels. It may arguably be better to consider the density of hot food establishments within an area or require all food establishments to sign up to a set of national standards, so that the whole food environment that children are exposed to is targeted.

We should also consider that the policy applies to both primary and secondary schools, yet primary school children are ordinarily supervised going to/from school and cannot leave during lunch time. If a zonal restriction is to be applied, there may be merit in applying it only to secondary schools, so as to reduce unintended consequences without impacting effectiveness of the policy.

The Proposal may Impact the Growth of Local Businesses, including Independents, Franchisees and Eat-in Restaurants Expanding through Delivery Sales

Many hot food takeaways are independent or run by local franchisees and the proposed measure could significantly impact our businesses. We are looking to expand further across London and have identified restaurants for development in Old Street, Romford and South London. It is unknown whether the proposed measure will prevent us from future expansion across London boroughs, not only hindering our potential to grow, but also our ability to invest back into our business and continually improve our offering. Income from opening new restaurants can be used to enhance the in-store experience, pay better wages, create more jobs and test new initiatives, for example by trailing healthier options on our menus. If the proposed measure is implemented, it may discourage businesses like ours from investing in such initiatives, which would in turn act as a preventive measure towards the goal of improving the integrity of the whole food environment.

Should the proposal go ahead there would be few places for new hot food takeaways to open across London. There doesn’t appear to be suggestion that there is no requirement for hot food takeaways across the capital and so another solution could be to establish the optimum number that balances retail and public health. It may be useful for further research to be undertaken to determine what this optimum number looks like, a proposal we understand our franchisor KFC Ltd would be prepared to invest in.

We are a franchisee with 15 restaurants within London and employ c. 500 people within this area. We, like many other employers in the hot food takeaway sector are a key employer of young people and offer flexible work and excellent development opportunities. If the proposed policy were implemented, there is risk that future job opportunities offered by us and the wider sector from the opening of new restaurants would be impacted. Should areas outside of London also adopt such policy, the number of job opportunities affected could magnify. Revenues raised through business rates, employment taxes and section 106 payments should also be taken into account.

The proposed restriction on A5 permissions could result in a wider unforeseen impact on the convenience economy of food delivery, not only impacting independent & local franchisee businesses like ours but also eat-in restaurants looking to increase sales via home delivery. If they wish to expand through delivery sales, they may soon require A5 consents and may be restricted in obtaining these through the proposal.

Due to the forces of supply and demand, an increase in rents on A5 premises could also lead to more vacant premises on the high street and less competition. There is also risk that operators may be incentivised to delay selling sites until premiums have risen, initially reducing supply of property.

Further research on the implications of placing restrictions on A5 uses would be valuable, so that the wider economic and social influences and impact on the food and drink sector specifically are fully understood.

The Requirements for Food & Drink Establishments vary across Different Areas of London

The proposal to apply a blanket restriction on the granting of new A5 permissions within 400m of all primary and secondary schools within London should take into consideration the unique development requirements of different areas across London.

Some areas will have a wider food and drink offering than others, some will require greater levels of investment and job creation. The proposed policy to apply a uniform ban on hot food establishments may not take into account this disparity, preventing economic growth and high street regeneration in those areas that require it, whilst effecting customer choice.

We should also consider that affordable food and drink establishments can act as an important social hub for people who feel lonely and can act as a ‘safe space’ where people can socialise. This community requirement will be greater in different areas of London.

Our business has formed part of the rich tapestry of food offerings in London for 40 years and serves an important social role in communities. We hope that the new restaurants we plan to build would continue to add value to London neighbourhoods.

If planning policy is to be used as a solution, the implications of using such policy should be analysed and local requirements considered. Local authorities currently have powers to manage over-concentrations of A5 uses via development plans, and so a solution that enforces better adoption of these powers may be more effective in enabling a tailored resolution, accounting for local needs.

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We agree that causes of obesity are complex and a broad package of measures is required to reduce child obesity, however believe that proposed measures to address the issue that may result in change to high streets and possibly unintended economic and social impacts, should be based on evidence of effectiveness.

There appears to be limited or no evidence of a causal relationship. For example, a study by Fraser et al (2010) found positive correlation between density and higher deprivation, and between density and being overweight or obese. These relationships are also referenced in the draft London plan (paragraph 6.9.6). The study didn't however find an association between distance and obesity, despite measuring against this.

Public Health England report 'Obesity and the environment' (2014) outlines a lack of evidence that can demonstrate a causal link between actions and outcomes of food-choices of school children in and around school, however states some limited evidence of associations between obesity and fast food exist. Williams, J et al (2014) also found there was no strong evidence to justify policies related to regulating the food environments around schools, recognising inconsistencies across studies in definitions of "fast food outlets" and other key variables.

The impact of limiting the concentration of hot food takeaway establishments within an area can also lead to perhaps unexpected results. A study commissioned by the Independent to investigate the characteristics of an "obesogenic" environment split residential areas in Yorkshire into five types, based on the number of food outlets and opportunities for physical activity: saturated; moderate availability; low availability; moderate physical activity, limited food; and moderate physical activity, ample food. Analysis showed that of the 2 neighbourhood types associated (negatively and positively) with obesity, saturated neighbourhoods (with a high number of fast-food outlets, convenience stores, supermarkets, gyms and parks) had 14% lower risk of obesity whilst moderate-availability neighbourhoods were associated with an 18% higher risk of obesity. It was argued that those living in less saturated neighbourhoods would be more likely to drive to work and the shops and therefore undertake less physical activity.

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Summary

We recognise that obesity is a major health challenge facing the capital and would like to propose that rather than enforcing policy that looks to restrict A5 permissions the food to go industry at large (including local independent and franchisee businesses like ours) work together with the government to improve the integrity of the whole food environment and consider alternative solutions to address the problem outlined in this representation.

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We believe that if we work together to evaluate other options, including the solutions proposed in this representation, we can develop the optimal solution for addressing the nation’s health.

User: Ozland Ltd

We understand child obesity is particular cause for concern and agree with any reasonable strategy that will be effective in tackling the issue, however are concerned that draft policy E9.C which seeks to restrict A5 ‘hot food takeaway’ permissions, may not be the most effective solution and may result in unintended implications. It may impact the growth of local businesses, including franchisees like ours, whilst allowing others (which sell a variety of foods, including snacks and takeaway options) to grow.

We would like to propose that rather than enforce policy that looks to restrict A5 consents, the government and food to go industry at large (including local independent and franchisee businesses like us) work together to improve the integrity of the food environment, which would arguably have much greater impact.
In this representation, we outline the concerns we have with the proposed policy to apply a zonal restriction to new A5 approvals and put forward some alternative solutions.

A Holistic, Lifestyle Approach is required to tackle Obesity, Involving Input from a Wide Variety of Stakeholders

Obesity has many complex, interrelated causes and requires a sophisticated and thoroughly considered approach to tackle the problem. We believe that rather than use planning policy to address the issue, it would be more effective for the industry to work together to devise a measure that tackles calorie reduction across all food and drink establishments.

Furthermore, we believe that more research is required to understand the impact of the whole food environment around schools and what the best solution may be. We understand our franchisor KFC (UK) Ltd would be prepared to invest in such a study, which would include a review of the effectiveness of implementing zonal A5 restrictions and any unintended impacts they have.

Some proposals that we suggest may be more effective in addressing the nation’s health include:

- All food establishments to sign up to a set of national standards, so that the whole food environment that children are exposed to is targeted
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- Ensure local authorities are fully supported in addressing key determinants of obesity, for example through providing facilities that encourage physical activity
- If a zonal restriction is to be adopted:
    - Only apply to secondary schools given primary school children would ordinarily be supervised by adults when going to/from school and are unable to leave during lunch breaks.
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We believe that if the government and food to go industry at large (including local independent and franchisee businesses like us) worked together to improve the integrity of the food environment, it would arguably have much greater success in reducing child obesity, without unintended implications, such as loss of jobs or investment.

We understand our franchisor brands are currently looking into ways in which they can improve the nutritional value of their offering and look forward to working with them on these initiatives.

A Zonal Restriction on A5 Permissions may not be the most Effective way to improve the Nation's Health

The Draft London Plan proposes placing a zonal restriction on A5 consents, however use class does not measure the nutritional value of food. Many food establishments have a takeaway option with children forming part of their customer base, but operate under a different use class to A5 and thus would not be impacted by the planning restrictions. Examples include bakeries, sandwich and baguette shops, coffee shops, burger and chicken 'eat in' restaurants with a takeaway facility, newsagents, supermarkets and convenience stores. These establishments sell a variety of foods, including snacks and treats.

Children come into contact with a range of food and drink establishments on their way to and from school and so it is unknown whether placing restrictions on A5 permissions within 400m of a school would have any impact on obesity levels. It may arguably be better to consider the density of hot food establishments within an area or require all food establishments to sign up to a set of national standards, so that the whole food environment that children are exposed to is targeted.

We should also consider that the policy applies to both primary and secondary schools, yet primary school children are ordinarily supervised going to/from school and cannot leave during lunch time. If a zonal restriction is to be applied, there may be merit in applying it only to secondary schools, so as to reduce unintended consequences without impacting effectiveness of the policy.

The Proposal may Impact the Growth of Local Businesses, including Independents, Franchisees and Eat-in Restaurants Expanding through Delivery Sales

Many hot food takeaways are independent or run by local franchisees and the proposed measure could significantly impact our businesses. We are looking to expand further across London and have identified restaurants for development in Old Street, Romford and South London. It is unknown whether the proposed measure will prevent us from future expansion across London boroughs, not only hindering our potential to grow, but also our ability to invest back into our business and continually improve our offering. Income from opening new restaurants can be used to enhance the in-store experience, pay better wages, create more jobs and test new initiatives, for example by trailing healthier options on our menus. If the proposed measure is implemented, it may discourage businesses like ours from investing in such initiatives, which would in turn act as a preventive measure towards the goal of improving the integrity of the whole food environment.

Should the proposal go ahead there would be few places for new hot food takeaways to open across London. There doesn’t appear to be suggestion that there is no requirement for hot food takeaways across the capital and so another solution could be to establish the optimum number that balances retail and public health. It may be useful for further research to be undertaken to determine what this optimum number looks like, a proposal we understand our franchisor KFC Ltd would be prepared to invest in.

We are a franchisee with 15 restaurants within London and employ c. 500 people within this area. We, like many other employers in the hot food takeaway sector are a key employer of young people and offer flexible work and excellent development opportunities. If the proposed policy were implemented, there is risk that future job opportunities offered by us and the wider sector from the opening of new restaurants would be impacted. Should areas outside of London also adopt such policy, the number of job opportunities affected could magnify. Revenues raised through business rates, employment taxes and section 106 payments should also be taken into account.

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Summary

We recognise that obesity is a major health challenge facing the capital and would like to propose that rather than enforcing policy that looks to restrict A5 permissions the food to go industry at large (including local independent and franchisee businesses like ours) work together with the government to improve the integrity of the whole food environment and consider alternative solutions to address the problem outlined in this representation.

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We believe that if we work together to evaluate other options, including the solutions proposed in this representation, we can develop the optimal solution for addressing the nation’s health.

User:	London Borough of Harrow

Retail and hospitality benefit from services that increase footfall. Other services that should be encouraged would be libraries, health centres, recreation, and arts activities.

Harrow recognises the concern regarding A5 hot food takeaway uses and obesity. Paragraph (C) should be clarified with respect to the circumstances where a locally-determined boundary maybe justified (for example, where the location of hot food takeaway uses support the evening and night time economy).

User:	Royal Borough of Greenwich

E9C

Support the requirement that A5 hot food takeaway uses should not be permitted within 400m walking distance of existing or proposed schools.

User: Iceking Group

Our company, Iceking GROUP recognises that obesity is a major health challenge in London and that it is important that all related parties work together to develop a solution.

We understand child obesity is particular cause for concern and agree with any reasonable strategy that will be effective in tackling the issue, however are concerned that draft policy E9.C which seeks to restrict A5 ‘hot food takeaway’ permissions, may not be the most effective solution and may result in unintended implications. It may impact the growth of local businesses, including franchisees like ours, whilst allowing others (which sell a variety of foods, including snacks and takeaway options) to grow.

We would like to propose that rather than enforce policy that looks to restrict A5 consents, the government and food to go industry at large (including local independent and franchisee businesses like us) work together to improve the integrity of the food environment, which would arguably have much greater impact.

In this representation, we outline the concerns we have with the proposed policy to apply a zonal restriction to new A5 approvals and put forward some alternative solutions.

2. A Holistic, Lifestyle Approach is required to tackle Obesity, Involving Input from a Wide Variety of Stakeholders

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Furthermore, we believe that more research is required to understand the impact of the whole food environment around schools and what the best solution may be. We understand our franchisor KFC (UK) Ltd would be prepared to invest in such a study, which would include a review of the effectiveness of implementing zonal A5 restrictions and any unintended impacts they have.

Some proposals that we suggest may be more effective in addressing the nation's health include:

o All food establishments to sign up to a set of national standards, so that the whole food environment that children are exposed to is targeted
o Rather than apply a zonal restriction on A5 uses, it may be more appropriate to consider the density of hot food establishments locally within an area
o Ensure local authorities are fully supported in addressing key determinants of obesity, for example through providing facilities that encourage physical activity
o If a zonal restriction is to be adopted:
  o Only apply to secondary schools given primary school children would ordinarily be supervised by adults when going to/from school and are unable to leave during lunch breaks.
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We believe that if the government and food to go industry at large (including local independent and franchisee businesses like us) worked together to improve the integrity of the food environment, it would arguably have much greater success in reducing child obesity, without unintended social and economic implications, such as loss of jobs or investment.

We understand our franchisor brands are currently looking into ways in which they can improve the nutritional value of their offering and look forward to working with them on these initiatives.

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The Draft London Plan proposes placing a zonal restriction on A5 consents, however use class does not measure the nutritional value of food. Many food establishments have a takeaway option with children forming part of their customer base, but operate under a different use class to A5 and thus would not be impacted by the planning restrictions. Examples include bakeries, sandwich and baguette shops, coffee shops, burger and chicken ‘eat in’ restaurants with a takeaway facility, newsagents, supermarkets and convenience stores. These establishments sell a variety of foods, including snacks and treats.

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4. The Proposal may Impact the Growth of Local Businesses, including Independents, Franchisees and Eat-in Restaurants Expanding through Delivery Sales

Many hot food takeaways are independent or run by local franchisees and the proposed measure could significantly impact our businesses.

We are looking to expand and have found 3 potential new restaurants within London. The proposed measure is likely to prevent us from being able to expand in areas such as these across London, not only hindering our potential to grow, but also our ability to invest back into our business and continually improve our offering. Income from opening new restaurants can be used to enhance the in-store experience, pay better wages, create more jobs and test new initiatives, for example by trailing healthier options on our menus. If the proposed measure is implemented, it may discourage businesses like ours from investing in such initiatives, which would in turn act as a preventive measure towards the goal of improving the integrity of the whole food environment.

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We are a franchisee with 5 restaurants within London and employ 200 people within this area. If we were to expand through the sites we have targeted for development and continue to grow within London, these numbers could increase significantly. We, like many other employers in the hot food takeaway sector are a key employer of young people and offer flexible work and excellent development opportunities. If the proposed policy were implemented, there is risk that future job opportunities offered by us and the wider sector from the opening of new restaurants would be impacted. Should areas outside of London also adopt such policy, the number of job opportunities affected could magnify. Revenues raised through business rates, employment taxes and section 106 payments should also be taken into account.

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We should also consider that affordable food and drink establishments can act as an important social hub for people who feel lonely and can act as a ‘safe space’ where people can socialise. This community requirement will be greater in different areas of London.

Our business has formed part of the rich tapestry of food offerings in London for 18 years and serves an important social role in communities. We hope that the new restaurants we plan to build would continue to add value to London neighbourhoods.

If planning policy is to be used as a solution, the implications of using such policy should be analysed and local requirements considered. Local authorities currently have powers to manage over-concentrations of A5 uses via development plans, and so a solution that enforces better adoption of these powers may be more effective in enabling a tailored resolution, accounting for local needs.

6. There is Limited or No Evidence that the Proposed Measure would be Effective:

We have seen limited or no evidence to demonstrate a causal link between the incidence of childhood obesity and proximity of hot food takeaway establishments to schools, thus the impact of the proposed policy on obesity levels, which has complex and multiple causes, is unclear.

We agree that causes of obesity are complex and a broad package of measures is required to reduce child obesity, however believe that proposed measures to address the issue that may result in change to high streets and possibly unintended economic and social impacts, should be based on evidence of effectiveness.

There appears to be limited or no evidence of a causal relationship. For example, a study by Fraser et al (2010) found positive correlation between density and higher deprivation, and between density and being overweight or obese. These relationships are also referenced in the draft London plan (paragraph 6.9.6). The study didn’t however find an association between distance and obesity, despite measuring against this.

Public Health England report ‘Obesity and the environment’ (2014) outlines a lack of evidence that can demonstrate a causal link between actions and outcomes of food-choices of school children in and around school, however states some limited evidence of associations between obesity and fast food exist. Williams, J et al (2014) also found there was no strong evidence to justify policies related to regulating the food environments around schools, recognising inconsistencies across studies in definitions of “fast food outlets” and other key variables.

The impact of limiting the concentration of hot food takeaway establishments within an area can also lead to perhaps unexpected results. A study commissioned by the Independent to investigate the characteristics of an “obesogenic” environment split residential areas in Yorkshire into five types, based on the number of food outlets and opportunities for physical activity: saturated; moderate availability; low availability; moderate physical activity, limited food; and moderate physical activity, ample food. Analysis showed that of the 2 neighbourhood types associated (negatively and positively) with obesity, saturated neighbourhoods (with a high number of fastfood outlets, convenience stores, supermarkets, gyms and parks) had 14% lower risk of obesity whilst moderate-availability neighbourhoods were associated with an 18% higher risk of obesity. It was argued that those living in less saturated neighbourhoods would be more likely to drive to work and the shops and therefore undertake less physical activity.

Given that there is limited or no evidence regarding the effectiveness of imposing restrictions on A5 permissions in order to reduce child obesity levels, it is recommended that further study is undertaken so that an effective method, that can be adapted for local councils’ needs, is undertaken.

7. Summary

We recognise that obesity is a major health challenge facing the capital and would like to propose that rather than enforcing policy that looks to restrict A5 permissions the food to go industry at large (including local independent and franchisee businesses like ours) work together with the government to improve the integrity of the whole food environment and consider alternative solutions to address the problem outlined in this representation.

If we can set an industry standard across multiple food formats, the collective benefits to London and society in general could be substantial. This would arguably have much greater success in reducing child obesity, without unintended economics and social consequences.

We believe that if we work together to evaluate other options, including the solutions proposed in this representation, we can develop the optimal solution for addressing the nation's health.

8. References

Fraser, L. K., and Edwards, K. L., (2010. 'The association between the geography of fast food outlets and childhood obesity rates in Leeds', Health & Place, 16, (6)

Hobbs, M. (2018). Obesity is linked to where you Live – Would Regulating Fast Food Outlets Change this? Independent, [online] Available at: http://www.independent.co.uk/life-style/health-andfamilies/features/fast-food-obesity-health-link-weight-regulation-a8134941.html

Public Health England (2014). Obesity and the environment: regulating the growth of fast food outlets. Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/296248/Obesity_and_environment_March2014.pdf

Williams, J. Scarborough, P. Matthews, A. Cowburn, G. Foster, C. Roberts, N. Rayner, M. (2014). A systematic review of the influence of the retail food environment around schools on obesityrelated outcomes, Obesity Reviews

User:	London Borough of Enfield

Policy E9 ‘Retail markets and hot food takeaways’ is too controlling. Comparison and convenience goods retailing capacity should be brought forward to town centres through Local Plans in line with local evidence. Boroughs should be in charge of their retail provision. Policy is too simplistic regarding the provision of small shops and affordable units, this should be locally defined.

User: Auriga Holdings

We understand child obesity is particular cause for concern and agree with any reasonable strategy that will be effective in tackling the issue, however are concerned that draft policy E9.C which seeks to restrict A5 ‘hot food takeaway’ permissions, may not be the most effective solution and may result in unintended implications. It may impact the growth of local businesses, including franchisees like ours, whilst allowing others (which sell a variety of foods, including snacks and takeaway options) to grow.

We would like to propose that rather than enforce policy that looks to restrict A5 consents, the government and food to go industry at large (including local independent and franchisee businesses like us) work together to improve the integrity of the food environment, which would arguably have much greater impact.
In this representation, we outline the concerns we have with the proposed policy to apply a zonal restriction to new A5 approvals and put forward some alternative solutions.

A Holistic, Lifestyle Approach is required to tackle Obesity, Involving Input from a Wide Variety of Stakeholders

Obesity has many complex, interrelated causes and requires a sophisticated and thoroughly considered approach to tackle the problem. We believe that rather than use planning policy to address the issue, it would be more effective for the industry to work together to devise a measure that tackles calorie reduction across all food and drink establishments.

Furthermore, we believe that more research is required to understand the impact of the whole food environment around schools and what the best solution may be. We understand our franchisor KFC (UK) Ltd would be prepared to invest in such a study, which would include a review of the effectiveness of implementing zonal A5 restrictions and any unintended impacts they have.

Some proposals that we suggest may be more effective in addressing the nation’s health include:

- All food establishments to sign up to a set of national standards, so that the whole food environment that children are exposed to is targeted
- Rather than apply a zonal restriction on A5 uses, it may be more appropriate to consider the density of hot food establishments locally within an area

- Ensure local authorities are fully supported in addressing key determinants of obesity, for example through providing facilities that encourage physical activity
- If a zonal restriction is to be adopted:
    - Only apply to secondary schools given primary school children would ordinarily be supervised by adults when going to/from school and are unable to leave during lunch breaks.
    - It should possibly apply to a zonal area where causality between hot food takeaways and obesity levels has been identified, however more research would be required to find evidence of causality before implementation.

We believe that if the government and food to go industry at large (including local independent and franchisee businesses like us) worked together to improve the integrity of the food environment, it would arguably have much greater success in reducing child obesity, without unintended implications, such as loss of jobs or investment.

We understand our franchisor brands are currently looking into ways in which they can improve the nutritional value of their offering and look forward to working with them on these initiatives.

A Zonal Restriction on A5 Permissions may not be the most Effective way to improve the Nation's Health

The Draft London Plan proposes placing a zonal restriction on A5 consents, however use class does not measure the nutritional value of food. Many food establishments have a takeaway option with children forming part of their customer base, but operate under a different use class to A5 and thus would not be impacted by the planning restrictions. Examples include bakeries, sandwich and baguette shops, coffee shops, burger and chicken 'eat in' restaurants with a takeaway facility, newsagents, supermarkets and convenience stores. These establishments sell a variety of foods, including snacks and treats.

Children come into contact with a range of food and drink establishments on their way to and from school and so it is unknown whether placing restrictions on A5 permissions within 400m of a school would have any impact on obesity levels. It may arguably be better to consider the density of hot food establishments within an area or require all food establishments to sign up to a set of national standards, so that the whole food environment that children are exposed to is targeted.

We should also consider that the policy applies to both primary and secondary schools, yet primary school children are ordinarily supervised going to/from school and cannot leave during lunch time. If a zonal restriction is to be applied, there may be merit in applying it only to secondary schools, so as to reduce unintended consequences without impacting effectiveness of the policy.

The Proposal may Impact the Growth of Local Businesses, including Independents, Franchisees and Eat-in Restaurants Expanding through Delivery Sales

Many hot food takeaways are independent or run by local franchisees and the proposed measure could significantly impact our businesses. We are looking to expand further across London and have identified restaurants for development in Old Street, Romford and South London. It is unknown whether the proposed measure will prevent us from future expansion across London boroughs, not only hindering our potential to grow, but also our ability to invest back into our business and continually improve our offering. Income from opening new restaurants can be used to enhance the in-store experience, pay better wages, create more jobs and test new initiatives, for example by trailing healthier options on our menus. If the proposed measure is implemented, it may discourage businesses like ours from investing in such initiatives, which would in turn act as a preventive measure towards the goal of improving the integrity of the whole food environment.

Should the proposal go ahead there would be few places for new hot food takeaways to open across London. There doesn’t appear to be suggestion that there is no requirement for hot food takeaways across the capital and so another solution could be to establish the optimum number that balances retail and public health. It may be useful for further research to be undertaken to determine what this optimum number looks like, a proposal we understand our franchisor KFC Ltd would be prepared to invest in.

We are a franchisee with 15 restaurants within London and employ c. 500 people within this area. We, like many other employers in the hot food takeaway sector are a key employer of young people and offer flexible work and excellent development opportunities. If the proposed policy were implemented, there is risk that future job opportunities offered by us and the wider sector from the opening of new restaurants would be impacted. Should areas outside of London also adopt such policy, the number of job opportunities affected could magnify. Revenues raised through business rates, employment taxes and section 106 payments should also be taken into account.

The proposed restriction on A5 permissions could result in a wider unforeseen impact on the convenience economy of food delivery, not only impacting independent & local franchisee businesses like ours but also eat-in restaurants looking to increase sales via home delivery. If they wish to expand through delivery sales, they may soon require A5 consents and may be restricted in obtaining these through the proposal.

Due to the forces of supply and demand, an increase in rents on A5 premises could also lead to more vacant premises on the high street and less competition. There is also risk that operators may be incentivised to delay selling sites until premiums have risen, initially reducing supply of property.

Further research on the implications of placing restrictions on A5 uses would be valuable, so that the wider economic and social influences and impact on the food and drink sector specifically are fully understood.

The Requirements for Food & Drink Establishments vary across Different Areas of London

The proposal to apply a blanket restriction on the granting of new A5 permissions within 400m of all primary and secondary schools within London should take into consideration the unique development requirements of different areas across London.

Some areas will have a wider food and drink offering than others, some will require greater levels of investment and job creation. The proposed policy to apply a uniform ban on hot food establishments may not take into account this disparity, preventing economic growth and high street regeneration in those areas that require it, whilst effecting customer choice.

We should also consider that affordable food and drink establishments can act as an important social hub for people who feel lonely and can act as a ‘safe space’ where people can socialise. This community requirement will be greater in different areas of London.

Our business has formed part of the rich tapestry of food offerings in London for 40 years and serves an important social role in communities. We hope that the new restaurants we plan to build would continue to add value to London neighbourhoods.

If planning policy is to be used as a solution, the implications of using such policy should be analysed and local requirements considered. Local authorities currently have powers to manage over-concentrations of A5 uses via development plans, and so a solution that enforces better adoption of these powers may be more effective in enabling a tailored resolution, accounting for local needs.

There is Limited or No Evidence that the Proposed Measure would be Effective:

We have seen limited or no evidence to demonstrate a causal link between the incidence of childhood obesity and proximity of hot food takeaway establishments to schools, thus the impact of the proposed policy on obesity levels, which has complex and multiple causes, is unclear.

We agree that causes of obesity are complex and a broad package of measures is required to reduce child obesity, however believe that proposed measures to address the issue that may result in change to high streets and possibly unintended economic and social impacts, should be based on evidence of effectiveness.

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The impact of limiting the concentration of hot food takeaway establishments within an area can also lead to perhaps unexpected results. A study commissioned by the Independent to investigate the characteristics of an "obesogenic" environment split residential areas in Yorkshire into five types, based on the number of food outlets and opportunities for physical activity: saturated; moderate availability; low availability; moderate physical activity, limited food; and moderate physical activity, ample food. Analysis showed that of the 2 neighbourhood types associated (negatively and positively) with obesity, saturated neighbourhoods (with a high number of fast-food outlets, convenience stores, supermarkets, gyms and parks) had 14% lower risk of obesity whilst moderate-availability neighbourhoods were associated with an 18% higher risk of obesity. It was argued that those living in less saturated neighbourhoods would be more likely to drive to work and the shops and therefore undertake less physical activity.

Given that there is limited or no evidence regarding the effectiveness of imposing restrictions on A5 permissions in order to reduce child obesity levels, it is recommended that further study is undertaken so that an effective method, that can be adapted for local councils' needs, is undertaken.

Summary

We recognise that obesity is a major health challenge facing the capital and would like to propose that rather than enforcing policy that looks to restrict A5 permissions the food to go industry at large (including local independent and franchisee businesses like ours) work together with the government to improve the integrity of the whole food environment and consider alternative solutions to address the problem outlined in this representation.

If we can set an industry standard across multiple food formats, the collective benefits to London and society in general could be substantial. This would arguably have much greater success in reducing child obesity, without unintended economics and social consequences.

We believe that if we work together to evaluate other options, including the solutions proposed in this representation, we can develop the optimal solution for addressing the nation’s health.

User: London First

Policy E9: Retail, markets and hot food takeaways
Whilst we support the intent of part C and D of this policy to seek to improve the health of Londoners, this policy is not practical, reasonable or enforceable (part D) and does not address its own aims. Restricting additional hot food takeaways will not remove potential sources of unhealthy food from schoolchildren: unhealthy food – either hot or cold – is readily available in convenience or retail stores. This policy is also overly prescriptive for a strategic policy.

We do not agree with part E of this policy that encourages developments over 2,500 sq.m of retail floorspace to include the provision of small and affordable retail units where there is evidence of local need. There is no evidence base to support this policy requirement. Similar to our response to policy E3 on affordable workspace, the policy requirement could unfairly disadvantage some businesses within the town centre compared to others by subsidising rents.

User:	London Borough of Enfield - Public Health

The restriction on A5 hot food takeaways is welcome. However, legislation needs to be revised to ensure that premises bought under one use are not subsequently changed to A5 usage. This is particularly important given the Mayors statutory duty to promote health and prevalence of both adult and childhood obesity in London.

User: Mama Ujuaje

London Plan Policy E9, C and D should read:

C. Development proposals containing A5 hot food takeaway uses should not be

permitted where these are within 400 metres walking distance of an existing or proposed primary or secondary school. Boroughs that wish to set a locally-determined boundary from schools must ensure this is sufficiently justified. Boroughs should also consider whether it is appropriate to manage an over-concentration of A5 hot food takeaway uses within Local, District and other town centres through the use of locally-defined thresholds in Development Plans.

D. Where development proposals involving A5 hot food takeaway uses are permitted,these should be conditioned to require the operator to achieve, and operate in compliance with, the Healthier Catering Commitment standard.

6.9.6 Obesity is one of the greatest health challenges facing the capital. In London 38 per cent of Year 6 pupils (10 to 11 year-olds) are overweight or obese – higher than any other region in England. Children living in the most deprived areas of London are twice as likely to be obese as children living in the least deprived areas[93]. The creation of a healthy food environment, including access to fresh food, is therefore important. The number of hot food takeaways in London has been steadily rising, with London boroughs having some of the highest densities of hot food takeaways in England. More deprived areas commonly have a higher density of hot food takeaways than other areas[94].

[93] From Evidence into Action: Opportunities to Protect and Improve the Nation's Health. Public Health England, Oct. 2014.
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/366852/PHE_Priorities.pdf
[94] Public Health England (2016) Fast Food Map
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/578041/Fast_food_map_2016.pdf

6.9.7 Hot food takeaways generally sell food that is high in calories, fat, salt and sugar, and low in fibre, fruit and vegetables. There is evidence that regular consumption of energy-dense food from hot food takeaways is associated with weight gain, and that takeaway food is appealing to children. It is recognised that the causes of obesity are complex and the result of a number of factors, and that a broad package of measures is required to reduce childhood obesity within London. A wide range of health experts recommend restricting the proliferation of hot food takeaways, particularly around schools, in order to help create a healthier food environment. Shift and night-time workers also find it particularly difficult to access healthy food due to the limited options available to them at night time.

Sustain Response to this policy

We welcome the ban on new fast food takeaway outlets within 400m of school. We would like to see this extended to include a ban on outdoor advertising of unhealthy food and sugary drinks (legal High Fat Sugar and Salt (HFSS) definition used by Ofcom), especially on public transport routes used by school children; or a levy on such advertising hypothecated to pay for children's health promotion.

London has a serious challenge in addressing obesity and other diet-related conditions such as diabetes. Schools represent symbolic areas and should be healthy food zones. Proliferation of fast food outlets and highly processed food undermines good work being done by London schools to improve the food environment for children. There is a duty of care to take action on their everyday food environment.

There are many questions to be raised around the way in which the Policy E9 has been phrased and the fact of its articulation around Hot food takeaways and Sustain's response to this.

What, for example, is the response of food growing networks and the larger Food Systems of the UK to the proposed closure of 'chicken shops', used here in lieu of 'hot food takeaways', but recognising that the meaning is probably also applied to kebab shops, fish and chip shops, Chinese, Indian, African and Caribbean take-aways. Who owns the narrative discourse around this policy move?

It is noted that the media have immediately seized upon the nomenclature of 'chicken shops' and informal discussions have mostly focussed upon these kinds of outlets, but we note that many of the A5 license hot food takeaways are primarily owned by those of visible ethnic difference and so are easy to target. We also note the absence of consideration of larger outlets which may well contribute to childhood obesity and diabetes as well as form a basis of night time and support service worker source of food.

Are those articulating and responding to this policy looking at the entire food system in which such shops sit: the supply chains, the alternative employment possibilities, the impact on where the ‘school pound’ is spent? Are they also looking at the local economies, relationships between the different social infrastructural relationships, especially from a local community perspective? What might be the social/integrated impact assessment of a called for closure of ‘chicken shops’ in a locality, especially one in which the local community members were involved as well as other private/corporate agencies which are engaged in the food supply system for school children in such a locality?

Further narrative:

Chicken shops and other fast food outlets in London have evolved partly in response to a number of factors which come together to determine choice: the standard of school dinners, corporate advertising and the expressed desires of school children under a range of circumstances to purchase a gratifying, calorie laden, ‘attractive’ alternative to uninspiring food offered at schools or at home.
There are other considerations: for some children this may represent not only a lunchtime alternative, but also an after school (or even breakfast) meal in households where there may be few low cost alternatives.

In an atmosphere with high levels of corporate advertising to school children and young adults, there has also developed a culture of indifference to food quality on a nutritional level but innovators like the ‘Chicken Connoisseur’ have identified a gap in the market of ‘food style-ism’, a kind of working class alternative to rampant and inaccessible ‘foodism’ which pervades corporate TV and other media (and which remains beyond the pale of criticism although contributing to practices of corporate exploitation of a wide range of tropical food and farming systems and highly appropriative and not always ‘healthy’).

The uptake of ‘chicken shop’ provisions cannot be viewed in isolation from child food poverty statistics, which of course relate to discussions on family poverty, regional deprivation, closure of traditional markets, access to good, cultural foods by working class families and of course, not to be overlooked are traditions of good food even where there is poverty because of food practices which value sound offerings of wholesome vegetarian and vegan food, as a tradition.
https://www.nationalgeographic.com/people-and-culture/food/the-plate/2016/07/for-rastas--eating-from-the-earth-is-a-sacred-duty/

Such foods might include offerings from African, Caribbean and South Asian communities, despite the stereotypes applied to these communities by mass media and corporate advertising. Even the research is contradictory:
http://shura.shu.ac.uk/12926/3/Healthy%20eating%20and%20minority%20ethnic%20households%20final.pdf
A question is to be asked as to the level of racial stereotyping that takes place to further disadvantage lower income families and whilst 'chicken shop' owners might be complicit in this behaviour, they are probably nomore so than the innovators behind, for example, supermarket offerings of cooked, hot food, which is often predominantly chicken based and for whom the queues are not made up of school children, but often well heeled and white adults!

A further question needs to be asked of the alternatives under discussion: What are the alternatives should many of these fast food outlets disappear? Will the children be driven to source food from supermarket 'local' shops? What innovation could community food providers come up with and what are the barriers and opportunities to this possibility? How many ethnic minorities are involved in food growing in the city? How are they able to access land for food growing and what are their needs for initiating and maintaining food hubs to cater for their communities?

What of the food outlets themselves? Many are chain food suppliers, so perhaps operate on a similar degree of scale to other large fast food outlets. However, are the even larger chains being similarly penalised? Are certain well known big brand fast food outlets to be also targeted, if they are within the target zones? Have they a greater capacity to relocate, due to economies of scale?

How many of the 'chicken shop' outlets are small scale single owner outlets and how will their own economies fare under this directive? What might be the links between these outlets and small scale local grocers or multipurpose corner shops which enable local low income families to purchase essential foodstuffs and green groceries?

Often the inefficiencies in the welfare benefit system and the location patterns of larger outlets mean that such small scale provisions make the difference between the ability to purchase foodstuffs and the existence of near food desert conditions.

Many of the above issues may not occur to those who live even slightly more privileged life styles and for whom there are more options beyond the scale of where they live (hence implying issues of transport in the London Plan and the fact that many more households in Britain are spending more of their household income on transport than ever before, especially families without children).

If an analysis were to be done of the areas in which ‘chicken shops’ appear at a greater density, compared with the middle class/higher income alternatives such as the various niche delicatessens, bakeries, patisseries, charcuteries, tobacconists and wine sellers, can a similar argument be made in relation to their contribution to poor health outcomes of their main users, or is there no focus on the lifestyle and health practices of privileged groups in the London Plan?

There are many other considerations, but suffice it to say for the sake of relative brevity, critically, there is a need for carefully controlled integrated impact assessments to be carried out with full community involvement before this aspect of the London Plan, which has been uncritically acclaimed by many - on the single measures of childhood obesity and diabetes - without looking further at the implications and opportunities this has for the affected communities and for the development of more comprehensive and inclusive lifetime neighbourhoods respectively..

User:	Kentucky Fried Chicken (KFC)
Full response - see attached.	

User: Just Space

Policy E9 Retail, markets and hot food takeaways

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

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

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

If an analysis were to be done of the areas in which 'hot food takeaways' appear at a greater density, compared with the middle class/higher income alternatives such as delicatessens and bakeries and patisseries, charcuteries, tobacconists and wine sellers, it would be fair to make a similar argument in relation to their contribution to poor health outcomes of their main users; but there seems to be no focus on the lifestyle and health practices of privileged groups in the London Plan.

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

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

Proposed changes

Add new points:

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

Point C – delete

Point D – Where development proposals involving A5 hot food takeaway uses are permitted, the operator should be supported to achieve, and operate in compliance with, the Healthier Catering Commitment standard through working in collaboration with the GLA, London Food Board, local authority and other stakeholders.

User:	TUC London, South East and East of England

Policy E9: Retail and markets

1. It is important to protect and improve London’s wholesale markets.
2. High quality street markets add to cohesive and vibrant communities, town centres and London’s offer to tourists. They need to be protected and improved. Some markets do not have a solid legal basis, such as East Street Market in Southwark. And some markets have fallen into disrepair, East street Market again is a good example of this.

User:	London Borough of Bexley

With regard to **Part E** of **Policy E9 Retail, markets and hot food takeaways**, Bexley already has a large number of small units in its town centres and previous retail studies have shown the need for larger units to encourage more retailers into the town centre. This policy does not allow for local specificity. Vacancy rate surveys show that the majority of vacancies in Bexley's town centres are in smaller units. **Part E** should therefore be amended to allow for local circumstances.

With regard to **Part F** of **Policy E9**, if the surplus retail space is out of centre it conflicts with **Part B(8)** of **Policy E9**, which encourages out-of-centre retail to be developed for housing. **Part F** therefore should be amended to include '*within town centres*' when considering ground floor uses when surplus retail space is redeveloped.

User:	Federation of Small Businesses

7) Markets in the capital are facing many challenges – notably Berwick Street Market - as a result of development plans in the area. Markets are vital to London’s heritage and culture and must not be afterthought in development plans.

User:	Federation of Small Businesses

This measure needs to be impressed upon large developers. Having anchor tenants in a property might seem like a good solution, however, more often than not, these large chains are running at a loss and purely using the site as a branding opportunity. Smaller businesses provide character, a solid and stable return to an investor and local jobs.

User: London Healthier Places

The LHP Network strongly supports part C of Policy E9 on hot food takeaways. Tackling obesity is one of the key health priorities for London, that has the highest childhood obesity rates nationally.

Being overweight or obese in childhood and adolescence has considerable consequences for physical and psychological health and academic achievement. Some obesity-related conditions can develop during childhood. Type 2 diabetes (a condition that normally develops in adulthood) in overweight children has increased, as have asthma and other respiratory problems, along with some musculoskeletal disorders. Furthermore, the emotional and psychological effects of being overweight include discrimination and teasing by peers; low self-esteem, anxiety and depression, potentially impacting educational performance and wellbeing. Obese children may also suffer disturbed sleep and fatigue, impacting quality of life.

The obesogenic environment in which London children live, learn and play influence their behaviour and decisions. Over the course of the last decade, many national and international studies have shown moderate to strong associations between density and location of fast food and takeaway outlets and take away consumption and excess weight. A cross-sectional study in England found a positive association between the density of unhealthy food outlets in a given neighbourhood, including fast food, and the prevalence of overweight and obesity in children1

The LHP Network strongly supports the 400m exclusion zone around both primary and secondary schools, and the requirement for new hot food takeaways to comply with the Healthier Catering Commitment standards. Appropriate measures to prevent over-concentration of A5 uses should also be implemented.

User: Organiclea

7: FOOD HUBS

Food production hubs can play a useful role within the city. These might be integrated light industrial developments which involve food growing, local food processing and markets based upon these which provide alternative food systems not subject to the whims of large industry. Food hubs can act as a distribution point for small-scale agroecological producers, provide opportunities for SMEs and start-ups, provide good food for all, act as community centres, and provide education, training and jobs. Even imported foodstuffs obtained from regional wholesale centres can be processed in these food hubs. Food hubs can provide social spaces as well as job opportunities which are connected to a range of cultural understandings of what a lifetime neighbourhood means in practice.

The promise of community food hubs has been highlighted in reports such as “Community Food Hubs: Helping make Edinburgh a Sustainable Food City” by The University of Edinburgh and “Good planning for good food: How the planning system in England can support healthy and sustainable food” by Sustain. Food hubs are being promoted in other cities. It is vital that these initiatives are supported through the planning system in London.

In relation to E9.B:

We suggest the addition of a 10th pt:

In Development Plans, boroughs must 10) support the establishment and continued existence of community food hubs as sites which combine spaces for the growing, preparation and eating of healthy foods in an inclusive environment alongside distribution points for small-scale agroecological community produced food.

We feel this needs designing into the sections on health and social care facilties (S2), education and childcare facilities (S3), sports and recreation facilities (S5) and suggest the following policies:

In development plans and in planning decisions, boroughs must:

1. **Encourage the start-up of food hubs which are located in Town Centres which work in partnership with schools and colleges to encourage food based businesses by offering training skills in food growing, marketing and distribution as well as environmental management, managing food waste, and addressing food poverty, providing a variety of skills to encourage localised, self-reliant development within each borough, but also facilitating advantageous cross borough connections which can benefit London as a whole and households across each region.**
2. **Develop strategic partnerships between public health initiatives, community food hubs and social prescribing to optimise benefit to local communities in terms of well-being, improved mental health and social enterprise.**

We believe that this is essential to the London Plan's over-arching good growth principles as amended by CFGN and Just Space: GG1 (Building strong and inclusive communities), GG2 (Making the best use of land), GG3 (Creating a healthy city), GG5 (Growing a good economy), GG6 (Increasing efficiency and resilience).

8: LONDON'S MARKETS

London's markets are a remarkable source of healthy and cheap food and other goods, serve a social benefit, support independent business, provide local employment and an opportunity for start-up businesses.

We support a strengthening of E9.B.7 to:

In development plans, boroughs **must**: 7) support **and protect** the range of London’s markets, including street markets, covered markets, specialist and farmers’ markets, complementing other measures to improve their management, enhance their offer and contribute to the vitality of town centres and the Central Activities Zone.

We support the strengthening of this policy with the additions that:

- **Local authorities must seek to retain control of management and rent-setting and must consult with traders and customers on future proposals.**
- **The London Plan must include a database of protected markets.**
- **Boroughs must specifically seek to protect clusters of small and independent businesses and ethnic and migrant traders which have a unique and irreplaceable character.**

User: Organiclea

9: SOCIAL AND ENVIRONMENTAL IMPACTS OF RETAIL

The social and environmental impact of the food we eat in London is huge, extending across the globe as well as on to dinner tables across London. The poor labour and environmental practices of certain forms of retail are well documented. The planning system must be used to take this into account and to support more sustainable and just forms of retail as supported by Sustain's research “Good planning for good food: How the planning system in England can support healthy and sustainable food”

We propose an additional 11th pt in relation to E9.B:

In Development Plans, boroughs must

11) base planning decisions related to food retail on thorough upstream and downstream environmental and social impact assessments which examine the impact of food retail both downstream on citizen access for all to culturally-appropriate and nutritious foods and upstream on the environmental and social (including labour practices) impacts of different retail routes.

We believe that this is essential to the London Plan's over-arching good growth principles as amended by CFGN and Just Space: GG1 (Building strong and inclusive communities), GG2 (Making the best use of land), GG3 (Creating a healthy city), GG5 (Growing a good economy), GG6 (Increasing efficiency and resilience).

User:	Rosalind Readhead

POLICY 4.8.e I support the range of London’s markets, including street, farmers’ and, where relevant, strategic markets, complementing other measures to improve their management, enhance their offer and contribute to the vitality of town centres. This must be broadened to develop the relationship between Londoners and the local food growers outside London. Helping with picking and building cultural exchanges.This is important for food security, health and well being.

User: NHS England

London’s prevention partnership, which includes NHS England and our partner agencies, is particularly supportive of the policy in the plan that prevents new hot food takeaways opening within 400 metres walking distance of an existing or proposed primary or secondary school (policy E9, page 257, chapter 6).

We care about this because the NHS costs attributable to overweight and obesity are projected to reach £9.7 billion by 2050 (UK-wide) with the associated costs to society estimated to reach £49.9 billion every year. London has the highest rate of obesity in 10-11 year olds in England (23%) and, although there are some signs of improvement, the primary driver for obesity in children remains the increasing consumption of high sugar and fatty foods. The number of fast food retail outlets in London is increasing with the annual rate now at 10% and there is a high proportion of chicken shops in more deprived areas. Fried chicken shops are the new staple of London’s high streets. An example of this is in the London Borough of Newham, one of the most deprived boroughs in the capital, which has over 258 hot food takeaway outlets; of which over a quarter are fried chicken shops.

Finally, 2.1 million Londoners talked to us through the ‘Great Weight Debate’ and our findings identified access to healthy affordable food as a top priority for Londoners too.

In addition to supporting the commitments outlined in the plan, we know from ‘Obesity and the environment: regulating the growth of fast food outlets’ (2014) that most ‘authorities have used a distance of 400m to define the boundaries of their fast food exclusion zone, as this is thought to equate to a walking time of approximately five minutes. However, in Brighton and Hove this was found to be inadequate to cover the areas actually used by pupils: an 800m radius is used as it covers significantly more lunchtime journeys’. We would welcome exploring with the Mayor and partners in health and local authorities whether we could be more ambitious in the London Plan commitment for the benefit of Londoners and their health.3

3 A more detailed response to Policy E9 can be found in Appendix 1

Appendix 1 – Detailed response to Policy E9

The findings from an independent evaluation of The Great Weight Debate helped inform the draft London plan.
Nine out of ten of more than 2,500 Londoners who responded to the Great Weight Debate survey said tackling London's childhood obesity epidemic should be either the top or a high priority for the capital.

Londoners were asked to list the top three things that they thought made it harder for children to live healthy lives in their area, with 60% ticking 'too many unhealthy food and drink options', 44% ticking 'too many fast food shops' and 33% ticking 'safety concerns for children (not letting them play outdoors unsupervised)'.

Cheaper healthy food and drink, support for families to cook healthier food, limits on the number of fast food shops and less marketing and advertising of high fat and surgery food and drink were the top four factors that Londoners felt would support children in the capital to lead healthier lives.

The UK-wide NHS costs attributable to overweight and obesity are projected to reach £9.7 billion by 2050, with wider costs to society estimated to reach £49.9 billion per year.
London has more seriously overweight children than New York, Sydney, Paris or Madrid. The capital also has more obese children than anywhere else in England. More than a third are overweight or obese by the time they leave primary school.

The primary driver for obesity in children is the increasing consumption of high sugar and fatty foods.

The number of fast food retail outlets in London continues to increase and the annual rate increase is now 10% with a high proportion of chicken shops in more deprived areas.
Fried chicken shops are the new staple of London's high streets. For example the London Borough of Newham, one of the three most deprived boroughs in London, has over 258 hot food takeaway outlets, of which 28% are fried chicken shops.

Being overweight or obese puts children at increased risk of a range of health problems, including high cholesterol, high blood pressure, pre-diabetes, bone and joint problems and breathing difficulties. It can also affect a child's mental well-being, lead to low self-esteem and absence from school. Children who are obese are also much more likely to become obese in adulthood.

The Great Weight Debate findings are being used to inform every London borough's childhood obesity action plan and also informed the devolution deal for London, which now puts the capital in stronger position to tackle the childhood obesity crisis.

Policy E10 Visitor Infrastructure

User: Mr Peter Eversden MBE

Policy E10 F is incomplete. It is not only the need to avoid compromising housing provision in the supply of short term lets but it is important, as explained in paragraph 6.10.4, "that the impact such provision can have on traditionally residential areas is addressed."

Those words should be in section F of the policy because short lets can result in such properties being overcrowded and they can be used for parties. That section of the policy should have added also 'Local environmental health officers should respond quickly to any nearby resident's complaint about noise or antisocial behaviour associated with short term lets.'

Sadiq Khan wrote to the Government on his concerns about short term lets and the London Assembly investigated the issues, led by Tom Copley AM. The Mayor has asked all short term letting agencies to "**ensure that customers of yours who want to let properties in London on a short-term basis for more than the 90-day annual cumulative limit are restricted from doing so through your website, unless they can prove that they have the relevant planning permission."**

Policy E10 F should also have words added to require that 'Boroughs should check that short-term lets are for a maximum of 90 days.', as AirBnB have now agreed to impose.

User:	Arup

- E10 – Visitor Infrastructure
  Given the choice, I think most people will choose the 10%, and so there will still be a lack of hotel rooms available for assisted use (with hoists etc.). Therefore, wonder if the 15% should be pushed, or a note to say that the 10% will need to include a proportionate provision of the types specified in BS 8300 (independent, assisted, for ambulant disabled people, etc.).

User: Mr Oliver Bennett

In the "Projections of demand and supply for visitor accommodation in London to 2050" (Working Paper 88) it is noted that, in 2015, of the total of 138.5 million visitor nights spent in London, 78% were from international visitors. 85% of these international visitor nights arose from non-business travel, i.e. leisure visits and visiting friends and relatives (VFR). Growth in both international and domestic visits is projected on a straight-line basis to 2050.

What is highly likely is that the proportionate make-up of international visitors will change during this period, notably with higher rates of growth from Asia, notably from China. The number of visits from China to the UK rose by 27% in the first quarter of 2017 as against 2017, an indication of trends to come.

For these visitors the iconic attractions contained in central London are of especial importance. Diverting Chinese visitors from Buckingham Palace and the Palace of Westminster, for example, to attractions in outer London will be especially challenging.

The London Tourism Impact Study, prepared in 1989-90 for the London Planning Advisory Committee and the then London Tourist Board, considered the impact of tourism on heritage sites and on the transport system. Such a consideration seems to be lacking from the London Plan and from the support documents underlying it.

Measures to control tourism flows are likely to become increasingly essential in order to avoid conflict with London’s residents. Such conflicts will detract from London as a destination and render straight line projections of demand implausible. Any loss of reputation reduces the attractiveness of London as a place to live, work and invest.

In the London Tourism Impact Study consideration was given the limitation of visitor flows to key attractions by rationing and/or by price. To date there has not been any coherent response in London, although for St Paul’s Cathedral and for Westminster Abbey there is a degree of rationing by price.

Without consideration and implementation of measures to address visitor management, it may be necessary to reduce the rate of increase for serviced visitor accommodation as put forward in the London Plan. It could even lead to a need to engage in 'demarketing' activities – i.e. an attempt to make London (or parts of the city) less attractive generally (or to certain groups in particular) to make the situation more sustainable.

User: Mr Oliver Bennett

While the objective of the distribution of tourists across the whole city is a laudable one, there appear to be no practical measures contained in the Plan to achieve it. Market trends rather point in the opposite direction, of increased emphasis on iconic attractions (Palace of Westminster, Buckingham Palace, Tower of London etc.) among the likely geographical markets for London. This can lead to the perils of 'overtourism' as already experienced in a number of major European cities. There need to be practical measures to address these risks if London is to maintain its leading position as a tourism destination.

User: London Hotel Group

Q+A Planning Ltd act on behalf of the London Hotel Group (LHG). LHG own and operate hotels across London,. These hotels are operated in partnership with global brands, such as Ibis (AccorHotels Group) and Best Western. They also have ambitious plans to expand their hotel representation in London, taking advantage of the significant growth in tourism and business activity. Recent hotels have opened in Wembley and Croydon.

On behalf of LHG, we support the overall thrust of policy E10, including its objective to strengthen London's visitor economy and associated employment. However, we wish to object to the wording of the policy since – if not interpreted consistently - it has the potential to frustrate rather encourage growth in London's visitor economy, particularly in respect of the delivery of serviced accommodation.

Our main concern surrounds part (E) of policy E10, which states that *'in outer London and those parts of inner London outside the CAZ, serviced accommodation should be promoted in town centres and within Opportunity Areas where they are well-connected by public transport, particularly to central London'*.

Whilst we don't object to the initial promotion of visitor accommodation in town centres, read in isolation this policy could be seen to preclude hotels on edge of centre or out of centre sites, should no sites in town centres be suitable or available (in other words, the sequential approach as set out in paragraph 24 of the NPPF). Whilst it is appreciated that policy SD8 addresses the sequential test, we consider that it should be recognised in policy E10 that it is not always possible to deliver hotels in town centres, due to the suitability of sites that are available or simply due to the lack of available sites.

LHG operate hotels within town centres, as well as on accessible edge and out of centre sites. When developing hotels, LHG have found that there are often not sites available or suitable within town centre locations. The NPPF is clear that hotels coming forward on edge or out of centre sites should not be precluded, if the sequential test has been applied to a planning application. Applying a rigid approach to the location of hotels in solely town centres is inconsistent with paragraphs 23 and 24 of the NPPF as well as creating an artificial barrier to delivering the needs for new hotels as specified in paragraph 6.10.1. If read in isolation without reference to policy SD8, this could be the interpretation given to the policy. Therefore, for the avoidance of doubt the words 'or edge or out of centre sites, if no town centre sites are suitable and available' and after the words 'town centres' in part E of policy E10.

Our second concern surrounds the support given to apart-hotels at part (F) of policy E10. LHG include apart-hotels in their existing portfolio and also are actively promoting apart-hotel developments. Therefore, we welcome the 'in principle' support given to apart-hotels together with short term lettings. However, we object to the qualification *'whilst ensuring that they should not compromise housing provision (see Policy H11 Ensuring the best use of stock)'* because it is unclear and therefore not effective. Policy H11 concerns ensuring the best use of housing stock and out of the three elements of the policy, only part (C) appears relevant, which states 'Boroughs should take account of the impact on the housing stock of applications for homes to be used as holiday rentals for more than 90 days a year'. This policy therefore appears to relate to the support given to 'short term lettings' rather than apart-hotels. Short term lettings relate to 'air bnb' type operations, which an apart-hotel represents serviced accommodation. This is clear

On this basis, there is clear potential for confusion in part E of policy E10 since it may infer some sort of wider analysis of the impact of an apart-hotel on housing provision in a broader sense than is required by policy H11. Indeed, policy H11 has no relationship at all to proposals for apart-hotels when its definition is understood. An apart-hotel, as defined at Annex 3 in the draft London Plan is as follows:

'Self-contained hotel accommodation (C1 Use Class) that provides for short-term occupancy purchased at a nightly rate with no deposit against damages. This will usually include concierge and room service, and include formal procedures for checking in and out. Planning conditions may limit length of stay for occupiers'.

An apart-hotel falls within the C1 use class and is effectively an evolution of the traditional hotel format. Its definition is quite distinct from that of short term lettings, which concerns the holiday rentals reference in policy H11. This distinction is confirmed in paragraph 6.10.4 which refers to alternative forms of accommodation such as 'short term lets', with no reference to apart-hotels. Therefore, we suggest that part E of policy E10 as it stands is misleading and would benefit from revision to make it clear that the qualification given applies on housing provision applies only to the short term lettings support. Therefore, the policy as it stands is ineffective and requires revision.

User: London Hotel Group

On behalf of LHG, we welcome the recognition that London needs to ensure that it is able to meet the accommodation demands of tourists who want to visit the capital. We also broadly support the quantitative estimates given that London will need to build an additional 58,000 bedrooms of serviced accommodation by 2041, which is an average of 2,230 bedrooms per annum.

However, we object to the failure of the plan to adequately ensure that there should be a distribution of visitor accommodation across London and a range of different standards and ratings in order to ensure the market is well catered and the wider aspirations on London's tourism market are realised.

In our view, the reason for this failure is the confusion that arises in paragraph 6.10.2 in respect of the difference between demand and need. The first sentence refers to a need to meet the accommodation 'demands' of tourists, whilst the second refers to what London will 'need' to build. The figure subsequent 58,000 bedroom figure cited is based on GLA Economics. Working Paper 88. Projections of demand and supply for visitor accommodation in London to 2050. Despite the title of the paper, the figure presented is a quantitative need (not demand) for London as a whole.

The Paper itself considers demand at a high level, considering the total number of visitors to London and the number of nights that they stay. It then calculates a need by comparing this demand to the existing and projected supply of rooms. The eventual output is global need for London, divided by Borough, with the shares based upon pipeline information from within the AMPM database. From a methodological perspective, the approach appears reasonable and a sensible starting point on which to set out needs for London. However, in our view the London wide figure should only be seen as a guide and the subsequent figures broken down by local authority should be treated with caution. Essentially, this is because the figures are quantitative outputs only. We highlight the following draw backs of only relying on a quantitative output:

- There is no recognition that there are different standards of accommodation – i.e. it is possible that there is a gap in the market for certain standards, which if delivered would enhance consumer choice.
- They do not take into account where existing hotels are located – i.e. the existing supply might be located in an unsustainable location, but because it exists it is serving a market which might be better met in a more sustainable location
- They do not take into other qualitative drivers in an area – such as tourism or employment - that may in effect create a demand that is not reflected in need outputs.

There is also no explicit engagement with the hospitality industry and that would support the analysis.

The NPPF is clear in paragraph 161 that local authorities should use their evidence to the needs for land or floorspace for economic development, including ‘both the quantitative and qualitative needs’. In this situation, the London Plan needs to set these out at a strategic level. Given the absence of any qualitative considerations, it is critical that the plan is sufficiently flexible to meet both demand and need.

The GLA will be aware that ‘need’ is not a development management planning policy test and the whole reason it was removed was to avoid artificial restraint of the market, restricting competition. Therefore, the need figures should not be treated as cap but rather a guide which to inform development plan policies and site allocations. In our experience, some Boroughs in London have been treating the need figures as targets in development management decisions which, once met, have been reached and therefore there is no further need to approve any further visitor accommodation. Adopting such an approach is an artificial constraint on growth and will put a handbrake on London’s aspiration for tourism.

At this stage, this paragraph addresses the quantitative element of needs at a strategic level but does not address any qualitative issues. Whilst it is appreciated that the qualitative elements might be more appropriately addressed at a Borough level, the plan should make this clear. Therefore, we suggest that this paragraph is refined to make it clear that that qualitative needs also should be considered when planning for additional visitor accommodation in London.

User: London Hotel Group

On behalf of LHG, we support the encouragement given to Boroughs in outer and inner London beyond the CAZ to plan proactively for new serviced accommodation. However, we object to the statement that this should be ‘in town centres to help spread the benefits of tourism to the whole of the capital’. It is accepted that the starting point for encouragement should be town centres, but we are concerned that there are no sites within the town centre, then sufficient support might not be given to edge or out of centre sites. The sequential test is a well-established tool to ensure that town centre uses (such as visitor accommodation) are delivered in the town centre first. However, if the sequential test is not properly recognised in this paragraph, there is a risk that policy compliant schemes that are promoted on sites where there is no suitable or available site will not be given the overarching support expressed in this paragraph.

User: Jeferson Branco

Dear Mayor Sadiq Khan,

I, Jeferson Branco, Brazilian citizen and architecture student currently on my last semester of college, am sending you this message about a subject I think we both care about: Gender-neutral public toilets. I just saw on the news your concern about the importance of expanding the numbers of it in London, and there is some contribution of mine that may be interesting for your plans.

Sooner this year I was participating on a national architecture contest about toilets design and it ended up very well. I won on my category which was "public toilets for the underground" where my proposal was a Gender-neutral public toilet, and further of that, I also won the general prize of the night. On my view, this was way more a victory for my nation then just for me. Brazil is unfortunetly the country that kills the most trans-people per year.

But the most interesting part of the project is that it was inspired by the great British designer: Henry Charles Beck. Beck on his days, revolutionized the way of how people uses the underground until nowadays with his diagram. Before that, it was hard for a lot of people to understand the way the underground works and with his proposed diagram, he had made possible for everyone to utilize it. What on my view, is just the same of what we are trying to do with the toilets today. Simplifying the use of it and making a way of how everybody can use it safely, comfortably and free of any prejudice.

Below you will find a link to my online portfolio where you can take a look at the project if it's of your interest.

https://www.behance.net/gallery/59910967/1-Colocado-Concurso-Deca-BANHEIRO(A)

Thank you for your prompt attention.

Best regards,

Jeferson Branco

User: The Access Association

Policy E10 Visitor infrastructure

G

The proposal to improve the offering of hotel and apart-hotel accommodation for disabled people and older is to be encouraged and provides greater opportunities for many families.

The policy only talks about showers no mention of bath some disable people need to be able to soak in a bath to help their mobility.

There is no mention of accessible parking for blue badge holders, which is vital to many disabled people to allow them to get out and about.

Could do with advice on making an apart hotel accessible to all.

User:	London Food LInk /Sustain

London’s parks and gardens within the wider metropolitan open land and green belt are a great focus for tourism. We would like to see productive use of these spaces for food growing and gardening encouraged, and with associated facilities for visitors and the people involved in gardening.

It’s important to celebrate and showcase our progress and status in terms of food growing and urban agriculture to visitors. It shows our commitment as a leader to be a more green, healthy, sustainable and community centred city. Examples are kitchen gardens at National Trust properties – e.g. Osterley Park; Capital Growth allotment at Regent’s Park.

User: London Forum of Amenity and Civic Societies

Policy E10 F is incomplete. It is not only the need to avoid compromising housing provision in the supply of short-term lets, but it is important, as explained in paragraph **6.10.4,** "that the impact such provision can have on traditionally residential areas is addressed." Those words should be in section F of the policy because short-lets can result in such properties being overcrowded and they can be used for parties. That section of the policy should have added also 'Local environmental health officers should respond quickly to any nearby resident's complaint about noise or antisocial behaviour associated with short term lets.'

Sadiq Khan wrote to the Government on his concerns about short-term lets and the London Assembly investigated the issues, led by Tom Copley AM. The Mayor has asked all short-term letting agencies to "ensure that customers of yours who want to let properties in London on a short-term basis for more than the 90-day annual cumulative limit are restricted from doing so through your website, unless they can prove that they have the relevant planning permission."

Policy E10 F should also have words added to require that “Boroughs should check that short-term lets are for a maximum of 90 days”, as AirBnB have now agreed to impose. Nevertheless, London Forum would **urge** the Mayor to adopt a much tougher approach to the encroachment of the “sharing economy” on London’s housing stock. **A new policy is needed to tackle this issue!!**

Policy E10 contains a desire for serviced accommodation to be maintained and developed both within the Central Activities Zone and in town centres and Opportunity Areas outside it. There is also a wish expressed for tourism to be promoted across the whole city. There is, though, no practical set of measures for achieving this. The emphasis on accommodation in Opportunity Areas that "are well-connected by public transport, particularly to central London" suggests that no significant change in the geographical pattern of usage of visitor attractions is anticipated**. Policy E10 should be amended to cover that.**

Policy E10 should be modified and it, or the paragraphs following it, should have something on the following points: In Chapter 7 reference is made to the four UNESCO World Heritage sites in London, namely Maritime Greenwich, Royal Botanic Gardens Kew, Palace of Westminster and Westminster Abbey including St Margaret's Church, and the Tower of London. St Paul's Cathedral is referred to under the management of views as is Buckingham Palace. The role of the Central London sites as iconic tourist attractions is not specifically considered.

In the "Projections of demand and supply for visitor accommodation in London to 2050" (Working Paper 88) it is noted that, in 2015, of the total of 138.5 million visitor nights spent in London, 78% were from international visitors. 85% of these international visitor nights arose from non-business travel, i.e. leisure visits and visiting friends and relatives (VFR). Growth in both international and domestic visits is projected on a straight-line basis to 2050. What is highly likely is that the proportionate make-up of international visitors will change during this period, notably with higher rates of growth from Asia, notably from China. The number of visits from China to the UK rose by 27% in the first quarter of 2017 as against 2017, an indication of trends to come. For these visitors the iconic attractions contained in central London are of especial importance. Diverting Chinese visitors from Buckingham Palace and the Palace of Westminster, for example, to attractions in outer London will be especially challenging.

Over the last year, the issue of 'overtourism' has come to the fore in the consideration of sustainable tourism. In January 2018, CNN published a list of destinations travellers might want to avoid in 2018. The list includes Barcelona, Dubrovnik and Venice (where UNESCO is threating to remove the World Heritage designation due to extreme overcrowding). The London Tourism Impact Study, prepared in 1989-90 for the London Planning Advisory Committee and the then London Tourist Board, considered the impact of tourism on heritage sites and on the transport system. **Such a consideration seems to be lacking from the New London Plan and from the support documents underlying it** . Measures to control tourism flows are likely to become increasingly essential in order to avoid conflict with London's residents **and should be included in Policy E10**. Such conflicts will detract from London as a destination and render straight line projections of demand implausible. Any loss of reputation reduces the attractiveness of London as a place to live, work and invest.

In the London Tourism Impact Study consideration was given the limitation of visitor flows to key attractions by rationing and/or by price. To date there has not been any coherent response in London, although for the Tower of London, St Paul's Cathedral and for Westminster Abbey there is a degree of rationing by price. Without consideration and implementation of measures to address visitor management, it may be necessary to reduce the rate of increase for serviced visitor accommodation as put forward in the New London Plan. It could even lead to a need to engage in 'demarketing' activities - i.e. an attempt to make London (or parts of the city) less attractive generally (or to certain groups in particular) to make the situation more sustainable.

Paragraph 6.10.1 - While the objective of the distribution of tourists across the whole city is a laudable one, there appear to be no practical measures contained in the Plan to achieve it. Market trends rather point in the opposite direction.

This can lead to the perils of 'overtourism' as already experienced in a number of major European cities. There need to be practical measures to address these risks if London is to maintain its leading position as a tourism destination.

Paragraph 6.10.2: Unlike the current consolidated London Plan Policy 4.5 A(b), which sets a target of 40,000 net additional hotel bedrooms by 2036, Policy E10 provides **no target**, but paragraph 6.10.2 “estimates that London will need an additional 58,000 bedrooms by 2041, which is an average of 2,230 bedrooms per annum.”

User:	Withernay Projects
E10G needs reference to BS 8300-2 to make sense of the different categories of accessible hotel rooms.	

User: Ms Meenakshi Sharma

F

1. The role of apart-hotels and short-term lettings should be supported whilst ensuring that they do not compromise housing provision (see Policy H11 Ensuring the best use of stock).

This does not make sense. Of course they will compromise housing provision. It is obvious if something is used for one purpose it cannot be used for another.

User: Ms Meenakshi Sharma

6.10.3

Boroughs in the CAZ are encouraged to direct strategically-significant serviced accommodation (defined as more than 20,000 sqm in the CAZ) towards the CAZ Opportunity Areas with smaller-scale provision in other commercial core areas of the CAZ. Concentrations of serviced accommodation within parts of the CAZ that might constrain other important strategic activities and land uses (for example offices and other commercial, cultural and leisure uses) or erode the mixed-use character of an area should be avoided. **Boroughs in outer and inner London beyond the CAZ** are encouraged to plan proactively for new serviced accommodation in town centres to help spread the benefits of tourism to the whole of the capital.

We need this to be specified for each Borough, so that certain boroughs, whose councils want the money rather than caring about providing housing for their population do not prioritize this type of accomodation.

User: Association of Licensed Multiple Retailers

The London Plan supports the use of sharing economy platforms, provided they do not impact negatively on housing. In reality, though, sharing economy platforms are already having a negative impact on housing in the capital – of the 168,000 properties that are listed in the UK, 65,000 are in London. According to a recent report, 1,190 new listings are added each month in London.[1]

The loss of housing stock is a significant issue with short term lettings, but to focus only on the problems posed to housing overlooks the other negative impacts of sharing economy platforms.

Properties listed on Airbnb and similar websites have frequently been involved in issues of disturbances, and are subject to little of the regulation to which traditional forms of accommodation must adhere. Hotels and other accommodations providers are required to submit to safety regulations that ensure that they are fit for purpose which sharing economy rentals are not.

Furthermore, as there is no central register of the properties listed on sharing economy platforms, it is impossible, in the event of an emergency, for the emergency services to know how many people are in a property at any one time, nor is it possible to enforce the 90-day limit on short term lettings.

Sharing economy platforms in London are subject to very little regulation compared to much of the rest of the of Europe and North America. Other major cities have acknowledged the negative impacts have to be mitigated to ensure that housing stock is not removed from long term circulation, communities are not eroded by empty properties and that visitor accommodation is safe for public use.

[1] Jones Lang LaSalle October 2017

User: UKHospitality

The London Plan supports the use of sharing economy platforms, provided they do not impact negatively on housing. In reality, though, sharing economy platforms are already having a negative impact on housing in the capital – of the 168,000 properties that are listed in the UK, 65,000 are in London. According to a recent report, 1,190 new listings are added each month in London.[1]

The loss of housing stock is a significant issue with short term lettings, but to focus only on the problems posed to housing overlooks the other negative impacts of sharing economy platforms.

Properties listed on Airbnb and similar websites have frequently been involved in issues of disturbances, and are subject to little of the regulation to which traditional forms of accommodation must adhere. Hotels and other accommodations providers are required to submit to safety regulations that ensure that they are fit for purpose which sharing economy rentals are not.

Furthermore, as there is no central register of the properties listed on sharing economy platforms, it is impossible, in the event of an emergency, for the emergency services to know how many people are in a property at any one time, nor is it possible to enforce the 90-day limit on short term lettings.

Sharing economy platforms in London are subject to very little regulation compared to much of the rest of the of Europe and North America. Other major cities have acknowledged the negative impacts have to be mitigated to ensure that housing stock is not removed from long term circulation, communities are not eroded by empty properties and that visitor accommodation is safe for public use.

[1] Jones Lang LaSalle October 2017

User:	David Bonnett Associates

Student accommodation is not specifically covered. It is suggested to highlight / encourage inclusive design in supporting text—not specifying #s, but inclusion generally and for specific / common areas such as kitchens, social spaces, etc. Include reference to BS 8300-2. For example, paragraph 5.3.6. following Policy S3 Education and childcare facilities reads '. . . *It is important that all schools are designed to be accessible and inclusive, meeting the highest standards of accessible and inclusive design (see Policy D3 Inclusive design)*'. Sometime similar could support inclusion in student accommodation.

User:	Inclusive Design and Access Panel

Chapter 6 Economy

- E10 – A, support, very encouraging.
- E10 - G, Support and very encouraging to see the additional provision included.

User:	Putney Society

Para 6.10.1 We agree that tourism should be promoted across the whole of the city. Putney has a unique heritage with its long association with rowing, still marked each year with national and international events, the best known being the Oxford and Cambridge Boat Race. This is celebrated and promoted locally and beyond; further publicity focusing on its historical significance would be beneficial. Again, the need for adequate visitor accommodation and public toilets to support such events is of high importance.

User:	Putney Society

Para 6.10.4 We agree with the need to offer alternative forms of accommodation whilst ensuring that short lets such as offered by Airbnb do not distort the balance between more conventional lets and the residential sectors.

User:	Battersea Society Planning Comittee

We endorse the proposals set out in the following and trust that action will be taken without delay.

User: London Borough of Islington

Draft London Plan Policy

Policy E10 – Visitor infrastructure

Islington Response

Islington have a very strong record of delivering visitor accommodation, with a number of visitor accommodation schemes in the development pipeline. Business floorspace, particularly B1 floorspace, is the main driver of economic growth in the borough and is considered the best means to meet Islington's significant jobs projection. Therefore, in Islington we consider visitor accommodation should be restricted to ensure that it does not limit the achievement of other priorities, particularly economic growth. We also note the demand for other competing objectives such as designation for the Creative Enterprise Zone and the retail cluster at Farringdon, which could both be affected by a more laissez faire approach to hotel provision. Our own up-to-date local evidence supports this and notes that hotels can squeeze out office uses, something which has materialised in several planning appeals. There should be a specific reference to policy conflict, particularly in the CAZ, upfront in Part A of the policy. We consider that the Mayor should defer prioritisation to boroughs based on local evidence.

Part C specifically references accommodation for business visitors, but this is impossible to distinguish when planning for visitor accommodation. Even where specific business visitor need could be identified, it could not be effectively managed through planning, for example you could not condition a hotel to be exclusively for business users. Part C reads more like supporting text and would fit well as part of para 6.10.2, if reworded to discuss the need to consider business visitors as well as tourists when planning for visitor accommodation.

Part D directs strategically important serviced accommodation to Opportunity Areas with smaller scale provision in the commercial core parts of the CAZ subject to the impact on strategic office space; in Islington this is the core parts of the City Fringe/Tech City Opportunity Area. Therefore, Part D directs both strategic and smaller scale provision to the same place in Islington, which is also the area where office uses are most strongly prioritised in local and London policy. This is a significant conflict which will be particularly damaging to policies which look to protect and promote offices in these areas, and therefore will have knock on effects on the ability to secure affordable workspace. The policy should allow boroughs to put in place more restrictive local policies where supported by detailed evidence, particularly evidence supporting new office provision.

The wording of the last sentence of Part D need to be much clearer, with removal of the double negative. It should also refer to intensification of provision generally, rather than in areas of existing concentration. Concentration is a subjective concept which can only be determined on a case-by-case basis, and therefore is at odds with planning strategically for areas. A simpler sentence such as the following is more suitable:

“Intensification of provision of serviced accommodation should be resisted where it compromises local amenity or the balance of local land uses,”

Part F supports short-term lettings where they do not compromise housing provision. Due to the changes in the Deregulation Act, local authorities have little scope to resist short-term lets of 90 days or less, but where a planning application is required

(i.e. where use is for more than 90 days), such a change will always affect housing provision. Therefore, we do not understand why the Mayor has expressed such broad support. We consider that the policy should be amended to directly acknowledge this impact

Para 6.10.2 refers to the estimated strategic need of 58,000 bedrooms of serviced accommodation by 2041, which has been derived from a GLA Economics paper. This paper has some significant flaws which undermines the estimated level of strategic need. Firstly, it doesn’t reflect the deregulation of short term lets in projections, which could help meet a lot of demand for visitor accommodation. In Islington, there are over 1,800 AirBnB listings for a whole home/flat in Islington, let at an average 92 days per annum (around a quarter of a year). These listings could be considered analogous to around 450 hotel rooms (in terms of available supply over a full year), which is a significant stream of supply (and which relates to just one operator in the market - there are numerous others).

Like most projections, there are a significant number of variables which underpin the target identified in the paper. However, in the case of visitor accommodation, the variables are complex and dependent on macro-economic and political issues. Therefore, there should be considerable caution when using the outputs of the paper. For the gross scenario, the paper applies a rate of closure of 0.4% uniformly across boroughs; this is based on the average share of the total serviced rooms supply that has closed over the past five years. However, the closure rate from borough to borough could be significantly different, and in boroughs where hotels are more viable (like Islington), it is reasonable to expect that closures would be less than average. Even a minor change to the modelled closure rate could have a significant impact on the gross figure.

The council are supportive of the need for accessible visitor accommodation for disabled people. However, we feel the very prescriptive list of requirements for providing 15% of bedrooms with varying degrees of accessibility will be very challenging to monitor and could contribute to a potential demise of the quality of disability accessible accommodation, given many of the criteria refer to interior adaptations such as hand rails. We consider that the 10% wheelchair accessible room requirement in Part G(1) should apply unless boroughs choose to put in place the more prescriptive requirements; the requirements in Part G(2) could be given as an example of more prescriptive requirements in the supporting text.

Para 6.10.4 supports use of student halls as visitor accommodation during university vacation periods. This conflicts with policy H17 which supports use of such accommodation for ancillary uses during vacation periods. General visitor accommodation would not be ancillary to student accommodation; any ancillary use must be a specific use related to a university activity. Reference to student halls in para 6.10.4 (the last two sentences) should be removed.

User:	London Borough of Islington

Para 6.10.4 supports use of student halls as visitor accommodation during university vacation periods. This conflicts with policy H17 which supports use of such accommodation for ancillary uses during vacation periods. General visitor accommodation would not be ancillary to student accommodation; any ancillary use must be a specific use related to a university activity. Reference to student halls in para 6.10.4 (the last two sentences) should be removed.

User: PPHE Hotels Group

We are strongly supportive of Policy E10 (Visitor Infrastructure) and agree London's visitor economy and associated employment should be strengthened by enhancing and extending its attractions, inclusive
access, legibility, visitor experience and management and supporting infrastructure, particularly to parts of outer London well-connected by public transport, taking into account the needs of business as well as leisure visitors.

We know that the hotel currently located at 628 Western Avenue is successful and is proving an attractive location for visitor accommodation, particularly in light of its close proximity to Park Royal underground station. The site is located within, but on the edge of the SIL designation and it is our view that this will continue to be an acceptable location for further hotel uses in addition to SIL uses.

User:	City of London Corporation

The City Corporation supports the promotion of appropriate visitor infrastructure as set out in this policy and the commitment to conserving, enhancing and promoting London's cultural infrastructure and the recognition of its role in attracting visitors to the capital. The Corporation welcomes the statement that serviced accommodation to serve the visitor community in central London should primarily be located within CAZ Opportunity Areas or the City Fringe and that only small scale serviced accommodation should be permitted within the CAZ commercial core in order to maintain the London Plan policy priority for office development within this area.

The policy should give an appreciation the kinds of uses deemed essential visitor infrastructure, for example, theatres, public houses and sky gardens/viewing galleries which offer a unique tourist experience. The City of London is at the forefront of delivering an internationally unique cluster of high level viewing galleries which will be accessible and welcoming to all. Examples include 22 Bisphosphate, 6-8 Bishopsgate, 1 Leadenhall Street, 120 Fenchurch Street and 20 Fenchurch Street.

User: London Borough of Lambeth

Lambeth supports the proposed policy approach and in particular the scope to limit the further proliferation of existing concentrations of visitor accommodation.

Please include a definition of ‘smaller scale’.

Lambeth is concerned about the apparent increase in proposals for purpose-built serviced apartments/short-term letting accommodation ‘flipping’ to C3 use without permission. After four years this becomes lawful (unless it comes to the attention of Lambeth’s enforcement team before then, which is unusual). Affordable housing and CIL contributions are forfeited as a result. London Plan policy should directly address this problem.

User:	Better Bankside Business Improvement District

Historically Bankside was London’s entertainment quarter for activities which would not have been officially permitted within the City, and today it remains a hub of entertainment - home to some of the world’s most renowned cultural institutions, Tate Modern, Shakespeare’s Globe and Borough Market. On average, over 2.5 million people are recorded each month via Better Bankside’s footfall cameras. The area has almost 2000 hotel rooms. In response to point 6.10.2 and meeting the accommodation demands of tourists, Better Bankside in turn need to ensure infrastructure in an area supports the overnight visitors. If a 24-hour city is to be achieved in London, there needs to be consideration of noise implications to residents, street cleaning teams, confidence in the streets late at night and appropriate policing, as well as an effective late-night transport system.

User:	West End Partnership

The Partnership is of the view that draft Policy E10F in respect of short term letting is unduly lax and fails to appreciate the impacts that unregulated short term letting and the phenomenal growth of app-based home sharing and letting platforms have had on residential neighbourhoods in parts of the CAZ and the West End in particular. The DRLP should be supporting those boroughs and established hotel and visitor accommodation providers in seeking a level playing field and a London-wide compulsory registration scheme.

User:	London Borough of Haringey

The Council supports this policy. The bulk of the visitor economy will centre on the CAZ, however it will also at points overlap with the Outer London boroughs, particularly where those boroughs host specialist or niche assets. The London Plan should ensure Outer London Boroughs also benefit from “A sufficient supply of serviced accommodation for business visitors should be maintained”.

User:	London Cycling Campaign

Add:
and supporting infrastructure ***(including high quality cycle routes)***, particularly…

See 6.10.1 p262 “measures to promote access by walking, cycling and public transport.”

User:	London Borough of Lewisham

We support E10, as we are developing a new Cultural Strategy which will aim to increase visitor numbers to Lewisham and maximise the top 10 visitor attractions.

Questions have been raised that E10 is overly detailed prescriptive in terms of accessibility as this may restrict the development of future accommodation for visitors.

User:	London Borough of Brent

The Council supports the policy, but requests that clarity is provided on whether there is still a need to provide Accessibility Management Plans for hotels.

User:	London Borough of Bromley

The policy is noted. Further clarification should be provided to differentiate between Visitor Infrastructure and ‘Purpose Built Shared Living’ (Draft London Plan Policy H18)

User: London Borough of Tower Hamlets

We support this policy, although we have some concern over serviced apartments. The policy seems to be too permissive of serviced apartments which could potentially undermine housing/job targets, particularly if the pressure for this type land use continues as it has done within LBTH. Further guidance should be provided in the supporting text to provide greater clarity on how to ensure the delivery of apart-hotels and short-term lettings do not compromise housing provision (part F). H11 seems to only provide guidance on a unit by unit basis or for the conversion of residential to short-term lettings. Protection should also be given to sites which should be prioritised for housing development, rather than short-stay accommodation.

There are also no figures provided for additional accessible bedroom requirements.

User:	Royal Borough of Kingston

RBK is concerned that the policy is too focussed on central London, with a lack of reference to the visitor attractions of outer London areas. The policy lacks references to general visitor accommodation such as hotels, B&Bs etc, and leisure facilities.

User: London Borough of Hackney

Hackney is close to meeting its current and future demand for visitor accommodation based on a 2013 GLA study and therefore careful consideration is needed to ensure an appropriate mix and balance of uses continue to come forward within the CAZ based on identified needs.

It is recommended that Part D of the policy should acknowledge that future provision of visitor accommodation should come forward where there is an identified need. See suggested text below:

Within the CAZ, strategically important serviced accommodation should be promoted in Opportunity Areas where there is an identified need, with smaller-scale provision in the commercial core parts of the CAZ (see Policy SD5 Offices, other strategic functions and residential development in the CAZ), subject to the impact on strategic office space. Intensification of the provision of serviced accommodation in areas of existing
concentration should be resisted, except where this will not compromise local amenity or the balance of local land uses.

User:	London Borough of Hounslow
LB Hounslow supports this policy	

User: Hammersmith and Fulham Disability Forum

40. Policy E10: Visitor infrastructure:
We do not understand what serviced accommodation means. It would be helpful to clarify what it includes e.g hotels, guest houses, apart hotels, serviced apartments, student hostels etc and what the access and inclusion standards are. Reference to relevant guidance is essential to ensure policy D3 Inclusive Design is achieved to meet the needs of disabled visitors to London.

User: InLinkUK

Policy E10 Visitor infrastructure

Seeing tourists using paper maps is becoming less common in cities like London as more people rely on their mobile phones and other devices to navigate their way around. wherever they may be visiting. This trend has made affordable digital connectivity an essential element of visitor infrastructure.

Providing areas and spines or free/affordable digital connectivity is now an important factor in ensuring visitors have a positive experience of London. Fortunately the private sector is willing and able to assist in providing such services, and reducing pressure on taxpayer funds.

Recommendation #16

? That Policy E10 be updated so that technologies and services providing digital

connectivity are recognised as key forms of visitor infrastructure.

User: Westminster City Council

Criterion D should make clear that the provision of serviced accommodation in the core parts of the CAZ should be subject to the impact on a wider range of important clusters of commercial use than just office space; to conform with the explanatory text at paragraph 6.10.3. The commercial core of the CAZ includes important clusters of other uses that merit protection; such as the retail and leisure provision in the West End, medical uses at Harley Street, institutional uses at Portland Place etc.

We strongly object to the support for nightly lets in criterion F. The plan fails to recognise that such practice can be detrimental to local amenity, security, and quality of life of neighbouring residents. It also fails to recognise that this prejudices the priority rightly given to ensuring a stock of housing meeting a range of needs. If any policy of this kind is retained, it must make clear that nightly lets should only be for a maximum 90 nights per year in recognition of their negative impacts.

Whilst accessibility is an important issue, it is unclear if the standards set out in criterion G are deliverable, or based on any robust assessment of need.

User:	London Borough of Southwark

The council supports the provision of visitor accommodation in town centres and opportunity areas within the CAZ. However, the provision of strategic office space in the CAZ should continue to be prioritised where it is at risk of loss.

User:	London Borough of Redbridge

The Council supports this policy and seeks to create a visitor economy, particularly in Ilford with access to the Elizabeth Line.

User:	London Borough of Wandsworth

Welcome the approach to supporting the location of hotels and serviced accommodation within town centres and the CAZ.

The aim of the policy could be improved by the requirement to seek planning permission for rentals of more than 90 days p.a. stated in paragraph 4.11.2 becoming a policy criterion either in Policy H11 or Policy E10 (f).

User:	London Borough of Richmond Upon Thames

No comments.

User:	Marble Arch Partnership

We are concerned that the Plan should take a stronger approach to tackling short term lets. We have a huge number of short term lets that have taken over permanent residential flats within the large mansion blocks in our area. These are not a new problem but are being fuelled by London's booming gig economy. While they contribute to demand for restaurants and late night entertainment, they can have a devastating effect on communities where they become intensified and outstrip regular residential uses. They can also harbour organised crime, such as vice and trafficking. The plan should have a clear policy preventing the use of residential premises as short term lets. The Plan might usefully have a policy that promotes the development of properly designed short term lets in appropriate locations.

User:	London Borough of Harrow

The Council supports this policy. The bulk of the visitor economy will centre on the CAZ, however it will also at points overlap with the Outer London boroughs, particularly where those boroughs host specialist or niche assets. The London Plan should ensure Outer London Boroughs also benefit from “A sufficient supply of serviced accommodation for business visitors should be maintained”.

User:	London Borough of Enfield
Policy E10 ‘Visitor Infrastructure’ needs to clarify what the definition of ‘well connected’ is with regard to visitor infrastructure provision.	

User: Just Space

Policy E10 Visitor infrastructure

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

Proposed change:

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

1) at least10 per cent of new bedrooms to be wheelchair-accessible;

2) all other rooms to meet the standards for ‘accessible and adaptable dwellings’

User:	London Borough of Bexley

The Council supports Policy E10 Visitor infrastructure for managing short-term lets in order to not compromise housing provision. However, this is difficult for the Council to monitor and manage given that most of these short-term lets are available online through a number of providers.

User:	Federation of Small Businesses

The high number of visitors expected in the coming 10-20 years demonstrates why we need to commit to this infrastructure. Investing in Crossrail 2 and other transport modes is critical for these growing visitor numbers.

User:	Federation of Small Businesses
We wholeheartedly support this measure.	

User:	Federation of Small Businesses
We wholeheartedly support this measure.	

User:	Federation of Small Businesses
We wholeheartedly support this measure.	

User: Chartered Institute of Architectural Technologists

Economy

Policies E1 to E11

We are in agreement with the proposals contained in the plan.

User: Uttlesford District Council

Policy T8 (Aviation) of the draft London Plan makes clear the London Mayor's opposition to expansion of Heathrow Airport. However, the same Policy acknowledges that additional aviation capacity is required in the South East, and that this is 'crucial to London's continuing prosperity and to maintaining its international competiveness and world-city status'. This is related to a number of other policies in the draft Plan, including for example, Policy E10 (Visitor Infrastructure), which seeks to promote the tourism industry across London. More pertinently, this is directly related to Policy GG5 (Growing a good economy) which seeks to enhance London's global economic competitiveness. It should be noted that promoting additional airport capacity in the South East is part of a much wider debate on how UK aviation policy should develop in the medium and longer terms. In spite of the recent consultations on the draft Airports National Policy Statement and the new Aviation Strategy (phase 1), there seems to be an emerging policy vacuum on regional airport development, which the Council regards as a serious shortcoming. This is an issue that the Local Government Association, via its Strategic Aviation Special Interest Group, intends to pursue with ministers and civil servants.

Stansted Airport (owned and operated by MAG Airports) is an international gateway to the Capital and is recognised as a 'London' airport. In 2014 the airport was handling 20 million passengers per annum (MPPA) and 230,000 tonnes of freight. The airport currently benefits from planning permission that will see capacity expand to 35 MPPA by 2025, with freight handled also increasing to 243,500 tonnes per annum. Future growth ambitions exist and a planning application has been received that seeks the airport to expand such that it can handle 43.5 MPPA by 2030 as well as 400,000 tonnes of freight per annum.

Paragraph 10.8.7 of the draft London Plan makes reference to the potential for additional flights to and from Stansted Airport, making 'better use of its single runway'. The term "better use" needs to be treated with caution. Whilst the forthcoming planning application is unlikely to propose any increase in the number of permitted air transport movements at the airport, air noise (amongst other issues) is a key issue for local residents, especially from night flights and because of low background noise levels. As the local planning authority, the Council would need to carefully weigh the economic benefits of "better use" against the social and environmental dimensions that are also integral to sustainable development.

Policy T8, and supporting text to this, also note the importance of providing improved surface access links, particularly rail, to and from airports, and that existing proposed schemes, such as Crossrail 2, should not be relied upon to cater for additional airport growth. The London Mayor calls for ‘major investment by the airport authority and central Government in new infrastructure’. The GLA also has a significant role to play and, as set out in Policy SD2 and SD3, will need to collaborate with partners and explore ways to help fund and deliver strategic surface access infrastructure which is of benefit to London and the wider South East. Indeed, given that the policy approach of the draft London Plan is to push the negative impacts of air traffic away from London to other localities, it is essential that the GLA take a proactive role in helping to mitigate the adverse impacts of such an approach.

User: CBRE Global Investing

Policy E10 seeks to strengthen London's visitor economy and associated employment, and extend its attractions, inclusive access, legibility, visitor experience and management and supporting infrastructure. Part C specifically refers to the sufficient capacity of visitor accommodation and provision of high-quality convention facilities in town centres and in and around the CAZ.

CBRE Global Investors supports this policy, which seeks to enhance the visitor economy throughout London. This should be particularly focused towards the CAZ and sustainable locations, such as town centres and Opportunity Areas. CBRE Global Investors also considers that visitor accommodation should also be provided in areas of future planned infrastructure where appropriate, with links to central London and other key visitor requirements and that these point should be added to part E of the Policy.

Proposed Policy Amendment Sought

E In outer London and those parts of inner London outside the CAZ, serviced accommodation should be promoted in town centres and within Opportunity Areas where they are well-connected by public transport (existing and planned), particularly to central London and other key employment or tourist destinations.

User:	Brixton Society

E10, Visitor infrastructure: It is disappointing that this only deals with overnight accommodation. Centres like Brixton receive many day visitors, and increasingly, many more night-time visitors to entertainment venues and bars. These visitors are generally from the rest of Greater London or just beyond, and to a lesser extent visitors from abroad staying in Central London hotels. There are acute needs for public toilets and better way-finding.

*See also under **HC6** below.*

Short-term lets and serviced apartments should be resisted, because they can too easily become long-term accommodation at inferior standards.

User:	London Property Alliance
The level of detailed prescription around hotel room design is unnecessary for a strategic plan.	

User:	Here East
Here East supports Policy E10’s mention of the need to conserve, enhance and promote major clusters of visitor attractions. This is of relevance to Here East due to the proposed new presence of the V&A, which will also be in close proximity to the Stratford Waterfront site.	

User:	London Borough of Newham

Policy E10 Visitor Infrastructure

LBN are generally supportive of the policy which is complementary to Newham's Draft Revised Local Plan, particularly the guidance on accessible bedrooms which is useful in setting development norms at the Pan-London level.

However Part F and the enabling approach in Part E could better acknowledge the issue of purpose built apart-hotels potentially displacing conventional housing capacity (i.e. sites) – as student housing as in recent years.

There also remains a need to avoid the pitfalls of unregulated growth of 'AirBnB' type accommodation use, which brings no jobs to the area; can negatively impact on the local community; and may encourage population transience. The policy does not seek to address this point or detail how this may be regulated managed though potential regulation across London

User: Exhibition Road Cultural Group

E10 Visitor Infrastructure

Welcome policy E10 to strengthen London's visitor economy and specifically that the special characteristics of major clusters of visitor attractions and the diversity of cultural infrastructure in all parts of London should be conserved, enhanced and promoted. South Kensington's cultural organisations are together a significant cluster of visitor attractions, attracting millions of Londoners, domestic and international tourists each year.

User: Imperial College London

The draft policy makes no distinction between higher education authorities trying to deliver accommodation for its students and schemes undertaken for profit by developers. Whilst it is appreciated that in land use terms it may be difficult for the London Plan to make a distinction, the reality is that funding resources are scarce and it is already difficult to provide the accommodation that students need.

Imperial College London supports the new requirement that purpose-built student accommodation must be operated by a higher education institution or a developer must have an undertaking for a specified higher education institution. However, it considers that the determination and provision of affordable student accommodation should rest with higher education institutions themselves, as they are best placed to take account of the allocation of the varying rents and costs that are applied across a significant portfolio (over 3500 beds in Imperial's case), in order to ensure that provision of student accommodation is financially sustainable in perpetuity. Imperial College London and other universities already offer a range of financial measures to help those in need. As such, Imperial College London objects to the requirement for 35% of student bedrooms in purpose built student accommodation provided in a development to be affordable. It should be noted that the provision of student accommodation is of benefit in itself. Not only does it help to attract the best students from around the world, which has a longer term benefit for Imperial College London and the UK, but purpose built student accommodation that satisfies this specialist area of housing need, also frees up more traditional housing stock that would otherwise be occupied by students, thereby providing additional homes for others.

Imperial College London also requests that the draft wording in paragraph 4.17.12 is amended. It rightly says that boroughs should consider allowing the temporary use of student accommodation during vacation periods for ancillary uses and gives the example of providing accommodation for conference delegates or summer students. It is not always possible to fill student accommodation from these sources alone. Imperial College London therefore requests that the wording be expanded to include general short term lets. This would ensure best use is made of all accommodation, rather than it lying empty for long periods of time. This would accord with Policy E10 paragraph 6.10.4, where it is acknowledged that "the use of student halls as visitor accommodation during university vacation periods can help meet seasonal fluctuations in demand." This would also serve to assist in keeping short term let provision away from the supply of conventional housing and minimise impacts on traditionally residential areas, by increasing the supply of an ideally-suited form of accommodation for short term lets at times which will not compromise the academic calendar.

User: DTZ Investors

Scope of the London Plan and deviation from National Planning Policy

General concern is raised that with respect to the admission in the “Introducing the Plan” section that “the Plan deviates from existing national policy and guidance” on the basis that “the Plan is delivering on a specific Mayoral commitment”. It is a fundamental requirement for the London Plan to be consistent with National Planning Policy with Section 337(6)(a) of The Greater London Authority Act 1999 as the Secretary of State has the power to impose a direction to the Mayor of London not publish the London Plan if there is “any inconsistency with current national policies or relevant regional planning guidance”.

In this context, further concern is expressed that the Draft London Plan contains policies that are too detailed and overly prescriptive for a document which is to comprise the Spatial Development Strategy for London and is required by law (under Part VIII, Section 334 of The Greater London Authority Act 1999) to ‘deal only with matters which are of strategic importance to Greater London’.

In this context, particular concern is raised in respect the policies which set out requirements for design scrutiny (Policy D2); detailed internal space standards for housing and hotels (Policies D4 and E10); requirements for hot food takeaways (Policy E9) and temporary/’meanwhile’ uses (Policy H4), as containing a level of detail which goes far beyond the remit for the London Plan, which should addressed by local planning policies and supplementary planning guidance as appropriate, to meet individual boroughs’ needs and requirements. These policies in particular should be deleted or amended to ensure the emerging London Plan accords with the requirements of The Greater London Authority Act 1999.

User:	London Borough of Ealing
The Council supports this policy.	

User: Historic England

This policy directly links to Good Growth policy GG5. Although principally about the infrastructure supporting London's visitor economy, the policy would benefit from a direct reference, in part B, to London's heritage.

We support the principle in para 6.10.1 of promoting tourism more widely across London. It will be important to consider how the diversity of London's heritage assets can assist with this.

We recommend part B is amended to:

'The special characteristics of major clusters of visitor attractions, and the diversity of **cultural and heritage assets across** London should be conserved, enhanced and promoted.

Please refer to our related comments on policies S7, HC2 and SI14.

User:	Unknown

Our client supports this policy in particular criterion B. which states “the special characteristics of major clusters of visitor attractions and the diversity of cultural infrastructure in all parts of London should be conserved, enhanced and promoted”. Our client’s site currently provides extensive visitor attractions and is increasing this provision through mean time and permanent uses whilst providing the necessary infrastructure to improve the site as a visitor destination.

User:	London Borough of Camden

The objectives of this policy are supported. However, Camden does not support permanent conversion of existing homes to short-stay accommodation intended for occupation for periods of less than 90 days.

The policy requirement for wheelchair accessible rooms should also state in what circumstances and to what size schemes it should apply. It may be viable or appropriate for proposals involving change of uses to existing buildings to implement these requirements.

User: Chessington World of Adventures

Visitor Infrastructure

CWoAR welcomes the support in policy E10(A) for the strengthening of London's visitor economy, and the enhancement and extension of its attractions. The delivery of apart-hotels, short-term lets and serviced accommodation that is promoted in E10(E) and (F) is supported by CWoAR. Specific policy support should also be included however for the development of visitor accommodation in Outer London, where this is directly related to existing tourist destinations.

Suggested policy wording

[bold *= suggested additions]*

E. In outer London and those parts of inner London outside the CAZ, serviced accommodation should be promoted in town centres and within Opportunity Areas where they are well-connected by public transport, particularly to central London. **Serviced accommodation should also be promoted where it is directly related to existing major visitor destinations of sub-regional or greater significance where there is a clear link in scale, nature and location between the proposed accommodation and the attraction being served.**

User:	Chessington World of Adventures

Lichfields' Commentary

CWoAR welcomes the supporting text at paragraph 6.10.1 ofthe draft London Plan, which reflects the Mayor's ambition to spread economic and regeneration benefits and to promote tourism across the whole of the city, including outside Central London. Indeed, Outer London boroughs can make a significant contribution to the visitor economy of London.

RBK for example benefits from a mix of historic and modern attractions, including its location close to the River Thames, Hampton Court and Richmond Park, and a long history of Royal connections. CWoAR represents a long-established tourist destination in the Chessington area of RBK, and makes a significant contribution to the value of the tourist economy in RBK.

User: Chessington World of Adventures

The recognition, in paragraph 6.10.2 of the draft London Plan, of the significant accommodation demands of tourists is also welcomed. The requirement to deliver an additional 58,ooo bedrooms of serviced accommodation by 2041 will require a pragmatic approach to the location of new accommodation, and will need to be responsive to local needs and circumstances. Consumer demands and expectations of leisure and tourism attractions are evolving. These are being influenced by visitor experiences abroad where the likes of Disney and Paramount are able to accommodate guests on site for extended periods, to enable visitors to fully immerse themselves in the experience of the themed areas and attractions on offer. American and European theme parks incorporated accommodation at an early stage of their development whereas UK theme parks are a late entrant in supplying on-site, highly-themed, bespoke accommodation.

The growth of the short break market in the UK over about 20 years - which is now a firmly established part of the tourism industry - has been significant and has influenced investment strategies in leisure and theme park attractions. There has been a rapid rise in the 'staycation' market since 2010.

This 'short break' phenomena and tourists experience of theme parks abroad have raised the expectations of guests wanting a choice of different types of options to undertake a short break and often in a unique, or different type of accommodation. This makes a short break 'special'.

Merlin's business strategy to diversify and reinforce its theme parks as resorts, by the range of accommodation offered over recent years, has meant that it has been able to increase its share of the short breaks market, thus ensuring the resorts achieve two or more visits from the same guest. This strategy is also enabling it to create a novel experience for its guests that is not offered (and cannot be replicated) elsewhere. The design ('theming') and family focus creates unique accommodation that interacts with, and supports the wider resorts, enhancing its overall attractiveness to visitors and contributing to its success.

In this regard, further recognition should be included in the draft London Plan of where new accommodation might be feasible at existing visitor destinations of sub-regional or greater significance.

Policy E11 Skills and opportunities for all

User: Mr Peter Eversden MBE

Policy E11 is not as comprehensive as the policy on this subject in the current London Plan (FALP) Policy 4.12 which covers reducing the need for long distance commuting, building on higher education institutions, tackling the cost and availability of childcare, addressing labour market discrimination and the mismatch between labour supply and demand in terms of education, skills or other barriers to success in a changing economy, focusing particularly on key target groups and communities living within London's most disadvantaged areas. Also, ensuring that an adequate mix of businesses and public services (and therefore employment opportunities) are provided close to those communities who particularly benefit from local jobs. Cross references were given to key parts of the Economic Development Strategy for getting people into work.

Policy E11 should be enhanced with such policies or the current momentum will be lost.

User:	Ms Sandra McLeod

Lobby and campaign for a ALL schools and communities in the greater London area to be educated in sustainable liveing and mitigating climate change.

User:	London Food LInk /Sustain

This is a reasonable and worthwhile policy, but it would be helpful to list skills that would contribute to a low carbon and sustainable economy, and that would be available to deprived areas and vulnerable people. Such a list should include gardening, marketing, cooking and serving healthy food.

User: London Forum of Amenity and Civic Societies

Policy E11 is not as comprehensive as the policy on this subject in the current consolidated London Plan, which, in its Policy 4.12, covers reducing the need for long-distance commuting, building on higher-education institutions, tackling the cost and availability of childcare, addressing labour market discrimination and the mismatch between labour supply and demand in terms of education, skills or other barriers to success in a changing economy, focusing particularly on key target groups and communities living within London's most disadvantaged areas. Also, ensuring that an adequate mix of businesses and public services (and therefore employment opportunities) are provided close to those communities who particularly benefit from local jobs. Cross references were given to key parts of the Economic Development Strategy for getting people into work.

Policy E11 should be enhanced with such policies or the current momentum will be lost.

User: Ms Meenakshi Sharma

B

1. Development proposals should seek to support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases, including through Section 106 obligations where appropriate. Boroughs should ensure these are implemented in ways that (a) enable trainees to complete their training and apprenticeships, (b) ensure the greatest level of take-up possible by Londoners of the training, apprenticeship and employment opportunities created and (c) increase the proportion of under-represented groups within the construction industry workforce. In partnership with the Mayor, boroughs are encouraged to consider cross-borough working to open up opportunities, including those created via Section 106 obligations, on a reciprocal basis, to residents from adjacent boroughs and across London.

To actually do something concrete about inequality within London, these apprenticeships, should be focused on the young people of the OA particularly if they are in the poorer wards. The Mayor should include a policy that there needs to be a joined up effort to do this with the schools in the area and the developers. He should take an audit of how many apprenticeships have been taken up by local people in the last 10 years and how many in the poorer wards.

User: Association of Licensed Multiple Retailers

The vote to leave the European Union is already being felt by hospitality business that are struggling for staff. A report for the British Hospitality Association by KPMG last year showed that service lines in London, such as hotels, employ large numbers of EU nationals, with 22.1% - 34.1% of their staff coming from EU member states. Between 13.8% - 26.1% of London restaurant staff are EU nationals. Within these businesses, roles including waiters and waitresses (75.3% EU nationals), chefs (24.6% EU nationals) and housekeeping staff (37.1% EU nationals) are even more reliant on the availability of EU labour.

UKHospitality has campaigned for improved technical education to alleviate the skills gap the hospitality industry faces, particularly in in the wake of declining European immigration following the decision to leave the European Union. To this end UKHospitality has lobbiedthe government to bring forward the introduction of a T-Level for hospitality as currently it is scheduled to begin in 2022, after the UK has left the EU and too late to help with a skills shortage that is affecting business already.

As such, a renewed focus on technical education and skills cannot come soon enough for the hospitality industry in London.

User: UKHospitality

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As such, a renewed focus on technical education and skills cannot come soon enough for the hospitality industry in London.

User: London Borough of Hammersmith and Fulham

Policy E11 Skills and opportunities for all

We agree with the ambition of this policy to develop an effective and responsive skills system through the Skills for Londoners Taskforce. The overall objective will be to equip Londoners with the skills that employers require and give them access to jobs and other opportunities that will enable them to contribute to London's economy. The intention of this policy is to address low pay in work and to create apprenticeships and other education and training initiatives which will especially tackle youth unemployment and will give Londoners as a whole better opportunities of securing work across several sectors.

The move towards greater focus on completion, quality and sustainability of any opportunities created via s106 processes is very welcome as often agreements are more concerned with volume and miss on meaningful collaboration with developers and their supply chains to enable sustainable positive impact on local communities; it is also encouraging to see that cross-borough working and the sharing of apprenticeship opportunities (depending on the type of development and the length of build), is also included as very often this is a barrier to completing apprenticeships and skills opportunities if limited to one site in a particular borough. We would like to see more 2-year apprenticeships at levels 3 & 4 in both construction and non- construction, linked to employment opportunities with contractors working on other sites in London. With the already chronic skills shortage in London that could potentially worsen with the advent of Brexit. Developers and contractors should work with boroughs to evolve systems of retention for qualified apprentices. There should be strong policy encouragement of local procurement opportunities from developments especially where SMEs are concerned.

User:	Inclusive Design and Access Panel

- E11 - A, Support but this could be more specific to include access for disabled people.

User:	Home Builders Federation

We support this policy. It is helpful that the policy is not too prescriptive about how S106 obligations are used to support construction skills.

User:	Galliard Homes

As mentioned, Galliard is London’s largest privately owned developer, who employs 700 fulltime staff from across the capital. Our employees aren’t from one specific authority, but from across many of the Boroughs. Some will work on sites or offices close to home, whilst others travel from site-to-site depending on their skill set or trade. Therefore Galliard support the Plans acknowledgement within Policy E11 – Skills and opportunities for all, that cross-Borough working to open up employment opportunities needs fuller recognition by the authorities, on a reciprocal basis.

User:	PCS Trade Union

A) It is important to situate this section within the principles of a Just Transition and how the Mayor can help workers transition to a new zero carbon economy.

B) As above but should add that trainees and apprenticeships should be assured of sustainable long term future work not just for the duration of a building project for example (as noted in 6.11.3). That apprenticeships are paid, and provided with relevant skills such as in low-carbon/eco construction to Passivhaus standards, and new energy workers with rounded skills to deal with renewable energy, retrofitting etc rather than a specific energy type.

User:	City of London Corporation

The City Corporation supports the strategic approach to the provision of training and skills initiatives and the use of s106 obligations to deliver such initiatives. The City of London Local Plan already provides a framework for using s106 obligations for this purpose.

User:	London Borough of Barnet

We support the increased focus given to and inclusion of over-arching good growth policies emphasising the need for planning and development to ensure delivery of strong and inclusive communities founded on openness, diversity and equality and reduce health inequalities.

User: London Assembly Labour Group

Suggested changes

“and the gender pay gap” added to E11A which now reads “The Mayor will work with strategic partners to address low pay and the gender pay gap and, supported by his Skills for Londoners Taskforce, co-ordinate national, regional and local initiatives to promote inclusive access to training, skills and employment opportunities for all Londoners”

Justification for policy recommendations

The gender pay gap, workplace sexism and the glass ceiling mean that women, and doubly for women from a black and ethnic minority background, are more likely to be in low-paid jobs and poverty. Both low-pay and poverty lead to bad health outcomes and constitute a health inequality. Despite the Equal Pay Act in 1970, women still earn less than men in Britain today and the gender pay gap in London is currently 22% (16.8% median), an increase on last year’s 21.8% (16.1% median). Nationally, the figure is 17.4%. The full-time pay gap in London is 20.7% and part-time is 1.3%.

User: London Assembly Planning Committee

Recommendations Policy E11 B should be amended in section c that refers to increasing under-represented groups in the construction industry. The specific potential of offsite manufactured homes as a source of employment for under-represented groups in construction should be made explicit.

7.32 The Planning Committee’s report on offsite manufactured housing (OSM) has identified that moving production from the construction site inside to a factory environment has many other benefits, especially in attracting a new demographic to the industry and diversifying the workforce.[64]
"The stereotypical image of the construction workplace is pretty unappealing to younger generations: hard labour, bad weather, noise and dirt, limited opportunities to broaden experience and progress […] While this might not be the reality, there is at least a grain of truth to it. So, it's hardly surprising we've got a skills issue."[65]

7.33 Being able to offer professional careers in a permanent place of work should help the industry attract a broader pool of talent - especially women and young people.

7.34 OSM housing opens up a wide range of STEM employment opportunities, specifically to groups that have not been attracted to traditional construction work, such as women, and across a whole range of skill levels, which should be more attractive to young people in a way that differs from 'traditional' house building. There is potential for demand for homes to fuel employment opportunities in the rest of the country. London's demand for homes could stimulate job growth and rebalance the national economy. This is something the Mayor may wish to discuss with Government for London to play a leading role in an emerging national industrial strategy.

User:	London Borough of Lambeth

Lambeth supports this approach, which is consistent with its recently adopted Employment and Skills SPD. However, please see comments about prioritisation of planning obligations under policy DF1.

User:	University of the Arts London

The emphasis on addressing issues of low pay and promoting inclusive access to training, skills and employment opportunities is welcome. In its thinking about issues of inclusive growth and sector skills needs, the GLA should formally recognize the importance of individuals acquiring role or sector-specific competencies and knowledge. These are just as much of a requirement as skills in growth areas of the economy. Different industry sectors may require different specialist training and education models (beyond apprenticeships) to deliver such opportunities. Universities are well placed to develop such specialist training content, frameworks and delivery models. Fiscal devolution, and specifically the Adult Skills Budget, present opportunities to support targeted sector-specific programmes of training and development.

User: London Tenants Federation

6.11.1 Policy E11 Skills and Opportunities for all

This policy should be the focus of this chapter. It should, however, be far more developed in terms of how the draft policies will support in addressing the specific key issues highlighted in paragraph 6.11.1 – alongside the setting targets around achieving positive change.

User:	London Borough of Haringey
Haringey fully supports the Skills and Opportunities for All policy.	

User:	London Borough of Barking & Dagenham

The draft London Plan’s approach to skills and opportunities for all should go further to ensure good growth becomes an outcome of development and not just an ambition. The policy on skills, set out in E11 skills and opportunities for all restricts itself to seeking to support employment skills opportunities and other education/ training opportunities in both construction and end-use phases. Given the Mayor’s commitment to good growth the policy should go further. First, when it comes to construction the policy should set out a percentage of those working on the construction to live locally. Second the policy, should go further into how end-use phases could pragmatically be delivered. This policy needs to be expanded and be wider connected to the ‘good growth’ agenda set out in chapter one.

User:	London Borough of Lewisham

In addition to employment, skills development, apprenticeships etc development proposals should also seek to support London based SMEs. With 1/5 of all SMEs (FSB) operating in the construction sector, it is important to consider and capture the contribution made to employment, apprenticeship and London Living Wage outcomes by SMEs (including addressing low pay). Development proposals should secure opportunities across a wider spectrum of stages outside of construction and end use. Concept/Developed design stage should be considered.

User:	London Borough of Brent
The Council supports the policy.	

User:	London Borough of Bromley

The increased focus in the new London Plan on supporting local employment and skills development through various planning mechanisms is noted.

User: Save Swiss Cottage

Policy E11 Skills and Opportunities for all
Such a policy should be the focus of this chapter. It should, however, be far more developed in terms of how the draft policies will support in addressing the specific key issues highlighted in paragraph 6.11.1 – alongside the setting targets around achieving positive change.

Policy E8 Sector, growth opportunities and clusters
We are concerned that much of this policy is aimed at ‘people like us’ (i.e. those developing the policy) rather than seriously considering how policy may address the issues highlighted in the text of E11 – particularly for exiting lower income households that are unemployed or are in in-work poverty and young people.

GG5 Growing a good economy
We fear that conserving and enhancing London’s global economy - generally ongoing growth of high end business, financial, professional, education and research; seeing London as the goose that lays the golden egg, is of little benefit to lower income households in the capital (as set out in Policy E11, paragraph 6.11.1), but also to and to the economy of areas in other parts of the country.

Chapter 6

This chapter adds to our concerns that the draft London Plan policy principally benefits those at the top end (by income) at the expense of those with below median income levels.

Policy E11 text, paragraph 6.11.1 expresses precisely the problems: London apparently has a strong global economy, yet its employment rates have lagged behind the rest of the country for three decades. It has particularly high rates of youth unemployment and increasing levels of in-work poverty.
Social / affordable rent tenants and those living in more expensive private rented housing who really can only afford social-rented homes, necessarily suffer most.

Policy E1 – Offices
Competitiveness of office space is promoted and increases in stock encouraged, as are apparent ‘unique agglomerations and dynamic clusters of world city businesses and other specialist functions’. It is very difficult to see how this will impact positively on the points highlighted above from the supporting text of policy E11.

There is also a fair amount of office space owned by the public sector (which is more likely to employ people from households with lower and middle incomes) yet seemingly not ‘competitive’. The Mayor, however sees these (as set out in the London Housing Strategy) simply as opportunities to sell off for housing development.

User: London Councils

This policy is a welcome call for greater cross-borough working on coordinating training and apprenticeship S106 obligations, creating a more uniform approach to the drafting S106s across the capital to help deliver more successful employment outcomes. We welcome this, and argue that employment and training targets should focus less on the number of training starts and more on long terms goals such as job outcomes. However, we feel strongly that this should be a borough-led project, supported by the GLA.

The findings of the construction skills and employment research report submitted to the Homes for Londoners board should be recognised by the GLA and boroughs, and form part of future policy where suitable.

User:	London Borough of Tower Hamlets

The general premise of the policy is supported, although cross borough working on employment and entertainment opportunities should be reworded to recognise local circumstances. For example, LBTH has high levels of growth and employment opportunities, however local employment rates are lower than London average - it is therefore important that local people are prioritised for local opportunities. However it is recognised that other boroughs may be in a better position to widen access to their opportunities.

User:	Royal Borough of Kingston
Support.	

User:	London Borough of Hillingdon
The issue of low pay is not a planning matter and should not be included in the draft plan.	

User: HFFTRA

Policy E11 Skills and Opportunities for all

Such a policy should be the focus of this chapter. It should, however, be far more developed in terms of how the draft policies will support in addressing the specific key issues highlighted in paragraph 6.11.1 – alongside the setting targets around achieving positive change.

User:	London Borough of Merton

Support The Policy aims to promote inclusive access to training, skills and employment opportunities for all Londoners are supported. The opportunities that the policy provides to increase the proportion of underrepresented groups within the construction industry workforce is particularly welcomed.

User:	London Borough of Hounslow

LB Hounslow supports the intention in the draft London Plan, through policy E11, to develop an effective and responsive skills system through the Skills for Londoners Programme. In particular, we welcome the intent to work across borough boundaries to coordinate activity, share data, and to develop a more consistent approach to making use of S106 funding to deliver a skills system that London and Londoners need.

User:	Westminster City Council
We support this policy.	

User: London Borough of Southwark

This policy is supported and consistent with Southwark's ambitious policies and programmes for construction and other skills development.

The council supports the aim of getting more people into construction employment across London and thinking innovatively about how to achieve this. The proposed sharing of S106 opportunities across borough boundaries has potential to open up mobility in accessing opportunities in construction across London and the council remains committed to supporting cross-borough work.

However it is also recognised among boroughs that further measures to address the supply of skilled labour are urgently needed as a priority to properly address the challenges employers face. There is no surplus of construction skills in one part of London that needs distributing more evenly, without a focus on improving numbers entering the sector and accessing skills, the approach proposed in Part B risks simply rearranging the existing shortage of labour supply.

Improving the supply of skills is the central issue facing the construction sector. The council would encourage every effort to explore how the Mayor can improve intelligence, coordination and quality of construction skills provision. The council would welcome the opportunity to be part of this conversation and share learning from developing the Southwark Construction Skills Centre.

Given the strength of Southwark’s current local arrangements, there are a number of potential implications in the policy as currently proposed that require further consideration. These are:

- The potential for levelling down of s106 policy and delivery models, which are strong (and strongly enforced) in Southwark.
- Implications for supporting unemployed Southwark residents into sustained construction work, which is relatively successful under existing arrangements.
- Resourcing implications related to s106 financial contributions.

Before Part B of the policy is adopted in the London Plan in its current form, the council suggests further work be undertaken to test these complexities, demonstrate benefits and avoid disadvantage to any authority or other unplanned consequences.

User: London Borough of Wandsworth

The Council welcomes the Plan's support that developments should seek to maximise training and employment opportunities, including through S106 agreements. Wandsworth has sought to address the concerns raised in this chapter through an Employment and Skills Plan process that allows specific opportunities to be aligned with build programmes and employer practices to maximise benefit for both employer and individual.

It should be noted that S106 obligations are the responsibility of the landowner and therefore responsibility for training and apprenticeship completions lie with them (or through them with their supply chain). Employment and training practice in the construction industry has not been of a consistent quality and can sometimes fall short of the aspirations the Council has for its residents. However, the Council recognises that successful S106 Employment Agreements must contain sufficient flexibility to align with industry practice and employment needs and welcomes the GLA's strategic level work with the industry to improve the development of the London workforce.

Wandsworth has been instrumental in developing a crossborough approach in Employment Agreements, first with LB Lambeth for developments in VNEB and then with Central London Forward through its Construction Careers initiatives. Further support to allow such cross borough working to be reflected in S106 agreements would be supported, whilst recognising the legal basis of mitigating the impacts of local development.

Although the Plan's focus on the employment and skills opportunities through development is welcome, this chapter feels somewhat limited as a response to the wider employment and skills agenda. For example, the importance of providing a range of training facilities, ranging from specialist facilities supporting London or subregional strategies to smaller local facilities, accessible to those who may be further away from the labour market.

User: London Borough of Richmond Upon Thames

General support for Policy E11, although some concerns are raised with regard to the implementation and monitoring of this policy, which could have significant resource implications for the boroughs.

The problem of short term projects versus longerterm commitment to the completion of apprenticeships seems fundamental and there would be merit in clarifying what is meant by ‘completions’ in this context. Apprenticeships are usually a single qualification based on a single period of learning and this proposition would support more modular apprenticeships which could be delivered by multiple employers, with the trainee addressing a range of core skills with different employers on different projects and still reach a completion.

The proposals are limited in scope, not recognising the increased influence the Mayor will have with devolution of the Adult Education Budget from 2019 and the joined up working that is happening with the Council and RHACC and Richmond upon Thames College in particular, and the subregional work.

User:	London Borough of Harrow

Harrow fully supports the Skills and Opportunities for All policy. If workless and unskilled Londoners are to benefit from the employment and training opportunities generated by construction then developers need to pay a contribution towards the local implementation of job brokerage and training provision. This will include local schemes that deliver community outreach, provide careers advice and action planning, arrange training, work placements and employment for jobseekers and provide pastoral support to help clients stay in work. Apprenticeships are essential to developing a skilled workforce, however it is also essential to provide upskilling opportunities in a number of short focused industry recognized training courses

User:	London Borough of Havering

Havering very strongly supports development proposals being used to seek employment and skills development, apprenticeships and other education and training opportunities during construction and at the end phase. The potential advantages arising from cross borough arrangements are noted but the London Plan should acknowledge that boroughs will inevitably wish to seek to retain the best opportunities for their own residents.

Paragraph 6.11.1

The draft London Plan should afford priority to boroughs where there are examples of generationally-inherited higher rates of low-skilled low-paid work.

User: Just Space

Policy E11 Skills and opportunities for all

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

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

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

Proposed changes:

Add new points:

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

User: TUC London, South East and East of England

Policy E11: Skills and opportunities for all

1. The TUC in London welcomes the Mayor's commitment to seek to address low pay and access to skills and learning improvement for all those who live and work in London. Trade unions, through our government funded 'Unionlearn' programme are major partners in providing access to skills, especially for those who do not have strong qualification. And we support apprentices in the workplace.
2. With reference to point B; the London regional TUC has been arguing for 20 years that the potential employment and skills uplift from regeneration schemes and infrastructure investments has consistently been largely wasted and that the skills and employment outcomes should regarded to be main outcomes and part of the tender process, and not ancillary 'bolt-on' or supplementary outcomes, that are generally lost and forgotten about. The commitment made in point B is welcome, but it should be made mandatory to developments whenever possible, especially larger projects.

User:	Heart of London Business Alliance

A large portion of the UK’s construction workforce is EU citizens, and Brexit harm the future of the industry. The GLA should ensure that the London Plan is aligned with the Skills Strategy. We are supportive of the approach laid out in Policy E11: Skills and opportunities for all, particularly the need for training and apprenticeship opportunities to be coordinated to ensure they are completed.

User:	Federation of Small Businesses

Development proposals seeking to support skills development and apprenticeships must be considered with small builders/businesses in mind. They will want to sub-contract and benefit from the skills in the supply chain that might be out of their reach as a result of high costs of training/taking on an apprentice. We should use the procurement system to support the supply chain.

User:	London Healthier Places

Good employment is a protective factor for both physical and mental health. This policy is supported and will require development proposals to seek to support employment, skills development, apprenticeships and other education opportunities for all. Training should be inclusive and of a high quality.

User: SEGRO

We support the Mayor’s ambition to address low pay and the plan to coordinate national, regional and local initiative to promote inclusive access to training, skills and employment opportunities for all Londoners.

We support the Mayor’s recommendation of increased cross-borough working, co-ordination and sharing of data on employment and training opportunities, together with a more uniform approach to the drafting of Section 106 obligations across the capital to deliver more successful employment outcomes.

Flexibility should be built into s106 agreements to account for variations in the local skills pools and for the distinctive nature of industrial construction. A consistent formula for calculating s106 contributions across all boroughs would ensure uniformity and ease the planning process and result in a more efficient path to job creation and investment in the London economy.

Local authorities apply the same formula in calculating the s106 contribution for residential and industrial developments. This is highly problematic for the following reasons as the construction methods are so very different. Industrial development adopts a fast track construction method, which means that most of the building (steel frame and cladding) is pre-fabricated off site. This reduces the number of construction workers on-site to a small number of highly specialised operators, which is different when compared to a residential scheme which may have many bricklayers, carpenters, etc. on site at any one time. Industrial schemes are also quicker to build and, irrespective of size, typically take 42 weeks to construct. Again very different to the longer build process for residential schemes.

As a consequence, to support construction apprentices on an industrial scheme is very challenging, especially as they require a minimum of 12 months experience in a single trade. We strongly urge the Mayor to devise an alternative s106 guidance suited to industrial developments that give greater weighting to end user employment opportunities to prevent barriers to London’s growth. We would be supportive of a London wide cross-borough industrial construction shared apprenticeship scheme to meet the needs of s106 obligations on a reciprocal basis.

Businesses are ideally placed to identify skills and training gaps. We recommend increased engagement with employer representative bodies to improve and align skills provision in the capital to meet occupational skills need. This can be informed through an annual ‘skills audit’. We support greater engagement with employers to provide advice and guidance on the implementation of the new ‘Technical Levels’.

We are supportive of the Apprenticeship Levy, but it is clear that more needs to be done to ensure that businesses use it to its full potential. We are supportive of devolvement and transfer of the Levy between businesses to ensure that it works for local economic needs.

The increase the proportion of under-represented groups within the construction industry workforce is an issue that is important to us and request more intervention is required in this area.

The demand for ESOL provision outstrips supply. An inadequate grasp of the English language is a major barrier to accessing employment and training opportunity. We believe that increased affordable or free provision would remove a barrier to accessing work and training to under-represented groups in London.

User: British Takeaway Campaign

The BTC welcomes the focus within the draft London Plan to develop Londoners' skills, as this will be crucial to supporting the future success of the sector. The takeaway industry supports more than 23,000 jobs in London, and offers a valuable career path for budding entrepreneurs – many of whom go on to run successful businesses and chains. For example, BTC Chair Ibrahim Dogus climbed the ranks of the takeaway industry before setting up multiple Turkish restaurants across London.

Whilst employment within the sector is set to rise over the next five years, demand for employees is expected to exceed supply. Our research shows that already, 23% of takeaway restaurants are unable to recruit the staff they need to run their business. These shortages are felt most acutely in skilled kitchen roles, where 78% of those reporting problems have had issues recruiting chefs, particularly in curry and sushi making roles, while 37% believe Brexit will make recruitment harder.

The draft London Plan should therefore go beyond Higher Education to include Further Education providers which are well placed to upskill Londoners at an earlier and more accessible stage. The introduction of the Government's new technical education qualifications (T levels) is a welcome development. We are proud to be working with the Department for Education to shape the Catering and Hospitality T level for 16 to 18 year olds so that the syllabus meets the needs of the industry, by ensuring that compulsory components in shortage cuisines like fish frying and curry preparation and seasoning, as well as on hygiene, nutrition and sustainability, are included.

Just Eat is also partnering with skills and training charity, Springboard, on a new initiative – the Just Eat Skills Kitchen – which aims to help restaurants fill skills gaps and inspire young people about the career opportunities available within the independent restaurant – from kitchen to front of house, supporting the Government's vocational education agenda.

Ultimately, the BTC believes that the Skills for Londoners Taskforce presents an opportunity to incorporate the hospitality industry, and we would welcome further discussions with the Greater London Authority on how we could collaborate to provide high quality skills development in the takeaway sector.

User: SEGRO

Appendix – SEGRO Proposed Policy Amendments to the Draft London Plan

Policy E11 Skills and opportunities for all

A The Mayor will work with strategic partners to address low pay and, supported by his Skills for Londoners Taskforce, co-ordinate national, regional and local initiatives to promote inclusive access to training, skills and employment opportunities for all Londoners.

B Development proposals should seek to support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases, including through Section 106 obligations where appropriate. Boroughs should ensure **they fully understand and respond to the construction methods used by different real estate sectors to *[DELETE: these are implemented in]* implement flexible** ways that (a) enable trainees to complete their training and apprenticeships, (b) ensure the greatest level of take-up possible by Londoners of the training, apprenticeship and employment opportunities created and (c) increase the proportion of under-represented groups within the construction industry workforce. In partnership with the Mayor, boroughs are encouraged to consider cross-borough working to open up opportunities, including those created via Section 106 obligations, on a reciprocal basis, to residents from adjacent boroughs and across London.

User: West London Alliance

The WLA supports the intention in the draft London Plan, through policy E11, to develop an effective and responsive skills system through the Skills for Londoners Programme. In particular we welcome the intent to work across borough boundaries to coordinate activity, share data, and to develop a more consistent approach to making use of S105 funding to deliver a skills system that London and Londoners need.

The WLA has been working with the GLA and Skills for Londoners for some time, and have recently approved the West London Skills, Employment and Productivity Strategy that aligns fully with the London approach and priorities.

We also welcome the intention in the draft London Plan to work across boroughs to share data with a view to developing a more joined up approach to S106, particularly at the sub regional level.

KEY ASK 8: West London boroughs would welcome ongoing engagement with Skills for Londoners, particularly in relation to the development of a more uniform approach to making use of Section 106 monies from the construction sector.

User: Construction Products Association

1. The process of incorporating employment, skills development, apprenticeships, and other education and training opportunities into Section 106 obligations needs to be streamlined to prevent cases of construction projects completing before training qualifications have been gained, or new projects with Section 106 agreements in a different borough preventing previous apprentices from continuing their training.

2. Targets for apprenticeship starts, rather than completions may also hinder both the monitoring and progression of skills training programmes.

3. A wide-ranging skills strategy is required to deliver the construction of London's housing, commercial, infrastructure, industrial and public buildings and facilities. The CPA's Construction Trade Survey shows that building contractors across Great Britain have reported difficulties in the recruitment of on-site trades, particularly in housing, since activity accelerated in 2014. Over this period, on average 68% of contractors reported difficulties in recruiting bricklayers, 59% in the hiring of carpenters/joiners and 48% in the recruitment of plasterers. With skills shortages already apparent, gaps in labour supply are only likely to intensify under a plan to sharply increase house building.

Refer graph: Building Contractors' Difficulty Recruiting Site Trades – Page 5 of rep

4. There is currently uncertainty over the implementation of cross-border labour flows post- Brexit. The Home Builders Federation's (HBF) Workforce Census highlights the large proportion of overseas workers on house building sites in London. In 2017, 56.3% of the workforce was from outside the UK – broken down into 49.5% from the EU and 6.8% from the rest of the world. Potential restrictions on hiring EU workers will impose a cost on firms organising work permits, document checks and visas. This is pertinent given that the burden will fall on SMEs, who represent over three-quarters of construction employment.

Refer graph: Overseas workers as percentage of regional home building workforces – Page 5 of rep

5. Any restrictions on future EU labour migration risks a potential shortfall in on-site construction workers and may also be deterring construction workers from moving to the UK, according to anecdotes from house builders. This is compounded by demographic issues in the UK construction workforce and the 500,000 workers in the industry that are set to retire in the next 5-10 years.

User: Chartered Institute of Architectural Technologists

Economy

Policies E1 to E11

We are in agreement with the proposals contained in the plan.

User:	New West End Company

We believe that the London Plan should give more guidance and consideration to :
? promotion of growth through softer infrastructure, such as training academies for the retail and leisure sectors.

User: Crest Nicholson PLC

We consider this Policy to be unsound and unrealistic as currently drafted and amendments are required.

Crest Nicholson are fully supportive of the need to ensure that skills development including apprenticeships and other training opportunities are brought forward. This is something Crest Nicholson is actively engaged in outside of the framework provided by planning policy. We also consider that completion of apprenticeships and training is important to ensure skills are secured and a new workforce is trained. We note the points made in explanatory text para 6.11.3 and agree that planning can place unnecessary and unintended restrictions. We do not consider that Policy E11 Part B addresses this concern and without direction London Boroughs may well impose unrealistic requirements based on the explanatory text. The text should be clear that Boroughs should await publication of additional guidance (as alluded to in paragraph 6.11.4) on how to deal with the concerns raised rather than seek to impose planning obligations or conditions on new development that may have unintended consequences and implications.

We also note the content of paragraph 6.11.4 -we consider a London wide approach should be taken in relation to this matter. Whilst we understand it is intended that the points made in paragraphs 6.11.3 and 6.11.4 will be investigated further, it would be possible to permit to draft policy to allow a developer to discharge one Borough’s apprenticeship requirements if that developer was already meeting similar requirements imposed in connection with another development where the earlier development would be completed during the period that the new development would be operational. As such apprentices etc requirements from the first scheme would roll over to the new scheme until those apprenticeships had been completed.

User:	Benhill Residents
Such a policy should be the focus of this chapter. It should, however, be far more developed in terms of how the draft policies will support in addressing the specific key issues highlighted in paragraph 6.11.1 – alongside the setting targets around achieving positive change.	

User:	Earls Court Public Sector Tenants' Assoc

Such a policy should be the focus of this chapter. It should, however, be far more developed in terms of how the draft policies will support in addressing the specific key issues highlighted in paragraph 6.11.1 – alongside the setting targets around achieving positive change.

User: Elaine Chambers

Policy E11 Skills and Opportunities for all

Such a policy should be the focus of this chapter. It should, however, be far more developed in terms of how the draft policies will support in addressing the specific key issues highlighted in paragraph 6.11.1 – alongside the setting targets around achieving positive change.

User: New Policy Institute

In B insert after “(a) enable trainees to complete their training and apprenticeships”
To a minimum recognised level of attainment

Add new paragraph C:
In consultation with employers and education and training specialists, the Mayor will publish minimum levels of attainment. Development proposals should be such that that those levels can feasibly be realised. Boroughs, singly or together, will work with developers and others to make this possible.

The skills development, apprenticeship and other education and training opportunities made possible by development proposals are only worthwhile if they allow those taking advantage of them to reach at least minimum acceptable standard. Para 6.11.3 notes that it is often not possible under current arrangements to acquire qualifications. With 35 per cent of 19-year-olds across inner and outer London lacking qualifications at level 3 (LPP, fig 10.4), the challenge is considerable.

With the Mayor setting the standard, boroughs will need to work with developers and others to find ways to ensure that these standards can be achieved. As the LPP (fig 10.6) also shows, there is a lot of variation between boroughs in the proportion of young adults lacking adequate qualifications.

User:	New Policy Institute

Add to 6.11.3 after “unable to complete their training”

In order to overcome this, the Mayor will, after consultation, set minimum standards so as to ensure that agreements do provide for meaningful completion, rather than mere starts.

User:	Orbit

Orbit fully endorses this policy as it will allow for a wider pool of candidates to be put forward and selected to work on construction projects and as part of the end-user stage. This will go some way to ensuring there is no skills shortage during the construction of developments and will open up job opportunities to candidates within neighbouring boroughs.

User:	PAFH - Physical Activity for Health (London Sport)

Volunteering plays a significant part of maintaining local sports clubs and teams. In London, those involved in sport and physical activity account for 50% of formal volunteering (NCVO UK Civil Society Almanac, 2015-16). We would therefore like to see the role of volunteering strengthened within this policy and that new developments seek to support local volunteering opportunities in the physical activity and sport sector.

User: London Borough of Newham

Policy E11 Skills and Opportunities

LBN are generally supportive of the policy which is complementary to Newham's Draft Revised Local Plan. However, LBN we disagree with the statement in paragraph 6.11.3: LBN never require an employer to dismiss an apprentice or any other staff member when they move to a site in the borough on the basis that the apprentice/staff member does not live in our Borough. We only ask that when new opportunities arise on the LBN site that the employer uses 'best endeavours' to fill that vacancy with a resident in the borough. There is never an expectation that employers will give someone a job because of their postcode. LBN would ask that employers place vacancies with Workplace to support local employment opportunities. It is also recommended that the word "trainee" is replaced with "those undertaking training and/or apprenticeships" as "trainee" can be misinterpreted to mean unpaid or very low skilled staff member (E11.B).

User: Heathrow Airport

Heathrow welcomes the commitment of the London Plan to providing skills and opportunities for all Londoners and stands ready to support the Mayor and his Skills for Londoners Taskforce wherever possible.

Heathrow is one of the largest single-site employers in the country, with over 76,000 people directly employed on-site. Our apprenticeship programme provides great career opportunities and demonstrates the value of vocational training. Investing in young people is already a core part of Heathrow's business with initiatives such as the Heathrow Academy and the Skills Taskforce. Today, more than half of the airport's engineering workforce come from Heathrow's own apprenticeship scheme.

With expansion, we are further enhancing our existing training and apprenticeship programmes, ensuring the benefits of a third runway are felt as widely as possible. The Heathrow Skills Taskforce, chaired by Lord Blunkett, is providing advice and guidance to Heathrow on how to successfully deliver the 10,000 apprenticeships needed to run and operate an expanded airport. Delivery of these apprenticeships will largely be through its supply chain and airport business community. We would welcome further discussions with your officers to explore where our apprenticeship schemes may support GLA initiatives.

User:	Alzheimer's Society

1. Policy **E11** Skills and opportunities for all identifies some ways that S.106 obligations and other mechanisms could be used in developments to help people back into work. We would encourage you to explicitly consider the needs of carers, who often struggle to find flexible working conditions if appropriate, and former carers coming back into the workforce. Dementia currently costs UK businesses an estimated £1.6bn[1], expected to rise to £3bn by 2030. Many of these costs are people leaving the workforce to care.

[1] https://cebr.com/reports/cost-of-dementia-to-business/

User:	London Borough of Ealing
The Council supports this policy.	

User: Middlesex University

Middlesex University strongly welcomes the focus on promoting inclusive access to training, skills and employment opportunities for all Londoners with support from the Skills for Londoners Taskforce. We believe that innovation and experiment based on evidence of ‘what works’ is needed here to development pathways in provision and appropriate skills outcomes of benefit to Londoners and London’s growth. The University is already engaged in shaping the Skills for Londoners Strategy as a member of the Taskforce Stakeholder Advisory Group and the All Age Careers Offer Task and Finish Group. The University has a key role to play here through its work in developing progression pathways, its outreach work to raise aspiration and attainment in schools and colleges and its innovative Make Your Mark project which provides high quality careers information and guidance to high school students and their parents/carers. We are also bidding to develop an Institute of Technology with the Capital City College Group to create opportunities for Londoners to progress to higher level learning in STEM subjects and into employment.

We stand ready to assist in shaping this approach, building on more than a decade of success in the field. For example, we are currently working with the West London Alliance (WLA), a collaboration between seven West London boroughs, Ealing, Hammersmith and West London College and West London employers, including London Heathrow, on a programme to improve outcomes for West London. The WLA is developing a sub-regional skills commissioning function to address the gap between the demand and supply of skills. The project aims to ensure that information about local skills needs is feeding through to education providers to inform their provision and to prospective students to guide their choices. This collaborative approach has the potential to help vulnerable local areas by targeting skills development provision on those areas to help prevent or reverse urban decline.

Middlesex is also promoting access to public sector professions through degree apprenticeships in London through its HEFCE funded Degree apprenticeship development project. This targets under-represented groups in London and seeks to demonstrate that professional careers as a Teacher, Police Constable, Registered Nurse and Social Worker can be accessed through degree apprenticeships.

In a variety of ways, then, universities like Middlesex can, we believe, shape a more effective and bespoke skills provision (as well as skills strategy) for London.

We think one specific proposal in the draft London Plan deserves particular commendation. The call to require developers to provide education and training opportunities through the Section 106 obligations where appropriate is a great opportunity to ensure that communities shape their own development through their own skills, and build those skills to enhance their own community's development. Middlesex is working with the Borough of Barnet to support the construction employers they contract with to meet these obligations, for example through our Construction Management degree apprenticeship programme. We want, though, to go further. We think a 'skills growth compact' between s.106 developers, the Mayor and universities could, at the higher education level, be productive of a pan-London programme of bespoke, tailored skills provision for the construction and environmental development and management sectors. We urge the Mayor to engage with universities like Middlesex to gain traction in this key area.

User:	Peabody

1. We support the Mayor’s ambition to increase skills. Peabody is working with partners in the London Borough of Bexley and London South East Colleges to deliver the Place and Making Institute, a world-leading learning, research, innovation and enterprise campus dedicated to place-making and design skills. We look forward to exploring this further with colleagues in the Greater London Authority.

User:	Berkeley Group

We support the approach for S106 agreements to enable trainees to complete their training and apprenticeships and for all Londoners to benefit from opportunities, including through cross-borough working (E11). London is highly accessible with many people living in one borough and working in another. This more pragmatic approach will ensure that the best is made of opportunities secured in development.

User:	Natural England

We recommend that this policy references expanding opportunities to develop skills for creating and maintaining green infrastructure, as would routinely be provided by development through emerging urban greening measures, in order to retain a high quality resource.

User: London Chamber of Commerce and Industry

Policy E11 Skills and opportunities for all

“Skills shortages have increased as an issue for firms as the economy has improved. Flexible immigration rules for businesses are essential as it will take years for these new learners to plug the skills gaps”

Pat Saini, Head of Immigration, Penningtons Manches LLP (LCCI Member)

77. We welcome the renewed focus on skills and the publication of the first dedicated city wide Skills for Londoners Strategy. LCCI will play an active role in contributing to a successful skills landscape in London, including through our new Work and Employment Policy Advisory Committee, our research work and polling, and our initiative which places member businesses into schools so that students are able to gain insights into the world of work.

78. In our Q4 2017 Quarterly Economic Survey (QES), the latest quarter for which we have results, highlighted the ongoing difficulties faced by companies looking for suitably skilled staff. Of those companies that said that they were recruiting, 57% reported difficulties finding people with the right skills to fill vacancies. This is the highest Capital 500 figure recorded to date.

79. These figures demonstrate why upgrading the capital’s domestic skills pipeline is imperative, especially at a time when businesses are facing uncertainty about their future access to migrant workers from overseas, both from within the European Union (EU) and further afield, in the context of ongoing Brexit negotiations.

80. LCCI considers it essential that the capital is able to draw upon both an effective and responsive skills and training system, and a flexible migration system.

81. Take up of apprenticeships in London is low, with just 8% of firms polled by our survey reporting that the employ an apprentice38. LCCI is a strong supporter of apprenticeships and welcomes the principle behind the Apprenticeship Levy. However, it is also clear to us that more needs to be done to make sure the levy works for businesses, particularly in the capital.

82. We welcome the intent within the draft new London Plan to address some of these challenges related to apprenticeships, noting particularly proposals to lobby for devolution of the Apprenticeship Levy. The Mayor rightly, in our view, believes this will enable greater flexibility to address the complex skills requirements of London businesses including by using the levy on a wider range of skills development areas to meet local economic needs.

83. We note also that the draft new London Plan also recognises the limitations that current Section 106 agreements can place on the use of apprenticeships. We welcome the Mayor’s commitment to encourage London boroughs to consider cross-borough working to open up opportunities - including those created via Section 106 obligations - to residents from adjacent boroughs and across London.

User: CIBSE

Apprenticeships are an essential part of ensuring highly-skilled construction workers are available to deliver objectives in terms of volume of construction but also, crucially, quality and sustainability.

We support and welcome the intent to encourage cross-Borough collaboration on this issue. Anecdotal but consistent feedback from construction professionals highlights that the common practice of linking apprenticeships to individual Boroughs can be overly restrictive for companies and individuals, limiting the
opportunities for apprenticeships.

User: Design Council

Skills

45. The Plan highlights an important challenge facing the planning, architecture and construction industry in London. The construction industry is one area of the economy exposed to future skills gaps and shortages with an ageing workforce[8] and high use of migrant labour.[9] New technologies, such as Building Information Modelling (BIM)[10] and entrants to the industry further underline the need for skills development within construction. Currently there is a shortage of these digital skills amongst the current construction workforce.[11]

46. Developments such as these are already forcing radical changes to the construction industry. BIM offers the potential to reduce the risk of errors and supports coordination as building design develops and moves into the construction phase. The UK is also witnessing developments in modular construction, off-site fabrication and smart homes with the use of biometric access and remote controls. This means that everyone involved within the built environment – from the architect to the labourer – has to develop new skills and knowledge.

47. The Mayor's proposals should therefore be developed further, to not only ensure local residents and under-represented groups are provided with good quality training that leads to sustainable employment, but should also ensure they are provided with the skills the industry will need in the future and which will also set them up for the long-term. Our analysis suggests that if successfully implemented, addressing skills gaps in the architecture and built environment sectors alone could add an extra £33m to London's economy.[12]

[8] The Chartered Institute of Building (2015) The Impact of the Ageing Population on the Construction Industry https://www.ciob.org/sites/default/files/CIOB%20research%20-%20The%20Impact%20of%20the%20Ageing%20Population%20on%20the%20Construction%20Industry_0.pdf
[9] 'Single market exit: UK construction "could lose 175,000 EU workers"' The Guardian 15 March 2017 https://www.theguardian.com/business/2017/mar/15/single-market-exit-brexit-uk-construction-sector-lose-175000-eu-workers
[10] BIM describes the process of designing a building collaboratively using a unified digital platform rather than separate sets of drawings.
[11] Farmer, M., (2016), The Farmer Review of the UK Construction Labour Model, http://www.constructionleadershipcouncil.co.uk/wp-content/uploads/2016/10/Farmer-Review.pdf

[12] Design Council, (2017), Designing a future economy, [online: https://www.designcouncil.org.uk/resources/report/designing-future-economy-report]

User: Mr Gary Hayes

Policy E11 Skills and Opportunities for all

Such a policy should be the focus of this chapter. It should, however, be far more developed in terms of how the draft policies will support in addressing the specific key issues highlighted in paragraph 6.11.1 – alongside the setting targets around achieving positive change.

User:	London City Airport

Policy E11 seeks to ensure that development proposals support employment and skills development in both the construction and end-use phases. The Airport is supportive of the Mayor's ambition to address low pay and promote inclusive access to training, skills and employment opportunities for all Londoners.

The Airport aims to ensure that it has a high social and economic impact across East London by creating education and employment opportunities for local residents. LCY's aim is to hire as many local residents as possible and has therefore implemented a series of measures to increase the number of new recruits from East London. As per 2016 data, the Airport had 2,181 employees working on site of which 28% lives in Newham and 65% in the local area (Newham, Tower Hamlets, Greenwich, Barking and Dagenham, Waltham Forest, Redbridge, Havering, Hackney, Lewisham, Southwark, Bexley, Epping Forest District Council).

Additionally, London City Airport operates community programmes in 8 East London boroughs and in 2017 engaged 4500 school children in education initiatives, involved c2000 East Londoners in employment initiatives, and staff volunteered 500 hours to 11 different community programmes.

London City Airport also recognises the value STEM brings to its business, to the London economy and the future prospects of school children. Over the past 2 years the Airport, along with partners including Bechtel, Crowd Vision and NATS, has run STEM in aviation days that has set subject and Airport related challenges to over 300 east London pupils. With the Airport's new digital air traffic control tower coming on line in 2019, it remains fully committed to working in this area in the years to come.

The Airport requests however that the Mayor uses his strategic powers to adopt a consistent approach to the skills agenda, perhaps through the existing Skills Taskforce, analysing and setting the direction for the overall skills requirements to be applied consistently across the different London boroughs, where applicable. This would also be beneficial for cross-checking existing s106 employment targets.

User:	Andrea Carey Fuller

Such a policy should be the focus of this chapter. It should, however, be far more developed in terms of how the draft policies will support in addressing the specific key issues highlighted in paragraph 6.11.1 – alongside the setting targets around achieving positive change.

User: Cross River Partnership

This Policy is strongly supported. A cross-London approach to tackling the issue of skills is undoubtedly right. However, it is essential not to lose the degree of local discretion and flexibility, which enables an effective Policy to work well, with some influence being left with individual Boroughs, BIDs and skills trainers and providers.

For example, the London Borough of Tower Hamlets has already assessed the potential skills gaps that may emerge post-Brexit in the sectors that serve Canary Wharf and surrounding areas (such as retail, hospitality and construction) and is exploring how to remedy this, through education, training and apprenticeships.

This Policy could be amended to reflect the need to recognise and manage differences that may arise between a pan-London approach and a necessary level of local discretion.

It is essential that this Policy reflects the outcome of the recent consultations on the Skills for Londoners document published by the Mayor.

The reference in the Policy to use of Section 106 Agreements to advance the level of skills is welcome. However, it would be useful to amend the Policy on this point to acknowledge that sometimes this can best be done by developers employing apprentices training others, through Section 106 Agreements. This could be applied not just in the immediate vicinity of a particular project, but wider afield in the relevant part of London.

This policy also affords the opportunity to explore the benefits that flexible and affordable workspace can deliver. There are multiple benefits accruing from the ‘meanwhile use’ of space earmarked for future development or demolition, in terms of what they bring to startups and the creative economy. Specifically this is a collaborative environment that promotes innovation and entrepreneurialism.

User: UK Power Networks

UK Power Networks gained Employer Provider status through the Education and Skills Funding Agency (ESFA) in March 2017 and has a Platinum Provider Status by the Energy & Utility Independent Assessment Service for the delivery of the Trailblazer Apprenticeship Standards for Power. We are very proud that we were the first company to deliver Trailblazer qualified apprentices across all industries, which was recognised in the House of Lords by Lord Aberdare, Vice Chair of the All Party Parliamentary group for Apprenticeships.

Since 2014 we have taken on 110 apprentices in the London area with the purpose of the schemes delivering qualifications to new learners, ensuring they have the knowledge and skills to work safely whilst providing excellent opportunities for externally recognised qualifications to be achieved.

The duration of the programme varies to cater for different educational and experience starting points with individuals given the option of three distinct programmes:
? **Foundation Apprentices Programme (36 Months)** – aimed at school leavers and those with no previous work or engineering experience and are recruited ideally with A-C in English and Mathematics
? **Experienced Apprentices Programme (24 Months)** – aimed at apprentices who have previous work experience in subjects requiring practical skills i.e. Car Mechanics, Armed Forces, Window Fitters, and Electricians etc. they are also expected to have gained A-C GCSE or equivalent qualifications
? **Smart Metering Low Voltage (LV) Jointers Programme (18 Months)** – as above targeted at apprentices who have gained work experience in subjects requiring practical skills. The difference to the above is the apprentices are trained as Live LV Jointers and are not required to gain HV jointing competencies

Each bespoke programme is designed to enable apprentices to meet the skills required to become a qualified crafts person in either overhead lines, underground cables or as a substation fitter. Individuals are able to work towards the City & Guilds Electrical Power Engineering 2339 Technical Certificate with their programmes including maths and English skills and a personal development programme for outdoor environment work readiness.

To enhance the foundation apprentice’s interpersonal skills, they also have the opportunity to participate in a residential course with the Outward Bound Trust and complete a Duke of Edinburgh Award Scheme (DofE) at Gold level, which further challenges, engages and inspires the apprentices.

In addition to the above we also deliver an Engineer Development Programme (EDP) for 30 months, to provide learners with a Higher National Certificate (HNC) or higher. Participants follow a programme of operational training and rotation around business units to gain a broad engineering knowledge and understanding enabling them when qualified to manage teams, plan and deliver projects, and gain Senior Authorised Person status.

These programmes serve to illustrate how we provide opportunities to promote inclusive access to training, skills and employment opportunities for all Londoners.

User:	London Borough of Camden
The objectives of this policy are supported.	

User: Pat Turnbull

Policy E11 Skills and opportunities for all

What a pity this section is the last in the Economy chapter, almost tagged on as an afterthought. Is the approach of the draft London Plan likely to make this problem of unemployment, particularly youth unemployment, worse or better? 'Regeneration' of the type which means less productive work and more low paid service and shop work could make things worse.

I propose the plan looks at ways it can help re-establish the colleges which have disappeared – the Building Colleges, for example, at a time when people are bemoaning the shortage of building workers. While the spread of universities seems to be welcomed by this plan, the teaching of practical and productive skills seems to hardly get a mention.

User: Joint Industry Board for the Electrical Contracting Industry

The London Plan Response

The Joint Industry Board for the Electrical Contracting Industry ("JIB") sets standards for employment, welfare, grading and apprentice training in the electrical contracting industry. The JIB administers the collective bargaining agreement for the industry, negotiated by the parties to the JIB; the ECA and Unite the Union. Apprentices in the electrical industry are registered with the JIB under an approved Apprenticeship Training Scheme and in line with the applicable framework standard for the UK region. This includes industry agreed terms and conditions for those employed under the collective agreement.

The JIB and Scottish JIB jointly administer the Electrotechnical Certification Scheme ("ECS"). ECS is a partner scheme of Construction Skills Certification Scheme ("CSCS") and is recognised and endorsed by the electrical industry, allied trades and specialist industries. ECS is used for identification and competence assessment of workers in the electrotechnical industry, displaying appropriate grading (level of occupational competence aligned to qualification and experience requirements), health, safety and environmental awareness, qualifications and verified identity.

Jobs, Apprenticeships and Training

Off-site manufacturing may reduce requirements for construction labour on some projects, but this cannot be thought of as a miracle cure for the current poor state of skills development within the London construction sector.

In order to maximise skills-and-employment outcomes, contractors and developers should be required to emulate best-practice examples such as the Olympic Park, TfL, Crossrail and Tideway. This should include explicit contractually-binding numerical apprenticeship targets linked either to workforce ratios or contract value (for instance, the one apprentice per £3 million metric being applied by TfL, HS2 and Network Rail as part of the Transport Infrastructure Skills Strategy).

Qualitative measures of skills-and-employment outcomes should also be defined, made contractually binding, and enforced. Job starts should be of a minimum duration, and with an emphasis on opportunities for the genuinely long-term unemployed and other disadvantaged groups. Apprenticeships must provide the necessary value in terms of skills and development, including industry-recognised skills. Currently, there are too many fast track routes into construction that have little consideration for broad, transferable skills or competence. Individuals who follow these routes later find it difficult or impossible to find well-remunerated, safe and secure work. For example, the electrical contracting industry's minimum standard for skilled status is Vocational Qualification Level 3. This is achieved through completion of an apprenticeship or underpinning technical theory to a level 3, the completion of on-site work assessments to NVQ Level 3, and a practical performance assessment, the AM2. This process normally takes between 12 and 42 months, depending on prior experience and qualifications.

Monitoring the quality of apprenticeship delivery and completions is just as important. Developers and contractors should be discouraged from using college or training providers with low OFSTED ratings and/or a poor track record of delivering construction skills. Given the heavy reliance on subcontractors to carry out most of the construction work envisaged in the London Plan, subcontractor involvement in delivering jobs, apprenticeships and other outcomes like work placements should be maximised and supported. Given the high proportion of subcontractors that are SMEs this is likely to require external assistance. For example, in the electrical contracting sector the lead training provider, JTL, is able to secure high completion rates to industry-recognised standards at the same time as taking much of the administrative burden associated with apprenticeships away from SME employers. A cross-London brokerage arrangement should also help employers of all sizes and tiers meet, and ideally surpass, their minimum skills-and-employment obligations.

Finally, active engagement with industry-led organisations, such as the JIB, JTL, Unite the Union and the Electrical Contractors' Association, should assist the Construction Academy Scheme in achieving its objectives of maximising skills-and-employment opportunities, promoting equality and diversity, and encouraging under-represented groups to consider future careers in construction.

Pay Levels

The London Plan references the large construction projects which will be undertaken in the coming years, but there is little detail of fair payment structures. Living Wage Foundation membership among construction contractors is extremely low, in large part because client procurement policies often penalise contractors who price in the cost of paying the London Living Wage (LLW) in their tenders. The GLA itself and individual projects like the Olympic Park, Crossrail and Tideway have overcome this obstacle by mandating the LLW and pricing it into all their contracts. To protect the many thousands of Londoners employed in low-paying sectors, such as catering, cleaning, site logistics and security, this practice should be replicated on all London Plan projects.

For construction workers, the LLW is not an effective benchmark. Accordingly, following the examples of HS1, the Olympic Park, Crossrail, Tideway and HS2, a requirement to match applicable construction collective agreement terms and conditions (e.g., CIJC, BATJIC, JIB, HVAC and PMES) as a minimum should also be written into contracts, and compliance with this requirement passed down by developers and main contractors to subcontractors and labour suppliers of whatever tier.

The Welsh Assembly recognises the construction collective agreements within its Procurement Advice Note. Likewise, local councils around the UK are currently recognising and enacting this requirement through Construction Charters. As well as promoting direct employment under national collective agreements, these Charters adopt minimum standards for health and safety, equality and sustainability, and promote the benefits of trade union membership and organisation, recognising the role these can play in good employment relations. More than just a recommendation or guidance, advice from David Gollancz QC of Keating Chambers has confirmed that these Charters can be incorporated into public procurement policies and legally binding contractual provisions, and then flowed down into subcontracts. The JIB will be happy to work with the GLA and individual London councils to develop a similar London Construction Charter and/or Charters, with accompanying contract conditions.

Accreditation of Qualifications and Individual Competence

Non-competent, unqualified workers are a major threat to safety, environmental and quality standards on construction sites in London.

In the electrical contracting industry, the ECS is recognised by the wider Construction Skills Certification Scheme (CSCS) and the Construction Leadership Council as providing assurance that individuals have the appropriate experience, qualifications and safety awareness. Recent changes mean that clients, developers and main contractors can now verify the qualifications of electrotechnical personnel directly through an online software facility called ECS Check. This provides real-time information for auditing and reporting purposes, can be customised to match particular contractual compliance criteria, and is made available to clients, developers and main contractors free of charge. ECS Check should be mandated for use on all London Plan projects to ensure proper standards are in place for one of the most technically demanding and safety-critical construction occupations.

Direct Employment

The London construction industry has the highest levels of false self-employment and lowest levels of apprenticeship training in the UK. This combination of circumstances is not a coincidence. Professor Linda Clarke of Westminster Business School has demonstrated how excessive use of employment agencies and self-employment (most of it false) reduces training provision substantially. JTL has likewise confirmed that London is one of the worst performing areas of the UK when looking at the numbers of electrical apprentices starting and completing.

False self-employment also facilitates the exploitation of undocumented migrant workers, who appear on sites in London with little, if any, construction training or experience. Construction has been noted by the Gangmasters and Labour Abuse Authority (GLAA) as one of the sectors with the highest risk of exploitation by gangmasters due to the high profits available and vulnerability of a transient site-based workforce. These workers are typically paid well below industry norms, so that the terms and conditions of local qualified tradespeople are undercut. On 21st February 2018, for example, it was reported that the GLAA had launched raids across East London into the exploitation of vulnerable non-UK workers. Operation Magnify has so far investigated 153 construction sites, with more than 250 illegal workers discovered and fines levied passing £1.5 million. The Home Office has reported that 40 of the sites visited were large multi-million pound projects overseen by substantial main-contractor organisations.

In response, we recommend that all projects covered by the London Plan must observe a complete ban on all forms of false self-employment, and adopt all necessary measures to maximise PAYE direct employment, along similar lines to the direct employment policies previously adopted on the Olympic Park and Crossrail. Direct employment gives mutual assurance to allow both employers and individual employees to commit the necessary time, effort and finance to achieve proper training standards in the form of an apprenticeship. Direct employment also facilitates the adoption of fair, industry-recognised terms and conditions and proper verification of qualifications and right to work, whilst reducing risks from labour exploitation and avoidance of tax, national insurance and employment law obligations, which are currently endemic within the London construction market.

Further Discussion

Further to the above concerns and points for discussion, the signatory parties to the JIB Agreement, the ECA and Unite the Union, seek a joint meeting with the Mayor.

Policy G1 Green infrastructure

User:	David Callow
Policy G1. Green infrastructure. I support this policy, and subsequent narrative that mentions the important role of trees.	

User:	David Tannahill
Policy G1. Green infrastructure. I support this policy, and subsequent narrative that mentions the important role of trees.	

User:	Elisabeth Rolls
Policy G1. Green infrastructure. I support this policy, and subsequent narrative that mentions the important role of trees.	

User:	Adrian Malcolm Darley
Policy G1. Green infrastructure. I support this policy, and subsequent narrative that mentions the important role of trees.	

User:	Agnes Byrne
Policy G1. Green infrastructure. I support this policy, and subsequent narrative that mentions the important role of trees.	

User:	Alan Jacobs

Policy G1. Green infrastructure. I support this policy, and subsequent narrative that mentions the important role of trees.

User:	Alan James North
Policy G1. Green infrastructure. I support this policy, and subsequent narrative that mentions the important role of trees.	

User:	Mrs R Jennings

We understand that your proposals are to remove the protection of back gardens and we cannot understand why. Maintaining the character of the area matters to people. It is not an urban area with concreted gardens and houses built in high density. It offers a transition from metropolitan to Green Belt and we are very much about maintaining that aspect.

User: Matthew Robinson

In G1 I support the additional policy:
D Local Authorities and the GLA to support education programmes for a new generation of skilled Green Infrastructure workers to develop a globally innovative urban ecology by funding and enabling:
- Schools programmes in gardening and outdoor play
- Accredited training e.g. agroecological food production, food forestry, biodiversity management, renewable energy
- Paid work placements: apprenticeships and shorter-term placements that support people to further develop skills in the work environment and provide sustainable employment opportunities.
- Associated “next steps” training — e.g. enterprise training, community development training.

To develop the biodiversity, green space, urban greening, and woodland programmes outlined in the London Plan draft this necessitates a new generation of skilled workers to implement Green Infrastructure strategies.

Inequality is widening in London (TrustforLondon 2017) and the creation of green infrastructure training and job opportunities will be part of a multifunctional strategy of:
- responding to unequal economic opportunities in the capital
- making London a global leader in resilience planning for climate change
- enabling Londoners to be directly involved in the shaping of their lived environment

The RSPB report (2010) highlights how children’s contact with nature contributes to pupil’s development and future economic well being (Ofsted 2008), increases health and well-being (Bird 2007) and aids the development of personal and social skills (Ward Thompson et al. 2007). I believe that this is essential to the London Plan's over-arching good growth principles as amended by CFGN and Just Space: GG1 (Building strong and inclusive communities), GG2 (Making the best use of land), GG3 (Creating a healthy city), GG5 (Growing a good economy), GG6 (Increasing efficiency and resilience).

User:	Fenella Barton
Green infrastructure. I support this policy, and subsequent narrative that mentions the important role of trees.	

User:	Fenella Barton
Green infrastructure. I support this policy.	

User:	Joan Anne Hepworth
Policy G1 should be supported since it emphasises the importance of trees.	

User:	William Lucy

Policy G1 Green infrastructure **Support** this policy, and subsequent narrative that mentions the important role of trees.

Support the inclusion of the role and weighting for woodland and trees in Table 8.2 – Urban Greening Factors.

Recommend including a reference to *Residential Development and Trees* (Woodland Trust, 2015, woodlandtrust.org.uk/residentialdevelopments).

User: London national Park City Foundation

Green infrastructure - Policy G1, Pages 302

LNPCF supports Policy G1:

A. London's network of green and open spaces, and green features in the built environment such as green roofs and street trees, should be protected, planned, designed and managed as integrated features of green infrastructure.

B. Boroughs should prepare green infrastructure strategies that integrate objectives relating to open space provision, biodiversity conservation, flood management, health and wellbeing, sport and recreation.

C. Development Plans and Opportunity Area Planning Frameworks should: 1) identify key green infrastructure assets, their function and their potential function 2) identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.

Supporting text:

8.1.1 A green infrastructure approach recognises that the network of green spaces, street trees, green roofs and other major assets such as natural or semi-natural drainage features must be planned, designed and managed in a more integrated way to meet multiple objectives including: promoting mental and physical health and wellbeing; adapting to the impacts of climate change; improving air and water quality; encouraging walking and cycling; and conserving and enhancing biodiversity and ecological resilience alongside more traditional functions of green space such as play, sport and recreation.

8.1.2 All development takes place within a wider environment and green infrastructure should be seen as an integral element and not as an 'add on'. It's economic and social value has become increasingly evident across all of London at all scales and has been highlighted in the London i-Tree Assessment and the Natural Capital Account for London's Public Parks.

8.1.3 To help deliver on his manifesto commitment to make London at least 50 per cent green by 2050, the Mayor will review and update existing Supplementary Planning Guidance on the All London Green Grid – London's strategic green infrastructure framework - to provide guidance on the strategic green infrastructure network and the preparation of green infrastructure strategies.

User:	London Beekeepers' Association

Finally, we note that green infrastructure contributes benefits to air quality (Policy SI1), to sustainable drainage and flood mitigation (Policies SI12, SI13), and makes an important contribution to well being and mental health of all Londoners.

User: Keith Saunders

The importànce of trees and woodlands cannot be emphasised enough. They improve air quality, provide vital habitat for wildlife, much of which is disappearing from urban areas and aesthetically they help to brea? up views of endless buildings. Also, people feel better and more relaxed in wooded areas. I work as a conservation volunteer and any time spent in woodland makes me feel better in myself.

In the sections listed below (in the same order as they appear in the draft London Plan).

- Paragraph 1.3.3. Recommend an addition (in CAPS) to the following sentence: “Access to green and open spaces, including waterways AND TREES, can improve health, but access varies widely across the city.”
- Paragraph 3.9.5. I support the inclusion of “Protection for trees” as an issue in the amplification of potential negative impacts of large-scale basement development beneath existing buildings.
- Policy H1. Increasing housing supply. I recommend that Sentence B2)d is clarified so that “public sector owned sites” will not include woodland, parks and open spaces.
- Paragraph 4.2.9. I support the principle of “no net loss of overall green cover” as a result of small housing developments, and support “off-site provision such as new street trees” in order to achieve this principle. I recommend an addition (in CAPS) to the following sentence: "Loss of existing biodiversity OR GREEN SPACE, as a result of small housing developments, should be mitigated through measures such as the installation of green roofs, the provision of landscaping that facilitates sustainable urban drainage, or off-site provision such as new street trees in order to achieve the principle of no net loss of overall green cover. Rainwater attenuation features should be incorporated to achieve greenfield run off rates. LOSS OF ANY PUBLIC GREEN SPACE WILL BE COMPENSATED FOR WITH ALTERNATIVE ACCESSIBLE SITES.”
- Policy S4. Play and informal recreation. I support section B2)d, that residential development proposals for schemes that are likely to be used by children and young people should incorporate good-quality, accessible play provision for all ages, of at least 10 square metres per child that: “incorporates trees and/or other forms of greenery”.
- Policy G1. Green infrastructure. I support this policy, and subsequent narrative that mentions the important role of trees.
- Policy G5. Urban greening. I support this policy, including the recommended Urban Green Space Factor, and subsequent narrative that mentions the important role of trees. I support the inclusion of the role and weighting for woodland and trees in Table 8.2 - Urban Greening Factors. I recommend including a reference to Residential Development and Trees (Woodland Trust, 2015, woodlandtrust.org.uk/residentialdevelopments).
- Policy G6. Biodiversity and access to nature. I support this policy. I recommend that Sites of Metropolitan Importance and all ancient woodlands are added to the categories of planning applications that must be referred to the Mayor.
- Policy G7. Trees and woodlands. I support this policy. I recommend that Section B)1 is strengthened as follows (amendments in CAPS): “GIVE THE STRONGEST POSSIBLE protectION TO ‘veteran’ trees and ancient woodland, ESPECIALLY where these are not already part of a protected site”. I support the subsequent narrative on the role of trees, particularly paragraphs 8.71 – 8.73. I recommend referring London boroughs to guidance on ancient woodland and veteran trees: Planners’ manual for ancient woodland and veteran trees(Woodland Trust, 2017, woodlandtrust.org.uk/plannersmanual).

Please accept this my formal response to the consultation. I will look forward to hearing from you as the Plan progresss.

Policy G2 London's Green Belt

User:	Mrs Lesley Mitchelmore

I support the policy to protect London's greenbelt land but NOT at the expense of greenbelt land in neighbouring authorities such as Brentwood, Basildon, Thurrock and Chelmsford, though the mechanism of duty to cooperate.

User:	Mrs Lesley Mitchelmore

I support this but it is important that regenerated areas provide housing that is affordable to people who do not qualify for social housing and help to buy schemes - hard working people who do not benefit from large salaries.

User:	Mrs Lesley Mitchelmore

It is important the landowners aren't allowed to allow green belt land to become derelict so that they can argue its case to become development land.

User: Mrs Sarah Perry

Excellent policy, this should remain a focus. However, strength needs to be given to Local Authorities through the Nartional Planning Framework/Central Government/London Plan to be able to turn down planning applications that would undermine this policy.

The discrepancy between the need for additional housing, economic development and protection of green spaces is addressed strongly within this new Plan and is done so in a holistic way, especially in relation to the Spatial Planning, Good Growth and Green Infrastructure sections. However could the Plan go further to suppport implementation by Authorities of this integrated approach on the ground?

User: Mrs Sarah Perry

Excellent point, clear strategy/policy.

When working with the Borough's to assess the extent to which derelict parts of the green belt could be enhanced for access/Londoners the importance of the other points mentioned in this policy (biodiveristy, ecological resilience, plus habitat connectivity and diversity) need to be strongly accounted for as increased access may lead to less diverse/rich pockets of green belt.

User:	Mr Christopher Waller

The urban heat island effect is generally localised and concentrated in central and inner London - protecting green space in Inner London will do more good in that regard than tracts of Green Belt near Romford or Bexleyheath. Green Belt land can have environmental benefits where of good quality, but the urban heat island effect is not one of them given its location.

User: Mr Christopher Waller

There is no need for the London Plan to be more prescriptive regarding Green Belt than the NPPF. An inflexible attitude to Green Belt release merely forces commuters outwards and results in longer commutes and higher carbon emissions.

In the long term, the Mayor should seek to establish a Royal Commission into the Green Belt in light of its significant departure from the concept of a narrow "Green Girdle" into a thick band which people still "leap-frog" at significant environmental disbenefit when commuting into London. A Copenhagen style "finger plan" should be seriously considered.

A short term measure within the remit of the London Plan would be to rename the Green Belt something less emotive, such as an "Urban Containment Zone". This would help neutralise the more emotive and less rational arguments in favour of its retention.

There should be a presumption in favour of Green Belt release where such land is within PTAL 3-6, or 800 metres of a town centre, or a tube or rail station; unless other environmental designations such as flood risk, SINCs, or SACs apply, similar to policy H2.

User: Mrs Mary Page

The Green Belt MUST be maintained for future generations. For those who say it is "outdated" and the land is needed for development I say NO! The Green Belt was set up with foresight exactly BECAUSE it was envisaged that the day would come when population growth would put pressure on the land. Green and open spaces are necessary for a balance in nature and the quality of the air we breathe. We do not want London to spread ever outwards in one huge concrete urban sprawl swallowing up more and more countryside and leading to more flooding, etc. Even little pockets of green within current boundaries are valuable to enhance the quality of life and biodiversity. Perhaps more attention should be given to reducing population growth. Current levels are unsustainable, and more cheap high-rise housing to make a few developers rich is NOT the answer!!

User:	Dr E Coakes

It is essential to protect the Green Belt as it currently is. No housing shold be permitted on green belt land. It is essential to redevelop brownfield land appropriately and the housing density can be increased by using designs such as those suggested Richard Rogers with green space but a higher density than single family dwelling in their own gardens.

User: Ms Ozden Keskinel

Enfield Rd green belt serves as a buffer between towns, and between town and countryside. This gives the incentive to separate the countryside within the urban

Enfield Road- Green Belts bring social, environmental and economic benefits, while giving people a chance to tap into nature's beauty on their doorstep. The land is extremely valuable for food production, flood prevention, climate change. Animals such as horses, squirrels need their habitat.

The idea that house-building provides the answer to housing problems simply does not bear scrutiny.

The roads by Winchmore Hill have been ruined and have caused such upset and uproar (nothing to do with green belt I know) but to think Enfield is to be interrupted once again with 'change for the better' makes my blood boil. Please, please keep the beauty of the green fields within Enfield Rd. It's part of its character and needs to remain untouched.

User:	Mr Quentin Given

Stronmgly support protection of Green Belt and improvement of its habitat value.

User:	Mr Ishwar Chauhan

I support the policy of maintaing and if possible increasing the availability of green belt land.

As we build more and more houses andour communities expand we should ensure we maintain our green belt land to support these additional homes.

User:	Mrs Sarah Witney

I support the approach to Green belt. It does however offer nothing to stop Council's agreeing any planning applications to build on it as they see fit.

User:	Mrs Marilyn Mason

We support protection of and enhanced access to the Green Belt and other green spaces, and appropriate improvements that would protect biodiversity in these spaces.

User: Elmbridge Borough Council

To whom it may concern

Following the publication of the draft London Plan yesterday, and a quick review of certain chapters https://www.london.gov.uk/sites/default/files/draft_london_plan_chapter_8.pdf) , please could you correct the error with the use of ‘it’s’ in Policy G2 below. The correct version should be ‘its’, i.e. the possessive form of ‘it’, not the contracted form of ‘it has’ or ‘it is’. Thank you.

Policy G2 London's Green Belt

A The Green Belt should be protected from innapropriate development:

1) devolpment proposals that would harm the Green Belt should be refused

2 the enhancement of the Green Belt to provide appropiate multi-functional uses for Londoners should be supported.

B The extension of the Green Belt will be supported, where appropiate. **It's** de-designation will not.

Kind Regards

Edward Chetwynd-Stapylton

BSc Hons, Dip TP, DipSurv, MRTPI, FRGS

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Planning Services

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User: Levitt Bernstein

There is a need to allow for targeted development within the metropolitan green belt where it reinforces growth strategies of regional and national significance such as the London to Cambridge growth corridor. Where appropriate, targeted and compatible, mixed use development within the metropolitan green belt should be seen as part of a suite of measures, that includes development of brownfield land, to address the chronic undersupply of housing in London and the wider south east of England.

Within the Greater London boundary 22% of all land is designated as Green Belt. Some parts of the Green Belt are more accessible than others, but it includes many areas close to existing stations. Realising the potential of other areas may require investment in substantial new infrastructure. Some of the Green Belt is of great value and must remain fully protected. Green Belt designation does not imply beauty, public access or biodiversity. Only a fifth of London's Green Belt has an environmental status or is accessible to the public as green space.

A full land quality assessment register should be compiled for the Green Belt. Controlled release of appropriate bits of Green Belt could be an effective way to deliver substantial numbers of new homes. Super compensatory environmental mitigation measures as well as exemplar Design standards should be required for any development within the Green Belt.

User:	Shared Assets

We support London Food Link's response:

Add *"Support will be given for schemes that utilise and protect the Greenbelt for food production, where this enhances the environment and amenity of the land."*

Justification

We welcome the protection of the Greenbelt and feel this should be reflected in the policy. This should reference climate friendly food, increase food security and create green business opportunities.

User: Mrs Christine Walker

I am very much in favor of supporting the " Keep Havering Special " campaign and am strongly against the ridiculous target set by Sadiq Khan to build 1,875 homes annually in Havering.

We need to keep the countryside and open spaces in Havering. We need to keep the air quality from being as toxic as it is in inner London. As you enter the Borough of Havering it is like a breath of fresh air and you are aware of the green areas and trees as opposed to concrete upon concrete. I find it a relief to come in to Havering from London . It is essential that we protect our borough and keep it green.

User: Goldcrest Land

Amend Section B of the policy so as to read:

B The extension of the Green Belt will be supported, where appropraite. In appropriate locations the de-designations of the Green Belt or redevelopment or under utilised brownfield sites will be supported where there is a need to release land to meet objectively assessed housing need

There are locations where the Green Belt boundary fails to meet the purposes of Green Belt as set out in the NPPF, is in sustainable locations and can make a contribution to housing supply and delivery. There are a number of examples just outside London and elsewhere in England where this has shown to be the case. To ignore this and say 'no change' is short-sighted and not in accordance with best practice towards Green Belt boundaries.

User:	Sport England

One of the key roles of Green Belt land is to provide opportunities and facilities for outdoor sport. It is therefore recommended that the supporting text is amended as follows:

‘London’s Green Belt makes up 22 per cent of London’s land area and performs multiple beneficial functions for London, such as combating the urban heat island effect, growing food, and providing space for ***outdoor sport and*** *recreation.’*

User: MR Ian Pirie

I strongly support 8.2.2 - in our borough (Havering), open spaces that have been left to go 'wild' are often seen as opportunities for gravel/mineral extraction, and their environmental/biodiversity importance is ignored.

Qutoas for mineral extraction are in conflict with preserving green belt in our experience.

User: Lee Valley Regional Park Authority

Please see attachment for full document:

"Whilst over 90% of the Regional Park is designated as green belt or MOL, there should be recognition within the draft plan that an exception to this standard policy is required or a reference included in supporting text to the Authority in pursuit of its statutory purpose to allow for the redevelopment and or expansion of its venues. Without this change the Authority's ability to deliver will be frustrated. For the Authority, this is particularly important as we are reducing dependency on the levy paid by the London taxpayers, by ensuring that venues operate at nil cost and are sustainable and viable community assets in the long term."

User: Mr Nish Patel

Hi

I own land in London which has I believe been incorrectly designated as Green Belt under the criteria in the NPPF. Further, the council missed their review of my land as part of a total review of Green Belt they carried out in 2016. This is currently with the LGO (who accepts there is a prima facie case for the council to answer) and is likely to end in judicial review.

I note the London Plan as a section for Green Belt and note the Mayor's unwillingness to de-designate but think this should only apply to land where the designation is correct in the first place. I am due to hear back from the LGO in the next 4 weeks but he has suggested I contact you to ensure my issue is known and addressed within the consultation period.

I have all the details of this but please let me know the best way to forward this issue. I registered on the MOL website to create an account but have not received a confirmation email hence sending this be email.

User: QPR Football Club

Policy G2 London's Green Belt

Draft Policy G2 reiterates the importance of the Green Belt and states that it should be protected from inappropriate development. However, it fails to acknowledge that in 'very special circumstances' inappropriate development may be allowed. This is important in the context of the comments above in connection with professional sport. The current London Plan includes such reference in Policy 7.16 B and the New Draft Policy G2 should also be amended to reflect this.

User:	Southern Housing Group

The Group supports policy G2A, with regards to the improvement of existing green belt, however we do not support G2B. We do not agree that de-designation of the greenbelt should be avoided in all cases, and we strongly believe that this policy is in conflict with the Mayor's intention to maximise housing supply and intensify land use. There is a considerable amount of 'grey belt' in the outer London boroughs, much of which is providing no real amenity, and is well served for transport and local infrastructure. We are not suggesting that this land should be used for high density developments, however we believe that much of this land could be brought into use by a combination of new housing and new amenity provision. If such sites were to be de-designated in a sensitive manner, developers could provide some new housing on a percentage of the site, whilst also implementing policy G2A and improving the remainder of the site, to be retained as green belt.

User:	Ms Karen Theodorou

It is very important to protect the Greenbelt as it has many environmental benefits and once its gone it has gone forever.

User: The Enfield Society

The plan states that "*the Green Belt should be protected from inappropriate development, that development proposals that would harm the Green Belt should be refused, that extension of the Green Belt will be supported, where appropriate and that de-designation will not be supported.*

The Enfield Society strongly supports these statements and welcomes the commitment to protect the Green Belt. In many outer London Boroughs the green belt is under pressure from development proposals and we believe that these statements will strength the power of local planning authorities to refuse development applications within the green belt.

The Plan also states that *"the enhancement of the Green Belt to provide appropriate multi-functional uses for Londoners should be supported"* . While the Society supports recreational use of the Green Belt as this was one its original aims, any recreational development needs to be carefully planned so that it does not lead to creeping urbanisation of the Green Belt.

We note that the Plan refers to the protection of Metropolitan Open Land and that as at present, desirable land swops of MOL can be agreed subject to the Mayor's approval. We support the protection of MOL.

User:	Brentwood Borough Council

The Draft London Plan confirms the Mayor of London's commitment to protecting the Green Belt where it states that the London Plan "*aims to accommodate all of London's growth within its boundaries without intruding on its Green Belt or other protected open spaces*" (2.3.1). The Council acknowledges the importance of protecting the Green Belt. However, the Mayor's Green Belt policy is likely to have a negative impact on the London Plan's ability to achieve its housing targets. Local planning authorities restricted by Green Belt, such as Brentwood Borough (with 89% of the total borough area being within London's Metropolitan Green Belt), are expected to conduct a reviews and assessments of the ongoing purpose of the Green Belt in their area and to determine whether the release of land would be appropriate to achieve local housing needs. Therefore, a review of the wider London Metropolitan Green Belt in its entirety should be considered in order to identify if there are other growth areas which have yet to be identified.

User:	London Food LInk /Sustain

Add: ‘Support will be given for schemes that utilise and protect the Greenbelt for food production, where this enhances the environment and amenity of the land. ‘

We welcome the protection of the Greenbelt and feel this should be reflected in the policy. This should reference climate friendly food, increase food security and green business opportunities. Currently this policy falls short of addressing the demand that will be placed on the Greenbelt, along with challenges faced in terms of diet and food production. The policy should give planning authorities the power to protect productive green use on finite peri-urban lands and actively support land uses that deliver public and environmental value.

User:	Crispin Truman
"Protecting the Green Belt requires stronger enforcement."	

User: Mr Peter Martin

It should be recognised that an excessively high and unrealistic housing target for Outer London will put the Green Belt at risk

Experience has shown that where there is a shortfall in the housing target Boroughs are vulnerable at appeal to the argument put forward by developers that their Green Belt sites have to be released. The unrealsitic tragets in Table 4.1mean that there will be a shortfall occurring in many parts of London at an early stage in the Plan period.

User: MSP Strategies Ltd

There are some areas of the Green Belt, which are of very poor quality. They can be fly tipping hot-spots, covered in pylons and generally unattractive. There are also areas, which are not formally Green Belt or MOL but are attractive spaces for biodiversity or leisure, which should be protected.

The absolutist approach to defend the Green Belt as enacted in planning documents decades old is one of the reasons for the difficulty in accommodating London's growth.

The London Plan should promise that there be no NET loss in Green Belt. Effectively if a portion is developed then another area of the same size should be designated Green Belt to make up for it. Essentially a land-swap: ugly, developable land out of the Green Belt; attractive land to be designated Green Belt.

User:	Mr Chris Gannaway

Strongly agree with this policy but would note that boroughs have been taking advantage to deregulate Green belt to meet the housing conditions of the current London plan many Biodiverse sites may be lost to housing due to this.

User: mr martin watts

I am writing to respond to the draft London Plan consultation. I am pleased that the draft recognises the importance of green spaces but policies need to be stronger to give them adequate protection, in particular:

Protecting the Green Belt requires stronger enforcement.

your comments would be apprciated

User:	London Forum of Amenity and Civic Societies
London supports Policy G2.	

User: London Assembly Green Party Group

This policy follows what I proposed in Towards a new London Plan. The need to develop first inside London's boundaries underpins the rest of the spatial development strategy and is the right choice.

"We have sufficient land supply to resist any premature changes to current Green Belt designations. With an uncertain future in terms of economics and immigration (the major driver of population change in London) the wisest policy is to strengthen these protections to ensure that the best possible use is made of brownfield land, infill and densification over the period of this plan."

Towards a new London Plan

The wording of policy G2 B should be reinforced to include a strong presumption against the alteration of Green Belt boundaries which reduces its extent. I support CPRE London's proposed new wording with our proposed amendment below.

Proposed amendment to policy G2 (change highlighted in bold):

B The extension of the Green Belt will be supported and its de-designation will not. **We will enforce a presumption against the loss of Green Belt.**

User: Alan Simpson

I welcome Policy G2 and particularly the proposal in Policy G2B that ‘de-designation’ of Green Belt will not be supported. This policy needs to be reinforced for it to be effective. **Proposed change:** A presumption against the alteration of Green Belt boundaries which reduce its extent should be included in policy G2B so that it reads: **‘The extension of the Green Belt will be supported and its de-designation will not. We will enforce a presumption against the loss of Green Belt’.**

User: Aviva Investors

Aviva Investors own land (Mellow Stocks) to the south of the Barwell Industrial Estate in Chessington (Royal Borough of Kingston upon Thames), which is currently in the Green Belt.

Planning policy is very important to Aviva Investors as it can provide greater certainty in the planning and implementation of future investment.

Policy G2 and supporting text (paras. 8.2.1–8.2.2) confirm the Mayor's support for the continued protection of London's Green Belt. Part (B) of Policy G2 states that *"It's [sic]* [the Green Belt] *de-designation will not".* Paragraph 8.2.1 states that *"The Mayor strongly supports the* ***continued protection of London's Green Belt".***

Paragraph 83 of the National Planning Policy Framework (NPPF) states that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.

Paragraph 87 of the NPPF states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

The Mayor has chosen not to replicate, reflect or refer to NPPF policy regarding altering Green Belt boundaries, or development in the Green Belt, in his draft policy, opting instead for simplified wording that is not consistent with national policy. However, the supporting text to this draft policy does refer to the NPPF in the context of defining Green Belt boundaries and development management. The Mayor is, in effect, selectively referring to NPPF policy, while also stating that de-designation of the Green Belt will not be supported in any circumstances.

The Mellow Stocks site owned by Aviva Investors comprises scrub land and is not considered to contribute positively to the openness of the Green Belt (bordered by the A243, Chessington World of Adventures and the Barwell Industrial Estate SIL), nor other Green Belt purposes set out at paragraph 80 of the NPPF. Its future development could provide a natural extension to the existing industrial area to the north, or for other uses, to provide opportunities for sustainable growth and deliver the associated economic benefits. It is accepted that exceptional circumstances would need to be demonstrated for its release, or very special circumstances for inappropriate development, in line with the NPPF, but national policy does not preclude this potential outcome. Draft Policy G2 (B) as currently drafted seems to deliberately fail to acknowledge this fact.

The wording of Policy G2 should therefore be amended as follows:

(A) The Green Belt should be protected from inappropriate development:

1) development proposals that would harm the Green Belt should be refused ***except in very special circumstances***

2) the enhancement of the Green Belt to provide appropriate multi-functional uses for Londoners should be supported.

(B) The extension of the Green Belt will be supported, where appropriate. Its de-designation will not, **except in areas released through the preparation and review of a Borough's Local Plan, for which exceptional circumstances must be demonstrated.**

User:	Adrian Cowie

I welcome Policy G2 and particularly the proposal in Policy G2B that ‘de-designation’ of Green Belt will not be supported. This policy needs to be reinforced for it to be effective. **Proposed change:** A presumption against the alteration of Green Belt boundaries which reduce its extent should be included in policy G2B so that it reads: **‘The extension of the Green Belt will be supported and its de-designation will not. We will enforce a presumption against the loss of Green Belt’.**

User: Watford Borough Council

The green belt is essentially defined by what it is preventing, urban sprawl. Therefore, this should be mentioned as the key reason for it. "Growing food" and “Space for Recreation" is purely an added bonus/ beneficial repercussion of having green belt. This paragraph should be reworded to emphasis this point, as the purpose of the green belt's importance is somewhat diminished if it is considered mostly in terms for 'softer' benefits such as food production and leisure, although important, the strength of the greenbelt is, as mentioned, preventing extensions and encouraging the intensification of brownfield sites.

Suggested change: Change wording to identify preventing sprawl as the key function of the greenbelt of designation.

User:	MSP Strategies Ltd

The maintaining of the Green Belt as designated decades ago is one of the reasons leading to London, and the wider UK's, housing crisis.

Much of the Green Belt is of poor quality. Equally other land is high quality and yet is not designated Green Belt.

There should be consideration to de-designate some areas of Green Belt around high PTAL areas if another, equally sized, area can be designated Green Belt: essentially a land swap.

User:	Paul Stansfield

I welcome Policy G2 and particularly the proposal in Policy G2B that ‘de-designation’ of Green Belt will not be supported. This policy needs to be reinforced for it to be effective. **Proposed change:** A presumption against the alteration of Green Belt boundaries which reduce its extent should be included in policy G2B so that it reads: **‘The extension of the Green Belt will be supported and its de-designation will not. We will enforce a presumption against the loss of Green Belt’.**

User:	Dr Leslie Clark

I strongly support Policy G2 and particularly the proposal in Policy G2B that ‘de-designation’ of Green Belt will not be supported, but it needs to be reinforced for it to be effective. Proposed change: A presumption against the alteration of Green Belt boundaries which reduce its extent should be included in policy G2B so that it reads: ‘The extension of the Green Belt will be supported and its de-designation will not. We will enforce a presumption against the loss of Green Belt’.

User: Ms Meenakshi Sharma

A

1. The Green Belt should be protected from inappropriate development:
    1. development proposals that would harm the Green Belt should be refused
    2. the enhancement of the Green Belt to provide appropriate multi-functional uses for Londoners should be supported.

B

1. The extension of the Green Belt will be supported, where appropriate. Its de-designation will not.

This is an extremely short-sighted approach which panders to the affluent who live near the Green Belt and have no empathy for those who are living in the highly dense, congested, under-resourced and unhealthy environments that this spatial strategy is creating. There has been no proper debate on this issue with the ordinary Londoner. It has been hijacked by the elite to protect their interests. This is totally ideologically driven.

It the Green Belt is not to be used, then the richer wards need to take their fair share of the housing and not just put it all in the poorer areas. This is creating an unsustainable environment, where people cannot afford the huge uplift in prices in the poorer areas, leading to overcrowding, poor standards, debt and homelessness.

User: Ms Meenakshi Sharma

8.2.2

Openness and permanence are essential characteristics of the Green Belt, but despite being open in character, some parts of the Green Belt do not provide significant benefits to Londoners as they have become derelict and unsightly. This is not, however, an acceptable reason to allow development to take place. These derelict sites may be making positive contributions to biodiversity, flood prevention, and reducing the urban heat island effect. The Mayor will work with boroughs and other strategic partners to **enhance access** to the Green Belt and to **improve the quality** of these areas in ways that are appropriate within the Green Belt.

These are ridiculous statements and are made as if there is no housing crisis in London. We do not have the luxury of these statements, which are made by people who are not having to face the crisis on a daily basis.

User: Royal Botanic Gardens, Kew

G2A

We strongly support protecting the Green Belt from inappropriate development. We recommend that when considering development proposals in the Green Belt, that the biodiversity net gain principle should be applied. We note that the net gain principle was included in the London Environment Strategy, in Policy 5.2.1, but does not appear in the consultation document for the London Plan, and therefore ask that it be explicitly included.

User: London Borough of Hammersmith and Fulham

Policy G2 London’s Green Belt

We object to the Mayor’s approach to Green Belt is not in conformity with national planning policy. National planning policy allows authorities to review and amend Green Belt boundaries, including removing sites from Green Belt designation. The Mayor’s approach does not allow any de-designation, going further than the NPPF. The continued restriction upon London Green Belt places additional pressure for inner London boroughs to deliver high density housing where open space, employment facilities, community facilities are already under pressure. This inevitably further perpetuates high land values across London.

User:	Ms Elizabeth Nuckowska

Green Belt is even more critical as the population grows and people need the escape from hectic lives. Many wildlife habitats and species have already disappeared amd we need to halt this trend. Green Belt is the lungs of the City and will be even more needed in the future.

User:	Twinn Sustainability Innovation
Note: The continued protection of London's Green Belt is strongly supported	

User: Wealden Land Ltd

The London Plan Draft for Public Consultation December 2017

Wealden Land Ltd

February 2018

Introduction

These representations are submitted on behalf of Wealden Land Ltd, in response to The London Plan The Spatial Development Strategy for Greater London, Draft for Public Consultation, December 2017.

Our client has a substantial brownfield site at Sidcup in the Borough of Bexley, which is environmentally harmful to local residents and its Green Belt environment. There is an opportunity to remove this non-conforming use and to enhance the site through residential redevelopment, with potential for a small element of B1 offices.

Our client is a Member of the Home Builders Federation and supports the representations made by HBF in relation to the Draft Housing Policies in the Draft London Plan. These representations therefore focus on the Draft Green Belt policy.

Planning Policy Context

National Planning Policy Framework (NPPF)

These Representations have regard to the relevant paragraphs within the NPPF and their consistency with the principles and policies set out in the Draft London Plan, in particular, section 9 “Protecting Green Belt land”:

Paragraph 83 of the NPPF impresses that Local Planning Authorities should only alter Green Belt boundaries, in exceptional circumstances, through the preparation or review of the Local Plan. At which time, authorities should consider the Green Belt boundaries having regard to

their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

Paragraph 84 continues: “When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development.”

Paragraph 85, provides further guidance to local planning authorities for defining Green Belt boundaries, including:

- ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- not include land which it is unnecessary to keep permanently open;
- where necessary, identify in their plans areas of ‘safeguarded land’between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period;

When considering a planning application, paragraph 89 lists a number of scenarios where the construction of new buildings is an exception to inappropriate development, including:

limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.

In summary, the NPPF places great importance on the protection of the Green Belt, whilst providing flexibility especially on brownfield land to allow local planning authorities to review Green Belt boundaries, where appropriate, to establish whether the land continues to meet the purposes of the Green Belt, and to grant planning permission for new redevelopment so long as the openness of the Green Belt is respected.

In relation to previously developed land, paragraph 111 directs:

Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value. Local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land.

It should be noted that our client’s land meets the environmental test above.

Paragraph 182 sets out the Tests of Soundness for a Local Plan to be assessed against to be considered sound. These representations

consider the Draft London Plan as published against these tests of soundness, namely whether it will be:

(i) ***Positively prepared*** *– the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it reasonable to do so and consistent with achieving sustainable development;*

(ii) ***Justified*** *- the plan should be the most appropriate strategy, when considered against reasonable alternative, based on proportionate evidence;*

(iii) ***Effective*** *–the plan should be deliverable over its period and based on effective joint working on cross boundary strategic priorities; and*

(iv) ***Consistent with national policy*** *– the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.*

Representations

Policy G2 London's Green Belt

In accordance with the NPPF, Policy G2 seeks to protect the Green Belt from inappropriate development. However, part B of the Draft policy states:

"The extension of the Green Belt will be supported, where appropriate. It's [sic] de-designation will not."

This policy evidently goes beyond the directions of the NPPF and removes any flexibility for reviewing the Green Belt boundary, in relation to de-designation. This overly strict approach does therefore not meet the tests for soundness set out in Paragraph 182 of the NPPF, as it fails to be "consistent with national policy."

The NPPF is clear in its direction that the review of Green Belt boundaries should be at the discretion of the local planning authority, yet the wording of this policy would remove the opportunity for local authorities to assess and determine the appropriateness of land remaining in the Green Belt, which in some cases may no longer meet the criteria and objectives of Green Belt land.

This complete removal of flexibility toward “de-designation” poses a risk to local authorities that may not be able to “satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period”, particularly given the mounting requirement to deliver housing at higher regional levels than the recent past. The policy as currently drafted, does not recognise the positive advantages that an appropriate review of the Green Belt may offer in terms of housing land availability, if certain non-performing parts of the Green Belt are released in the right circumstances, in accordance with the directions of the NPPF. This is especially the case for brownfield land opportunities that may exist.

Paragraph 111 of the NPPF directs that planning policies should encourage the effective use of land by re-using land that has been previously developed. The Draft policy not only removes the ability to “de-designate” Green Belt land, but goes beyond this, inferring that there should be no development in the Green Belt at all. This is expressed in the Draft supporting text, which although it acknowledges that not all parts of the Green Belt provide significant benefits, as they have become “derelict and unsightly”, also states that “this is not, however, an acceptable reason to allow development to take place.” This wording is worrying, as it implies that, contrary to the NPPF, any development, even that which is in the exceptions list to “inappropriate development”, is prohibited by the London Plan.

Our client welcomes the radical increase in housing numbers in the Draft Plan, but the ability to deliver such a quantum of sites within the built-up boroughs of London will be exceptionally difficult to provide because sufficient sites are not readily available. There are however, a magnitude of unsavoury brownfield sites within the Green Belt that are potentially available. Such sites present a significant opportunity if planning policy takes a more positive approach to support their short term release. In such instances, there is scope for environmental enhancement which can bring about much improved quality of life for local residents. The release of modest pockets of brownfield land within the Green Belt may offer a relatively small amount of the required future housing supply but a very important contribution nevertheless. The London Plan must not be overly prohibitive in terms of restricting all development in the Green Belt, especially in relation to brownfield redevelopment opportunities.

Our client therefore strongly urges that the wording of this policy and its supporting text be reviewed, to ensure that a flexible stance is adopted, to comply with the NPPF.

User:	Buckinghamshire County Council

The County is constrained by the Green Belt and the Chilterns area of Outstanding Natural Beauty both of which provides essential green and open spaces as well as leisure and recreational opportunities for Buckinghamshire and large parts of London. BCC welcomes the Mayor's commitment to 'protecting and enhancing the environment – including the Green Belt and other designated green spaces' as well as the acknowledgement of the role that such areas play in the health and well-being of people.

User: Mr Geoffrey Lean

This approach to the Green Belt is enormously welcome, including its acknowledgement of permanence as an essential characteristic, and the understanding that the poor quality of some if it is a reason to enhance it and not -as so many argue - to develop it.

It is extremely important that Policy G2 clearly stipulates that de-designation of the Green Belt will not be supported, while enhancment will. However, given the rapily mutiplying threts to the Metropolian Green Belt, the policy should state that a presumption against its loss will be vigorously enforced.

The policy also contrasts with a much more cavalier attitude to the Green Belt in some local authorities outside London. Tandridge and guildford, for example, are both promoting major developments in it - in Tandridge's case effectively a new town (dubbed a garden village) that would set an appalling precedent for the Metropolitan Green Belt as a whole. London should engage with such authorities to try to persuade them to adopt a similar approach to the one in this Plan: otherwise the effect of its own policies will be much reduced by increasing Green Belt development once its boundary is crossed.

User:	Mrs Hilary Gander

I welcome Policy G2 especially the proposal in Policy G2B that ‘de-designation’ of Green Belt will not be supported. This policy needs to be reinforced so that there is a presumption against the alteration of Green Belt boundaries which reduce its extent should be included in policy G2B.

User:	Mrs Val Elliott

Hillingdon is on the edge of the Green Belt and has green corridors that enable wildlife to migrate between open spaces. These areas will come under increasing pressure from developers with the need to meet unrealistic housing targets.

User:	Janice Berman

I strongly disagree with building on Green Belt. I live in Enfield and I am concerned about pollution and global warming. Any further encroachment on the Green Belt will add to the pollution and poor air quality in this Borough. We already have a large number of large building projects in this area that are contributing to chronic road congestion, and over use of medical and other facilities.

User: The Open Space Society

Add: Boroughs should investigate how public access on foot, horseback and bicycle can be improved, by encouraging landowners to dedicate new paths and public access land.

Explanation: As noted on 8.2.2, the Mayor will work with boroughs etc to enhance access to the green belt. Clearly the Mayor recognises that the green belt is a wonderful resource for public aces and enjoyment, but to maximise its potential, we need paths which connect up into longer routes, which provide safe crossing for busy roads, and which enable people on foot, horse and cycle to be separated from vehicle traffic, and we need places where people can roam freely. If landowners are encouraged to dedicate land as town or village green (see below) or as access land under section 16 of the Countryside and Rights of way Act 2000, there could be more public access and available.

User:	Putney Society
We support this policy.	

User: Telegraph Hill Society

Policy G2 Objection

We strongly object to this policy. We do not believe that the protection of the Green Belt is desirable and the consequences of its protection, if the Mayor persists in a policy of catering for the needs of all potential Londoners within the existing confines of the Green Belt, is detrimental to those living in Inner London.

We set out the reasons for our objections in our comments on Policy GG2D as follows:

Much of the Green Belt is of low quality land and can be built upon with detriment. Retaining the Green Belt, as this proposed plan requires, imposes higher housing requirements on areas which are already reaching capacity and which, particularly in Inner London, will be to the detriment of existing residents. We cannot see, for example, how building on garden space in Inner London whilst retaining Green Belt in Outer London (to which many Inner London residents have no access whatsoever) can be said to improving the quality of life of those living in inner London. The proposed approach of retaining the Green Belt is therefore divisive (benefiting Outer Londoners to the detriment of Inner Londoners) and conflicts with GG1.

We note that, in para 8.2.2, there is a proposal that “The Mayor will work with boroughs and other strategic partners to enhance access to the Green Belt”. This will have little or no impact on the lives of Inner Londoners who are most affected by the constraints that this proposal introduces. The Green is an hour’s journey time away from their homes if, indeed, they can afford to travel to it.

User: Home Builders Federation

The policy is unsound because it conflicts with national policy.

The NPPF requires local planning authorities to establish their Green Belt through the preparation of Local Plans (NPPF, paragraph 83). This allows for Green Belt boundaries to be altered in exceptional circumstances through the preparation or review of the Local Plan.

The draft London Plan – going further than the current London Plan (as well as previous iterations) – removes this ability by stating that de-designation will not be supported.

We do not agree that the Mayor can remove the ability of local planning authorities to review their Green Belt, including the potential for de-designation, through the draft London Plan. Nor do we consider that the Mayor's planning powers extend to the extent that he can remove this option through the draft London Plan.

The London Plan is not a Local Plan as the Mayor is anxious to remind people. The Mayor, therefore, cannot remove requirements of national planning policy that relate to Local Plan making that local planning authorities will need to consider when they are planning for the development needs of their area. There may be exceptional circumstances where a London LPA decides that the re-drawing of the Green Belt is necessary and justified to accommodate development needs in a sustainable way. The NPPF allows a local planning authority to do this through its Local Plan (NPPF, paragraph 83). While the Mayor may set strategic policies that aim to reduce the likelihood of Green Belt being amended, it is for each local planning authority to decide the most sustainable approach to delivering development in its area. As with the Duty to Cooperate, it is for each local authority to consider how its development needs can best be accommodated when preparing its Local Plan.

The Mayor could only remove this discretion if all the London LPAs voluntarily agreed that he should undertake this function collectively on their behalf. Even then, the Mayor would only be able to define the broad extent of the Belt. When the Green Belt was first established through County Structure Plans the extent of the Belt still had to be defined in the Development Plans. Only the Local Plan can define the extent of the Green Belt.

To be able to make policy on the Green Belt for Local Plans – in order for the Mayor to definitively rule-out the possibility of the release of Green Belt land during the life of the London Plan – the Mayor would have to undertake a strategic Green Belt review of all of London's Green Belt in order to define its boundary (NPPF, paragraph 81). Any enhancement activities relating to the Green Belt, such as those described in part A 2) of the policy, could only occur once the Green Belt has been defined. However, because the Mayor has not defined the Green Belt, he cannot direct that Green Belt is amended, or not amended, through the draft London Plan. This is the responsibility of each local planning authority with a Green Belt. It is they who will have to decide how best to meet their development needs in the most sustainable way. Moreover, it is they who will have to agree Green Belt boundaries with their neighbouring authorities in the WSE.

A related but secondary point, is that the review of the Green Belt cannot be a one-way process as the current draft policy implies. The Mayor is wrong in arguing in part B that the Green Belt can be increased but not decreased, or, that Green Belt release can be compensated for by new designations elsewhere. The Mayor could only conclude that the Green Belt could be increased and new designations made after having undertaken a strategic Green Belt review which defines the Green Belt in the draft London Plan. Until he has done so, and until he has the authority to do so, the London boroughs cannot be fettered in this way. They are responsible for defining the Green Belts through their statutory Local Plans, not the Mayor.

Furthermore, a strategic Green Belt review would need to involve a conversation with some of the authorities of the Wider South East (WSE) because the delineation of the Green Belt boundary might have to involve discussions with those WSE authorities who occupy the outer edge of the Metropolitan Green Belt, and where they may be effected by any decisions on the location of development. These WSE authorities may

want to release Green Belt land to meet their housing needs. The Mayor's policy fetters them in this respect as they may need to define a new Green Belt boundary with the cooperation of the London boroughs. The Mayor does not have the authority to fetter the authorities of the WSE in this way.

This then raises a further point. Because the Mayor is not responsible for the Duty to Cooperate (although he ought to be if the draft London Plan was truly a strategic plan) he cannot make policy on the Green Belt in any reasonable or practical sense. He cannot make policy on the Green Belt in any reasonable or practical sense because he is unable to manage the strategic cross boundary discussions with the WSE that would need to occur through the Duty to Cooperate if the Green Belt was to be altered. Because, they Mayor claims he is not lawfully responsible for the Duty to Cooperate, he cannot shape policy on the Green Belt. If the Mayor wishes to make policy on the Green Belt he must assume responsibility for the Duty to Cooperate (on behalf of all 35 LPAs of London). This is because the Duty to Cooperate would have to be engaged as a consequence of an LPA in the WSE wishing to amend its Green Belt boundary.

Part B of the policy, therefore, should be re-drafted to reflect the national policy:

"B In preparing their Local Plans the Boroughs will:

1) extend the Green Belt in exceptional circumstances;

2) de-designate land in the Green Belt in exceptional circumstances."

Better still, because the suggested amendments add nothing of substance, because the Mayor has no remit here, it should be deleted.

This all points to the major failing with the draft London Plan. It is not a strategic spatial plan at all. It is just a big local plan that interferes too much in the detail of the work of the London boroughs.

User:	EngineersHRW

Policy G2 London’s Green Belt

Note: The continued protection of London’s Green Belt is strongly supported.

User: Bracknell Forest Council

Green Belt

The Council recognises the importance the government attaches to the protection of the Green Belt. However in the context of a plan that does not propose to meet all its housing needs it is not considered a sound approach to seek the blanket protection of the Green Belt as proposed by Policy G2 in the absence of Green Belt review. The lack of a proper review of the Green Belt and the extent to which the land within it contributes to the purposes of the Green Belt means that this policy approach is not supported by any evidence. It is particularly inappropriate to adopt this approach when many planning authorities around London (including Bracknell Forest) are undertaking such reviews and in some cases removing land from the Green Belt in order to meet their development needs.

User:	The Pinner Association
Support – but concerns re [A] (2) as to what may be regarded as “*appropriate multifunctional uses*".	

User:	Butterfly Conservation
The absolute protection of green belt land is strongly supported (improvement over FALP).	

User: Dartford Borough Council

Draft London Plan content

Policy G2

Dartford Borough Council's position

COMMENT

Further notes

The need for appropriate protection of the metropolitan Green Belt, both within and outside Greater London is recognised by Dartford Borough Council. In places, such as the Cray and Darent Valleys adjoining the Thames Estuary, any relaxation would lead to unsustainable urban coalescence.

However, a London Plan which is rigid and does not allow for flexibility at the local Borough level to provide for sustainable development in the most appropriate way risks an increase of development pressure on the metropolitan Green Belt as a whole. In this context, there is concern about Policy G2, which allows for no flexibility for the de-designation of Green Belt by London Boroughs at the Local Plan-making stage and supports extension of the Green Belt. It introduces a very different level of protection of the Green Belt within London to that which will apply to Green Belt outside the Greater London boundary; despite all being the same metropolitan Green Belt. This is inequitable. On this strategic issue there should be consistency and fairness (between Greater London and outside) over the policy that applies when Local Plans are reviewed. The policy is in conflict with the NPPF which requires authorities to consider their Green Belt boundaries at the plan-making stage.

User:	Martyn Cresswell

I am totally opposed to any lifting of the protection of all Green Belt land surrounding London.

User:	London Green Belt Council

We are pleased that the Plan makes clear the actual goals of the Metropolitan Green Belt and acknowledges that: “Some parts of the Green Belt do not provide significant benefits to Londoners as they have become derelict and unsightly [but] … this is not an acceptable reason to allow development to take place. These derelict sites may be making positive contributions to biodiversity, flood prevention, and reducing the urban heat island effect. The mayor will work with boroughs and other partners to enhance access to the Green Belt and to improve the quality of these areas.” This is a very important approach and one which the LGBC warmly welcomes. We are concerned that some land owners are deliberately allowing Green Belt land to become derelict in order to put pressure on local government to allow development.

User: Galliard Homes

Policy G2 – London’s Green Belt is believed to be unsound. The NPPF requires LPAs to establish their Green Belt boundaries and alter them only in exceptional circumstances through the preparation of their Local Plans. The Plan, goes further than the adopted London Plan and removes this ability by stating that de-designation will not be supported.

As stated by the HBF, we do not agree that the Mayor can remove the ability of LPAs to review their Green Belt, including the potential for de-designation, through the Plan. Nor do we consider that the Mayor’s planning powers extend to the extent that he can remove this option through the Plan.

Part B should therefore be reworded to reflect national policy:

`B In preparing their Local Plans the Borough will:
1. Extend the Green Belt in expectional circumstances;
2. De-designate land in the Green Belt in exceptional circumstances.’

User: LFoSR - The London Federation of Sport and Recreation

Policy G2: "Green Belt" makes it clear that the Green Belt should be protected from inappropriate development and, crucially, point B states the Mayor will not allow de- designation of the Green Belt.

This is very positive for outdoor sports facilities and playing pitches located in the Green Belt. Not allowing de-designation will have a significant impact on Local Plans as local authorities will no longer be de-designate Green Belt or allow "land swops" to move land in and out of the Green Belt. The strong protection for the Green Belt (and also MOL, but see below) ironically means that green space and playing fields not designated as such will almost certainly be under more pressure (although areas of open space deficiency are protected in Policy G4). So, outer London boroughs with large areas of open space / playing fields (and a surplus of the same) will be tempted (even encouraged) to release some of that land for development.

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Policy G2: "Green Belt" makes it clear that the Green Belt should be protected from inappropriate development and, crucially, point B states the Mayor will not allow de- designation of the Green Belt.

This is very positive for outdoor sports facilities and playing pitches located in the Green Belt. Not allowing de-designation will have a significant impact on Local Plans as local authorities will no longer be de-designate Green Belt or allow "land swops" to move land in and out of the Green Belt. The strong protection for the Green Belt (and also MOL, but see below) ironically means that green space and playing fields not designated as such will almost certainly be under more pressure (although areas of open space deficiency are protected in Policy G4). So, outer London boroughs with large areas of open space / playing fields (and a surplus of the same) will be tempted (even encouraged) to release some of that land for development.

User:	The Royal Society for the Protection of Birds (RSPB)

The RSPB does not generally comment on Green Belt policy. We do, however, support more positive use of London's Green Belt in respect of biodiversity protection and enhancement and access to nature in line with the aims of the NPPF. This should be a prerequisite, underpinning the overarching commitment to protecting London's Green Belt in the draft London Plan.

Suggested amendments to policy G2 [additions in bold, italics]

Include supporting text 8.2.2 in Policy G2 itself:

'The Mayor will work with boroughs and other strategic partners to enhance access to the Green Belt and to improve the quality of these areas in ways that are appropriate within the Green Belt, ***through for example, biodiversity enhancements.'***

User:	The Royal Society for the Protection of Birds (RSPB)

Suggested amendments to policy G2 [additions in bold, italics]

Include supporting text 8.2.2 in Policy G2 itself:

‘The Mayor will work with boroughs and other strategic partners to enhance access to the Green Belt and to improve the quality of these areas in ways that are appropriate within the Green Belt, ***through for example, biodiversity enhancements.’***

User: Simon Saville

Policy G2

I welcome Policy G2, particularly the proposal in Policy G2B that "de-designation" of Green Belt will not be supported. This needs to be reinforced for it to be effective.

Proposed change

? A presumption against the alteration of Green Belt boundaries that reduce its extent should be included in Policy G2B so that it reads:
"The extension of the Green Belt will be

supported and its de-designation will not. We will enforce a presumption against the loss of Green Belt".

User: Royal Town Planning Insitute

We strongly support enhancements to the Green Belt to provide appropriate multi-functional uses for Londoners. Green Belt is an urban containment tool and not an environmental designation but that does not mean that it cannot be invested in to provide environmental enhancements. Too often parts of the Green Belt are argued to be expendable because they are in poor condition. If particular parts of the Green Belt are not considered to be in good condition, this is not necessarily a reason to de-designate them. Instead it can often be a reason to invest in them. The Natural Capital Commission found planting trees on the fringes of cities to be amongst the most economically efficient projects.

However, the RTPI is concerned with policy G2 and GG2(C) supporting extension of the Green belt but not allowing de-designation. As we state in our policy paper 'Where we should build more housing', land within existing built up areas will not meet all our needs and Green Belt designation should be just one consideration when making decisions about development. The experience of our members clearly indicates that housing can be built in the Green Belt without undermining the priority to be given to brownfield sites. If it is done through a planned, managed and phased approach to development.23 Furthermore this policy may be in conflict with national guidance, which gives local planning authorities responsibility for reviewing Green Belt Boundaries through Local Plans, and advises not including land "which it is unnecessary to keep permanently open".

A managed approach to urban expansion, whilst avoiding urban sprawl around our major cities, has been successfully achieved through planning policies such as Green Belt. The planning profession has championed this policy for over 60 years. But it is important to revisit the purposes that Green Belt need to fulfil over the coming generation. The value of Green Belts is not simply about what is ugly and what is attractive, as some argue. Indeed, the name 'Green Belt' itself may be a part of the problem - neither in reality or in planning policy is the Green Belt the rural vision conjured by the name.
48. We need to talk about who green belts are for, and about their social impact, along with their continued role in shaping and managing urban growth. Green Belt boundaries may well need to change, but only through careful reviews over wider areas than single local authorities, and where safeguards are put in place to ensure that development is sustainable, affordable and delivered in a timely manner, and without prejudice to the renewal of brownfield land.

We believe the best solution would be for the GLA to spearhead a review of the whole London Green Belt, in order to take a strategic overview. The Outer London Commission made similar conclusions in 2016, arguing that the Mayor should coordinate the reviews of local authorities, including by providing "consistent methodology/principles to coordinate and provide a strategic dimension to boroughs' local

Green Belt reviews”.24 Even if it does not provide this, the London Plan should certainly not block individual local authorities whoare willing to conduct their own reviews alone or in collaboration with neighbouring authorities. Especially given the ambitious housing targets outlined in the plan, and concerns about meeting them, it seems unjustified to rule out Green Belt development. Not all Green Belt meets the purposes set out in national planning policy. Even where land does fulfil these objectives, it is not Green Belt should automatically be set above all other considerations in achieving sustainable development.

User:	Adrian McLoughlin

Dear Sir , please do all you can to protect the green belt.

See if it is possible to recycle or use brown field sights.

User:	Gatwick Diamond Group of Authorities

The Gatwick Diamond authorities recognise the importance of the metropolitan green belt and metropolitan open land in London. However the Mayor has ruled out any consideration of a review of green belt within London. It is unclear if this is intended to be binding upon the local plans produced by the London boroughs. In any event, this would seem to be contrary to the National Planning Policy Framework and the draft revised National Planning Policy Framework (5 March 2018).

Outside of London and consistent with the NPPF, councils are required to consider and justify the green belt boundaries in appropriate circumstances, which may include meeting objectively assessed needs. The precedent has been set in many local plans. The Gatwick Diamond authorities consider that an objective, evidence-based approach is also appropriate within London and the case for not doing so seems to be based on a political rather than an objective judgement. This requires attention and the Gatwick Diamond authorities are happy to assist the adjacent London boroughs with an appropriate joint review.

User:	Brian Woods

I would like to urge the greatest possible protection for existing Green Belt areas which cannot be recovered once lost to “development”.

I object to any swap justifications and claims of”low grade” green belt being judged not worth saving.

User:	South East Strategic Leaders

Areas outside London are under pressure to commit to, and undertake, Green Belt reviews in order to accommodate high levels of growth; this approach should be consistent across all Green Belt authorities including the GLA and London Boroughs.

Large parts of the wider South East are subject to environmental and other constraints, some of which cover significant areas. These include, for example, Green Belt, Areas of Outstanding Natural Beauty and land at risk of flooding. Such designations, whilst valuable in their own right, restrict the ability of local areas to meet their own identified housing needs. This will limit, if not eliminate, the potential for many areas to accommodate London's growth.

The significance of paragraph 84 of the National Planning Policy Framework (NPPF), and in particular the need to "promote sustainable patterns of development" when reviewing Green Belt boundaries, should not be under-estimated; it has been a key issue in a number of local plan examinations1 . It is not clear how the draft Plan accords with the NPPF on Green Belt.

User: Martin Luxton

As a resident Londoner (born and bred) I feel I must write to convey how strongly I feel about the importance of strictly preserving our green belt.
Having had the pleasure of utilizing these open spaces and peripheral countryside all of my life, it is only right and proper that my children and grandchildren inherit and enjoy the same.
I urge you to keep London a great city - preserve and respect our green belt. Thank you.

User:	London Tree Officers Association
The LTOA broadly supports this policy	

User:	London Borough of Barnet

Barnet welcomes the continued strong policy protection afforded to the Green Belt and support for its extension where appropriate. However, we note that de-designation is not supported and that an apparent stronger policy stance is proposed than that set out in NPPF. To inform the emerging Local Plan Barnet is currently undertaking a study of its Green Belt and MOL and, in line with the NPPF, wants to reserve the right if necessary to make Green Belt boundary changes via Local Plan process where they can be justified.

User:	Amy Luff
•	Protecting the Green Belt requires stronger enforcement.

User:	Thames Water

Several of our large infrastructure sites are located in areas designated as Green Belt and they will need to be upgraded to meet our future requirements.

Policy G2 should be amended to read:-
‘Some of London’s utility infrastructure, such as reservoirs and treatment plants are also designated as Green Belt land and will require upgrading to meet the requirements of population growth, climate change and environmental regulations.’

User:	Norman Ross

Enfield is too over populated already, car parking (or the lack of it) has become a nightmare.

LEAVE THE GREEN BELT ALONE.

User:	M Bush
Please keep it green belt and don’t build it’s just such a shame we need green space to help with depression and open space just makes people happy. Especially children	

User: London School of Economics

Policy toward the London Green Belt is clearly bound up with the issue old spatial development patterns, and with the choice of a sustainable intensification option (in chapter 2 of the draft), both in relation to the idea of selective release within London, and with challenges facing potentially willing partners outside London in accommodating prospective growth there – maybe in areas where Green Belt is a constraint.

In our view it is wrong for the Plan simply to dismiss a review of green belt policy, without a more open discussion of the implications. As the Plan reminds us, “London’s Green Belt makes up 22 per cent of London’s land area”. In a city with a severe housing crisis over one fifth of all land is being immediately ruled out of consideration, even though significant parts may not make real contributions to the green environment.

There are social issues at play too that the Plan should recognise. As brownfield land and green belt is not evenly distributed across London, the impacts of intensification and protection are not distributed evenly. This is further exaggerated by conservation areas that also limit where intensification can happen. In relation to its ‘good growth’ principles, the Plan should take account of the social effects of the uneven distribution of opportunities for intensification on brownfield and preservation of green belt land. In some boroughs with green belt, an effect is to heavily concentrate the impact of development in poorer parts of the borough. Parallel issues effects arise at an inter-borough scale. Moreover, in environmental and efficiency terms, we should want to make the fullest use of public transport infrastructure but green belt sometimes stops us building on land near to Underground stations, as at the eastern end of the Central Line.

While the costs of green belt are ignored the claims made in its favour are sometimes specious, and certainly not applicable to all areas with this protected status. In relation to recreation, most of the green belt is not accessible to the public because it is private land. Indeed, continued protection of all green belt might well lead to less access to open space if, instead of building on private green belt land, we develop public sports fields. The Plan should evidence how leaving green belt unreformed will lead to greater access to green belt land. Otherwise we could reform green belt while maintaining those parts that provide public access.

There are similar issues in relation to use of land for food growing (which is meant to be encouraged), but where allotments are put at risk. As the majority of green belt is private land, the Plan should substantiate its claim of the green belt as a resource for local food production by setting out how it will seek to control privately owned green belt land to achieve this. It should set out where in the green belt it plans for this to happen.

Claims that green belt can provide protection against urban heat islands are similarly questionable. Significantly and correctly this is not

mentioned in the GLA’s review of the subject, since the research literature shows that heat island effects are localised. Maintaining the green belt is actually likely to create more local heat islands across London as limiting the amount of land available to build on forces much higher density development on the land that is available. These local areas of much higher density development create canyon effects and other features that produce local heat islands. Linking green belt to the prevention of heat islands, appears to be particularly spurious – reference to this should be removed, if it cannot be clearly supported by evidence.

User: Sevenoaks District Council

Green Belt and Housing Need
The Mayor, through the draft London Plan, has expressed his commitment to protect the Metropolitan Green Belt from further development within the London boundary. This is a welcomed proposal as it demonstrates the Mayor's commitment to developing brownfield/previously developed sites across the capital. As a local authority with one of the highest proportions of Green Belt (93%) in the country, we endorse this approach of meeting the capital's housing need.

However, it is clear that the draft London Plan is planning for 65,000 additional homes a year which is just short of the 66,000 homes a year to meet the capital's need. This will result in a deficit of a minimum 20,000 additional homes across the Plan period. While there is a commitment to protecting the Green Belt, the policy G2 "London's Green Belt" appears to be more prescriptive than national policy and may reduce the ability of London Boroughs to plan their own delivery of homes to meet their own needs. As a result, local authorities immediately outside of the London could be expected to accommodate a higher proportion of housing in their own areas, which is not acceptable.

Last year, SDC consulted on its Local Plan Issues and Options document; the first stage in our plan-making process. The document set out our commitments to protecting the Green Belt from development by setting out our preferred approach of developing brownfield land in sustainable areas. This approach will be taken forward as part of our draft Local Plan consultation which will be consulted on in spring/summer this year. Details of our Issues and Options consultation and preferred approach to development in Sevenoaks District can be found at www.sevenoaks.gov.uk/localplan.

User:	Martin Cartwright

The existing Green Belt policy as defined by wording in the National Planning Policy Framework has been very effective in preventing inappropriate development in the Green Belt. Any weakening of current Green Belt policy will not result in more efficient use for community benefit whateve that means) but instead be the subject of speculative development proposals by the development industry. This wording should not be changed.

User: London Assembly Planning Committee

Recommendations We fully support the Mayor’s continued protection of the Green Belt. As London becomes more intensively developed the Green Belt will become ever more important. Policy should enhance as well as protect the Green Belt. The Mayor might wish to signal how a “21st Century Green Belt” could offer more strategic benefits to London. Policy G2 could outline how the Green Belt is fulfilling valuable functions in relation to London’s strategic challenges and relevant Mayoral strategic objectives. These might include more food production, better contributions to climate change mitigation and adaptation, a source of sustainable water storage, and so on.

9.1 The Assembly fully supports the Mayor’s continued protection of the Green Belt in Policy G2.

9.2 The Green Belt comprises 22 per cent of London’s total area. The London Plan strongly supports the protection, promotion and enhancement of London’s open spaces and the protection of the current extent of London’s Green Belt and Metropolitan Open Land.

9.3 The National Planning Policy Framework (NPPF) consolidates the Government’s view on its planning priorities and guidance. It attaches great importance to Green Belts, but recognises that they are capable of being reviewed in exceptional circumstances, through the review of the Local Plan. The Assembly has noted that a number of London boroughs have reviewed, or are reviewing, their Green Belts.

9.4 Some commentators have recently called the role of the Green Belt into question,76 and have pointed to areas where it may have failed to adequately perform its functions as set out in legislation. To resist this pressure, supporters of the Green Belt need to ensure that its original purposes are being served.xxii

9.5 More significantly, if a 21st Century Green Belt could offer more strategic benefits to London it might be able to resist pressure for development. Counter arguments could then be made that it is fulfilling valuable functions in relation to London’s strategic challenges. These might include more food production, better contributions to climate change mitigation and adaptation, a source of sustainable water storage, and so on. By performing a new range of strategic functions, as well as its original purpose, it may be easier to justify its retention in the face of housing demands.

User:	London Borough of Ealing

We understand and appreciate the policy imperative of protecting London’s green infrastructure but we believe that the Mayor policies are far too inflexible and they do not deal with the practical realities on the ground. The recommendations of the Outer London Commission in their sixth report ‘Removing the Barriers to Housing Delivery’, March 2016’ to conduct a strategic, London wide review of Green belt and Metropolitan Open Land have not been followed through and this presents perhaps a missed opportunity. The conflation of these two policy designations also creates clear anomalies and the plan should provide greater clarity about their respective roles and functions that also take into account a qualitative assessment.

User:	Bexley Labour Group

The group welcomes the confirmation and strengthening of Green Belt protection. We would welcome the opportunity to strengthen powers over developments on parks and open spaces, following the decision of the London Borough to Bexley to build homes on the borough’s parks and open spaces.

User:	London Borough of Haringey

The Council supports the protection of Green Belt Land where robust, up-to-date Green Belt studies identify land as continuing to serve Green Belt purposes (consistent with the NPPF). Policy G2(B) is however considered to be inconsistent with the NPPF, as the statement that ‘de-designation of Green Belt is not supported’ makes no reference to the NPPF requirement that Local Plans need to be justified by evidence and Green Belt boundaries should be capable of enduring beyond the plan period.

User:	London Borough of Barking & Dagenham

The Council supports the continued protection of London’s Green Belt. However, the Council considers that unless the Mayor addresses the borough’s concerns on the industrial land and small sites policies then the Green Belt will come under more pressure from developers, challenging the borough’s ability to meet their five-year housing land supply requirement. A more realistic small site target and a more flexible approach to employment land will help support the Mayor’s aim to continue the strong protection of the Green Belt and Metropolitan Open Land.

User:	London Borough of Lewisham

We acknowledge G2’s continued protection for the Green Belt. We feel that this will place additional burdens on inner London boroughs to accommodate the level of housing to meet London’s need. We therefore promote a more balanced approach which also relies on releasing parts of London’s Green Belt in a strategic and planned manner.

Further consideration should also be given to providing appropriate multifunctional uses for Green Belt that is judged as having a low ecological value in order to address pressure on existing public open space in urban areas.

User: London Borough of Brent

Whilst the Council generally supports the national policy approach to the Green Belt, which allows Councils to review Green Belt boundaries through Local Plan reviews as appropriate, the Council does not agree with this London Plan policy approach which seems to rule out the possibility of local determination. The Council agrees with the statement in paragraph 8.2.2 that "some parts of the Green Belt do not provide significant benefits to Londoners as they have become derelict and unsightly".

In considering approaches to the location of new housing across London, the Mayor should properly balance the character of suburbs with the national policy objectives of the Green Belt.

User:	London Borough of Bromley
The Council supports this policy which continues the GLAs approach of protecting London’s Green Belt, in accordance with the NPPF.	

User:	Orpington Field Club

Members were pleased to see the importance given to the protection of the green belt. Much criticism of NIMBYism is written about in the press, but inner London children have a right to access the countryside which is increasingly denied to them as London expands and when green belt land is built on but they and their families are not allowed to comment on planning proposals in these outer London areas.

User: Royal Borough of Kingston

2.1 RBK recognises the significant challenges of meeting London's housing need within an often dense urban form and constrained by the Green Belt. RBK supports good growth, and jointly published Kingston's Direction of Travel with the Mayor. However, the reliance on the small sites approach to, in the case of RBK, double the housing target is flawed and undeliverable, with severe consequences for the borough which will undermine the delivery of growth. The addition of the small sites effectively doubles the borough's housing target, and well above the current average annual delivery by 300%.

2.2 Delivery of new homes through the small sites approach makes up a very large proportion of the new homes targets, particularly in Outer London boroughs. This is a very significant increase on windfall sites, most of which will not deliver affordable housing. The overall strategic approach will impair the borough's ability to secure affordable housing alongside market housing and significantly lower the overall proportion of new homes that come forward in affordable tenures. In Kingston, for example, almost half of the housing target would come from sites that are not delivering affordable housing.

2.3 The number of small sites anticipated represents a 90% increase on current delivery. It is accepted that there may be a latent demand for this type of intensification which is currently hidden due to discouraging local policies. However, evidence from Croydon, which has strong policies and local agencies to promote intensification suggests that the levels of intensification assumed in the London Plan are unrealistic.

2.4 The plan directs significant growth to local town centres and suburbs, which will alter the character of these areas significantly. The small sites approach, which covers approximately 90% of the developable land in Kingston, would drive a significant shift from houses to flats. This is accompanied by strengthened Green Belt and Metropolitan Open Land (MOL) policy protections. Alternative approaches have not been properly considered and there has been no meaningful engagement with local communities at a grassroots level. This includes consideration of whether there are any areas of Metropolitan Open Land or Green Belt across London where development could be realised in a way which minimises harm and at the same time reduces the scale of impact on London's town centres and suburbs. The IIA considers 'options' in a shallow and binary way which does not suggest proper consideration of a *range* of approaches to deliver housing - rather a mechanistic application of the small sites approach to make up the shortfall between the capacity identified through the London Development Database and London's housing need. It is clear that communities place immense value on their Green Belt and Metropolitan Open Land. However, they also value their suburbs, gardens and town centres.

2.5 The small sites approach is premised on good public transport accessibility. However, this suggests a flawed understanding of Outer

London. Appendix 2 shows that in Kingston, much of the areas subject to the small sites presumption have relatively poor public transport accessibility. If retained, the policy should be amended to only include those areas with a PTAL of 3 or more. The criteria for refusal under the presumption is also limited to a very narrow set of criteria, but excludes design quality, overshadowing, access to outdoor amenity space, noise, energy efficiency, internal layout and space standards and transport issues. It is considered that the exclusion of significant sections of the London Plan and local plans is unacceptable and exceeds the legislative powers of a Spatial Development Strategy. Moreover, it would result in poor quality accommodation, giving rise to detrimental health and well-being outcomes and the erosion of the quality of neighbourhoods. It is entirely unacceptable to suggest that a poor development would not be able to be refused on grounds of poor design. It is also noted that flat conversions are often the least satisfactory type of home in terms of the quality of the living accommodation, and such developments should therefore be subject to more rigorous assessment, rather than less.

2.6 Rather than make housing available, this approach may in reality drive up house prices as the market value of a family home is re-assessed as the value of a development site with multiple housing units. There does not appear to include any assessment of the impact this approach may have on the affordability of family housing in the Integrated Impact Assessment.

2.7 The outcome of undeliverable housing targets is that boroughs will fail to deliver the required numbers of homes, as assessed through the Housing Delivery Test, and fail to adopt new local plans to plan for growth due to the soundness test of ‘deliverability’. This will be exacerbated by the significant windfall reliance, sites which are unlikely to contribute to the 5 - 15 year housing land supply. Both of these outcomes will diminish local authorities’ ability to deliver good growth (through the ‘tilted balance’ set out in the NPPF and the lack of up to date policies), enabling poorer developments to proceed, and further eroding public confidence in the planning system to deliver good growth. These outcomes are the antithesis of what the new London Plan should, and needs to, deliver. RBK is also concerned that, depending on the outcome of national changes, these targets could impact on local authority finance in relation to the New Homes Bonus and planning fee increase, further reducing the availability of funding to deliver planning services. It is currently unclear whether or not this income will be linked to a local authorities’ housing target, or different measures.

User:	London Borough of Tower Hamlets

We are sympathetic to the Plan’s broad policy objective to meet London’s growth within London’s boundaries. However we do not consider this to be the most sustainable spatial strategy. We consider that the GLA could undertake a strategic review of the greenbelt with a view to releasing low quality and well-connected areas for planned growth. This could help make transport provision in outer London more sustainable as well as reduce the risk of over development in central London.

User: Royal Borough of Kingston

5.0 Protection of the Green Belt and Metropolitan Open Land (MOL)

5.1 The new plan designates a ‘nascent’ Opportunity Area for Kingston to bring forward 9,000 homes and 5,000 jobs over the next 15+ years. The text for this Opportunity Area is inconsistent with the stronger Green Belt and MOL protections as it identifies Chessington and the Hogsmill as areas where there *“may be potential to accommodate growth… in line with the opening of Crossrail 2 in 2033”* . These are areas with significant Green Belt and MOL designations which is inconsistent with accommodating growth as per London Plan policy.

5.2 The Green Belt policy is inconsistent with national policy as it is more restrictive. It does not allow any de-designation of Green Belt through a local plan, whereas national policy allows for de-designation in exceptional circumstances. Similarly it requires development that causes harm to be refused, whereas national policy allows such development to be approved in very special circumstances when the harm is clearly outweighed by the benefits.

5.3 The policy on Metropolitan Open Land (MOL) has different criteria than the policy on Green Belt in relation to alterations to the boundary through the local plan process. There is ambiguity regarding the reference to applying “the principles of” national Green Belt policy in the supporting text, because the MOL policy does not allow planning permissions which harm the MOL to be granted in very special circumstances which national Green Belt policy does.

5.4 RBK considers these policies to be internally inconsistent and, in the case of Green Belt, inconsistent with national policy.

User: Royal Borough of Kingston

The proposed policy G2 is inconsistent with national policy as set out in paras 79-92 of the NPPF.

The inconsistency results from the binary approach to the determination of applications in the Green Belt - a scheme that causes any harm in the Green Belt must be refused. This is inconsistent with national policy which allows developments to cause Green Belt harm in very special circumstances when the harm (Green Belt and/or otherwise) is clearly outweighed by the benefits of a scheme.

Ambiguity is created by support for “appropriate multi-functional uses”, which is a reference to national policy which recognises that Green Belt should be enhanced through beneficial uses. However, the ambiguity arises as uses which enhance the Green Belt in terms of some of its purposes may still cause harm as measured against other Green Belt purposes. Conflict is very likely to arise between the different elements: it is evidently possible that a proposal for multi-functional uses could cause Green Belt harm. For example, enhancing the use of Green Belt by providing greater access or facilities for outdoor recreation may harm biodiversity, for example. The flexibility of national policy allows the relative harm to be weighed against benefits to provide the outcome which optimises the enhancement of the Green Belt overall: but the removal of this flexibility from the proposed London Plan policy does not allow such balancing to take place.

Further, it is noted that the supporting text refers to some of the useful functions that exist within the Green Belt, which does not reflect the role of the Green Belt, which is not designated for such useful functions.

A similar conflict exists with this policy in relation to de-designation of Green Belt land, which the policy is clear would not be supported by the Mayor. However, national policy allows this in exceptional circumstances, through the preparation of a Local Plan. Again, this creates an unacceptable inconsistency between national policy and the proposed London Plan. It is noted that failing to allow for appropriate Green Belt review and, in exceptional circumstances, its release through the Local Plan process, removes one option which communities may want to explore as an alternative to very large-scale growth in urban and suburban areas which will otherwise be necessary.

Policy G3 MOL gives rise to similar issues. The current London Plan policy clearly applies national Green Belt policy to MOL, as reflected in the Court of Appeal decision *Lensbury Ltd v Richmond-upon-Thames* . This makes it very clear that MOL should be afforded the same weight as Green Belt and that national policies on Green Belt should be applied to this designation. The proposed MOL policy relegates this to supporting text, introduces significant ambiguity by not fully applying national Green Belt policy tests but rather the “principles”, and creates an internally inconsistent relationship with the main body of the policy. This is likely to reduce the protection afforded by the policy and requires

clarification.

As with Green Belt, MOL policy states that harm to the MOL would result in refusal. This is inconsistent with the requirements of national policy on Green Belt (the ‘principles’ of which will be applied) which allow for very special circumstances and a planning balance of a proposal.

The same inconsistency relating to enhancing MOL also arises due to the lack of flexibility regarding development in MOL which may cause harm may conflict with enhancements (which could have significant benefits for some MOL purposes but result in harm against other purposes).

RBK requests that these policies are comprehensively reviewed to create a clear, useable framework for determining planning applications and developing local plans, consistent with national policy. Where the Mayor considers the approach to be different to, but not inconsistent with, national policy, this should be explained, together with the appropriate approach where conflicts arise. Given significance of these concerns and the degree of change necessary to resolve the issues set out, RBK reserves the right to raise additional matters in relation to the redrafted policy as it is considered necessary for the policy to be substantially altered in meaning and application.

Further ambiguity arises when policies G2 and G3 are considered in the context of the ‘nascent’ Kingston Opportunity Area where, in paragraph 2.1.14 it is stated that after the opening of CR2 “ *there may be potential to accommodate growth in... Berrylands and Hogsmill Valley [and] Chessington.* ” Given the extensive Green Belt and MOL designations in these areas, this appears to suggest that this growth would, at least in part, be accommodated in MOL and/or Green Belt. It is accepted that the OA is subject to a much longer timescale than the London Plan, and particularly than the housing target which is only 10 years. However, this gives rise to internal inconsistency within the document. RBK would be prohibited from reviewing its Green Belt and MOL designations through its local plan process (policies G2 and G3) while simultaneously being required to do so in order to have an appropriate policy framework in place to deliver the OA over the next 15+ years.

User:	London Borough of Waltham Forest

The policy is not in line with the NPPF and the Housing White Paper. Local Planning Authorities can de-designate Green Belt as part of a plan-led process. There is a prospect that we may need to look to de-designate a limited amount Green Belt as part of the Local Plan process in order to meet our housing target of 1,794 homes. This policy should be re-worded to comply with national planning policy.

User: London Borough of Hillingdon

The proposed wording of draft policy G2 is a matter of serious concern. The existing London Plan Green Belt policy mirrors the National Planning Policy Framework (NPPF) text and the current NPPF/London Plan policy wording has been very effective in preventing inappropriate development in the Green Belt.

Any weakening of current Green Belt policy will not in reality result in more efficient use of Green Belt land for uses of community benefit (if this is the intention) but instead be the subject of speculative development proposals by the development industry. The Council therefore strongly objects to the change in wording of the policy. The above issue will be compounded if (as expected) increased unachievable housing numbers place further pressure on Green Belt land to be released.

Policy G2 is vague and lacks precision. It makes reference to 'enhancement', but does not define what this term means. Equally the policy makes reference to ‘appropriate multifunctional uses', but does not define what these uses should be.

This part of the policy could therefore be open to interpretation by developers seeking to develop Green Belt sites and make the Council's position more difficult in resisting inappropriate development.

User: AECOM

AECOM is in favour of **protecting the best quality Green Belt**, as it provides ecological, recreational, air quality, and amenity benefits and assists in meeting long term risks associated with climate change.

The Green Belt is not an environmental protection policy, but a growth boundary. AECOM believes that a multi-functional **green infrastructure network that permeates the city will bring greater urban resilience** in the future, than the existing static Green Belt. This approach supports the objectives of the **National Park City** and Mayor's **Tree Planting Strategy**, which prioritises bringing green infrastructure into the city. In some cases, protecting accessible land close to London, which is of less ecological, recreational and amenity value is putting more environmentally valuable land at risk.

Modernising the purpose of the Green Belt is therefore crucial to balancing ecological quality and future growth. AECOM has identified that of the 515,000 hectares (ha) of Green Belt land, over 63,000 ha is located within 1 mile of a station and is potentially developable (outside of protection or flood risk).

How Can AECOM Help?

Should housing delivery fall below the levels anticipated, a strategic conversation between the GLA and the wider South East within London's functional economic region will need to take place, to ensure housing targets are met. AECOM believe there is a need to require local authorities - working in partnership with the GLA - to undertake a **Strategic Land Function Review** for the whole Metropolitan Green belt, whereby Green Belt land, housing land, Strategic Industrial land (SIL) and ecosystems are reviewed holistically to ensure that land use is optimised across the Capital

AECOM has experience facilitating Duty to Co-Operate and other relevant conversations between planning authorities across the South East, as they seek to plan sustainably on a strategic scale. AECOM could support the GLA in developing the technical evidence base upon which this dialogue would rest.

AECOM could further advise the GLA on how to maximise the potential arising from links to locations across the wider South East suitable for strategic-scale housing growth, without significant Green Belt release.

User: Swale Borough Council

The need for appropriate protection of the Metropolitan Green Belt is recognised. However, a London plan which is rigid and does not allow for flexibility at the level of London Borough plan making, risks an increase in pressure elsewhere, especially the non- London Green Belt authorities. The latter are facing GB reviews in their own local plans to accommodate massive increases in development targets.

This could well result in the release of land with higher landscape or biodiversity value than some of the degraded sites the Mayor notes to be retained.

Rigid retention of all London MGB land is also likely to have the effect of displacing development pressure to districts beyond the MGB, where again land of significant environmental value recognised in Local Plan policy is already coming under pressure.

We would query whether this is the most sustainable option in environmental terms across London and WSE.

Retention of all London MGB and displacement of housing development pressure to WSE is also likely to increase the number of commuters facing longer journeys into London which is unsustainable in itself and places more pressure on already overburdened transport systems.

We consider that a less prescriptive approach enabling the London Borough's to review MGB where appropriate, would be more realistic and ease this pressure.

We would also question whether the Mayor's approach on this matter responds effectively to para.84 in the NPPF which states:

84. When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.

We should expect to see evidence from the Mayor's office on this matter.

User:	Ms R Farooq
Protecting the Green Belt requires stronger enforcement.	

User:	Harlow Council

London’s Green Belt (G2 and G3)

Harlow Council also acknowledges the desire to protect London’s Green Belt and Metropolitan Open Land in accordance with the NPPF. However, in light of high housing and employment targets a more open discussion around the Green Belt and greater flexibility to adopt tailored approaches where locations are of poor quality, have low environmental importance and are not accessible for leisure use should be discussed.

User: London Borough of Hounslow

LB Hounslow considers that the Green Belt policy is unsound by virtue of developing an inflexible approach that does not mirror the National Planning Policy Framework (NPPF), which sets out the principle that Local Planning Authorities should review their Green Belt boundaries through Local Plan review process to ensure it meets the purposes. Please see our overall response.

The London Plan policy on protection of Green Belt, as currently drafted, represents a significant challenge in delivering on the ‘good growth’ and spatial development patterns set out in the plan, by heavily constraining the ability of Boroughs to develop a sustainable approach to meeting growth in housing and employment envisaged by the plan, and in the areas expected. If these objectives are to be met, the policy should, reflect national policy, allow a level of flexibility, by recognising that Green Belt Reviews allow for land that is no longer fit for green belt purposes to be used efficiently to help boroughs achieve growth.

In particular, a flexible approach should be given within Opportunity Areas which contain green belt and align with major regional and national infrastructure such as Heathrow airport, to ensure the plan takes a long-term view of sustainable expansion and economic growth. It is useful to note that Heathrow airport expansion consultation proposes similar development in some of Hounslow Green Belt land that are not fit for purpose to enable Airport related development such as Hotels, Offices and Industry and Warehousing.

User: Maidstone Borough Council

The Council does not support the London Plan's apparent moratorium on the de-designation of Green Belt in Policy G2. The Plan's justification for this is that the Green Belt performs multiple beneficial functions for London including combating urban heating, growing food, providing recreational space and limiting further built expansion. Only the last of these – restricting urban sprawl - matches a purpose for the Green Belt as defined in the NPPF. The NPPF is also clear that it is for Local Plans to consider and justify alterations to Green Belt boundaries. London boroughs preparing their Local Plans would be expected to determine how housing needs should best be met, including through an objective Green Belt Review to identify any parcels of land which do not meet the 5 purposes of the Green Belt sufficiently and which could be developed sustainably. The Green Belt coincides with the outer London boroughs whose housing targets are substantially increased compared with the latest iteration of the London Plan.

Authorities elsewhere in the South East have had to critically consider Green Belt release in order to meet their own objectively assessed housing needs. The Council does not agree that this option should be closed to the outer London boroughs as a matter of principle, particularly when the scale of the housing challenge is so great.

User:	Alison Hatt

I totally support Policy G2 and G4; in fact these could be strengthened to include more references to planting more trees. G7 refers to their protection-too late for Tooting Bec Common where Wandsworth Council’s act of vandalism has destroyed venerable horse chestnut trees-but crucial for healthy environment.

User: Hampshire County Council

Green Belt

The direction of the draft Plan retains the policy decision to maintain, without question, the full extent of existing Green Belt designations within the Plan area. It is the view of the County Council that given the unplanned, unmet need of at least 1,000 homes per annum (dependent on extremely ambitious building rates), this position cannot be justified, and that the Plan should propose a considered review of the London Green Belt. This is an important point for many authorities in the Wider South East who themselves are being required to reconsider their own Green Belt designations in order to deliver their own housing need requirements. Hampshire County Council is a supporter of Green Belt policy, with green belt covering an area in the far south west of the county.

However, green belt designation is a tool to prevent the physical expansion of urban areas, and to prevent their coalescence. Given then that the majority of green belt designation in London was designated in the 1960's, many local areas have now been 'leap-frogged' by urban development in many of the London Boroughs, meaning there are substantial areas of green belt well within the London boundary. It is these areas that could potentially contribute to delivering the unmet need, and releasing pressure on other parts of the city where significant growth is being focused in order to deliver the very ambitious targets set out in the Plan. Therefore Hampshire County Council would recommend that the Plan commit to at least a partial review of the Green Belt, to identify those areas that no longer contribute to the original objectives of the green belt, but which could help to provide a specified delivery strategy for the entire housing need number.

User: London Borough of Redbridge

The draft London Plan supports the continued protection of the Green Belt from inappropriate development. It aims to accommodate all of London's growth within the capital's boundaries and without 'intruding on its Green Belt'. Policy G2 London's Green Belt supports the continued protection of the Green Belt from inappropriate development, although it supports the enhancement of green spaces to provide multi-functional uses where appropriate. It also does not support the de-designation of Green Belt.

As drafted, policy G2 does not refer to NPPF policy regarding development in the Green Belt. Instead the policy includes more simplified wording that seems to offer less scope than at present to consider individual proposals, or 'very special circumstances'. Until the NPPF is amended, the Council considers that the Mayor's absolutely no de-designation' stance is contrary to national policy.

Linked to the continued protection of the green belt is the impact of intensification on existing character of areas and the borough's established residential neighbourhoods. This is valued and important and further densification of the borough's town centres will continue to be a key concern for local communities, something which has been played out extensively during the Redbridge Local Plan hearings. Therefore we believe that not considering the green belt as a means of meeting some of London's unmet need potentially undermines the GLA's overall growth strategy.

As the GLA will be aware, the Council considered it had "exceptional circumstances" to release green belt to meet its housing need. This was demonstrated during the recent examination of the Local Plan.

To support this case, we carried out a series of Green Belt assessments which considered all the Green Belt in the borough against the 5 purposes identified in the NPPF. Various conclusions were made around altering the boundary of the green belt in the borough including a recommendation to release a number of sites because they no longer meet some or all of green belt purposes set out in the NPPF. This approach was endorsed by the Local Plan Inspector, which was made clear in his report, "…that just because a site contributes in some way to Green Belt purposes does not mean it cannot be released. There are other factors that need to be put into the equation". These other factors include closing the gap between need and supply and the need to find land for infrastructure.

Paragraph 83 of the NPPF provides that, once established, Green Belt boundaries should only be altered in exceptional circumstances through the preparation of the Local Plan. The Inspector considered whether these existed for Redbridge by looking at a number of factors including:

- The ability to meet the relevant housing requirement set out in the London Plan - As part of the evidence base, the Council carried out a substantial review of the indicative development capacity of the plan's opportunity sites. This took on board the latest planning application information, recent discussions with landowners and developers and the constraints affecting some sites, and application of the London Plan density matrix. This resulted in capacity for new housing from 'brownfield' sources over the plan period to be 15,937, approximately 900 units below the London Plan minimum housing target. Therefore it was quite clear that without Green Belt sites the London Plan minimum housing target would not be met. This would be contrary to the aims of the NPPF as well as result in non-general conformity with the London Plan.

On this issue the Inspector concluded that "the yield envisaged from within the built-up area is realistic and there is no suggestion that obvious candidates for development have been omitted. Furthermore, the estimates of capacity have sought to maximise densities as far as possible". He goes on to say that the work undertaken to establish housing capacity on brownfield sites was thorough and that further intensification could have a significant impact on transport junctions and links and the character and townscape of the borough.

In addition, the Inspector fully recognised that there are of other ways of increasing brownfield housing capacity, as set out in policy 3.3E of The London Plan. However, by means of the Employment Land Review the Council did assess the scope for the managed release of employment land, some of which are included as Opportunity Sites often as part of mixed use developments. Small sites have also been specifically allocated. An increase in densities in suburban areas is not supported by the London Plan and the matrix at Table 3.2. Furthermore, the option of higher density in the Western Corridor was considered as part of the SA process and discounted.

- The Council's poor recent record of housing delivery - In the five years from 2010-2015 the average number of completions was 359 per annum. Compared to the relevant housing requirements for those years there has been a shortfall of 2,149 units. Given that the housing need identified by the SHMA and the housing required by the Local Plan only equates to around 50% of the overall need, the gap between need and supply is a substantial one. Therefore without green belt allocations this position would be even worse.
- The need to meet the infrastructure needs of the borough - The Council's Infrastructure Delivery Plan identified the need for additional primary and secondary schools as well as new health facilities over the plan period. The strategic sites within the green belt offered the capacity to absorb some of this need. As such the Council allocated them for mixed use development including education and health/community uses. Concept masterplans show that this is feasible. The ability to provide accessible local services that reflect the

community's needs and support its health, social and cultural wellbeing is one of the dimensions of sustainable development. Therefore the Inspector accorded this matter to be of significant weight.

Given the above factors and the evidence put forward by the Council to support its strategy, the Inspector concluded that there are exceptional circumstances to warrant altering the Green Belt boundary in the borough to meet housing and infrastructure needs, specifically at Billet Road and the King George and Goodmayes Hospital sites. This is because of the limited contributions they make to Green Belt purposes, locational and site specific matters, the provision of new education and health facilities and the need for releases to meet the requirement for housing. These sites would promote sustainable patterns of development as referred to in paragraph 84 of the NPPF.

The Council clearly followed the approach set out in the NPPF and current London Plan in terms of assessing green belt. An approach fully endorsed by the Inspector.

As such, until the NPPF is changed, then draft policy G2 must replicate the essence of national policy in relation to green belt. If boroughs can demonstrate exceptional circumstances and have a robust green belt assessment in place which shows some parcels no longer meet the five purposes set out in the NPPF, then a sound approach has been taken. The Council concludes that the approach to Green Belt in policy G2 is, in effect, accepted as being at odds with national policy. We therefore suggest that "exceptional circumstances" is reinstated in policy.

User: Epsom & Ewell Borough Council

A review of the Metropolitan Green Belt and Open Land

The Borough Council notes that throughout the draft London Plan there is the presumption in favour of developing previously developed land and that the continued protection of Green Belt, Metropolitan Open Land (MOL) and other open land is advocated. Policy G2 B does not support de-designation of Green Belt in London although the supporting text at paragraph 8.2.1 highlights that the processes and considerations for defining Green Belt boundaries are set out in the NPPF.

The Borough Council supports the continued protection of the Green Belt. However along with its housing market area (HMA) partners, the Borough Council is under pressure to assess and review its Green Belt boundaries. The Borough Council has no choice but to undertake this approach in order to determine the extent to which its emerging local plan update can meet identified objectively assessed needs in a sustainable way (that is consistent with the policies of the NPPF, including the long term protection of the Green Belt).

Whilst the approach to developing on brownfield land first is supported, it is considered that beyond the first 10-year period (2018/19 – 2028/29), London will have reached a point where the Mayor will need to look at all options available. If the consequence of London boroughs not being able to undertake alterations to the Green Belt to allow for development is that they cannot meet their housing needs, then this could put pressure on surrounding districts in the WSE. The Borough Council highlights that many boroughs and districts in the WSE are also constrained and are struggling to meet housing needs, particularly where their housing market area overlaps with an adjoining London borough. The Borough Council does not want to be in a position where it has no alternative but release Green Belt land because a London borough in their housing market area is unable to release Green Belt land (to help meet the HMAs need). On that basis the Borough Council consider it important that London boroughs be able to undertake alterations to the Green Belt boundary in their own areas where there is evidence to demonstrate that there are exceptional circumstances, including meeting objectively assessed housing needs in full.

The Borough Council remains unconvinced that the proposed Kingston Opportunity Area (Policy SD1) and the links to increased development opportunities in the Chessington area (including up to 9,000 homes) as a result of Crossrail 2 South, can be achieved without potential releases of Green Belt land. The alternative would undoubtedly completely change the character of the area by extensive intensification of development on existing developed sites. This proposal clearly needs considerably more thought and attention than has been given to date. The Borough Council would welcome working with the GLA and the Royal Borough on developing an approach that could be sustainable for

the wider area.

User: London Borough of Havering

Havering notes the strong support in the draft London Plan for the Green Belt in **Policy G2 (Green Belt).** This accords with the approach in its own Local Plan. It will be unacceptable if an unintended consequence of a significant reliance on small sites in Outer London boroughs like Havering is to drive developers towards proposing development in the Green Belt because in practice small sites proved unable to meet the ambition of the London Plan.

...

Chapter 8 : Green infrastructure and natural environment

More than half of Havering is Green Belt and our communities value it highly. Havering supports the very strong commitment to protecting the Green Belt from inappropriate development and recognise that its de-designation will not be supported in **Policy G2 (Green Belt).** ?

As mentioned earlier, Havering is very concerned that the unrealistic and unachievable housing targets in the draft London Plan will result in increased pressure on the Green Belt as prospective developers identify difficulties with bringing forward satisfactory schemes in the built up areas.

User:	London Borough of Wandsworth

The Council welcomes the principle of the protection of green belt land but questions why the Mayor has not undertaken a review of the greenbelt to potentially accommodate part of London's housing capacity target. A review could tie in to the good growth principles and look at possible sites which have low environmental quality as possible development sites. See further comments made on policy GG2.

User: Mr Chris Parker

Kenley is located at the outer edge of the London area and includes a large area of Greenbelt land and Kenley acts as a welcoming green gateway between town and countryside. Any increased housing
intensity would inevitably have a detrimental impact not only on the overall village character of Kenley itself with the loss of trees but also on the flora and fauna and overall biodiversity of the Greenbelt areas.

Whilst the Plan claims to increase Green belt protection, all the measures announced already exist and the Plan does not therefore provide any additional Greenbelt protection.

User:	London Borough of Richmond Upon Thames

The Council welcomes the protection of green belt land. A thorough review of brownfield sites and unimplemented permissions should be the principal concern in addressing housing need rather than destroying the existing character and liveability of London, and particularly its suburbs, by for example developing on backgarden land or putting increased pressure on land and open spaces that have been designated as being of local importance. Focus should be on understanding why homes are not built despite having planning permission and the Council urges the GLA to work with Sir Oliver Letwin to review and explain the gap between the high number of planning permissions being granted in London against those built. This comment relates to the Council's overall comment that it makes about the lack of infrastructure to accommodate growth and considers both areas should be reviewed to fit with the Mayors approach to 'good growth'.

User: London Borough of Harrow

G2: London's Green Belt

The Council supports the protection of Green Belt Land where robust, up-to-date Green Belt studies identify land as continuing to serve Green Belt purposes (consistent with the NPPF). Policy G2(B) is however considered to be inconsistent with the NPPF, as the statement that 'de-designation of Green Belt Is not supported' makes no reference to the NPPF requirement that Local Plans need to be justified by evidence and Green Belt boundaries should be capable of enduring beyond the plan period. This inconsistency places boroughs with Green Belt in a difficult position as the NPPF indicates one thing (establish / confirm Green Belt boundaries through an appropriate evidence base) whereas the draft London Plan just places a blanket ban of Green Belt de-designation with no evidence or policy basis for this.

G2 (A)(1)

Draft Policy G2 London's Green Belt, paragraph (A) (1) is considered to contradict the NPPF as reference to 'very special circumstances' in the context of 'harm' is not included in the policy. This is considered contrary to NPPF paragraph 88, which indicates: 'When considering any planning application, local planning authorities ' should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations'. The draft policy essentially seeks to prevent Local Planning Authorities from weighing up whether very special circumstances exist for development that is inappropriate and therefore by definition, harmful (see NPPF paragraph 87: 'inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances'.

User: Crawley Borough Council

In particular, CBC suggests that the proposed balance between the meeting of housing need and the protection of existing designated and other environmental and/or community assets is partly at variance with the approach taken by other authorities, and with the commitment in **para. 2.3.1** that ‘as far as possible sufficient provision will be made to accommodate the projected growth within London.’

CBC is particularly mindful of draft **Policy G2**, which gives unqualified protection to the Green Belt. It is accepted that this partly reflects the strong protections granted to the Green Belt within the NPPF, but CBC notes that a number of Green-Belt-constrained authorities outside of the London boroughs, facing severe housing pressures, are reviewing their Green Belt boundaries in order to ensure that these continue to fulfil the purposes of the Green Belt designation, and to enable the release of land to achieve other key planning objectives where the contribution is poor or negligible.

On a more local level the housing allocations made in the CBLP, with a view to fulfilling the para. 47 requirement, include existing playing field land, land in the countryside and land in a site of nature conservation importance. This includes the delivery of two new neighbourhoods immediately adjacent to the existing built-up area boundary, one of which is located outside the CBC administrative boundaries and has been delivered through a Joint Area Action Plan with the adjoining authority area.

Against this backdrop, CBC considers that there would be legitimate scope for review of the current London Green Belt boundaries. In particular, it is believed that the London Plan, rather than the development plans of individual boroughs, would represent the best framework for a strategic approach to this issue.

User:	London Borough of Havering
Please refer to Annexe1 submitted with the Havering response letter.	

User:	Greenspace Information for Greater London CIC (GiGL)

GiGL response: high quality data identifying where green belt and metropolitan open land is should also be generated and centralised to enable informed decision-making.

User: London Young Labour

The Green Belt

Our members believe that protecting the environment and green spaces in London is extremely important and recognise the strong public opinion in favour of retaining the Green Belt. However, we feel that the public perception of the areas that make up the Green Belt is very different to the reality. Much of the land that makes up the Green Belt, which makes up over a fifth of the total land area of London, is taken up with uses such as golf course or simply neglected and derelict.

While we remain strongly against building on genuine green spaces such as Areas of Outstanding Natural Beauty, Areas of Conservation or Special Protection, nature reserves or woodland, and entirely agree on the need for more high density housing outside the Green Belt, we believe the urgent need for housing means that limited building on some smaller, less ‘green’ areas of the Greenbelt is unavoidable.

We therefore believe that City Hall should undertake a comprehensive, strategic review of the Greenbelt, taking into account factors like proximity of land to stations and the land’s long term use. Such an approach would not have to mean the Greenbelt shrinks; one idea from our members was that Greenbelt land built on could be replaced by adding more land to the Greenbelt elsewhere. For example, if a site involved building 100 hectares near an underground station it could be replace by 150 hectares to the Greenbelt further out of London.

User:	Jenny Fisher
Protecting the Green Belt requires stronger enforcement.	

User: Mr Joe Ward

We welcome Policy G2 and particularly the proposal in Policy G2B that ‘de-designation’ of Green Belt will not be supported. This policy needs to be reinforced for it to be effective.

Proposed change: A presumption against the alteration of Green Belt boundaries which reduce its extent should be included in policy G2B so that it reads: **‘The extension of the Green Belt will be supported and its de-designation will not. We will enforce a presumption against the loss of Green Belt’.**

Rationale: The release of Green Belt land is being proposed in numerous locations across London. There is a need for an increase in capacity to enable the GLA to follow up this commitment and to object effectively to any proposals for Green Belt release. Unless strongly resisted, the loss of Green Belt will seriously affect the ability of the Mayor to realise his ambitions for protecting and extending existing green space.

User:	(FOE) Friends of the Earth England Wales and Northern Ireland

We welcome the Plan's approach to protecting and enhancing London's Green Belt set out in Policy G2 and the recognition of its multiple benefits and functions.

We are concerned, however, that the policy may be insufficiently strong to prevent councils allowing GB to be built on and encroached upon, such as appears to be taking place in Hounslow. Any loss of Green Belt will make it very hard for the Mayor to realise his ambition of making London more than 50 per green by 2050. We therefore suggest additional text be added to the policy which states that **'proposals that lead to any loss of or reduce the extent of the Green Belt will be opposed'.**

User:	West Wickham Residents Association

We welcome the protection of the Green Belt, Metropolitan Open Land and other green spaces such as allotments.

User:	London First

Green Belt and Metropolitan Open Land – the Plan’s approach to Green Belt is not consistent with the National Planning Policy Framework and is restrictive for boroughs that may wish to review Green Belt boundaries through the development plan process. This reduces potential sources of land supply available to boroughs to achieve their housing and economic development targets. These policies should be amended to be in line with national policy.

User:	London Borough of Enfield

Policy G2 ‘London’s Green Belt’ needs to set out a vision/aspiration for its use or purpose. The Green Belt provides many opportunities to benefit Londoners; it can be used as a resource for local food production. The policy needs to recognise that it may be inappropriate to increase access to some parts of the Green Belt. There also needs to be some clarity on ‘Openness and permanence’ as a characteristic of the green belt. For example, does this mean that woodland creation will be discouraged?

User: London First

Green Belt and Metropolitan Open Land
It is unrealistic to think that current land supply is sufficient to meet the capital's housing target; the London Plan should not, therefore, rule out reviewing London's Green Belt. The Mayor should work with the boroughs to review their Green Belt and to consider how the land within it that is close to existing or future transport nodes and that is of poor environmental or civic value could better serve London's needs by supporting sustainable, high-quality, well-designed residential development that incorporates truly accessible green space.

Where boroughs wish to review their Green Belt boundaries and may wish to de-designate Green Belt and designate it for an alternative use, they should be allowed to do so. They will be subject to the statutory requirements to provide a robust evidence base and justify any changes to Green Belt policy through the local plan examination process. Borough-led Green Belt reviews may enable industrial land in highly accessible locations to be relocated to locations with good connections to the arterial road network. This may release industrial capacity in locations served by existing or planned transport, such as CR2 or the Bakerloo Line Extension for high- density housing and mixed-use development.

At the very least, **draft policy G2** should be amended so that it is consistent with the National Planning Policy Framework.
The draft policy currently reads:

A The Green Belt should be protected from inappropriate development:
1) development proposals that would harm the Green Belt should be refused
2) the enhancement of the Green Belt to provide appropriate multifunctional uses for Londoners should be supported.
B The extension of the Green Belt will be supported, where appropriate. Its de-designation will not.

It should be amended to read:
A The Green Belt should be protected from inappropriate development:
1) development proposals that would harm the Green Belt should be refused ***other than in very special circumstances****.*
2) the enhancement of the Green Belt to provide appropriate multifunctional uses for Londoners should be supported ***where it does not conflict with the purposes of the Green Belt (or where there are very special circumstances for doing so)****.*
*B The extension of the Green Belt will be supported****, where appropriate as part of an evidence-based review****. Its de-designation will not* ***, other than in exceptional circumstances****.*

User: Enfield RoadWatch

Green Belt

We welcome **Policy G2** and particularly the proposal in **Policy G2B** that ‘de-designation’ of Green Belt will not be supported. However, this policy needs to be enforced for it to be effective. The release of Green Belt land is being proposed in numerous locations across London and we are concerned that release will be proposed in Enfield’s revised Local Plan. The GLA needs to be able to follow up on this commitment and to object effectively to any proposals for Green Belt release.

We suggest the following change to the wording of **G2B:**

The extension of the Green Belt will be supported and its de-designation will not. We will enforce a presumption against the loss of Green Belt.

User: Berkeley Group

9.3. The Mayor should not seek to prevent boroughs from considering opportunities to release poor quality green belt to deliver new homes, amenities and high quality public space that can be enjoyed by the local community. Indeed, the Mayor should be encouraging the boroughs to do so. Boroughs should be able to review green belt appropriately though the local plan as considered in the NPPF. Policies G2 and G3 should be amended to better reflect the NPPF (paragraphs 82 and 87):

Policy G2 London's Green Belt
A The Green Belt should be protected from inappropriate development:
1) development proposals that would harm the Green Belt should be refused except in very special circumstances.
2) the enhancement of the Green Belt to provide appropriate multifunctional
uses for Londoners should be supported.
B The extension of the Green Belt will be supported, ~~where appropriate~~ in exceptional circumstances. Its de-designation will not be supported other than in very exceptional circumstances.

User:	Rebecca Rose

I believe that everyone in London has the right to breathe clean air, have access to nature and to benefit from clean energy. I am therefore pleased to see policies in the new London Plan which seek to address these important environmental issues. These include policies to protect our Greenbelt and Metropolitan Open Land, a ban on fracking, and a commitment to London becoming zero carbon.

User: HTA Design LLP

We fully support the Mayor’s notion that large amounts of Green Belt do not need to be released to facilitate London’ growth and housing need. However, there are left over portions of green belt land within London that have become surrounded with transport infrastructure and other uses, that offer little biodiversity value and no access to green spaces for people, and it is important that these portions of land do not get protected at all cost. It is of utmost importance to very carefully approach what type of interventions would support health outcomes for London’s residents: as London’s existing fabric increases in density, we need to ensure accessibility for everyone to healthy, good quality green spaces. It is of utmost importance that. In instances where green space is protected, it provides a function to the public in terms of leisure, relaxation and activity. We cannot afford to protect ‘green belt’ that is not accessible to the public, in private ownership, and not fulfilling a function of providing some type of breathing space for Londoners.

User:	Mr Peter Davies

I am pleased that the draft recognises the importance of green spaces but policies need to be stronger to give them adequate protection, in particular: Protecting the Green Belt requires stronger enforcement.

User:	London Borough of Bexley

Whilst residential gardens barely get a mention in the draft Plan, London’s Green Belt, is given the highest importance, even though its value as green infrastructure may be the lowest of all the types addressed in **Chapter 8**. The Green Belt, as noted in **Paragraph 8.2.1**, makes up 22% of London’s land area (roughly the same as residential gardens), and **Policy G2** makes it clear that de-designation of any of this land will not be supported. However, the NPPF sets the requirement for local planning authorities to review Green Belt boundaries along with the criteria on how this should be carried out. Therefore, the Council will be carrying out a review of Green Belt in Bexley as part of the preparation of the new Local Plan, and adjust boundaries if appropriate. It is important to note that Green Belt does not mean greenfield; certainly, development and brownfield land exists in the Green Belt.

User:	SEGRO
To address the widening gap between demand and supply, we recommend that new industrial capacity is planned for and delivered through: ? New Opportunity Area Planning Frameworks (OAPFs) ? A review of the Green Belt	

User: Waverley

It is noted that you strongly support the continued protection of London's Green Belt and that draft Policy G2 does not support de-designation of Green Belt in London. Waverley supports the continued protection of the Green Belt in principle. However, most Surrey boroughs and districts are or have had to assess and review Green Belt boundaries as part of work to examine the extent to which emerging local plans can meet identified objectively assessed needs in a sustainable way that is consistent with the policies of the NPPF, including the long term protection of the Green Belt. In Waverley's case this has resulted in some localised Green Belt releases to help to meet housing needs.

If the consequence of London boroughs not being able to undertake alterations to the Green Belt to allow for development is that they cannot meet their housing needs, then this could put pressure on surrounding districts in the WSE that are also constrained and also struggling to meet housing needs. Moreover, there could be added pressure to accommodate growth further afield in districts that include areas beyond the Green Belt, in less sustainable locations to accommodate London's needs. Waverley Borough Council therefore considers that London boroughs should be able to undertake alterations to the Green Belt boundary in their own areas where there is evidence to demonstrate that there are exceptional circumstances, including meeting housing needs.

User: Revo

Revo supports a brownfield first approach, however in light of London's continued growth, a strategic review of Green Belt policy should be considered and we would support an independent review to explore making better use of the Green Belt, or explore innovative measures such as land swap (given that some Green Belt isn't entirely of high environmental quality). There should also be further conversation and possible incentives around the redevelopment of brownfield sites by Local Authorities to aid in preparation of sites or similarly to make them economically viable for private sector development.

Similar principles of national Green Belt policy apply to Metropolitan Open Land (MOL) which could also be subjected to a review of its role and how it could potentially contribute to helping meet London's acute needs. However, Policy G2 as is currently drafted does not seem in conformity with National Policy, particularly with regard to the NPPF's 'very special circumstances' (for inappropriate development, Part A(1)) and 'exceptional circumstance' (for boundaries amendments, Part B) which are not considered/mentioned in the policy text; the accompanying text at 8.2.1 creates further confusion as it refers to the NPPF para 79-92 as these provide 'a clear direction for the management of development within the Green Belt and sets out the processes and considerations for defining Green Belt boundaries'; we suggest revision of the policy text to provide clarity on this point.

User: SEGRO

Green Belt and Metropolitan Open Land
The above delivery mechanisms [set out in comments on Policy E4] can help to assist the current shortfall in [industrial] capacity, however they are unlikely to make a fundamental difference in the way London's industrial needs are met. We recommend that the Mayor undertakes a Green Belt review to determine if any land within the Green Belt does not perform particularly well against the five purposes of Green Belt as set out in the National Planning Policy Framework (NPPF), and is not subject to other significant constraints which could make the land inappropriate and unsustainable for development.

Low value Green Belt ('Brown Belt') land in the right locations could provide a sustainable means of meeting London's industrial capacity needs if developed for industrial/logistics space. New industrial development in accessible locations within the Green Belt would still need to be complemented by a network of smaller, last mile facilities with London's urban areas, but could make a significantly positive impact upon the Capital's industrial capacity. If enough industrial space is delivered in the right locations along strategic road networks etc., then it may be possible to release some land for other uses which is less well located in terms of serving core supply chains for key markets.

Where London Boroughs wish to review their green belt boundaries and may wish to de-designate green belt and designate it for an alternative use, they should be allowed to do so. They will be subject to the statutory requirements to provide a robust evidence base and justify any changes to Green Belt policy through the local plan examination process. Borough led green belt reviews may enable industrial land to be delivered that is close to the arterial road network and close to highly accessible conurbations.

We recommend that **Policy G2** be amended to be consistent with the NPPF:
A The Green Belt should be protected from inappropriate development:
1) development proposals that would harm the Green Belt should be refused unless very special circumstances can be demonstrated
2) the enhancement of the Green Belt to provide appropriate multifunctional uses for Londoners should be supported
B The extension of the Green Belt will be supported, where appropriate. Its de-designation ***[DELETE: will not]*** may be supported in exceptional circumstances following an evidence based review.

SEGRO recommends that The London Plan takes the same approach to Green Belt as the NPPF. If Borough's cannot accommodate their development needs outside of the Green Belt, then they should be able to undertake a review of the Green Belt to understand the quality and function of it, and to identify locations within the Green Belt where exceptional circumstances might exist to release land from the Green Belt,

and subsequently make it available for sustainable industrial development.

User:	M & A Seary
Is the plan to remove the green belt and create a residential ghetto on the career path to individual's political power?	

User: SEGRO

Appendix – SEGRO Proposed Policy Amendments to the Draft London Plan

Policy G2 London's Green Belt

A The Green Belt should be protected from inappropriate development:

1. development proposals that would harm the Green Belt should be refused **unless very special circumstances can be demonstrated**
2. the enhancement of the Green Belt to provide appropriate multifunctional uses for Londoners should be supported

B The extension of the Green Belt will be supported, where appropriate. Its de-designation ***[DELETE: will not]*** **may be supported in exceptional circumstances following an evidence based review**.

User: CPRE London

Green Belt

We welcome Policy G2 and particularly the proposal in Policy G2B that ‘de-designation’ of Green Belt will not be supported. This policy needs to be reinforced for it to be effective.

Proposed change: A presumption against the alteration of Green Belt boundaries which reduce its extent should be included in policy G2B so that it reads: **‘The extension of the Green Belt will be supported and its de-designation will not. We will enforce a presumption against the loss of Green Belt’.**

Rationale: The release of Green Belt land is being proposed in numerous locations across London. There is a need for an increase in capacity to enable the GLA to follow up this commitment and to object effectively to any proposals for Green Belt release. Unless strongly resisted, the loss of Green Belt will seriously affect the ability of the Mayor to realise his ambitions for protecting and extending existing green space.

User:	U+I
Aligned to this view, we believe that the London Plan should seriously examine the housing opportunities in the Green Belt and Metropolitan Open Land – defining those areas which truly deliver the spirit and ambitions of the Green Belt and those which might be ripe for development – particularly in sustainable locations near transport nodes. We are keen to explore further whether this can be done without a net loss of land in the Green Belt if more suitable pieces of land are swapped in.	

User:	U+I

While priority should continue to be given to using urban and brownfield land, as suggested in the proposed changes to the NPPF, the range of available options required to meet existing housing need must go beyond this.

Initiatives such as new settlements close to public transport infrastructure will need to be part of the solution, even if they fall within Green Belt land or MOL. Schemes can then consider either appropriate mitigation measures or replacement Green Belt.

User: Zbig Blonski

Policy G2 – London’s Green Belt

56.Part B of the policy says (with incorrect spelling) that de-designation of the Green Belt will not be supported. This is in conflict with the NPPF.

57.Paragraphs 83 and 84 allow for this stating:

58.“Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

59.When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.”

60.London Plan policy should therefore be amended to align with the approach in the NPPF.

User: British Property Federation

The BPF has a long tradition of supporting brownfield-first policies. However, the Federation now recognises the need to take a strategic view on Green Belt policy, by making better use of transport corridors that pass through it.

In our view, the LP should encourage an independent (and apolitical, as much as possible) review of the role that the London Green Belt currently has (e.g. with regard to preserving openness and preventing sprawl), and the role it could potentially play in contributing to meet London's housing needs in appropriate locations. The starting point for any future Green Belt review should consider areas that relate closely to existing or future transport nodes that are of poor environmental quality.

At the very least we would argue that this policy should be amended so that it is consistent with the National Planning Policy Framework.

User:	Dulwich Park Friends
Protecting the Green Belt requires stronger enforcement.	

User:	Apex Airspace Development

The Mayor strongly supports the ***continued protection of London's Green Belt,*** *This has helped to drive the re-use and intensification of London's previously development of brownfield land to ensure London makes efficient use of its land and Infrastructure, and that inner urban areas benefit from regeneration and investment.*

We fully support the London Mayors continued policy in protecting the Green Belt. We believe that London has the potential to support housing delivery through innovation and intensification. Not through developing Green Belt land that provides many benefits to Londoners rural communities. Further to this it encourages intensification and efficient use of land

User: Claire Mellish

8 Green Infrastructure and Natural Environment (G policies) 301 / 319

I welcome Policy G2 and particularly the proposal in Policy G2B that ‘de-designation’ of Green Belt will not be supported. This policy needs to be reinforced for it to be effective. Proposed change: A presumption against the alteration of Green Belt boundaries which reduce its extent should be included in policy G2B so that it reads: ‘The extension of the Green Belt will be supported and its de-designation will not. We will enforce a presumption against the loss of Green Belt’.

User: Urbanissta

Identified Need

The replacement London Plan sets a housing requirement for 65,000 dwellings per annum up to 2029 which is supported as it is higher than the current London Plan figure of 40,000 and shows that the need to address housing shortages is being taken seriously. This figure however is still lower than the full objectively assessed need of 72,000 dwellings per annum (capped) and 100,000 (uncapped) that is identified within the Governments standard method of OAN as identified within the Right Homes in the Right Places document.

The Plan should identify that the full OAN is 100,000 dpa to identify the significant housing need within the City as the figure of 65,000 dpa masks the true extent of housing requirement within the City, as well as aligning with the approach to housing within England.

Paragraphs 0.0.21 and 0.0.22 suggest that upon adoption of the draft London Plan, the draft housing targets listed in table 4.1 will automatically update the existing housing targets of the London LPAs. They will not need, by implication, to produce supporting Part 1 Local Plans. The testing of the ability of the London LPAs to accommodate the London Plan targets should be subject to a more detailed assessment of locally assessed OAN and land supply.

The Plan sees the housing requirement increased by approximately 22,000 dwellings since the FALP document of 2016, with the highest increases in suburban authorities such as Barking & Dagenham, Brent, Croydon, Enfield Ealing, and Hounslow along with Newham, and that all these units will be met within the London boundaries.

Several the Boroughs identified above have Green Belt constraints and it is considered unreasonable for a Local Authority to have a significantly greater housing requirement without being allowed to consider all options for delivery of these units, including options for releasing suitable Green Belt sites. High density development cannot be considered suitable for all sites and as such alternative options for meeting the increased housing requirement should be assessed by each Authority. These are matters that can be assessed through Local Plans.

User: Town and Country Planning Association

Policy G2 London's Green Belt

3.7.7 The TCPA supports the protection of London's Green Belt and the emphasis on 'enhancing' it where possible, particularly in terms of increasing public access and local food growing. The TCPA welcomes the recognition that even though some areas of Green Belt have been allowed to become unattractive they can still provide useful benefits to London, such as combatting the urban heat island effect.

User: Uttlesford District Council

It is made clear in the draft London Plan (Policy G2) that release of the Green Belt will not be supported, but that extensions to it will. Uttlesford District Council is suggesting that as part of the draft London Plan, a review of the Green Belt is undertaken, especially focussing on those parts of the Green Belt that have good access and proximity to London, such that the GLA and its partners can better understand the real potential for housing delivery in London. This is particularly pertinent given the identification of the Growth Corridors on Figure 2.1 (The Key Diagram) and Policy SD1, which extend into and through the Green Belt. Linked to this is supporting text to Policy SD3 (Growth Locations in the Wider South East and Beyond) which acknowledges that although the draft London Plan seeks to accommodate projected growth, the impact of ongoing patterns of migration, barriers to housing delivery and potential future changes in projections means it is prudent to explore the potential for accommodating more growth in sustainable locations outside the capital. Given current linkages between Uttlesford and London, by rail and the strategic highway network, it is essential that Uttlesford District Council has the opportunity to work with the GLA on cross-boundary, regional planning matters including in particular matters relating to the London Stansted Cambridge growth corridor.

Like the London Mayor, Uttlesford District Council acknowledges the impact of population movement to and from London, as well as commuting patterns, and continues to investigate this through its SHMA / OAN. However, Uttlesford, like other boroughs and districts in the 'Wider South East' region outside of London, also has constraints which impact on the delivery of new housing and economic development. In Uttlesford, these also include a small area of Green Belt to the south of the district.

Uttlesford District Council is currently in the process of reviewing its Local Plan. The District is experiencing major growth pressures and will see unprecedented growth in the next plan period and beyond: the Council is proactively planning for the delivery of three new Garden Communities and acknowledges continued growth at Stansted Airport. This scale of growth is set in the context of major growth in neighbouring districts, in north and mid-Essex, Hertfordshire and Cambridgeshire. Such growth is dependent upon investment in new infrastructure. The District, and its partners, including Essex County, is facing major challenges delivering existing planned growth. Any additional growth resulting from draft London Plan policy decisions would place irreconcilable pressures on local infrastructure and quality of life, which would run counter to the approach to 'Good Growth' set out in the draft London Plan.

It is thus crucial that the Mayor of London is able to demonstrate that the challenging growth targets in the London Plan are realistic and deliverable, and that all viable alternatives to accommodating growth are fully explored. Uttlesford District Council therefore recommends that a strategic review of the London Green Belt is undertaken, in association with the Green Belt boroughs and districts (both within London and

those that have good access and proximity outside London) to fully consider what opportunities exist for additional, sustainable growth locations in London before exploring opportunities further afield.

User: Kenley & District Residents' Association

3 Kenley needs to be treated as a buffer zone

Kenley is located at the outer edge of the London conurbation and includes a large area of Greenbelt land. This extreme southern part of Croydon needs to be a buffer zone between the urbanised areas such as Purley, and the open green belt. Otherwise, the London Plan and Croydon Plan will progress toward creating city centre type housing right up to the boundary with the green belt: this would inevitably have a deleterious effect on the flora and fauna in the Belt.

4 Kenley is a gateway to the green belt

Following on from the above. Kenley station is an ideal access point for those travelling from the city area to the green belt. If Kenley is comprehensively urbanised, as currently intended by the London Plan, then people arriving at Kenley will be confronted by more city centre type buildings and a dangerous walk to access the green belt.

Kenley should present a nice quiet residential gateway that is welcoming and safe for city dwellers that wish to access the greenbelt.

User: S Place

The protection of all Green Belt land is essential. Elements of the proposals in this draft plan weaken the policies of the previous plan. Excessive increase in the housing total for LB Hillingdon will weaken the po1icy and will encourage developers to encroach onto Green Belt land. This policy as set out in the previous London Plan should not be changed. It is not clear what is meant by the terms' enhancement' and ·appropriate multifunctional uses' grey, muddled terminology like this leads to many problems later on.

The suggested proposal to ·enhance' open spaces e.g. Metropolitan Land is again very weak . There must be strong policies to protect the conservation areas of Metropolitan Land and other parks from inappropriate developments in the buffer zone around these areas.

The draft plan does not appear to recognise or give any support to protecting green chains. These are vital corridor links between open spaces to allow the migration of wildlife. This omission should be addressed.

Many areas of the built environment are already lacking in nearby open space. The proposals within this draft are set to take away a lot of open space used by the majority of the inhabitants, namely gardens. As the London Boroughs are going to be expected to treble their annual rate of dwelling production, where are they supposed to find extra land to produce green open space? This is not at all clear.

User: London Wildlife Trust

We welcome and support Policy G2, and the intention of the Mayor to find means to improve the multi-functional quality of the Green Belt and people's access to it. However, we recognise that this is likely to place increased pressure on brownfield sites towards the centre of the city. The Mayor should provide guidance on when a brownfield site is of high environmental value and ensure that all brownfield sites being considered for development are supported by an up to date ecological survey and assessment, and if appropriate set out mitigation to address loss of or damage to biodiversity.

We also recommend that there needs to be an explicit link here to the NPPF requirement to map ecological networks (NPPF para 117), for which the Green Belt both within and outside Greater London is a critical component in terms of existing and potential ecological value.

User: Surrey County Council

The Plan's approach of developing on brownfield land first is supported and the 10 year housing targets for 2019/20 – 2028/29 (Policy H1) have been set on the basis that they can be achieved without intruding on its Green Belt. Policy G2 does not support de-designation of Green Belt in London although the supporting text at paragraph 8.2.1 highlights that the processes and considerations for defining Green Belt boundaries are set out in the NPPF.

We support continued protection of the Green Belt, however most Surrey boroughs and districts are having to assess and review Green Belt boundaries as part of work to examine the extent to which emerging local plans can meet identified objectively assessed needs in a sustainable way that is consistent with the policies of the National Planning Policy Framework, including the long term protection of the Green Belt. We therefore consider it important that London boroughs should be able to undertake alterations to the Green Belt boundary in their own areas where there is evidence to demonstrate that there are exceptional circumstances, including meeting housing needs.

This is especially relevant, because under national policy local plans would normally be expected to set policies for a 15 year period that extends beyond the Plan's 10 year housing targets. It is noted that in the current London Plan, there is a commitment to revising the targets for 2015-2025 by 2019/20 and advice to the boroughs that they should roll forward these targets for any intervening period. There should be a similar commitment in this Plan to review the targets and advice to roll forward the annual targets for 2019/20 – 2028/29 for any intervening period in order to provide guidance for local plans.

User: Crest Nicholson PLC

We consider this Policy to be unsound as currently drafted and amendments are required.

It is clear in the Draft London Plan the extent of the Housing Crisis the city faces. With 65,000 new homes planned each year for the next ten year period up to 2029 (as set out in Policy H1) the challenge of ensuring that supply keeps pace with demand is evident. Whilst Crest Nicholson would not disagree that, where possible and viable, redevelopment of brownfield land should be encouraged this should not be seen as a panacea to the housing crisis. It is logical and demonstrates sustainable planning and living to promote development with good transport links. Yet the Draft London Plan's approach in Policy G2 to development in the Green Belt is not consistent with national policy (NPPF) nor with its own policies that support brownfield development (even when that is located within the Green Belt) and sustainable development around transport hubs and with good transport links. The NPPF (paragraph 87) allows for inappropriate development to be approved in "very special circumstances" something that the Draft London Plan does not recognise nor allow for. As a minimum Policy G2 should be amended to read as set out later in this representation.

Should Policy G2 not recognise circumstances whereby in order to enhance the Green Belt and to provide use and access to the land then some development could be allowed? For example, Green Belt land that is in private ownership may provide no general recreational access or enjoyment to Londoners. This same Green Belt land may also offer little or no biodiversity contribution or flood prevention and the only reason stopping the land being brought forward for development is its designation. It may also be the case that Green Belt land contains pollutants or hazards which not only detracts visually on the wider landscape but also create a health and safety risk.

In many areas of land Green Belt designations either serve no or limited purposes any longer and so it would be appropriate for London Boroughs to be encouraged to undertake Green Belt reviews. As a result those areas of Green Belt that no longer serve any or only limited Green Belt purposes, as required by the NPPF, will be identified and London Boroughs can determine if they consider that exceptional circumstances exist, such as a lack of housing supply, that might warrant release of the under-performing Green Belt. Likewise this will enable the London Boroughs to robustly defend the remaining designations and consider if new Green Belt should be designated. The Mayor should be proactive and encourage a London wide Green Belt review which would truly enable the Mayor and the Boroughs to establish whether areas of Green Belt should remain designated as such or instead should be released; further it would enable the Mayor and Boroughs to determine if new Green Belt should be designated; and lastly crucially it will enable the Mayor to understand the capacity of London to genuinely cater for its own housing need or whether additional supply will be needed from neighbouring authorities surrounding London.

Policy G3 Part C recognises that Metropolitan Open Land boundaries can be altered via the Local Plan process, which is consistent with the NPPF and we would advocate permitting Green Belt boundaries to be altered via Local Plan reviews and following completion of Green Belt reviews, so Policies G2 and G3 are consistent with one another. This does not guarantee boundaries will be amended only that there is scope to amend allowing flexibility of approach during the currency of the Draft London Plan. Policy G2 Part B should be deleted as a minimum as it is inconsistent with the NPPF paragraphs 83, 84 and 85 and instead should be replaced with wording consistent with Policy G3 Part C.

Explanatory text paragraph 8.2.1 makes reference to “beneficial functions” of the London Green Belt, yet in national policy terms and evolve case law none of the examples listed in the paragraph are valid reasons to justify designation or retention of Green Belt. Likewise whilst paragraph 8.2.2 suggests the Mayor will seek to improve quality and enhance access to derelict Green Belt sites the Mayor will no doubt be aware that where such sites are in private ownership there is very little that can be done to force access and improvements referenced in this explanatory text. As proposed below there are proactive and reasonable steps that could be taken to achieve the Mayor’s aims but maintaining the Green Belt as completely sacrosanct in all circumstances will not achieve this.

It could be the case that even allowing limited development on the Green Belt would enable, as part of development proposals, land to be identified as open space and be brought into public ownership with opportunity for the wider population to access and enjoy important green areas. Sites that would previously have been private, Green Belt land that may have been under- performing in Green Belt terms and providing little ecological or recreational benefit instead could accommodate the creation of unique and rich ecological environments including new habitat as well as the provision of recreational uses. For example sites could accommodate community orchards; with management in place the right vegetation could be planted to improve air quality and valuable habitat protected; wild flower meadows could be planted which would encourage the insects and butterflies back into our city.

It could be the case that if a Green Belt site was to be brought forward for development a significant proportion of it (which could be set out in policy or be at the discretion of the London borough allowing viability to be taken into account) could be required to make a positive environmental improvement which more than mitigates the impact of the development. For example if a 10 acre site was to be proposed for development no more than 4-6 acres (40-60%) could be built on. The balance of the site must be opened to the public with a stringent ecological improvement test which creates a sustainable and improved biodiversity. The land being brought forward for development must contain 50% affordable housing and these houses must meet the necessary green credentials and energy efficiency.

In contemplation of what is set out above it is our representation that Policy G2 of the London Plan could be amended as follows:-

A The Green belt should be protect from inappropriate development save where very special circumstances exist that warrant approval of development proposals otherwise

:
1) development proposals that would harm the Green Belt should be refused
2) limited development proposals that are sustainably located, would improve the biodiversity of the land proposed for development and would offer public access to parts of the land proposed for development which would not otherwise be enjoyed by the public, will be considered as providing very special circumstances to warrant approval of such development proposals subject to meeting affordable housing thresholds and conforming with other relevant policies in this Plan
3) the enhancement of the Green Belt to provide appropriate multi-functional uses for Londoners should be supported."

The London Plan needs to recognise that it is not just the amount of green space that is important but it is the quality. The London plan states that it is the Mayor's long-term target to make "more than 50 per cent of London green by 2050" however there is little for Londoners to gain if that 50 per cent is 'fenced off' to be enjoyed by the few and not the many.

The amendments proposed above in relation of Policy G2 of the Draft London Plan would also be relevant in contemplation of Policy G4(B). In areas of a deficiency in public open space, limited development on the Green Belt could be used as a catalyst to facilitate community access and use. These areas of Green Belt development could be identified in consultation with the Local Boroughs.

In conclusion, as the population of London grows land will become an increasingly scarce resource and the efficient use of this land will become ever more important. Whilst protection of the Green Belt may appear commendable policy, if this policy fetters the ability to bring forward sensitively designed, environmentally friendly and desperately needed housing is it doing more harm than good. If this policy is preventing the improvement of biodiversity, preventing the enjoyment and access of our open spaces we will be in danger of becoming the victim of good intention. Development offers an opportunity to make changes, planning offers the opportunity to regenerate and create beautiful places and environments. There is no reason why human habitats should not be integrated into the natural environment creating desirable places for all species to enjoy; this is the fundamental challenge the planning system now faces and how we respond to this challenge will define our future. Blanket policy that restricts development on the Green Belt where there could be an opportunity to use development as a mechanism to facilitate environmental improvement should be avoided. The emphasis should be on the quality not quantity of our green space and if development is a means of facilitating improvement of biodiversity or community access surely this should be embraced.

We also concur with, but do not set out in detail here, the representations made by the HBF in relation to Policy G2.

User:	Catalyst Housing Limited

GREEN BELT

Draft Policy G2 goes further than national policy set out in the NPPF, particularly A (1) and B. As drafted, it is currently unsound and should therefore be amended to be consistent with national policy.

User: Reigate and Banstead Borough Council

The council recognises the importance of the metropolitan green belt and metropolitan open land in London. the Mayor has ruled out any consideration of a review of green belt within London. It is unclear if this is intended to be binding upon the Local Plans produced by the London Boroughs. NPPF draft revisions set a high bar and additional justifications needed before Green Belt land is released. These include demonstrating that best use is made of brownfield land and other land within the urban envelope including promoting good design to create new living environments which will meet the needs of future generations. These are supported by the council. At a local level, and entirely consistent with Green Belt purposes, there are circumstances where revisions to the Green Belt are justified and the Borough Council considers that the same standards and criteria should be applied to the Metropolitan Green Belt irrespective of whether this is one side of the London administrative boundary or the other side.

Outside of London, consistent with the NPPF, councils are required to consider and justify the green belt boundaries in appropriate circumstances which may include meeting objectively assessed needs. The precedent has been set in many Local Plans in many parts of the Metropolitan Green Belt, for example the Reigate and Banstead Core Strategy 2014. An objective evidence based approach is also appropriate within London and the case for not doing so seems to be based on a political rather than an objective judgement. This requires attention and the Council is happy to assist the adjacent London Boroughs with an appropriate collaborative joint review.

The Council welcomes the recognition of the interrelationships between London and the wider south east and especially that the London/Gatwick/Brighton corridor and the North Downs line orbital route are key investment priorities. There are also important physic The Reigate and Banstead Core Strategy and draft Development Management Plan include some ambitious growth proposals along the London/Gatwick/Brighton corridor. The council welcomes the commitment for future constructive joint working to ensure that our respective growth proposals are complementary and that the appropriate infrastructure investment needed to meet the needs of our own and London residents in these corridors is secured.

The original purposes of the Green Belt remain relevant and the council is keen to see these reflected in its own Local Plan and the statutory plans of adjacent council’s including in the London Plan: in particular to continue to check the unrestricted sprawl of large built-up areas and to prevent neighbouring towns merging into one another. The identity and characteristics of individual settlements should be maintained at the same time as the promotion of Good Growth in London and to take equal effect in the areas beyond London such as Reigate and Banstead Borough.

There is concern that the promotion of London/Gatwick/Brighton growth corridor will be realised as a stretch of continuous urban development from Greater London to the South Coast. The council is determined to maintain strategic open gaps between adjacent towns and to commend this approach to other. The maintenance of the Metropolitan Green Belt is an important part of this wider spatial strategy shared between London and the wider south east. There are severe pressures for unregulated development and in this respect it is noted that the Mayor is expressing support for the expansion of Gatwick. The council is less convinced that there are such overwhelming advantages and certainly not without proper planning, infrastructure provision and environmental protection including the maintenance of

Green Gaps.

These should be achieved in collaboration and in this regard the council welcomes the switch in emphasis in the NLP towards “willing partners”. Specifically the commitment to additional infrastructure investment in strategic infrastructure investment locations should not be regarded by the Mayor as an automatic trigger for growth opportunity areas in the wider south east, including imposing requirements to meet London’s unmet housing need: unless this has been discussed and agreed with the respective councils at district and county level.

The wider south east and particularly adjacent areas such as Reigate and Banstead are popular with Londoners seeking areas for recreation and leisure and the enjoyment of the countryside and this should continue to be accessible to people irrespective of home location.

Recognition of the spatial role of London in terms of physical development in the wider south east is welcomed. This should include recognition of interrelationships with the wider south east in terms of Green Infrastructure and Natural Environment as set out in chapter 8. This to be identified and highlighted as well as the Strategic Infrastructure Priority (Figure 2.15 (9)) which refers to the London-Gatwick-Brighton corridor al and environmental relationships in this corridor. We consider these to be priorities.

User: Fairview New Homes

Green Belt
Fairview support the HBF in their comments on Green Belt. The London Plan is not a Local Plan as the Mayor is anxious to remind us. National Planning Policy allows local planning authorities when preparing their Local Plans to establish Green Belt boundaries. Green Belt boundaries, once established, can only be altered in exceptional circumstances, through the preparation or review of the Local Plan. It is clear from the NPPF that the extent of the Green Belt is a matter for local planning authorities to decide through the preparation of their Local Plans. This is not a matter over which the Mayor of London has complete jurisdiction, although he may produce a spatial strategy that outlines the general principles of growth and where that growth might best be accommodated. Ultimately, it is a matter for the individual local planning authorities to determine the most appropriate way to meet the housing targets that have been identified by the Mayor.

As an illustration the Mayor's housing target has historically relied on release of employment land and some mixed use development, coupled with a periodical review of Green Belt by the respective London Boroughs who have Green Belt. The proposed housing allocations which disproportionally allocates housing to outer London Boroughs, yet at the same time seeks to prevent Boroughs from releasing poorly performing Green Belt and open space, will have a significant impact on delivery of new homes. This has the potential to make the draft London Plan unsound.

Recommendation
The London Plan should make it clear that the London Borough determine Green Belt and can in exceptional circumstances increase or more likely decrease Green Belt having such policy examined as part of a local plan review process.

User:	Silvertown Homes

Addressing London's 'housing crisis' may necessitate the release of land from London's Green Belt. The policy should not therefore preclude this.

The words 'it's de-designation will not' should be deleted from the Plan.

User: Lands Improvement Holdings

Policy G2 London’s Green Belt

Policy G2 is not consistent with national policy. The draft wording of the policy goes beyond the remit of the NPPF and includes constraints on development that are not justified. Policy G2 should be amended accordingly to reflect the NPPF.

The NPPF affords Green Belt the highest level of protection but recognises that in exceptional circumstances boundaries may need to be altered (NPPF83) and in very special circumstances development that might otherwise be considered inappropriate can be approved in the Green Belt (NPPF88). These fundamental principles of Green Belt policy, enshrined by the NPPF, should be reflected in the London Plan.

The NPPF expressly allows for green belt boundaries to be altered in exceptional circumstances through the preparation of new Local Plans. Whilst preparing a new local plan is not, of itself, an exceptional circumstance justifying alteration to a green belt boundary, the ability to make this planning judgement through the Local Plan process should not be fettered by the London Plan. Nor should the London Plan limit the discretion of London boroughs to find innovative solutions to meet and exceed their individual housing needs by placing a blanket ban on the Green Belt, which is not justified or consistent with national policy.

The NPPF requires the plan-making authority to understand the extent to which NPPF policies (including those in footnote 9) constrain meeting FOAN. That requires an exercise of planning judgment, as directed by NPPF83, of whether there are Exceptional Circumstances for the alteration of GB boundaries to both ensure their durability beyond the plan-period and understand the overall planning balance in respect of sustainable growth (to which NPPF14 and 182 are directed). A positive approach to evaluation of all reasonable alternatives based on proportionate evidence is therefore required.

NPPF83 requires an understanding of the relative merits of changes to the Green Belt so that a properly balanced judgment can be taken about the balance of benefits from different approaches. By doing so, the preferred strategy can emerge (and be seen to be) the "most appropriate" of all reasonable alternatives (NPPF182).

The draft London Plan is based on a constrained FOAN, therefore the extent of the shortfall is a matter of planning judgement. That judgement must, however, be 'justified' (in the sense of being the product of an evidence-based consideration of the relative merits of reasonable alternatives).

The GLA must have put itself in a position to be able to rationally undertake it by:

- Having assembled the evidence to be able to understand relative merits (i.e. both the parameters and effects of different alternatives and the underlying condition of the affected assets themselves, including the status of existing Green Belt land);
- Being prepared to then undertake a transparent exercise of considering the range of reasonable options and their relative costs and benefits.

Neither is the case in relation to the London Plan which is the product of improperly treating the Green Belt as a fixed constraint with no reference to the planning judgment of the relative benefits in terms of all facets of sustainability (including social and economic as well as environmental) of limited Green Belt release. The draft London Plan has failed to properly give effect to NPPF83, and the wider NPPF policies referred to above, which requires to see the "whole picture" on sustainability when making a planning choice about the constrained approach.

Given that the draft London Plan acknowledges that it will fail to deliver the homes needed over the next 10 years, alternative strategies should have been assessed. Including a review of the Green Belt, which identifies and weighs the social, economic and environmental costs and benefits of different options to understand the 'most appropriate' balance of sustainability between those interrelated elements. Without properly considering alternatives it is not possible to conclude that the submitted plan represents the most appropriate strategy in accordance with NPPF182.

Green Belt Review

The Green Belt was drawn up over 80 years ago. It does not reflect the needs and the opportunities of the present or the future. The quality of its contribution to the five purposes of Green Belt has changed. The importance of that contribution, relative to today and tomorrow’s pressures of housing stress (and its social and economic consequences) have changed.

Nothing has been done to understand the strategic value of the existing Green Belt to London and weigh its contribution against the opportunity costs of doing nothing. That is not positive planning for the most appropriate way to deliver sustainable growth.

LIH's site for example, is bordered on three sides by existing development; plays no role in preventing neighbouring towns from merging; has no historic significance; and is in an area where available brownfield land is already in such scarcity that the housing needs of communities in identified need of regeneration go unmet. The analysis behind the London Plan has not taken these exceptional circumstances into account as allowed for at NPPF83.

Change sought to Policy G2

For Policy G2 to be in accordance with the NPPF the policy should be amended (or words to the effect) as follows:

"A. The Green Belt should be protected from inappropriate development ***in accordance with national planning policy.***

~~i) *development proposals that would harm the Green Belt should be refused*~~

B. Opportunities to ~~*ii) the*~~ *enhance*~~*ment of*~~ *the Green Belt to provide appropriate multifunctional uses for Londoners should be supported.*

C. where appropriate, opportunities should be considered to make better use of Green Belt land that is not environmentally valuable, adjoins existing urban development and is well connected by existing or planning public transport.

~~*B.*~~ ***D.*** *The extension of the Green Belt will be supported, where appropriate.*~~ Its dedesignation will not.~~"

User: Mr Paul McQuillen

I welcome Policy G2 and particularly the proposal in Policy G2B that ‘de-designation’ of Green Belt will not be supported. This policy needs to be reinforced for it to be effective. **Proposed change:** A presumption against the alteration of Green Belt boundaries which reduce its extent should be included in policy G2B so that it reads: **‘The extension of the Green Belt will be supported and its de-designation will not. We will enforce a presumption against the loss of Green Belt’.**

User:	Clive Prior

- Green Belt should not be built upon save in the most exceptional circumstances
- Protecting the Green Belt requires stronger enforcement.

User:	Glynis Neal
Protecting the Green Belt requires stronger enforcement.	

User:	Paul Benedyk
Protecting the Green Belt requires stronger enforcement.	

User:	Barratt Developments plc

Addressing London’s ‘housing crisis’ may necessitate the release of land from London’s Green Belt. The policy should not therefore preclude this.

The words ‘it’s [sic] de-designation will not’ should be deleted from the Plan.

User:	Natalya Palit

The Mayor should give consideration to including within the supplementary text of draft Policies G1 and G2 that developments that could be considered to affect Metropolitan Land and Public Open spaces includes the expansion of airports.

User: Bovis Homes Limited

Policy G2 of the Draft New London Plan states

“A. The Green Belt should be protected from inappropriate development:

1. development proposals that would harm the Green Belt should be refused

2. the enhancement of the Green Belt to provide appropriate multi-functional uses for Londoners should be supported.

B. The extension of the Green Belt will be supported, where appropriate. Its de-designation will not.”

National Planning Policy relating to Green Belt can be found in Section 9 of the NPPF. The five purposes of including land in the Green Belt are set out there and are long-standing purposes.

There are three methods of allowing development in the Green Belt. Firstly, paragraph 89 sets out cases where development is not inappropriate development. The London Plan draft policy sets out that the Green Belt should be protected from inappropriate development and, by extension of this, we assume that appropriate development is supported. It may be useful for the London Plan to specifically refer to the definition in paragraph 89 of the NPPF.

However, the NPPF is more nuanced than Policy GB2 of the London Plan. It allows for ‘very special circumstances’ to be demonstrated that these may outweigh the harm to the Green Belt. The draft London Plan policy does not allow such an assessment, and as such, this element of the Policy is unsound and inconsistent with national policy.

The London Plan does set out the strategic context for the Borough Local Plans. It does not provide a detailed proposals map as this is identified at the more local level. Green Belt boundaries are to be identified at the Local Plan level.

National policy does allow for changes to Green Belt boundaries in ‘exceptional circumstances’. Such changes could be either a decrease in Green Belt land or an increase (i.e. adding to the Green Belt). However, in both such circumstances, exceptional circumstances must be identified.

The draft London Plan Policy does not provide such differentiation, nor does it align itself with national planning policy. What it seeks to do is support the extension of the Green Belt (without reference to the national planning test) whilst it does not allow any release of Green Belt land.

In itself, this Policy is therefore clearly contrary to national planning policy (and this is without the recognition that some Green Belt land will need to be released to meet housing needs). What it does, is set the boroughs a different test for Green Belt land to that set out in the NPPF.

Given that national planning policy applies across England, this approach cannot be correct. Local councils must have the ability to either increase or decrease Green Belt land as circumstances change.

As such, we contend that this Policy as currently drafted is unsound as it is inconsistent with national policy, and unjustified.

As such, we propose the following wording change to the Policy:

"A. The Green Belt should be protected from inappropriate development:

1. development proposals that would harm the Green Belt should be refused ***unless very special circumstances can be identified***

2. the enhancement of the Green Belt to provide appropriate multi-functional uses for Londoners should be supported.

~~B. The extension of the Green Belt will be supported, where appropriate. Its de-designation will not.~~ ***Any alterations to Green Belt boundaries should be undertaken through the Local Plan process****".*

The changes above will ensure that the Green Belt designation is protected in accordance with national policy. In addition, this would reflect the same test that the Mayor is setting out for Metropolitan Open Land (MOL) in draft Policy G3. The tests for both Green Belt and MOL are the same, and there is no reason why they should be treated any differently.

Indeed, to Bovis Homes' mind, the role that MOL plays in London is more important, particularly as densities increase in sustainable locations. Having a more stringent policy for Green Belt to MOL appears to be counterproductive.

The supporting text to Policy G2 sets out that even sites which do not provide significant benefits in terms of openness should be protected and are considered to contribute to biodiversity, flood prevention and reducing urban island effect.

The site in consideration has already been significantly surrounded by built development. Therefore, Bovis Homes consider that the contribution this site has to biodiversity, flood prevention and urban island effect has been substantially reduced by the existing surrounding built up areas. In the face of severe shortage of housing in Croydon and London as a whole, we struggle to understand why the GLA does not consider that suitable and sustainable sites within the Green Belt should be considered for release.

User: Buckinghamshire District Councils & Bucks Thames Valley Local Enterprise Parthership

Housing and Green Belt

3. We understand, welcome and support the Mayor's ambition to achieve a step-change in housing delivery in London, including affordable housing, in order to meet as much as possible of the needs of London's growing population within the Capital's boundaries. In order to provide longer-term certainty within and beyond the Capital, the London Plan should close fully the gap between the number of homes needed (66,000 a year for at least 20 years) and the supply of land to accommodate them (65,000 a year for the first 10 years of the Plan) by further exploring and exhausting all reasonable options for accommodating housing growth within London.

4. One such option is a comprehensive and fully justified review of the Green Belt within London. Given the planned shortfall between housing need and supply in London over the next 10 years and the Plan's acknowledged uncertainty about London's longer-term approach to housing capacity, it is not acceptable that the London Plan has failed to explore in full what scope there might be to release Green Belt in sustainable locations within London in order to accommodate housing and employment needs.

User:	London Borough of Sutton

SUPPORT WITH CONDITIONS. The London Borough of Sutton broadly supports Policy G2 but recognises that a broad brush approach may not be applicable in all circumstances, such as those identified in the preparation for Sutton's Local Plan, which identified an area of Green Belt that did not perform its functions and is being de-designated. As such, local evidence based decisions should take precedence on a broad theme of protection and de-designation.

User: Buckinghamshire District Councils & Bucks Thames Valley Local Enterprise Parthership

We agree that the Green Belt is fundamentally important. The National Planning Policy Framework (NPPF) is very clear that once established, Green Belt boundaries should only be altered in exceptional circumstances and National Planning Policy Guidance (NPPG) has clarified how Green Belt may affect the ability of an area to meet housing need. However, this does not and should not rule out a comprehensive Green Belt assessment as part of the evidence base to underpin the London Plan. Crucially such an assessment would allow consideration of how areas of the Green Belt within London perform in terms of the five purposes for the Green Belt set out in the NPPF and whether exceptional circumstances may exist that would justify the alteration of Green Belt boundaries.

10. We understand that development in the Green Belt can raise significant concerns in local communities and that any changes to Green Belt boundaries must be fully justified. Nevertheless Green Belt release is an option that all of the Buckinghamshire Districts are considering in their emerging local plans, as are local authorities in neighbouring Bedfordshire, Berkshire and Oxfordshire. Given the gap between the number of homes needed and the supply of land to accommodate them within the Capital, the London Plan should do likewise, and consider Green Belt review as part of the preferred Sustainable Intensification option.

11. Consideration of selective Green Belt release is particularly important given the Draft Plan's failure to provide any detailed housing targets beyond 2029. London's own evidence on housing need relates to a 20-year period and the Draft Plan runs from 2019 to 2041. 2041 has been chosen '… *to provide a longer-term view of London's development to inform decision making'.* The Draft Plan explains that the decision to set housing targets for the first 10 years only reflects the dynamic nature of London's housing market. It also means there will need to be a review of the housing targets well before 2029. We understand that strategic planning is inherently uncertain. This is why delivery against policy targets is monitored and policies are kept under review and, where necessary, rolled forward. The Plan represents the first full review of the land use and growth strategy for the Capital since 2011 and provides the framework to address the key planning issues facing London, including infrastructure planning which often has a long time horizon, and the longer-term needs of the economy. The South East and London are the drivers of the national economy and consistently deliver the largest net financial returns to the Treasury. This success is in part due to the strong interdependencies between London and the wider South East. In order to provide longer-term certainty within and beyond the Capital, the London Plan should include a policy (or policies) which demonstrate how London's housing needs will be accommodated beyond the first 10 years of the Plan period. Policy H1 should be amended to include targets for net housing completions to 2039.

User:	Jonathan Rooks
Protecting the Green Belt requires stronger enforcement.	

User: Heathrow Airport

The approach to Green Belt at Policy G2 requires that development proposals that would harm the Green belt should be refused, with no exceptions, that the extension of the Green Belt will be supported and its de-designation will be opposed, again with no exceptions. This approach is inconsistent with national policy, including the National Planning Policy Framework, which provides a degree of appropriate flexibility for local authorities to alter established Green Belt boundaries in exceptional circumstances through the preparation and review process for their Local Plans or to determine that very special circumstances exist for development proposals in the Green Belt.

The expansion of Heathrow Airport presents a situation where nationally significant infrastructure is supported in a Green Belt location by the independent Airports Commission and by Government through the emerging Airports NPS. .

Should Heathrow's expansion proceed, there will inevitably be an impact on the Green Belt, not only for the extended airfield but also potentially for the ancillary and associated developments that are likely to be needed to support the new airport (for example, road diversions, airport related employment development, airport maintenance and support facilities). Our current public consultation on our expansion proposals considers the potential extent of land that could be required close to the airport. Much of this potential requirement is on Green Belt land.

It is therefore important for the London Plan to recognise that such proposals could come forward and it should mirror the national policy tests for Green Belt boundary alterations and development proposals so that London Boroughs can appropriately plan for such development in their emerging Local Plans and in the determination of any relevant planning applications.

User: Luton Borough Council

It is made clear in the draft London Plan (Policy G2) that release of the Green Belt will not be supported, but that extensions to it will. Any further housing development would thus need to take place beyond London, potentially in places such as Luton. The Borough Council would need to have the opportunity to plan appropriately for any additional growth and or burdens arising from non-delivery against the draft London Plan housing targets.

As part of Luton's previous representation to the FALP, we recommended that the GLA undertake a comprehensive Green Belt Review. It is requested once again that as part of the draft London Plan, a review of the Green Belt is undertaken such that the GLA and its partners can better understand the real potential for housing delivery in London.This is particularly pertinent given the identification of the Growth Corridors on Figure 2.1 (The Key Diagram) and Policy SD1, which extend into and through the Green Belt. Linked to this is supporting text to Policy SD3 (Growth Locations in the Wider South East and Beyond) which acknowledges that although the draft London Plan seeks to accommodate projected growth, the impact of ongoing patterns of migration, barriers to housing delivery and potential future changes in projections means it is prudent to explore the potential for accommodating more growth in sustainable locations outside the capital.

Luton is considered a sustainable location, well linked by rail and with a growing airport and economic base. Luton Borough Council does and will continue to work with the GLA on cross-boundary regional planning matters. Like the London Mayor, Luton Borough Council acknowledges the impact of population movement to and from London, as well as commuting patterns, and continues to investigate this through its SHMA / OAN. However, Luton, like other boroughs and districts in the 'Wider South East' region outside of London, also has constraints which impact on the delivery of new housing and economic development. In Luton, these include, amongst others, the Green Belt, as well as the Chiltern Hills AONB. The Luton Local Plan has recently been adopted and, as part of this, a review of the Green Belt was conducted in line with guidance set out in the NPPF. Similarly, Luton Borough Council requests that the GLA, in association with the Green Belt boroughs in London, undertakes a full review of the Green Belt boundary to consider what opportunities exist for additional, sustainable growth locations in London before exploring opportunities further afield.

A full review of the London Green Belt (Policy G2) should be undertaken to identify how and where London can meet the housing need it is generating.

User: PRP

The Mayor is clear that the green belt will be protected from inappropriate development and this is in accordance with the provisions of the NPPF. However part B of this policy goes on to state that the 'extension of the Green Belt will be supported, where appropriate. It's [sic] de-designation will not.'

This is concerning from a strategic point of view for London. In reality the high target being placed on many out of London Boroughs will mean that they may need to consider the suitability of de-designating low quality green belt land in sustainable areas that could be used for the delivery of housing as part of their local plan process.

Furthermore, this policy position from the Mayor is slightly disingenuous. The basis for Crossrail 2 in chapter 2 of the draft London Plan is predicated on the delivery of 200,000 homes mainly around the northern and southern ends of the proposed line in a variety of opportunity areas. These opportunity areas are mostly areas of green belt which will require de-designation in order to come forward.

It is requested that the wording around the green belt policy within the London Plan should remain precautionary but also pragmatic towards boroughs looking to assess green belt sites which might be appropriate for housing.

User: Persimmon Homes

The policy is unsound because it conflicts with national policy.

The NPPF requires local planning authorities to establish their Green Belt through the preparation of Local Plans (paragraph 83). This allows for Green Belt boundaries to be altered in exceptional circumstances through the Local Plan. Policy G2 seeks to remove this ability. It is not considered that in line with the NPPF, it should be for individual local authorities to consider their green belt boundaries, how best they can meet their housing needs and discharge their Duty to Co-operate. The Mayor has not undertaken a strategic Green Belt review in order to assess whether its boundaries remains appropriate (either increased or decreased) and should not direct LPA's in this regard.

We concur with the HBF that Part B of the policy, therefore, should be re-drafted to reflect the national policy:

"B In preparing their Local Plans the Boroughs will:
1) extend the Green Belt in exceptional circumstances;
2) de-designate land in the Green Belt in exceptional circumstances."

User: London Borough of Newham

Policy G2 London’s Green Belt

LBN object to the rigid protection of Green Belt in the absence of a comprehensive strategic Green Belt Review. The London Plan overall fails to recognise and address the impacts of this approach, such as:

? Continuing to direct development to other locations where it could be less sustainable due to increased pressures on already strained infrastructure capacity and affordable housing and other community benefits squeezed out by land values and decontamination costs and higher land values and viability considerations squeezing out affordable housing and other community benefits (see also related comments to policy GG2 & H1)

? Further privileging more affluent areas at the expense of less affluent areas, for instance, in inequitable promotion of access to green space and associated environmental quality (such as reduction in heat island effects).

In response, the policy could do more to address the strategic principle of linking areas of MOL and GB through for instance the strategic deployment of green wedges.

User: CFGN Community Food Growers Network

As Sustain has highlighted in previous consultations, there needs to be **more recognition and link of the role that food growing and productive green space can have on physical and mental health**. In particular G8 needs to be reworded; whilst food growing is mentioned in a few places, it does not receive the coverage it deserves in regards to its current and potential role in delivering multiple benefits including:

- Healthy food, with lower greenhouse gas emissions
- Opportunities for connection with nature and activity promoting mental health
- Increased resilience through development of localised food systems
- Recreational and skills development
- Contribution to biodiversity

The current large number of Londoners involved and the multiple benefits that food growing projects have provided for the city deserves increased recognition and protection; without these spaces London would be a much less green and biodiverse city, as data continues to show from the Capital Growth programme, supported by the Mayor of London, London Food Strategy and previous London Plan.

We would like to see **more links made between the Greenbelt and potential for peri-urban agriculture, horticulture and orchard**s. We believe that a productive Greenbelt would be protected, rather than being left and therefore targeted for future development. Moreover, the application of organic and permaculture techniques for food growing could contribute significantly to biodiversity, soil retention, carbon sequestration and water management.

User: Legal and General Capital

Policy G2 London's Green Belt

Policy G2 is not consistent with national policy. The draft wording of the policy goes beyond the remit of the NPPF and includes constraints on development that are not justified. Policy G2 should be amended accordingly to reflect the NPPF.

The NPPF affords Green Belt the highest level of protection but recognises that in exceptional circumstances boundaries may need to be altered (NPPF83) and in very special circumstances development that might otherwise be considered inappropriate can be approved in the Green Belt (NPPF88). These fundamental principles of Green Belt policy, enshrined by the NPPF, should not be conflicted by the London Plan.

Heathrow Airport

A Green Belt Review should be undertaken of the wider area surrounding Heathrow in recognition of the major social and economic role the airport plays regionally and nationally.

Heathrow is the UK's only hub airport and is critical to the London and UK economy. Locally, Heathrow is also hugely important. Over 100,000 people, directly or indirectly, depend on the airport for work. Beyond aviation, Heathrow is also an economic hub for the clustering of office, commercial, industrial and logistic uses. The airport's future expansion will increase pressure to identify development land for jobs and homes nearby in LB Hillingdon.

The wider area surrounding the airport is constrained by Green Belt and the London Plan should proactively consider the implications of the expansion of the airport and the weight that should be afforded to the Green Belt where it could accommodate needs resulting from the expansion of Heathrow.

Wider housing context

The draft London Plan is based on a constrained FOAN. Given that the draft London Plan acknowledges that it will fail to deliver the homes needed over the next 10 years alternative strategies should have be assessed, including a review of the Green Belt that allowed it to properly identify and weigh the social, economic and environmental costs and benefits of different options to understand the 'most appropriate' balance

of sustainability between those interrelated elements. Without properly considering alternatives it is not possible to conclude that the submitted plan represents the most appropriate strategy in accordance with NPPF182.

Green Belt Review

The Metropolitan Green Belt was drawn up over 80 years ago. It does not reflect the needs and the opportunities of the present or the future. The quality of its contribution to the five purposes of Green Belt has changed. The importance of that contribution, relative to today and tomorrow's pressures of housing stress (and its social and economic consequences) have changed.

Nothing has been done to understand the strategic value of the existing Green Belt to London and weigh its contribution against the opportunity costs of doing nothing. That is not positive planning for the most appropriate way to deliver sustainable growth.

The Redbridge Local Plan underwent examination in June – July 2017. The Inspector Report (dated 24 January 2018) found the plan sound and, in relation to Green Belt release, stated the following;

"…without Green Belt sites the relevant housing requirement would not be met contrary to the aims of the NPPF and that there would not be general conformity with The London Plan…the recent record of housing delivery in Redbridge has been poor…

In short, there is insufficient deliverable or developable 'brownfield' land to meet the requirement. This is also in the context of a recent under delivery of housing and an objectively assessed need that is much higher than the target in The London Plan. In combination these factors are of very significant weight in favour of developing Green Belt sites. (IR paras. 72 and 73)"

With regard to further development on brownfield site, the Inspectors report states;

"Moreover, further intensification could have a significant impact on transport junctions and links and the character and townscape of the Borough. In short, the Council has done all it reasonably can to meet its housing requirement from existing 'brownfield' sites and to optimise potential but the result is that a shortfall..." (para 45)

This acknowledgement by the Inspector demonstrates that reliance on brownfield sites alone may have negative implications and that Green Belt release should be considered as a suitable alternative.

The Inspector's report continues to outline factors that support the release of Green Belt sites;

"The first is that the recent record of housing delivery in Redbridge has been poor… The housing required by Policy LP1 equates to only 51% of the objectively assessed need so that the "gap" between supply and need is a substantial one. Without greenfield allocations this position

would be even worse. These considerations mean that it is important for the Council to 'up its game' in terms of housing delivery as far as possible" (para 46)

This conclusion highlights the issue of ongoing consistent poor housing delivery against a gap between supply and need. Without a green belt review, the ongoing poor housing delivery situation is likely to worsen and this demonstrates a clear case for the release of Green Belt land. While, on average, 749 dpa have been completed in Hillingdon in the past 4 years, a significantly increased housing target from 559 dpa to 1,553 dpa in the draft London Plan is likely to be unachievable and have significant implications, resulting in a gap between supply and need.

The Inspector confirmed that even if a site serves one of the five purposes of the Green Belt, other material considerations may outweigh the need to retain the land within the Green Belt – in the Rebridge context previous under delivery of housing and a high demand are significant material considerations in favour of developing Green Belt sites.

The Local Plan for LB Hillingdon set an annual target of 425 dpa, which was increased to 559 dpa following the adoption of the Further Alterations to the London Plan in 2011. The new housing target for LB Hillingdon as per the draft London Plan is for 1,553 dpa which is a 178% increase on the current target.

In light of the proposed significant increase in LB Hillingdon's housing target, the limited availability of previously developed sites and the potential expansion of Heathrow the possibility for de-designation of Green Belt should be supported in London Plan policies to allow housing targets to be met.

User: Durkan

Policy G2 (Green Belt) provides continued protection for this designation but does not allow for the de-allocation of land. Policy G3 (Metropolitan Open Land) also provides continued protection for these areas but recognises that loss of this designation can be justified in exceptional circumstances, as set out in the NPPF, an approach which is supported.

Policy G2 does not recognise that some areas of the Green Belt are of a poor quality or do not meet the requirements and functions of Green Belt. It is considered that the Green Belt should be constantly reviewed for its usefulness, efficacy and public benefit, particularly brownfield sites. Local authorities should the ability to take a pragmatic approach and have scope to redraw boundaries where they are defunct or ineffective.

Therefore, Policy G2 should be amended to state that the de-designation of Green Belt will be supported in appropriate circumstances.

User:	CFGN Community Food Growers Network	
Amends		Justification
Policy G2 C	**Add *"Support will be given for schemes that utilise and protect the Greenbelt for food production, where this enhances the environment and amenity of the land."***	**We welcome the protection of the Greenbelt and feel this should be reflected in the policy. This should reference climate friendly food, increase food security and create green business opportunities.**

User:	Legal and General Capital

Green Belt

Policy G2 (page 225)

The IIA fails to recognise the inherent conflict between Policy G2 and other policies in the London Plan; for example, not meeting London's full housing needs (Policy H1).

In the absence of a Green Belt Review, Policy G2 is not supported by evidence and is therefore not justified.
The IIA appraisal of Policy G2 is not objective and fails to identify the negative elements of Green Belt protection, including failing to meet housing and affordable housing needs, forcing new development to leapfrog the Green Belt resulting in unsustainable commuting patterns, and increased pressure to develop on urban open spaces and employment sites to meet housing needs.

User: Affinity Global Real Estate

The Plan recognises the significance of the Metropolitan Green Belt in providing benefits to London, listing combating the urban heat island, growing food, and providing recreation space alongside containing further
expansion of built development, encouraging the re-use of brownfield land, and directing development towards inner urban areas.

In doing this, it is a concern that the Mayor is conflating green infrastructure with Green Belt, broadening the fundamental aim of establishing Green Belt boundaries and providing a false representation of reality. The
Plan recognises this fact in the following paragraph (8.2.2) detailing the presence of sites within the Green Belt that are derelict and unsightly but may still play a role in making positive contributions to biodiversity, flood
prevention and reducing the urban heat island effect.

Whilst it is appreciated the Plan seeks to avoid specifically repeating the policies of the NPPF, in this instance it fails to provide any consistency with those policies and in fact steps beyond the NPPF to a degree that is
ultra vires.

Part A of Policy G2 requires amending to comply with national policy and avoid any conflict in material policy considerations for future decision taking.

Accordingly, the following text should be added:
Part A
The Green Belt should be protected from inappropriate development:
1) development proposals that would harm Green Belt should be refused [insert] **except where very special circumstances have been demonstrated**

The purposes of the Green Belt are clearly stated at paragraph 80 of the NPPF. Paragraphs 82-86 then set out the circumstances in which Green Belt boundaries are established and amended through the production
and review of Local Plans.

The purposes of the Green Belt are clearly stated at paragraph 80 of the NPPF. Paragraphs 82-86 then set out the circumstances in which

Green Belt boundaries are established and amended through the production and review of Local Plans.

Whilst the significance of the Green Belt within the remit of the GLA is not understated, the NPPF is clear that Local Plans are the most appropriate means of assessing the contribution of the current extent of Green Belt, as well as reviewing whether amendments are necessary to deliver the development needs of the LPA. The Outer London Commission's report on accommodating growth in London emphasised the role of new transport infrastructure in unlocking new development, including through the undertaking of a Green Belt Review near these locations.

When producing their own Local Plans, LPAs within London will be required to assess the most appropriate method in meeting those growth needs as detailed within the London Plan. Finding the most appropriate way of meeting those needs will be LPA to decide, assessing various strategies against the policies of the NPPF and the London Plan, both read as a whole.

The NPPF encourages LPAs to amend Green Belt boundaries in exceptional circumstances in recognition that this may be the most appropriate way of delivering sustainable development when taking account of all development constraints. Paragraph 152 is clear that LPAs need to consider sustainable development in the context of three dimensions; economic, social and environmental factors. This may include, but isn't limited to, protection of environmental designations, the setting of heritage assets, proximity to supporting infrastructure, and/or deliverability of sites as defined by paragraph 47 and footnote 11.

Part B of Policy G2 and its supportive text is overly restrictive on the potential for LPAs to undertake their own Green Belt reviews in support of their respective Local Plans. There is a failure to recognise that current areas of the Green Belt fail to meet any of their purposes as defined by paragraph 80 of the NPPF. Significantly, it also fails to recognise that the release of Green Belt land when making a Local Plan can not only ensure the delivery of sustainable development but also result in the permanence of more valued areas of the Green Belt in the long term.

Accordingly, Policy G2 is not consistent with national policy and risks creating a framework which is ineffective in helping LPAs to meeting their development needs. We recommend the following further amendment to the policy:

Part B
~~The extension of the Green Belt will be supported, where appropriate. Its de-designation will not.~~

[Insert] **Boroughs are encouraged to undertake detailed reviews of their Green Belt boundaries taking account of the contribution of land to the purposes of the Green Belt, the need to promote sustainable patterns of development, and ensuring the permanence of the Green Belt in the long term**.

User: Barnet Society

Policy G2 – London's Green Belt

We agree that the enhancement of the Green Belt to provide appropriate multifunctional uses for Londoners should be supported – but more detailed guidance is needed as to what is 'appropriate'. We do not believe that this includes multi-use games areas with high security fencing, floodlighting and artificial surfacing, for example.

We would welcome more use of green spaces – which are a major feature of our area – for pedestrian and cycle travel between neighbourhoods.

User: Landscape Institute London

A – LI London considers that there needs to be a better definition of ‘inappropriate’ in order to protect the Green Belt from such development. It is recognised that the NPPF, Section 9, Clause 81 states that local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. However, many sport pitches are now artificial turf, which could be considered not very sustainable, whilst there is no direct mention of green recreation e.g. country parks, wildlife reserves, fishing lakes, etc.

LI London has concerns about some development itemised in Clause 90 as ‘not inappropriate’ in particular ‘mineral extraction’ and ‘engineering operations’ However, LI London is pleased to note that Policy SI11 Hydraulic Fracking states that development proposals for fracking should be refused, noting the high probability that these would be in the Green Belt or MOL.

A1) – Development proposals are already being approved which have the potential to harm the Green Belt.[2] The Landscape Institute will be publishing a new report concerning Green Belt policy in spring 2018 (based on an autumn 2017 consultation). A related 2016 report is available online[3].

[2] For example: http://www.bbc.co.uk/news/business-32998019 (2015). A useful map of current proposals to build on protected Green Belt land can be found here: http://londongreenbeltcouncil.org.uk/threats_map/
[3]https://www.landscapeinstitute.org/wp-

User:	Landscape Institute London

8.2.1 - Regarding the re-use and intensification of brownfield land, and as LI London pointed out in our response to the Draft Environment Strategy, whilst we agree in principle that brownfield sites are often good choices as development sites (see Policy H1 2), we consider that some brownfield sites may be valuable in their own right or as part of the much-needed connectivity for wildlife, particularly invertebrates. There needs to be more recognition of such supplementary habitat sites that are not recognised as part of the SINC network of priority habitats [4] [5]. A similar point appears to be made in 8.2.2 about some 'derelict and unsightly' parts of the Green Belt as a reason for protecting it.

[4] https://www.buglife.org.uk/open-mosaic-habitat-inventory
[5] https://greenrooftraining.com/beyond-roofs-brownfield-gardening/

User: The London Playing Fields Foundation

We strongly agree with the continued protection of London's Green Belt and by not allowing de-designation it will inhibit the ability of local authorities to enter into land swap agreements that would, if actioned, further threaten the site. Perversely, the protection planned for the Green Belt and Metropolitan Open Land in Policy G3 may **increase the pressure** on other playing fields not afforded the same level of protection.

This latter point is important because the playing pitch distribution across London is markedly uneven and of variable quality meaning that many users have to travel to outer London Boroughs to play, football, cricket and other sports where the supply of playing pitches is greater. Unless playing fields are protected, some outer London Boroughs with an apparent "surplus "of land may decide that they are surplus to requirements and can be sold for development.

For example, evidence from the recent Planning Inspector's report into the Redbridge Local Plan (January 2018) where the Council attempted to change the green belt designation that would have meant building houses on Oakfield Playing Fields in Hainault, provides further proof of the need for green belt protection. The planning Inspector stated:

"Oakfield and Ford Sports Ground have an existing function as playing pitches. Because of this they can be distinguished from the two other strategic housing sites that are to be released from the Green Belt. Having considered the wider implications of not developing those sites it is concluded that exceptional circumstances do not exist to alter the Green Belt boundaries as shown in the Redbridge Local Plan."

We therefore reiterate the need for a pan London Playing Field audit.

User:	The London Playing Fields Foundation

Para 8.2.1 …. Insert the word sport at line seven.

…. Providing space for **sport** and recreation.

In addition, the LPFF welcome the provision of appropriate ancillary facilities for outdoor sport and outdoor recreation as exemptions to building within the Green Belt. We also recognise that appropriate use of floodlighting for multi-use games areas, tennis courts and outdoor pitches should be included as this is often required to make the facilities sustainable in the long term. Additionally, indoor sports and leisure facilities that support loss making playing fields are also an appropriate ancillary use of green belt to provide a local community resource.

User: London Beekeepers' Association

Comments on Policy G2

? We strongly support the absolute protection of green belt land.

? There should be a presumption against the alteration of Green Belt boundaries that reduce its extent, and this should be included in Policy G2B.

User: Highgate Society

G2A - Object

While we strongly support the Mayor's commitment to support "the continued protection of London's Green Belt", the wording should be strengthened and clarified, to state that the Green Belt should be protected "from development," thus removing the word "inappropriate." Leaving that word in allows for a lot of debate and subjectivity over what is or is not inappropriate, and inevitably will lead to loss of Green Belt.

G2A.1 /G2A.2 - Comment

These sub-points contradict on another by first stating that harmful development should be refused, while recommending "enhancement… to provide appropriate multi-functional uses." Appropriate needs a closer definition to avoid unacceptable developments being approved through ambiguity and misunderstanding

User: London Borough of Ealing

CHAPTER 8: GREEN INFRASTRUCTURE AND NATURAL ENVIORNMENT

72. The Council welcomes the green infrastructure approach to planning green spaces and features and supports the continued protection of a network of green and open spaces.

73. However, in the context of significant growth, we are concerned about the preservation-like nature of a number of the policies in this chapter. The lack of effective and realistic policies for securing enhancements will do little to assist in helping these spaces fulfil their potential as a resource for a growing population.

74. The Council raised similar concerns in response to the earlier consultation paper on ‘A City for All Londoners’ and so it is disappointing that such matters have not in our opinion being satisfactorily addressed or actioned. As many of these concerns are still pertinent, a number are revisited here.

75. Ealing as a borough is somewhat unique, in that whilst it does not sit right on the edge of London it does contain areas of Green Belt on its western edge. When combined with Metropolitan Open Land, these designations account for 22% of the land area of the borough. Given the extent of spatial coverage the Council has considerable experience of dealing with applications for development affecting such areas. Given that the extent of Green Belt and Metropolitan Open Land has largely remained intact then the Council’s approach might be viewed as a success.

76. However, such policy designations and their associated policies have been less effective in improving the quality and or condition of such spaces or the degree to which they are functionally accessible to the general public. In certain cases the existing policies have in fact hindered our ability to secure such enhancements. Despite this, competing pressures to utilise these spaces for recreation and development continue to grow.

77. National policy principally sees Green Belt as an urban containment tool. Whilst the Council acknowledges this role too, it considers the existing aims and purposes in the NPPF to be too narrowly defined and would advocate an expansion of these purposes to also capture functions which reflect Green Belt’s role as a resource (for example, in recreational and landscape terms).

78. The emerging policy G2 similarly recognises the Green Belt's role in containing further built expansion, although it is noteworthy that it only highlights this purpose after first considering many of its other beneficial functions. Whilst the Council welcomes the recognition given to these other functions, it is disappointing however that when it comes down to it in relation to the process of managing development and defining boundaries policy G2 continues to rely heavily on the NPPF.

79. Paragraph 8.2.2 of the draft London Plan says that the Mayor will work with boroughs and other strategic partners to enhance access to the Green Belt and to improve the quality of these. Whilst we support this approach it remains to be seen how such enhancements will be actually secured.

80. The Council recognises that in setting Green Belt policy the Mayor must take his lead from national policy and therefore varying or expanding on this will be challenging. Nonetheless, the Mayor is best placed to lead such a debate and a full London Plan review is the opportune time to do this. It was for this reason that the Outer London Commission also recommended that a strategic; London wide review is carried out. In our opinion the decision to defer so heavily to the NPPF, rather than developing a policy which properly recognises the unique role of Green Belt in London, and in a context of growing population, represents a missed opportunity.

81. To make matters worse, there are a number of clear anomalies between Clause A of Policy G2 and the NPPF which only serves to confuse matters and some clarity is essential. Despite deferring to the NPPF for advice on the management of development within Green Belt, the policy text itself would appear to adopt a stricter line to that advocated by the NPPF, through ignoring the scope to make a case for inappropriate development through demonstrating 'very special circumstances', a well-established principle outlined in the NPPF. It remains unclear whether the Mayor is seeking to take a more inflexible approach to that permitted under the NPPF, or if the approach outlined in the NPPF is still relevant, and so this confusion ought to be clarified.

82. Similarly, Clause B of the Policy G2 advises that the Mayor will not support the de-designation of Green Belt, despite also referring to the NPPF which sets out the processes and considerations for defining Green Belt boundaries, and which in certain exceptional circumstances would permit de-designation. This direction is most unwelcome and such matters should be determined locally, unless it is underpinned by a strategic review.

83. Even if current national policy objectives are to prevail and are narrowly followed by regional policy, it is crucial that the extent of Green Belt in London is correct when viewed against the existing policy provisions.

84. The current geography of Green Belt in London was largely defined many decades ago, and despite clearly having regional significance

as a policy designation through shaping the pattern of London's development relative to its neighbours, the process of drawing up and reviewing boundaries has largely been left to the individual boroughs. The ad hoc and sometimes inconsistent nature by which Green Belt has been defined has given rise to many anomalies in its geography. Rather than forming a continuous band around London which separates London from neighbouring and distinct settlements, sections of it are more akin to a green wedge.

85. Whilst this arrangement clearly has merit in that it helps to bring the countryside into the urban area, it does little to contribute to its current (and perhaps primary) purpose of preventing urban sprawl. Moreover, such green wedges are sometimes fragmented or weakly linked and essentially form isolated islands surrounded by built areas.

86. Such green parcels it might be argued better reflect the characteristics of Metropolitan Open Land. Regional Planning Guidance 3 (1996), the precursor to the original London Plan, in fact acknowledged this situation and at the time advised that local planning authorities might consider reverting Green Belt land to Metropolitan Open Land (MOL). This advice was never however carried forward into the London Plan and based on the current geography it does not appear to have been heeded by the boroughs.

87. In light of the above, there clearly is a need for a pan-London review of Green Belt. Whilst the boroughs will need to implement any such changes, the GLA is best placed to oversee this, with input from the boroughs. The GLA already undertake similar exercises in the case of other strategic employment (SIL) and ecology (SMI) policy designations and so this process can and does work in practice. It is disappointing then that despite making representations on this previously, no such strategic review has been undertaken or initiated by the Mayor.

88. Whilst the Council recognises the scale of the task and understands the GLA's nervousness to take on such an exercise such a review need not be contentious. One of the weaknesses with Green Belt reviews undertaken to date, and a source of their critique, is that they frequently fail to put Green Belt first. Typically the main driver for carrying out such reviews has been to find land for housing. Whilst this cannot be ignored and may be a factor driving and underpinning a review, any pan-London review should in the first instance seek to identify opportunities to enhance this space, in the interests of making this space work more effectively to meet the needs of a growing population. The delivery of housing alongside this as an enabling tool might be an outcome of this but it would not necessarily be the central driver. Indeed, this is the approach that the Council has sought to take in undertaking its own Green Belt and MOL review, which is currently underway.

89. As noted above given the inverse relationship between Green Belt and Metropolitan Open Land any pan-London review should consider both designations simultaneously.

90. As with previous iterations of MOL policy in the London Plan, the new Policy G3 also defers to national Green Belt policy, although as with

policy G2 relating to Green Belt, on face value Clause A appears to adopt a more inflexible approach which disregards the scope to demonstrate ‘very special circumstances’. As MOL is unique to London, it does not need to rely on the NPPF in relation to Green Belt. It can and should set its own policy. Whilst MOL and Green Belt share certain common characteristics (i.e. their openness and permanence), their purposes are very distinct and the policy should be tailored to best serve MOLs function, defining its own tests for judging appropriate development and very special circumstances.

91. The risk of applying Green Belt policy to MOL is that Green Belt policy has a much narrower focus on openness and its structural function, and therefore it can be interpreted (rightfully or wrongly) as attaching less weight to any strategic functional use.

92. As an alternative to undertaking a Pan London review, or perhaps even to supplement such a review, the GLA should prepare advice for the boroughs on the methodology for undertaking local reviews. Such advice is particularly lacking at present in the case of Metropolitan Open Land, with policy G3 (D) only containing a brief description of the criteria used to define MOL, and this position would benefit from further commentary on how such criteria should be measured and interpreted.

93. Indeed, the absence of any advice on scale is a particular deficiency and has resulted in anomalies in the geography of Metropolitan Open Land across London. Again this was an issue highlighted by RPG 3 at the time, which called for greater consistency between Boroughs when designating such areas. Crucially such guidance should also seek to define the characteristics of Metropolitan Open Land and how it is distinct from Green Belt. This will be essential to ensure that the appropriate designation is used.

94. In defining criteria for Metropolitan Open Land it should not be constrained by the broad principles underpinning the definition of Green Belt, which at present disregards matters such as landscape quality and accessibility. It is therefore argued that these should also factor in any review of Metropolitan Open Land policy too.

95. In conclusion, a full structural and strategic review of Green Belt/MOL policy is needed to include environmental quality and recreation factors, with any boundary reviews following from this new methodology. Such a review together with the selective and perhaps partial release of some Green Belt/Metropolitan Open Land could be a prime mechanism to deliver the usable green space that is demanded by the huge demographic and housing growth in London.

96. The alternative to this will see a continuation of the present unsatisfactory situation. In Development Management terms this will involve LPAs continuing to manage applications in an ad-hoc fashion through the departure route and in Plan Making terms will involve individual LPA led reviews (typically driven by housing need). Both processes will frequently be underpinned by isolated thinking and lack the input of a strategic vision for the wider network of green space. The outcome of these processes will see a constant chipping away at the Green Belt

and Metropolitan Open Land which will only erode the usefulness of the policies and a popular willingness to accommodate new development.

User:	Wokingham Borough Council

WBC recognises the importance the government attaches to the protection of the Green Belt. However, in the context of a plan that does not propose to meet all its housing needs it is not considered a sound approach to seek the blanket protection of the Green Belt as proposed by Policy G2 in the absence of Green Belt review. This is of particular concern given that Policy G2 is supportive of extending the Green Belt ‘where appropriate’ which could further compromise the delivery of the planned growth by reducing the area of potentially developable land. The lack of a proper review of the Green Belt and the extent to which the land within it contributes to the purposes of the Green Belt means that this policy approach is not supported by any evidence. It is particularly inappropriate to adopt this approach when many planning authorities around London are undertaking such reviews and in some cases removing land from the Green Belt in order to meet their development needs.

User: London Chamber of Commerce and Industry

Policy G2 London’s Green Belt

84. The Metropolitan Green Belt limits the supply of land available to respond to London’s housing need and prohibits the use of vacant and poorly used brownspace sites that could be put to better use as homes for people who need them.

85. We recognise that any discussion making mention of ‘building’ and ‘Green Belt’ is contentious. However, our Brown for Blue report suggests a limited intervention, with suitable safeguards, to make best use of poor quality and undesirable land to help house London’s emergency workers.

86. LCCI believes this draft new London Plan offers the ideal opportunity to have a serious debate on the issue of Green Belt, and the use of the capital’s finite space.

User: Natural England

We support the proposals to improve the quality and function of the green belt. However we would also **recommend** that recognition should be given to the fact the greenbelt extends beyond the GLA boundary into the wider City Region. As such it is important to plan and consider its management and opportunities for improved delivery of biodiversity and natural capital at the landscape scale. London Boroughs need to work closely with neighbouring planning authorities to ensure this join up and to realise where strategic opportunities for environmental gains exist.

There is an opportunity through the WSE and GLA forum (noted in SD2, SD3) to consider strategic management of and investment in greenbelt, protected landscapes and other strategic green infrastructure. This is particularly relevant in light of future plans for public investment in land management that delivers ‘public goods’. A strategic approach to help maximise this opportunity should be considered. Natural England would be keen to help facilitate this conversation.

User: Wealden Land Ltd

NATIONAL PLANNING POLICY FRAMEWORK (NPPF)

These Representations have regard to the relevant paragraphs within the NPPF and their consistency with the principles and policies set out in the Draft London Plan, in particular, section 9 “Protecting Green Belt land”:

Paragraph 83 of the NPPF impresses that Local Planning Authorities should only alter Green Belt boundaries, in exceptional circumstances, through the preparation or review of the Local Plan. At which time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

Paragraph 84 continues: “When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development.”

Paragraph 85, provides further guidance to local planning authorities for defining Green Belt boundaries, including:

- ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- not include land which it is unnecessary to keep permanently open;
- where necessary, identify in their plans areas of ‘safeguarded land’between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period;

When considering a planning application, paragraph 89 lists a number of scenarios where the construction of new buildings is an exception to inappropriate development, including:

limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.

In summary, the NPPF places great importance on the protection of the Green Belt, whilst providing flexibility especially on brownfield land to allow local planning authorities to review Green Belt boundaries, where appropriate, to establish whether the land continues to meet the

purposes of the Green Belt, and to grant planning permission for new redevelopment so long as the openness of the Green Belt is respected.

In relation to previously developed land, paragraph 111 directs:

Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value. Local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land.

It should be noted that our client's land meets the environmental test above.

Paragraph 182 sets out the Tests of Soundness for a Local Plan to be assessed against to be considered sound. These representations consider the Draft London Plan as published against these tests of soundness, namely whether it will be:

(i) ***Positively prepared*** *– the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it reasonable to do so and consistent with achieving sustainable development;*

(ii) ***Justified*** *- the plan should be the most appropriate strategy, when considered against reasonable alternative, based on proportionate evidence;*

(iii) ***Effective*** *–the plan should be deliverable over its period and based on effective joint working on cross boundary strategic priorities; and*

(iv) ***Consistent with national policy*** *– the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.*

REPRESENTATIONS

POLICY G2 LONDON'S GREEN BELT

In accordance with the NPPF, Policy G2 seeks to protect the Green Belt from inappropriate development. However, part B of the Draft policy states:

“The extension of the Green Belt will be supported, where appropriate. It’s [sic] de-designation will not.”

This policy evidently goes beyond the directions of the NPPF and removes any flexibility for reviewing the Green Belt boundary, in relation to de-designation. This overly strict approach does therefore not meet the tests for soundness set out in Paragraph 182 of the NPPF, as it fails to be “consistent with national policy.”

The NPPF is clear in its direction that the review of Green Belt boundaries should be at the discretion of the local planning authority, yet the wording of this policy would remove the opportunity for local authorities to assess and determine the appropriateness of land remaining in the Green Belt, which in some cases may no longer meet the criteria and objectives of Green Belt land.

This complete removal of flexibility toward “de-designation” poses a risk to local authorities that may not be able to “satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period”, particularly given the mounting requirement to deliver housing at higher regional levels than the recent past. The policy as currently drafted, does not recognise the positive advantages that an appropriate review of the Green Belt may offer in terms of housing land availability, if certain non-performing parts of the Green Belt are released in the right circumstances, in accordance with the directions of the NPPF. This is especially the case for brownfield land opportunities that may exist.

Paragraph 111 of the NPPF directs that planning policies should encourage the effective use of land by re-using land that has been previously developed. The Draft policy not only removes the ability to “de-designate” Green Belt land, but goes beyond this, inferring that there should be no development in the Green Belt at all. This is expressed in the Draft supporting text, which although it acknowledges that not all parts of the Green Belt provide significant benefits, as they have become “derelict and unsightly”, also states that “this is not, however, an acceptable reason to allow development to take place.” This wording is worrying, as it implies that, contrary to the NPPF, any development, even that which is in the exceptions list to “inappropriate development”, is prohibited by the London Plan.

Our client welcomes the radical increase in housing numbers in the Draft Plan, but the ability to deliver such a quantum of sites within the built-up boroughs of London will be exceptionally difficult to provide because sufficient sites are not readily available. There are however, a magnitude of unsavoury brownfield sites within the Green Belt that are potentially available. Such sites present a significant opportunity if planning policy takes a more positive approach to support their short term release. In such instances, there is scope for environmental

enhancement which can bring about much improved quality of life for local residents. The release of modest pockets of brownfield land within the Green Belt may offer a relatively small amount of the required future housing supply but a very important contribution nevertheless. The London Plan must not be overly prohibitive in terms of restricting all development in the Green Belt, especially in relation to brownfield redevelopment opportunities.

Our client therefore strongly urges that the wording of this policy and its supporting text be reviewed, to ensure that a flexible stance is adopted, to comply with the NPPF.

User: West London Friends of the Earth

We very much support the Mayor's policies on protection of Green Belt and Metropolitan Open Land in Policies G2 and G3. But a third runway and associated infrastructure on Green Belt would be completely contrary to the principle of protection and should therefore be cited in Policy T8 as a reason for opposing Heathrow expansion.

Policy G2 says "The extension of the Green Belt will be supported, where appropriate. Its dedesignation will not." This should be strengthened to: "Its de-designation will be opposed." This is necessary so that the London Plan can be cited when proposals are made by Hounslow council and others build on Green Belt with 'airport related development' and/or de-designate Green Belt. A similar policy should be in place for MOL.

User: London Friends of Greenspaces Network

11. G2 We welcome Policy G2 and particularly the proposal in Policy G2B that ‘de-designation’ of Green Belt will not be supported. This policy needs to be reinforced for it to be effective.

Proposed change: A presumption against the alteration of Green Belt boundaries which reduce its extent should be included in policy G2B so that it reads: ‘**The extension of the Green Belt will be supported and its dedesignation will not. We will enforce a presumption against the loss of Green Belt’.**

Rationale: The release of Green Belt land is being proposed in numerous locations across London. There is a need for an increase in capacity to enable the GLA to follow up this commitment and to object effectively to any proposals for Green Belt release. Unless strongly resisted, the loss of Green Belt will seriously affect the ability of the Mayor to realise his ambitions for protecting and extending existing green space.

User: Gravesham Borough Council

The plan reiterates the longstanding commitment to preserving London’s Green Belt. It states that all of London’s growth will be accommodated without intruding on any Green Belt or protected green spaces (pg303).

An inevitable consequence of this approach is an increased focus on intensification and densification in urban areas especially areas with good transport links and town centres.
As highlighted above, some of the suburban Boroughs have raised concerns about this and should be allowed to determine themselves where the best locations of development should be. A Green Belt Boundary review can assist with this consideration of growth opportunities and should not be ruled out by the Mayor

User:	Sustrans
We welcome the protection of the Greenbelt as a means to prevent ‘sprawling’, car-dependent development patterns. We particularly support A2 to enhance greenbelt space and improve Londoners’ access to it by walking and cycling.	

User:	Mr Chris Rose

Could this please be made more nuanced in respect to brownfield, which is often high value for wildlife in the Thames gateway. I was dismayed to note Bexley drew up a brownfield register with no reference to wildlife value. The planning process is too bent in favour of development, and Cllr's understanding too limited to save 'brownfield' otherwise.

User:	Hornsey & Wood Green Labour Party

We welcome Policy G2 and particularly the proposal in Policy G2B that ‘de-designation’ of Green Belt will not be supported. This policy needs to be reinforced for it to be effective. Proposed change: A presumption against the alteration of Green Belt boundaries which reduce its extent should be included in policy G2B so that it reads: ‘The extension of the Green Belt will be supported and its de-designation will not be supported. We will enforce a presumption against the loss of Green Belt’.

User:	Mr John Davenport

As Kenley is located at the southern edge of Greater London, it includes a large area of GreenBelt land, and leads on to further extensive areas to the south. Thus Kenley should be given special protection, by severely limiting the amount of new housing, by the London Plan to avoid creeping urbanisation

User:	Redrow Homes London Division.

Addressing London’s ‘housing crisis’ may necessitate the release of land from London’s Green Belt. The policy should not therefore preclude this.

The words ‘it’s de-designation will not’ should be deleted from the Plan.

User: Mr Steven Robinson

Re - Policy G5 Urban greening and Policy G6 Biodiversity and access to nature (Chapter 8 Green infrastructure and natural environment)

I am writing to comment on the draft London Plan. I strongly support urban greening and would like to see more more green roofs/walls and trees in London, particularly street trees to benefit wildlife and the people that live in the city. I would also like to see requirements for new builds over a particular size to have to include internal nest spaces for species like swifts, house sparrows and bats, as the two bird species for example have experienced significant declines, partly due to the loss of nest sites when buildings are refurbished. A lot of London councils already have their own sustainable development policies, but there needs to be more implementation in terms of requiring developments to install things like swift nest places or green roofs. In short, I feel that there needs to be a shift in culture where urban greening/biodiversity is no longer the exception, but becomes more widespread in planning and hopefully the London Plan can help to achieve this.

User:	Sean Creighton
The CTUC/CA supported the protection of the Green Belt on the evidence on the Croydon Local Plan (Partial Rview).	

User: Crystal Palace Football Club Ltd

Regarding the policy on Green Belt (G2), we are concerned that the abbreviated wording of the policy as now proposed is inconsistent with national planning guidance. The wording of G2 (A) “development proposals that would harm the Green Belt should be refused” is inconsistent with NPPF paragraph 87, which states “Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances”.

We support the appropriate and pragmatic flexibility introduced within MOL Policy G3 that would, in appropriate circumstances, facilitate the positive reuse of existing MOL where other land might better serve such a MOL function. The same approach should be extended to relevant sites within the Green Belt, including where existing land fails to meet its defined purposes and/or fails to provide for appropriate or beneficial uses.

User: Lendlease

We fully support the Mayors' desire to maximise the delivery of housing on previously developed land and through intensification and we intend to continue to play a significant role in realising this.

Policy G2 (Part B) is inconsistent with national policy and prevents LPAs, when preparing Local Plans, from undertaking a full review of Green Belt boundaries, as they can do in accord with paragraph 83 of the NPPF. Furthermore, precluding its release is not an effective or justified strategy considering that the draft Plan is not meeting its housing need, even on its own terms, and as we have set out above, we have concerns regarding both the housing need and supply figures.

The draft Plan will rely heavily upon the outer boroughs to deliver a major increase in housing delivery through the adoption of new local plans, to further ask them to do while limiting the ambit of planning policy interventions available to them is not a justified strategy. This would prevent LPA's from pursuing broader planning policy aspirations, such as releasing a Green Belt site close to a station, where high levels of affordable housing could be delivered compared with a much more constrained brownfield site with marginal viability and ownership issues. Policy G2 B does not represent a justified or effective strategy in the context of London's acute housing need, it is not consistent with national planning policy and unreasonably restricts the choices available to an LPA. It is unsound.

Similarly, Policy G2 A is not in accordance with the NPPF, which does not impose blanket ban on development in the Green Belt. The NPPF sets out instances of development which is not inappropriate in the Green Belt (paragraphs 89 and 90) and explains that inappropriate development, which is by definition harmful, should only be allowed in 'very special circumstances'. The adopted London Plan (Policy 7.16B and para. 7.55) in effect defers to the NPPF, which includes detailed development control policies for the Green Belt in paragraphs 87-92. This approach should be maintained to ensure that the policy is consistent with national policy and therefore sound.

User: Kent County Council

Despite the commitment given to deliver housing growth within London boundaries, it is difficult to see how this could be achieved without a Green Belt review and potential dedesignation of areas within the inner edge of the Green Belt; particularly given the significant jump in delivery rates that will be required. It is not clear how Policy G2 in the draft London Plan is consistent with paragraph 84 of the National Planning Policy Framework (NPPF) and the need to promote sustainable patterns of development when reviewing Green Belt boundaries. As areas outside London are under significant pressure to undertake Green Belt reviews to accommodate high levels of growth, the same approach should be taken across London.

Furthermore, the policy could limit some London Boroughs' ability to meet their housing targets and place further pressure on Kent to accommodate London's housing need. The policy may also be found to be unsound and may not be adopted. This issue is exacerbated further by the MOL restrictions.

KCC encourages consideration of the importance of maintaining and delivering green and open spaces alongside housing, employment and infrastructure to ensure sustainable development. The delivery of green spaces alongside growth results in environmental benefits, including the enhancement of biodiversity and improvements in air quality. KCC would like to refer you to the Kent Environmental Strategy2, which provides a strategy to support the delivery of a competitive and resilient economy, with business innovation in low carbon and environmental services driving economic growth benefitting residents and business alike.

User:	Oneill Homer

G2 Neighbourhood plans may soon be able to make small housing site allocations in the Green Belt through changes to the NPPF. In our experience, the vast majority of local communities in the Green Belt around London will welcome this change to plan for affordable housing and community facilities especially.

User: Merton College and the Crown Estate

Merton / The Crown Estate appreciates the sensitivity associated with Green Belt policy and that the Mayor has made clear his intention to protect London's Green Belt. However, the analysis set out above supports the case for the allocation of some Green Belt land in order to meet potential shortfalls in housing supply. With this in mind it is important to consider the role of the Green Belt policy. As set out in the NPPF "The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. This is reflected in the five functions of the Green Belt contained within the NPPF as follows:

• to check the unrestricted sprawl of large built-up areas;
• to prevent neighbouring towns merging into one another;
• to assist in safeguarding the countryside from encroachment;
• to preserve the setting and special character of historic towns; and
• to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
The NPPF does encourage authorities to look for "opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land" However, first and foremost Green Belt is a land management policy that, by enclosing urban areas, seeks to preserve a clear distinction between 'town and country'.

With this fundamental aim in mind there is a rational argument for reviewing London's Green Belt boundaries. Within the Greater London boundary 22% of all land is designated as Green Belt with fourteen London Boroughs having more land designated for Green Belt than land occupied by housing6. Importantly the boroughs with the most Green Belt are amongst those boroughs that are identified for the most significant increases in housing delivery targets.
Furthermore around 60% of London's Green Belt is within 2km of an existing rail or tube station with this figure likely to increase with planned transport infrastructure improvements. This is an important consideration if the Draft London Plan is to meet its sustainable transport objectives of reducing reliance on the private car and improving air quality, and it is particularly relevant to the delivery of the strategic infrastructure needed to support London's sustainable growth, notably Crossrail 2.

Merton / The Crown Estate support the Mayor's commitment to delivering a manifest improvement in London's transport system through the

strategic infrastructure projects identified within the Mayor's Draft Transport Strategy. The capital investment required to deliver the aims of the strategy between now and 2041 is significant. At an estimated cost of £32.1bn Crossrail 2 represents a substantial proportion of the capital investment with London committed to fund more than half of the cost. TfL's evidence7 provided to the London Finance Commission showed that Crossrail 2 could deliver an extra £9bn in tax revenue and a land value uplift of 13.1bn in zones around Crossrail 2 stations. However, underpinning these figures is the premise that one of the main impacts of transport investment is that it unlocks land for development.

In 2016 the National Infrastructure Commission (The Commission) reviewed the extensive work carried out by TfL to support the strategic case for Crossrail 28. Central to the strategic case was TfL's projection that it has the potential to enable the delivery of 200,000 new homes in and around London. Underpinning the housing projection was a series of planning policy changes. In particular: an increased rate of industrial land release; an increase in housing density levels; and

'… densification around Crossrail 2 stations; including, where appropriate in specific cases, the limited release of Metropolitan Open Land (MOL) and Green Belt land.'

The Commission noted that realising the potential of Crossrail 2 to deliver 200,000 new homes is achievable but will require a number of strong measures, including the significant changes to planning policy outlined above. Without such measures The Commission concluded that there is little likelihood of the promised homes being delivered. Having regard to Green Belt/MOL release The Commission noted that

"… the release of limited parcels of such land around Crossrail 2 and connecting stations currently contributes at least 10% to Crossrail 2's housing goal of 200,000 new homes."

Any review of the Green Belt's boundaries needs to be balanced against the benefits of the land remaining designated as Green Belt. However, not all of the Green Belt provides green infrastructure benefits. Around 2% (722 hectares) of the Green Belt has buildings on it and there are also several hundred kilometres of road. Public access land and land that has an environmental designation accounts for only 22% of London's Green Belt. It is particularly telling that the Areas of Deficiency of local or district public space identified in the Mayor's Draft Environment Strategy closely coincide with the areas of London's Green Belt, reflecting the lack of public access to this resource. Allocating Green Belt land for development could therefore deliver new publicly accessible greenspace and contribute towards enhancement and protection of undeveloped parts of the Green Belt as envisaged in the Government's Housing White Paper, paragraph 1.39.

In light of the above, Merton / The Crown Estate maintain that in order to achieve a fully sustainable outcome the London Plan needs to consider among the exceptional circumstances for Green Belt review factors such as:

? ensuring housing delivery targets are met;
? strategic infrastructure necessary to support growth can be delivered;
? achieving sustainable patterns of development and
? enhanced access to green space and the creation of natural environments.

Green Belt Reviews
The evidence therefore requires that a strategy that relies on brownfield land alone will not be able to solve London's housing crisis. This has been the strategy of every iteration of the London Plan and as discussed above, it has consistently failed to deliver sufficient houses to meet objectively assessed need. Indeed this was the conclusion of the Outer London Commission who recommended a strategic review of the purposes of the Green Belt to

"… reduce London's reliance on large brownfield sites for housing delivery and help to both increase competition, overall housing delivery and industry capacity."9

Merton / the Crown Estate do not expect the Draft London Plan to identify specific areas of Green Belt release. Any alteration to Green Belt boundaries will need to be carefully considered and justified, on a site by site basis, through the preparation and review of Local Plans as set out in Paragraph 83 of the NPPF. However, Policy G2 Green Belt of the Draft London Plan categorically states that the de-designation of the Green Belt will not be supported. Merton /The Crown Estate consider that the Draft London Plan should allow boroughs flexibility to review Green Belt boundaries, if local assessments of capacity find that Green Belt sites are required to meet housing need. As such we suggest the following modification to Policy G2 Green Belt.

A. The Green Belt should be protected from inappropriate development:
1)development proposals that would harm the Green Belt should be refused except in very special circumstances;
2)the enhancement of the Green Belt to provide appropriate multifunctional uses for Londoners should be supported.
B The extension of the Green Belt will be supported, where appropriate. It' s ~~de-designation will not.~~ boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.

User: Corner Homes Group

In accordance with national guidance Policy G2 of the Draft London Plan maintains the strongest protection for Green Belt land and states that “the extension of the Green Belt will be supported, where appropriate. It’s de-designation will not”. This is not in line with national policy. At Paragraph 83 of the NPPF instead of discounting the de-designation of Green Belt land states how boundaries will only be altered in exceptional circumstances through the preparation of the Local Plan. CHG considers that the Draft London Plan should allow boroughs flexibility to review Green Belt boundaries, if local assessments of capacity find that Green Belt sites are required to meet housing need.

It is evident from the above in order to meet the housing targets proposed for London it may be required to consider Green Belt allocations particularly as boroughs with the most Green Belt are amongst those that has been the most significant increase in housing delivery targets. As such it is suggested that Policy G2 is modified to conform with the NPPF, and its wording should make it clear that the need to solve London’s Housing crisis is a factor to be given significant weight when considering exceptional circumstances for Green Belt review.

A. The Green Belt should be protected from inappropriate development:
1) development proposals that would harm the Green Belt should be refused except in very special circumstances;
2) the enhancement of the Green Belt to provide appropriate multifunctional uses for Londoners should be supported.
B The extension of the Green Belt will be supported, where appropriate. It’ s ~~de-designation will not.~~
boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.

It is also considered that the supporting text to this policy should be made to the fact that suitably located sites, particularly sites that are located within close proximity to transport hubs, should be promoted. Such intensification of development in these locations will assist in creating sustainable developments.

The Outer London Boroughs have been identified for substantial rises in their housing delivery targets and through an increased reliance on small sites. It is considered that in order to meet such targets that certain Green Belt sites need to be assessed further as to whether they are suitable for delivering sustainably located housing. Flexibility for this needs to be drafted into the wording or supporting text for Policy G2.

User: Kent Leaders

The commitment to growth within the London boundaries is supported. However, it is hard to see how the combination of 1) ruling out the de-designation of any areas within the inner edge of the Green Belt and 2) housing targets that will require a significant jump to delivery rates, will not result in placing significant pressure on meeting London's needs beyond the outer edge of the Green Belt. It is questionable if this is the most sustainable pattern of development.

The significance of paragraph 84 of the National Planning Policy Framework (NPPF), and in particular the need to promote sustainable patterns of development when reviewing Green Belt boundaries, should not be under-estimated, and was indeed a key issue raised at a number of Local Plan examinations2 . It is not clear how the London Plan accords with this paragraph of the NPPF.

With areas outside London being under pressure to commit to, and undertake, greenbelt reviews in order to accommodate high levels of growth, this same approach should be consistent across London. However, Policy G2 "London's Green Belt" is much more restrictive than national policy and would not create a level playing field between Local Plans outside London governed by national Green Belt policy and those within London.

Furthermore, the risk of adopting a policy that is much more restrictive to growth, in favour of strong Green Belt protectionism, will risk a reduction in the ability of London Boroughs to plan to meet their needs in their Local Plans. It is noted that a further proportion of the capital is also protected as "Metropolitan Open Land" where restrictions similar to Green Belt apply. The knock on effect will be that areas outside London are expected to accommodate a higher proportion of London's housing need in the future – which will likely be beyond the annual 1,000 houses already acknowledged in the draft London Plan.

User: London Stansted Cambridge Consortium

London’s Green Belt (G2 and G3)

LSSC and our partners understand the argument for the continued protection of London’s Green Belt and Metropolitan Open Land, in accordance with the National Policy Planning Framework (NPPF). However, in light of high housing and employment targets partners call for a more open discussion around the Green Belt and greater flexibility to adopt tailored approaches where locations are of poor quality, have low environmental importance and are not accessible for leisure use.

Partners agree that housing delivery may not be possible without some release of Green Belt land and in the absence of a clear strategy the release of green belt will be piecemeal and may not take into account strategic considerations. An amendment to the policy could provide the corridor with a means of accessing development potential of strategic sites more easily.

User: London Stansted Cambridge Consortium

London’s Green Belt (G2 and G3)

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User:	South East England Councils

ii) The draft Plan reiterates the Mayor’s protection of London’s Green Belt (Policy G2) and other green/ open spaces (Policy G3-G4).

? Given councils outside London already have to consider Green Belt review to accommodate their own assessed housing need, we ask the Mayor to show leadership and encourage review at London-wide level – or explain his justification for not doing so. This is particularly relevant given that the draft London Plan shows a 1,000 homes pa gap between demand and supply.

User: Support Oakfield Society

Weighing the benefits of Green Belt v Development

The new London Plan places great emphasis on the value of Green Belt and Social Infrastructure. But our experience is that, in practice, these factors can be viewed by boroughs as impediments rather than planning aspirations.

SOS submitted a local petition by nearly 2,000 people to the London Borough of Redbridge (LBR) in early 2013 (which resulted in the withdrawal of Oakfield from the Local Plan) and then a 4,906 person Parliamentary Petition to the House of Commons in February 2014. Subsequently, SOS continued to speak against the inclusion of Oakfield in the 2017 Redbridge draft Local Plan (RLP). Nevertheless, LBR continued to keep the Oakfield Green Belt parcel listed as an Opportunity Site for 800 homes, a school and a clinic.

The Planning Inspector found the Redbridge Local Plan (RLP) unsafe on the grounds that LBR had not identified an alternative ground that would meet the future demand for sports pitches. LBR withdrew Oakfield as an Opportunity Site on the advice of the Inspector so as to avoid the Plan being found to be unsound. (The Planning Inspectorate File Ref: PINS/W5780/429/10)

Thus, the fact that Oakfield is “used” and needs to continue to be used for sport is key to protecting its Green Belt status. The Oakfield Green Belt site would have been lost were it not for the good quality SPORT played there and the resulting social benefits arising as organised by the sports clubs and their organised volunteers.

And yet, the new London Plan places little emphasis on organised sport and its value to the community. Because we USE the Oakfield Green Belt for sport we do not LOSE it. Or will we?

LBR have shown that they can again review the Green Belt boundary if the benefits of dedesignation become demonstrably weightier, i.e. if their housing targets increase. We have severe doubts that the housing targets for Redbridge in **Policy H1** and **Table 4.1** can be said to have been objectively assessed – as we iterate show below and explain in our Appendix.

If Councils can review the Green Belt boundaries, this begs the question, when is Green Belt Green Belt?

User: Support Oakfield Society

New London Plan threatens the Green Belt and Sports Fields

The new London Plan should demonstrate clearly that protection of existing Green Belt is a primary target (not just an 'aim').

In spite of the warm words contained in **Policy GG1 (Building strong and inclusive communities)**, which we applaud, the new London Plan re-opens the door for Councils to conduct more reviews of Green Belt boundaries while paying scant attention to social infrastructure (including sports and recreation facilities).

Our concerns revolve around the difference between **MUST** and **SHOULD**. Whereas boroughs ***should*** value their green spaces and social infrastructure they ***must*** deliver more housing. Our experience of the LBR Local Planning process is that Green Belt boundaries are reviewed with the aim of reducing green spaces (rather than an objective assessment against the tests specified in the NPPF). In addition, social infrastructure is hardly addressed at all, in spite of the diversity and inequalities found in London. The new London Plan does address those issues at length but weakly compared to the starkly stated numerical numbers for housing growth.

Hence the new London Plan does make policy statements in favour of protecting Green Belt spaces and encouraging social infrastructure ***but***:
? **Policy H1 (Increasing housing supply) and Table 4.1** contain revised 10 year targets for net housing completions (2019/20 – 2028/29) that "*Boroughs **must** include . . . in their Development Plan documents". This will encourage Councils to review their Green Belt boundaries because there is nothing in the London Plan to proscribe this.*

This is because green and social infrastructure are framed in a non-mandatory, weaker idiom:
? For example, the talk of "***aims** to accommodate . . growth . . without intruding on . . Green Belt"* in **Spatial Development Policy SD3, 2.3.1** and
? repeated used of "***should***" in **Policies S1 (Developing London's social infrastructure)**, and **S5 (Sports and recreation facilities)**.
? **Policy G1 (Green infrastructure), A** *London's network of green and open spaces, etc., . . . **should** be protected . . . .* ***B*** *Boroughs **should** prepare green infrastructure strategies . . . for sport and recreation.* ***C*** *Development Plans and Opportunity Area Planning Frameworks **should** : 1) identify key green infrastructure assets. . . . 2) identify opportunities . . . through strategic green infrastructure interventions.*
? **Policy G2 (London's Green Belt)** is also weak. It says, **A** ***The Green Belt** **should** be protected from inappropriate development:*
? *development proposals that would harm the Green Belt **should** be refused*

? *the enhancement of the Green Belt to provide appropriate multifunctional uses for Londoners* ***should*** *be supported.*
? ***B*** *The extension of the* ***Green Belt*** *will be* ***supported, where appropriate [!!]****. It' s dedesignation will not. [Note: It's '****Its****' not '****it's****]*

It is not right that having gone through the full rigours of Local Planning over the lengthy period from the 2008 Core Strategy Review through multiple full Local Council debates on the evolving proposals, the full procedures of public questions, deputations and open consultations, Planning Inspector hearings as appointed by the Secretary of State and multiple Main Alterations to the Local Plan leading to a settled 15 year Local Plan, that the new London Plan should now provide Borough Councils with opportunities to resurrect Plans that have only just been found to be unsafe.

We are very concerned that LBR has a history of commissioning successive so-called independent reports on both Green Belt boundaries and Sports facilities until they obtain the outcomes they want.

Furthermore, to rub salt into the wound, the new London Plan grounds the mandatory housing targets in *Policy H1 (Increasing housing supply) and Table 4.1 contains revised 10 year targets for net housing completions (2019/20 – 2028/29)*. The statistics in this Policy differ significantly from those produced only a few years ago in the 2015 Plan which indicates the dangers inherent in long term projections. This current round precedes the outcome of Brexit negotiation which may well alter London's future population trajectory. Furthermore, not much progress at all has been made with regard to collaboration on the rest of the South East planning. Not least, Table 4.1 was published prior to the latest international migration data published on 22nd February just gone.

We believe there should be a moratorium on any change in Green Belt boundaries until after the outcome of the Brexit negotiations is known and understood. Meanwhile, ten-year projections of population and housing needs must be treated with a high degree of circumspection. When Green Belt and sports and recreation fields are lost, they are lost forever. That is bad enough. When they are lost due to long term projections that can be worrying. When the long-term projections are questionable that is tragic.

Our detailed suggestions and comments on policy wordings in the draft London Plan are attached – "**Comments on the wording of the draft London Plan**".

We reflect on the population projections and housing targets in our **APPENDIX – "Housing targets in the new London Plan**". This is also attached.

User:	Support Oakfield Society
The extension of the Green Belt will be supported, where appropriate. It’ s de-designation will not. *[This should be ‘Its’ without the apostrophe.]*	

User:	Support Oakfield Society
8.2.1 The Mayor strongly supports the continued protection of London's Green Belt. The NPPF103 provides a clear direction for . . . . . London's Green Belt makes up 22 per cent of London's land area and performs multiple beneficial functions for London, such as combating the urban heat island effect, growing food, and providing space for *[Insert: 'sport and . . ' Reason: clarity.]* recreation. It also provides	

User: Broxbourne Borough Council

Broxbourne is delighted that London is seeking to meet its current development needs within its borders whilst continuing to protect the Green Belt · and London's metropolitan green spaces . This helps to relieve the growing pressure on this and other home county boroughs and districts that have witnessed major increases in their housing needs. Those recent increases have been largely generated through the government's migration projections which contain substantial out-migration from London and as a result, Broxbourne will already be helping to house large numbers of Londoners. Ironically, this Council must release significant areas of the Metropolitan Green Belt to meet this increased need. The consequent ability of London to protect the Green Belt within its borders is a consequence of our sacrifice.

I regret that Broxbourne is unable to contemplate any further Green Belt releases to meet London's housing needs, either directly or through the Government's migration "planning". Its urban and suburban areas are also constrained with no potential to meet more than Broxbourne's own needs in the future. However, there are mutual economic opportunities which I outline further on in this response

User:	L&Q

Green Belt

Addressing London's 'housing crisis' may necessitate the release of land from London's Green Belt. The policy should not therefore preclude this.

The words 'it's [sic] dedesignation will not' should be deleted from the Plan.

User: Local London Partnership

Green Belt: The draft London Plan supports the continued protection of the Green Belt from inappropriate development. Policy G2 aims to accommodate all of London's growth within the capital's boundaries and without 'intruding on its Green Belt'.

Whilst some Local London boroughs view the draft London Plan Policy as the right approach to the Green Belt other Local London boroughs are concerned that Policy G2 does not refer to NPPF policy regarding development in the Green Belt.

The latter are concerned that it includes simplified wording that seems to offer less scope than at present to consider individual proposals, or 'very special circumstances'. Until the NPPF is amended, the London Plan's absolutely no de-designation' stance is contrary to national policy.

This could unnecessarily restrict some Local London Boroughs, as part of their Local Plan function, in carrying out a robust assessment of Green Belt in accordance with the NPPF and potentially demonstrating 'exceptional circumstances' to go into the Green Belt to meet significant housing and infrastructure needs. (A recent example has been the LB Redbridge Local Plan where this approach was fully endorsed by the Local Plan Inspector).

User: Taylor Wimpey UK

Policy G2 London's Green Belt

This policy should be amended to reflect NPPF Paragraphs 82, 83, 84 and 85 that set out circumstances where existing Green Belt Boundaries may be altered and new Green Belt established .

User: S Horne

Re Pol G2

We agree that the Green Belt must not be built over everywhere. However, on Google properties can be found listed in detail, where owners want to offer for sale for building their homes which are in Green Belt!

The whole intentions of London Plan are to build anywhere & everywhere. We don’t want Essex or LB Havering to become covered with roads, houses & flats. We want to live in green, pleasant areas with trees, hedges & fields among the housing areas which have grown up over the last 50 – 80 years. Sadly, our green areas are disappearing, particularly Harold Hill area.

User: Cirrus Land and The Guinness Partnership

Since we consider it essential that higher housing delivery rates are achieved, including the provision of higher rates of housing, but are also concerned that Boroughs will not be able to deliver all the housing that is needed - we slo request that a review of the Green Belt is undertaken in order to identify additional sources of housing land supply.

In particular, there should be focussed reviews of the Green Belt in locations within currently defined Growth Corridors and Opportunity Areas and on land which is closely related to existing urban centres and existing or planned transport hubs. This would enable there to be a clear focus upon the consideration of sites such as Yiewsley Waterside which indludes despoiled Green Belt land where anti-social behaviour, unlawful uses, fly tipping, contamination and invasive species are rife and would not only unlock land for much needed housing (including affordable housing) but also provide a wealth of sodial, economic and ecological benefits to London and its residents.

User: Cirrus Land and The Guinness Partnership

The development proposals associated with Yiewsley Waterside will create a new, strong and defensible boundary for the Green Belt, a safer and more accessible Colne Valley Park and a high quality waterside leisure destination in a sustainable location which utilises new transport infrastructure at West Drayton while meeting the future development needs of Greater London and Hillingdon.

In order to set a physical framework for its containment, it is proposed that the River Colne is used to define a new and long-standing Green Belt boundary in this location as it does further north at Uxbridge Moor and West London Industrial Park. In doing so, the proposed new Green Belt boundary would release sufficient land which would be capable of delivering a sustainable pattern of development (i.e. the land at Yiewsley Waterside is within close proximity of Yiewsley town centre and West Drayton railway station), which is well related to the existing urban area.
Although the Core Area of Yiewsley Waterside is currently designated as Green Belt, it includes a number of urbanised elements, including a marina, a disused waste transfer station and a mixture of small scale industrial and commercial uses. In addition, a significant part of the Core Area comprises made ground which results from historic landfills.
The Core Area is also physically contained as a result of its topography and the presence of dense vegetation and water bodies around its western/south-western boundaries; and by existing built development along the north-eastern and south-eastern boundaries. The choice of the River Colne as a proposed new Green Belt boundary would also serve as a permanent and defensible barrier.

When assessed against the five purposes of the Green Belt it is considered that land within the Core Area of Yiewsley Waterside should be released from the Green Belt, in order to make a contribution towards meeting the housing needs of London and Hillingdon:
• Development in this particular location will not result in the unrestricted sprawl of Yiewsley. It is proposed that the River Colne would serve as the new Green Belt boundary, which is defensible and capable of serving as a permanent, long-term boundary.
• It performs no role in preventing neighbouring towns from merging.
• Land within the Core Area does not comprise open countryside. Instead, it contains various urbanising elements and is physically contained by its topography and by existing built development (as described above and shown on the photographs included in this response). Its development would not, therefore, result in the encroachment of the countryside.

• There are no historic towns within the wider area. As a result, the development of land at Yiewsley Waterside would not result in any visual harm to the setting and character of an historic town.
• The redevelopment of the Core Area of land at Yiewsley Waterside would assist in promoting urban regeneration in this particular area,

including the remediation of contaminated land (resulting from historic landfill), the removal of nuisance uses from the site (i.e. unregulated industrial uses) and the removal of significant areas of land covered by non-native invasive species. It would also act as a catalyst for future redevelopment and regeneration in the wider Yiewsley area (including within the defined Regeneration Area as part of the Yiewsley Waterside proposals), which would take advantage of the greater accessibility and connectivity of the area which will result from the opening of Crossrail in December 2019.
The development of this site will not result in the loss of land which performs any of the key roles of the Green Belt. The designation is erroneous in this location. The damaged and previously-developed or made ground character of the land is even more evident on inspection (see above photos).

User: Cirrus Land and The Guinness Partnership

REQUEST FOR A REVIEW OF THE GREEN BELT (POLICIES SD1 AND G2)

In order to ensure that the New London Plan can deliver its housing targets across Greater London and in particular in Hillingdon Borough, including the provision of affordable housing which accords with policy requirements, we request that a targeted review of the Green Belt is undertaken.

Our responses that include our request for a review of the Green Belt are included below, i.e. in relation to Policies SD1 and G2. In addition, please also see below our responses to Policy GG2 and in relation to the Key Diagram, which further expands our responses.

In specific terms, we request that there is a focussed review of the Green Belt in the Borough of Hillingdon within the Elizabeth Line West Growth Corridor and Opportunity Area. In particular, on and within the Green Belt which is closely related to West Drayton railway station (which will be served by Crossrail from December 2019) and Yiewsley town centre. Within this particular area of interest is land proposed by the promoters called Yiewsley Waterside

User: Cirrus Land and The Guinness Partnership

POLICY G2 LONDON'S GREEN BELT

We object to the wording of Policy G2(B) which states that the "*de-designation*" of the Green Belt will not be supported.

As we have argued in relation to other policies and proposals of the New London Plan, there should be a review of the Green Belt in order to ensure that the Plan can deliver the number of dwellings that are required to meet London's needs. At the very least, we consider that the Plan should allow for any Local Planning Authority that wishes to undertake a review of the Green Belt in order to ensure that it can meet the housing targets set by the New London Plan. Indeed, and in this regard, we consider that the decision not to promote a review of the Green Belt fails to take into consideration sites requiring remediation located within the designated areas which could be released and identified for large-scale sustainable development, relieving pressure on and protecting existing urban areas, particularly more suburban locations.

As currently drafted, the New London Plan and Policy G2, is unsound because it conflicts with the guidance provided at Paragraph 83 of the NPPF, which requires and allows for LPAs to review and alter their Green Belt boundaries in exceptional circumstances through the preparation or review of their Local Plans.

Furthermore, we consider that the New London Plan should go further and take the opportunity to identify opportunities now for Green Belt releases in sustainable locations. In doing so, we would recommend that the Mayor undertakes a focussed review of the Green Belt within what are currently defined in the New London Plan as Growth Corridors and Opportunity Areas. This should include land which is close to transportation nodes and hubs, particularly where this could encompass previously-developed land (including made ground) contaminated land and anti-social behaviour hot spots.

We consider that by undertaking a focussed review of the Green Belt, as described above, it could deliver significant growth in locations that are served either by existing or proposed public transport improvements (i.e. such as Yiewsley Waterside with its close proximity to Crossrail).

In this case, Yiewsley Waterside does not provide "*multiple beneficial functions*" of Green Belt, as suggested in paragraph 8.2.1 of the New London Plan. The land in question at Yiewsley Waterside does not involve land which is used or best used for growing food. The land, in fact, contains contaminated land, a disused waste transfer station, a mixture of non-complying industrial uses and historic landfills and is a hotspot for anti-social behaviour. Furthermore, by keeping this land in the Green Belt, it is holding back the development of land comprising

predominantly previously-developed land or made ground, which is not helping to drive forward the re-use of London's previously-developed land (as also envisaged by paragraph 8.2.1).

Indeed, we do not consider that the development of a site such as Yiewsley Waterside will deprive inner urban areas from regeneration and investment, as suggested in paragraph 8.2.1. In fact, given that it is likely that London will need to find significant additional sources of supply of land to meet its housing requirements, we consider that London will need the development of land in both inner and outer urban areas if it is to achieve a step-change in housing delivery – this includes previously-developed land (including made ground) in the Green Belt.

We are also concerned about the approach taken in paragraph 8.2.2 of the New London Plan where it is stated that a Green Belt site being derelict and unsightly is not an acceptable reason why it should be developed. We consider that such an approach will do nothing to help the improvement of sites which are in immediate need of remediation (for example to address issues of contamination or the increasing presence of invasive non-native ecological species). Indeed, in most cases, there are not the funds available to make such improvements without development. In any event, the improvement of such sites should be considered as being a contributory reason for the removal of the site from the Green Belt. Particularly where it can be demonstrated that the site includes previously-developed land or made ground, is contaminated and which is located in close proximity to existing centres of development and existing or planned transport hubs (such as railway stations).

Similarly, whilst paragraph 8.2.2 refers to derelict sites in the Green Belt making "*positive contributions to biodiversity, flood prevention, and reducing the urban heat island effect*", these things should not be viewed in isolation as being reasons why such sites cannot be released from the Green Belt. Again, and as stated above, such sites should be considered for release from the Green Belt, where it can be demonstrated that they: do not involve statutory ecological designations and can deliver biodiversity enhancements; avoid areas at highest risk from flooding; comprise previously-developed land (including made ground); and are situated in sustainable locations.

- **Request**

In order to ensure that the New London Plan can deliver sufficient land to meet the needs of Londoners, we request that further consideration is given to making changes to Policy G2 and to other related policies and proposals concerning the protection of the Green Belt. In particular, consideration should be given to enabling there to be focussed reviews of the Green Belt within what are currently defined in the New London Plan as Growth Corridors and Opportunity Areas in order to identify sustainable locations for development.

To this end, we also request a focussed review of the Green Belt in LB Hillingdon within the Heathrow/Elizabeth Line West Growth Corridor is either undertaken through the New London Plan or identified as part of the work which will need to be undertaken in the next review of the

Hillingdon Local Plan Part 1.

A description of the Yiewsley Waterside proposals and an outline of the arguments in favour of the proposed development and its release from the Green Belt is given in the introduction to our response to the New London Plan.

User: Berkshire Strategic Planning Group

Green Belt
The Berkshire authorities recognise the importance the government attaches to the protection of the Green Belt. However in the context of a plan that does not propose to meet all its housing needs **it is not considered a sound approach** to seek the blanket protection of the Green Belt as proposed by Policy G2 in the absence of Green Belt review. The lack of a proper review of the Green Belt and the extent to which the land within it contributes to the purposes of the Green Belt means that this policy approach is not supported by any evidence. It is particularly inappropriate to adopt this approach when many planning authorities around London (including some of those in Berkshire) are undertaking such reviews and in some cases removing land from the Green Belt in order to meet their development needs.

User: Roxhill Developments Ltd

Policy G2

London's Green Belt

Roxhill wishes to object to the draft Plan's Green Belt policy insofar as it is inconsistent with national planning policy, particularly the omission of the 'very special circumstances' and 'exceptional circumstances' elements that are a long established and important part of planning for developments in Green Belt locations.

Suggested policy wording

A) The Green Belt should be protected from inappropriate development:

1. ~~development~~ proposals **for inappropriate development in** ~~that would harm~~ the Green Belt should be refused **except in very special circumstances**.
2. the enhancement of the Green Belt to provide appropriate multi-functional uses for Londoners should be supported.

B) The ~~extension~~ ***alteration*** *of the Green Belt ~~will be supported where appropriate. Its de-designation will not~~* ***should only occur*** **in** ***exceptional circumstances, through the preparation or review of a Local Plan.***

Lichfields' Commentary

Part A of draft London Plan Policy G2 does not currently provide for instances where inappropriate development in the Green Belt may be justified by very special circumstances. This represents a significant inconsistency against national policy, particularly paragraph 87 of the NPPF. This is despite supporting text at paragraph 8.2.1 of the draft London Plan acknowledging that *"the NPPF provides a clear directionfor the management of development within the Green Belt".*

Part A is also inconsistent with the NPS for National Networks (2014) (which sets out national planning policy for SRFis), which states at paragraph 5.178 that national networks infrastructure projects that comprise inappropriate development in the Green Belt will be assessed

against a requirement to demonstrate 'very special circumstances'.

Paragraph 0.0.20 of the draft London Plan states that deviation from national policy occurs partly where it *"reflects the particular circumstances of London".* Notwithstanding that consistency with national policy is required under the GLA Act 1999, it is considered that the NPPF Green Belt policy (and the Green Belt policy in the NTS for National Networks) are directly relevant to London and its green belt. It is not appropriate or justified to amend this in the draft London Plan, particularly with no evidence provided to justify such a new policy approach.

Furthermore, it is vital that there is policy provision for developments to be brought forward in the Green Belt, where any potential harm is clearly outweighed by other considerations (i.e. very special circumstances). Without this criterion, the policy effectively suggests that harm to the Green Belt cannot be outweighed, and that Green Belt land should not be developed irrespective of the specific circumstances. The Green Belt is not intended to impose a blanket 'ban' on development. Instead it is a stringent policy constraint, which sets a very high bar but nonetheless allows for development to proceed in very special circumstances.

User: Prologis

Green Belt

Prologis supports the protection of the Green Belt, which is afforded the strongest protection in accordance with the NPPF in the Current London Plan. However, Policy G2 *Green Belt* of the Draft London Plan categorically states that the de-designation of the Green Belt will not be supported. This goes against the NPPF, which provides clear guidance on how its boundaries should be altered. Paragraph 83 of the NPPF provides that, once established, Green Belt boundaries should only be altered in exceptional circumstances through the preparation of the Local Plan.

Outer Boroughs have seen a very significant increase in their housing delivery targets with the majority seeing increases of over 100%. The Draft London Plan is relying heavily on the capacity of small sites to deliver this increase in housing. However, the evidence related to the capacity of small sites relies on polices within the Draft London Plan resulting in an increase of around 150%. At the same time the re-categorisation of Boroughs in terms of industrial release means that in most cases they will be unable to allocate industrial land for release, unless alternative sites for designation as industrial land can be found within the borough or in adjoining boroughs. As such it is probable that local assessments of housing capacity carried out through the preparation of Local Plan could identify significant shortfalls in housing supply in the Outer Boroughs.

The ability to carefully consider Green Belt boundaries in the Outer Boroughs will be important if the process of substitution set out in Policy E7 is to be effective at delivering land and industry for premises in the most suitable locations close to the strategic road and/or rail network as well as airports, and away from residential development. This process would then free up existing industrial land in locations that are well connected to public transport and suitable for the delivery of new homes. This would result in sustainable patterns of development that reduce reliance on the private car and improve air quality in residential areas.

Prologis do not expect the Draft London Plan to identify specific areas of Green Belt for release. However, Prologis considers that the Draft London Plan should allow Boroughs flexibility to review Green Belt boundaries, through the preparation or review of the Local Plan process in accordance with the NPPF, if exceptional circumstances exist. As such we suggest the following modification to Policy G2.

A. The Green Belt should be protected from inappropriate development:

1) development proposals that would harm the Green Belt should be refused except in very special circumstances;

2) the enhancement of the Green Belt to provide appropriate multifunctional uses for Londoners should be supported.

B. The extension of the Green Belt will be supported, where appropriate. It’ s de-designation will not. boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.

User: Unknown

GREEN BELT

25. Paragraph 8.2.1 notes that the NPPF (with reference to the section on Green Belt in full) provides a clear direction for the management of development within the Green Belt and sets out the processes and considerations for defining Green Belt boundaries. However, **Policy G2** does not appear to reflect this, offering a strong and clear view that de-designation of Green Belt boundaries will not be supported, in conflict with referenced paragraphs 83-86 of the NPPF. CBRE considers that it is wrong for the DLP to deviate from the NPPF and should instead repeat paragraph 8.3.2 in the DLP that refers to Metropolitan Open Land but with reference to the Green Belt. We do not consider that the London Plan can legally remove the right of London Boroughs to conduct reviews and subsequently amend the boundaries of Green Belts through their local plan review process in accordance with paragraphs 83-86 of the NPPF.

User: Unknown

GREEN BELT

25. Paragraph 8.2.1 notes that the NPPF (with reference to the section on Green Belt in full) provides a clear direction for the management of development within the Green Belt and sets out the processes and considerations for defining Green Belt boundaries. However, **Policy G2** does not appear to reflect this, offering a strong and clear view that de-designation of Green Belt boundaries will not be supported, in conflict with referenced paragraphs 83-86 of the NPPF. CBRE considers that it is wrong for the DLP to deviate from the NPPF and should instead repeat paragraph 8.3.2 in the DLP that refers to Metropolitan Open Land but with reference to the Green Belt. We do not consider that the London Plan can legally remove the right of London Boroughs to conduct reviews and subsequently amend the boundaries of Green Belts through their local plan review process in accordance with paragraphs 83-86 of the NPPF.

User: Unknown

26. CBRE recognises that parts of the Green Belt are of great value and must remain fully protected. However, designated Green Belt land does not imply beauty, public access or biodiversity, which is reasonable, given the fact that Metropolitan Green Belt was established 60 years ago with the purpose of preventing London growing outwards into the countryside and merging with other towns. With the effect of Green Belt policy being urban containment, an implication of this is extended commuting through the Green Belt. It is arguable that a failure to provide for its own growth will contribute to London's development becoming less sustainable.

27. We note that some commentators, such as the London Chamber of Commerce and Industry (LCCI), have questioned whether areas designated as Green Belt currently fulfil their purpose. Whilst the wording of the DLP suggests that the Mayor considers this remains the case, in the absence of any evidence, such as a London-wide Green Belt Study, it is difficult to know for sure, whilst this lack of evidence fails to substantiate a deviation from national guidance.

28. The LCCI published a report in December 2017 entitled "Brown for Blue – Land to house London's emergency workers." The report sought to identify 'brownspace' land within London's Green Belt, which is defined by the LCCI as being disused or has a poor quality land use and includes quarries amongst other land uses. The conclusion of the report revealed that there is the capacity to build up to 20,000 new homes on such land. Whilst the intention of the report is to assist with addressing the fact that 54% of London's emergency workers live outside of London, in more general terms, it helpfully highlights the fact that there are merits in limited intervention of the Capital's Green Belt land in order to provide much needed housing.

29. Page 10 of the LCCI report states that three former quarry/landfill sites in Havering at 13, 17 and 52 hectares in size have been identified. These three 'brownfield' sites have all previously been identified as such in the National Land Use Database. In addition, page 9 of the LCCI report identifies a further 37-hectare former landfill site in the Green Belt as being 'brownspace – poor land use'. These are four significant parcels of inferior quality, inaccessible and/or contaminated land that could assist in making a key contribution to meeting housing need within this Borough. Crudely, 121 hectares in total could deliver up to 5,500 new homes at an average modest density of 55 dwellings per hectare and still provide for around 20% open space.

30. This 37 hectare parcel of land in Havering referred to above, known as Mardyke Farm, was previously proposed to be removed from the Green Belt as part of that Borough's previous local plan review. At that time, a new housing-led development involving a total of 1,500 units were considered, together with improvements to public transport, shops, services and community facilities. The proposals were also to feature

“the complete restoration of the remaining landfill site to create a high quality public open space in the Green Belt” according to paragraph 4.95 of the Inspector’s report on the Havering Core Strategy and Development Control Policies DPD 2008. The scale and detail of the proposed development justified exceptional circumstances for its removal, according to the Council. The Inspector’s conclusion on this matter was that removal of this site was not required to meet the housing needs of the authority through the Plan period, hence, the site remained within the Green Belt, despite in all other respects development being considered appropriate. Paragraph 4.97 of the Inspector’s report also confirms the Inspector’s application of PPG2 (Green Belts) which advised that detailed boundaries should not be altered or development allowed merely because the land has become derelict. The NPPF, which replaced PPG2, makes no reference to whether land is or is not derelict when identifying Green Belt boundaries.

31. It is therefore evident that matters relating to national Green Belt legislation and local/London housing need have changed significantly since 2008. The DLP proposes a significant increase in the Havering’s housing need compared with 2008 and, as confirmed in Havering’s Proposed Submission, the Borough does not currently have a 5YHLS. As such, it would be entirely reasonable to revisit the Inspector’s previous decision to not remove this site from the Green Belt.

32. CBRE does not consider it reasonable to expect local planning authorities beyond London with Green Belt land to have to review such boundaries to accommodate either their own or London’s growth when London Boroughs can seemingly opt out of such a requirement given the wording of policy G2 in the DLP. Such an approach will introduce a nationwide inconsistency.

33. Given the intended uplift in annual housebuilding from 49,000 in the adopted London Plan to 66,000 in the DLP (an increase by more than a third), we consider the need to review London’s Green Belt is greater than ever before. CBRE considers that a positive review could lead to the identification of numerous large, deliverable strategic sites within a single ownership that fail to meet their intended Green Belt purposes and could assist with the provision of much needed housing, and other associated uses, in sustainable locations. Such allocations would reduce the DLP’s reliance on the development of more sensitive unallocated small sites, allowing the establishment of new character areas at high densities with minimal amenity impacts on nearby existing residents, policy compliant affordable housing and on-site infrastructure, with any Green Belt revisions being subject to the provision of new clear and defensible Green Belt boundaries.

User: Unknown

35. We consider it reasonable to request a review of the DLP’s unjustified position in relation to Green Belt policy.
With such a significant increase in housing targets, CBRE considers it is also reasonable to take this opportunity, in accordance with paragraph 83 of the NPPF, to conduct a review of Green Belt boundaries
with the intention of identifying such land that no longer fulfils the purpose of being within the Green Belt, which could then become an allocated site to assist with the delivery of homes to meet London’s needs.

User: Airport Industrial Property Unit Trust

Green Belt

We note that the DNLP alms to accommodate all of London's growth within its boundaries without intruding on Its Green Belt or other protected open spaces. Policy G2 states that the extension of the Green Belt will be supported, where appropriate; however, It sets out a blanket presumption against its de-designation.

The DNLP refers to the National Planning Policy Framework ('NPPF') and its guidance in respect of the Green Belt. The NPPF (paragraph 82) confirms that the general extent of Green Belts across the country is already established and that new Green Belts should only be established in exceptional circumstances. Paragraph 79 confirms that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open and that the essential characteristics of Green Belts are their openness and permanence. The NPPF also states (paragraph 83) that once established, Green Belt boundaries should only be altered in exceptional circumstances and that this should be done through the preparation or review of a local plan. As such, the NPPF does not preclude the release of land from the Green Belt.

Although AIPUT acknowledges the need for and importance of the Green Belt In London (in instances where It performs well In terms of checking the unrestricted sprawl of large built-up areas and Its other purposes), we are concerned that Polley G2 as drafted pre-judges the local plan process across the Capital by suggesting that limited Green Belt releases will not be supported,even where there are exceptional circumstances (e.g. development needs that cannot be met by other means) and the land in question no longer fulfils a valid Green Belt purpose or function. With regard to such limited Green Belt release, we are aware of recent Green Belt reviews carried out by borough's as part of their local plan reviews, which conclude that limited areas of Green Belt should be de-designated as a result of exceptional circumstances relating to accommodating development needs, the need for new transport infrastructure and the fact that these areas perform poorly in terms of Green Belt purposes and function.

We therefore consider that Polley G2, rather than placing a blanket presumption against de- designation, should recognise that there may be situations where the limited release of Green Belt land is acceptable (where exceptional circumstances can be demonstrated) and that this should be considered by boroughs through the review of their local plans.

While Green Belt boundaries, in terms of the release of land from the Green Belt, should only be altered in exceptional circumstances, the same principle applies to new Green Belts and the extension of Green Belt boundaries. Again,this should be recognised by Policy G2, along

wah the fact that any extensions should be advanced through local plan reviews.

User: Mr Howard Berlin

2.0 PPG2 / NPPF ASSESSMENT

2.1 It should be noted that the original Green Belt review carried out in 2010 (Stage 3 PPG2 Assessment dated May 2010, (LBR 2.4.1.a) (4.1.1 Page 9) stated that both Hainault Fields (GB13) and Fairlop Plain (GB14) scored 12 points. This is the correct methodology in advising if green belt land should be declassified. It should be noted that nothing has happened in the location to alter the score. Neither has there been any change to this in NPPF Policy. There is no evidence of any material change from Wardell Armstrong (WA) or London Borough of Redbridge It should be further noted that 12 points is the highest score for any Green Belt land in London Borough of Redbridge.

2.2 Fairlop Plain and Hainault Plain are the largest green belt parcels in Redbridge. The Green Belt designation should be viewed as a necessary protection to ensure continuing openness and prevention of urban sprawl.

2.3 Oakfield Playing Fields as part of GB 13 stops the merging of Barkingside and Hainault. Please see LBR 2.41.3 (Addendum Appendix) which is a map of Redbridge and shows the location of Barkingside and Hainault. In response to WA 2.1.7 you will note that WA have grouped Barkingside as one settlement with Ilford, Redbridge, Gants Hill, Clayhall, Grange Hill, Newbury Park, Aldborough Hatch, Seven Kings, Goodmayes, Little Heath, and Chadwell Heath. This is a clear case of lack of understanding of the locality as how is it possible to link Seven Kings with Grange Hill (please see the location map)?

2.4 The Council's own consultants identified that development of Oakfield "would break the current urban edge" back in 2010. Therefore, Oakfield checks unrestricted sprawl all the way east to Hainault Forest Country Park and beyond and assists in safeguarding the countryside from encroachment. Set on the urban edge it assists in regeneration (e.g. Redbridge Sports Centre) as well as preserving the character of Barkingside, Fairlop and Hainault as the gateway to the countryside. A view of a map clearly shows that Oakfield prevents the merging of Hainault with Fullwell Cross and Barkingside beyond.

2.5 An argument for sub division of Oakfield Playing is based on housing in Forest Road and Fencepiece Road and the railway line that marks the border between Oakfield Playing Fields and the adjoining Green Belt land. This is a point raised in WA 3.4.7. By way of rebuttal there have been no “mapping errors” as indicated by WA. The fact is that they (WA) have not been provided of any evidence by Redbridge of the dates of the construction of the housing on Forest Road and Fencepiece Road. Oakfield’s designation goes back to 1938 and all these houses were constructed prior to 1935. In fact, there was some housing pre 20th Century. As for the railway line this was constructed in 1902.

As you can see WA have omitted this relevant evidence because they have neither researched nor have been provided correct evidence by Redbridge. The evidence therefore shows that there have been no changes in the location to demonstrate “exceptional circumstances”.

2.6 It is disappointing to note that bearing in mind the importance of this issue, and that this matter is to be resolved by a Planning Inspector, that no information has ever been provided by Wardell Armstrong into the history of the housing and the railway line in this location.

2.7 There are no circumstances or even exceptional circumstances which prevail to give any basis for Oakfield Playing Fields or any Part of GB 13 to be released from its established green belt status.

2.8 Oakfield Playing Fields meet three criteria. They are:-

1) Urban sprawl;

2) Merging of towns;

3) Safeguarding of countryside. It should be noted that open land sports amenity fits the definition of countryside.

3.0 MAYOR OF LONDON REPRESENTATION

3.1 It should be noted that the London Mayor (Greater London Authority) submission supports the contention that Oakfield Playing should remain as Metropolitan Open Land. It is the London Mayors declared policy not to build homes on the London Green Belt. This Submission is dated 11th Oct 2016.

3.2 This submission is consistent with the conclusion of the London Mayor in that Oakfield Playing Fields Green Belt and Metropolitan Open Space status should remain unchanged.

3.3 The London Assembly Planning Committee has produced a brief which reflects the Assembly’s agreed position on the London Green Belt. This refers to Redbidge and to Oakfield. It is attached as an Appendix.

4.0 LONDON BOROUGH OF REDBRIDGE

4.1 Redbridge Council in response to the campaign group Save Oakfield Site (SOS) Redbridge have been rewriting their evidence base to support their plans to sell the land to a property developer. This includes removing evidence and previous reports produced by the Council

and its consultants (including Wardell Armstrong) that undermines their own case on Oakfield. The latest February 2017 addendum is one of many. As an example, it reduces Oakfield to a single paragraph statement with a very narrow focus.

4.2 WA latest review, together with the previous reviews, are highly questionable and have been written for the sole purpose of finding Green Belt development sites for housing development. A Green Belt review should be independently written with the clear intention of assessing sites in terms of their importance for Green Belt. WA have failed to advise of the importance of Oakfield Playing Fields. Oakfield is part of the Barkingside community. A map of the location shows that Oakfield Playing Fields forms part of the Hainault Field. It is open and hold backs Barkingside merging with Hainault. Oakfield therefore contains urban sprawl.

4.3 Oakfield separates Barkingside from Hainault as per the LBR Local Plan Policy LP34(c).

5.0 SUPPLEMENTARY COMMENT

5.1 We refer you to our own representation and evidence, which includes the Council's current and previous evidence base. We have been consistent throughout and clearly show that Oakfield meets NPPF and PPG2 requirements for Green Belt, locally important open green space, as well as Metropolitan Open Land, and should therefore be protected from development. In addition, there are no exceptional circumstances and no material change since designation. This has enhanced the land for sport and recreation.

5.2 A more detailed critique of earlier Green Belt Reviews was contained in the Save Oakfield Society Representation.

6.0 CONCLUSION

6.1 There is no case for Oakfield Playing Fields to be declassified from its established designated Metropolitan Open Land (London Green Belt) status.

User: Brunel University

1. Policy Comments

Our comments relate to **Policy G2: London's Green Belt**.

Paragraph 151 of the National Planning Policy Framework (NPPF) requires Local Plans to be consistent with the principles and policies set out in the NPPF. Paragraph 182 continues by requiring the plan to be consistent with national policy in order to be considered sound.

Key NPPF provisions relevant to Green Belts are set out at paragraphs 79-92, of which the following are of particular relevance to Policy G2:

- Paragraph 83 allows Green Belt boundaries to be altered in 'Exceptional Circumstances' (EC), through the preparation or review of the Local Plan; and

- Paragraph 87 allows inappropriate development (in the Green Belt) to be approved where 'Very Special Circumstances' (VSC) are demonstrated.

Draft Policy G2 seeks to prevent any inappropriate development in the Green Belt and any alterations to Green Belt boundaries (that involve the removal of land from the Green Belt), without allowing for 'very special' or 'exceptional' circumstances where an exception is necessary to deliver sustainable development. This is **not consistent with national policy** (NPPF paragraphs 83/87).

The policy is **not positively prepared.** It is an established planning principle that there are some circumstances where the removal of land from the Green Belt and inappropriate development on Green Belt land is, in fact, acceptable in planning terms on the grounds that this is sometimes VSC and EC tests which have been a key component of national Green Belt planning policy that has remained unchanged since the publication of PPG2: Green Belts in 1995. This policy position is supported by a considerable amount of case law on the meaning and application of these tests.

It is a recognised planning principle that each case is fact sensitive and subject to local and site specific circumstances, where the question of whether EC or VSC exist requires an exercise of planning judgement by either the Local Planning Authority or a Planning Inspector on a case-by-case basis. It is not necessary for the new London Plan to reach a conclusive view on whether or not such circumstances could exist in London over the plan period, however it is critical that it respects and positively maintains these well-established policy tests that are key to

striking an appropriate balance between the objectives of protecting the Green Belt and the need to deliver sustainable development.

We have reviewed the evidence base underpinning the draft London Plan and have been unable to identify the robust evidence that would be necessary to justify a departure to national policy and the introduction of the more restrictive position proposed by Policy G2. We therefore conclude that the policy is **not justified.**

Finally, the inconsistent, negatively worded, and unjustifiably restrictive position proposed by draft Policy G2 prejudices the ability to deliver other policies in the Plan, including Policy E8 (the development of London's Higher Education sector) and draft Policies S1 and S2 (social infrastructure) (see explanation at Section 2). Accordingly, the policy is **not effective.**

As a consequence of the above, it is our view that draft Policy G2 is clearly **not sound** having regard to the relevant tests.

In order to make the policy sound we recommend the following amendments:

Policy G2 London's Green Belt

A. ~~The Green Belt should be protected from inappropriate development:~~

~~1) development proposals that would harm the Green Belt should be refused~~

1) Inappropriate development is, by definition, harmful to the Green Belt and should be approved only in very special circumstances.

2) The enhancement of the Green Belt to provide appropriate multifunctional uses for Londoners should be supported.

A. The extension of the Green Belt will be supported, where appropriate. Its de-designation will not **be acceptable only in exceptional circumstances through the preparation of review of Local Plans.**

2. Explanation

Ensuring a sound and consistent Green Belt policy basis that continues to maintain allowance for 'very special circumstances' and 'exceptional circumstances' is critical for BUL.

(i) Brunel University London

BUL operates from a 78ha campus located approximately 1km to the south of Uxbridge town centre, within the administrative area of London Borough of Hillingdon (LBH) (refer to site plans at Appendix A of Enclosure 1). It is unique in being the only single-campus based university in London. Existing buildings on the campus extend to approximately 233,851sqm (GIA) comprising a mix of academic and student housing accommodation which has been developed incrementally since the 1960's.

The entire campus is designated as Green Belt.

BUL was established in 1966 and has been subject to continuous growth since. It has 14,150 students (2015/16), employs over 2,500 staff, has an annual income of £200m (2016/17), and contributes an estimated £445m per annum to the UK economy. As such, it is a significant economic asset for London. It is also an important driver of social mobility.

It is recognised as a quality provider of higher education allied to industry with a particular focus on STEM (Science, Technology, Engineering and Maths) subjects, with a strong and growing research function, as reflected in the following rankings:

- Ranked 49th out of 93 UK institutions, and 351-400th out of 1,102 worldwide institutions, in the 2018 Times Higher Education Survey (THES) World University Rankings;

- 1st in London and 8th out of 25 UK Institutions in the 2016 Times Higher Education ranking of the top 150 higher education institutions that are less than 50 years old (80th in the world); and

- In addition, Brunel University has been awarded one of the most prestigious awards – the Queen's Anniversary Prize for Further and Higher Education for its ground-breaking research.

The University wishes to capitalise on its success and is preparing for significant growth, with student numbers planned to increase to 21,500 over the next 5-10 years (potentially up to 25,000) with a focus on growing its research capability and continued focus on STEM subjects. This requires a significant programme of development estimated to comprise:

- 1:1 replacement or refurbishment of 98,000sqm of existing accommodation; and

- 118,000sqm of net additional (new) floorspace.

(ii) Hillingdon Local Plan (Exceptional Circumstances)

BUL has been working collaboratively with LBH (as Local Planning Authority) since 2014 in respect to its emerging Local Plan, with the aim of establishing an appropriate policy position to support its growth plans.

These collaborative discussions were extended to include the Hillingdon Hospitals NHS Foundation Trust (HHNHSFT) and Central North West London NHS foundation Trust CNWLNHSFT (the 'Trusts') in 2015. The HHNHSFT is the main provider of NHS hospital services in LBH, with the existing Hillingdon Hospital being its main facility. The CNWLNHSFT is the main provider of NHS mental health services in LBH and currently operates from a number of separate facilities spread across the borough (including at the Hillingdon Hospital site).

Hillingdon Hospital is located on Pield Heath Road (approximately 200m south east of BUL's Uxbridge campus) and was built mainly in the period 1963-67. The accommodation has reached the end of its economic life and is now sub-optimal having regard to modern healthcare operational requirements. The existing buildings are not suitable for refurbishment therefore a new-build solution is needed in order to satisfy existing and future healthcare needs.

The University and the Trusts are seeking to develop an integrated higher education and healthcare campus on Site 4 of BUL's Uxbridge campus, which would include a new hospital, associated healthcare facilities, and a medical school alongside new academic and student residential accommodation for the University elsewhere on Sites 1-7 (refer to Concept Masterplan at Appendix D of Enclosure 1). This provides an opportunity to meet significant education and healthcare needs, and realise unique complementary benefits associated with colocation particularly those associated with the education of healthcare professionals and healthcare related research.

The ambition of the institutions is significant. The proposed education/healthcare facility is intended to be transformative and of genuine international calibre in terms of its education, research, and healthcare services.

The new healthcare facilities would replace the existing Hillingdon Hospital on Pield Heath Road. At this point in time it is anticipated that this site will be surplus to the Trusts' needs either in part or full

following the completion of new facilities, which will free up the site for redevelopment. It is our view that the site is suitable for residential and/or healthcare development, which would contribute towards meeting London's pressing housing needs. The Trusts are dependent on

securing a substantive receipt from the disposal of this site (or a long term income stream if it is retained) in order to contribute to the funding of the proposed new healthcare facilities.

In order to mitigate the risk of the University and Trusts' growth plans, it is essential that a site specific policy position is established in the Local Plan that supports the principle of development at the Uxbridge campus and existing hospital site. The Local Plan policy position being sought comprises the following:

- The allocation of BUL's Uxbridge campus (Sites 1-7) for higher education/research and healthcare uses;

- A Green Belt boundary review that removes the Green Belt designation from Sites 1, 2, 3 (northern part), 4, 6 and 7 of the University's Uxbridge campus; and

- The allocation of the existing Hillingdon Hospital site for residential and/or healthcare uses.

This policy position is underpinned by an Exceptional Circumstances case to justify a revision to the Green Belt, based upon the following grounds:

1. The delivery of significant public benefits associated with satisfying the following needs: o There is a significant economic (education) and social need for the expansion of the University. This is a location specific need that can only be satisfied on the BUL Uxbridge Campus;

o There is a significant social (healthcare) need for the Trusts to provide new healthcare facilities. This is a location specific need that can only be met in the local area with significant benefits of co-locating with an expanded BUL;

o There is an environmental need to remediate Site 4 (of the University's Uxbridge Campus);

o There is a broader strategic need to increase the supply of land for housing; and

2. The above benefits can be realised with limited harm to the Green Belt and there are no other development management policies that suggest that development should be restricted.

This case is explained and fully justified in the representations that have been submitted jointly by BUL and the Trusts to LBH in respect to the emerging Local Plan. These representations are enclosed and comprise a cover report which sets out an overview of the case (including the significant public benefits) which is supported by the following appendices:

- Appendix A: Site plans, aerial photograph, and proposed Policies Map;

- Appendix B: Brunel University London Development Need Assessment;

- Appendix C: The Trusts' Development Need Assessment. This comprises

(i) a Statement from HHNHSFT; and

(ii) a separate statement from CNWLNHSFT.

- Appendix D: Brunel University London Site Capacity Assessment and Concept Masterplan;

- Appendix E: Brunel University London Business Case;

- Appendix F: Economic Impact Assessment;

- Appendix G: Green Belt Assessment;

- Appendix H: Transport Feasibility Report;

- Appendix I: Alternative Site Assessment (Brunel University);

- Appendix J: Comparables;

- Appendix K: Historical Land Use Report (Site 4);

- Appendix L: Ecological Appraisal; and

- Appendix M: Site 4 Asbestos Survey.

The University's intention is to prepare/submit a single comprehensive site-wide outline planning application in due course, with development then brought forward in a series of phases.

The University and Trusts' sustainable development objectives are firmly in line with national, local, current London Plan, and draft London Plan Policies regarding higher education and social infrastructure (including draft Policies E8, S1 and S2), and in our view satisfy the exceptional

circumstances required to justify the removal of the site from the Green Belt. New London Plan Policy G2, as currently drafted, would create a policy conflict which would potentially prejudice delivery and therefore put at risk the realisation of the very significant public benefits that the development would otherwise realise. Accordingly, it is important that draft Policy G2 is amended as proposed.

(iii) Current Projects (Very Special Circumstances)

All development that has taken place on the BUL campus to date (in excess of 230,000sqm) has been approved despite the site being designated as Green Belt throughout its history. This has been pursuant to a series of planning permissions dating back to the 1960's.

The majority of development over the past 13 years has taken place pursuant to outline planning consent ref. 532/APP/2002/2237 which allowed the intensification and expansion of the built-up part of Sites 1 and 2 to provide 48,000sqm of new academic floorspace and 69,840sqm of new student residential accommodation. More recently, planning permission has been granted for the 'BCast' research facility (ref. 532/APP/2014/30) and 'AMCC2' research facility (ref.532/APP/2015/3350), both of which were referred to GLA and where 'very special circumstances' for inappropriate development in the Green Belt were accepted.

The comprehensive local plan-led approach set out above in (ii) will take time to establish. There are a series of BUL projects that must progress now in order to satisfy urgent current university needs which include the development of a 12,000sqm indoor health/sports facility and associated outdoor sports facilities (the 'Health and Sports Centre') and 7,000sqm of new academic accommodation (the 'Learning and Teaching Centre' ('LTC')). These 'advanced phases' of development are to be progressed as planning applications now, within the comprehensive framework being established by the site-wide masterplan and emerging policy position.

The University is currently engaged with LBH and GLA in pre-application discussions regarding these applications, which are partly justified

by very special circumstances (in accordance with established precedent). Again, these projects constitute sustainable development which is firmly in line with national, local, and current London Plan policies. New London Plan Policy G2, as currently drafted, would create a policy conflict which would potentially prejudice delivery and therefore put at risk the realisation of the public benefits that the developments would otherwise realise. Accordingly, it is important that draft Policy G2 is amended as proposed.

3. Net Steps

We request to be kept informed of progress with the draft Plan. We would welcome the opportunity to participate in the examination in public and request attendance at the hearings relevant to Policy G2.

User: Polly Chivers

I am thankful the open green spaces we currently enjoy in West London but I am writing to respond to the draft London Plan consultation. I am pleased that the draft recognises the importance of green spaces but policies need to be stronger to give them adequate protection, in particular:

- It should not be possible to ‘swap’ designated Metropolitan Open Land.

User: Chessington World of Adventures

London's Green Belt

CWoAR objects to the draft Green Belt policy insofar as it is inconsistent with national planning policy, particularly the omission of the 'very special circumstances' (relating to green belt development) and the 'exceptional circumstances' (relating to green belt boundary alterations) elements. These clauses are long-established and are an important part of planning for Green Belt locations, and must be reflected in the draft London Plan's Green Belt policy. It is also important that green belt development that is considered 'appropriate' in NPPF terms is not unduly restricted beyond the requirements of national policy.

Suggested policy wording

*[strikethrough= suggested omissions, **bold=** suggested additions]*

A) The Green Belt should be protected from inappropriate development:

1 ~~development~~ proposals **for inapporopriate development in** ~~that would harm~~ the Green Belt should be refused **except in very special circumstances.**

2 the enhancement of the Green Belt to provide appropriate multi-functional uses for Londoners should be supported.

*B) The ~~extension~~ **alteration** of Green Belt boundaries ~~will be supported, where appropriate. Its de-designation will not~~ **should only occur in exceptional circumstances, through the preparation or review of a Local Plan.***

Lichfields' Commentary

Both Parts A and B of draft London Plan Policy G2 currently contain significant inconsistencies against national policy. This is despite supporting text at paragraph 8.2.1 of the draft London Plan stating that *"the NPPF provides a clear direction for the management of development within the Green Belt".*

While the first part of draft policy G2(A) refers to protecting green belt from inappropriate development (reflecting the NPPF), part (A)(1) seeks to restrict *"development that would harm the green belt".* Paragraph 89 of the NPPF is clear on what comprises 'inappropriate development', and the draft London Plan should not introduce additional subjectivity. The NPPF is clear that (inter alia) provision for appropriate facilities for outdoor recreation and sport, and limited infilling or the partial or complete redevelopment of previously developed sites, can be 'appropriate' development in the green belt.

As an existing, long-established development that is 'washed-over' by green belt, the CWoAR site comprises *'previously development land'* in the context of Annex 2 of the NPPF. Away from the main developed core of the Resort, it also provides facilities for outdoor recreation (including an existing high-ropes course and a woodland Segway route that benefits from planning permission from RBK).

Accordingly, many of the development elements at CWoAR are not 'inappropriate' development in NPPF policy terms. Other examples include small new rides/ attractions, the re-theming and re-structuring of animal enclosures, and modestly sized new resort buildings. CWoAR relies on having the capacity to renew and refresh elements of its offer on an annual basis, via this type of smaller scale development that are not considered under NPPF paragraph 87. Part (A)(1) of draft policy G2 should therefore reflect the NPPF wording and restrict only 'inappropriate' development.

Notwithstanding the above, it is also vital that there is scope in the draft London Plan for larger development to be brought forward in the Green Belt, where harm is clearly outweighed by other considerations (i.e. very special circumstances). Without this criterion, the policy effectively suggests that harm to the Green Belt caused by inappropriate development cannot be outweighed, and that Green Belt land effectively should not be developed in this manner irrespective of the specific circumstances. The Green Belt is not intended to impose a blanket 'ban' on new development. Instead it is a stringent policy constraint, which sets a very high bar but nonetheless allows for justifiable new development to proceed in very special circumstances.

Draft policy G2(B) seeks to prevent any 'de-designation' of green belt land. It is important however that the ability to amend green belt boundaries through the local plan process is retained, where 'exceptional circumstances' are demonstrated. To be inconsistent with paragraph 83 of the NPPF would effectively render redundant the scope for 'Green Belt review' through the plan-making process. Not only is this approach inconsistent with national policy, it also leads to a lack of certainty for local planning authorities such as RBK which have already commenced a Local Plan / Green Belt review in line with the NPPF and the current London Plan.

User: Chessington World of Adventures

CWoAR considers that elements of the draft London Plan, particularly the policy on Green Belt development, are clearly inconsistent with the requirements of national planning policy. As a long-established and regionally important business situated in the Green Belt, any undue and unjustified constraints on Green Belt policy could have significant repercussions for CWoAR. The Resort depends on the ability to renew and refresh its visitor offer each year, and it could not keep pace with leisure market competitors if London Plan policy restricted this ability beyond the requirements in the NPPF. It is paramount that this is addressed, via changes to draft Policy G2, in the way proposed in this letter.

The policy support in the London Plan for the enhancement and extension of London's visitor attractions is welcomed, although should be strengthened, including where this relates to the role of Opportunity Areas. As a regionally important 'destination' Resort with an integrated accommodation offer, CWoAR wishes to see specific support for visitor accommodation at existing destinations in draft Policy E10, alongside recognition of the role of the leisure and tourism sector in the Kingston OA at draft Policy SD1. CWoAR would welcome further opportunities to engage in the draft London Plan process, including possible involvement in the Examination in Public.

User:	Association of Consultant Architects
In Policy G2 there is a redundant apostrophe referring to the Green Belt and “It’s de-designation….”.	

User: Friends of the elderly

3. Policy G2 London’s Green Belt

3.1. The Green Belt plays an important role in preventing urban sprawl and safeguarding the countryside from encroachment. However, there are parts of the Green Belt that are of poor quality or are not enjoyed or utilised by the public which could be put to use for the benefit of the wider community.

3.2. Friends of the Elderly supports the continued protection of the Green Belt, but considers there should be recognition that sites that have no amenity value or are not being utilised could be developed for the benefit of the local community.

3.3. The land surrounding the Friends of the Elderly accommodation in Coulsdon is situated within the Metropolitan Green Belt. Here is a clear example where un-utilised land could be used to meet the Mayor’s targets and the needs of older persons in the area by providing better facilities and residential, specialist nursing and dementia care for more people.

3.4. The Mayor has recognised the growing need for housing to support the older population and so Friends of the Elderly urges the Mayor to work with boroughs in considering opportunities to release poor quality or un-utilised Green Belt in order to try to meet this need.

3.5. Friends of the Elderly also suggests that Policy G2 is amended to better reflect the NPPF (paragraph 87), as follows:

Policy G2 London’s Green Belt

A - The Green Belt should be protected from inappropriate development:
1) development proposals that would harm the Green Belt should be refused ***except in very special circumstances.***
2) the enhancement of the Green Belt to provide appropriate multifunctional uses for Londoners should be supported.

B - The extension of the Green Belt will be supported, ~~where appropriate~~ ***in exceptional circumstances****. It’ s de-designation will not be supported other than in very exceptional circumstances.*

User:	Abigail Woodman

The protections afforded to Green Belt and Metropolitan Open Land must be stronger. The new London Plan must make an unequivocal commitment to protecting them; they should be protected, not from inappropriate development but from development period.

User:	Mrs Alona Sheridan

I welcome Policy G2 and particularly the proposal in Policy G2B that ‘de-designation’ of Green Belt will not be supported. This policy needs to be reinforced for it to be effective. **Proposed change:** A presumption against the alteration of Green Belt boundaries which reduce its extent should be included in policy G2B so that it reads: **‘The extension of the Green Belt will be supported and its de-designation will not. We will enforce a presumption against the loss of Green Belt’.**

User:	Blanche Cameron
Protecting the Green Belt requires stronger enforcement.	

User:	Blanche Cameron

I welcome Policy G2 and particularly the proposal in Policy G2B that ‘de-designation’ of Green Belt will not be supported. This policy needs to be reinforced for it to be effective. **Proposed change:** A presumption against the alteration of Green Belt boundaries which reduce its extent should be included in policy G2B so that it reads: **‘The extension of the Green Belt will be supported and its de-designation will not. We will enforce a presumption against the loss of Green Belt’.**

User:	Denis J Vickers - Consultant Ecologist

Protecting the Green Belt requires stronger enforcement – land in this category is under great threat with significant development taking place (or has already taken place) in all relevant boroughs.

User:	Carshalton-on-the-Hill Residents' Association

Policy G2

We welcome the support for the Green Belt. We ask that Para G2B be strengthened to read ‘**The extension of the Green Belt will be supported and its de-designation will not. We will enforce a presumption against the loss of Green Belt’.**

User:	Mr Peter Shrubb

Backing down on protection for the Green Belt is unacceptable. On the contrary, its protection requires stronger enforcement.

User:	Federation of Enfield Residents & Allied Associations

The Green Belt is more than a bulwark to indiscriminate development; present proposals in Enfield seek to degrade and reclassify certain parts of the GB but are being pursued disingenuously and likely at the behest of developers. We insist the original aim of the GB, to inhibit absolutely ribbon and urban sprawl, are not put aside for cosmetic excuses over "quality of land." We reject this argument and subversion of the 1947 Act by salami-slicing tactics. We have no faith in "swap outs" and see this process as another means of evading the Act. We also reject models avowing transfer of gain from released GB to reinforce other GB sites – this is neither practical nor genuine in Enfield which has a poor history of investing S106 monies for their originally designated infrastructure purposes. Degrading the GB in preparation for development is unacceptable, and absolutely not necessary given the known stock of brownfield land in Enfield. The original GB was not set up in error; it must be retained as such.

User: MS Alison Holtorp

I note that there is the intention to preserve the Green Belt but am concerned that all the new housing will require hospitals, schools and sports space which I understand can be exempted as ‘special circumstances’. My concern is that should history repeat itself and, as happened in the past, when the birth rate dropped, a local school was closed and houses were built on the site. Later a new school had to be built on a green recreational space. So, if a school is allowed on current Green Belt then, should it no longer be required, the site should be returned to Green Belt otherwise this is the thin edge of the wedge to the loss of Green Belt.

I am also concerned that using small spaces to infil with housing may unwittingly cause a loss of green corridors.

User:	Federation of Enfield Residents & Allied Associations

The Green Belt is more than a bulwark to indiscriminate development; present proposals in Enfield seek to degrade and reclassify certain parts of the GB but are being pursued disingenuously and likely at the behest of developers. We insist the original aim of the GB, to inhibit absolutely ribbon and urban sprawl, are not put aside for cosmetic excuses over "quality of land." We reject this argument and subversion of the 1947 Act by salami-slicing tactics. We have no faith in "swap outs" and see this process as another means of evading the Act. We also reject models avowing transfer of gain from released GB to reinforce other GB sites – this is neither practical nor genuine in Enfield which has a poor history of investing S106 monies for their originally designated infrastructure purposes. Degrading the GB in preparation for development is unacceptable, and absolutely not necessary given the known stock of brownfield land in Enfield. The original GB was not set up in error; it must be retained as such.

User: HGH

Policy G2 London's Green Belt

Draft Policy G2 reiterates the importance of the Green Belt and states that it should be protected from inappropriate development. However, it fails to acknowledge that in 'very special circumstances' inappropriate development may be allowed. This is important in the context of the comments above in connection with professional sport. The current London Plan includes such reference in Policy 7.16 B and the New Draft Policy G2 should also be amended to reflect this.

User: Tonbridge and Malling Borough Council

Related to the risk of meeting future housing need is the approach adopted in the draft London Plan towards the use of Green Belt land. In Tonbridge and Malling, which is a borough with over 70% Green Belt designations, the emerging Local Plan is seeking to demonstrate exceptional circumstances to release some Green Belt to meet future needs for housing, employment and much needed infrastructure. In order to meet future needs where they arise and to explore sustainable patterns of development in accordance with the NPPF this is an approach that local planning authorities should explore once all other options have been exhausted.

By refusing to apply the same rationale to the inner edge of the Green Belt in Greater London this will have the effect of transposing some of London's unmet need beyond the Green Belt and into the wider south east and beyond, while increasing development pressures and land values within London. It is also inequitable to ask other Green Belt Authorities to consider taking some of London's unmet need, when there is a reluctance to do so closer to home.

Tonbridge and Malling therefore requests that the draft London Plan be amended to allow for a review of the Green Belt within Greater London as a precursor to working with willing partners in order to plan for future unmet housing need.

User:	South West London Environment Network

We are very concerned to see protection for the existing Green Belt and MOL in all but very exceptional and de minimis situations and are concerned that "land swaps" may result in reprovision of much less suitable areas lacking in the biodiversity of long established open spaces.

User: London national Park City Foundation

London’s Green Belt - Policy G2, Page 303

LNPCF supports Policy G2:

A. The Green Belt should be protected from inappropriate development: 1) development proposals that would harm the Green Belt should be refused 2) the enhancement of the Green Belt to provide appropriate multifunctional uses for Londoners should be supported.

B. The extension of the Green Belt will be supported, where appropriate. It’s *(sic)* de-designation will not.

Supporting text:

8.2.1 The Mayor strongly supports the continued protection of London’s Green Belt. The NPPF provides a clear direction for the management of development within the Green Belt and sets out the processes and considerations for defining Green Belt boundaries. London’s Green Belt makes up 22 per cent of London’s land area and performs multiple beneficial functions for London, such as combating the urban heat island effect, growing food, and providing space for recreation. It also provides the vital function of containing the further expansion of built development. This has helped to drive the re-use and intensification of London’s previously developed brownfield land to ensure London makes efficient use of its land and infrastructure, and that inner urban areas benefit from regeneration and investment.

8.2.2 Openness and permanence are essential characteristics of the Green Belt, but despite being open in character, some parts of the Green Belt do not provide significant benefits to Londoners as they have become derelict and unsightly. This is not, however, an acceptable reason to allow development to take place. These derelict sites may be making positive contributions to biodiversity, flood prevention, and reducing the urban heat island effect. The Mayor will work with boroughs and other strategic partners to enhance access to the Green Belt and to improve the quality of these areas in ways that are appropriate within the Green Belt.

User: Chessington World of Adventures

2 Green Belt policy

The draft London Plan should incorporate (at policy G2) the potential for inappropriate development in the green belt, where this can be justified by very special circumstances, as set out in the NPPF. The new Plan should allow alterations to Green Belt boundaries in exceptional circumstances through the local plan preparation and review process, as detailed by the NPPF. Finally, it should ensure that developments other than those deemed 'inappropriate' in the NPPF are not unduly restricted. This will both ensure consistency with national policy, and allow developments where the benefits clearly outweigh any harm to the Green Belt.

Policy G3 Metropolitan Open Land

User: Mrs Sarah Perry

Strong section and policies laid out are clear and give a positive message in relation to the value of London's green spaces.

In relation to the guidance given about assessing interventions that may enhance MOL, there needs to be advanced, site-specific consideration given to increasing access/leisure facilities on MOL which could impinge heavily on certain MOL's biodiversity and natural signature.

For example, there is a lot of local pressur eon Local Authorities in regards to Beddington Farmlands MOL in the Wandle Valley, in terms of increasing access to all parts of the site once the process of habitat restoration is completed by the current land operator, Viridor. Local Authorities need to be given clear direction when assessing how MOL may be enhanced, as on sensitive sites such as Beddington Farmlands, increased public access across the whole site would significantly disrupt some of the priority listed species found there, specifically the bird colonies.

Policy 8.2.2 of the previous section on Green Belt may be also better referenced in this section, in terms of a major assessment of the benfits of a site in its entirety need to be considered before enahnced/development in any way is undertaken and the Mayor will work with the Boroughs' to do this according to the London Plan guiding principles.

User: Mr Quentin Given

We need tougher action to protect and improve MOL. For example, in Haringey the Hornsey Filter Beds site MOL is under threat. This was once an important habitat feature, its rich invertebrate fauna providing food for many bats and birds. The filter beds have been decommissioned. Instead of proposing to re-create a wetland feature, Haringey in the current draft Wood Green Area Action Plan, is proposing to designate the whole site for dense housing. Not even leaving a percentage for nature. This is how, despite apparent good intentions, wildlife is declining.

User:	Mr Ishwar Chauhan
It is important to maintain a good balance between additional housing and green open spaces for the new and existing homes.	

User: Mrs Marilyn Mason

We agree on the need for and importance of access to MOL, and particularly its contributions to public health, wildlife habitat and biodiversity, the urban landscape, flood mitigation. We have some concerns about what "appropriate development" would entail and would oppose encroachment on these valuable green spaces. We also have concerns about "land swaps" / biodiversity offsets, as wildlife and wildlife corridors are not so easily swapped and changes could result in losses of species. .

User:	Mrs Hilary Pereira

The water space of the Thames already has the attributes of MOL and should be given the added protection from inappropriate development, including encroachment, that would come from designation as MOL

User: Shared Assets

We support London Food Link's response:

Suggested amends:

New sub-paragraph after D2 – ‘It includes significant agricultural or horticultural activity’.

Justification

The criteria for designation of Metropolitan Open Land should include land that has high public value in terms of food production, the level of use, recreation, social enterprise and educational opportunities it provides for Londoners.

User: Goldcrest Land

Amend section D as shown in italics so as to read:

D Boroughs should *undertake a robust review of MOL boundaries and should only* designate MOL by establishing that the land meets *more than* one of the following criteria:

Experience is that not all of the presently defined MOL meets the tests in the current adopted plan and some has been released for housing on appeal for this reason. A robust boundary review is needed to keep only that MOL that truely meets the tests and release that which doesnt for housing.

User:	Sport England

MOL provides important spaces to accommodate facilities for outdoor sport and recreation in London; these facilities help support the health of Londoners by providing opportunities to lead more active lifestyles.

In order to make best use of land and support the health of London's population it is necessary to locate sport and recreation facilities on MOL. It is therefore recommended that the supporting text provides clarity that facilities for sport and recreation are one of the appropriate range of uses of MOL and should be supported.

User:	MR Ian Pirie
Excellent! However, I am not sure that any spaces in Havering are designated MOL - boroughs must be made aware of this policy.	

User:	Dr Robert Gurd

Generally, we support the policy except that we consider A (1) does not fully currently reflect the policy in the NPPF where development on green belt land will only be permitted in "very special circumstances." This needs to be clarified in the policy.

User: Council of British Archaeology

CBA (L) welcomes and supports the historic environment policies in principle , which seem to us to cover most of the issues in planning and archaeology in general terms. we have some specific points to raise which we believe would improve the London Plan.

The plan is predicated on substantial growth. The implication of this rate of growth for archaeology is that mere reliance on NPPF guidance and developer led funding is not going to be enough. There will be a need for more archaeologists/resources to:

- review sites;
- Carry out excavations where necessary;
- Undertake post excavation assessments and reports;
- Publish reports;
- Archival storage of material excavated;
- up date identification of Archaeological Priority Areas to make sure these are accurate (as far as they can be) and based on best evidence of likely finds.

Although the historical and archaeological environment may sit primarily in the chapter dealing with culture, these issues potentially run through all developments and concerns dealt with in other chapters. Ideally, we would like to see a Heritage Strategy for London as a free standing mayoral strategy document.

There is virtually no mention of places of worship as heritage – especially churches – which given the number of historically, architecturally and archeologically significant churches is an unwelcome omission. A separate Heritage Strategy would be unlikely to leave such a gap.

Historical and archaeological matters should be read through to both natural environment policies and to polices covering other features such as canals, whose historic component is an essential part of their character and importance.

This is becausehistoric and archaeological environment is potentially very broad , including such places as ancient woodland, canals, rivers and their riparian areas, commons and parklands, and previously industrial and military sites including for example rapidly disappearing but importantfirst and second world war sites. These areas can easily be ignored or overlooked. This also needs to be reflected in the Green Infrastructure Policy and Environment Strategy **(G3and G7)** and in mineral extraction and burial grounds (S110 and S7)

We have concerns about the archaeology that is not yet known about, the “Tier 4” areas. Tiers 1-3 are defined based on current knowledge, but at what scale of development does a project have to be before the planning authority requires some sort of assessment or evaluation to see if there are previously unknown assets? Policy H2, covering the granting of planning permission in principle for small housing sites could put such archaeology at risk without an appropriate assessment.

In relation to the larger developments represented by Opportunity Areas these should be underpinned with broad archaeological strategies covering such areas (Policy SD1).

User: QPR Football Club

Policy G3 Metropolitan Open Land

The comments for G2 above also apply here and the wording of G3 should also be amended accordingly (see below for reference)

Draft Policy G2 reiterates the importance of the Green Belt and states that it should be protected from inappropriate development. However, it fails to acknowledge that in 'very special circumstances' inappropriate development may be allowed. This is important in the context of the comments above in connection with professional sport. The current London Plan includes such reference in Policy 7.16 B and the New Draft Policy G2 should also be amended to reflect this.

User:	London Food LInk /Sustain
New sub-paragraph after D2 – ‘It includes significant agricultural or horticultural activity’	

User:	London Food LInk /Sustain
Add ‘food growing’ after ‘leisure uses’.	

User:	Crispin Truman

- It should not be possible to ‘swap’ designated Metropolitan Open Land.

User: Polly Chivers

I am thankful the open green spaces we currently enjoy in West London but I am writing to respond to the draft London Plan consultation. I am pleased that the draft recognises the importance of green spaces but policies need to be stronger to give them adequate protection, in particular:

- Protecting the Green Belt requires stronger enforcement.
- **It should not be possible to ‘swap’ designated Metropolitan Open Land.**
- Private and public gardens should be protected alongside other local green and open spaces.
- Policies and funding are needed to improve the quality of green space by reducing noise, light and air pollution, increasing biodiversity, and by giving stronger protection to mature trees and hedgerows.
- Informal and formal outdoor sports facilities, including for ball sports, should be protected and enhanced.
- A more strict approach is needed to reduce reliance on the private car, including reduced parking provision in new developments and promotion of more sustainable transport modes.

Excessive housing densities in new development should be resisted to protect the local character of London’s neighbourhoods

User: Mr Peter Martin

It should be recognised that an excessively high and unrealistic housing target for Outer London will put Metropolitan Open Land at risk

Experience has shown that where there is a shortfall in the housing target Boroughs are vulnerable at appeal to the argument that MOL sites have to be released. The unrealistic targets in Table 4.1 mean that there will be a shortfall occurring in many parts of London at an early stage of the Plan.

User:	Mr Chris Gannaway
Strongly agree with policy	

User:	London Forum of Amenity and Civic Societies

London Forum supports this policy and welcomes the statement in paragraph 8.3.2 that "The principles of national Green Belt policy also apply to MOL."

User: London Assembly Green Party Group

I am concerned about the potential for Metropolitan Open Land (MOL) swaps within policy G3 and supporting text paragraph 8.3.2.

The location of MOL is important, and existing MOL is often located in areas where large areas of green space are very deficient.

Proposed amendments to policy G3

Policy G3 B sould be amended to read:

The extension of MOL designations should be supported where appropriate**, through the Local Plan process.**

Policy G3 C should be deleted along with this sentence in paragraph 8.3.2: “The principle of land swaps could be applied to MOL where the resulting MOL meets at least one of the criteria set out in part D of this policy.”

If not deleted then the policy should specify that any replacement must be of better quality (rather than “equivalent or better”) and with a preference for contiguous not just nearby reprovision.

Policy G3 D (2) should be amended to include **“learning and development”** among the benefits and uses of MOL.

User: Alan Simpson

I welcome recognition that Metropolitan Open Land (MOL) should be protected from inappropriate development but this policy is undermined by Policy G3 C and the provision to allow ‘land swaps’ because MOL is characterised by its 'permanence'. **Proposed changes:** Policy G3 C should be deleted along with the sentence in paragraph 8.3.2 “The principle of land swaps could be applied to MOL where the resulting MOL meets at least one of the criteria set out in part D of this policy”. Policy G3B should be amended to read: **‘The extension of MOL designations should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.’**

User: Adrian Cowie

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User:	Paul Stansfield

I welcome recognition that Metropolitan Open Land (MOL) should be protected from inappropriate development but this policy is undermined by Policy G3 C and the provision to allow ‘land swaps’ because MOL is characterised by its 'permanence'. **Proposed changes:** Policy G3 C should be deleted along with the sentence in paragraph 8.3.2 “The principle of land swaps could be applied to MOL where the resulting MOL meets at least one of the criteria set out in part D of this policy”. Policy G3B should be amended to read: **‘The extension of MOL designations should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.’**

User: Dr Leslie Clark

It's good that Metropolitan Open Land (MOL) would be protected from inappropriate development but this policy is undermined by Policy G3 C and the provision to allow ‘land swaps’ because MOL is characterised by its 'permanence'.

Proposed changes: Policy G3 C should be deleted along with the sentence in paragraph 8.3.2 “The principle of land swaps could be applied to MOL where the resulting MOL meets at least one of the criteria set out in part D of this policy”.

Policy G3B should be amended to read: ‘The extension of MOL designations should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.’

User: Royal Botanic Gardens, Kew

We recommend that the London Plan explicitly states that Metropolitan Open Land should be used in a way which enhances Londoners' engagement with, enjoyment of and access to green spaces.

G3A1

We agree that Metropolitan Open Land (MOL) should be protected from inappropriate development and recommend that any proposed development to MOL should first have the biodiversity net gain principle applied and assessed before being permitted.

While we support the refusal of any development proposals which could harm MOL, we are aware that decisions should be made on a case by case basis. Any development on MOL should enhance the access, enjoyment and engagement of people with the features of the land that led it to be designated as MOL.

User:	Twinn Sustainability Innovation

Note: The continued protection of MOL is strongly supported.

User:	Ms Elizabeth Nuckowska

I do not support land swaps for MOL. MOL are often playing felds or well used open spaces, whivh will be needed as the population grows.

Swopping and destroying wildlife/ nature habitats will do more harm than good. Wildlife species choose habitats carefully and choosing an alternative habitat is unlikely to succeed. Let's work with nature not against.

User: River Thames Society (Teddington to Old Windsor branch)

RIVER THAMES SOCIETY (TEDDINGTON TO OLD WINDSOR BRANCH)

The River Thames Society is a charity of over 50 years standing involved with the protection of all aspects and promotion of the River Thames. It is divided into five regions one of which covers Teddington to Old Windsor. Under the draft London Plan our concern is for the non tidal stretch between Teddington and Hampton.

After careful consideration we submit:-

"That the non tidal Thames between Teddington and Hampton should be designated as Metropolitan Open Land". It does meet the criteria for this classification.

User:	Mr Geoffrey Lean

Policy G3 is generally to be supported, but policy G3C with its provision to allow land swaps gravely undermines it and should be deleted.

User:	Mrs Hilary Gander

I welcome recognition that Metropolitan Open Land (MOL) should be protected from inappropriate development however Policy G3 C should be deleted along with the sentence in paragraph 8.3.2 as iit undermines this commitment,

User:	Mrs Ann Chapman

Generally, we support this aspirational policy except that we consider A (1) does not fully currently reflect the policy in the NPPF where development on green belt land will only be permitted in "very special circumstances."

User:	Putney Society

Policy G3 - Metropolitan Open Land
We strongly support this policy. We are concerned that Wandsworth Borough Council has failed to apply this policy in some instances and are disappointed that the Mayor has not intervened to protect the MOL concerned.

User:	The Open Space Society

Add: Boroughs should investigate how public access on foot, horseback and bicycle can be improved, by encouraging landowners to dedicate new paths and public-access land.

Similarly, the aspirations in para 8.3.3 in relation to enhancing access to MOL should be included in the policy box. The explanation is as for Green Belt

User: Home Builders Federation

The policy is unsound in part because it conflicts with national policy.

In contrast to the policy on the Green Belt the policy for the Metropolitan Open Land (MOL) is better since part C refers to alterations of the MOL boundaries through the Local plan process. MOL is treated as equivalent to the Green Belt. Therefore it must be subject to the same planning disciplines as apply to Green Belt land. Part B should be amended so that extension of the MOL can only be made through a Local Plan:

"B The extension of MOL designations should be supported where appropriate undertaken through the Local Plan process."

Part D should be amended so that the draft London Plan is clear that designation of new MOL should only occur through the Local Plan process:

"D Boroughs should designate MOL through the Local Plan process by…"

User: Camden Conservatives

METROPOLITAN OPEN LAND: POLICY G3

12. Metropolitan Open Land (such as Hampstead Heath) should be given the same level of protection as Green Belt, as it is under the existing London Plan.

13. The policy fails to do this. There are three main areas in which the proposed policy significantly dilutes the protection given to MOL such as Hampstead Heath:

14. First, the policy should make clear that all new development within MOL is in principle inappropriate (unless it falls within the limited exceptions in paragraphs 89 and 90 of the NPPF). The policy, as written, is inconsistent with the protection given in national planning policy to Green Belts. It could enable individual planning applications to achieve planning permission, each acceptable in their own terms (and therefore permitted under Policy G3), but resulting in a death by a thousand cuts to MOL over time through the loss of its openness.

15. Second, the Mayor should make clear that the de-designation of MOL will not be supported (as he has done for Green Belt: see draft Policy G2(B)). The failure to make clear that the London Plan does not support the de-designation of Green Belt would mean that areas such as Hampstead Heath now have less protection than the Green Belt in the new London Plan.

16. Third, the proposal for “land swaps”, enabling land to be taken out of MOL if it is replaced by new land, is fundamentally flawed. The starting point is that MOL has the highest level of protection under national planning policy (commensurate with the Green Belt). Therefore, MOL boundaries should only be altered in exceptional circumstances: see paragraph 83 of the NPPF. Exceptional circumstances must exist both to remove land from MOL and to add land to MOL. Providing alternative MOL land in place of existing MOL is not an exceptional circumstance justifying the removal of existing land; and the fact that the “replacement” MOL would meet one of the four criteria set (e.g. that it is clearly distinguishable from the built up area) is not an exceptional circumstance sufficient to justify adding new land to MOL in its place. This part of the policy is completely inconsistent with paragraph 83 of the NPPF and should be deleted.

17. In any event, even if “land swaps” are acceptable in principle, the policy does not even ensure (i) that the replacement land is of the same quality as the lost MOL land (ii) is adjacent to existing MOL land. It would therefore, for example, enable part of Hampstead Heath to be de-designated, to be replaced by inferior open space some distance from the Heath. It should be deleted for this further reason.

18. For all of these reasons, Policy G3 is unsound.

User:	EngineersHRW

Policy G3 Metropolitan Open Land

Note: The continued protection of MOL is strongly supported.

User:	The Pinner Association
support	

User:	Butterfly Conservation

? We note that protection for MOL has been weakened, with the introduction of the principle of land swaps in para 8.3.2 (though it is not clear exactly what this means).
? Given the pressures on land use in London, we urge that MOL be protected, retained, and that public access is ensured.

User:	Royal Borough of Kensington and Chelsea

8.2 Policy G3 Metropolitan Open Land

It is important to recognise the fact that MOL could also have a flood management function and this should be referred to in the policy.

User: London Borough of Islington

Chapter

Green Infrastructure and the Natural Environment

Draft London Plan Policy

Policy G3 – Metropolitan Open Land (MOL)

Islington Response

We support the policy to protect MOL from inappropriate development, which will help protect Islington’s two designated areas of MOL

User:	Association of Consultancy & Engineering

ACE supports the protection of Metropolitan Open Land (MOL) from inappropriate development. However, this should be considered in the context of placemaking for new developments and any MOL should be protected as a percentage of the overall development rather than specific areas.

User:	Galliard Homes

Policy G3 – Metropolitan Open Land is afforded the same policy treatment as Green Belt, but offers better accommodation of local authority due process, since part C refers to alterations of MOL boundaries. However, it must be subject to the same planning disciplines as Green Belt, and parts B and D should be amended so that any extension to, and designations of, the MOL can only be made through Local Plan preparation:
`B The extension of MOL designations should be undertaken through the Local Plan
process…'
`D Boroughs should designate MOL through the Local Plan process by…'

User:	LFoSR - The London Federation of Sport and Recreation

Policy G3: "Metropolitan Open Land", point C allows for some alteration to MOL boundaries, so the level of protection is not as tight as Green Belt.

Positive protection is there for outdoor sports facilities and playing pitches located on MOL, although there are risks associated with boundary changes. Comments above apply.

User: The Royal Society for the Protection of Birds (RSPB)

We agree with Policy G3 paragraph D 3 that boroughs should designate MOL that (3) contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value and (4) forms part of a strategic corridor, node or a link in the network of green infrastructure. Policy G3 D should also refer to contribution MOL makes to the SINC network and wider ecological corridors.

Paragraph 8.3.2 refers to the loss of MOL, noting that the principle of land swap could apply to MOL where the resulting MOL meets at least one of the criteria set out in part D of policy G3 – it should be made clear either in the policy or supporting text that loss of MOL already providing an ecological network function or supporting the SINC network should not be supported.

Suggested addition to policy G3:
'MOL that contributes to strengthening and extending the SINCs network and provides opportunities for habitat creation should be protected from loss'.

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Suggested addition to policy G3:
'MOL that contributes to strengthening and extending the SINCs network and provides opportunities for habitat creation should be protected from loss'.

User: Simon Saville

Policy G3

Given the pressures on land use in London, I urge that Metropolitan Open Land (MOL) be protected, retained, and that public access is ensured. Therefore, I welcome the recognition that MOL should be protected from inappropriate development, but this is undermined by Policy G3C and the provision for "land swaps". MOL is characterised by its "permanence", so land swaps are inappropriate.

Proposed changes

? Policy G3C should be deleted along with the sentence in paragraph 8.3.2 “The principle of land swaps could be applied to MOL where the resulting MOL meets at least one of the criteria set out in part D of this policy”.

? Policy G3B should be amended to read: **"The extension of MOL designations should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs."**

User:	Brentford Community Council

MOLs in our borough are under threat from development, including social infrastructure development and we anticipate that this threat will become stronger as housing densities rise during the plan period.

We request the Mayor to define “inappropriate development” to include social infrastructure development.

User:	London Tree Officers Association
The LTOA broadly supports this policy	

User:	London Borough of Barnet

We agree with policy stance for protecting Metropolitan Open Land (MOL) from inappropriate development, the criteria for designating MOL, that alterations to MOL boundaries should be undertaken through the Local Plan process and proposals to enhance access to MOL. However, we have reservations about the reference made in supporting text (para 8.3.2) regarding the principle of land swops being applied to areas of MOL where the resulting MOL meets at least one of the policy criteria. This is too simplistic and is in danger of failing to properly understand the rationale for identification of areas of MOL in the first place.

User: Lamont Planning Associates

Para. 8.3.2 and Footnote 104 are misleading. There is no reference in the NPPF to Metropolitan Open Land (MoL).

This paragraph will both misdirect Boroughs when formulating Local Plans and when making planning decisions.

Because the NPPF does not apply to MoL, the NPPF test of ‘very special circumstances’ cannot be applied when decision making.

When plan making the Draft London Plan sets out the purposes of MoL in policy G3 D. These four criteria are different from the five purposes of the Green belt set out in para 80 of the NPPF. This underlines that MoL is not Green Belt nor is it a surrogate green belt

Para 8.3.2 and footnote 104 should be deleted from the plan.

Please accept my objection and I will appear at the Examination in Public if required.

User:	Amy Luff
•	It should not be possible to ‘swap’ designated Metropolitan Open Land.

User: Thames Water

Taking into consideration that many of our infrastructure sites are also located in areas of MOL, for example, the remaining area of undeveloped land within Beckton Sewage Treatment Works.

Policy G3 should be amended to include:

‘Some of London’s utility infrastructure, such as reservoirs and treatment plants are also designated as MOL and will require upgrading to meet the requirements of population growth, climate change and environmental regulations.’

We have promoted the removal of the MOL designation at Beckton STW, but to date LB Newham have refused to do this on the basis that it is a GLA/Mayoral decision. We therefore support the clarification in Policy G3 Part C that: “Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoin boroughs”.

User:	Ms Elizabeth Beckman

This applies to Hampstead Heath. It enables the boundaries of Metropolitan Open Land to be amended through "land swap" deals. Hampstead Heath is one of the most important areas of open space in London and is a "green lung" at the heart of our community [give personal examples of why Hampstead Heath is so important]. The London Plan should not allow Hampstead Heath's boundaries to be amended.

User: Ms Nicola Clark

* It should not be possible to ‘swap’ designated Metropolitan Open Land.

I welcome recognition that Metropolitan Open Land (MOL) should be protected from inappropriate development but this policy is undermined by Policy G3 C and the provision to allow ‘land swaps’ because MOL is characterised by its 'permanence'.

Proposed changes: Policy G3 C should be deleted along with the sentence in paragraph 8.3.2 “The principle of land swaps could be applied to MOL where the resulting MOL meets at least one of the criteria set out in part D of this policy”.

Policy G3B should be amended to read: ‘The extension of MOL designations should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.’

User:	Ms Ann Turvey

Green spaces/open spaces are very important but strong protections are required. These areas are people’s life lines and bring enjoyment and therefore good health

Don’t allow swapping of MOL

User:	Elena Moynihan

Metropolitan Open Land. Our open spaces are precious and must be protected. This plan weakens this protection and therefore must be opposed

User:	Charlotte Gascoigne

Policy G3 enables the boundaries of Metropolitan Open Land to be amended through “land swap” deals. Hampstead Heath is one of the most important areas of open space in London and is an increasingly overcrowded space as more and more people are squashed into smaller spaces. The London Plan should not allow the boundaries of Hampstead Heath or any other precious green spaces to be altered.

User:	Martin Cartwright

Defining Metropolitan Open Land in the GLA Plan as a matter of strategic importance should not be taken to mean that these open spaces should not be the concern of boroughs like Hillingdon. The GLA Plan makes no mention of the provision for more MOL, let alone any mechanism for ageeing changes and development. It is my view that MOL is only a strategic matter because these spaces may sometimes straddle several boroughs.

User:	Mr Michael Hibbs

Third, Policy G3. This applies to Hampstead Heath. It enables the boundaries of Metropolitan Open Land to be amended through “land swap” deals. Hampstead Heath is one of the most important areas of open space in London and is a “green lung” at the heart of our community [give personal examples of why Hampstead Heath is so important]. The London Plan should not allow Hampstead Heath’s boundaries to be amended.

User: Maryam Alaghband

Third, Policy G3. This applies to Hampstead Heath. It enables the boundaries of Metropolitan Open Land to be amended through “land swap” deals. Hampstead Heath is one of the most important areas of open space in London and is a “green lung” at the heart of our community [give personal examples of why Hampstead Heath is so important]. The London Plan should not allow Hampstead Heath’s boundaries to be amended.

Overall, the London Plan is inconsistent with national planning policy and should therefore not be approved. I do not agree that the scale of the Mayor’s election victory enables him to depart from national policy. Just as important as the Mayor’s mandate is the role that local communities have been given to shape their own communities (for example, through Neighbourhood Plans). This must be respected. Not only this, but the London Plan lasts until 2041, and should not be shaped by the events of one election.

User:	Belsize Residents Association

This relates to Policy G3 and Hampstead Heath. We understand the policy enables the boundaries of Metropolitan Open Land to be amended through “land swap” deals. Hampstead Heath is one of the most important areas of open space in London and is a “green lung” at the heart of our community. The London Plan should not allow Hampstead Heath’s boundaries to be amended.

User:	London Borough of Haringey
The policy is supported	

User:	Lib Dem Candidates for Hampstead Town

Policy G3 : Metropolitan Open Land must be protected from development. Besides Hampstead Heath, Hampstead has many smaller pieces of MOL, which are essential for the beneficial maintenance of Hampstead's housing and spacial mix. The status of MOL must be retained as being equivalent to Green Belt land.

User:	London Borough of Barking & Dagenham

The Council supports policy G3 which protects Metropolitan Open Land from inappropriate development. The Council has recently approved its Open Space Strategy which includes masterplans for a number of its parks including Barking Park, Mayesbrook Park and Parsloes Park which aim to enhance the quality and range of uses within them in recognition of the fact they need to offer a lot more for the borough's diverse community. We look forward to working with the Mayor in realising our exciting plans for the borough's parks. The Plan could usefully include a map of London Metropolitan Open Land and include policies to encourage an even distribution across London given its strategic importance.

User:	London Borough of Lewisham

We recognise the importance of MOL land as being key components of the borough's green infrastructure and support their protection, as advocated in G3.

Questions have been raised where we feel that there may be certain instances where boundary changes to MOL land should be allowed providing there is strategic reasons for doing so. For instance, our plans for Catford Town Centre, which share aspirations with all the other policies in the Plan, need to utilise an area of MOL in the town centre to re-align the A205 and create a better town centre place, with significantly improved public realm, pedestrian and cycle facilities/connections, new homes/jobs and potential new N-S connections to accessible open spaces.

User:	Environment Agency
We support this policy, and the reference at paragraph 8.3.3 to enhanced access to MOL, and its role in habitat creation and flood storage. Natural England’s response also refers.	

User: London Borough of Brent

The Council supports this policy.

In particular, the Council supports the statement in Policy G3A2) that "the quality and range of uses of MOL" should be enhanced. The Council also supports the statement in paragraph 8.33 that "Proposals to enhance access to MOL and to improve poor quality areas such that they provide a wider range of benefits for Londoners will be encouraged. Examples include improved public access for all, inclusive design, recreation facilities, habitat creation, landscaping improvement and flood storage".

User:	London Borough of Bromley

The Council supports the continued protection of Metropolitan Open Land, however has concerns regarding the operation of the land swap arrangements where proposed through planning applications for the development, given the requirement in Policy G3 C that any alterations to the MOL boundary should be undertaken through the Local Plan process.

User:	Orpington Field Club

pleased to see the importance given to MOL particularly D4 the promotion of green corridors vital for biodiversity and enabling people in inner London to access more rural areas.

User: Royal Borough of Kingston

2.1 RBK recognises the significant challenges of meeting London's housing need within an often dense urban form and constrained by the Green Belt. RBK supports good growth, and jointly published Kingston's Direction of Travel with the Mayor. However, the reliance on the small sites approach to, in the case of RBK, double the housing target is flawed and undeliverable, with severe consequences for the borough which will undermine the delivery of growth. The addition of the small sites effectively doubles the borough's housing target, and well above the current average annual delivery by 300%.

2.2 Delivery of new homes through the small sites approach makes up a very large proportion of the new homes targets, particularly in Outer London boroughs. This is a very significant increase on windfall sites, most of which will not deliver affordable housing. The overall strategic approach will impair the borough's ability to secure affordable housing alongside market housing and significantly lower the overall proportion of new homes that come forward in affordable tenures. In Kingston, for example, almost half of the housing target would come from sites that are not delivering affordable housing.

2.3 The number of small sites anticipated represents a 90% increase on current delivery. It is accepted that there may be a latent demand for this type of intensification which is currently hidden due to discouraging local policies. However, evidence from Croydon, which has strong policies and local agencies to promote intensification suggests that the levels of intensification assumed in the London Plan are unrealistic.

2.4 The plan directs significant growth to local town centres and suburbs, which will alter the character of these areas significantly. The small sites approach, which covers approximately 90% of the developable land in Kingston, would drive a significant shift from houses to flats. This is accompanied by strengthened Green Belt and Metropolitan Open Land (MOL) policy protections. Alternative approaches have not been properly considered and there has been no meaningful engagement with local communities at a grassroots level. This includes consideration of whether there are any areas of Metropolitan Open Land or Green Belt across London where development could be realised in a way which minimises harm and at the same time reduces the scale of impact on London's town centres and suburbs. The IIA considers 'options' in a shallow and binary way which does not suggest proper consideration of a *range* of approaches to deliver housing - rather a mechanistic application of the small sites approach to make up the shortfall between the capacity identified through the London Development Database and London's housing need. It is clear that communities place immense value on their Green Belt and Metropolitan Open Land. However, they also value their suburbs, gardens and town centres.

2.5 The small sites approach is premised on good public transport accessibility. However, this suggests a flawed understanding of Outer

London. Appendix 2 shows that in Kingston, much of the areas subject to the small sites presumption have relatively poor public transport accessibility. If retained, the policy should be amended to only include those areas with a PTAL of 3 or more. The criteria for refusal under the presumption is also limited to a very narrow set of criteria, but excludes design quality, overshadowing, access to outdoor amenity space, noise, energy efficiency, internal layout and space standards and transport issues. It is considered that the exclusion of significant sections of the London Plan and local plans is unacceptable and exceeds the legislative powers of a Spatial Development Strategy. Moreover, it would result in poor quality accommodation, giving rise to detrimental health and well-being outcomes and the erosion of the quality of neighbourhoods. It is entirely unacceptable to suggest that a poor development would not be able to be refused on grounds of poor design. It is also noted that flat conversions are often the least satisfactory type of home in terms of the quality of the living accommodation, and such developments should therefore be subject to more rigorous assessment, rather than less.

2.6 Rather than make housing available, this approach may in reality drive up house prices as the market value of a family home is re-assessed as the value of a development site with multiple housing units. There does not appear to include any assessment of the impact this approach may have on the affordability of family housing in the Integrated Impact Assessment.

2.7 The outcome of undeliverable housing targets is that boroughs will fail to deliver the required numbers of homes, as assessed through the Housing Delivery Test, and fail to adopt new local plans to plan for growth due to the soundness test of ‘deliverability’. This will be exacerbated by the significant windfall reliance, sites which are unlikely to contribute to the 5 - 15 year housing land supply. Both of these outcomes will diminish local authorities’ ability to deliver good growth (through the ‘tilted balance’ set out in the NPPF and the lack of up to date policies), enabling poorer developments to proceed, and further eroding public confidence in the planning system to deliver good growth. These outcomes are the antithesis of what the new London Plan should, and needs to, deliver. RBK is also concerned that, depending on the outcome of national changes, these targets could impact on local authority finance in relation to the New Homes Bonus and planning fee increase, further reducing the availability of funding to deliver planning services. It is currently unclear whether or not this income will be linked to a local authorities’ housing target, or different measures.

User:	London Borough of Tower Hamlets

The policy is supported, however further clarification is required for Part D4 which is currently very confusedly worded – it doesn’t add anything to the policy and could be added to the supporting text.

User: Royal Borough of Kingston

5.0 Protection of the Green Belt and Metropolitan Open Land (MOL)

5.1 The new plan designates a ‘nascent’ Opportunity Area for Kingston to bring forward 9,000 homes and 5,000 jobs over the next 15+ years. The text for this Opportunity Area is inconsistent with the stronger Green Belt and MOL protections as it identifies Chessington and the Hogsmill as areas where there *“may be potential to accommodate growth… in line with the opening of Crossrail 2 in 2033”* . These are areas with significant Green Belt and MOL designations which is inconsistent with accommodating growth as per London Plan policy.

5.2 The Green Belt policy is inconsistent with national policy as it is more restrictive. It does not allow any de-designation of Green Belt through a local plan, whereas national policy allows for de-designation in exceptional circumstances. Similarly it requires development that causes harm to be refused, whereas national policy allows such development to be approved in very special circumstances when the harm is clearly outweighed by the benefits.

5.3 The policy on Metropolitan Open Land (MOL) has different criteria than the policy on Green Belt in relation to alterations to the boundary through the local plan process. There is ambiguity regarding the reference to applying “the principles of” national Green Belt policy in the supporting text, because the MOL policy does not allow planning permissions which harm the MOL to be granted in very special circumstances which national Green Belt policy does.

5.4 RBK considers these policies to be internally inconsistent and, in the case of Green Belt, inconsistent with national policy.

User: Save Swiss Cottage

METROPOLITAN OPEN LAND: POLICY G3

Metropolitan Open Land (such as Hampstead Heath) should be given the same level of protection as Green Belt, as it is under the existing London Plan. The policy fails to do this. There are three main areas in which the proposed policy significantly dilutes the protection given to MOL such as Hampstead Heath:

First, the policy should make clear that all new development within MOL is in principle inappropriate (unless it falls within the limited exceptions in paragraphs 89 and 90 of the NPPF). The policy, as written, is inconsistent with the protection given in national planning policy to Green Belts. It could enable individual planning applications to achieve planning permission, each acceptable in their own terms (and therefore permitted under Policy G3), but resulting in a death by a thousand cuts to MOL over time through the loss of its openness.

Second, the Mayor should make clear that the de-designation of MOL will not be supported (as he has done for Green Belt: see draft Policy G2(B)). The failure to make clear that the London Plan does not support the de-designation of Green Belt would mean that areas such as Hampstead Heath now have less protection than the Green Belt in the new London Plan.

Third, the proposal for “land swaps”, enabling land to be taken out of MOL if it is replaced by new land, is fundamentally flawed. The starting point is that MOL has the highest level of protection under national planning policy (commensurate with the Green Belt). Therefore, MOL boundaries should only be altered in exceptional circumstances: see paragraph 83 of the NPPF. Exceptional circumstances must exist both to remove land from MOL and to add land to MOL. Providing alternative MOL land in place of existing MOL is not an exceptional circumstance justifying the removal of existing land; and the fact that the “replacement” MOL would meet one of the four criteria set (e.g. that it is clearly distinguishable from the built up area) is not an exceptional circumstance sufficient to justify adding new land to MOL in its place. This part of the policy is completely inconsistent with paragraph 83 of the NPPF and should be deleted. In any event, even if “land swaps” are acceptable in principle, the policy does not even ensure (i) that the replacement land is of the same quality as the lost MOL land (ii) is adjacent to existing MOL land. It would therefore, for example, enable part of Hampstead
Heath to be de-designated, to be replaced by inferior open space some distance from the Heath. It should be deleted for this further reason.

For all of these reasons, Policy G3 is unsound.

User: Royal Borough of Kingston

The proposed policy G2 is inconsistent with national policy as set out in paras 79-92 of the NPPF.

The inconsistency results from the binary approach to the determination of applications in the Green Belt - a scheme that causes any harm in the Green Belt must be refused. This is inconsistent with national policy which allows developments to cause Green Belt harm in very special circumstances when the harm (Green Belt and/or otherwise) is clearly outweighed by the benefits of a scheme.

Ambiguity is created by support for “appropriate multi-functional uses”, which is a reference to national policy which recognises that Green Belt should be enhanced through beneficial uses. However, the ambiguity arises as uses which enhance the Green Belt in terms of some of its purposes may still cause harm as measured against other Green Belt purposes. Conflict is very likely to arise between the different elements: it is evidently possible that a proposal for multi-functional uses could cause Green Belt harm. For example, enhancing the use of Green Belt by providing greater access or facilities for outdoor recreation may harm biodiversity, for example. The flexibility of national policy allows the relative harm to be weighed against benefits to provide the outcome which optimises the enhancement of the Green Belt overall: but the removal of this flexibility from the proposed London Plan policy does not allow such balancing to take place.

Further, it is noted that the supporting text refers to some of the useful functions that exist within the Green Belt, which does not reflect the role of the Green Belt, which is not designated for such useful functions.

A similar conflict exists with this policy in relation to de-designation of Green Belt land, which the policy is clear would not be supported by the Mayor. However, national policy allows this in exceptional circumstances, through the preparation of a Local Plan. Again, this creates an unacceptable inconsistency between national policy and the proposed London Plan. It is noted that failing to allow for appropriate Green Belt review and, in exceptional circumstances, its release through the Local Plan process, removes one option which communities may want to explore as an alternative to very large-scale growth in urban and suburban areas which will otherwise be necessary.

Policy G3 MOL gives rise to similar issues. The current London Plan policy clearly applies national Green Belt policy to MOL, as reflected in the Court of Appeal decision *Lensbury Ltd v Richmond-upon-Thames* . This makes it very clear that MOL should be afforded the same weight as Green Belt and that national policies on Green Belt should be applied to this designation. The proposed MOL policy relegates this to supporting text, introduces significant ambiguity by not fully applying national Green Belt policy tests but rather the “principles”, and creates an internally inconsistent relationship with the main body of the policy. This is likely to reduce the protection afforded by the policy and requires

clarification.

As with Green Belt, MOL policy states that harm to the MOL would result in refusal. This is inconsistent with the requirements of national policy on Green Belt (the ‘principles’ of which will be applied) which allow for very special circumstances and a planning balance of a proposal.

The same inconsistency relating to enhancing MOL also arises due to the lack of flexibility regarding development in MOL which may cause harm may conflict with enhancements (which could have significant benefits for some MOL purposes but result in harm against other purposes).

RBK requests that these policies are comprehensively reviewed to create a clear, useable framework for determining planning applications and developing local plans, consistent with national policy. Where the Mayor considers the approach to be different to, but not inconsistent with, national policy, this should be explained, together with the appropriate approach where conflicts arise. Given significance of these concerns and the degree of change necessary to resolve the issues set out, RBK reserves the right to raise additional matters in relation to the redrafted policy as it is considered necessary for the policy to be substantially altered in meaning and application.

Further ambiguity arises when policies G2 and G3 are considered in the context of the ‘nascent’ Kingston Opportunity Area where, in paragraph 2.1.14 it is stated that after the opening of CR2 “ *there may be potential to accommodate growth in... Berrylands and Hogsmill Valley [and] Chessington.* ” Given the extensive Green Belt and MOL designations in these areas, this appears to suggest that this growth would, at least in part, be accommodated in MOL and/or Green Belt. It is accepted that the OA is subject to a much longer timescale than the London Plan, and particularly than the housing target which is only 10 years. However, this gives rise to internal inconsistency within the document. RBK would be prohibited from reviewing its Green Belt and MOL designations through its local plan process (policies G2 and G3) while simultaneously being required to do so in order to have an appropriate policy framework in place to deliver the OA over the next 15+ years.

User:	London Borough of Waltham Forest

We welcome the understanding that release of MOL may be appropriate but only as part of a plan led process. MOL is supposed to be treated the same as Green Belt. We therefore consider that policy G2 should be bought into line with policy G3.

User: London Borough of Hillingdon

Policies G3 and G4 contain no strategic aspirations for the increase and provision of metropolitan open land (MOL). By its definition, MOL is a matter of strategic importance and this is reflected in the text. Any changes to its boundary should be presented by the Mayor, either through a separate strategy or as part of the London Plan. However, criteria D of policy G3 sets the criteria for which the boroughs are expected to designate MOL.

Policy G4 then sets the criteria for boroughs to consider 'local green and open space'. The Council is concerned that the draft plan does not take responsibility for the strategic matters and is effectively making all open space matters a local issue, despite acknowledging MOL is clearly a strategic matter.

Taking account of the above comments, policy G3 should be revised to clearly detail what the GLA will do to designate and safeguard MOL and how boroughs can support that process. In addition, reference should be made to the protection of Green Chains, which provide a natural resource across London.

User:	Swale Borough Council

Whilst we note that the concept of Metropolitan Open Land has been established in previous London plans and some of it has significant environmental and or heritage value, we would query what basis there is to afford it similar policy protection as MGB.

All of the issues raised for Policy G2 apply with such a prescriptive approach.

User:	London Borough of Hackney
Hackney supports the continued protection of MOL.	

User:	Ms R Farooq

It should not be possible to ‘swap’ designated Metropolitan Open Land.

User:	Harlow Council

London’s Green Belt (G2 and G3)

Harlow Council also acknowledges the desire to protect London’s Green Belt and Metropolitan Open Land in accordance with the NPPF. However, in light of high housing and employment targets a more open discussion around the Green Belt and greater flexibility to adopt tailored approaches where locations are of poor quality, have low environmental importance and are not accessible for leisure use should be discussed.

User:	London Borough of Hounslow
LB Hounslow supports this policy G3 and believes that additional reference should be made to education opportunities afforded by this space.	

User: Hampstead Neighbourhood Forum

Metropolitan Open Land: Policy G3

Much of the Forum area consists of Metropolitan Open Land (Hampstead Heath). We are concerned that G3 would lessen the protection of MOL. All new development within MOL, with few exceptions, is inappropriate. MOL under national planning policy should be given the highest level of protection and boundaries altered only in exceptional circumstances as outlined in paragraph 83 of the NPPF.

User:	London Borough of Southwark

Paragraph 8.3.2 makes a reference to land swaps. Elsewhere in the plan land use swaps are suggested for developers to meet their obligations off-site. In this case that would be inconsistent with policy G3 which seeks to prevent harm to MOL and for any alterations of MOL to be made through the Local Plan process. The mention of land swaps in the supporting text is therefore unclear. The council recommends the Mayor to clarify what is meant by ‘land swaps’ in the context of this policy.

User:	London Borough of Richmond Upon Thames

The Council welcomes the protection of MOL. However, we would not support the principle of land swaps as this may weaken the policy. Designated MOL should meet the criteria and protect strategically important open spaces.

User:	London Borough of Harrow
The policy is supported.	

User:	Royal Borough of Greenwich

There is lack of clarity regarding the principle of land swaps. As worded, it implies that applying an MOL designation to an existing green space would be sufficient. This would lead to an overall loss of green space

User:	Greenspace Information for Greater London CIC (GiGL)

GiGL response: high quality data identifying where green belt and metropolitan open land is should also be generated and centralised to enable informed decision-making.

User:	Jenny Fisher
It should not be possible to ‘swap’ designated Metropolitan Open Land.	

User:	The Wimbledon Society

As mentioned above, the draft Plan contains a multitude of considerations for boroughs to take into account, but it provides little help to the boroughs, in particular funding to retain or improve heritage, culture or open space, such as Metropolitan Open Land. We would argue for a London-wide Heritage Grant scheme for small scale basic repairs to Heritage Assets.

User: Mr Joe Ward

We welcome recognition that MOL should be protected from inappropriate development but this policy is undermined by Policy G3 C and the provision to allow ‘land swaps’.

Proposed changes: Policy G3 C should be deleted along with the sentence in paragraph 8.3.2 “The principle of land swaps could be applied to MOL where the resulting MOL meets at least one of the criteria set out in part D of this policy”. Policy G3B should be amended to read: **‘The extension of MOL designations should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.’**

Rationale: The protection of MOL should be supported unequivocally to help realise the Mayor’s ambition to increase green space. ‘Land swaps’ undermine this because:

· The unique location and qualities of MOL are irreplaceable.

· They undermine the ‘essential characteristic’ of permanence, as set out in paragraphs 79-92 of the National Planning Policy Framework (NPPF), which as stated in paragraph 8.3.2, applies to MOL as it does to Green Belt.

· The proposed policy states the MOL resulting from a swap should meet ‘at least one of the criteria set out in Part D’, which could easily be read as ‘only one of the criteria’. This means the resulting MOL is highly likely to be qualitatively considerably less valuable.

· The principle of land swaps creates a loophole that will be exploited by developers and others in ways that reduce the contribution of MOL to quality of life in London.

The open nature and environmental qualities of MOL are constantly being eroded by damaging proposals for inappropriate development. Strong policies are required to halt such speculation and opportunism, rather than policies which suggest that it is acceptable to build on this land even if lesser quality MOL is created an unspecified distance away.

User:	The Wimbledon Society
G3: The Plan should emphasise that MOL has the same status as Green Belt	

User: (FOE) Friends of the Earth England Wales and Northern Ireland

We welcome this policy, in particular criterion A) that Metropolitan Open Land (MOL) should be protected from inappropriate development: 1) development proposals that would harm MOL should be refused, 2) that boroughs should work with partners to enhance the quality and range of uses of MOL and B) The extension of MOL designations should be supported where appropriate.

We are concerned by the reference to land swaps set out in paragraph 8.3.2. This could result in land being substituted of a lesser quality; undermine the permanent, open nature of Metropolitan Open Land (as set out in the NPPF); and create a loophole to be exploited by developers.

In order to achieve the target of making London 50 per cent green, and for the wider benefits these bring, not least to quality of life in London, we consider the Plan should set out a clear presumption against the loss of Metropolitan Open Land and Green Belt.

User:	(FOE) Friends of the Earth England Wales and Northern Ireland

We are concerned by the reference to land swaps set out in paragraph 8.3.2. This could result in land being substituted of a lesser quality; undermine the permanent, open nature of Metropolitan Open Land (as set out in the NPPF); and create a loophole to be exploited by developers.

User:	London Borough of Enfield

Policy G3 looks at ‘Metropolitan Open Land’. It should state that the principles of national Green Belt policy also apply to MOL and that flood storage should be added as a criteria. It should also state land swaps involving MOL would only be appropriate where the result would not lead to a deficiency in access to public open space.

User: London First

Green Belt and Metropolitan Open Land
It is unrealistic to think that current land supply is sufficient to meet the capital's housing target; the London Plan should not, therefore, rule out reviewing London's Green Belt. The Mayor should work with the boroughs to review their Green Belt and to consider how the land within it that is close to existing or future transport nodes and that is of poor environmental or civic value could better serve London's needs by supporting sustainable, high-quality, well-designed residential development that incorporates truly accessible green space.

Where boroughs wish to review their Green Belt boundaries and may wish to de-designate Green Belt and designate it for an alternative use, they should be allowed to do so. They will be subject to the statutory requirements to provide a robust evidence base and justify any changes to Green Belt policy through the local plan examination process. Borough-led Green Belt reviews may enable industrial land in highly accessible locations to be relocated to locations with good connections to the arterial road network. This may release industrial capacity in locations served by existing or planned transport, such as CR2 or the Bakerloo Line Extension for high- density housing and mixed-use development.

Policy G3 on MOL should be amended. It currently reads:
A Metropolitan Open Land (MOL) should be protected from inappropriate development:
1) development proposals that would harm MOL should be refused

It should be amended to read:
A Metropolitan Open Land (MOL) should be protected from inappropriate development:
1) development proposals that would harm MOL should be refused ***other than in exceptional circumstances or where that development provides the types of leisure, recreation, sport, arts or cultural facilities envisaged by policy G3****.*

User: Enfield RoadWatch

Metropolitan Open Land

We are concerned about policy **G3C** which allows land swaps. The open nature and environmental qualities of MOL are constantly being eroded by damaging proposals for inappropriate development. Strong policies are therefore required to halt such speculation and opportunism, rather than policies which are likely to mean that that it is acceptable to build on this land even if lesser quality MOL is created an unspecified distance away.

· Land swaps undermine the 'essential characteristic' of permanence, as set out in paragraphs 79-92 of the National Planning Policy Framework (NPPF), which as stated in paragraph 8.3.2, applies to MOL as it does to Green Belt.

- The proposed policy states the MOL resulting from a swap should meet 'at least one of the criteria set out in Part D', which could easily be read as 'only one of the criteria'. This means the resulting MOL is highly likely to be qualitatively considerably less valuable.
- The principle of land swaps creates a loophole that will be exploited by developers and others in ways that reduce the contribution of MOL to quality of life in London.

We suggest the following changes to the relevant sections:

Delete Policy G3C and the sentence in paragraph **8.3.2** which reads: *The principle of land swaps could be applied to MOL where the resulting MOL meets at least one of the criteria set out in part D of this policy.*

Amend Policy G3B to read: **The extension of MOL designations should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.**

User: Berkeley Group

9.3. The Mayor should not seek to prevent boroughs from considering opportunities to release poor quality green belt to deliver new homes, amenities and high quality public space that can be enjoyed by the local community. Indeed, the Mayor should be encouraging the boroughs to do so. Boroughs should be able to review green belt appropriately though the local plan as considered in the NPPF. Policies G2 and G3 should be amended to better reflect the NPPF (paragraphs 82 and 87):...

Policy G3 Metropolitan Open Land
A Metropolitan Open Land (MOL) should be protected from inappropriate development:
1) development proposals that would harm MOL should be refused other than in exceptional circumstances

User:	Rebecca Rose

I believe that everyone in London has the right to breathe clean air, have access to nature and to benefit from clean energy. I am therefore pleased to see policies in the new London Plan which seek to address these important environmental issues. These include policies to protect our Greenbelt and Metropolitan Open Land, a ban on fracking, and a commitment to London becoming zero carbon.

User: Kingston University

Policy G3: Metropolitan Open Land

Kingston University acknowledges that the purpose of London's MOL is to protect important open spaces from urban sprawl and to ensure that investment and development is focussed on previously developed land. While it is important to protect MOL, the draft London Plan does not make recognition of the fact that inappropriate development should be refused, except where 'very special circumstances' have been demonstrated; MOL policy has previously followed national Green Belt planning policy (as set out in the NPPF) in terms of its level of protection and policy tests and the University does not consider the proposed London Plan approach is sound. We do not consider there is justification to depart from the national 'very special circumstances' test and request this is re-inserted into the MOL policy test.

The new draft Policy G3 identifies that alterations to the boundary of MOL should be undertaken through the local plan process, in consultation with the Mayor and adjoining boroughs. The ability to review boundaries as part of the local plan review process is supported.

The supporting text to draft Policy G3 identifies that proposals to enhance access to MOL and to improve poorer quality areas such that they provide a wider range of benefits for Londoners that are appropriate within MOL will be encouraged. Examples include improved public access for all, inclusive design, recreation facilities, habitat creation, landscaping improvement and flood storage. This recognition is welcomed. It should also be acknowledged that there will be circumstances where in order to enhance recreational facilities, there may be an element of harm to MOL or a need for inappropriate development in its own right. There is therefore a lack of consistency in the practical implementation of this policy approach. The draft London Plan should be amended to address this issue. This could be clarified through the 'very special circumstances' NPPF policy test as noted above.

User:	Mr Peter Davies
It should not be possible to ‘swap’ designated Metropolitan Open Land.	

User:	London Borough of Bexley

Criteria has also been set in **Policy G3 Metropolitan Open Land** for the assessment of designating new MOL within London boroughs Local Plans, along with the need for evidence for proposed changes to existing MOL in **Paragraph 8.3.2**. The Council is carrying out a review of MOL as part of its assessment of green infrastructure, and will add new and/or adjust existing boundaries as appropriate as part of the Local Plan process with the Mayor and adjoining boroughs. The principle of land swaps set out in **Paragraph 8.3.2** is welcomed.

User: Redington Frognal Neighbourhood Forum

G3 Metropolitan Open Land. Although this policy protects Metropolitan Open Land (MOL) (which includes Hampstead Heath) from “inappropriate development”, the protection is undermined by Policy G3 C with the provision to allow “land swaps”. The principle of land swaps creates a loophole that will be exploited by developers and others in ways that reduce the contribution of MOL to quality of life in London. The open nature and environmental qualities of MOL are constantly being eroded by damaging proposals for inappropriate development. Strong policies are therefore required to halt such speculation and opportunism, rather than policies which are likely to mean that that it is acceptable to build on this land, even if lesser quality MOL is created an unspecified distance away.

Paragraph 8.3.2 is to be deleted: “The principle of land swaps could be applied to MOL where the resulting MOL meets at least one of the criteria set out in part D of this policy.”

Policy G3B should be amended to read: ‘The extension of MOL designations should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.”

Policy G3 C is to be deleted

User: SEGRO

Green Belt and Metropolitan Open Land
The above delivery mechanisms [set out in response to Policy E4] can help to assist the current shortfall in [industrial] capacity, however they are unlikely to make a fundamental difference in the way London's industrial needs are met. We recommend that the Mayor undertakes a Green Belt review to determine if any land within the Green Belt does not perform particularly well against the five purposes of Green Belt as set out in the National Planning Policy Framework (NPPF), and is not subject to other significant constraints which could make the land inappropriate and unsustainable for development.

Low value Green Belt ('Brown Belt') land in the right locations could provide a sustainable means of meeting London's industrial capacity needs if developed for industrial/logistics space. New industrial development in accessible locations within the Green Belt would still need to be complemented by a network of smaller, last mile facilities with London's urban areas, but could make a significantly positive impact upon the Capital's industrial capacity. If enough industrial space is delivered in the right locations along strategic road networks etc., then it may be possible to release some land for other uses which is less well located in terms of serving core supply chains for key markets.

Where London Boroughs wish to review their green belt boundaries and may wish to de-designate green belt and designate it for an alternative use, they should be allowed to do so. They will be subject to the statutory requirements to provide a robust evidence base and justify any changes to Green Belt policy through the local plan examination process. Borough led green belt reviews may enable industrial land to be delivered that is close to the arterial road network and close to highly accessible conurbations.

For the same reasons as have been set out in relation to Green Belt, we recommend that a less rigid approach is taken to **MOL policy**. Our suggested wording is as follows:

A Metropolitan Open Land (MOL) should be protected from inappropriate development:
1) development proposals that would harm MOL should be refused other than in exceptional circumstances

User:	Association of Local Government Archaeological Officers (ALGAO)

Welcome reference to historic interest under G3 for Metropolitan Open Land but we note this also applies to Greenbelt and Green Infrastructure and should be referenced there too. We consider that Historic Landscape Characterisation (promoted outside London by Historic England and referred to in NPPF paragraph 171) could be applied to better understand the contribution of the historic environment to green spaces and blue/green infrastructure.

User:	U+I

This policy should distinguish between green belt and metropolitan open land, recognising the lesser status of MOL. The policy should reflect the intention of proposed NPPF which indicates that priority should be given to development of brownfield sites within green belt/MOL and which deliver much needed housing. The extent of MOL should be reconsidered through the plan-making process, requiring paragraph b to allow for any alterations rather than merely extensions.

User: SEGRO

Appendix – SEGRO Proposed Policy Amendments to the Draft London Plan

Policy G3 Metropolitan Open Land

A Metropolitan Open Land (MOL) should be protected from inappropriate development:

1) development proposals that would harm MOL should be refused **other than in exceptional circumstances**

2) boroughs should work with partners to enhance the quality and range of uses of MOL.

B The extension of MOL designations should be supported where appropriate.

C Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.

D Boroughs should designate MOL by establishing that the land meets at least one of the following criteria:

1. it contributes to the physical structure of London by being clearly distinguishable from the built-up area
2. it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London
3. it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value
4. it forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.

User: CPRE London

Metropolitan Open Land (MOL)

We welcome recognition that MOL should be protected from inappropriate development but this policy is undermined by Policy G3 C and the provision to allow ‘land swaps’.

Proposed changes: Policy G3 C should be deleted along with the sentence in paragraph 8.3.2 “The principle of land swaps could be applied to MOL where the resulting MOL meets at least one of the criteria set out in part D of this policy”. Policy G3B should be amended to read: **‘The extension of MOL designations should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.’**

Rationale: The protection of MOL should be supported unequivocally to help realise the Mayor’s ambition to increase green space. ‘Land swaps’ undermine this because:

- The unique location and qualities of MOL are irreplaceable.
- They undermine the ‘essential characteristic’ of permanence, as set out in paragraphs 79-92 of the National Planning Policy Framework (NPPF), which as stated in paragraph 8.3.2, applies to MOL as it does to Green Belt.
- The proposed policy states the MOL resulting from a swap should meet ‘at least one of the criteria set out in Part D’, which could easily be read as ‘only one of the criteria’. This means the resulting MOL is highly likely to be qualitatively considerably less valuable.
- The principle of land swaps creates a loophole that will be exploited by developers and others in ways that reduce the contribution of MOL to quality of life in London.

The open nature and environmental qualities of MOL are constantly being eroded by damaging proposals for inappropriate development. Strong policies are required to halt such speculation and opportunism, rather than policies which suggest that it is acceptable to build on this land even if lesser quality MOL is created an unspecified distance away.

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- They undermine the ‘essential characteristic’ of permanence, as set out in paragraphs 79-92 of the National Planning Policy Framework (NPPF), which as stated in paragraph 8.3.2, applies to MOL as it does to Green Belt.
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- The principle of land swaps creates a loophole that will be exploited by developers and others in ways that reduce the contribution of MOL to quality of life in London.

The open nature and environmental qualities of MOL are constantly being eroded by damaging proposals for inappropriate development. Strong policies are required to halt such speculation and opportunism, rather than policies which suggest that it is acceptable to build on this land even if lesser quality MOL is created an unspecified distance away.

User: British Property Federation

We note that the principles of national Green Belt policy (stated within the NPPF) correspondingly apply to Metropolitan Open Land (MOL). We therefore reinforce our stated position in relation to Policy G2. We advise that Metropolitan Open Land is subject to an independent (and apolitical) review of its role and how it could potentially contribute to helping meet London's acute housing needs.

We do however welcome the acknowledgement within Policy G3, C that there is scope for the alteration of boundaries associated with Metropolitan Open Land, and believe that such aspects of special planning will be important in addressing London's acute housing need.

User: Mill Hill Preservation Society

Amongst the items that seemed particularly detrimental to Mill Hill residents have highlighted:

- Increasing the density of existing residential homes within PTALs 3-6 or within 800m of a Tube station, rail station or town centre boundary (small site development).

- Redeveloping retail and leisure parks to deliver housing intensification.
- A positive approach to the Build-to-Rent sector.
- Scrapping PTAL density ratings.
- The ability to ‘swap’ designated Metropolitan Open Land. (Policy G3C should be deleted.)

Residents are concerned at how these proposals will impact on the future development of Mill Hill – particularly in relation to The Broadway, Mill Hill East, the redevelopment of Pentavia Retail Park and the Neighbourhood Development Plan that is currently being written.

User: Dulwich Park Friends

It should not be possible to ‘swap’ designated Metropolitan Open Land.

Dulwich Park is metropolitan open land (MOL) so in particular we are concerned about the protection of MOL against development.

We welcome recognition that Metropolitan Open Land (MOL) should be protected from inappropriate development but this policy is undermined by Policy G3 C and the provision to allow ‘land swaps’ because MOL is characterised by its 'permanence'. **Proposed changes:** Policy G3 C should be deleted along with the sentence in paragraph 8.3.2 “The principle of land swaps could be applied to MOL where the resulting MOL meets at least one of the criteria set out in part D of this policy”. Policy G3B should be amended to read: **‘The extension of MOL designations should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.’**

User: Claire Mellish

I welcome recognition that Metropolitan Open Land (MOL) should be protected from inappropriate development but this policy is undermined by Policy G3 C and the provision to allow ‘land swaps’ because MOL is characterised by its 'permanence'. Proposed changes: Policy G3 C should be deleted along with the sentence in paragraph 8.3.2 “The principle of land swaps could be applied to MOL where the resulting MOL meets at least one of the criteria set out in part D of this policy”. Policy G3B should be amended to read: ‘The extension of MOL designations should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.’

User:	Town and Country Planning Association

Policy G3 – Metropolitan Open Land

3.7.8 The TCPA supports the protection of Metropolitan Open Land (MOL) set out in this policy and welcome the emphasis on improving its quality where possible.

User:	London Wildlife Trust

We have some concerns that this policy is weaker than that within the current London Plan (2015), in that it provides a loophole for land swaps – and that newly ‘designated’ MOL needs to meet only one of the criteria set out in Part D. Clause D4 does not add anything to the criteria as currently written, as an area of land that “meets one of the above criteria” qualifies as MOL even if it doesn’t form part of a strategic corridor.

User: Crest Nicholson PLC

We consider this Policy to be unsound as currently drafted and amendments are required.
We also concur with, but do not set out in detail here, the representations made by the HBF in relation to Policy G3 but that seek the following amendments to this Policy:

“B The extension of MOL designations should be supported where appropriate undertaken through the Local Plan process.”

“D Boroughs should designate MOL through the Local Plan process by…”

User:	Living Streets
We support policy G3.	

User:	West London River Group

The characteristics identified in G3 D1?4 apply to almost all of the River Thames and its banks and yet there is no inclusion of water space, including the River Thames, as being designated MOL, as is currently the case. The River Thames and other water space needs to remain designated Metropolitan Open Land as supported by 8.3.1.

User: Mr Paul McQuillen

I welcome recognition that Metropolitan Open Land (MOL) should be protected from inappropriate development but this policy is undermined by Policy G3 C and the provision to allow ‘land swaps’ because MOL is characterised by its 'permanence'. **Proposed changes:** Policy G3 C should be deleted along with the sentence in paragraph 8.3.2 “The principle of land swaps could be applied to MOL where the resulting MOL meets at least one of the criteria set out in part D of this policy”. Policy G3B should be amended to read: **‘The extension of MOL designations should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.’**

User: Janet Suzman

The plan will significally weaken protection for Hampstead Heath - the great lung of London. cf section 66 of the Planning (Listed Buildings & Conservation Areas) Act 1990. The integrity of the Heath should under no circumstances be broken ot threatened. MOL boundaries should only altered in *exceptional* circumstances cf par 83 of the NPPF. Hampstead Heath is a huge communal amenity, and besides, it combats pollution. Private gardens - valuably active anti-pollution green spaces - should also be included.

User:	Clive Prior
It should not be possible to ‘swap’ designated Metropolitan Open Land.	

User:	Glynis Neal
It should not be possible to ‘swap’ designated Metropolitan Open Land.	

User: Camden Town Conservation Area Advisory Committee

G3 C Draft policy: ‘Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.’

Our proposed amendments – reasoning: We are very concerned that alterations to boundaries may harm historic spaces. Land swaps can be very harmful to local communities.

Our proposed revised text: ‘Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs. There should be a presumption against changes to the boundaries of MOL which is also of heritage significance or community value.’

User:	Paul Benedyk
It should not be possible to ‘swap’ designated Metropolitan Open Land.	

User: Natalya Palit

In order to secure the longevity of good access to Metropolitan Open Land across the capital the Mayor should give consideration to putting in place policy provisions that encourage boroughs to think laterally and creatively about the regeneration of public open spaces how these spaces can be used most efficiently. An example of one such creative approach to the delivery of open space that makes efficient use of land is Rectory Farm in Hounslow. The Mayor should give consideration to actively encouraging boroughs to consider how to deliver open spaces that make efficient use of land, particularly in regeneration areas. To truly embed the aspiration of London being a ‘National City Park’ the Mayor should give consideration to setting out targets for each borough for the creation of public open green space over the Plan period, and requiring this to be planned for within borough Local Plans.

User:	London Borough of Sutton

SUPPORT WITH CONDITIONS. The London Borough of Sutton supports Policy G3 but recognises that a broad brush approach may not applicable in all circumstances.

User:	Jonathan Rooks
It should not be possible to ‘swap’ designated Metropolitan Open Land.	

User:	Nicos Ladas

Third, Policy G3. This applies to Hampstead Heath. It enables the boundaries of Metropolitan Open Land to be amended through “land swap” deals. Hampstead Heath is one of the most important areas of open space in London and is a “green lung” at the heart of our community [give personal examples of why Hampstead Heath is so important]. The London Plan should not allow Hampstead Heath’s boundaries to be amended.

User:	London Borough of Newham

Policy G3 Metropolitan Open Land

LBN are supportive of the policy which is complementary to Newham's Draft Revised Local Plan. Reference to ability to land swap is particularly welcomed as a useful response to changing land use contexts.

User: CFGN Community Food Growers Network

	Amends	Justification
G3	**New sub-paragraph after D2 – 'It includes significant agricultural or horticultural activity'.**	**The criteria for designation of Metropolitan Open Land should include land that has high public value in terms of food production, the level of use, recreation, social enterprise and educational opportunities it provides for Londoners.**

User:	Barnet Society

Para 8.3.2

We would like to see encouragement of cross-borough co-operation (including councils outside the GLA), as recognised in Policy G4

User:	Clarion Housing Group

The Capital’s increasing population densities intensifies the usage of, and pressure on Metropolitan Open Land. As with the Green Belt a careful review of its role and significance is desirable particularly in areas targeted at housing growth.

User:	Blackheath Society

Policy G3 Metropolitan open land: We welcome the policy to protect, enhance and where possible and appropriate, to extent Metropolitan Open Land (MOL). We note and welcome the requirement that any change to MOL boundaries which results in loss must be accompanied by thorough evidence demonstrating exceptional circumstances. It is important that this is rigorously enforced.

User:	Landscape Institute London
A – LI London recommends that the statement needs to be clearer on what is or isn't **'inappropriate'** development. All MOL should be protected from development not directly associated with improvements to the open space and its facilities, but it would be appropriate to upgrade (develop) play areas, cafes and other park elements.	

User:	Landscape Institute London

D – 2) LI London considers that the issue of ‘arts and cultural’ activities can be contentious, so should not necessarily count as criteria towards designation as MOL. Whilst occasional arts and cultural events have been happening on open spaces for centuries e.g. circuses and fairs, negative examples include noisy privately run music events. An example is the highly contentious closing off of part of Finsbury Park, already MOL, for several weeks over the summer for festivals like Wireless, that are highly profitable for the organisers but less so for the local authorities and highly disruptive for local residents.

User:	Landscape Institute London

LI London is concerned at the concept of ‘land swaps’ which would be detrimental to any MOL as a whole and also risk the fragmentation of greenspace and associated reduction in green infrastructure value. New greenspace provided elsewhere as a land swap would have to be able to meet or surpass the quality of the land being lost (historic, recreational, biodiverse) as well as meeting the requirements of the section D clauses and suggest this would only work if there is suitable adjacent land: unlikely in most inner city boroughs or areas of deprivation.

User:	Landscape Institute London
The term ’landscape’ improvement is a more acceptable term than ‘landscaping improvement’. Also at 8.4.4.	

User: The London Playing Fields Foundation

LPFF welcomes Policy G3 and the protection of MOL but highlights a potential risk in the expansion of MOL boundaries where appropriate, acknowledging that this would only be undertaken in exceptional circumstances as outlined in the NPPF.

We recognise that the protection and improvement of playing fields are vital and that attention needs to be drawn to the replacement of like for like or improved facilities if they are lost to development.

NO NET LOSS OF PITCHES MANTRA

LPFF has a policy position of **"no net loss of playing pitches**" and advocates the general presumption against the development, disposal or change of use of playing fields. Once a field is lost it is lost forever.

As a principle, there should be **no net loss of pitches** and no reduction in the amount of pitches available for use either for sport or informal recreation. Under use of a playing field should not necessarily be viewed as an indication of absence of need in the local area.

We also argue that if a playing field is lost to development it should be replaced by a playing field or fields of equivalent or better quantity and quality and in a suitable location. Sport England's view is that any potential loss may also result in the substitution of other indoor facilities but whilst this may be recognised as a viable alternative, it should not replace the loss of a grass pitch.

LPFF contends that in all cases there is a need to have an up to date assessment of demand to demonstrate that playing fields are surplus to requirements and accompanied by a thorough evidence base demonstrating exceptional circumstances as suggested in Paragraph 8.3.2. But the principle remains to plan for no net loss of pitches.

Fundamentally we agree with an evidence based approach based on local, accurate and up to date information. Too often documents are outdated or fail to make the case for sustainable development. In this situation the ability of planning department officials to interpret the data and make informed decisions is compromised. Despite the need for local authorities to provide adequate, up to date and relevant evidence through local assessments and audits of existing provision, many local authorities have failed to produce a Playing Pitch Strategy that could be integrated into the local plan hierarchy.

The case for cross borough planning

Cross boundary co-operation between local authorities on strategic priorities and a duty to work collaboratively with other bodies is supported by LPFF who has long campaigned that wider than local assessments are required to accommodate the migration of sports players who often cross borough boundaries when travelling to play sport.

For this reason, we welcome the new duty to co-operate with councils working together as described in the Localism Bill. This will further aid the strategic planning of sports facilities that are provided in the right place for local people to access. However, the inability to move playing fields from one area to another means that the current stock needs to be protected and retained for future generations.

User: London Beekeepers' Association

Comments on Policy G3

? Given the pressures on land use in London, we urge that MOL be protected, retained, and that public access is ensured.

? We welcome the recognition that MOL should be protected from inappropriate development, but this is undermined by Policy G3C and the provision for "land swaps". MOL is characterised by its "permanence", so land swaps are inappropriate.

User: Highgate School

At the heart of the School's Bishopswood Road Campus, are the majority of the School's sporting facilities, including several playing fields and a synthetic pitch. The majority of the Bishopswood Road Campus is designated as Metropolitan Open Land (MOL). (Please refer to Appendix 1).

As the School looks to upgrade its facilities, to meet modern academic requirements, it recognises that it must hold the in-principle protection of the MOL as the priority when considering how to bring forward its estate and growth strategy. Indeed, without prejudice to the criteria for designating MOL, the School sees itself as a custodian of the MOL and recognises the value that its openness brings to Highgate.

In its dealings with its Local Planning Authority, the London Borough of Haringey, both the School and the Council have recognised that very small elements of the existing MOL make no contribution to the purposes for which it exists. Both the current Statutory Development Plan and national planning policy set an extremely high bar that must be met before any consideration can be given to proposals that affect MOL land, even if that land serves no purpose.

The New London Plan seeks to bring forward a new policy in respect to the MOL; Policy G3. This seeks to remove reference to the National Planning Policy Framework, whilst at the same time overriding Haringey Council's recently adopted Local Plan.

The School objects to this approach for the following reasons:

1. The proposed new policy conflicts with the provisions of national planning policy set out in the National Planning Policy Framework (2012). In this regard, we consider that the policy is unsound when considered against Paragraph 182 of the NPPF which states that development policies should be "consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework".

2. The revised policy will prejudice opportunities to present justified VSC in support of development proposals which may include wider benefits for MOL itself, the general public and/or the School's pupil body. Indeed, its overly prescriptive nature prejudices the ability of the School to provide the necessary educational and sporting facilities as supporting by emerging Policy S1, S3 and S5. As such, the policy is not written positively.

3. The policy exceeds that which would be considered appropriate within a strategic plan; which is the purpose of the London Plan. It introduces development management controls more appropriate to the micro-level where there is a proper understanding of local circumstances, requirements, constraints and benefits. As such it removes the ability of the Local Planning Authority to make decisions appropriate to its locality, and which benefit its communities. As such it breaches the fundamental premise of the planning system.

Recommendations:
The current provisions of the current London Plan provide very strong controls in respect to potential development in the MOL and are consistent and compliant with the NPPF. It is considered that the wording of the current London Plan Policy 7.17 should be rolled over into the new plan as it has already proven to provide adequate strategic direction for Local Planning Authorities in London. Further, it has enabled each London Borough to consider the strategic requirement to protect MOL, against its own priorities and need. A comparison of the existing and proposed policies relating to the MOL is attached as Appendix 2.

User: North London Collegiate School

Draft Policy G3 – Metropolitan Open Land

Draft Policy G3 sets out the Mayor's position on Metropolitan Open Land ('MOL'). The policy affords protection from *'inappropriate development'* and establishes a position whereby development proposals that are considered *'harmful'* to MOL and should be refused. As drafted, Policy G3 only facilitates amendments to the boundary of borough MOLs through the borough's Local Plan process in consultation with the Mayor. Ultimately Draft Policy G3 seeks to apply the principles of national Green Belt policy to MOL in London.

NLCS welcomes the supporting text to Draft Policy G3 at para. 8.3.2 which allows for the principle of land swaps on MOL sites in cases where the resulting MOL meets at least one of the criteria set out in Draft Policy G3d. However, NLCS wish to stress that in scenarios such as its site at Canons Park, there are exceptional circumstances driven by curricular needs and educational demands which require sensitive development within MOL sites beyond that of an appropriate land swap. For example, and in the case of NLCS, the future growth, development and innovation of a nationally and internationally recognised performing school is constrained by the restrictions associated with MOL planning policy. Ultimately, the constraint proposed by Draft Policy G3d is a barrier to achieving the strategic educational aspirations as set out in Draft Policy S3B, 1-10 and is restricting the growth of a highly performing school in London.

NLCS therefore respectively asks the Mayor to consider appropriate and more flexible wording within Draft Policy G3d which allows for sensitive development in MOL where very special circumstances can be presented, and the development assists in supporting wider educational objectives around growth and innovation driven by curriculum demand.

User: Highgate Society

G3A - Object

As for G2, the two sub-points are contractory and lack definition. “Harmful development”, “range of uses” and “partners” need definition

G3C – Object

The words “Neighbourhood Plan process” should be added here. It is worrying that the Mayor is, apart from 0.0.9, silent on Neighbourhood Plans in this document.

In addition, since Metropolitan Open Land is the urban equivalent of, and has the same status as, Green Belt, the same considerations should apply to MOL as to Green Belt. Any other approach will risk undermining the status of MOL and diminishing the ability of Local Authorities and communities to protect their MOL.

User: London Borough of Ealing

Whilst the Council is keen to build in some flexibility into this policy, introducing the concept of land swaps represents a fundamental departure from previous MOL policies, which have previously explicitly mandated against such an approach. Whilst in very exceptional circumstances a land swap may give rise to a better configuration of open space, and therefore strengthen its MOL status, we suspect that its application to this end will likely be very limited, and instead this approach will likely be favoured to serve other (non-open space) policy objectives. We would not support its use to achieve the later.

Introducing the concept of land swaps might therefore represent a step too far. Should reference to it remain however, we would request that the text be amended to explain that any such swaps will need to be contingent on them strengthening the MOL status of the open space network, and that this goal should form the only driver for undertaking such swaps. The location of the existing space is also fundamental to consideration of such swaps, as the location itself might in fact be the critical factor determining its MOL status (for example if it forms a break in the urban form which defines the character of the area or serves an established catchment), and a land swap might therefore jeopardise this and would therefore be best avoided. Such changes must therefore also be plan led.

User: Peabody

1. With five lakes, 7km of waterways and over 150 hectares of open space, Thamesmead's abundance of green and blue space is one of its strongest assets.
2. However, due to poor design and a history of underinvestment, some of the green and blue spaces in the area are under-utilised, playing little significant role in facilitating leisure or recreation and failing to serve the needs of Thamesmead communities as well they might. The Draft Plan's approach to green spaces of all kinds needs to be both comprehensive and holistic, considering how green infrastructure can contribute to multiple aims, such as health and wellbeing, climate change mitigation, education and play.
3. A significant proportion of Thamesmead is currently designated as Metropolitan Open Land (MOL), yet much of this land is currently inaccessible to the public, possessing little qualitative value and serving little value despite the designation. The blanket application of an approach whereby any loss of Metropolitan Open Land must be off-set by equal re-provision elsewhere, with no consideration as to the qualitative value of provision, will impinge upon Thamesmead's potential to create new jobs and contribute towards solving London's housing crisis. In Thamesmead in particular, but across London as a whole, the Draft Plan's policy on MOL seems to sit awkwardly alongside the stated aim of maximising housing delivery.
4. As part of the review of Thamesmead's green and blue spaces, to ensure that the future landscape of Thamesmead becomes the high quality, safe, well managed, integrated, well used and multi-functional place it should be, there will need to be discussion around, as well as challenges to, the MOL designation. To truly reach its potential, there will need to be a careful balance between development and green space across Thamesmead, and it is quite possible that the carefully considered release of MOL for development will play a part in this. There may also be scenarios that suggest the redistribution or re-designation of MOL within Thamesmead to improve connectivity, access or use, for example. The OAPF process is critical in this process and should support the opportunity that Thamesmead presents.

User:	Natural England

We support the proposals to improve the quality and function of MoL.

Were the Plan to include a measure to support net gains in biodiversity, as per our response to policy G6, this may have the capacity to drive significant investment into MoL for enhancement of GI and provision of ecosystem services.

User:	Chairs of Camden's Conservation Area Advisory Committees

G3 C Draft policy: ‘Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.’
Our proposed amendments – reasoning: We are very concerned that alterations to boundaries may harm historic spaces. Land swaps can be very harmful to local communities.
Our proposed revised text: ‘Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs. There should be a presumption against changes to the boundaries of MOL which is also of heritage significance or community value.’

User:	CIBSE

We support the policy to protect London’s open land in recognition of its multiple functions, including leisure and sports facilities, transport, biodiversity, flood risk management and mitigation of the urban heat island effect.

User: Fulham Football Club

By its nature London is constrained and green space limited. This inevitably means that the training facilities for a number of elite performance team sports are located in the Green Belt or Metropolitan Open Land (MOL). Policy S5 as worded fails to acknowledge this fact. The very special circumstances of elite performance sports should be acknowledged and specifically referenced in Policy S5 (c). A failure to do this would be a failure to plan positively or strategically for elite performance sport. This is particularly important in circumstances where Policy G3 ‘Metropolitan Open Land’ fails to acknowledge circumstances where ‘very special circumstances’ may exist which would allow inappropriate development (see Paragraph 86 and 87 of the National Planning Policy Framework (NPPF)). The aspiration to protect the MOL is supported but the policy as set out in both Policy S5 and G3 is unacceptable as it fails to acknowledge the very special circumstances of certain land uses within the MOL or be consistent with the policy approach in the NPPF with respect to Green Belt. The Draft New London Plan fails to justify a divergence in approach to policy

Policy G3 as drafted needs to be amended to better reflect national policy and the particular circumstances of London. Failure to do so would be a failure to plan positively or strategically for elite performance sport.

User: Thames Gateway Kent Partnership

Policy G3 – Green Belts

The draft London Plan adopts a robust stance towards protection of London's Green Belt. However, the reality is that the Metropolitan Green Belt extends over much of North Kent as far as Medway and Maidstone, as well as other districts surrounding London. The need for appropriate protection of the metropolitan Green Belt, both within and outside Greater London is recognised by TGKP. However, a London Plan which is rigid and does not allow for flexibility at the local Borough level to provide for sustainable development in the most appropriate way risks an increase of development pressure on the metropolitan Green Belt as a whole.

In this context, there is concern about Policy G2, which provides no flexibility for the de-designation of Green Belt by London Boroughs at the Local Plan-making stage and supports extension of the Green Belt. Reduced flexibility for London Boroughs to explore sustainable growth options if they involve Green Belt land is not welcome given the scale of London's housing requirement, particularly with the potential knock-on implications for the Metropolitan Green Belt outside London if the Capital does not meet its medium and long-term development needs. Such a rigid approach is likely also to make delivery of social infrastructure needed to support housing growth, such as school and health facilities, more challenging for outer London boroughs with significant tranches of Green Belt and exert greater pressure on authorities outside the capital. We therefore suggest that the Mayor should reconsider this policy.

User: Annabel Bacal

Third, Policy G3.

This applies to Hampstead Heath. It enables the boundaries of Metropolitan Open Land to be amended through “land swap” deals. Hampstead
Heath is one of the most important areas of open space in London and is a “green lung” at the heart of our community [give personal examples of why Hampstead Heath is so important]. The London Plan should not allow Hampstead Heath’s boundaries to be amended.

User: West London Friends of the Earth

We very much support the Mayor's policies on protection of Green Belt and Metropolitan Open Land in Policies G2 and G3. But a third runway and associated infrastructure on Green Belt would be completely contrary to the principle of protection and should therefore be cited in Policy T8 as a reason for opposing Heathrow expansion.

Policy G2 says "The extension of the Green Belt will be supported, where appropriate. Its dedesignation will not." This should be strengthened to: "Its de-designation will be opposed." This is necessary so that the London Plan can be cited when proposals are made by Hounslow council and others build on Green Belt with 'airport related development' and/or de-designate Green Belt. A similar policy should be in place for MOL.

User: London Friends of Greenspaces Network

12. G3 We welcome recognition that Metropolitan Open Land (MOL) should be protected from inappropriate development but this policy is undermined by Policy G3 C and the provision to allow ‘land swaps’ because MOL is characterised by its 'permanence'.

Proposed changes: Policy G3 C should be deleted along with the sentence in paragraph 8.3.2 “The principle of land swaps could be applied to MOL where the resulting MOL meets at least one of the criteria set out in part D of this policy”. Policy G3B should be amended to read: ‘The extension of MOL designations should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.’

Rationale: The protection of MOL should be supported unequivocally to help realise the Mayor’s ambition to increase green space. ‘Land swaps’ undermine this because: The unique location and qualities of MOL are irreplaceable; They undermine the ‘essential characteristic’ of permanence, as set out in paragraphs 79-92 of the National Planning Policy Framework (NPPF), which as stated in paragraph 8.3.2, applies to MOL as it does to Green Belt; The proposed policy states the MOL resulting from a swap should meet ‘at least one of the criteria set out in Part D’, which could easily be read as ‘only one of the criteria’. This means the resulting MOL is highly likely to be qualitatively considerably less valuable; The principle of land swaps creates a loophole that will be exploited by developers and others in ways that reduce the contribution of MOL to quality of life in London.

The open nature and environmental qualities of MOL are constantly being eroded by damaging proposals for inappropriate development. Strong policies are required to halt such speculation and opportunism, rather than policies which suggest that it is acceptable to build on this land even if lesser quality MOL is created an unspecified distance away.

User:	Sustrans
We welcome the requirements to work with partners to enhance the quality and accessibility of Metropolitan Open Land including improved walking and cycling infrastructure as a key means of accessing the benefits of green space.	

User: Dr Carol Cooper

This applies to Hampstead Heath. It enables the boundaries of Metropolitan Open Land to be amended through “land swap” deals. Hampstead Heath is not just iconic. As a living breathing space, it is vital for health. As a family doctor, I appreciate how important this is.

I know from my previous communication to you before your election as Mayor that you take seriously the issue of cleaning up London’s air, so I hope you too will see the value of Hampstead Heath as a ‘green lung’.

It is also a vital open space for sport and recreation. The London Plan should not allow Hampstead Heath’s boundaries to be amended.

User:	Mrs Galina Portianoi

Third, Policy G3. This applies to Hampstead Heath. It enables the boundaries of Metropolitan Open Land to be amended through “land swap” deals. Hampstead Heath is one of the most important areas of open space in London and is a “green lung” at the heart of our community [give personal examples of why Hampstead Heath is so important]. The London Plan should not allow Hampstead Heath’s boundaries to be amended.

User:	Hornsey & Wood Green Labour Party

We welcome recognition that Metropolitan Open Land (MOL) should be protected from inappropriate development but this policy is undermined by Policy G3 C and the provision to allow ‘land swaps’ because MOL is characterised by its 'permanence'. Proposed changes: Policy G3 C should be deleted along with the sentence in paragraph 8.3.2 “The principle of land swaps could be applied to MOL where the resulting MOL meets at least one of the criteria set out in part D of this policy”. Policy G3B should be amended to read: ‘The extension of MOL designations should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.’

User:	Ruth Blair

The Draft Plan states that the principles of national Green Belt policyiy should apply to Metropolitan Open Land but then proceeds to not give it the same status.

User: Julian Cheyne

Fifth, there should be a ban on conversion of Metropolitan Open Land to any other use. MOL needs to be protected.

Sixth, particular requirements should be placed on authorities like the Lea Valley Regional Park Authority to prevent them selling off land or converting MOL to allow development. Authorities of this kind have a particular mission to safeguard their green spaces and this should be rigorously enforced without exception.

User:	Mr Ian Leonard
despite claims to increase green belt protection, all measures already announced exist,	

User: Mr Gregory Brackett

We recognise that public open spaces play an important role and should be protected from inappropriate development. However, there are circumstances where the current extent of the designated MOL is restricting the development potential of private sites which do not form part of the public open space.

For example the inclusion of the Canal Cottages and adjacent private land adjoining Victoria Park, as shown on the attached site location plan, does not meet any of the criteria for designation of land as MOL as set out in draft Policy G3. In particular:

• Canal Cottages does not contribute to the physical structure of London by being clearly distinguishable from the built-up area. Indeed, the land clearly forms part of the built-up area itself, being well connected to the properties on Parnell Road including the flats at Hertford Lock House;
• The land does not include any open air facilities, either for leisure, recreation, sports, arts and cultural activities or tourism. It comprises private houses, gardens and a private parcel of previously developed land;
• The land does not contain features or landscapes of historic, recreational, nature conservation or habitat interest, of value at a metropolitan or national level.
• The land does not form part of a “Green Chain”. Even if it did, it would also have to accord with at least one other criterion to justify designation as MOL.

It is notable that other properties adjoining Victoria Park are not within the MOL designation, including St. Mark’s Gate which is surrounded by MOL but specifically excluded from it as highlighted on the submitted extract of the Tower Hamlets Proposals Map. We have been making representations to the draft Tower Hamlets Local Plan which has currently reached the Regulation 19 stage. However, so far, the Council have not considered whether they should amend the MOL boundary as part of the work on this plan.

It is considered that the current wording of draft Policy G3 and Paragraph 8.3.2 is not in accordance with the National Planning Policy Framework (NPPF) as it is not appropriate for MOL designations to restrict development on private sites which do not fulfil the criteria set out in part (d) of the policy. Accordingly, Policy G3 should be amended to confirm that during LDF preparation the boundaries of MOL should be reviewed to establish that existing MOL land meets the four criteria as well as reviewing potential extensions.

The following wording is put forward (additional text underlined):

A. Metropolitan Open Land (MOL) should be protected from inappropriate development:
1. development proposals that would harm MOL should be refused
2. boroughs should work with partners to enhance the quality and range of uses of MOL.
B. The extension of MOL designations should be supported where appropriate.
C. Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.
D. Boroughs should designate MOL by establishing that the land meets at least one of the following criteria:
1. it contributes to the physical structure of London by being clearly distinguishable from the built-up area
2. it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London
3. it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value
4. it forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.
E. In cases where none of the criteria apply to an existing MOL designation the land may be de-designated as part of the LDF process."

This revision will ensure that the London Plan is positively prepared and justified as required by Paragraph 182 of the NPPF. It will ensure that it is based on a strategy which will enable the delivery of sustainable development of private sites which do not contribute to the functions of the MOL but are currently restricted because of their proximity to open land, such as Canal Cottages.

We trust these comments are helpful in progressing the alterations to the London Plan and confirm that we would be happy to provide further information and discuss in more detail the issues raised by this submission should that be required. In the meantime, we look forward to receiving your confirmation of receipt of the enclosed.

User: Lendlease

Part A of this policy which states that *“development proposals that would harm MOL should be refused”*. It represents a change compared with the current London Plan which states that inappropriate development, which is by definition harmful, should only be allowed in ‘very special circumstances’ in accordance with paragraph 88 of the NPPF. The blanket ban imposed by Part A is therefore inconsistent with the NPPF and the text supporting the policy, which states that “the principles of national Green Belt policy also apply to MOL” (para. 8.3.2).

Given the ambition of draft Plan to significantly boost the supply of housing, more than doubling current delivery rates, we are concerned that further restrictions on MOL development would potentially impact on the delivery of the new homes required. There are many small parts of MOL within London that currently do not form the proper functions of MOL and could be redeveloped to deliver homes. We would therefore suggest that part A is replaced with Part B of the current London Plan Policy (7.17), which states:

“The strongest protection should be given to London’s Metropolitan Open Land and inappropriate development refused, except in very special circumstances, giving the same level of protection as in the Green Belt. Essential ancillary facilities for appropriate uses will only be acceptable where they maintain the openness of MOL.”

User: Lendlease

Part A of this policy which states that *“development proposals that would harm MOL should be refused”*. It represents a change compared with the current London Plan which states that inappropriate development, which is by definition harmful, should only be allowed in ‘very special circumstances’ in accordance with paragraph 88 of the NPPF. The blanket ban imposed by Part A is therefore inconsistent with the NPPF and the text supporting the policy, which states that “the principles of national Green Belt policy also apply to MOL” (para. 8.3.2).

Given the ambition of draft Plan to significantly boost the supply of housing, more than doubling current delivery rates, we are concerned that further restrictions on MOL development would potentially impact on the delivery of the new homes required. There are many small parts of MOL within London that currently do not form the proper functions of MOL and could be redeveloped to deliver homes. We would therefore suggest that part A is replaced with Part B of the current London Plan Policy (7.17), which states:

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Part A of this policy which states that *“development proposals that would harm MOL should be refused”*. It represents a change compared with the current London Plan which states that inappropriate development, which is by definition harmful, should only be allowed in ‘very special circumstances’ in accordance with paragraph 88 of the NPPF. The blanket ban imposed by Part A is therefore inconsistent with the NPPF and the text supporting the policy, which states that “the principles of national Green Belt policy also apply to MOL” (para. 8.3.2).

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User:	Oneill Homer

G3 If Neighbourhood plans are able to make site allocations in the Green Belt in due course, then they should also be able to do so on MOL for the same intent and to operate land swaps.

User: Support Oakfield Society

Policy G4 Local green and open space

E . . .*[Add: 'E Neighbourhood Plans should be allowed to recommend that a site be designated as MOL when they can show that the land meets at least one of the above criteria.' Reason: communities should be encouraged to engage with boroughs to identify MOL for the benefit of Londoners.]*

Local green and open spaces should be *[Add: "vigorously"]* protected.

Boroughs should *[Replace with: "must"]* undertake a needs assessment of local green and open space to inform policy. . .

The loss of green and open spaces should be resisted in areas of deficiency. If losses are proposed outside of areas of deficiency, equivalent or better quality provision should *[Replace with: "must"]* be made within the local
catchment area unless an up-to-date needs assessment demonstrates this is unnecessary.

Development Plans and Opportunity Area Frameworks should: *[Replace with: "must"]*

User: Pinkham Way Alliance

Planning Policy

The National Planning Policy Framework (NPPF) (2012) sets out the Government's national policies on different aspects of planning in England. Section 10, paragraphs 109 to 125 detail planning policies on the conservation and enhancement of the natural environment. Circular 06/2005 provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system. In summary, it states that the planning system should contribute to and enhance the natural and local environment by:

- *minimising impacts on biodiversity and providing net gains in biodiversity where possible,*
- *more resilient to current and future pressures.biodiversity, including by establishing coherent ecological networks that are ??contributing to the Government's commitment to halt the overall decline in*
- *instance because of its environmental or historic significance; and??opportunities to identify land where development would be inappropriate, for*
- *contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been, identified.*

Paragraph 74 of the NPPF prohibits building on existing open space unless an assessment has been undertaken which has clearly shown the open space to be surplus to requirements or that the loss would be replaced by equivalent or better provision in a suitable location or the development is for sports or recreational needs that clearly outweigh the loss.

Paragraph 74 of the NPPF was considered by Mrs Justice Patterson in the case of Anne Marie Loader v Rother DC in June 2015, where it was found that "the criteria in paragraph 74 of the NPPF need to be interpreted to include the quality of the open space. In that case no assessment of the amenity value of the open space had been undertaken and no assessment had been undertaken to show it was surplus to requirements and that was found to be a material error."

The NPPF states that the planning system should contribute to and enhance the natural and local environment and at paragraph 114 directs planning authorities to set out a strategic approach in their local plans, planning positively for the creation, protection, and enhancement and management of networks of biodiversity and green

infrastructure.

In the light of the above and of other factors, including the fact that certain areas of the site are already Metropolitan Open Land, we consider that the site is unsuitable for development and instead qualifies for designation as Metropolitan Open Land under the criteria London Plan Policy G3. We shall be pursuing this with the Local Planning Authority in due course.

The target for the London Plan Key Performance Indicator (Protection of Biodiversity habitat) is "no net loss of SINCs". In addition, the loss of these trees and the transpiration they currently provide would be detrimental to the Mayor’s wish to increase the number of trees in London.

User: Pinkham Way Alliance

Planning Policy – open space

Paragraph 73 of the NPPF requires planning policies to be based on robust and up-to-date assessments of the needs for open space and opportunities for new provision. The assessments should be qualitative as well as quantitative. No up to date assessment of the open space value of Pinkham Way exists.

Paragraph 74 of the NPPF prohibits building on existing open space unless an assessment has been undertaken which has clearly shown the open space to be surplus to requirements or that the loss would be replaced by equivalent or better provision in a suitable location or the development is for sports or recreational needs that clearly outweigh the loss.

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In the light of the above and of other factors, including the fact that certain areas of the site are already Metropolitan Open Land, we consider that the site is unsuitable for development and instead qualifies for designation as Metropolitan Open Land under the criteria London Plan Policy G3. We shall be pursuing this with the Local Planning Authority in due course.

User:	Taylor Wimpey UK

Policy G3 Metropolitan Open Land

This policy should be amended to reflect circumstances where it may be possible to alter, replace or establish new Metropolitan Open Land.

User: Parkview International Ltd Group of Companies

Draft Policy G3: Metropolitan Open Land

The draft policy emphasis on the promotion of extensions to the designation of new MOL we consider is misplaced given London's significant population growth and hence the need to accommodate London's growing development needs within London's existing built up areas given the constraints of London's extensive and surrounding Green Belt.

The draft policy does not provide sufficient guidance of the role of Metropolitan Open Land (MOL) as distinct from the Green Belt.

It is our assessment that the National Planning Policy Framework (NPPF) does not specifically refer to, or define, MOL.

The NPPF, paragraph 80, does identify five functions of Green Belt as:

- To check the unrestricted sprawl of large built up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns; and
- To assist in the urban regeneration, by encouraging the recycling of derelict and other urban land

However, in our opinion, the purpose of the MOL is quite distinct from the purpose of the Green Belt. This is because MOL is within London's extensive, interconnected and continues urban area which itself is surrounded by the Green Belt.

Draft Policy G3 therefore needs to explicitly say what the purpose of the MOL is because in our opinion the purposes of the Green Belt are not automatically applicable to MOL; MOL is not synonymous with Green Belt.

The supporting statement in Draft Policy G3 that development proposals that harm the MOL should be refused should also not be unqualified. We would contend that Boroughs need to be able to take into account "very special circumstances" that may exist for development which outweighs the harm to the MOL; the policy therefore needs to be amended and so take a wider and balanced view of the other possible social, economic and environmental community benefits.

Given London's growing population and associated development needs, there will also be the need for Local Planning Authorities to review the boundaries of existing designated MOL land within the Local Plan process so as to ensure that existing designations still meet the purpose of MOL. There is also the need as part of the Local Plan process to assess whether there are "exceptional circumstances" which justify the review of MOL boundaries in order to meet the Local Plan's identified development needs.

The Policy therefore needs to identify what might constitute "exceptional circumstances" warranting alterations to the boundary of the MOL.

There also needs to be consistency in approach relating to the review of both Green Belt and MOL boundaries. Recent Government advice in relation to the review of Green Belt boundaries, identifies the "exceptional circumstances" for a green belt boundary review. In our opinion this approach can also be applied for the review of MOL boundaries when the Borough's identified development needs cannot be met by the following:

- making effective use of suitable brownfield and estate regeneration;
- the potential offered by under-used land (including surplus public sector land);
- optimising the density of development; and
- exploring whether other authorities can help to meet some of the identified development requirement.

Recommendations

In light of our assessment we consider that Draft London Policy G3 should be amended as follows:

Recommended Changes to London Plan G3

A) Metropolitan Open Land (MOL) should be protected from inappropriate development:

1. development proposals that would harm MOL should be refused *unless "very special circumstances" are demonstrated which outweigh the harm the MOL.*
2. Boroughs should *engage with owners of land comprising MOL and other stakeholders in order to seek to enhance the* quality and range of uses of MOL.

B)The extension of MOL designations should be supported *where it is evident that such an extension complies with the function of the MOL and also fully takes into account the Local Plan's other development needs.*

C) As part of their review of Local Plans, Boroughs need to assess whether there are "exceptional circumstances" which warrant a review of existing designated MOL boundaries.

D) Exceptional circumstances for a review of MOL boundaries are where Boroughs cannot meet their identified development needs from:

- *making effective use of suitable brownfield sites and estate regeneration;*
- *realising the potential offered by under-used land (including surplus public sector land);*
- *optimising the density of development;*
- *neighbouring authorities cannot help to meet some of the identified development requirements*

E) Boroughs should also review boundaries of the MOL where land designated as MOL does not meet at least three of the following criteria:

1. it contributes to the physical structure of London by being clearly distinguishable from the built-up area
2. it includes ***publicly accessible*** open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London
3. it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value
4. it forms part of a ***publicly accessible*** strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.

F) Any alterations to the boundary of MOL should be undertaken through the Local Plan process, *in consultation with the landowner, the Mayor and adjoining Boroughs.*

Proposed changes to the supporting text

8.3.1 Metropolitan Open Land *(MOL)* is strategic open land within the urban area. It plays an important role in London's green infrastructure – the network of green spaces, features and places around and within urban areas.

8.3.2 The purpose of the MOL – as distinct from Green Belt – is the following:

- *to protect and enhance the open environment*
- *to provide opportunities to improve Londoners' quality of life by providing localities which offer open air sporting and leisure use*
- *to provide opportunities to preserve and enhance features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value.*
- *to provide opportunities to form part of a strategic corridor, node or a link of green infrastructure.*

8.3.3 Not all designated MOL is publicly accessible open space for outdoor sport and recreation. Consequently, the use of MOL land by the public MOL purpose may require the agreement with landowners, the Boroughs and other stakeholders.

8.3.4 MOL boundaries should be reviewed within the Local Plan process where:

- *All, or part, of designated MOL land no longer meets all of the criteria for MOL designator and*
- *"exceptional circumstances" are demonstrated in order that the Borough can meet its identified development needs.*

8.3.5 The principle of land swaps could be applied to MOL where the resulting MOL meets the purpose of MOL designation.

User: RDI REIT

Metropolitan Open Land

We propose the reclassification of a small section of land at the Retail Park from its Metropolitan Open Land (MOL) designation. As detailed below, this section of land does not meet the MOL criteria and would therefore not affect London's green infrastructure. The reclassification of the land will permit the delivery of a new building that will enhance the vitality and viability of Colliers Wood and provide an enhanced green link along the River Wandle for residents.

We confirm that representations have also been made to the emerging Merton Local Plan in respect of this reclassification and pre application discussions have been undertaken with Merton Council.

The Site

The section of land we seek to reclassify is located on the north west boundary of the Retail Park (the '**Site**'). It adjoins Merton High Street and is currently occupied by a two sided commercial advertisement structure, palisade security fencing, and soft landscaping. The Site's exact location is detailed on Drawing Ref: 180254/SLP/001A – 'Site Location Plan' at **Appendix 1**. In addition, we enclose a photographic supplement of the existing commercial signage structure and wider surroundings at **Appendix 2**.

The Site is located within the boundary of the Colliers Woods District Centre, as defined by the adopted by the Merton Sites and Policies Plan and Policies Map (9 July 2014). It is therefore a 'town centre' site for the purposes of assessing proposals main town centre uses such as floorspace within Class A.

The Site is currently designated as MOL and Protected Open Space ('POS') in the Merton Policies Map. To allow development to come forward therefore, these designations would need to be altered.

Assessment Against MOL Criteria

Draft Policy G3 of the emerging London Plan states that for land to be designated as MOL, it must meet one of the following criteria:

A. it contributes to the physical structure of London by being clearly distinguishable from the built up area;
B. it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London;
C. it contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value;
D. it forms part of a strategic corridor, node or a link in the network of green infrastructure **and meets one of the above criteria**. (Our emphasis)

The Site forms part of the built up as it is within Colliers Wood District Centre and accommodates a large two sided commercial advertisement structure. It does not provide open air facilities that serve the whole or a significant part of London. In addition, it does not contain features or landscapes that are of a national or metropolitan value. Accordingly, The Site does not satisfy Criteria A-C for inclusion within the MOL designation.

To qualify under Criteria D, land must form part of a strategic corridor, node, or link **and** meet one of three preceding criteria. As noted above, the Site does not qualify under Criteria A-C therefore, it fails the second requirement of Criteria D.

Furthermore, the Site does not form part of a functional strategic corridor, node, or link. Policy DM01 'Open Space' of the Merton Sites and Policies Plan confirms that Greens Links should provide access between open spaces to promote walking and cycling. The functional Green Link comprises a linear path running along the River Wandle on the western boundary of the Retail Park. This Green Link provides permeability through the Retail Park to surrounding sites, as well as allowing for enjoyment of the natural environment.

This Green Link route however; effectively ends as it meets the Site. As a result of the advertisement structure and palisade fencing, the pedestrian path diverts from the River in easterly direction to run between the Site and the Kiss Me Hardy building. This less commodious route restricts universal access to approximately 20 metres of river bank. The site is not accessible and therefore does not function as part of a link or chain contrary to the requirements for such designations.

It is clear therefore, that the Site does not meet the criteria for inclusion in the MOL and Green Chain designation. For these reasons, we request that the MOL, Green Chain, and POS designations are removed from the Site.

The Proposed Development

The reclassification of the Site as MOL and POS would allow a number of enhancements to the Green Chain. These enhancements would be delivered through a proposal for a new coffee shop building at the Site. The new building would be situated approximately eight metres from the river bank to maintain the openness of the river setting. In addition, the removal of the commercial advertisement structure and palisade fencing will permit the creation of a new linear path to extend the functional Green Link. The development would benefit local residents by enhancing permeability and the scope for enjoyment of the River through new access with external seating areas.

Furthermore, the proposed building will help to integrate the Retail Park with the wider District Centre by creating outward facing commercial floorspace that adjoins the public highway. The proposal would help to activate this part of the site contributing to the overall vitality and viability of Colliers Wood.

The creation of the new coffee shop will assist in meeting a number of local policy aspirations for Colliers Wood. In accordance with draft Policy SD6 of the emerging London Plan, the proposal would:
? Assist in creating a thriving and attractive District Centre;
? Provide an increased range of main town centres, particularly those that will extend evening time activity in Colliers Wood;
? Creation of a more traditional linear building form along Merton High Street; and
? Enhance the visual appearance of the District Centre by replacing an advertisement structure and palisade fencing with a new, well designed building.

Our client has produced some initial scheme design options and we look forward to discussing these with the Greater London Authority.

User:	Chartered Institute for Archaeologists

The natural environment, landscape and parks are all created from land management and incorporate human activities over many centuries and are an archaeological as well as natural resource. The Green Infrastructure Plan G3 should demonstrate the wealth of historic environment incorporated in our green spaces and woodlands. A similar consideration should extend to policies for mineral extraction (SI10) and burial grounds (S7).

User: London Borough of Hillingdon

Policies G3 and G4 contain no strategic aspirations for the increase and provision of metropolitan open land (MOL). By its definition, MOL is a matter of
strategic importance and this is reflected in the text. Any changes to its boundary should be presented by the Mayor, either through a separate strategy or as part of the London Plan. However, criteria D of policy G3 sets the criteria for which the boroughs are expected to designate MOL.

Policy G4 then sets the criteria for boroughs to consider 'local green and open space'. The Council is concerned that the draft plan does not take responsibility for the strategic matters and is effectively making all open space matters a local issue, despite acknowledging MOL is clearly a strategic matter.

Taking account of the above comments, policy G3 should be revised to clearly detail what the GLA will do to designate and safeguard MOL and how boroughs can support that process. In addition, reference should be made to the protection of Green Chains, which provide a natural resource across London.

User: Dylon2 & Relta Ltd

Metropolitan Open Land

While we acknowledge the Mayor's strategic objective of protecting MOL from 'inappropriate' development, in plan making and decision taking, except where very special circumstances exist, being consistent with the current London Plan (policy 7.17B) and the National Planning Policy Framework (NPPF) (para 87) it is, we submit incumbent on the Mayor and the London Boroughs to review and ensure that all such existing designated MOL does genuinely contribute to one or more of three prime criteria for designation (G3D).

Draft policy (G3C) states that any alterations to MOL boundaries should be undertaken through the local plan process and sets the criteria for designation (G3D). This must apply both ways as whatever the intent or detailed wording of MOL policy, it can only be a sound policy if the land to which it relates justifiably warrants MOL designation and associated policy application.

Accordingly, local planning authorities (LPAs) should be required to undertake a full and comprehensive independent review of the MOL designated within their boroughs as part of the local plan process, remove land from the MOL where it clearly does not meet the purposes of MOL and introduce any land which should be so designated . Such an approach is consistent with the requirement for 'positive planning' and *" up-to-date and relevant evidence"* in the NPPF (para 158).

The necessity to only protect land that warrants such protection fully is acute in London, given the ever-increasing need for the identification of land for development, in particular to meet Londoners' housing needs.

Our experience is that some LPAs in London do not conduct the required independent detailed review

- of whether the currently designated parts of the MOL within their boroughs do all individually meet current London Plan criteria. Consequentially, there are sites still designated as MOL in London that do not fulfil the current of draft Policy G3D criteria . The continued 'protection in principle' of such land is both illogical and counterproductive to both Policy G3 and wider strategic draft London Plan objectives - most notably the need to deliver 'good growth' (Foreword) and economic development (para. 0.0.4).

Development proposed for such sites, which should have due regard to all other relevant planning considerations, has the potential to significantly improve these sites themselves and deliver benefits to Londoners' as sought in draft Policy G3 and supporting text.

We support the enhancement of the open environment to improve Londoners' quality of life through offering sporting and leisure use, heritage value, biodiversity, and health benefits through encouraging walking, running and other physical activity (DLP para. 8.3.1). We reiterate however, that these enhancements can be delivered as an integral part of well-considered development of land currently designated as MOL, particularly where MOL criteria are not being met, and where there is significant overall planning gain.

The relationship between MOL and strategic green infrastructure is noted (DLP para. 8.3.1), we recommend Policy G3 Part 04 is revised so as to be consistent with this function (i.e. removal of references to 'node' and 'link').

We support the principle of enhancing access to MOL (DLP para. 8.3.3). As indicated above, in some instances well-considered development within the MOL can both facilitate and deliver enhanced access .

Recommended Changes to the Plan

In summary, we support the intention of Policy G3 Metropolitan Open Land but strongly recommend that the policy explicitly requires LPAs to undertake an objective review in consultation with the Mayor and adjoining authorities, to assess the contribution of existing sites within the MOL to the stated criteria, in both plan making and, in the transition period ahead of adopting such plans, in decision taking . Our recommended alterations to the policy are provided below:

(strikethrough demonstrates a proposed deletion and bold, underlined a proposed insertion.)

G3

A. **Where it clearly meets the Metropolitan Open Land (MOL) criteria ,** MOL should be protected from inappropriate development , **except in very special circumstances.** Thus:

3) development proposals that would harm MOL should be refused, **except in very special circumstances**

4) boroughs should work with partners to enhance the quality and range of uses of MOL **and place weight on those enhancements in decision taking.**

B. The extension of MOL designations should be supported where appropriate **and evidenced by an objective review against the MOL designation criteria.**

C. ~~Any alterations to the boundary of MOL should~~ **A comprehensive review of MOL boundaries must** be undertaken through **each** Local Plan process **to determine any alterations; this must include an assessment of both existing MOL land and any potential new MOL land,** in consultation with the Mayor and adjoining boroughs.

D. Boroughs should designate MOL by establishing that the land meets at least one of the following criteria **and de-designate from the MOL any land which does not meet at least one of the criteria:**

1) it contributes to the physical structure of London by being clearly distinguishable from the built- up area

2) it includes open air facilities , especially for leisure, recreation , sport, the arts and cultural activities, which serve either the whole or significant parts of London

3) it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value

4) it forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.

User: Camden Conservatives

METROPOLITAN OPEN LAND: POLICY G3

12. Metropolitan Open Land (such as Hampstead Heath) should be given the same level of protection as Green Belt, as it is under the existing London Plan.

13. The policy fails to do this. There are three main areas in which the proposed policy significantly dilutes the protection given to MOL such as Hampstead Heath:

14. First, the policy should make clear that all new development within MOL is in principle inappropriate (unless it falls within the limited exceptions in paragraphs 89 and 90 of the NPPF). The policy, as written, is inconsistent with the protection given in national planning policy to Green Belts. It could enable individual planning applications to achieve planning permission, each acceptable in their own terms (and therefore permitted under Policy G3), but resulting in a death by a thousand cuts to MOL over time through the loss of its openness.

15. Second, the Mayor should make clear that the de-designation of MOL will not be supported (as he has done for Green Belt: see draft Policy G2(B)). The failure to make clear that the London Plan does not support the de-designation of Green Belt would mean that areas such as Hampstead Heath now have less protection than the Green Belt in the new London Plan.

16. Third, the proposal for “land swaps”, enabling land to be taken out of MOL if it is replaced by new land, is fundamentally flawed. The starting point is that MOL has the highest level of protection under national planning policy (commensurate with the Green Belt). Therefore, MOL boundaries should only be altered in exceptional circumstances: see paragraph 83 of the NPPF. Exceptional circumstances must exist both to remove land from MOL and to add land to MOL. Providing alternative MOL land in place of existing MOL is not an exceptional circumstance justifying the removal of existing land; and the fact that the “replacement” MOL would meet one of the four criteria set (e.g. that it is clearly distinguishable from the built up area) is not an exceptional circumstance sufficient to justify adding new land to MOL in its place. This part of the policy is completely inconsistent with paragraph 83 of the NPPF and should be deleted.

17. In any event, even if “land swaps” are acceptable in principle, the policy does not even ensure (i) that the replacement land is of the same quality as the lost MOL land (ii) is adjacent to existing MOL land. It would therefore, for example, enable part of Hampstead Heath to be de-designated, to be replaced by inferior open space some distance from the Heath. It should be deleted for this further reason.

18. For all of these reasons, Policy G3 is unsound.

User:	Abigail Woodman

The protections afforded to Green Belt and Metropolitan Open Land must be stronger. The new London Plan must make an unequivocal commitment to protecting them; they should be protected, not from inappropriate development but from development period.

User:	Abigail Woodman

The idea of land swaps must be scrapped as it weakens statements supporting the protection of Metropolitan Open Land.

User: Mrs Alona Sheridan

I welcome recognition that Metropolitan Open Land (MOL) should be protected from inappropriate development but this policy is undermined by Policy G3 C and the provision to allow ‘land swaps’ because MOL is characterised by its 'permanence'. **Proposed changes:** Policy G3 C should be deleted along with the sentence in paragraph 8.3.2 “The principle of land swaps could be applied to MOL where the resulting MOL meets at least one of the criteria set out in part D of this policy”. Policy G3B should be amended to read: **‘The extension of MOL designations should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.’**

User:	Blanche Cameron
It should not be possible to ‘swap’ designated Metropolitan Open Land.	

User:	Blanche Cameron

I welcome recognition that Metropolitan Open Land (MOL) should be protected from inappropriate development but this policy is undermined by Policy G3 C and the provision to allow ‘land swaps’ because MOL is characterised by its ‘permanence’. **Proposed changes:** Policy G3 C should be deleted along with the sentence in paragraph 8.3.2 “The principle of land swaps could be applied to MOL where the resulting MOL meets at least one of the criteria set out in part D of this policy”. Policy G3B should be amended to read: **‘The extension of MOL designations should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.’**

User:	Frank Harding

Thirdly, Policy G3. This applies to Hampstead Heath. It enables the boundaries of Metropolitan Open Land to be amended through “land swap” deals. Hampstead Heath is one of the most important areas of open space in London and is a “green lung” at the heart of our community. It provides local residents, visitors and tourists yo enjoy peace and calm ay the centre of a bustling metropolis; it provides magnificent views over central London; it enables people to exercise. In short it is one of the greatest amenities that London has to offer and must not be reduced. The London Plan must not allow Hampstead Heath’s boundaries to be amended.

User:	Teri Malakounda
“Swapping” designated Metropolitan Open Land should not be possible.	

User:	Julia Palca

Third, Policy G3. This applies to Hampstead Heath. It enables the boundaries of Metropolitan Open Land to be amended through “land swap” deals. Hampstead Heath is one of the most important areas of open space in London and is a “green lung” at the heart of our community [give personal examples of why Hampstead Heath is so important]. The London Plan should not allow Hampstead Heath’s boundaries to be amended.

User: Julia Palca

Metropolitan Open Land (such as Hampstead Heath) should be given the same level of protection as Green Belt, as it is under the existing London Plan.

The policy fails to do this. There are three main areas in which the proposed policy significantly dilutes the protection given to MOL such as Hampstead Heath:

First, the policy should make clear that all new development within MOL is in principle inappropriate (unless it falls within the limited exceptions in paragraphs 89 and 90 of the NPPF). The policy, as written, is inconsistent with the protection given in national planning policy to Green Belts. It could enable individual planning applications to achieve planning permission, each acceptable in their own terms (and therefore permitted under Policy G3), but resulting in a death by a thousand cuts to MOL over time through the loss of its openness.

Second, the Mayor should make clear that the de?designation of MOL will not be supported (as he has done for Green Belt: see draft Policy G2(B)). The failure to make clear that the London Plan does not support the de?designation of Green Belt would mean that areas such as Hampstead Heath now have less protection than the Green Belt in the new London Plan.

Third, the proposal for “land swaps”, enabling land to be taken out of MOL if it is replaced by new land, is fundamentally flawed. The starting point is that MOL has the highest level of protection under national planning policy (commensurate with the Green Belt). Therefore, MOL boundaries should only be altered in exceptional circumstances: see paragraph 83 of the NPPF. Exceptional circumstances must exist both to remove land from MOL and to add land to MOL. Providing alternative MOL land in place of existing MOL is not an exceptional circumstance justifying the removal of existing land; and the fact that the “replacement” MOL would meet one of the four criteria set (e.g. that it is clearly distinguishable from the built up area) is not an exceptional circumstance sufficient to justify adding new land to MOL in its place. This part of the policy is completely inconsistent with paragraph 83 of the NPPF and should be deleted.
In any event, even if “land swaps” are acceptable in principle, the policy does not even ensure (i) that the replacement land is of the same quality as the lost MOL land (ii) is adjacent to existing MOL land. It would therefore, for example, enable part of Hampstead Heath to be de?designated, to be replaced by inferior open space some distance from the Heath. It should be deleted for this further reason.

For all of these reasons, Policy G3 is unsound.

User:	Kathy Clauss
Policy G3. The London Plan should not allow Hampstead Heath’s boundaries to be amended.	

User:	Hackbridge & Beddington Corner Neighbourhood Development Group

There is not enough detail on what inappropriate development is. There needs to be guidelines or definitions on what is appropriate. We have witnessed personally what we believe is inappropriate with the build of an incinerator and we would like this policy to be reinforced with specifics.

User:	Louise Chatterton

Third, Policy G3. This applies to Hampstead Heath. It enables the boundaries of Metropolitan Open Land to be amended through “land swap” deals. Hampstead Heath is one of the most important areas of open space in London and is a “green lung” at the heart of our community [give personal examples of why Hampstead Heath is so important]. The London Plan should not allow Hampstead Heath’s boundaries to be amended.

User:	Mr Mark Davison

Third, Policy G3. This applies to Hampstead Heath. It enables the boundaries of Metropolitan Open Land to be amended through “land swap” deals. Hampstead Heath is one of the most important areas of open space in London and is a “green lung” at the heart of our community, an oasis of calm that helps many people (local and otherwise) cope with the pace of life in the city. The London Plan should not allow Hampstead Heath’s boundaries to be amended.

User: Richard Ferraro

This applies to open spaces like Hampstead Heath, which is local to where I live, and which I have enjoyed for many years. In the past, many attempts have been made by developers to encroach on the Heath, most of which have been rightly re?buffed.

However, proposed Policy G3 will enable the boundaries of Metropolitan Open Land to be amended through “land swap” deals. In my view, that proposal is wholly inappropriate and will be exploited by commercial developers to the detriment of the wider community.

Hampstead Heath is one of the most important areas of open space in London and is a “green lung” at the heart of different local communities. These include communities of different ethnicities and communities living in all forms of housing; including public sector housing, like Palgrave House (owned by Camden Council), where I live.

The London Plan should not permit any changes or amendments to the boundaries of Metropolitan Open Land including Hampstead Heath.

User:	Stephen Alexander

Trees and greenspaces are vital for the physical and emotional wellbeing of our very crowded city. At the moment Metropolitan Open Land has, in practice, no protection as it can be developed "in exceptional circumstances" Civil Servants will always be able to justify these exceptional circumstances, particularly if the use of public land saves costs and helps councillors to keep rates down. MOL needs greater protection than noble words.

User: HGH

Draft Policy G2 reiterates the importance of the Green Belt and states that it should be protected from inappropriate development. However, it fails to acknowledge that in ‘very special circumstances’ inappropriate development may be allowed. This is important in the context of the comments above in connection with professional sport. The current London Plan includes such reference in Policy 7.16 B and the New Draft Policy G2 should also be amended to reflect this.

Policy G3 Metropolitan Open Land

The comments for G2 above also apply here and the wording of G3 should also be amended accordingly.

User: London national Park City Foundation

Metropolitan Open Land - Policy G3, Page 303

A. Metropolitan Open Land (MOL) should be protected from inappropriate development: 1) development proposals that would harm MOL should be refused 2) boroughs should work with partners to enhance the quality and range of uses of MOL.

B. The extension of MOL designations should be supported where appropriate.

C. Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.

D. Boroughs should designate MOL by establishing that the land meets at least one of the following criteria: 1) it contributes to the physical structure of London by being clearly distinguishable from the built-up area 2) it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London 3) it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value 4) it forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.

Supporting text:

8.3.1 Metropolitan Open Land is strategic open land within the urban area. It plays an important role in London's green infrastructure – the network of green spaces, features and places around and within urban areas. MOL protects and enhances the open environment and improves Londoners' quality of life by providing localities which offer sporting and leisure use, heritage value, biodiversity, and health benefits through encouraging walking, running and other physical activity.

8.3.2 The principles of national Green Belt policy also apply to MOL. Any proposed changes to MOL boundaries which result in loss must be accompanied by thorough evidence which demonstrates that there are exceptional circumstances, as set out in the NPPF. The principle of land swaps could be applied to MOL where the resulting MOL meets at least one of the criteria set out in part D of this policy.

8.3.3 Proposals to enhance access to MOL and to improve poorer quality areas such that they provide a wider range of benefits for Londoners that are appropriate within MOL will be encouraged. Examples include improved public access for all, inclusive design, recreation

facilities, habitat creation, landscaping improvement and flood storage.

User:	Save Swiss Cottage

9. The Draft Plan states that the principles of national Green Belt policy should apply to Metropolitan Open Land but then proceeds to not give it the same status.

User: Brentford Football Club

We are writing on behalf of Brentford Football Club, which currently plays its football in the English Football League Championship, with keen ambitions to play in The Premier League in the near future. The Club currently has its training ground located on Metropolitan Open Land in Osterley, and is in the process of exploring its options for improving and enhancing its facilities on the same site in the future.

In this regard, we are aware that representations have been made on behalf of Fulham Football Club with respect to Draft London Plan Policy S5 - Sports and Recreation Facilities, specifically with regard to elite performance sport, the very special circumstances surrounding it and Metropolitan Open Land.

Having reviewed the Draft London Plan and Policy S5 ourselves, we are now writing on behalf of Brentford Football Club to state our strong support for the representations made on behalf of Fulham Football Club, and would like to reiterate their comments again as follows:

"London is home to numerous professional sporting teams and athletes across a wide variety of sports. These sports have both venues and training facilities throughout the Capital and contribute significantly to London's economy and reputation as a centre of sporting excellence. They also help to encourage take up and participation of sport and perform an important role in London's sporting eco-system.

The draft London Plan fails to acknowledge elite performance sport or provide any policy support for the protection of existing facilities or the need to improve and enhance facilities so as to ensure that professional sporting clubs, and the facilities that support them, can remain at the forefront of sporting excellence both nationally and internationally. As such, Policy 'S5 Sports and Recreational Facilities' fails to plan positively or strategically for elite sport and should be amended to include a new sub-category to the policy, which states:

"London is a centre of excellence for elite performance sports. The needs and requirements of elite performance sport differ from those of amateur and community sport and such differences should be acknowledged when considering development proposals. The London Plan supports the provision and enhancement of elite performance sports facilities to meet the needs of both Clubs and athletes to ensure that London maintains its position as a preeminent location for elite performance sport both nationally and internationally."

The adopted London Plan contains Policy 4.6 'Support for and enhancement of arts, culture, sports and entertainment' contained support for professional sporting enterprises. The draft London Plan does not include a similar policy to the detriment of elite performance sport. Policy S5 should be amended as outlined above to demonstrate London's support for sporting excellence and participation at all levels of sport.

By its nature London is constrained and green space limited. Elite performance team sports require large sites to accommodate the number of pitches/training areas required for training professional and development players while allowing for adequate pitch rotation to ensure the maintenance of quality playing surfaces. The evolution of professional sport over the last 20 years has also seen significant strides made in sports science and youth development. This means that elite performance team sports require different and more extensive facilities than are required by amateur and community sports or which were required by elite teams even 10 or 20 years ago. The London Plan fails to acknowledge the unique requirements of elite performance sport nor provide any support for these unique needs or requirements. It is considered that the London Plan fails to plan positively for the needs of elite performance sport and the evidence base has failed to consider the strategic needs of elite performance sports.

The nature and characteristics of London mean that a number of elite sport training facilities are located in the Green Belt or MOL. Policy S5 as worded fails to acknowledge this fact. The very special circumstances of elite performance sports should be acknowledged and specifically referenced in Policy S5 (C). A failure to do this would be a failure to plan positively for elite performance sport. This is particularly important in circumstances where Policy G3 'Metropolitan Open Land' fails to acknowledge circumstances where 'very special circumstances' may exist which would allow inappropriate development (see Paragraph 86 and 87). The aspiration to protect the MOL is supported but the policy as set out in both Policy S5 and G3 is unacceptable as it fails to acknowledge the very special circumstances of users of the MOL. Policy G3 as drafted needs to be amended to better reflect national policy and the particular circumstances of London. Failure to do so would be a failure to plan positively for elite performance sport."

User:	Primrose Hill Conservation Area Advisory Committee

G3 C Draft policy: ‘Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.’

Our proposed amendments – reasoning: We are very concerned that alterations to boundaries may harm historic spaces. Land swaps can be very harmful to local communities.
Our proposed revised text: ‘Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs. There should be a presumption against changes to the boundaries of MOL which is also of heritage significance or community value.’

User:	Nina Glass

This applies to Hampstead Heath and enables the boundaries of Metropolitan Open Land to be amended via "land swaps." Hampstead Heath is one of the most important open areas in London, a natural, green space, filled with beauty, and at the heart of our community. I walk the Heath often, and not only myself have pleasure from this 'green lung' of London but also, moreso, see the joy it gives younger people, older people, single people, groups of friends, families and animals (pets and the wildlife, itself, on the Heath). The London Plan should not allow Hampstead Heath's boundaries to be altered in any way; indeed, they shouldn't be amended in any fashion.

User:	Shari Donnenfeld

Third, Policy G3. This applies to Hampstead Heath. It enables the boundaries of Metropolitan Open Land to be amended through “land swap” deals. Hampstead Heath is one of the most important areas of open space in London and is a “green lung” at the heart of our community [give personal examples of why Hampstead Heath is so important]. The London Plan should not allow Hampstead Heath’s boundaries to be amended.

User: Regent's Park Conservation Areas Advisory Committees

Chapter 8 Green Infrastructure and Natural Environment

We broadly welcome policy on Green Belt.

G3 C Draft policy: ‘Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.’

Our proposed amendments – reasoning: We are very concerned that alterations to boundaries may harm historic spaces. Land swaps can be very harmful to local communities.

Our proposed revised text: ‘Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs. <u>There should be a presumption against changes to the boundaries of MOL which is also of heritage significance or community value.’</u>

Policy G4 Local green and open space

User: Royal Botanic Gardens, Kew

We would like to see more consideration of biodiversity explicitly included in Policy G4 Local Green and Open Spaces, with efforts to introduce different types of plant and fungi species in addition to trees, grasses, shrubs etc.

G4A

We recommend that not only are local green and open spaces protected, but also actively managed to enhance the biodiversity contained there and increase their natural capital value.[1] While the commitment to protect and create more green space is excellent, we are aware that some green spaces when not properly managed can become ‘green deserts’, with no real natural capital value.

One way to create more biodiverse green spaces with natural capital value could, for instance, be to plant orchards around sports fields or on school grounds. Wildflower seed mixes are also great way to bring biodiversity to open spaces, and we recommend a mix of annual and perennial plants, which provides both instant displays and some longer lived and larger plants.

G4B

We strongly support the creation of new areas of publicly-accessible green and open spaces. Kew’s outreach programme, Grow Wild, is the UK’s biggest ever wild flower campaign, bringing people together to transform urban and unloved local spaces with native, pollinator friendly wild flowers and plants. The community projects Grow Wild has funded demonstrate how sowing and growing UK native wild flowers and plants can bring new life to previously derelict sites and strengthen community links. [2]

Another example of excellent planting in publicly-accessible spaces is the Pictorial Meadow project.[3] The Olympic Park wildflower meadows, a striking feature during the Games and part of the Park’s legacy, is a great example of new areas of publicly-accessible green and open space brought to life with engaging planting. Pictorial Meadows have worked with city and local councils, including Coventry and Richmond Upon Thames. Public and open spaces can be both full of biodiversity and low maintenance if they are planned properly using expert advice.

G4D

We recommend that the biodiversity net gain principle be applied both in areas of deficiency and in cases of losses proposed outside of areas of deficiency.

G4E

We recommend that Development Plans and Opportunity Area Planning Frameworks take brownfield sites and land banks into consideration and account when looking to identify key green infrastructure assets and their potential function. These are pockets of land which could be excellent sources of and resources for wildlife. We believe that they should be managed as part of the green infrastructure network.

[1] Natural capital is our ‘stock’ of waters, land, air, species, minerals and oceans. This stock underpins our economy by producing value for people, both directly and indirectly. http://www.naturalcapitalcommittee.org/natural-capital/

[2] Grow Wild https://www.growwilduk.com/content/our-funded-projects

[3] Pictorial Meadows http://www.pictorialmeadows.co.uk/case-study/olympic-park-meadows/

User:	Publica

Publica supports the proposals to enhance green and open spaces to provide benefits for Londoners, and we suggest that improvements should enhance the adaptability of spaces to varied uses and occupants, as well as incorporating green and blue infrastructure. This should be done by first examining how the space is currently used, and how it could better meet the needs of a variety of users.

User:	Ms Torla Evans

Strengthen protection for all categories of public green space. Put a large percentage of existing London infrastructure levy agreements should be earmarked for green space revenue for the use of borough wide parks services.

User:	Mrs Hilary Gander

Private gardens contribute hugely in London to the extent of green space. A policy is needed to prevent extensive ‘garden grabbing’. Gardens should have more protection in the London Plan and the cumlative impact of garden grabbing in an area looked at by planners and LAs.

User:	Mrs Val Elliott
Open spaces also provide a wide variety of plants that pollinators feed on thus thriving and helping with the pollination of crops.	

User:	Putney Society
We strongly support this policy.	

User: The Open Space Society

Add: Boroughs should dedicate any green spaces in their ownership as town greens, under the Commons Act 2006. This will protect the land in perpetuity and give local people rights of informal recreation there.

Add: In appropriate cases, planning authorities should require developers to dedicate, as town or village green, land designated to form open space or other amenity land within a development. The benefits of such dedication are that the land is protected in perpetuity, and local people have rights of informal recreation there.

Explanation: a town green is land which has been registered under the Commons Registration Act 1965 or the Commons Act 2006. Once the land is registered, it is protected from encroachment or development by section 12 of the Inclosure Act 1845 and section 29 of the Commons Act 1876. Also, local people have legal rights of ‘lawful sports and pastimes’ there. Examples of town greens in London are Talacre Gardens, Camden; King’s Stairs Gardens, Southwark.

It should be noted that this is the strongest type of protection available for informal open spaces. The government’s designation of Local Green Space, introduced in the National Planning Policy Framework in 2012 is weak and uncertain, and it is unclear what if any protection is conferred by it.

If town greens are included within developments, local people will benefit.

User: The Open Space Society

Add: Boroughs should note the legal restrictions on commercial events on London's open spaces. Where an event is within the legal limit, boroughs should not normally permit commercial events which restrict public access to take place on open spaces. Where, exceptionally, such events are permitted they must be after consultation with local users and have effective sanctions to ensure the site is fully restored after use.

Explanation: increasingly we are seeing open spaces used for commercial events at the expense of local people who need that space for quiet recreation. There is also the risk that the site is left in a dreadful state which means that the borough has to use public funds to restore it. For example, Clapham Common was a sea of mud after the Winterville festival which was held over the new year, and it has still not recovered. Such abuse has occurred many times before. Public open spaces should not be exploited for commercial purposes.

User:	The Open Space Society

Add a new open space categorisation as follows.

Open space categorisation: Town and Village Greens

Description: these are areas of land which have been registered under the Commons Registration Act 1965 or the Commons Act 2006. They are land which has been dedicated voluntarily by a landowner, or they are land on which local people have proved that they have enjoyed 20 years' use, without challenge or interruption. The land can be of any size or nature.

Size: Varies

Distance from homes: land which is registered under the 20-year rule will normally be quite close to people's homes.

User: Telegraph Hill Society

Policy G4 Support and request for clarification

We support this policy. It is difficult to see however how Policy G4C can be implemented and the implications of it need to be reconciled with the remainder of this Plan.

The requirement to provide additional housing within our borough together with the recognition that open space will be required for the residents of those properties (who are unlikely given the density of housing required to have significant private gardens) means that additional publicly accessible green and open space will be required. However there is no indication how sufficient additional space can be provided given than much of the existing space which could be so used will be required for housing and where smaller sites are to be developed no such space would be available in the first place.

To put this in context, with a population of approximately 275,000 people, a requirement to build 21,170 new homes would suggest that at least a 10% increase in the amount of open green space is required in the borough: the current parks being already heavily used. We question whether there is scope for this and whether therefore the policy can practically be achieved. If the Mayor's office believes they can then more detail of how this is to be achieved should be set out in this policy.

Policy G4: Additional policy requirement

The Plan should provide targets for open space provision based on a per capita requirement.

The Plan sets out housing requirements and minimum room sizes. Given the acknowledgement in para 8.4.3 that the "creation of new green and open space is essential", the Plan should set out minimum targets for open space.

User: Home Builders Federation

The policy is unsound because it conflicts with national policy.

Paragraph 76 of the NPPF describes how the designation of Local Green Space is a matter for local authorities to determine as they prepare Local Plans and Neighbourhood Plans. The draft London Plan should not attempt to fetter the work of LPAs in this respect. This is not a strategic matter where it is appropriate for the Mayor to shape policy.

The Greater London Authority Act, 1999 in Part VIII, Section 334, (5) states that: *"The spatial development strategy must deal only with matters which are of strategic importance to Greater London".* While this could – and has – been interpreted widely, policy on Local Green Spaces is clearly a non-strategic matter.

NPPF, paragraph 76 states that "Local Green Spaces should only be designated when a plan is prepared or reviewed". Part B of the draft London Plan, as currently worded, does not reflect this requirement of national policy. In so far as the Mayor should have any remit in this area – and we do not believe that he has – Part B should be re-drafted to read:

"B The designation of new areas of publicly accessible Local Green Space should be undertaken through the preparation or review of the Local Plan."

User: Camden Conservatives

19. This policy fails to recognise the contribution of private gardens to the extent of green space within London. Significantly, the Draft London Plan fails to carry forward Policy 3.5 of the existing London Plan. This states as follows:
“Boroughs may in their LDFs introduce a presumption against development on back gardens or other private residential gardens where this can be locally justified.”

20. The failure of the Draft London Plan to carry forward this protection against garden grabbing (or at the very least to continue to enable the discretion that the existing London Plan gives to local authorities to develop their own policies) means that the Draft London Plan is inconsistent with paragraph 55 of the NPPF. This states:
“Local planning authorities should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area”

21. Policy G4 should be amended to include the wording of existing London Plan policy 3.5.

22. There is also no definition of “green space”. This needs to be provided and should make clear that it includes private gardens.

23. For all of these reasons, Policy G4 is unsound.

User:	EngineersHRW
Policy G4 Local green and open space *Note: The continued protection of London's local green and open space is strongly supported.*	

User:	The Pinner Association
support	

User:	Butterfly Conservation

Comments G4
? G4 D opens the door to off-setting. This is not supported, as it encourages degradation of original biodiversity. The ‘equivalent’ is very rarely like-for-like.
? There are in excess of 3,000,000 private gardens within Greater London, amounting to 24% of London’s area. 14% of this is estimated to be vegetated green garden space (GiGL CIC, 2015). Gardens are a significant resource for wildlife and people and play a particularly important role in creating networks of green spaces.
? The important contribution of private gardens needs acknowledging and we would welcome any policy that seeks to control excessive ‘garden grabbing’.

User:	Butterfly Conservation

G4 D opens the door to off-setting. This is not supported, as it encourages degradation of original biodiversity. The ‘equivalent’ is very rarely like-for-like.

User:	Royal Borough of Kensington and Chelsea
8.3 Policy G4 Local green and open space. The Council supports the stronger policy to resist the loss of space in areas with deficiencies.	

User: London Borough of Islington

Chapter

Green Infrastructure and the Natural Environment

Draft London Plan Policy

Policy G4 Local green and open space

Islington Response

The policy approach protects green and open spaces, promotes the provision of new areas of publicly accessible green and open space, as well as retaining the expectation for an assessment of need to be undertaken to inform policy. The principle remains of loss occurring only where there is no deficiency and where equivalent or better quality provision is provided. The wide range of benefits that green and open spaces provide is recognised as well as the importance of these spaces at a neighbourhood level. We support this policy.

The approach does not clearly define what local green space is and whether it is different to publicly accessible public open space and whether it should be considered differently as part of an assessment of need. Publicly accessible open space is set out in table 8.1 and the use of the categorisation is clear in terms of assessment. The link then between assessment of local green space and then the target to make London at least 50% green by 2050 is not clear - does local green and open space contribute to this target.

New developments in areas of publicly accessible open space which provide green and open space should be required to ensure that the green spaces are designed to provide residents a range of benefits and that developers should not be allowed to restrict access to green areas on the basis of tenure. These green spaces could include landscaped areas for bio-diversity, for relaxation, and formal and informal play spaces for children. The more residents can benefit from and enjoy their own green spaces, the less pressure there will be on existing public spaces.

User:	Association of Consultancy & Engineering

Protecting and creating local green and open spaces is an important and essential element to improving placemaking for communities. ACE supports and welcomes this policy and believes all London boroughs should have targets for the percentage of green and open space created as a proportion of all new developments.

User:	LFoSR - The London Federation of Sport and Recreation

Table 8.1 contains a reference to "playing fields" in the established description of "District Parks". One of the main weaknesses in the Plan is it considers playing fields, as well as sports and recreation facilities only in the context of local / community provision.

User: The Royal Society for the Protection of Birds (RSPB)

Local Green and open spaces should be **enhanced** as well as protected (see Policy G4, point A). **The London Plan should require London Boroughs to achieve net gains in high quality green spaces** in line with the Mayor's objective to 'make more than of half of London's area green by 2050'. This could be built into Part B of policy G4.

Suggested addition to policy G4:

Propose that Paragraph 8.4.4 (p.306) should be included within policy G4 with the following additions (in bold, italics): 'Proposals to enhance green and open spaces to provide a wider range of benefits for Londoners will be encouraged. Examples could include improved public ***access and connection to nature*** for all, inclusive design, recreation facilities, habitat creation, landscaping improvement or flood storage.'

As mentioned earlier, we would be keen to use our partnership with idverde to demonstrate how green and open spaces can be better managed for biodiversity.

User: The Royal Society for the Protection of Birds (RSPB)

Local Green and open spaces should be **enhanced** as well as protected (see Policy G4, point A). **The London Plan should require London Boroughs to achieve net gains in high quality green spaces** in line with the Mayor's objective to 'make more than of half of London's area green by 2050'. This could be built into Part B of policy G4.

Suggested addition to policy G4:

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As mentioned earlier, we would be keen to use our partnership with idverde to demonstrate how green and open spaces can be better managed for biodiversity.

User: Simon Saville

Policy G4

I am concerned that Policy G4 contains insufficient recognition of the contribution of private gardens to the extent of green space. A policy is needed to prevent widespread "garden grabbing".

Proposed change

? Policy G4A should be revised to include reference to private gardens to read: **"Local green and open spaces, including public and private gardens, should be protected".**

I welcome support for the creation of new areas of accessible green and open space. These provisions should be strengthened by requiring measures in Policy G4 to improve the quality of green space.

User:	PCS Trade Union

In line with the Mayor’s aim to make “London at least 50 per cent green by 2050” (8.1.3) we believe a firm commitment should be made that there will be no loss of current green space, and that clear reference is made to the use of green space as part of flood defence strategies, and in tackling poor air quality.

User:	City of London Corporation

The protection of existing local green and open spaces and the requirement to assess needs and plan for additional space where needed, is supported. The explanatory memorandum should address the potential for green roofs, rooftop amenity spaces or skygardens to contribute towards the provision of amenity space particularly within central London areas such as the City where opportunities for additional local green and open space at ground level are limited.

User:	London Tree Officers Association

The policy direction to increase housing capacity in the capital is in direct conflict with the preservation and improvement of existing local green space and school playing fields. The LTOA considers this conflict needs to be addressed.

User:	Elizabeth Breeze

Bravo that you are aiming for a greener, cleaner London plan. For me green spaces and reduction of pollution take priority. Fewer motor vehicles wherever possible. Preserve our parks, encourage private green areas in squares and gardens. Don't use toxic pesticides in public spaces.

User:	London Borough of Barnet

We welcome and generally support the approach to green infrastructure set out in the DLP. Barnet's recently adopted Green Infrastructure SPD broadly reflects and is consistent with DLP policies on Green Infrastructure and Natural Environment. Barnet recognises the need for food growing spaces within the Green Infrastructure SPD and will give consideration to the inclusion of a policy within our new local plan which further supports community food growing.

User:	Space Syntax Limited

These spaces should be considered in relation to people's day-to-day activities such as commute, not only as leisure destinations.

The location of these spaces in the network should be considered rather than focusing on the amount of space as it influences on the accessibility of these spaces in people's everyday life.

User: Amy Luff

Private and public gardens should be protected alongside other local green and open spaces.

Policies and funding are needed to improve the quality of green space by reducing noise, light and air pollution, increasing biodiversity, and by giving stronger protection to mature trees and hedgerows.

User:	Thames Water

Some of our infrastructure sites have also been designated as local open space, even though there may be no public access.

Policy G4 should be amended to include: *‘Some of London’s utility infrastructure, such as reservoirs and treatment plants are also designated as local open space and will require upgrading to meet the requirements of population growth, climate change and environmental regulations.’*

User:	Elizabeth Rosen
Please remember us the ordinary people of London who value parks and green spaces for a civilised life.	

User: Pam Laurance

I would like to see a stronger push for the provision and the preservation of green spaces and nature. There are a number of studies that point to a link between people's health and well-being (here is a link to one of them http://journals.plos.org/plosone/article?id=10.1371/journal.pone.0149777) and access to nature. Also they are just enjoyable places to be - and, particularly for people in over-crowded homes, often without access to outside space, a nice place to relax, and to play with ones children is an important asset.

User: Ms Nicola Clark

Private and public gardens should be protected alongside other local greens and open spaces.

I am concerned that Policy G4 contains insufficient recognition of the contribution of private gardens to the extent of green space. A policy is needed to prevent extensive ‘garden grabbing’. Proposed change: Policy G4 A should be revised to include reference to private gardens to read: ‘Local green and open spaces, including public and private gardens, should be protected’.

User: Ms Nicola Clark

Policies and funding are needed to improve the quality of green space by reducing noise, light and air pollution, increasing biodiversity, and by giving stronger protection to mature trees and especially hedgerows.

I welcome support for the creation of new areas of accessible green and open space.

These provisions should be strengthened by requiring measures in Policy G4 to improve the quality of green space.

User:	Ms Ann Turvey

I note the support for the creation of new areas of accessible green and open space. This is to be commended. And thereby wildlife will be encouraged. And our lives improved and enhanced.

User:	Katherine Bligh

I cannot support this Plan as it does not:-

- protect and enhance green and open spaces, such as Hampstead Heath, which are our ‘lungs’ and so environmentally important to our health and well-being

User: London Assembly Planning Committee

Recommendations Policy G4 C and D need to consider whether loss of local green and open space should be considered outside areas deemed ‘deficient’. Table 8.1 (Public open space categorisation) needs to be reviewed and incorporate categories of open space such as playing fields and small scale open areas used as community resources which are distinct in function and scale to pocket parks. These spaces should be part of the needs assessment specified in G4 C and subject to the same level of protection as set out in G4 1.
9.6 Policy G4 D only resists proposals that include loss of local open and green space in areas of deficiency. There is no similar policy for areas that are not areas of deficiency making them vulnerable to speculative proposals to remove their local open and green spaces. Indeed, the policy appears to sanction the loss of local green and open spaces in areas that are not areas of deficiency, if there is equivalent provision in the local catchment area.
9.7 This policy overlooks the “local” aspect of local green and open spaces as the most important aspect of such spaces: the need to walk further, cross a road or the risk of being outside of the sight line of an adult makes all the difference to access, use and appreciation of local green and open spaces particularly by vulnerable groups such as older people, children and those with mobility challenges.
9.8 The Planning Committee has heard compelling evidence79 for reviewing the Draft London Plan Table 8.1 to incorporate categories of open space such as playing fields and small scale open areas used as community resources which are distinct in function and scale to pocket parks. These smaller, local, open spaces should be accorded protection too under Policy G4 1.

User: Waterloo Community Development Group

We object to this paragraph, which does not appear to be in accord with the NPPF. The wording would allow development of part of a piece of open space in any area demarked as not deficient, provided that better quality provision is provided on the remaining open space. This surely cannot be the intention? Furthermore, there would likely be proposals where the needs assessment doesn't show an area as deficient in open space, but if the proposal to build on some open space without equivalent replacement in terms of quantity would tip the neighbourhood into an area of open space deficiency. Again, this isn't the intention, surely? London's communities need the patchwork of open spaces

NPPF para 74 states

"Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

? an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or

? the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of ***quantity and quality*** in a suitable location; or

? the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss." (my emphasis)

This policy would be acceptable if the words "and quantity" were added.

User:	London Borough of Lambeth

Loss in quantity of green and open space should be resisted across the board, not just in areas of open space deficiency: owing to population growth, more and more people are making use of a finite quantity of open space. If incremental losses are allowed in exchange for improvements to remaining space, over time this will result in gradual erosion of a resource that can never be replaced.

The title of this policy is unclear, which is likely to cause confusion at implementation. Does the policy only seek to protect open spaces that are green and local? Or does the policy seek to protect local green spaces and local open spaces? Lambeth notes para 8.4.3 states ‘the creation of green or open space is essential…’ This might suggest the policy seeks to protect green spaces and open spaces. Current London Plan policy is on protecting ‘open space’. Taking this into account Lambeth suggests the policy should be renamed ‘Green space and open space’. MOL is clearly covered by another policy.

User: Belsize Residents Association

Large parts of Belsize are areas of open space deficiency. That means that families, that often live in flats without gardens, have to walk a long way to open spaces. Over the last years, the encroachment on the limited amounts of open spaces has been noticeable, as construction in-filling occurs, as gardens are built into and as developments take chunks of land (such as HS2 taking open space). We feel the policies in the London Plan (G4) are at best aspirational and, at worst, reversed by the continuous theme throughout the rest of the Plan for relaxing planning requirements.

We would suggest that this part of the Plan has more accountability:

- The Mayor asks that Boroughs track and detail the reduction in open space due to developments and planning changes
- This part of the London Plan has targets and delivery tracked in terms of actual open space being created/lost.

User:	Wandle Valley Forum

We welcome recognition of the contribution of Regional Parks in Table 8.1, albeit this goes beyond their role in providing networks of open spaces. The London Plan plays an important role in identifying those assets which embrace more than one London borough. We ask that explicit recognition is given in planning policy to this role and that the existing Regional Parks in London, including the Wandle Valley Regional Park, are identified in the supporting text and in a new map.

User:	Wandle Valley Forum

We welcome recognition of the contribution of Metropolitan Parks in Table 8.1, as distinct from Regional Parks. The London Plan should support their designation by Boroughs and address those which involve more than one Borough. We have identified the potential of a new Metropolitan Park stretching from Beddington Park (Sutton) across Beddington Farmland and Mitcham Common to Mitcham Fair Green (Merton). This is an area more than three times to size of Hyde Park which would benefit from coherent management, better access and protection through planning policy. We seek recognition for the role of Metropolitan Parks which involve more than one Borough, including the potential new Wandle Metropolitan Park.

User:	Somers Town Neighbourhood Forum

We would like to see more clarity of Policy 4: Local green and open space. The policy assert that all local green and open spaces should be protected and that boroughs should undertake a needs assessment of local green and open space to inform policy. We believe that that needs assessment should look at all types of local green and open space, both public and private. Some of our most treasured green spaces are private community gardens, for example.

User: London Tenants Federation

Policy G4 Local green and open spaces

We propose that G4 should include ‘**green space on housing estates should be protected and enhanced’.** The management and maintenance of these spaces are paid for through tenants’ rents and service charges rather than through council tax. A fair number are though also open to the general public. They form precious play, relaxation and gardening spaces for many low-income households that might struggle financially to access larger areas of green space outside their immediate areas.

User:	London Borough of Haringey
The policy is supported. Types of Green Spaces should be identified, to increase the ability of providing an increase in biodiversity.	

User:	Lib Dem Candidates for Hampstead Town

Policy G4: Local green and open space - there has already been considerable loss of residential gardens, and we must stop further loss through adverse development. Gardens are essential for the health of humans and the environment, It is essential that they be protected for environmental and amenity reasons.

User:	London Borough of Lewisham

We support G4, especially the approach to protecting and creating local green and open space in order to address areas of deficiency and the need to link open spaces across borough boundaries.

User:	Environment Agency

We support this policy, including the requirement for development plans and Opportunity Area Frameworks to plan for policy objectives in green infrastructure strategies. We suggest greater weight is attached to assessing accessibility to green space. Natural England’s response also refers.

User:	Environment Agency
We welcome the table, but highlight that playing fields are not included as a category. These provide an important contribution to the capital’s stock of open space.	

User: Environment Agency

We welcome the call for boroughs to undertake assessments to inform their green infrastructure strategies, but recommend amendments. We recognise that boroughs' capacity to undertake green infrastructure strategies will vary. We suggest that further Plan encouragement for boroughs to work together on preparing joint strategies, would help to spread the resource burden, and enable better consideration of strategic infrastructure.

Recommendation:

Para. 8.4.2. Add to text, that 'boroughs should consider the opportunities and benefits from co-operation on preparing joint strategies, across administrative boundaries, to deliver strategic green infrastructure interventions'. This may have synergies with boroughs' assessments of sustainable transport links, and flood management.

User:	London Borough of Brent

The Council supports this policy. The policy should also ensure that satisfactory arrangements are in place for local green and open space to be managed and maintained to ensure the benefits are sustainable.

User: London Borough of Bromley

The Council supports the principle of G4 and clause A and welcomes the protection of non-strategic open space, which would include Urban Open Space, open spaces and private gardens. However this appears to conflict with other policies in the draft London Plan that no longer presume to protect private residential gardens which make a valuable contribution to London's open spaces.

There is concern around the wording of the consultation London Plan policy in Clause D which opens up the possibility of designated Open Space to be built upon in areas where there is no deficiency in spaces in that category.

The title of the Policy may be ambiguous as it may seem to be making reference to the Local Green Space designation as introduced in the National planning Policy Framework and included in Bromley's Draft Local Plan which clearly is not the intention of this policy.

User: London Councils

The matter of including appropriate designations and policies for the protection of green and open spaces is not relevant solely to areas where deficiencies currently exist. Growth in numbers of residents, workers and visitors will place additional pressure on existing spaces in London. They will therefore need to be protected as a resource to address future needs. Open spaces in inner London areas are a finite resource and it is difficult to secure significant new areas of ground level open space.

The proposal that Development Plans and Opportunity Area Frameworks should ensure that future green and open spaces are planned for in areas with the potential for substantial change is supported. However, the Plan should be clear that green and open space contributions should be required for all developments subject to the need they generate.

There is a concern about the ability of the interim thresholds to be achieved where no green roofs will be provided. On many sites, it will not be practical to provide the types of green suggested due to site characteristics. Measures such as trees and hedges (due to the site area covered) are likely to have a limited impact on the overall urban greening factors applied to a scheme. Rather than introducing, a policy requirement at this stage – which seems to give a unjustifiably high rating for amenity grassland - we consider it would be better to defer the setting of factors to the boroughs, allowing area wide circumstances to be taken into account. It would also be helpful if the policy could provide assurance that offsets, such as tree planting, in a different part of a borough to the site of the proposed scheme, comply with the statutory tests set out in paragraph 204 of the National Planning Policy Framework.

Currently, boroughs can negotiate what is appropriate for a site taking into account the precise nature of the scheme, how it will be occupied and managed and circumstances of individual sites and buildings. It is vital that the urban greening factors cannot be used as a way for applicants to justify they do not need address the impact of their occupants on existing public open spaces.

User:	London Borough of Tower Hamlets

Stronger support for the creation of publicly accessible open spaces is welcomed.

Unconditional protection of open spaces in areas of deficiency is welcomed as it strengthens our ability to prevent loss in areas of deficiency.

User: Old Bermondsey Village Neighbourhood Forum

Community developments, site briefs and open spaces:

NLP should enable local communities to have greater power in identifying and taking on sites for community developments (limited presently to ACVs which have limited success aside from with Pubs) and in shaping the briefs for key local sites and public spaces. Site Allocations in the New Southwark Plan for example are deeply unsound on all counts due to a superficial understanding of sites and vague wording resulting in incoherent and unsustainable briefs

User: Save Swiss Cottage

Policy G4 Local green and open spaces We propose that G4 should include '**green space on housing estates should be protected and enhanced**'. The management and maintenance of these spaces are paid for through tenants' rents and service charges rather than through council tax. A fair number are though also open to the general public. They form precious play, relaxation and gardening spaces for many low-income households that might struggle financially to access larger areas of green space outside their immediate areas.

LOCAL GREEN AND OPEN SPACE: POLICY G4
19. This policy fails to recognise the contribution of private gardens to the extent of green space within London. Significantly, the Draft London Plan fails to carry forward Policy 3.5 of the existing London Plan. This states as follows: "Boroughs may in their LDFs introduce a presumption against development on back gardens or other private residential gardens where this can be locally justified."
20. The failure of the Draft London Plan to carry forward this protection against garden grabbing (or at the very least to continue to enable the discretion that the existing London Plan gives to local authorities to develop their own policies) means that the Draft London Plan is inconsistent with paragraph 55 of the NPPF. This states:
"Local planning authorities should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area"
21. Policy G4 should be amended to include the wording of existing London Plan policy 3.5.
22. There is also no definition of "green space". This needs to be provided and should make clear that it includes private gardens.

User:	Royal Borough of Kingston
Support.	

User:	London Borough of Waltham Forest

We consider there should be an understanding not only of the amount of green space but also the quality of that green space when considering whether or not it should be protected. A needs assessment of green space is a good idea but again will require additional resource.

User: London Borough of Hillingdon

Policies G3 and G4 contain no strategic aspirations for the increase and provision of metropolitan open land (MOL). By its definition, MOL is a matter of
strategic importance and this is reflected in the text. Any changes to its boundary should be presented by the Mayor, either through a separate strategy or as part of the London Plan. However, criteria D of policy G3 sets the criteria for which the boroughs are expected to designate MOL.

Policy G4 then sets the criteria for boroughs to consider 'local green and open space'. The Council is concerned that the draft plan does not take responsibility for the strategic matters and is effectively making all open space matters a local issue, despite acknowledging MOL is clearly a strategic matter.

Taking account of the above comments, policy G3 should be revised to clearly detail what the GLA will do to designate and safeguard MOL and how boroughs can support that process. In addition, reference should be made to the protection of Green Chains, which provide a natural resource across London.

User: HFFTRA

Policy G4 Local green and open spaces

We propose that G4 should include ‘**green space on housing estates should be protected and enhanced’.** The management and maintenance of these spaces are paid for through tenants’ rents and service charges rather than through council tax. A fair number are though also open to the general public. They form precious play, relaxation and gardening spaces for many low-income households that might struggle financially to access larger areas of green space outside their immediate areas.

User:	Marion Lerminiaux

Making London greener is essential for people’s health and wellbeing. Yet many local green spaces face pressure from new development. The Plan must recognise that loss of green space cannot always be made up for through green roofs and sustainable drainage schemes, valuable though these features are (para 4.2.9). Policy should make clear that provision of and access to green space should always be considered when planning new development.

User:	London Borough of Merton

Support with amendments “Local green and open space” (and all forms of this throughout the policy – “green and open space”) is not defined within the Glossary and Policy G4 needs to be clear about what it is referring to specifically so that there is no confusion with NPPF 76-78.

User:	Swale Borough Council

Whilst not quite as prescriptive at Policy G3, we query whether it is internally consistent, with Clause A appearing to preclude any loss, whilst the rest of the policy does imply that it could be considered. If Clause A prevails, then all of the points made in respect of Policy G2 and G3 apply.

User:	Ms R Farooq
I am pleased that the draft recognises the importance of green spaces but policies need to be stronger to give them adequate protection	

User:	London Borough of Hackney

Hackney supports this policy which encourages connectivity across the network of green and open spaces and emphasises the importance of provision of green space in areas of deficiency.

User:	Ms R Farooq

Private and public gardens should be protected alongside other local green and open spaces.

User:	Ms R Farooq

Policies and funding are needed to improve the quality of green space by reducing noise, light and air pollution, increasing biodiversity, and by giving stronger protection to mature trees and hedgerows.

User: London Borough of Hounslow

LB Hounslow supports this policy approach although the policy should also ensure that satisfactory arrangements are in place for local green and open space to be managed and maintained to ensure the benefits are sustainable. Furthermore, it should include protection for all green space under the categories of District Parks, Local Parks and Open Spaces, Small Open Spaces, Pocket Parks and Linear Open Spaces listed in Table 8.1 – Public open space categorisation along with Commons and London Squares.

Policy G4 should be amended as follows:

Policy G4 ~~Local~~ Other green and open space
A ~~Local~~ All green and open spaces should be protected.
C Boroughs should undertake a needs assessment of ~~local~~ all green and open spaces to inform policy…..

In relation to Paragraph 8.4.3, the Council strongly supports the move to secure appropriate management and maintenance of open spaces in places of deficiency, especially Privately Owned Public Space and suggest that you cross reference this to Policy D7 G Public Realm and the Public London Charter.

In relation to Table 8.1 on Public open space categorisation, the Council believes that in light of the draft Environment Strategy's cognisance of the importance of quality green space and our better understanding of the value of green space through Natural Capital Accounting, this table needs a thorough revision. Its focus is on the size and proximity from homes is a good start. We propose that a column is added that lists the multiple benefits or functions of these open spaces.

User: London Borough of Hounslow

LB Hounslow supports this policy approach although the policy should also ensure that satisfactory arrangements are in place for local green and open space to be managed and maintained to ensure the benefits are sustainable. Furthermore, it should include protection for all green space under the categories of District Parks, Local Parks and Open Spaces, Small Open Spaces, Pocket Parks and Linear Open Spaces listed in Table 8.1 – Public open space categorisation along with Commons and London Squares.

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User:	Alison Hatt

I totally support Policy G2 and G4; in fact these could be strengthened to include more references to planting more trees.G7 refers to their protection-too late for Tooting Bec Common where Wandsworth Council’s act of vandalism has destroyed venerable horse chestnut trees-but crucial for healthy environment.

User:	London Borough of Southwark

The council recommends the requirement to undertake an assessment of local green and open space should take account of quantity and quality.

User: London Borough of Redbridge

The Council supports the overall aims of policy G4 but considers that the proposed approach to development set out in the London Plan could increase demand on existing open spaces, both to build on and also in regard to demand. This is especially true as areas of the borough with the highest projected population growth are generally those with the least access to green space. In addition these areas would also see the highest levels of development within the existing and new London Plan.

Creative solutions, in the spirit of the borough's own "Ilford Garden Junction" proposal, for the co-location of green space with other facilities should be supported in areas of deficiency, for example by providing a vegetated cover to open road or railway cuttings, or providing utilities underneath public squares.

Releasing low quality green belt would allow for previously inaccessible land to be made accessible for leisure and recreational uses, and for new housing to be located with good access to that land. For example, land at Five Oaks Lane, Chigwell had a history of unregulated and inappropriate uses in the Green Belt, most of them no longer subject to planning enforcement due to the passage of time. The redevelopment of this site enabled the built area of the site to be consolidated and densified within part of the site, delivering new housing and facilities, with the remainder released as publically accessible open space to provide ecological corridors and serve the new development.

This approach could be applied to other previously developed land in the Green Belt, whereby inaccessible land is made accessible as part of a new development and improved through a master planned approach, thereby contributing towards part B of Policy G1.

User:	London Borough of Wandsworth

The Council welcomes the protection of MOL and local green and open space. However the Council urges the inclusion of the phrase “publicly accessible” to this statement e.g.: “ensure that future publicly accessible green and open space needs are planned for in areas with potential for substantial change “. Criteria E2 should include reference to maintenance which is paramount to their success.

User: London Borough of Harrow

The Policy is supported (S5).

There are however fundamental challenges on this matter related to public sector funding! increased pressure due to population rises I opportunities for land for extensive new facilities which will place a greater reliance on provision on multi-functional artificial pitches. There may also be current restrictions on some facilities related to hours where additional lighting is not required. The policy could be amended to allow greater flexibility to assist in increasing capacity of facilities.

Paragraph (C) should also be amended to include reference to Policy G2: Londons Green Belt and G4: Local green and open space, to cover all circumstances where facilities maybe proposed on existing open space.

User:	London Borough of Richmond Upon Thames

No comments.

User:	Expedition Engineering and Useful Studio

- The policy states that Boroughs should undertake needs assessments. Clearer guidance on how this should be assessed would be helpful with clarity about provision.
- The role and function of civic space as part of open space provision should be more clearly defined. Such spaces play a particularly key role in Opportunity Areas where they act as meeting places, spaces for events, and support the function of transport hubs.
- The definitions in the glossary don’t fully cover the terminology used in policy. “Publicly accessible” is used in policy but not defined. It’s important that this is defined given the fact that much of the new public open space to be provided in London will be in private ownership/management. Also, it’s not made clear enough if “Local Green and Open Space” covers civic spaces and areas of hard landscaping. The glossary definition for Open Space indicates that it does, but the policy and supporting text indicates that its refers to just green spaces.

User:	JJ Whitson

A short note to add to my voice to speaking up for trees and woodland in the New London Plan. I believe woodland and trees can improve health, beauty and the general well-being of a community. Please, “no net loss of overall green cover!”

User:	London Borough of Harrow
The policy is supported. Types of Green Spaces should be identified, to increase the ability of providing an increase in biodiversity.	

User:	Greenspace Information for Greater London CIC (GiGL)

GiGL response: there is also a need for the creation of green and open spaces that are inaccessible to the public because biodiversity and public access aren’t always compatible. Good examples of this include the habitat creation and restoration work along London’s railway linesides.

User:	Jenny Fisher

Policies and funding are needed to improve the quality of green space by reducing noise, light and air pollution, increasing biodiversity, and by giving stronger protection to mature trees and hedgerows.

User: Mr Joe Ward

We broadly welcome Policy G4 concerning local green and open space. We are concerned however that this contains insufficient recognition of the contribution of private gardens to the extent of green space. A policy is needed to prevent extensive ‘garden grabbing’.

Proposed change:

Policy G4 A should be revised to include reference to private gardens to read: **‘Local green and open spaces, including public and private gardens, should be protected’.**

Rationale: We welcome the Mayor’s aim to encourage the intensification of land use in London, including by promoting the use of small sites for housing (with reservations addressed above). Policies need to ensure that this does not result in the loss of green space, whether public or private. Any presumption in favour of building on small or underused sites should favour adding storeys rather than building out into private gardens.

User: Mr Joe Ward

We welcome support for the creation of new areas of accessible green space. This should be strengthened by requiring measures in Policy G4 to improve the quality of green space.

Proposed change

· Policy G4 C – should read "Assessments should identify areas of public green and open space deficiency, **including an assessment of deficiency in quality, taking account of Green Flag criteria, light, noise and air pollution, and** using the categorisation set out in Table 8.1 as a benchmark for all the different types required."

· Policy G4 E 1) should include at the end **'including an assessment of, and where appropriate a plan, to improve the quality of the space'**.

Rationale: We support borough assessments of local green and open space to inform policy. To increase the benefits of green space, these should include an assessment of, and where appropriate a plan to improve the quality of the space i.e. an assessment of deficiency in quality rather than just amount of green space and its accessibility. For example, CPRE London's recent research has found that nearly 30% of London's parks and green spaces are severely impacted by noise from traffic (and presumably associated air pollution). Much green space is poor quality in other ways, such as poorly designed or excessive lighting. The Plan should require boroughs to enhance and manage all greenspaces to a high, specified standard referencing the Green Flag criteria.

User: (FOE) Friends of the Earth England Wales and Northern Ireland

This is potentially a good policy to address lack of provision in places which lack green space or where quality is poor. We particularly support criterion A "that local green and open spaces should be protected". We consider that it would be helpful to include within this policy a requirement to plan for these as part of any significant new development. With regard to green space assessments referred to in Criterion C, we suggest the policy should also acknowledge the need to consider the quality of the green space and the importance of maintaining and enhancing this.

User: (FOE) Friends of the Earth England Wales and Northern Ireland

Local green spaces face pressure in the drive to build and increase the density of development. Paragraph 4.2.9 states that 'Loss of existing biodiversity or green space as a result of small housing developments, should be mitigated through measures such as the installation of green roofs, the provision of landscaping that facilitates sustainable urban drainage, or off-site provision such as new street trees in order to achieve the principle of no net loss of overall green cover'. It is important that such mitigation does not encourage or lead to the loss of locally accessible green space.

We suggest text be added to make clear that green roofs and sustainable drainage schemes while worthwhile features in themselves, are not a substitute for accessible green space (para 4.2.9) and in many instances loss of a local green space would be entirely inappropriate.

User:	London Borough of Enfield

Policy G4 focuses on ‘Local green and open space’. A clear definition of what constitutes local green and open space is needed. It also needs to mention green infrastructure on the highway. However green infrastructure guidance is required in order to make informed representations regarding local green and open space.

User: John Innes Society

We strongly object to Policy G4 C and D. Local Green Spaces.
The loss of Green Spaces should always be resisted, not just in areas of deficiency. Otherwise a presumption will arise that loss of Green Spaces (which category should include private gardens) is acceptable until the deficiency limits are reached. That would be a race to the bottom and result in irrevocable harm to health and bio-diversity.

User: Berkeley Group

9.4. Local green and open spaces are important in providing local amenity. There may be instances where they could be redeveloped with new green/open space provided. Policy G4 should be amended:

Policy G4 Local green and open space
A Local green and open spaces should be protected or appropriately re-provided within the local catchment area.
D The loss of green and open spaces should be resisted in areas of
Deficiency unless appropriate re-provision in made.

User: Just Space

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

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

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

Green Space and Infrastructure

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

What Needs to be Done:

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

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

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

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

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

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

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

User:	Mr Peter Davies

Private and public gardens should be protected alongside other local green and open spaces.

User: London Borough of Bexley

What is really damaging from this approach will be the loss of the mature trees in gardens, as these are hard to replicate on a green wall or roof, even though these are presumably protected by **Policy G7 Trees and woodlands**. In the main, the policies look to afford protections to *designated* green assets, such as Metropolitan Open Land, to public green spaces, as outlined in **Policy G4 Local green and open space**, and to Sites of Importance for Nature Conservation in **Policy G6 Biodiversity and access to nature**, but not to the modest suburban London garden.

The focus of **Policy G4 Local green and open space** and its accompanying **Table 8.1** is on those green spaces that are publicly accessible. However, even green spaces that cannot be accessed by people still have an amenity value. Being able to look out over an area from a viewpoint, and seeing all the green from residential gardens, including mature trees, is a benefit to people's overall health and wellbeing. This needs to be acknowledged in the text in **Chapter 8**, and the vegetated land cover of residential gardens should be referenced in the first type of surface cover in **Table 8.2**.

User: Buckinghamshire and Milton Keynes Natural Environment Partnership

Policy G4 – Local green and open space

The NEP recognises and supports the value of well-planned and accessible local green space and welcomes a mechanism that should be a requirement to ensure green space of different sizes is available to everyone within a certain distance from their homes. Table 8.1 sets out the benchmark and we welcome a measure like this to be a requirement for planning and advocate a stretch target for green space availability and accessibility.

The NEP's GI Vision and Principles also advocate planning for biodiversity as well as access and wellbeing, looking across borders to optimise opportunities and securing funding for maintenance of the functionality of green spaces into the long-term.

User:	London Healthier Places

This policy requires Boroughs to undertake a needs assessment of local green and open space to inform policy. The assessment should take into account not only "quantity", but "quality" too.

User: Redington Frognal Neighbourhood Forum

Policy G4 Local green and open space. This contains insufficient recognition of the contribution of private gardens to the extent of green space. A policy is needed to prevent extensive ‘garden grabbing’.

Policy G4A should be revised to read, “Local green and open spaces, including public and private gardens, should be protected.”

Policy G4 C should read, “Assessments should identify areas of public green and open space deficiency, including an assessment of deficiency in quality, taking account of Green Flag criteria, noise and air pollution, and using the categorisation set out in Table 8.1 as a benchmark for all the different types required.”

Policy G4 E 1) should include at the end, “including an assessment of, and where appropriate a plan, to improve the quality of the space.”

An additional point G4 F should be added to explicitly note that, G4 F “Sunlight levels are particularly important to the quality and utility of green spaces and, notably, micro green spaces. Development must not cause an reduction to sunlight levels on green space, in order not to harm their value.“

User: London NHS Clinical Commissioning Group

Policy G4 Local green and open space

We support Policy G4 and, in particular, support new public open space provision or improved access in areas of deficiency, but suggest that paragraph 8.4.3 should recognise that there is unequal access to green space in London with people living in the most deprived areas being less likely to live near green spaces. We support paragraph 8.4.4, but more emphasis could be placed on improving the quality of existing open spaces and the need to invest in the maintenance of spaces and equipment.

User: CPRE London

Private gardens (‘garden grabbing’)

We broadly welcome Policy G4 concerning local green and open space. We are concerned however that this contains insufficient recognition of the contribution of private gardens to the extent of green space. A policy is needed to prevent extensive ‘garden grabbing’.

Proposed change:

Policy G4 A should be revised to include reference to private gardens to read: **‘Local green and open spaces, including public and private gardens, should be protected’.**

Rationale: We welcome the Mayor’s aim to encourage the intensification of land use in London, including by promoting the use of small sites for housing (with reservations addressed above). Policies need to ensure that this does not result in the loss of green space, whether public or private. Any presumption in favour of building on small or underused sites should favour adding storeys rather than building out into private gardens.

User: CPRE London

Green space deficiency

We welcome support for the creation of new areas of accessible green space. This should be strengthened by requiring measures in Policy G4 to improve the quality of green space.

Proposed change

- Policy G4 C – should read "Assessments should identify areas of public green and open space deficiency, **including an assessment of deficiency in quality, taking account of Green Flag criteria, light, noise and air pollution, and** using the categorisation set out in Table 8.1 as a benchmark for all the different types required."
- Policy G4 E 1) should include at the end **'including an assessment of, and where appropriate a plan, to improve the quality of the space'**.

Rationale: We support borough assessments of local green and open space to inform policy. To increase the benefits of green space, these should include an assessment of, and where appropriate a plan to improve the quality of the space i.e. an assessment of deficiency in quality rather than just amount of green space and its accessibility. For example, CPRE London's recent research has found that nearly 30% of London's parks and green spaces are severely impacted by noise from traffic (and presumably associated air pollution). Much green space is poor quality in other ways, such as poorly designed or excessive lighting. The Plan should require boroughs to enhance and manage all greenspaces to a high, specified standard referencing the Green Flag criteria.

User: British Property Federation

The protection and enhancement of London's green and open spaces is welcome, and it is acknowledged that a good level of provision and a variety of space is crucial to facilitating great places in which people want to live, work and play. The consideration of green infrastructure and how green spaces can add value to the development of an area is crucial.

It is acknowledged within the draft plan that London faces some significant challenges in providing the appropriate amount and standard of development to address growing need. It must therefore be recognised that if policies relating to the protection and enhancement of green/open space are to be strengthened, there must be a necessary shift in the densities delivered and the best use of suitable development sites. Within London's finite land area, in order to house a growing number of residents, businesses, and social infrastructure whilst hitting a target of making '*50 per cent of London green by 2050'* densities must be maximised and innovation promoted on suitable sites.

User:	Dulwich Park Friends

Policies and funding are needed to improve the quality of green space by reducing noise, light and air pollution, increasing biodiversity, and by giving stronger protection to mature trees and hedgerows.

User: Claire Mellish

I am concerned that Policy G4 contains insufficient recognition of the contribution of private gardens to the extent of green space and their critical importance to wildlife corridors. A policy is needed to prevent extensive ‘garden grabbing’. Proposed change: Policy G4 A should be revised to include reference to private gardens to read: ‘Local green and open spaces, including public and private gardens, should be protected’.

I welcome support for the creation of new areas of accessible green and open space. These provisions should be strengthened by requiring measures in Policy G4 to improve the quality of green space.
Proposed change

Policy G4 C – should read “Assessments should identify areas of public green and open space deficiency, including an assessment of deficiency in quality, taking account of Green Flag criteria, noise and air pollution, and using the categorisation set out in Table 8.1 as a benchmark for all the different types required.”
Policy G4 E 1) should include at the end ‘including an assessment of, and where appropriate a plan, to improve the quality of the space’.
The policy on noise should make explicit reference to the need to reduce the impacts of noise on green space, and other relevant policies amended accordingly. Proposed change: Additions should be made to Policy D13 Noise as follows:
Para B: Boroughs [etc] should identify and nominate new Quiet Areas and protect existing Quiet Areas in line with the procedure in Defra’s Noise Action Plan for Agglomerations and ensure local green space is improved in line with Policy G4 (as amended) including by:
taking action to reduce traffic noise around parks which are severely impacted by traffic noise and pollution, using such measures as temporary/weekend street closures and/or permanent re-routing of traffic; or introducing natural or man-made noise barriers.
The provision and improvement of green space requires funding to help deliver the Mayor’s aspirations for ‘good growth’ and increasing London’s green cover and should be addressed in Policy DF1. Proposed change: Policy DF1 D (2) should be amended to read as follows:
‘Recognise the importance of affordable workspace and culture and leisure facilities, including public green and open space, in delivering good growth.’

User: Town and Country Planning Association

Policy G4 Local green and open spaces

3.7.9 We support this policy, both in terms of its protection of open spaces, and the emphasis on taking a strategic approach to assessing the quality and quantity of open space and improving its quality and distribution where possible.

3.7.10 This assessment should be undertaken as part of the local plan evidence base and where possible build on existing assessments such as the joint strategic needs assessment, and needs assessment for recreation opportunities.

User: London Wildlife Trust

We support Policy G4 in principle, but believe it could open the door to net loss of green space – as the implicit suggestion in part B of the policy is that loss outside areas of deficiency is vulnerable to ‘needs assessments’. There is no commitment to protect all green space, plus the terms in the policy don’t align with the definitions in Table 8.1 (see comments below). We recommend that the policy should explicitly aim to secure a net gain in greenspace that chimes with the objective set out in para 8.4.3 (new provision or improved access).

We therefore suggest that the part B of the policy is amended to include a commitment to secure net gains:

B Boroughs should secure net gains in quantity and quality of publically accessible green space. The creation of new areas of publicly-accessible green and open space should be supported, especially in areas of deficiency in access to public open space.

User:	London Wildlife Trust

Para 8.4.2 should include reference to Biodiversity Action Plans, in order to ensure that the broader strategic and local ecological considerations are embedded:

8.4.2 Boroughs should undertake a green and open space needs assessment to inform their green infrastructure strategy (drawing from existing strategies such as play, trees and playing pitches, and Biodiversity Action Plans).

User:	London Wildlife Trust

Para 8.4.2 should include reference to Biodiversity Action Plans, in order to ensure that the broader strategic and local ecological considerations are embedded:
8.4.2 Boroughs should undertake a green and open space needs assessment to inform their green infrastructure strategy (drawing from existing strategies such as play, trees and playing pitches, and Biodiversity Action Plans).

User: Crest Nicholson PLC

We consider this Policy to be unsound as currently drafted and amendments are required to be effective.

Crest Nicholson largely supports this policy but consider that Part A and Part D are inconsistent with one another as currently drafted. We consider that Part A should be amended as follows:

“ Local green and open spaces should be protected in areas of deficiency. Otherwise the provisions of Part D shall apply.”

Crest Nicholson’s representation on Policy G2 contains proposals that would assist in the Mayor achieving the aims of Policy G4 and so should be referenced and considered as part of our representation on Policy G4.

User: Catalyst Housing Limited

The supporting text to draft Policy GG2 refers to delivering 50% green cover across London through, amongst other things, improvements to green infrastructure (also set out at paragraph 8.4.3 to draft Policy G4, which takes it a bit further and refers to 'more than' 50% by 2050).

It is not clear from the draft Plan or the accompanying evidence base what the current percentage of green cover is across London. As such it is not clear what level of uplift is sought through improvements, and it is therefore impossible to test whether this is realistic. We are concerned that it may not be possible to achieve a total of 50% through (say) housing developments, particularly given the range of requirements proposed to be imposed on development elsewhere within the Plan. Although we acknowledge this is not policy, the percentage should nevertheless be treated flexibly. This would have the advantage of providing critical flexibility to enable other requirements of the Plan to be satisfied, and we do not think this would compromise the green cover principles sought by the Mayor.

User:	Benhill Residents

We propose that G4 should include ‘green space on housing estates should be protected and enhanced’. The management and maintenance of these spaces are paid for through tenants’ rents and service charges rather than through council tax. A fair number are though also open to the general public. They form precious play, relaxation and gardening spaces for many low-income households that might struggle financially to access larger areas of green space outside their immediate areas.

User:	Earls Court Public Sector Tenants' Assoc

We propose that G4 should include ‘**green space on housing estates should be protected and enhanced’**. The management and maintenance of these spaces are paid for through tenants’ rents and service charges rather than through council tax. A fair number are though also open to the general public. They form precious play, relaxation and gardening spaces for many low-income households that might struggle financially to access larger areas of green space outside their immediate areas.

User:	Living Streets
We strongly support the public open space categorisation including pocket parks and linear spaces.	

User: Elaine Chambers

Policy G4 Local green and open spaces

We propose that G4 should include '**green space on housing estates should be protected and enhanced'**. The management and maintenance of these spaces are paid for through tenants' rents and service charges rather than through council tax. A fair number are though also open to the general public. They form precious play, relaxation and gardening spaces for many low-income households that might struggle financially to access larger areas of green space outside their immediate areas.

User:	Brixton Society

G4, Local Green and Open Space: Although the policy is welcome as far as it goes, we also suggest that:

• The quality of existing green space should be improved by reducing noise, light and air pollution, increasing biodiversity, and by giving stronger protection to mature trees and hedgerows.

• Outdoor sports facilities, both formal and informal, should be protected and enhanced.

• Private and public gardens, including their trees and planting, make substantial contributions to biodiversity and urban greening generally, and this should be considered in assessing development proposals.

User:	Diabetes UK

We would support this. Local green and open space allow the public to be more active and these areas should be maintained and included in planning. Opening up more areas will give people the opportunity to be more physically active. Existing green and local spaces need to have adequate communal areas, shelters, seating and focal points to attract people to them as rundown parks deter people from using them. These areas also need to be attractive to all age groups, recognise health needs and be culturally appropriate.

User:	West London River Group

Table 8.1 sets out Public Open Space categorization in 8.4.4. Under Linear Open Spaces the Thames Path and towpaths, etc are mentioned but there is no reference to the River Thames. The River Thames should be included as making a significant contribution to London’s open space.

User: Mr Paul McQuillen

I am concerned that Policy G4 contains insufficient recognition of the contribution of private gardens to the extent of green space. A policy is needed to prevent extensive ‘garden grabbing’. **Proposed change:** Policy G4 A should be revised to include reference to private gardens to read: **‘Local green and open spaces, including public and private gardens, should be protected’.**

I welcome support for the creation of new areas of accessible green and open space. These provisions should be strengthened by requiring measures in Policy G4 to improve the quality of green space.
Proposed change

- **Policy G4 C – should read “Assessments should identify areas of public green and open space deficiency, including an assessment of deficiency in quality, taking account of Green Flag criteria, noise and air pollution, and** using the categorisation set out in Table 8.1 as a benchmark for all the different types required.”
- Policy G4 E 1) should include at the end **‘including an assessment of, and where appropriate a plan, to improve the quality of the space’**.

User: Clive Prior

Private and public gardens should be protected alongside other local green and open spaces.

Policies and funding are needed to improve the quality of green space by reducing noise, light and air pollution, increasing biodiversity, and by giving stronger protection to mature trees and hedgerows.

User: Glynis Neal

Private and public gardens should be protected alongside other local green and open spaces.

Policies and funding are needed to improve the quality of green space by reducing noise, light and air pollution, increasing biodiversity, and by giving stronger protection to mature trees and hedgerows.

User:	Camden Town Conservation Area Advisory Committee

G4 A Draft policy: ‘Local green and open spaces should be protected.’

Our proposed amendments – reasoning: We welcome this policy, but seek to extend it to include public and private gardens, which can contribute to the ecological value of an area, to bio-diversity, as well as to the quality of life.

Our proposed revised text: ‘Local green and open spaces, <u>including public and private gardens</u>, should be protected.’

User: Paul Benedyk

Private and public gardens should be protected alongside other local green and open spaces.

Policies and funding are needed to improve the quality of green space by reducing noise, light and air pollution, increasing biodiversity, and by giving stronger protection to mature trees and hedgerows.

User:	The Forestry Commission
We welcome: Reference to tree strategies (8.4.2)	

User:	London Borough of Sutton

SUPPORT. The London Borough of Sutton supports Policy G4 and recognises that local assessment is required to determine the extent and value of all proposals for and against green spaces and open spaces.

User:	Jonathan Rooks

Private and public gardens should be protected alongside other local green and open spaces.

Policies and funding are needed to improve the quality of green space by reducing noise, light and air pollution, increasing biodiversity, and by giving stronger protection to mature trees and hedgerows.

User: Ealing Dean Allotment Society

Allotments sit somewhat uncertainly in the hierarchy of ‘green and open space’. Policy G4 calls for the protection of local green and open spaces, but in Policy G4 C which requires boroughs to carry out a needs assessment for such spaces, the draft plan refers to *public* green and open space, as categorised in Table 8.1. It is not clear whether the semi-public nature of allotments deems their inclusion in or exclusion from this table. In this table, Local Parks and Open Spaces and Small Open Spaces include “other areas of a specialist nature, including nature conservation areas”.

Table 8.1 should be amended to “including nature conservation areas and allotments” within appropriate categories.

Alternatively, it may be appropriate to include allotments in the category of Linear Open Spaces in the same table, as the description refers to features which may not be fully accessible to the public (although allotments are not necessarily linear). It would strengthen the protection afforded to existing allotments if they were explicitly included in table 8.1 and therefore clearly within the scope of Policy G4.

In the GLA Assembly’s own report of 2006, “A Lot to Lose: London’s disappearing allotments”, it states that 32 or 4.2% of London’s allotment sites were lost in the previous ten years and that the rate of loss of allotment plots was even higher at 6.8%. This is because allotment sites tend to be chipped away rather than lost altogether. In the words of that report: “It is this insidious loss of five plots shaved off at the periphery that is the real threat to allotment provision in London”. This kind of loss can only be prevented if there is a requirement to replace the land lost with an equivalent area of new allotments. It is not enough to compensate the loss with green roofs, tree planting or other unspecified greening measures. Financial contributions in lieu, must be adequate to purchase equivalent areas of land and banked by the local authority strictly for that purpose.

The Draft New Plan treats allotments as spaces for food growing, which is a correct but narrow definition of the purpose of allotments. They are only referred to by name on a single occasion in the draft plan and that is in Policy G8. Paragraph 8.8.1 devotes one sentence to the additional benefits - other than directly food related - that community food growing can have for social integration, community cohesion, and improved mental and physical health. It is certainly true that allotments can enhance local residents' quality of life by providing a location for healthy physical activity and social interaction but that is not all that allotments contribute. Like the various categories of public open space in Table 8.1, allotments conserve and enhance the open green environment, providing a local visual amenity, assist in combating air pollution, provide wildlife habitat and support bio-diversity. In many cases, allotments are also a heritage asset, although they are rarely given that formal status. Most have been in existence for a long time, in our own case since 1832. They can be important reminders of our social history and often conserve an element of an older landscape, in our own case former common land.

The demand for allotments continues to grow. The GLA report of 2006 showed that across London waiting lists stood at 4,300 applicants compared with 3,000 a decade earlier. In some boroughs it would apparently take ten years to get an allotment. On many sites including our own, full size plots are divided in half so that more people can gain access to them. It goes without saying that if London is to house an additional 1.9m people by 2041 the demand for allotments will only increase further. The housing target for LB Ealing is a massive 28k new homes to be built, implying an approximate 25% increase in population. By comparison to the housing section, the policies and objectives for Green Infrastructure are weak and aim at best to stand still. This huge increase in population will need more amenities and an enhanced green environment to offset the lack of private space in high density residential development. Existing provision must be given strong protection but also boroughs should be actively investigating the provision of additional land for open green areas and recreational facilities, including allotments.

The requirement to identify other potential spaces that could be used for food production, including allotments, in Policy 7.22 C of the current London Plan has been changed in Policy G8 A of the Draft New Plan, to include only sites for commercial food production. The current policy should be retained in the new plan.

User:	Persimmon Homes

The policy is unsound because it conflicts with national policy.

We concur with the HBF that the designation and protection should be a matter for the individual London Local Authorities.

User:	London Borough of Newham

Policy G4 Local green and open space

LBN are generally supportive of the policy which is complementary to Newham's Draft Revised Local Plan.

Given overlaps with policy G1, the two could be integrated. As commented under policy G1, LBN query value of separate 'green infrastructure strategies

User:	CFGN Community Food Growers Network	
	Amends	Justification
G4 Table 8.1 Page 308	Reference food growing. Land for growing food can form part of the range of activities in all categories of open space.	There is currently no mention of food growing, although many include food growing. e.g. College Green and Slip Pocket Park.

User: Blackheath Society

Policy G4 Local green and open space: We strongly welcome the policy of protecting existing and providing new local green and open space. However the financing of this and how it fits with other aspects of the Draft London Plan are far from clear. Schemes in Opportunity Areas which can appear to be developer-led in important respects (see comments on Policy SD1) and insensitive developments on small sites, particularly in conservation areas (see comments on Policy H2) can result in an erosion of local green and open space – something which needs to be discouraged through stronger policies and their enforcement.

User:	Landscape Institute London
The term ’landscape’ improvement is a more acceptable term than ‘landscaping improvement’.	

User: Landscape Institute London

LI London broadly supports this policy, although we have the following concerns:

B – How is the creation of such spaces to be supported? There is little in the subsequent clauses to clarify this.

C - Areas deficient in access to public space are also likely to be under the greatest pressure for housing and/or other development, making it even more difficult to create more public open space.

D – As above, LI London agrees that the loss of Green and Open Space (GOS) should be resisted in areas of deficiency, but notes that such loss is currently taking place. If housing densities are increased as currently proposed then the result will be that more areas of greenspace deficiency are created since it is not possible to meet the proposed densities without loss of existing greenspace and reduced provision of new greenspace, which is being squeezed out in favour of more housing units. Even if the area of open space can be retained, it will be subjected to increasing pressure from the increased population.

LI London has a related concern, where developers are trying to count leftover corner of greenspace on a masterplan, such as corners of car parks, as 'public open space' for their planning calculations, even if it is not suitable for any recreational purpose or for biodiversity. Green spaces reclaimed by community groups rely on goodwill for maintenance so may fail in the long term and local authorities don’t have funding to take on more green space when their funding is already insufficient to enable them to look after their existing sites properly. Some partnerships have been successfully set up between skilled borough staff and volunteer groups. On the other hand, the demand for housing understandably results in such incidental green space being picked off for infill development.

User:	Landscape Institute London

8.4.3 — LI London agrees that the creation of new green or open space is essential, but again question how is this to be achieved when in practice it is being lost to development, particularly housing. See Natural Capital Accounting and Urban Green Factor.

User:	Landscape Institute London

Table 8.1

• Generally: Are distances shown as-the-crow-flies or walkable?
• Gardens are included as small open spaces – presumably this doesn’t include private gardens, which are by definition not ‘Public Open Spaces’?
• Pocket Parks – What about encouraging the boroughs or permitting residents to convert unnecessary parking spaces to pocket parks or parklets?

LI London has a related concern, where developers are trying to count leftover corner of greenspace on a masterplan, such as corners of car parks, as 'public open space' for their planning calculations, even if it is not suitable for any recreational purpose or for biodiversity. Green spaces reclaimed by community groups rely on goodwill for maintenance so may fail in the long term and local authorities don’t have funding to take on more green space when their funding is already insufficient to enable them to look after their existing sites properly. Some partnerships have been successfully set up between skilled borough staff and volunteer groups. On the other hand, the demand for housing understandably results in such incidental green space being picked off for infill development.

User: The London Playing Fields Foundation

Policy G4 Local green and open space

A Local green and open spaces, **including playing fields** should be protected.

B The creation of new areas of publicly-accessible **playing fields, and**, green and open space should be supported, especially in areas of deficiency in access to public open space

C Boroughs should undertake a needs assessment of local **playing fields, and** green and open space to inform policy. Assessments should identify areas of public **playing fields and** green and open space deficiency, using the categorisation set out in Table 8.1 as a benchmark for all the different types required.

D The loss of **playing fields and**, green and open spaces should be resisted in areas of deficiency. If losses are proposed outside of areas of deficiency, equivalent or better-quality provision should be made within the local catchment area unless an up-to-date needs assessment demonstrates this is unnecessary.

E Development Plans and Opportunity Area Frameworks should:

1) include appropriate designations and policies for the protection of **playing fields and**, green and open space to address deficiencies

2) ensure that future **playing fields and**, green and open space needs are planned for in areas with the potential for substantial change

3) ensure that **playing fields and**, green and open space needs are planned in line with objectives in green infrastructure strategies to deliver multiple benefits and in recognition of the cross-borough nature of some forms of green infrastructure

The Importance of an agreed playing field definition

When defining what constitutes a playing field we feel that there should be a wider definition of playing fields so that other sports facilities such as bowling greens, athletics tracks and tennis courts are included within the playing fields footprint. This is particularly pertinent for the economic sustainability of the site in our experience and we would argue that a presumption in favour of development should also apply to the provision of ancillary facilities and floodlighting for outdoor sports facilities.

Throughout the draft London Plan we are concerned that there is a lack of reference to playing fields. One of the main weaknesses in the plan is the Open Space categorisation in Table 8.1 – Public open space categorisation. The only mention of playing fields is within the District Parks category that provides opportunities for local community provision. This hierarchy is not fit for purpose and fails to recognise the regional pan London nature of some playing field sites.

User: The London Playing Fields Foundation

We would recommend amending the text in Table 8.1 as follows:

Open Space categorisation	Description	Size guideline	Distance from homes
Regional Parks	These are large areas, corridors or networks of open space, the majority of which will be publicly-accessible and provide a range of facilities **including outdoor sports facilities and playing fields** offering recreational, ecological, landscape, cultural or green infrastructure benefits. They offer a combination of facilities and features that are unique within London, are readily accessible by public transport and are managed to meet best practice quality standards.	400ha	3.2 to8 km

We also believe that there should be another open space category added to the hierarchy entitled Playing Fields.

Open Space categorisation	Description	Size guideline	Distance from homes
Playing Fields	**These are areas of outdoor space that may have a grass or artificial surface used for sport and recreation. They can vary in size, supporting for instance one pitch in a local park up to multi pitch sites in Regional or Metropolitan parks providing opportunities for sport, physical activity and informal recreation. They can also appear as one-off sites with or without ancillary facilities.**	**0.2 ha and above**	

For this purpose, it is very important to differentiate between a site and a playing field. We agree with the Sport England definition and assume the minimum area of 0.2 hectares. The Town and Country Planning (Development Procedure) England Order 2015 defines a playing field as “the whole of a site which encompasses at least one playing pitch.” It does not differentiate between different types of ownership or use or levels of play. The order delineates a playing pitch as any marked-out area of 0.2 hectares or more recognising the importance of smaller pitches used by younger age groups.

In the work we undertook with the Mayor’s sub group in 2009 to identify a network of multi-sport hub sites across the capital, it was clear that many could be characterised as being regionally significant e.g. Hackney Marshes. We believe that there is an undeniable need to maximise usage on multi-sport sites as smaller single pitch playing fields operate at a loss and often require a subsidy. Furthermore, the recognition that ancillary facility requirements on the site, e.g. car parks, storage sheds, changing pavilions etc. form part of the physical make-up of the site should be acknowledged and agreed, as without the availability of appropriate facilities to support playing fields, use would be restricted and sports development opportunities minimised.

Playing Fields are therefore important within Regional Parks; Metropolitan Parks; District Parks and Local Parks and this needs to be highlighted in the Public Open Space categorisation.

User: London Beekeepers' Association

Comments on Policy G4

? Policy G4 A should be extended and reworded to include public and private gardens in the same way as other green spaces.

? London has an estimated 3.8 million private gardens (Chloe Smith, GiGL, 2010). These contribute an habitat loss equivalent to an area 2.5 times Hyde Park per annum. One of the main reasons is conversion of front gardens into hard standing for car parking. In addition to removing invaluable natural habitat, this practice also contributes to an adverse environmental impact on water run-off, as well as degradation of the aesthetic of the streetscape. The LBKA urge that control/prevention of this practice is made a priority to reduce further unnecessary habitat loss.

? Policy G4 D opens the door to off-setting. This is not supported, as it encourages degradation of original biodiversity. The “replacement” is very rarely like-for-like. For example, removing a large native tree and replacing with several small ones does not equal “like-for-like”. Small trees take decades to reach the carbon capture and biodiversity value of a large tree.

User: Highgate Society

G4D - Object

This should be stronger and not restricted to loss of green space in “areas of deficiency.” Loss of green space in other areas will obviously turn them into areas of deficiency. This would result in a weakening of the Ecological Green Corridors (identified in Policy G6B(1) as assets needing identification and protection) on which the viability of major and minor open spaces depend, so all loss should be resisted

User:	London Borough of Ealing

It is assumed that this policy would apply to green and open spaces designated through local policy and ‘Local Green Space’ as defined through the NPPF (paragraph 77), although it would be useful to clarify this.

User: Natural England

We support the measures in this policy to protect greenspace, create new greenspace and address deficiency in access to greenspace. However we note that the content of this policy is functionally similar to Policy 7.18 of the current London Plan (2016), and could be significantly improved in order to better reflect the objectives and proposals in the draft London Environment Strategy.

We strongly recommend that greater weight is given to the consideration of accessibility in relation to greenspace, and that when providing compensation for lost greenspace, publicly accessible, street-level greenspace should generally be provided in preference to inaccessible or less accessible areas particularly in areas deficient in access to greenspace. This is particularly important given that accessibility is vital for community involvement in greenspace management and improvement (as per Environment Strategy proposal 5.1.1f).

We support the use of bespoke green roofs where they would provide the greatest benefit in terms of ameliorating local needs for and deficiencies in ecosystem service provision, including biodiversity value, hydrological considerations, mental well-being, accessibility for play space, gardens and food growing. .

We recommend:

1) Part E.2 is re-worded to clarify that green infrastructure should be planned for in all circumstances, particularly in areas with the potential to undergo substantial change.

2) The policy clearly set out types of sites to be included in a protected greenspace network and afforded protection from development (in addition to green belt land and MoL).

3) An amendment to part D of this policy to read '*The loss of green and open spaces should be resisted in areas of deficiency. If losses are proposed outside of areas of deficiency, equivalent or better quality provision,* ***particularly in terms of accessibility,*** *should be made within the local catchment area unless an up-to-date needs assessment demonstrates this is unnecessary.'*

Please also refer to the Environment Agency’s response to this policy, particularly in regards to the potential for cross-boundary joint green infrastructure strategies.

User:	Chairs of Camden's Conservation Area Advisory Committees

G4 A Draft policy: ‘Local green and open spaces should be protected.’
Our proposed amendments – reasoning: We welcome this policy, but seek to extend it to include public and private gardens, which can contribute to the ecological value of an area, to bio-diversity, as well as to the quality of life.
Our proposed revised text: ‘Local green and open spaces, including public and private gardens, should be protected.’

User: CIBSE

We support the policy to protect London’s local green and open space in recognition of its multiple functions, including leisure and sports facilities, transport, biodiversity, flood risk management and mitigation of the urban heat island effect. In particular, we would highlight their importance in supporting the Mayor’s health and wellbeing objectives, as small but local and accessible green open space can significantly support healthy and active lifestyles. This is also important for the Mayor’s objective to reduce health inequalities, as areas with less access to green open space also tend to be those less affluent16.

See also overall chapter comment on maintenance.

User:	Historic England

An addition to the supporting text to policy G4 would assist in providing clarity as to the importance of the historic environment to London's open spaces.

Amend para 8.4.4 to read:

' …habitat creation, **enhancement of historic designs or features** , landscaping improvement or flood storage.'

User: London Friends of Greenspaces Network

13. G4 We welcome support for the creation of new areas of accessible green and open space. These provisions should be strengthened by requiring measures in Policy G4 to improve the quality of green space.

Proposed changes

• Policy G4 A – add at end: '...with a presumption against loss of part or all, or change of use'.

• Policy G4 B – add at end: '...deficiency in access to good quality public open space'.

• Policy G4 C – should read "Assessments should identify areas of public green and open space deficiency, including size and accessibility, of the relevant character eg. nature sites, sports provision and play equipment, and an assessment of deficiency in quality, taking account of Green Flag criteria, noise and air pollution, and using the categorisation set out in Table 8.1 as a benchmark for all the different types required." Add: 'All Boroughs and local Development Plans should seek to upgrade the status of all the public green spaces within the boundaries of the area, and to promote widespread adoption of the Local Green Space designation where possible, as set out in the NPPF.'

• Policy G4 A – add word to first line: '....should be resisted especially in areas of deficiency.'

• Policy G4 E 1) should include at the end 'including an assessment of, and where appropriate a plan, to improve the quality of the space'.

• Para 8.4.3 to be amended: [See also above regarding para 8.1.4]. 'In order to achieve the Mayor's target of increase of green cover/space from 48% to at least 50% of London by 2050 (a 4% increase) each borough should set specific and monitorable targets, to achieve that in their borough by 2050. Green Space Opportunity Zones should be considered, eg to apply in 'regeneration' areas, to ensure green space policies are strengthened further in those areas, especially where more homes are being built and therefore more public open space is also needed to serve that area.'

• Add new para 8.4.5. ‘Proposals in Local Plans, Development Plans, opportunity Areas etc to enshrine and enforce public access and rights to use public open spaces, whether existing ones or future ones created, will be encouraged and supported. The widespread adoption of ‘in perpetuity’ covenants eg for each borough’s portfolio of sites, through the Fields In Trust scheme, will be supported‘

• Table 8.1. Under ‘Small Open Spaces’ add: ‘...These include public gardens...’

Rationale: We support borough assessments of local green and open space to inform policy. To increase the benefits of green space, these should include an assessment of, and where appropriate a plan to improve the quality of the space i.e. an assessment of deficiency in quality rather than just amount of green space and its accessibility. Much green space is poor quality, such as noisy, poorly designed or excessive lighting. The Plan should require boroughs to enhance and manage all green spaces to a high, specified standard referencing the Green Flag criteria.

User:	Sustrans
We strongly support the policy to make new areas of green space accessible, particularly in areas of deficiency (B). Walking and cycling infrastructure will be vital to improve access in areas of deficiency.	

User:	Sustrans

Sustrans welcomes the inclusion of pocket parks and Linear Open Spaces in the categorisation of public open spaces, recognising the significant value that ‘Greenways’, canal towpaths and other green routes through the city provide.

User: Mr Chris Rose

A vz D/E highlights the schizophrenic approach driven by a fixation with growth. You either protect these places or you don't. The NPPF presumption in favour of 'development' coupled with no right of third party appeal means that in practice wildlife loses nearly every time and SINC status or even protected species other than Dodos aren't deemed 'worthy' enough to override money.

8.4.3 The creation of new green or open space is essential in helping to meet the Mayor’s long-term target of making more than 50 per cent of London green by 2050.

This should be by de-concretising and not the smoke and mirrors of claiming that turning previously private open space into public open space makes it 'new open space'.

User: Hornsey & Wood Green Labour Party

We are concerned that Policy G4 contains insufficient recognition of the contribution of private gardens to the extent of green space. A policy is needed to prevent extensive ‘garden grabbing’. Proposed change: Policy G4 A should be revised to include reference to private gardens to read: ‘Local green and open spaces, including public and private gardens, should be protected’.

We welcome support for the creation of new areas of accessible green and open space. These provisions should be strengthened by requiring measures in Policy G4 to improve the quality of green space. Proposed changes:

Policy G4 C – should read “Assessments should identify areas of public green and open space deficiency, including an assessment of deficiency in quality, taking account of Green Flag criteria, noise and air pollution, and using the categorisation set out in Table 8.1 as a benchmark for all the different types required.”

Policy G4 E 1) should include at the end ‘including an assessment of, and where appropriate a plan, to improve the quality of the space’.

The policy on noise should make explicit reference to the need to reduce the impacts of noise on green space, and other relevant policies amended accordingly. Proposed change: Additions should be made to Policy D13 Noise as follows:

Para B: Boroughs [etc] should identify and nominate new Quiet Areas and protect existing Quiet Areas in line with the procedure in Defra’s Noise Action Plan for Agglomerations and ensure local green space is improved in line with Policy G4 (as amended) including by:

1. taking action to reduce traffic noise around parks which are severely impacted by traffic noise and pollution,
2. using such measures as temporary/weekend street closures and/or permanent re-routing of traffic; or
3. introducing natural or man-made noise barriers.

The provision and improvement of green space requires funding to help deliver the Mayor’s aspirations for ‘good growth’ and increasing London’s green cover and should be addressed in Policy DF1. Proposed change: Policy DF1 D (2) should be amended to read as follows: ‘Recognise the importance of affordable workspace and culture and leisure facilities, including public green and open space, in delivering good growth.’

User: Julian Cheyne

Second, priority should be given to protecting existing open or green space. You see immediately an issue arises over the possible difference of definition between open and green space. In my case I am referring to green spaces. However, there are many spaces which are not particularly green but nevertheless are spaces for recreation and enjoyment.

Third, not only should existing green spaces be protected but there is also a need to expand existing green spaces and create new green spaces.

Fourth, particular attention should be paid to the protection of parks and to preventing organisations running parks from selling off parts of their parkland, even if they claim the land is not a 'green' space. If it is part of their parkland it should be treated as a green space and if in need of being upgraded it should be upgraded to being a green space.

User: Mr Gary Hayes

Policy G4 Local green and open spaces

We propose that G4 should include ‘green space on housing estates should be protected and enhanced’. The management and maintenance of these spaces are paid for through tenants’ rents and service charges rather than through council tax. A fair number are though also open to the general public. They form precious play, relaxation and gardening spaces for many low-income households that might struggle financially to access larger areas of green space outside their immediate areas.

User: London Parks and Gardens Trust

Many local green and open spaces are not designated heritage assets and are often at risk if not identified in Local Plans. The Trust through it's Inventory has been working hard to research and document the historic importance of these spaces as well as their social value. We endeavour to encourage local authorities to include these spaces in their Local Plans but would welcome further strengthening of this aspiration by the Mayor. The Trust would also strongly recommend the introduction of measures not only in relation to the quantum but the quality of open space and *protection of it's setting*, which the current policy as drafted has omitted.

The Trust also notes there is a tendency for new memorials to chose to be sited in public parks and green spaces. This can alter their character and detract from the recreational value and in some instances their contribution to biodiversity and the environment. The Trust urges an additional policy is introduced encouraging new memorials to be placed in areas other than local green and open spaces.

User: Mr Gary Hayes

Policy G4 Local green and open spaces

We propose that G4 should include ‘green space on housing estates should be protected and enhanced’. The management and maintenance of these spaces are paid for through tenants’ rents and service charges rather than through council tax. A fair number are though also open to the general public. They form precious play, relaxation and gardening spaces for many low-income households that might struggle financially to access larger areas of green space outside their immediate areas.

User: Sean Creighton

This is welcome. In their evidence on the Croydon Local Plan (Partial Review) and examination CTUC/CA and LNPC supported the Councils's proposed inclusion of a Designated List of Local Green Spaces.

The Planning Inspector undermined the Council's wish to include a Designated List of Local Green Spaces because the Council had not shown how each space on the proposed list met the national criteria. Evidence was submitted e.g. by LNPC on some of the spaces showing how they met the criteria, but the Inspector would not reach a compromise. When I asked the Secretary of State to require the Council to add in a Designated list, I was informed that he did not have the power to do so.

User: Andrea Carey Fuller

We propose that G4 should include ‘**green space on housing estates WILL BE protected and enhanced’**. The management and maintenance of these spaces are paid for through tenants’ rents and service charges rather than through council tax. A fair number are though also open to the general public. They form precious play, relaxation and gardening spaces for many low-income households that might struggle financially to access larger areas of green space outside their immediate areas.

The loss of green and open spaces WILL BE resisted in areas of deficieny.

User:	Oneill Homer

G4 Neighbourhood plans are the most appropriate vehicles to identify Local Green Space for protection either on its own or as part of a wider GI network as per NPPF §77, given that one of the three tests requires the Space to be special to the local community. This is not well suited to Local Plans and very few have done so.

User:	Public Health England

There is unequal access to green space across England with people living in the most deprived areas being less likely to live near green spacesxviii and ambitions on reducing inequalities and improving health outcomes for the most deprived should be considered in delivery of Policies G1, G4 and D13 Part B on green infrastructure and local green, open and quiet space.

User: YMCA

LONDON YMCA TO PROTOTYPE INNOVATIVE FINANCING/ MANAGEMENT MODELS FOR SPORTS, HEALTH AND WELL-BEING PARKS

YMCA to use expertise in recreational spaces and services to both reimagine what an outcome-based park would look like and test innovative funding mechanisms. Funding, accounting and regulatory models drive London, with parks budgets being cut (due to difficulties in accounting for non-financial value) and structural barriers to taking ownership of public spaces. YMCA will help to deliver multi-faceted social values whether through innovative land-value capture mechanisms; systems financing based on cost-reduction for the NHS or diversified spaces to provide resource-generating activities (solar powered vertical agriculture and horticulture training model).

User: Unknown

The protection and enhancement of London’s green and open spaces is welcome, and it is acknowledged that a good level of provision and a variety of space is crucial to facilitating great places in which people want to live, work and play. The consideration of green infrastructure and how green spaces can add value to the development of an area is crucial.

It is acknowledged within the draft plan that London faces some significant challenges in providing the appropriate amount and standard of development to address growing need. It must therefore be recognised that if policies relating to the protection and enhancement of green/open space are to be strengthened, there must be a necessary shift in the densities delivered and the best use of suitable development sites. Within London’s finite land area, in order to house a growing number of residents, businesses, and social infrastructure whilst hitting a target of making ’50 per cent of London green by 2050’ densities must be maximised and innovation promoted on suitable sites.

User: Support Oakfield Society

Oakfield – Green Belt – Social Infrastructure - Sport

Oakfield is a cherished Green Belt site, an important part of the borough's social infrastructure and is listed as an Asset of Community Value. In spite of this, it can be lost and lost forever unless the new London Plan strengthens its inclusive community, Green Belt and Social Infrastructure objectives. It can do this, and should do so, by insisting that boroughs must not de-designate Green Belt sites if they are being used purposively. **Policies in GG1, S1, S4, G1 and G4 should be informed by the principle, "if you use it, you won't lose it"**.

Oakfield comprises an area of largely open land primarily used as grass playing fields with 12 adult and 7 youth football pitches and 4 cricket squares. The Redbridge Sports Centre has a dozen hard surface courts and multiple health facilities. All is of a high quality, well maintained and intensely utilised. Sport England and LBR have described the grass pitches as the best in Redbridge. The whole extends to 63 acres of designated Green Belt. It is significant for the London SHLAA that the total space exceeds 25.5 hectares. (It was a mistake to include Oakfield in the housing targets in **Policy H1** and **Table 4.1** because it has not been dedesignated. This is discussed below.)

The two sports pavilions are intensively used by community and religious groups, public services, and provide venues for various social functions. In addition to the obvious contribution to the social infrastructure made by the sports organisations, the pavilions thus form a valuable place in the social architecture of Redbridge in their own rights.

Oakfield is situated very close to existing residential development and is easily accessible from Fairlop Tube Station and Barkingside High Street bus stops. It is, therefore, in a highly sustainable position.

User:	Support Oakfield Society
8.4.2 Boroughs should *[Replace with “must”]* undertake a green and open space needs assessment to inform their green infrastructure strategy (drawing from existing strategies such as play, trees and playing pitches).	

User: Highams Park Planning Group

POLICY GNE1: Designation of Local Green Space:

Development should aim to protect and enhance existing green/open spaces and the local environment. Development should also aim to:

? Provide on-site, where appropriate, new green/open public spaces or contribute to off-site projects to enhance existing public realm.
? Promote bio-diversity and nature conservation.
? Allow for the planting of new trees.

The Plan designates Local Green Space as all areas shown in the table and maps in Appendix 2. Some of these areas already have a degree of protection under Waltham Forest Core Strategy or national plans and policies. Character Assessments for the Area are included in Appendix 3. All areas in Appendix 2 will be given long term protection and any proposals for development must be solely for ancillary use of the land for recreational purposes.

Designation of Local Green Space – The Highams Park

The Highams Park is defined in this Policy GNE1 as an area of Local Green Space. The reuse, or appropriate redevelopment, of the building in the park (currently known as The Highams Park Keepers Lodge “the Lodge”) shall be allowed for uses which complement the function of the open space, such as a community hub which may include community toilets and a café.

Should the Lodge be demolished and redeveloped, any replacement development should be of a high quality design that enhances the character and respects the history of The Highams Park. The development should take into consideration the open character of the wider public space and should not exceed the footprint of the existing building.

Designation of Local Green Space – Sports Grounds

Seven non-school Sports Grounds in the Area are defined in Policy GNE1 as areas of Local Green Space:

? Rolls Sports Ground, Hickman Avenue
? Silverthorn Bowls Club, Ropers Avenue
? Jubilee Sports Ground, The Avenue
? Peter May Sports Field, Wadham Road
? Cavendish Sports Field, Cavendish Road
? Whitehall Tennis Club, Larkshall Road
? Woodford Rugby Club, Woodford New Road

The Plan supports development that results in the strengthening of these grounds as centres for sports excellence but improvements should not result in the loss of green or open space. Development will only be permitted on these sites for uses which support recreation, sporting and amenity use.

Designation of Local Green Space - Allotments

Four allotment sites are defined in this Policy GNE1 as areas of Local Green Space:

? Beechwood
? Hollywood Way
? Brookfield
? Wickham Road

Development on these sites will only be permitted for use pertaining to the horticultural activities of the allotment holders.

On 9 June 2010, the Coalition Government issued Ministerial Guidance (ref 1) with regard to Planning Policy Statement 3, which stated “the definition of previously developed land in Annex B now excludes private residential gardens”. This policy position was re-stated in the definition of “Previously Developed Land” (ref 2) in the National Planning Policy Framework, which superseded the PPS/PPG system.

The character of almost all of the Area is of family homes with mature gardens which provide habitat for wildlife and contribute to the amelioration of pollution and the effects of climate change. Our consultations show strong support for protecting such green spaces and open space.

User: Pinkham Way Alliance

The proposed New London Plan defines Open Space as
"**All land** in London that is **predominately undeveloped** other than by buildings or structures that are ancillary to the open space use. The definition covers the broad range of types of open space within London, **whether in public or private ownership** and **whether public access is unrestricted, limited or restricted**." (our emphasis).

Pinkham Way SINC is fenced from the public. The open space definition is quite specific on accessibility. A site may be completely fenced off and completely inaccessible to the public and still be classified as open space. As it happens, the public had access to the site and used it for recreational purposes up to 1994.

SP13 of Haringey Council's Strategic Plan sets out the Council's policy for Open Space and Biodiversity as "**the level of public access is not a criterion for definition. Where desirable, and where the open space in question has identifiable value, the council will resist any development that results in a net loss of this open space**"

The open space definition requires land to be **predominately undeveloped** except for buildings or structures that are **ancillary to its use as open space**,
Pinkham Way SINC is totally undeveloped and the site has been vacant for over 50 years.

User: Kingston First

As a town centre Kingston benefits from its riverside setting. The Thames acts as a linear open space providing convenient access to so me of the largest greenspaces within London; Home Park, Bushy Park and Richmond Park. Kingston has experienced first-hand the benefits that can be found in linking open spaces together, and strongly supports this approach. The wording of draft Policies G1 and G4 should be amended to place greater emphasis on the connection of these spaces and the formation of new linkages.

The town centre has very few green spaces. Kingston First actively promotes the provision of new small open spaces and pocket parks wherever possible, and the London Plan should be more explicit in expecting new development to provide useable areas of public realm.

User: Parkview International Ltd Group of Companies

Draft Policy G4: Local green and open space

It is considered that the draft policy and supporting text fails to recognise that not all local green and open spaces are publicly accessible. There are green and open spaces within London that are in private ownership and they have either never been publicly accessible or only accessible on specific occasions with the agreement of the landowner.

The categorisations in Table 8.1 make this distinction of public open space and therefore so should the supporting policy.

It is therefore recommended that draft policy G4 is amended to reflect this situation and the final supporting text also needs to make reference to publicly accessible local green and open space.

Recommended Changes to draft Policy G4

1. Publicly assessible local green and open spaces in use should be protected.
2. The creation of new areas of publicly-accessible green and open space should be supported, especially in areas of deficiency in access to public open space.
3. Boroughs should undertake a needs assessment of local green and open space to inform policy. Assessments should identify areas of public green and open space deficiency, using the categorisation set out in Table 8.1 as a benchmark for all the different types required(105).
4. The loss of publicly accessible green and open spaces should be resisted in areas of deficiency. If losses are proposed outside areas of deficiency, equivalent or better quality provision should be made within the local catchment area unless an up-to-date needs assessment demonstrates this is unnecessary.
5. Development Plans and Opportunity Area Frameworks should:

1. include appropriate designations and policies for the protection of publicly accessible green and open space to address deficiencies
2. ensure that future publicly accessible green and open space needs are planned in areas with the potential for substantial change
3. ensure that publicly accessible green and open space needs are planned in line with objectives in green infrastructure strategies in order to deliver multiple benefits and in recognition of the cross-borough nature of some forms of green infrastructure.

User: Hill and Trustees of the Gwyneth Cowing Will Trust

Enhancement of Green Infrastructure

Hill support the protection and enhancement of public green and open spaces that provide green infrastructure services and benefits to Londoner's and its environment. London's parks, gardens and designated habitats are often ecologically diverse places that provide pleasure and well-being to the surrounding community as well as helping to mitigate the effects of climate change. However, as set out in the Mayors Draft Environment Strategy, not all of London's green and open spaces provide such benefits and much of it is not publicly accessible. Hill supports enhancement of some of these spaces to unlock their potential benefits but this has to be seen within the context of a severely limited supply of land to meet London's growth requirements.

Hill support the enhancement of existing green and open spaces where they are well placed to provide benefits to communities and the environment. However, funding for this is limited as the Mayors Draft Environment Strategy acknowledged, stating that: *"an increase in green infrastructure investment will require access to new funding sources, including funding from the private sector, and better use and coordination of existing public and charitable funding streams."* The Draft Environment Strategy did not announce any major new sources of funding for London's green infrastructure.

In practice it is development that delivers substantial enhancement to the quality and accessibility of green infrastructure. New development provides the housing, workplaces and infrastructure London needs, including new high quality green infrastructure. Development projects can provide for high quality, publicly accessible green and open space and reduce AoD. The Draft Environment Strategy recognises that in areas that have been regenerated like Kings Cross rail yards and the Olympic Park, high quality green infrastructure has been provided, which has had a significant impact in reducing AoD.

The Whalebones site is an area of private open land, which has two distinctive character areas. The western part of the site has the appearance of overgrown fields and is of low landscape value. The north and eastern part of the site has higher landscape value with mature trees and hedges. These spaces are not publicly accessible and do not provide the social and environmental benefits associated with green infrastructure to the surrounding community.

Hill are concerned however, that as currently drafted Policy G1 *Green infrastructure* and Policy G4 *Local green and open space* of the Draft London Plan could prevent Barnet from allocating the site for mixed use redevelopment as they could be interpreted as an all-encompassing protection of any land which is green and open in character. It is the view of Hill that these polices could be more focussed on reducing AoD by protecting and facilitating the delivery of high quality green infrastructure, that is publicly accessible. On this basis Hill suggest the following modifications to these policies:

Policy G4 Local public green and open space

A.Local public green and open spaces should be protected.

B.The creation of new areas of publicly-accessible green and open space should be supported, especially in areas of deficiency in access to public open spaceand local planning authorities should consider allowingsome development on sites where it would facilitate an overall improvement in the quantity and quality of public open space.

C.Boroughs should undertake a needs assessment of local green and open space to inform policy. Assessments should identify areas of public green and open space deficiency, using the categorisation set out in Table 8.1 as a benchmark for all the different types required105.

D.The loss of public green and open spaces should be resisted in areas of deficiency. If losses are proposed outside of areas of deficiency, equivalent or better quality provision should be made within the local catchment area unless an up-to-date needs assessment demonstrates this is unnecessary.

E.Development Plans and Opportunity Area Frameworks should:

1.include appropriate designations and policies for the protection of public green and open space to address deficiencies

2.ensure that future publicgreen and open space needs are planned for in areas with the potential for substantial change

3.ensure that publicgreen and open space needs are planned in line with objectives in green infrastructure strategies in order to deliver multiple benefits and in recognition of the cross

User: London Borough of Camden

Criterion E (1) - This matter is not relevant solely to areas where deficiencies currently exist. Growth in numbers of residents, workers and visitors will place additional pressure on existing spaces in London. They will therefore need to be protected as a resource to address future needs. Open spaces in inner London areas such as Camden are a finite resource and it is difficult to secure significant new areas of ground level open space.

Criterion E (2) - “with the potential for substantial change” - while this is supported, the Plan should be clear that green and open space contributions should be required for all developments subject to the need they generate. This can be used to fund new open spaces or to enhance existing provision.

Criterion E (3) - Camden already seeks many of the elements set out in Table 8.2 where it is feasible to do so. It is unclear whether the approach in the Draft Plan will be effective in delivering significant levels of biodiversity gain. To be certain it will lead to more green infrastructure, the policy needs to make clear that these greening measures are additional to borough’s open space requirements. Greening measures should not be used as a substitute for development contributions which may otherwise be used to mitigate the impact of a scheme on existing open spaces.

Camden Council, through its planning policies, requires developers of all major applications to provide green roofs unless it can be demonstrated this would not be feasible or appropriate. The current London Plan states that “development proposals should wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity”. Camden has been able to establish what types of enhancement are appropriate in the borough through supplementary planning guidance, which itself has been informed by the Borough’s Biodiversity Action Plan. The package of enhancement measures will generally be proportionate to the scale of development/ size of site. Within this framework, planning officers are able to negotiate site appropriate measures. For example, on the recent Camden Goods Yard development (one of the largest schemes to be granted planning permission in recent years) the Council is securing a community managed wildflower meadow – this is equivalent to Factor 1 in Table 8.2 of the Draft Plan. There would appear to be a risk that the interim target scores set in Draft Plan Policy G5 will artificially reduce the number of enhancement measures councils will be able to achieve, as developers will benchmark against the interim standards. It would be difficult for the Council to argue there is an opportunity to deliver more on a site, if applicants can point to the Draft London Plan threshold having been met.

We also have a concern about the ability of the interim thresholds to be achieved where no green roof will be provided. On many sites, it will not be practical to provide the types of green suggested due to site characteristics. Measures such as trees and hedges (due to the site area covered) are likely to have a limited impact on the overall urban greening factors applied to a scheme. Rather than introducing, a policy requirement at this stage – which seems to give a unjustifiably high rating for amenity grassland - we consider it would be better to defer the setting of factors to the boroughs, allowing area wide circumstances to be taken into account. It would also be helpful if the policy could provide assurance that offsets, such as tree planting, in a different part of a borough to the site of the proposed scheme, comply with the statutory tests set out in paragraph 204 of the National Planning Policy Framework.

Currently boroughs can negotiate what is appropriate for a site taking into account the precise nature of the scheme, how it will be occupied and managed and circumstances of individual sites and buildings. It is vital that the urban greening factors cannot be used as a way for applicants to justify they do not need address the impact of their occupants on existing public open spaces.

User:	Alex Page

Making London greener is essential for people’s health and wellbeing. Yet many local green spaces face pressure from new development. The Plan must recognise that loss of green space cannot always be made up for through green roofs and sustainable drainage schemes, valuable though these features are (para 4.2.9). Policy should make clear that provision of and access to green space should always be considered when planning new development.

User: Camden Conservatives

LOCAL GREEN AND OPEN SPACE: POLICY G4

19. This policy fails to recognise the contribution of private gardens to the extent of green space within London. Significantly, the Draft London Plan fails to carry forward Policy 3.5 of the existing London Plan. This states as follows:

"Boroughs may in their LDFs introduce a presumption against development on back gardens or other private residential gardens where this can be locally justified."

20. The failure of the Draft London Plan to carry forward this protection against garden grabbing (or at the very least to continue to enable the discretion that the existing London Plan gives to local authorities to develop their own policies) means that the Draft London Plan is inconsistent with paragraph 55 of the NPPF. This states:

"Local planning authorities should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area"

21. Policy G4 should be amended to include the wording of existing London Plan policy 3.5.

22. There is also no definition of "green space". This needs to be provided and should make clear that it includes private gardens.

23. For all of these reasons, Policy G4 is unsound.

User: Barts Health NHS Trust

Draft Policy G4 – Local Green and Open Space

The Trust supports the general aims of the policy, not least because of the health benefits that can be achieved by ensuring that everyone has access to good quality open space.

Point D of the proposed policy says that the loss of green and open space should be resisted in areas of deficiency. Whilst the Trust generally supports this policy, it objects to the lack of flexibility in the wording; there may be circumstances where development potential could be optimised by the development on open space but where that open space is re-provided, resulting in no harm to open space provision in the area that the open space serves.

We therefore request that part D be amended to request that the net loss of green and open spaces should be resisted in areas of deficiency.

User:	Abigail Woodman

Access to green open space makes life in London worth living. With this in mind, proposals to increase green open space within London are welcomed.

User:	Abigail Woodman
Parks and green open spaces must be properly funded.	

User:	Mrs Alona Sheridan

I am concerned that Policy G4 contains insufficient recognition of the contribution of private gardens to the extent of green space. A policy is needed to prevent extensive ‘garden grabbing’. **Proposed change:** Policy G4 A should be revised to include reference to private gardens to read: **‘Local green and open spaces, including public and private gardens, should be protected’.**

User: Mrs Alona Sheridan

I welcome support for the creation of new areas of accessible green and open space. These provisions should be strengthened by requiring measures in Policy G4 to improve the quality of green space.
I propose this change:

- **Policy G4 C – should read "Assessments should identify areas of public green and open space deficiency, including an assessment of deficiency in quality, taking account of Green Flag criteria, noise and air pollution, and** using the categorisation set out in Table 8.1 as a benchmark for all the different types required."
- Policy G4 E 1) should include at the end **'including an assessment of, and where appropriate a plan, to improve the quality of the space'**.

User:	Blanche Cameron
Private and public gardens should be protected alongside other local green and open spaces.	

User:	Blanche Cameron

Policies and funding are needed to improve the quality of green space by reducing noise, light and air pollution, increasing biodiversity, and by giving stronger protection to mature trees and hedgerows.

User:	Blanche Cameron

I am concerned that Policy G4 contains insufficient recognition of the contribution of private gardens to the extent of green space. A policy is needed to prevent extensive ‘garden grabbing’. **Proposed change:** Policy G4 A should be revised to include reference to private gardens to read: **‘Local green and open spaces, including public and private gardens, should be protected’.**

User: Blanche Cameron

I welcome support for the creation of new areas of accessible green and open space. These provisions should be strengthened by requiring measures in Policy G4 to improve the quality of green space.
Proposed change

- **Policy G4 C – should read "Assessments should identify areas of public green and open space deficiency, including an assessment of deficiency in quality, taking account of Green Flag criteria, noise and air pollution, and** using the categorisation set out in Table 8.1 as a benchmark for all the different types required."
- Policy G4 E 1) should include at the end **'including an assessment of, and where appropriate a plan, to improve the quality of the space'**.

User: Carshalton-on-the-Hill Residents' Association

Policy G4A

The policy on local green spaces does not recognise the part played by private gardens. The suburban heartlands of LB Sutton support a wide diversity of plants and wildlife. Any loss would be a retrograde step. We ask that G4A is amended to **‘Local green and open spaces, including public and private gardens, should be protected’.**

User:	Mr Peter Shrubb

Policies and funding are needed to improve the quality of green space by reducing noise, light and air pollution, increasing biodiversity, and by giving stronger protection to mature trees and hedgerows. Strict guidelines are needed to govern the siting of wind farms and solar panels.

User: Federation of Enfield Residents & Allied Associations

1. **Parks and open spaces – key to community cohesion:** we support the Plan's thrust in favour of retention and enhancement of open spaces, but whilst Enfield is blessed with numerous inherited open sites, the general view in the administration is that the borough is over-parked and can afford to reassign space for development – parks are apparently non-performing assets! We suspect that, with enhanced population growth, an opportunist council will indulge in the slow browning of open sites in preparation for reassignment. If our population is to expand, as advised, from 325,000 to 400,000 over the next 15 years this view cannot be allowed to prevail, and we ask that provisions in the London Plan are strengthened to prevent this seepage.
2. **Parks need protection:** Unless parks are made subject to statutory protection, defending parks is best delegated to committed communities and residents. Parks in trust and other devices need to be formalised as priority measures. Boroughs such as Enfield are busy now developing income from their parks through commercial events and the like, in effect erecting obstacles to the communitising of these assets; a solution needs to be found that does not allow boroughs to frustrate the overarching need to preserve open spaces for all their health and economy /cultural benefits to the suburbs. The National Park City concept, now embraced by Mayor Khan, is most welcome.

User:	Teri Malakounda

Policy and funding are needed to improve the quality of our green spaces by reducing all kinds of pollution and giving stronger protection to mature trees and hedgerows.

User: Julia Palca

This policy fails to recognise the contribution of private gardens to the extent of green space within London. Significantly, the Draft London Plan fails to carry forward
Policy 3.5 of the existing London Plan. This states as follows:

“Boroughs may in their LDFs introduce a presumption against development on back gardens or other private residential gardens where this can be locally justified.”

The failure of the Draft London Plan to carry forward this protection against garden grabbing (or at the very least to continue to enable the discretion that the existing
London Plan gives to local authorities to develop their own policies) means that the Draft London Plan is inconsistent with paragraph 55 of the NPPF. This states:

“Local planning authorities should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area”

Policy G4 should be amended to include the wording of existing London Plan policy 3.5.

There is also no definition of “green space”. This needs to be provided and should make clear that it includes private gardens.

For all of these reasons, Policy G4 is unsound.

User:	Anna Schneider

London is an incredibly busy and beautiful city. Every person that visits me from other cosmopolitan cities comments on how beautiful it is that London has so many parks and green spaces. My children spend most of their day in a park close by and when I come home from a stressful day at work, the walk through the park allows me to let go of that and relax. Parks and woodland are incrediblely important especially during the digital age we live. Please show people how they matter.

User:	Frank Attwood

We are fortunate to live in such a green city, with numerous open spaces and wooded parklands. These enhance health for all and the quality of life for many. For these reasons , in spite of pressure for housing stock, I would urge that the maintenance of such resources be a key feature of the development of the London Plan.

User:	Helen de Beresford

I visited my late granny's house (or at least where it once stood before it was hit by a doodle bug in WW11) on Victoria Park Rd in Hackney last week. She came from a humble background, her mother and her siblings having endured spells in the workhouse. However she enjoyed the green space of Victoria Park immensely, especially the trees and talked of the daffodils which grew around them. Her love of this park and the surrounding trees inspired a lifelong love of nature and she gained much comfort from it after losing her mother prematurely in the war. It helped her mental wellbeing and she expressed her love of nature through poetry. I passionately believe green space is integral to our good mental health, particularly in built up urban environments.

User: Helen Mordsley

The importance of green spaces and especially trees in our city cannot be overstated. In terms of their the vital contribution to the environment, and the effect on the physical and mental wellbeing of the population they are invaluable and must be protected. I have lived in London since I was born 70 years ago and the green spaces, from large parks to tiny, hidden oases, have made London the greatest city in the world to live in. I want it preserved thus for my grandchildren to enjoy in the future. Development and building is necessary but a city is so much more than buildings.

User: Jane Knowles

i welcome a long term plan which will safeguard and extend all our urban green spaces for the benefit of all citizens. The pace of development in London is terrifying with the historic face of the city disappearing in a developer's free-for-all. The 'green spaces' in these areas often look as though they were designed to tick a box rather than provide a long term sustainable and healthy environment and I do not know how anyone or anything will thrive in some of the inhospitable concrete canyons which are being created. Trees signal an investment in a healthier future and they require a long term commitment to improving the whole environment: I hope the Mayor's plan will lead to a better future for the city and its flora and fauna.

User:	Jen Webb

Please protect the green spaces that we have left, and build more open space green places for our health and wellbeing and for those generations still to come. We can make London and the surrounding suburbs as green as possible. I think you should plant fruit trees in public areas. Not only will it provided fruit and potentially feed the poor it will also be educational and inspiring for youngsters growing up

User: South West London Environment Network

We are also concerned that the very high housing targets given to Outer London Boroughs and the requirement that a high percentage of housing be built on small sites will result in many private gardens and small spaces being built on. These often provide a haven for biodiversity and are a vital links in green corridors across the city. We would like to see G4 amended accordingly.

We are also concerned that the pressure of building excessive amounts of new housing will result in development lacking green infrastructure such as parks, food growing space, playing fields and natural play grounds as well as overloading social infrastructure such as schools, community centres and GPs.

User: London national Park City Foundation

Local green and open space - Policy G4, Page 305

1. Local green and open spaces should be protected.
2. The creation of new areas of publicly-accessible green and open space should be supported, especially in areas of deficiency in access to public open space.
3. Boroughs should undertake a needs assessment of local green and open space to inform policy. Assessments should identify areas of public green and open space deficiency, using the categorisation set out in Table 8.1 as a benchmark for all the different types required.

1. The loss of green and open spaces should be resisted in areas of deficiency. If losses are proposed outside of areas of deficiency, equivalent or better quality provision should be made within the local catchment area unless an up-to-date needs assessment demonstrates this is unnecessary.
2. Development Plans and Opportunity Area Frameworks should: 1) include appropriate designations and policies for the protection of green and open space to address deficiencies 2) ensure that future green and open space needs are planned for in areas with the potential for substantial change 3) ensure that green and open space needs are planned in line with objectives in green infrastructure strategies in order to deliver multiple benefits and in recognition of the cross-borough nature of some forms of green infrastructure.

Supporting text:

4 8.4.1 Green and open spaces – planned, designed and managed as green infrastructure – provide a wide range of social, health and environmental benefits, and are a vital component of London’s infrastructure. Although individual spaces may not provide the strategic functions of Green Belt or MOL, they are nonetheless important at the neighbourhood level, as they are the spaces which most Londoners use most often. Connectivity across the network of green and open spaces is particularly important as this provides opportunities for walking and cycling and for improving wildlife corridors.

8.4.2 Boroughs should undertake a green and open space needs assessment to inform their green infrastructure strategy (drawing from existing strategies such as play, trees and playing pitches).

8.4.3 The creation of new green or open space is essential in helping to meet the Mayor’s long-term target of making more than 50 per cent of London green by 2050. New provision or improved access should be particularly encouraged in areas of deficiency in access to public open space. It will also be important to secure appropriate management and maintenance of open spaces to ensure that a wide range of benefits can be secured and that any conflicts between uses are minimised.

8.4.4 Proposals to enhance green and open spaces to provide a wider range of benefits for Londoners will be encouraged. Examples could include improved public access for all, inclusive design, recreation facilities.

User:	Primrose Hill Conservation Area Advisory Committee

G4 A Draft policy: ‘Local green and open spaces should be protected.’

Our proposed amendments – reasoning: We welcome this policy, but seek to extend it to include public and private gardens, which can contribute to the ecological value of an area, to bio-diversity, as well as to the quality of life.

Our proposed revised text: ‘Local green and open spaces, <u>including public and private gardens,</u> should be protected.’

User: Carole Destre

Making London greener is essential for people’s health and wellbeing. Yet many local green spaces face pressure from new development. The Plan must recognise that loss of green space cannot always be made up for through green roofs and sustainable drainage schemes, valuable though these features are (para 4.2.9). Policy should make clear that provision of and access to green space should always be considered when planning new development. And I mean proper green space, not a tiny 'playground' (as per the one on the Royal Arsenal Riverside development, which is as large as a handkerchief with its three apparatus, just to tick the box 'playground! It is a shame on the developer and the council to have approved this).

User:	Colin Gillespie

Making London greener is essential for people’s health and wellbeing. Yet many local green spaces face pressure from new development. This should be CONTROLLED.

User: David Scott

Making London 'greener' is vital for the health and wellbeing of everyone who lives and works here. So why do so many of the Capital's green spaces face pressure from new development? This should not be allowed to happen, and your plan must recognise that loss of green space cannot possibly be made up for with green roofs and sustainable drainage schemes, valuable and necessary though these features are (para 4.2.9). They should be in addition to, not instead of, loss of green spaces to development.

Policy should make clear that provision of and access to green space should always be considered when planning new development.

User: Helen Newman

Making London greener is essential for people’s health and wellbeing. Yet many local green spaces face pressure from new development. The Plan must recognise that loss of green space cannot always be made up for through green roofs and sustainable drainage schemes, valuable though these features are (para 4.2.9). Policy should make clear that provision of and access to green space should always be considered when planning new development. It is well documented that green spaces help our mental health so any new accommodation should be reflected with adequate green space. Flats could be told to include balconies for plants and I have seen some with plants already potted into the structure. London is a great city if cutting edge artists and engineers, when don’t you use these expertise to create ground breaking green spaces. Spaces that inspire the next generation. Who will, we hope and plan and fight and recycle and reuse, breathe cleaner air, live longer, have children with fewer breathing problems, utilise the renewable energy you installed. What a legacy, Sadiq Khan, who inspired London and the world to think greener, outside the box.

User:	Helen Newman

Lastly, can we put grass back in places where we took it out? I’m thinking of tramlines that have grass between them, no parking zones with plants in, if emergency service need t park there, they can and after the plants will rejuvenate. Mean while giving the community air to breathe, wildlife to admire and space for their heads and hearts. Thanks for reading and I dream of a green London to be proud of.

User: Joanna Dickerson

I believe that everyone in London has the right to breathe clean air, have access to nature and to benefit from clean energy, Green Spaces & Nature.

I live in the Kennington Road backing onto Walcot Gardens. A new development approved by Lambeth Planning has been given the go ahead, despite it's creation meaning the loss of several mature trees in what is currently a green oasis and building a 2 storey house in what has always been a garden. A mews development also means a further loss of mature trees.

This development, in a conservation area received over 100 passionate complaints backed up by strong evidence siting all the numerous examples of laws being broken, all of which were ignored in the quest for more housing.

These plans fly in the face of numerous Lambeth laws and Lambeth Conservation laws none of which have been acknowledged.

When plans like this are approved I will view all these greener London plans with the greatest suspicion seeing them simply as someone wanting to look good on paper. We are being fobbed off with a concreting over a garden space (currently filled with wildlife) and a house with a green roof replacing mature trees and threatening the lives of existing trees.

User:	Juliet Hobday

Making London greener is essential for people’s health and wellbeing. Yet many local green spaces face pressure from new development. The Plan must recognise that loss of green space cannot always be made up for through green roofs and once the space has gone you never get it back.

User:	Nick Horgan

Making London greener is essential for people’s health and wellbeing. Yet many local green spaces face pressure from new development. The Plan must recognise that loss of green space cannot always be made up for through green roofs and sustainable drainage schemes, valuable though these features are (para 4.2.9).

User:	Regent's Park Conservation Areas Advisory Committees

G4 A Draft policy: ‘Local green and open spaces should be protected.’

Our proposed amendments – reasoning: We welcome this policy, but seek to extend it to include public and private gardens, which can contribute to the ecological value of an area, to bio-diversity, as well as to the quality of life.

Our proposed revised text: ‘Local green and open spaces, <u>including public and private gardens</u>, should be protected.’

User:	Alison Shepherd
I live in Enfield and appreciate the green spaces in the borough and especially the Green Belt.	

Policy G5 Urban greening

User:	Kerstin van Eckert

- Policy G5. Urban greening. I support this policy, including the recommended Urban Green Space Factor, and subsequent narrative that mentions the important role of trees. I support the inclusion of the role and weighting for woodland and trees in Table 8.2 - Urban Greening Factors. I recommend including a reference to Residential Development and Trees (Woodland Trust, 2015, woodlandtrust.org.uk/residentialdevelopments).

User:	Sue Abel

- Policy G5. Urban greening. I support this policy, including the recommended Urban Green Space Factor, and subsequent narrative that mentions the important role of trees. I support the inclusion of the role and weighting for woodland and trees in Table 8.2 - Urban Greening Factors. I recommend including a reference to Residential Development and Trees (Woodland Trust, 2015, woodlandtrust.org.uk/residentialdevelopments).

User:	Janet Whitehead

Policy G5 promotes maximising urban greening but this policy makes no mention of back gardens and ignores their contribution to health, amenity and habitats. Urban greening cannot compensate for the loss of gardens that have been built on. The presumption against development in back gardens has been lost - this is contrary to national policy which excludes garden land from the definition of previously developed land.

User:	Ms Margo Clark

I support this policy, including the recommended Urban Green Space Factor, and subsequent narrative that mentions the important role of trees. I support the inclusion of the role and weighting for woodland and trees in Table 8.2 - Urban Greening Factors. I recommend including a reference to Residential Development and Trees (Woodland Trust, 2015, woodlandtrust.org.uk/residentialdevelopments).

User: Eastcote Conservation Panel

Elsewhere in this draft plan there is great emphasis placed upon green roofs [this after existing gardens have been built on] For a building to have a green roof/roof garden it has to be flat. Therefore, the Mayor is proposing one style of building across the board, which will be cuboid in shape but with varying heights. This is not good design and will not enhance any ancient village or Metroland Town.

The loss of biodiversity by building on land that was once a garden cannot be replaced by the proposal of having green roofs/walls and extra street trees. Green roofs are expensive toinstall and costly to maintain. Green walls are even more difficult to maintain and will use a considerable amount of water, which will be a waste of a precious commodity.

It must be stated again that green roofs/walls/roof gardens/extra street trees are not a substitute for gardens. Gardens bring many advantages for biodiversity, flood risk control, improved air quality etc., which the above proposals cannot bring.

The comments put forward by LBH should be accepted.

Just one addition, the proposal for Green Walls will add significantly to water use to keep these structures flourishing. They should be omitted from the plan as they will not achieve the desired effect of improving air quality, instead will be a waste of water.

User:	Mr & Mrs Mark & Elena Herbert

Urban greening. I support this policy, including the recommended Urban Green Space Factor, and subsequent narrative that mentions the important role of trees. I support the inclusion of the role and weighting for woodland and trees in Table 8.2 ? Urban Greening Factors. I recommend including a reference to Residential
Development and Trees (Woodland Trust, 2015, woodlandtrust.org.uk/residentialdevelopments).

User:	Joan Taplin

Making London greener is essential for people’s health and wellbeing. Yet many local green spaces face pressure from new development. The Plan must recognise that loss of green space cannot always be made up for through green roofs and sustainable drainage schemes, valuable though these features are (para 4.2.9). Policy should make clear that provision of and access to green space should always be considered when planning new development.

User: Arnab Datta

Policy G5. Urban greening. I support this policy, including the recommended Urban Green Space Factor, and subsequent narrative that mentions the important role of trees. I support the inclusion of the role and weighting for woodland and trees in Table 8.2 - Urban Greening Factors. I recommend including a reference to Residential Development and Trees (Woodland Trust, 2015, woodlandtrust.org.uk/residentialdevelopments).

User:	Kathleen Towler

Policy G5. Urban greening. I support this policy, including the recommended Urban Green Space Factor, and subsequent narrative that mentions the important role of trees. I support the inclusion of the role and weighting for woodland and trees in Table 8.2 - Urban Greening Factors. I recommend including a reference to Residential Development and Trees (Woodland Trust, 2015, woodlandtrust.org.uk/residentialdevelopments).

User: London Assembly Planning Committee

Recommendations Policy G5 should be applied to all developments, not just major developments. The Urban Greening factor (UGF) of 0.4 for residential developments should be strengthened to 0.8, or it will not have any impact, and may result in loss of biodiversity. Policy 3.5 from the existing London Plan should be retained, if necessary in a form that makes it more effective in the context of permitted development rights. The current Mayor should refer to the Environment Committee's recommendations, made to the previous Mayor, that some London-wide resource of biodiversity expertise be provided or facilitated for boroughs to help them assess planning applications.
9.9 The Deputy Mayor told the Environment Committee that protections for green space are still strong, especially around designated sites such as Metropolitan Open Land and the Green Belt. He said that protections have in fact been strengthened around small sites.
9.10 The Environment Committee welcomes the continuation and strengthening of protections for green space in the Plan. However, the plan still envisages a large expansion of London's population and economy. This will involve very significant redevelopment and new building, so there will continue to be pressure on green infrastructure and the natural environment. Therefore, the committee wishes to look carefully at the detail of the protection for green infrastructure from different kinds of development, and the other policies for enhancing the benefits and accessibility of green infrastructure.
9.11 Green spaces, including small open spaces, pocket parks and gardens, need greater protection, particularly in the following policies:
• Policy G4 Local green and open space
• Policy G5 Urban greening
• Policy H2 Small sites
9.12 Policy G4, 'Local green and open space', is applicable only to smaller developments.
9.13 Policy G5 applies to large developments. We welcome the UGF, especially in areas of green infrastructure deficiency. However, the policy does not apply to smaller developments.
9.14 However, policy H2 is also applicable to many smaller developments and it establishes a presumption in favour of developments of up to 25 homes which meet criteria including infill, extension and building over gardens on vacant and underused sites, and sites near to transport links or town centres (policy H2 D). The presumption applies when the developments meet a design code developed in accordance with policy H2 B (which makes reference to increased housing density but not to protecting green space) or, if there is no such code, when the benefits of additional housing provision outweigh the harm to biodiversity, even if that level of harm is at first sight unacceptable (policy H2 E). There also remains a nationally-imposed permitted development right to take up to half of a garden to extend a dwelling.
9.15 With this presumption in favour of small developments, which are exempt from the UGF, and with the expectation that the rate of delivery of housing on small sites will double (policy H2 A and table 4.2), there is a heavy burden on policy G4 D to protect local green spaces against

infill development, extension, ‘garden grabs’ and other forms of housing densification. This is increased by the loss of policy 3.5 in the existing plan, which says:

“Boroughs may in their LDFs introduce a presumption against development on back gardens or other private residential gardens where this can be locally justified.”80

9.16 The Environment Committee heard that the effect of the Draft Plan would be that there should be no net loss of green cover in these cases, but that green space such as gardens might be replaced by other forms of green cover such as green roofs. It heard that the previous policy 3.5 was ineffective because of the permitted development right, at least in the case of extensions. We also heard that the Draft Plan would encourage boroughs to resist the loss of small open and green spaces, but that the Deputy Mayor for Planning, Regeneration and Skills, Jules Pipe, could not be sure that this encouragement would be successful.

9.17 If green spaces such as gardens (with UGFs between 0.4 for regularly mown lawns and 0.8 for trees in natural soil) can be replaced by green roofs (with UGFs as low as 0.3 for lightweight systems), there is a risk that the environmental benefits of green space, and access to it, will be reduced even if the area of cover is not.

9.18 In support of this concern, the Planning Committee heard from the London Wildlife Trust that further loss of gardens would have a negative effect on biodiversity. The same meeting heard that there was a lack of biodiversity expertise in the planning process at the local level, with 18 per cent of applications impacting biodiversity, but only one per cent being scrutinised for those impacts.81

User:	Bromley Friends of the Earth

Housing Quality and Standards [policy D4]

The development of garden space will have a profound impact on the character of suburban outer London. It runs counter to the idea of ‘urban greening’ espoused in policy G5.

User: Mr Benjamin Lansbury

I support this policy, including the recommended Urban Green Space Factor, and subsequent narrative that mentions the important role of trees. I support the inclusion of the role and weighting for woodland and trees in Table 8.2 - Urban Greening Factors. I recommend including a reference to Residential Development and Trees (Woodland Trust, 2015, woodlandtrust.org.uk/residentialdevelopments).

User:	London Borough of Lambeth

Lambeth supports the use of the urban greening factor approach in principle and welcomes the opportunity to develop an UGF tailored to local circumstances, although this will have significant resource implications for boroughs. Careful implementation will be essential to ensure this does not become a tick-box assessment by developers – resulting in erosion of quality and green infrastructure value. The most important principle to be upheld is the different value levels of different types of green infrastructure. Ultimately, nothing can fully replace green open space for the value it contributes to quality of life and health and wellbeing. To work effectively, the UGF approach will require ongoing input by specialist officers plus training for development management officers. Again, this will have a significant resource implication for boroughs, that will need to be planned into service delivery and will therefore require an appropriate transition period prior to implementation. The policy wording needs to make much clearer how quality will be assured and maintenance secured. See also the comment under monitoring in Chapter 12.

User: British Land

Urban Greening (Policy G5)

36. Policy G5 introduces a formula based system for identifying an appropriate amount of ‘urban greening’ required in new developments. This is based on site area vs type of coverage (permeable vs impermeable etc). Urban Greening is identified as including a wide range of options including, but not limited to street trees, green roofs, green walls and rain gardens.

37. British Land supports the principle of sustainable development and over the past 30 years has actively pioneered and delivered some of the most sustainable and ecologically positive schemes in London which have resulted in numerous industry awards. However, British Land holds significant reservations on this policy as currently drafted. An Urban Greening Factor (UGF) of 0.4 for residential developments and 0.3 for commercial developments may be achievable in suburban locations but will not be feasible in higher density developments or opportunity areas given the scale of delivery envisaged by the draft London Plan. A figure of 0.2 for all development would be a more appropriate figure and would be more onerous than BREEAM Excellent.

38. There is no suggestion of what will happen should the formula target be missed but it may be expected boroughs could treat this like the carbon offsetting targets and seek contributions in the absence of sufficient greening. This could have result in a further and significant financial burden on development and add to the challenges of scheme viability. The unintended consequence of applying this extra cost on development will be for less development to proceed, and if it forces rent levels to rise that will make London less competitive in a global market place at a time when London is keen to promote itself as being ‘open for business’ in a changing and increasingly competitive world.

User: Canary Wharf Group

Draft policy G5 sets out a suggested approach for boroughs to develop an UrbanGreening Factor (UGF). While we note that the guidance set out in Table 8.2 and theUGF of 0.4 for residential developments and 0.3 for commercial developments are setout as suggested starting points for boroughs based on three case studies (two domesticand one commercial), this is not representative of the range of development types inLondon. Furthermore, hotels, industrial and mixed use schemes have not been testedand therefore the target UGF figures have not been robustly assessed.

In addition, the boundaries used to determine the example figures are not representativeof the plot/site boundary and seem to be arbitrary depending on the building, with nosurrounding public realm included. By its very nature, surrounding public realm tends toincorporate more hardstanding which will reduce the deliverable UGF figures. Existingcentral London projects with terraces, green roofs and extensive landscaping have beenfound to deliver UGF values of between 0.11 and 0.17, meaning that it would be highlyimpractical to achieve the target values quoted in the policy. Clearly if surroundinglandscaping in suburban locations is taken into account then the figure becomes muchmore achievable.

The calculation methodology also fails to take account of areas of a building wheregreen infrastructure is impractical e.g. sloped or mansard roofs / areas that are restricteddue to a listing or conservation area restriction / areas that are designated as amenityspace e.g. terraces. If implemented, guidance and allowances would need to be madefor areas such as these. Would a separate factor also be provided for blue roofs, similarto that proposed for permeable paving, even though it serves no purpose to improveurban greening?

In addition, we have reservations regarding the type of greening that this policy willdeliver. The Draft London Plan already contains policies relating to biodiversity, trees,access to open space and flood risk mitigation, covered elsewhere in the plan, so theadditional benefit policy G5 will confer on London is questioned. There is a risk that the‘greening by numbers’ approach will create a focus on the quantity of urban greeningwithout due consideration of the quality, setting or purpose. Especially in city centresites, the policy could lead to more sedum roofs being installed rather than havingquality green space, such as an intensive green roof covering less of the site but ofmuch higher quality.

Although the supporting text for the policy states that the values are only arecommendation and that each borough develops its own approach in response to itslocal circumstances, this is unlikely to occur in practice and there is a risk that boroughswill simply adopt the quoted targets with no regard for flexibility of use or density.

Such a policy is therefore over prescriptive, does not take into account site specificcircumstances and it should be at the Development Management level that schemes arescrutinised to make sure that they are maximising the use of landscaping, green roofsetc. Part A of the policy provides an appropriate strategic basis for this. Part B of thepolicy is not however justified and should be deleted.

User: Better Bankside Business Improvement District

Policy G5 within the New London Plan sets out a robust proposal relating to the implementation of urban greening measures for new developments. While Better Bankside generally supports the inclusion of the Mayor's 'Urban Greening Factor' as a useful tool for developers and Local Authorities, we suggest that the approach could be refined through greater scenario testing to ensure that quality, and quantity of Urban Green infrastructure needed to support growth and a resilient city are achieved.

Having planted over three hundred streets, and delivered over 5,000m2 urban greening within the Bankside neighbourhood, Better Bankside have evidential experience into the effectiveness of green interventions within the urban setting.

Better Bankside echo the London Plan's policy assertion that the use of green infrastructure must play an integral role in meeting the City's sustainability aspirations and support Policy G1.

Better Bankside also welcome the various social and environmental benefits to integrating green infrastructure within the urban setting that have been acknowledged within the draft policy. Better Bankside would appeal to Local Plans to set minimum standards to development proposals to ensure that the potential benefits of green infrastructure are captured and maximised.

Better Bankside have implemented a range of green infrastructure interventions including green roofs, green walls, tree planting, and other on street green interventions. Green infrastructure in Bankside helps support the attractiveness of the area, supporting growth and delivering environmental and economic services. Additionally, Better Bankside employs an Urban Gardener via an apprenticeship initiative and organises a Gardening Club with its business members that allow people to engage directly with the green infrastructure in the neighbourhood. This capitalises on the wellbeing benefits of interacting with nature and encourages stewardship over public spaces.

User:	London Borough of Haringey

The Council generally supports this policy, and encourages the Greening of London, in an attempt to achieve the Mayors target of 50% green cover across the City.

User:	London Borough of Barking & Dagenham

The Council support the principles within draft London Plan policy G5-*urban greening.* However, at G5-A the policy should set out that urban greening must benefit biodiversity. The Council also welcomes G5-B, where the policy states boroughs should develop an ‘Urban Greening Factor’ to identify the appropriate amount of urban green requirement in new developments. The ‘Urban Greening policy is welcome. However, it may result in large areas of hardstanding such as car parks with no soft landscaping. There needs to be a caveat that prevents this, possibly by requiring urban greening to be inter connected on and off sites.

User: London Borough of Lewisham

We are broadly supportive of G5 and believe that this could be a relatively rudimentary but useful tool to assess the merit of green proposals in development schemes.

We feel that this additional consideration could lead to a more protracted planning application process (as D2 above). Further guidance on how London Boroughs should implement this policy at the local level would be appreciated.

Further consideration should also be given to:

- How UGF will be monitored.
- How urban greening will be balanced against the need to develop new homes, jobs and services. If applied rigidly, target UGF scores may make it difficult to approve development proposals which are otherwise appropriate and suited to their local context.

How UGF should be applied whilst tailoring it to local circumstances in order to avoid standardised surface cover across the borough.

User: Environment Agency

We strongly support this policy, including the requirement for Boroughs to develop an Urban Greening Factor (UGF), (Table 8.2). We consider that it will bring multi-functional benefits, improving London's resilience, such as reduced flooding events. It will in our view, provide further certainty for developers, which can be accounted for from the earliest stages of land acquisition and development design.

Recommendation:

G5. Given that the Plan places emphasis on the contribution of small sites (1-25 units) to housing delivery, we recommend that the policy and text should identify:

- Default expectations for urban greening on smaller sites until such time as boroughs develop and adopt their own models of delivery. This will ensure that smaller sites continue to offer a contribution to 'greening' London, and to the Mayor's policy targets.
- Encourage boroughs to collaborate strategically to identify joint approaches to urban greening, particularly in locations which rely heavily on the contribution of small sites to meet housing targets.
- Review the policy and text against key objectives of the Government's 25 year Environment Plan, referencing net environmental gain and a natural capital approach.

User:	Environment Agency

We note that it is the intention to apply the UGF to major development proposals initially, until such time as boroughs develop their own models. Whilst welcoming the introduction of a UGF, in our view this could leave a policy ‘gap’ in regards to non-major sites (our comments above on Policy H2 refer). We consider that it would aid Plan delivery, to identify and apply a ‘default’ approach at London Plan level to ‘greening’ smaller development sites, until boroughs are able to develop their own work.

User: Environment Agency

We also welcome the inclusion of the explanation of the UGF at Para 8.5.4, which provides further clarity for development plans and developers. Policy G5 will also support the Mayor's draft Environment and Economic Development Strategies, which recognise the role of natural capital in supporting environmental and economic resilience. This approach has the potential to support approaches to natural capital and net environmental gain as set out in the Government's 25 year Environment Plan. Within the 25 year Plan, natural capital evaluation will be developed as a tool to support economic growth and development.

It may be helpful to add encouragement in explanatory text for neighbouring boroughs to work collaboratively on developing joint green space strategies. This may be particularly useful for those boroughs which rely heavily on small sites to meet the Plan's housing targets, and for those where delivering strategic green infrastructure is needed to support growth. Natural England's response also refers.

User:	Environment Agency

Currently ‘rivers and streams’ are not identified in the table under surface cover type. Consequently their restoration, and de-culverting as supported elsewhere in the Plan’s waterways policies, and by the Mayor’s draft Environment Strategy, is likely to be under-valued in development plans and proposals

Recommendation:

Table 8.2. Please add in in ‘…, **including river and stream restoration.**’ under the category for’ Wetland and open water created on site’.

User: London Borough of Brent

The Council supports this policy.

The Urban Greening Factors provided in Table 8.2 give equal weight to trees and green roofs, but trees should be given greater weight. Green roofs, whilst welcome, do not provide the same benefits as trees because they are invisible from street level and have less benefit in countering pollution, wind and the heat island effect.

Amend Policy G5A to:

"Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. New streets and spaces should include suitable trees."

User:	London Borough of Bromley

The introduction of this policy is cautiously welcomed. However, urban greening should not be relied on to offset the loss of open space, including private gardens. The Policy introduces a requirement for Local Authorities to apply the generic Mayoral Urban Greening Factor to major applications. The Council welcomes the opportunity to consider developing its own local urban greening factor which may be applied to applications below the threshold, responding to local circumstances.

User: London Councils

This policy is welcomed, including the introduction of the urban greening factor. It should however note the importance of avoiding invasive non-native species in the context of increasing greening, which are a significant global and national driver of biodiversity decline.

Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as highquality landscaping (including trees), green and brown roofs, green walls and nature-based sustainable drainage. Greening should contribute to local and national biodiversity objectives and air quality through appropriate choice of species, and should comply with legislation relating to avoidance of invasive nonnative species.

This section highlights that green infrastructure should be seen as integral to new developments rather than an ‘add-on’ due to the social and economic benefits it can provide.

User:	Orpington Field Club

Policy G5 A: line 3 '..high quality landscaping (including trees)'. Suggest insert with a minimum of 50% native planting. Reason: because native plants support more invertebrates than non-native plants and therefore more birds and bats and contribute to UK biodiversity targets

User:	London Borough of Tower Hamlets

The new and innovative approach to quantifying required greening is supported. However, there is a risk that it creates a ceiling rather than a floor for provision by developers – the policy must not undermine boroughs' ability to secure more than baseline provision for a site. In addition, further guidance is required on the urban greening factor, its weighting criteria and application.

Scoring criteria should also be included for the post development stage to ensure maintenance.

The scores given to the different green elements should be clarified. It is not clear why intensive green roof score more than perennial planting, when these are effectively the same habitat at different levels? Why are hedges so low? What area is being measured for a green wall – the vertical or horizontal? And why should semi-natural vegetation or wetland have to be "created" on site rather than retained?

User:	Royal Borough of Kingston

Generally support. However, note that it is unclear whether the achievement of the Urban Greening Factor (UGF) is a target or requirement, as different wording is evident in the policy. It is also unclear whether the boroughs can set a UGF policy for all developments or just major development. Clarification is sought on both matters. It is not known how individual boroughs could establish a specific UGF and guidance would be welcomed.

User: Save Swiss Cottage

URBAN GREENING: POLICY G5
24. We support this policy, subject to the two important caveats identified below:
25. First, the policy should be amended to make clear that “urban greening” features, such as green walls and ground cover planting) should be provided in addition to the new areas of publicly-accessible green and open space which are supported by Policy G4.
26. Second, the definition of “urban greening” states that “green roofs” and “soft landscaping” are the most appropriate elements of green infrastructure. This is not justified. It suggests that green roofs should be preferred over gardens, notwithstanding that the visual and biodiversity benefits of the latter (and the problems of maintaining green roofs) are well known. Just as importantly, it is wholly inappropriate to hide away a hierarchy of “urban greening” types in the glossary to the plan. If the Mayor intends to include a policy
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preference in favour of green roofs over other forms of green infrastructure, he should say so in the policy itself.
27. For all of these reasons, Policy G5 is unsound.

User:	London Borough of Waltham Forest

We agree with this policy and the principle behind using a metric such as the Urban Greening Factor. However, its implementation will be competing against other planning obligations such as affordable housing delivery and infrastructure delivering including contribution to Mayoral CIL. We consider there may be some difficulties, financially, in delivering this policy.

User:	London Borough of Hillingdon

The Council supports the policy on Urban Greening and welcomes the direction provided. The erosion of urban greening has significant impacts for Hillingdon and the Council welcomes the direction taken. It is particularly important given that the intensification of development places extreme stress on existing urban green cover.

Table 8.2: Urban Greening Factors could be clearer in the explanation of the different 'Surface Cover Types'. These could be colour coded into groups to highlight
the variation in factors.

User:	Marion Lerminiaux

Making London greener is essential for people’s health and wellbeing. Yet many local green spaces face pressure from new development. The Plan must recognise that loss of green space cannot always be made up for through green roofs and sustainable drainage schemes, valuable though these features are (para 4.2.9). Policy should make clear that provision of and access to green space should always be considered when planning new development.

User:	London Borough of Merton

The statement on urban greening in 8.5.2 appears inconsistent with the definition of urban green provided in the glossary and requires clarification / correction.

User: London Borough of Merton

Support with amendments to improve effectiveness and delivery This new policy refers to Urban Greening Factor (UGF) as the tool to be used for urban greening. However UGF is not defined in the glossary and instead there is a definition of Green Space Factor (GSF), which appears to have been taken from the Ecology Consultancy Report provided as part of the evidence base. As GSF is not referenced at all in the new plan (apart from referencing the report), this seems to be a mistake in the glossary.

The definition of Urban Greening specifically refers to “green infrastructure elements that are most applicable in central London and London’s town centres.” This conflicts with Parts A and B of Policy G5 which refer to “major development proposals” and “new developments” respectively. Is this policy only applicable to Central London and town centres, or major developments, or all new developments?

While supporting para. 8.5.3 acknowledges that “The UGF is currently only applied to major applications, but may eventually be applied to applications below this threshold as boroughs develop their own models” this needs further clarity as the Ecology Consultancy evidence report recommends that “all developments should deliver additional greening”.

Are the recommended target scores mentioned throughout Policy G5 a minimum requirement? By setting a minimum standard, there is a risk that applicants will only try to provide on site urban greening to this minimum score without attempting to exceed it, even if a site is capable of providing more. This should be clarified in the supporting text.

User:	London Borough of Hackney

Hackney supports the introduction of the Urban Green Factor as a tool to assist in identifying the appropriate amount of urban greening required in new developments. A degree of flexibility is required to ensure that the tool can be adapted to local circumstances to meet local needs. Considerations might include:
- how the Urban Green Factor works alongside Hackney's local policy requiring a specific quantum of communal amenity open space per person in major schemes;
- how such green infrastructure is maintained;
- a mechanism whereby some developments could contribute to green infrastructure in the wider public realm to ensure that greening is not contained only to the developments themselves but also benefit nearby streets, for example, if there is no space for SUDS on site, perhaps some could be funded on a nearby street.

User:	London Borough of Hounslow
LB Hounslow broadly supports this policy approach.	

User: Westminster City Council

Whilst the emphasis on new developments contributing to green infrastructure provision is supported, and some flexibility is offered for boroughs to define their own urban greening factor, the approach outlined here is an overly complex and mechanistic tool to optimise green infrastructure on site. It is unclear how the factors applied to different surface cover types has been determined, and there is a lack of recognition within policy that some options such as green walls will need a significant amount of post occupancy management and maintenance, which will directly impact on how beneficial provision will be in the long term. In practice it is likely that there will need to be trade-offs between different types of greening, and between greening and other matters (such as installation of photovoltaic cells). Boroughs can already set simpler minimum requirements to secure new green infrastructure, catered to local circumstances.

A better and more effective approach might be to set targets for greening and putting the detailed methodology in supplementary guidance as one means of delivering them.

It may be worth making clear that the Royal Parks will fall within the “regional parks” category in table 8.1.

User:	Lesley Halliday

Urban greening. I support this policy, including the recommended Urban Green Space Factor, and subsequent narrative that mentions the important role of trees. I support the inclusion of the role and weighting for woodland and trees in Table 8.2 - Urban Greening Factors. I recommend including a reference to Residential Development and Trees (Woodland Trust, 2015, woodlandtrust.org.uk/residentialdevelopments).

User: London Borough of Southwark

The council supports the introduction of the Urban Greening Factor.

The New Southwark Plan requires major development to provide green infrastructure and policy G5 provides a mechanism to quantify that contribution. It is assumed that the final sentence of G5 B is intended to set a target score to be achieved up until boroughs set their own targets. If that is the case it would be improved by making a clear statement that development should meet this target. The current wording is unclear.

For urban greening to deliver effective green infrastructure and to be consistent with policy G1, policy G5 should be amended to require that greening is designed to deliver multiple benefits and will be managed for the long-term.

The policy should require any trees in the development to be planted in such a manner that will not create areas that would hinder the dispersion of pollution. With any green infrastructure, there should be an obligation for the proper maintenance and any necessary replacement of it for a number of years after the development is completed.

User: London Borough of Wandsworth

Supportive, however the functionality of Urban Greening Factor would need to be trialled and assessed to see if it suitable for Wandsworth. The wording in paragraph 8.5.1 is stronger than the policy wording. The policy wording should be strengthened to reflect this e.g. “G5A Major development proposals should ensure GI is integral to site planning and building design as it is fundamental to the greening of London. This can be achieved by incorporating measures such as highquality landscaping (including trees), living roofs, living walls and naturebased sustainable drainage.”

The Council considers there is an omission in that there is nothing set out in Chapter 8 to direct Local Authorities to capture/report data on public open space loss, gain or enhancements through the implementation of policy. This would contribute to measuring the effectiveness of the success of the Mayors long term target to make more than 50% of London green by 2020.

User:	Sheila Cave

I support this policy, including the recommended Urban Green Space Factor, and subsequent narrative that mentions the important role of trees. I support the inclusion of the role and weighting for woodland and trees in Table 8.2 ? Urban Greening Factors. I recommend including a reference to Residential Development and Trees (Woodland Trust, 2015, woodlandtrust.org.uk/residentialdevelopments).

User:	Royal Borough of Greenwich

We support the specific requirement for major development proposals to contribute to urban greening, and the introduction of an Urban Greening Factor as tool to identify requirements for new development (Policy G5).

User:	London Borough of Richmond Upon Thames

Supportive, however the functionality of Urban Greening Factor would need to be trialled and assessed to see if it suitable for Richmond upon Thames. The wording in paragraph 8.5.1 is stronger than the policy wording. The policy wording should be strengthened to reflect this e.g. “G5A Major development proposals should ensure GI is integral to site planning and building design as it is fundamental to the greening of London. This can be achieved by incorporating measures such as highquality landscaping (including trees), living roofs, living walls and naturebased sustainable drainage.”

The Mayor recommends a target score of 0.4 for predominantly residential developments and 0.3 for commercial developments. The greening of new development is to be welcomed and this Council has policy to incorporate new biodiversity features into new and/or redevelopments where possible. There is a concern that a generic model will not take account of local circumstances and could impact on the viability of commercial developments in particular?

User:	Expedition Engineering and Useful Studio
The UGF tool is fairly high level and may need refining. It is important that developers show early on how they will meet targets by specifying the area set aside for urban greening, soil depth, SUDS capability and connections to strategic SUDS and by defining how schemes contribute to other functional requirements.	

User:	JJ Whitson

A short note to add to my voice to speaking up for trees and woodland in the New London Plan. I believe woodland and trees can improve health, beauty and the general well-being of a community. Please, “no net loss of overall green cover!”

User:	London Borough of Harrow

The Council generally supports this policy, and encourages the Greening of London, in an attempt to achieve the Mayors target of 50% green cover across the City.

It is suggested that a stronger, more precise definition of High Quality Landscaping is required to assist in negotiating with planning applications.

It is further suggested that the term ‘Green Roof' is replaced with ‘Living Roof’ to provide Developers more options when addressing this issue.

User:	London Borough of Harrow

Table 8.2 is not user friendly as it is not clear as to how it works in terms of ‘net’ value added. It does not take in to consideration the ‘baseline value of the site’, rather just what is would add from a ‘zero’ point. The Council suggest that this policy utilise the DEFRA Metric.

User:	London Borough of Harrow

Para 8.5.3: it would be encouraged that the Mayor provides a London Wide Model, that can then be amended according to each Borough, but would ensure that trans-boundary issues are dealt with. the Plan should provide detail of how compensation would be sought and obtained.

User:	Royal Borough of Greenwich

Support introduction of the urban greening policy and use of Urban Greening Factor, however RBG considers there are some drawbacks with the approach that is currently set out in the Urban Greening Factor for London report.

User:	Royal Borough of Greenwich

In identifying the factor associated with permeable paving, consideration should be given to whether the permeable paving is infiltrating or linked to a rainwater harvesting system. Permeable paving can also be a very effective treatment stage for water quality, which is a positive impact or if any trees planted within the paving area are linked underneath.

User:	London Borough of Havering

Paragraph 8.5.2

The policy is supported in principle but the draft London Plan must recognise that the provision of additional street trees will place additional burdens on the maintenance budgets of boroughs which are already very stretched.

User:	Gwyneth Whittle
Policy G5 - Urban Greening – I support this policy, including the recommended Urban Green Space factor and subsequent narrative that mentions the important role of trees.	

User:	Gwyneth Whittle
Table 8.2 Urban greening factors. – I support the inclusion of the role and weighting for woodland and trees. **I recommend including** a rerence to Residential Development and Trees. (Woodland Trust 2015 – woodlandtrust.org.uk/residentialdevelopments)	

User:	Greenspace Information for Greater London CIC (GiGL)

GiGL response: there are many more ‘minor’ development proposals than ‘major’ in London that collectively cover a far greater area, and these have a role to play here too. As per Policy D1, anyone designing urban greening should understand the site in context with its surrounds to ensure it is locally appropriate. Additionally the term “green” should be defined to ensure it means living features rather than visually aesthetic solutions that are artificial to ensure they are of benefit.

User:	Rosemary Rakestrow

I support this policy, including the recommended Urban Green Space Factor, and subsequent narrative that mentions the important role of trees. I support the inclusion of the role and weighting for woodland and trees in Table 8.2 - Urban Greening Factors. I recommend including a reference to Residential Development and Trees (Woodland Trust, 2015, woodlandtrust.org.uk/residentialdevelopments).

User:	Kathryn Morton

I support this policy, including the recommended Urban Green Space Factor, and subsequent narrative that mentions the important role of trees. I support the inclusion of the role and weighting for woodland and trees in Table 8.2 - Urban Greening Factors. I recommend including a reference to Residential Development and Trees (Woodland Trust, 2015, woodlandtrust.org.uk/residentialdevelopments).

User: London Young Labour

Green infrastructure and Urban Greening

Members expressed extensive interest in innovative approaches to urban greening such as those outline in paragraph 8.5.2 and as such we strongly support these measures. In heavily and densely populated areas such as Tower Hamlets where space is scare we particularly welcome City Hall actively encouraging innovative solutions such as green walls and roof gardens.

User: Mr Joe Ward

The ‘Urban Greening Factor’ outlined in Policy G5 does not address the human use of green space and overlooks qualitative considerations and a wealth of knowledge about how people use green spaces and how design can enhance their experience.

Proposed change:

Policy G5 – a further sub-section should be added as follows: **(C) Urban greening required and delivered in new developments will be additional to requirements to provide adequate green and open space as set out in G4. New developments must allow for provision of new green and open space in addition to meeting urban greening requirements.**

Rationale: Urban greening provisions are supported in general. It should be made clear, however, that this should be in addition to green space provision and the amenity those spaces provide. Those designing new developments should be required to consider the amount and quality of green space needed to fulfil human needs, as well as the amount of green cover required as part of the Urban Greening Factor. Unless this is made explicit in the London Plan, there is a real danger that the Urban Greening Factor will be used by developers to reduce the amount and quality of green space available for public use.

User:	(FOE) Friends of the Earth England Wales and Northern Ireland

We support this policy, in particular criterion A that "Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage."

User: Nicki Lang

Urban greening. I support this policy, including the recommended Urban Green Space Factor, and subsequent narrative that mentions the important role of trees. I support the inclusion of the role and weighting for woodland and trees in Table 8.2 - Urban Greening Factors. I recommend including a reference to Residential Development and Trees (Woodland Trust, 2015, woodlandtrust.org.uk/residentialdevelopments).

User:	London Borough of Enfield

Policy G5 looks at Urban Greening. It is unclear how the mayor has arrived at the Urban Green Factor (UGF) target scores. This makes it difficult for local authorities to understand how to go about setting a more appropriate UGF. UGF should be used more widely.

User: London First

We support the aim of this policy: increasing the amount of green surfaces in London, including green walls, roofs and landscaping, and thereby contributing to the improvement of London's environment. The ability for any development or building to deliver urban greening will differ depending on the proposed use and operational requirements, such as plant and machinery – which may need to be located at roof level – and yard space at ground level for industrial or logistics use, or the requirement for roof-mounted renewables.

We are concerned that the viability appraisal has not properly tested the costs of delivering urban greening. For example, appendix H of the Viability Assessment Technical Report states that the costs of urban greening measures have been included in the external works costs, but, as these are based on benchmarks (existing developments), it is unlikely that the costings will reflect these new draft policy requirements. To explain this further, to achieve an Urban Greening Factor (UGF) of 0.3 in central London, changes to the building form are likely to be required, such as creating an extra floor for services equipment to enable the roof to be fully greened.

The policy's target UGF figures of 0.4 and 0.3 for residential and non-residential respectively are based on three case studies (In the evidence base report Urban Greening Factor for London Report 2017 - ref supplied) (two domestic and one commercial), which are not representative of the full range of development types and built form in London. Hotels, industrial, retail and mixed-use schemes have not been tested. The calculation methodology does not reflect areas of a building where green infrastructure is not achievable, for example, sloped or mansard, particularly involving heritage assets and conservation areas. The policy should be flexible enough to deal with such considerations.

In addition, the boundaries used to determine the example figures are not representative of the plot/site boundary and seem to be arbitrary depending on the building, with no surrounding public realm included. By its very nature, surrounding public realm tends to incorporate more hardstanding which will reduce the deliverable UGF figures. Existing central London projects with terraces, green roofs and extensive landscaping have been found to deliver UGF values of between 0.11 and 0.17, meaning that it would not be possible to meet the policy target of 0.3. If surrounding landscaping in suburban locations is taken into account, then the target becomes much more achievable.

The policy should be amended to include a more achievable UGF of 0.2, especially for Inner London sites. Furthermore, we do not agree that boroughs should have the ability to set different factors; instead, the target should be sensitively applied, having regard to the context and location of the site, and each application should be considered in terms of the need to balance other policy objectives.

Policy G5 (part B) currently reads:
Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development.

It should be amended to read:
Boroughs should ***sensitively apply the*** *Urban Greening Factor (UGF),* ***having regard to the size and context of the site, and overall nature and benefits of the proposal****, to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to* ***site*** *circumstances. The Mayor [Delete: recommends]* ***suggests*** *a target score of* ***0.2*** *for developments that are predominately residential, and a target score of 0.3 for predominately commercial development.* ***Where there are particular constraints such as conservation areas or listed buildings a target score of 0.1.***

User:	Fiona Macdonald

I support this policy, including the recommended Urban Green Space Factor, and subsequent narrative that mentions the important role of trees. I support the inclusion of the role and weighting for woodland and trees in Table 8.2 - Urban Greening Factors. I recommend including a reference to Residential Development and Trees (Woodland Trust, 2015, woodlandtrust.org.uk/residentialdevelopments).

User:	John Innes Society
We support Policy G5 – Urban Greening.	

User: Berkeley Group

9.5. Urban greening is important to the environmental, amenity and attractiveness of London. Berkeley Group developments incorporate substantial public realm, including landscaping and parks. We have committed that all our developments will increase biodiversity, incorporate measures to adapt to climate change, and include living roofs. We are currently delivering over 500 acres of parks, public realm and open space, and planting over 9,500 trees. We support the principle of urban greening but consider that flexibility is needed in application and further research and consultation is needed to ensure that the factors are achivable.

9.6. The ability to deliver urban greening will be determined by factors including the size and nature of the site and the need to accommodate other infrastructure such as plant and machinery which is often located on the roof as is renewable energy infrastructure. The factors will be particularly challenging on constrained sites where there is a small site footprint, including the small sites which the Mayor is encouraging through the presumption in favour and which make up 38% of the housing target. On the most constrained sites, achieving the factor might require additional floorpsace to accommodate plant which may not be physically possible or acceptable in planning.

9.7. The viability assessment of the draft Plan needs to consider the cost of urban greening as well as the potential opportunity cost of reduced floorspace.

9.8. We have tested the proposed factor of 0.4 for residential developments and this is very challenging; we would recommend that 0.2 would be more realistic especially for inner London sites. We do not think that boroughs should set separate factors, rather the application should have regard to site circumstances and context.

9.9. The calculation proposes that all the factors are calculated by area. For trees it would be more appropriate to use the size of the tree canopy rather than the number of trees. As green walls and hedges are linear features, clarification should be provided on how to calculate their area. Further guidance and worked examples would be helpful.

Policy G5 Urban greening

B Boroughs should develop an(strikethrough) sensitively apply the Urban Greening Factor (UGF), having regard to the size and context of the site, and overall nature and benefits of the proposal, to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local(strikethrough) site circumstances. In the interim(strikethrough), The Mayor recommends(strikethrough) suggests a target score of 0.42(strikethrough) for developments. that are predominately residential, and a target score of 0.3 for predominately commercial development.(strikethrough)

User:	Jill Henderson

Policy G5. Urban greening. I support this policy, including the recommended Urban Green Space Factor, and subsequent narrative that mentions the important role of trees.

User:	Jill Henderson

I support the inclusion of the role and weighting for woodland and trees in Table 8.2 - Urban Greening Factors. I recommend including a reference to Residential Development and Trees (Woodland Trust, 2015, woodlandtrust.org.uk/residentialdevelopments).

User:	Rebecca Rose

Making London greener is essential for people’s health and wellbeing. Yet many local green spaces face pressure from new development. The Plan must recognise that loss of green space cannot always be made up for through green roofs and sustainable drainage schemes, valuable though these features are (para 4.2.9). Policy should make clear that provision of and access to green space should always be considered when planning new development.

User: HTA Design LLP

Policy G5 encourages boroughs to introduce their own ‘urban greening factors’. This places a significant emphasis on the provision of urban green cover, including street trees, green roofs, green walls and rain gardens. The overall aspiration is supported, however there are aspects of this policy which we believe require further refinement. Though green walls and roofs can undoubtedly contribute to strategic issues such as water management and air quality improvement which are significant importance they offer fewer benefits in terms of creating improved access to green space for people living nearby. In particular, the weighting of different types of spaces such as amenity grassland and permeable paving, which are often used to provide valuable usable amenity space to residents within residential developments could be detrimentally affected by the low suggested weighting of these elements. The interrelationship between access to green space, the quality of these spaces, and other aspects needs to be given further consideration.

In addition, we would suggest the Mayor gives further consideration to how he envisages elements such as green roofs and green walls will be maintained in the long term, whether these will be secured through planning obligations or otherwise. This should be incorporated into the plan to give developers certainty of the expectations around this so allowance is made from an early stage for costing of urban green elements.

We would be interested to understand whether the potential cost of the ‘urban green factor’ (and its maintenance over time) has been tested in terms of typical scheme viability. It could have a significant impact.

User: Just Space

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

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

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

Green Space and Infrastructure

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

What Needs to be Done:

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

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

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

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

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

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

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

User: London Borough of Bexley

The Council supports the reference in **Part A** of **Policy G5 Urban greening** to *nature-based sustainable drainage*; this will be helpful in ensuring high-quality SuDS options are chosen for developments. However, this only relates to major development, and it is recommended that this be changed to refer to all developments. In addition, the principle of introducing an urban greening factor is welcomed as set out in **Part B** of **Policy G5** and **Table 8.2**; however, it is not clear if this is just for major development as per Part A; if it is, then it is suggested that this should be more broadly encompassing. The incremental green cover that can be achieved from any new development will bring cumulative benefit, and the increased emphasis on smaller sites in the draft Plan limit the effectiveness of the policy if it is only for major development. There is also no information in the policy or text on the impact this policy may have on development viability and it is recommended that this be addressed.

Greening should also contribute to local and national biodiversity objectives and air quality through appropriate choice of species, and should comply with legislation relating to avoidance of invasive non-native species. Within Bexley non-native species are regularly encountered on development sites. Consideration should be given to the impact of invasive non-native species (INNS), which is one of the largest threats to global biodiversity after habitat loss and destruction. It costs the British economy an estimated £1.7 billion annually. The London Invasive Species Initiative (LISI) has been created to help address these environmental and economic problems within the Greater London area and have compiled a list of species of concern in London. The importance of this issue appears to have been missed altogether in the draft Plan, and it is suggested that a reference be made in **Table 8.2** so that the planting of invasive species be avoided. An additional policy could also be added to **Chapter 8** that requires developers when implementing proposals to ensure that any invasive species found on site are eradicated effectively.

A description of brown roofs is made in the **Definitions** section of **Annex 3**, but there is no reference in **Table 8.2 Urban Greening Factors** or indeed anywhere else in the text of the draft Plan. It would be useful to add references to brown roofs in the text in **Chapter 8**, and also expand on the definition in Annex 3. Today, these are known as biodiverse roofs, which typically use commercially crushed brick and concrete with about 20% organic material. These are the most common green roofs in London, and have a greater water holding capacity to the previous brown roofs that consisted of recycled brick and concrete from local recycling plants which had limited water storage capacity and attracted ‘eco-dumping’ of inappropriate waste materials from contractors.

User:	The Woodland Trust

Support this policy, including the recommended Urban Green Space Factor, and subsequent narrative that mentions the important role of trees.

Recommend that the policy, or narrative, clarifies that the requirement to protect what is already there takes precedence. The good practice of the “Mitigation Hierarchy” aims to avoid loss or harm as the first step.

User: Buckinghamshire and Milton Keynes Natural Environment Partnership

Policy G5 – Urban Greening

We welcome the application of an urban greening factor to identify a target amount of urban greening required in new developments. However, to achieve maximum benefits, an emphasis on urban greening should also be a requirement of minor development too, below the current threshold of major development. The Buckinghamshire and Milton Keynes Natural Environment Partnership (The “NEP”) Response to the Draft London Plan

proposed factor does not appear to take into account baseline cover, so we would advocate that all target factors must be demanding to maximise benefits to all.

User: The Woodland Trust

Support the inclusion of the role and weighting for woodland and trees in *Table 8.2 - Urban Greening Factors*

Recommend a higher weighting for hedgerows in Table 8.2, as they will be located in publicly accessible locations where they will give more public benefit than some of the other elements listed.

Recommend including a reference to *Residential Development and Trees* (Woodland Trust, 2015, www.woodlandtrust.org.uk/publications/2015/07/residential-developments-and-trees/)

This document references the research that supports the importance of trees and green spaces in housing developments. Over 80 per cent of the population now live in towns and the benefits of providing high quality green spaces is widely recognised. These vital spaces can be taken for granted but add significant value to developments in terms of social, economic and environmental benefits. Integrating trees and green spaces into developments early on in the design process minimises costs and maximises the benefits they can provide.

User:	London Healthier Places
This policy is supported by the LHP Network.	

User: SEGRO

Policy G5 Urban Greening - *Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score 0.3 for predominately commercial development*

Our existing and generous landscaping strategy for new developments delivers a 0.15 UGF. However, the cost to SEGRO for increasing the UGF to 0.3 would be prohibitive from a construction and on-going maintenance perspective. Whilst a UGF of 0.3 may work on an office development, the Mayor needs to recognise the implications for industrial development. We have calculated that accommodating a green roof on a 100,000 sq. ft. industrial building would increase the development cost by 15%, making the development of the scheme unviable.

We therefore recommend that industrial development adopts a UGF of 0.15

User:	Pilbrow & Partners
All new residential units to be provided with an outdoor tap to facilitate watering of plants to encourage urban greening.	

User:	Ministry of Housing, Communities & Local Government

The Secretary of State’s Letter in response to the draft London Plan consultation refers to the detail and complexity of policy throughout the document and the need to retain a Strategic Focus in the London Plan. Policy G5 introduces an Urban Greening Factor. We would welcome assurance that the Mayor can demonstrate that this approach is not likely to limit development.

User:	Revo

The protection and enhancement of London’s green and open spaces is welcome, and it is acknowledged that a good level of provision and a variety of space is crucial to facilitating great places in which people want to live, work and play. The consideration of green infrastructure and how green spaces can add value to the development of an area is crucial. There must be a necessary shift in the densities deliverable and the best use of suitable development sites to meet need to ensure this protection and reach greening targets. We do not believe that the possible outcomes of draft urban greening policy have as yet been fully considered – these seem difficult to achieve for all sites (notably CAZ / inner London).

User: Redington Frognal Neighbourhood Forum

Policy G5 Urban greening

Urban greening measures outlined in Policy G5 do not address the human use of green space and overlook qualitative considerations, while Policy G6 needs to be strengthened to avoid loss of natural habitat and wildlife.

G5. A further point C should be added to the policy text box (page 308) as follows:

“C Urban greening required and delivered in new developments will be additional to requirements to provide adequate green and open space, as set out in G4. New developments must allow for provision of new green and open space, in addition to meeting urban greening requirements. “

User: SEGRO

Appendix – SEGRO Proposed Policy Amendments to the Draft London Plan

Policy G5 Urban greening

A Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

B Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for ***[DELETE: predominately commercial]*** **office-led** development, and **0.15 for industrial-led development**.

User:	Mr Jon Halse

Policy G5. Urban greening. I support this policy, including the recommended Urban Green Space Factor, and subsequent narrative that mentions the important role of trees.

User:	Mr Jon Halse

I support the inclusion of the role and weighting for woodland and trees in Table 8.2 - Urban Greening Factors. I recommend including a reference to Residential Development and Trees (Woodland Trust, 2015, woodlandtrust.org.uk/residentialdevelopments).

User: CPRE London

Urban Greening

The ‘Urban Greening Factor’ outlined in Policy G5 does not address the human use of green space and overlooks qualitative considerations and a wealth of knowledge about how people use green spaces and how design can enhance their experience.

Proposed change:

Policy G5 – a further sub-section should be added as follows: **(C) Urban greening required and delivered in new developments will be additional to requirements to provide adequate green and open space as set out in G4. New developments must allow for provision of new green and open space in addition to meeting urban greening requirements.**

Rationale: Urban greening provisions are supported in general. It should be made clear, however, that this should be in addition to green space provision and the amenity those spaces provide. Those designing new developments should be required to consider the amount and quality of green space needed to fulfil human needs, as well as the amount of green cover required as part of the Urban Greening Factor. Unless this is made explicit in the London Plan, there is a real danger that the Urban Greening Factor will be used by developers to reduce the amount and quality of green space available for public use.

User: Notting Hill Housing Trust

The NHH recognise the importance of ensuring development in London is carried out in as sustainable manner as possible and that are also attractive places where our residents are proud of living.

Significant green infrastructure features such as green roofs, green walls and rain gardens often require a high degree of maintenance. The cost of maintaining green infrastructure is either passed on to the affordable housing resident (shared ownership) or by the Registered Provider in the case of Affordable
Rents. The balance is therefore a delicate one for NHHT, who is driven to maintain affordability of the new homes we build, to maximise the provision of affordable housing and also directly manage the sites we build. Density plays a key role in the delivery of urban greening, where more homes delivered on a site
allows for a more equitable spread of lower charges.

We would ask that this policy and the Urban Greening Factor score is applied flexibly where it comes to schemes that offer a minimum 35% proportion of affordable homes and are of a relatively low density.

User:	Ruth Tattum

Policy G5. Urban greening. I support this policy, including the recommended Urban Green Space Factor, and subsequent narrative that mentions the important role of trees.

User:	Ruth Tattum

I support the inclusion of the role and weighting for woodland and trees in Table 8.2 - Urban Greening Factors. I recommend including a reference to Residential Development and Trees (Woodland Trust, 2015, woodlandtrust.org.uk/residentialdevelopments).

User: British Property Federation

We are encouraged by the many measures within the draft plan that seek to improve London's green and sustainable infrastructure. Requirements around urban greening for all major developments could play an important role in increasing the city's resilience against climate change and improve air quality, biodiversity and the general health and wellbeing of its inhabitants. We broadly welcome the intent of this policy, however feel that the possible outcomes of this draft policy have not been fully considered.

The evidence base for this policy (as outlined in The GLA's Urban Greening Factor for London 2017 Report) tests the Urban Greening Factor (UGF) formula on two residential and one non-residential case study. With the breadth of uses and building types within London including hotels, industrial, retail, and mixed-use properties, we do not believe that the UGF formula and target outputs have been robustly assessed. We also believe that the quantum of certain 'types' needed to satisfy the UGF target scores may be difficult to achieve, particularly on constrained/specialist sites and when considering other sustainability measures (e.g. PV on roof tops) that may have to be incorporated in a development.

We would therefore ask that the UGF (developed as a guideline for LPAs) is either retested and the draft policy revised, or that it is closely monitored to assess its success alongside the viability of the urban greening 'types' proposed. We would also welcome some clarity around the desired outcomes of this policy and whether the requirements are intended to maximise the quantum, or maximise the quality, of urban greening provisions.

User: Town and Country Planning Association

Policy G5 Urban greening

3.7.11 The TCPA supports this policy and welcomes both the emphasis on ensuring that all development proposals contribute to the greening of the capital, and the use of the Urban Greening Factor. The TCPA first championed the Urban Greening Factor in London as part of the Green and Blue Space Adaptation for Urban Areas (GRaBS) EU INTERREG-funded project with the London Borough of Sutton[i]. We are pleased to see the London Plan championing its application across the Boroughs and recommend that this approach is undertaken as part of he Policy G4 assessment and incorporated into local plans or any relevant SPDs.

[i] Annika Kruuse, GRaBS Expert Paper 6:The Green Space Factor and the Green Points System, TCPA, 2011

User:	Claire Mellish

The ‘Urban Greening Factor’ outlined in Policy G5 does not address the human use of green space and overlooks qualitative considerations and a wealth of knowledge about how people use green spaces and how design can enhance their experience. Proposed change: Policy G5 – a further sub-section should be added as follows: (C) Urban greening required and delivered in new developments will be additional to requirements to provide adequate green and open space as set out in G4. New developments must allow for provision of new green and open space in addition to meeting urban greening requirements.

User: Mr Terry Wilden

Comment

We generally support this policy**, but why does it only seem to apply to 'major development proposals'?**

The supporting text suggests it can be applied to all development proposals.

There are references to in the Plan to "no net loss of overall green cover", but green cover should be more clearly defined so that it includes the volume/surface area of green cover on a particular piece of land, taking account of, for example, the visual and biodiversity benefits of mature tree canopies.

Otherwise it will be acceptable for a small garden woodland to be uprooted and replaced by a building with a sedum green roof. It is not an equivalent replacement, nor one that enhances biodiversity as required by other London Plan policies.

Suggested Amendment

Policy G5 (A)

"*Development proposals* should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage."

Reason

To ensure that ALL new development proposals commit to giving urban greening a high priority in their design approach, in line with the Mayor's ambition for London to become the World's first National Park City.

User: London Environment Directors' Network (LEDNet)

Policy G5 Urban greening

We support the aim of the urban greenspace factor; in providing a pan-London standard for greening provision it should drive up levels and quality of greening. However, as currently worded it is too simplistic. We propose that the policy is reformulated to address a number of specific issues, but since they are complex and interrelated, we have not sought to suggest the best wording. The issues are:

- the danger that it creates a ceiling rather than a floor for provision by developers – the policy must not undermine boroughs' ability to secure more than baseline provision for a site;
- the lack of biodiversity value incorporated into the greening measures and the apparent assumption that no existing habitat would be present;
- the fact that some plants are better at filtering pollution than others – for example, woodland is more effective than grassland4;
- the efficacy of the options for achieving thresholds where a green roof is not an option;
- the lack of clarity on whether offsets elsewhere in a borough would comply with the statutory tests set out in paragraph 204 of the NPPF; and
- the failure to address invasive non-native species (see below).

We propose the following wording changes around invasive non-native species:

A Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. **Greening should contribute to local and national biodiversity objectives through appropriate choice of species, and should comply with legislation relating to avoidance of invasive non-native species.**

User: London Wildlife Trust

We support Policy G5 in principle, but it is not clear exactly as to where this applies. The Urban Greening Factor (UGF) only appears to apply to major development despite the strong emphasis for housing provision on small sites within the Plan. Whilst paragraph 4.3.9 of Chapter 4 makes provisions for no net loss of green cover for development on small sites, we recommend that this policy is amended so that development on small sites also contributes to a **net gain in green cover wherever possible**. It appears to assume that no existing habitat is present, as neither the policy nor the UGF take account of existing habitats.

Whilst we welcome the inclusion of the UGF it is successful application will be dependent on its interpretation. There is a danger that it creates a ceiling rather than a floor for provision by developers – it must not undermine boroughs' ability to secure more than baseline provision for a site.
There are some aspects which would benefit from greater explanation; for example extensive green roof scoring higher than flower-rich perennial planting, and the comparatively low score for hedges. It needs further clarity and explanation to avoid loss or damage to biodiversity.

Some of the references in Table 8.2 ((Urban Greening Factors) suggest that tighter guidance is called for (e.g. ground cover plants, references a list that includes species listed on Schedule 9 W&C Act 1981 – as the purpose of the list is domestic, whilst the UGF application would be much wider). We would expect explicit reference to appropriate habitats and species relevant to the area of London –- in which the application is being determined, for example as listed in Biodiversity Action Plans.

User: The Crown Estate

Urban Greening Factor – The Crown Estate is going beyond biodiversity plans for individual developments and are implementing an Ecological Masterplan for our central London estate as set out within our Development Sustainability Principles. Through this holistic masterplan, The Crown Estate is seeking to create over a hectare of new green space, an area one and a third times the size of Wembley Stadium football pitch. TCE is installing a range of range of different green initiatives, appropriate to the building and site context, such as, green roofs, biodiverse roofs, green walls, pocket habitats, community gardens, window boxes, planters, bird boxes, bat boxes and beehives – creating valuable habitats for wildlife and improving the experience for people living, working and visiting central London.
Our Ecological Masterplan activity has also kick-started Wild West End, a unique collaboration by The Crown Estate and other core West End property owners to promote green infrastructure in the capital, with the Mayor of London and London Wildlife Trust as strategic partners and technical input from Arup. This is the first city centre ecology project of its kind worldwide, conceived and driven forward by an industry partnership of this sort.
Even with our significant contribution to urban greening, we have tested some of our recent schemes against the Urban Greening Factor (‘UGF’) targets as set out within draft Policy G5. These schemes do not come even close to the target factor of 0.3 for predominately commercial development, as shown below:

Scheme	UGF achievement	Shortfall against UGF target (of 0.3)
St James’s Market Phase 1	0.07	-0.23
Plot Q2 (7 Air Street)	0.057	-0.243
21 Glasshouse Street	0.052	-0.248
Dukes Court	0.061	-0.239
Plot W5	0.035	-0.265

It is clear that these targets are incredibly challenging and will be very difficult to achieve, especially in central London where plots are spatially constrained and often within sensitive historic environments. Again, we consider that the introduction of this policy is at odds with other policies within the draft Plan. The strict application of draft Policy G5 would often mean that achieving other policy objectives may be compromised and would also have impact on scheme viability.

In addition, we do not consider that an approach to maximise the quantity of green space is necessarily the best approach to bring forward attractive, well-designed spaces that encourage local biodiversity. The focus within the London Plan should be on quality (and overall value) of green spaces, and maximising these where possible within the context of other policy requirements and strategic objectives.

We do not consider that this formulaic approach is suitable within the London Plan and suggest that draft Policy G5 be removed and replaced with a more high level policy on encouraging high quality local greening within new schemes.

Notwithstanding the above, if the policy was to be brought forward we suggest that a portfolio-wide approach would again be suitable.

User:	Living Streets
We support policy G5.	

User:	Frances High

I support this policy, including the recommended Urban Green Space Factor, and subsequent narrative that mentions the important role of trees. I support the inclusion of the role and weighting for woodland and trees in Table 8.2 - Urban Greening Factors. I recommend including a reference to Residential Development and Trees (Woodland Trust, 2015, woodlandtrust.org.uk/residentialdevelopments).

User:	Brixton Society
G5 Urban Greening: This approach to new development is welcome in principle.	

User:	Orbit

Orbit supports the principle or urban greening, however the recommended target score of 0.4 for predominantly residential developments may be too onerous and difficult for all schemes to achieve. This score may be particularly untenable when considered with the requirement for schemes to optimise housing density, which may reduce a sites capacity to incorporate a suitable number of urban greening measures to achieve a score of 0.4.

This policy should refer to a more tailored approach to calculating the appropriate urban greening score for a development is required, taking into account a range of site specific factors.

User: Mr Andrew Garrod

Policy G5.
Urban greening. I support this policy, including the recommended Urban Green Space Factor, and subsequent narrative that mentions the important role of trees. I support the inclusion of the role and weighting for woodland and trees in Table 8.2 - Urban Greening Factors. I recommend including a reference to Residential Development and Trees (Woodland Trust, 2015, woodlandtrust.org.uk/residentialdevelopments).

User: Silvertown Homes

Planning policy already addresses the relevant matters. Expecting applicants and decision-makers to apply a numerical assessment is onerous and inconsistent with England's discretionary planning-system in which different considerations must be weighed up in order to arrive at the optimum planning solution.

Such an assessment would be another burden on applicants and through requiring professional advice and the production of reports will present another deterrent to pursuing development.

This is especially relevant because the 'major development' threshold means it will affect many of the 'small sites' that the delivery of the London Plan relies upon.

Part B of Policy G5 which refers to an 'Urban Greening Factor' should be deleted.

User:	London Property Alliance
We address this in more detail within Section 7.	

User: London Property Alliance

The Alliance supports the principle of this policy, however the policy is non-strategic and detailed and we are concerned that it cannot be properly applied to CAZ sites.

No evidence has been supplied to demonstrate that the proposed urban greening factors can be successfully applied to central London development, whilst still delivering developments that accord with other policies.

The worked example at paragraph 8.5.4 of the draft Plan sets out how the Urban Greening Factor can be applied in a real life scenario. This example is unsatisfactory as it is not representative of schemes in central London locations, such as the CAZ. In the CAZ it would be expected that the footprint of a site would be maximised (potentially both in the existing and proposed scenario) rather than occupying 600sqm of the 1000sqm site area as stated in the example. If a scheme is to maximise the site's potential (which is required by other policies and, frequently, by good design principles), it would provide full site coverage.

In such locations, there is often no opportunity to add these urban greening factors into the design and the limited space is competing with other policies. For example, the opportunities for green walls would be restricted in the CAZ due to the proximity of neighbouring buildings and external walls. While green walls can look attractive in the short term, medium to long term maintenance often proves exceedingly difficult in comparison to lateral planting. Similarly, the possibility of incorporating green roofs is limited due to the lack of available space and the conflicting policy requirements including PV panels, amenity roof terraces and other design and conservation considerations.

Therefore, the Alliance consider policy G5 and the target scores cannot realistically be applied in central London locations, including the CAZ, given the high density nature of development and other policy considerations which need to be incorporated and compete for available space in the design. It may also be
inappropriate within Conservation Areas and for developments involving listed buildings.

In addition, policy G5 potentially adds significantly to cost of development. The deliverability of the policy does not appear to have been tested against residential and commercial schemes in the CAZ.

Whilst the Alliance supports urban greening in principle, it is important that policy is sufficiently flexible to adequately deal with development constraints presented in the CAZ. A prescriptive policy, setting a seemingly arbitrary target, is not considered appropriate for the CAZ. It is considered that design detail relating to the potential for urban greening on buildings should be left for local planning authorities to consider and determine.

We suggest that Policy G5 is removed, or amended to provide for a different approach within the CAZ.

User: Mr Paul McQuillen

The ‘Urban Greening Factor’ outlined in Policy G5 does not address the human use of green space and overlooks qualitative considerations and a wealth of knowledge about how people use green spaces and how design can enhance their experience. **Proposed change:** Policy G5 – a further sub-section should be added as follows: **(C) Urban greening required and delivered in new developments will be additional to requirements to provide adequate green and open space as set out in G4. New developments must allow for provision of new green and open space in addition to meeting urban greening requirements.**

User:	The Forestry Commission
We welcome: Policy G5 on urban greening and GI as a fundamental element of major development (8.4.1)	

User:	The Forestry Commission
We welcome: Policy G5 on urban greening and GI as a fundamental element of major development	

User:	The Forestry Commission
We welcome: Urban greening definition and role of trees (8.5.2)	

User:	Institution of Civil Engineers - London region

Urban Greening

The Mayor must provide strategic leadership for the capital on robust waste management systems, although this is the preserve of local authorities. The minimal greening factor of 0.3 is not an ambitious enough target. It is the view of ICE London that 0.7 would be a better target – both for commercial and private developments.

User: Barratt Developments plc

Planning policy already addresses the relevant matters. Expecting applicants and decision-makers to apply a numerical assessment is onerous and inconsistent with England’s discretionary planning-system in which different considerations must be weighed up in order to arrive at the optimum planning solution. Such an assessment would be another burden on applicants and through requiring professional advice and the production of reports will present another deterrent to pursuing development. This is especially relevant because the 'major development’ threshold means it will affect many of the ‘small sites’ that the delivery of the London Plan relies upon.

Part B of Policy G5 which refers to an ‘Urban Greening Factor’ should be deleted.

User:	The Forestry Commission

G5 Urban Greening - given housing proposals emphasise the contribution of smaller developments, need to ensure net gain is achieved there too; accessible green space must be preferred to inaccessible green space where possible, in recognition that exclusive GI may provide broad benefits but lacks local appreciation.

The basis for Green Space Factor proposed values seems unbalanced. We fully understand and support the importance of green roofs and walls especially in inner London but the score doesn't reflect the benefits delivery compared with semi natural vegetation or street tree planting in terms of multiple benefits, longevity of benefit delivery, cost/benefit and accessibility to nature.

User: Natalya Palit

Policy G5 places a significant emphasis on the provision of urban green cover, including street trees, green roofs, green walls and rain gardens. This aspiration is supported, however the Mayor should give serious consideration to how he envisages elements such as green roofs and green walls will be maintained in the long term. The Mayor should give consideration to how their ongoing maintenance will be secured through planning obligations or otherwise. This should be incorporated into the plan to give developers certainty of the expectations around this so allowance is made from an early stage for costing of urban green elements. The Mayor should also give consideration to whether this is an element that boroughs should monitor through AMRs or similar, whilst also taking into consideration limited Council resources. The Mayor could consider whether there are opportunities for data such as this to be captured and shared through new technologies, in line with the Mayor's wide 'open data' aspirations.

User:	London Borough of Sutton

SUPPORT. The London Borough of Sutton supports Policy G5 and has already implemented a borough specific Green Space Factor. It is important to recognise that through, for example, flower rich perennial planting, every effort is taken to maximise opportunities for local biodiversity (specifically insects) and not just soil connectivity / aesthetics. This needs to occur through consideration of flowering seasonality, pollen and nectar availability across seasons, pollen and nectar quality and rate of provision / regeneration, provision of suitable vegetation structure for hiding, resting, roosting, overwintering and breeding opportunities and provision of larval host plants and associated ongoing management.

User:	Patrick Mossop

Policy G5. Urban greening. I support this policy, including the recommended Urban Green Space Factor, and subsequent narrative that mentions the important role of trees.

User:	Patrick Mossop

I support the inclusion of the role and weighting for woodland and trees in Table 8.2 - Urban Greening Factors. I recommend including a reference to Residential Development and Trees (Woodland Trust, 2015, woodlandtrust.org.uk/residentialdevelopments).

User: Argent (Property Development) Services LLP

Draft policy G5: ‘Urban Greening’

Draft Policy G5 sets out a suggested approach for boroughs to develop an Urban Greening Factor (UGF). Whilst Table 8.2 indicates starting points of a UGF of 0.4 for residential developments and 0.3 for commercial developments, such a policy is overly rigid and does not take into account site specific circumstances. In our view, this level of scrutiny should take place at the Development Management level to make sure that they are maximising the use of landscaping, green roofs etc. Clearly, there also needs to be a careful balance to ensure that housing density is optimised consistent with the requirements of draft Policy D6. Part A of the policy provides an appropriate strategic basis for this. Part B of the policy is not however justified and should be deleted.

User: One Housing Group

Draft policy G5: ‘Urban greening’

Draft policy G5 sets out a suggested approach for boroughs to develop an Urban Greening Factor (UGF). Whilst Table 8.2 indicates starting points of a UGF of 0.4 for residential developments and 0.3 for commercial developments, such a policy is overly prescriptive and does not take into account site specific circumstances. It should be at the Development Management level that schemes are scrutinised to make sure that they are maximising the use of landscaping, green roofs etc. Part A of the draft policy provides an appropriate strategic basis for this. Part B of the draft policy is not however justified and should be deleted.

User:	Persimmon Homes

The policy is unsound because it is ineffective. We concur with the HBF that it is a local matter and should be devolved to the individual LPA’s development plans.

User: London Borough of Newham

Policy G5 Urban greening

LBN are generally supportive of the policy, including the introduction of the urban greening factor, which is complementary to Newham's Draft Revised Local Plan. However, the need to develop local approaches to UGF is questioned, particularly given the related resource impact. A pan-London only approach may be more appropriate, but should be kept under review to ensure it remains effective, given the danger of planning by numbers diluting the intent

Para A should also reference the requirement for long term maintenance commitments. Again, considering what boroughs are asked of, this policy could be better expressed in an integrated GI policy.

User:	CFGN Community Food Growers Network	
	Amends	Justification
Table 8.2	After ‘grassland’, add ‘vegetable, fruit and flower gardens and pasture, edible annual and perennial planting’.	The Urban Green factor needs to mention food growing as an example of semi-natural vegetation. These important types of green spaces could be overlooked if not explicitly referenced.

User:	Kesslers Stratford Limited

Draft policy G5 sets out a suggested approach for boroughs to develop an Urban Greening Factor (UGF). While we note that the guidance set out in Table 8.2 and the UGF of 0.4 for residential developments and 0.3 for commercial developments are set out as suggested starting points for boroughs, such a policy is over prescriptive, does not take into account site specific circumstances and it should be at the Development Management level that schemes are scrutinised to make sure that they are maximising the use of landscaping, green roofs etc. Part A of the policy provides an appropriate strategic basis for this. Part B of the policy is not however justified and should be deleted.

User:	Barnet Society

Policy G5 – Urban greening

We commend the Urban Greening Factor concept, and Table 8.2 will be a valuable tool.

User:	Clarion Housing Group

There are concerns about the ways that the new Urban Greening Factor has been devised and is to be used in built up areas**.** For example lawns, trees, and green walls are all considered to have the same impact. The application of the UGF and the recommended target score of 0.4. for residential schemes needs to reflect compromise arising from existing urban fabric and form e.g. it may be difficult to achieve for tower blocks in dense urban areas without more intensive green roofs. This may be in conflict with the desire to fit solar panels.

Clause G5-B *Add that the UFG will be adapted to distinguish between different green elements*

User:	Blackheath Society

Policy G5 Urban greening: We welcome the proposals for Urban Greening but their effectiveness will be limited if they are confined to major development proposals. As has been found in Lewisham, intense urban development can, in practice, consist of an aggregation of individual proposals/schemes and any urban greening obligations could easily be overlooked or ignored in these circumstances.

User:	Landscape Institute London

LI London wonders why only ‘major’ developments should contribute to the greening of London. This misses an opportunity to encourage green building techniques and extend open space. Urban greening should be applied to **all** development.

User:	Landscape Institute London

B – Whilst LI London recognises that each borough will be able to decide exactly how their own Urban Green Factor (UGF) is calculated and when applied, we wonder whether, using the London Plan guidelines, there will be a minimum acceptable UGF that boroughs will need to take on, or just a ‘suggested target’? The need for local variation is understood, but LI London is concerned that the UGF will be manipulated to minimise the provision of accessible green space. Why does the London Plan suggest a target of 0.4 for residential while the UGF for London report suggests 0.5?

User: Landscape Institute London

8.5.1 LI London agrees with the principles of this clause, but is sceptical as to whether the inclusion of Urban Greening measures in new developments will actually deliver an increase in open space, although we acknowledge it should produce a beneficial increase in overall Green Cover. A balance needs to be achieved between accessible green and open space and spaces for wildlife that should be protected from public access.

Although the scoring schemes for Urban Greening Factors are relatively simple, with an overall score ranging between 0 and 1, the factor assigned to any particular surface cover type may vary from one planning authority to another.' (8.5.3). It may be more appropriate to define a specific limit across all LPAs, in order to avoid high factors of low biodiversity or inaccessible green 'features' (as they are referred to on p.302, Policy G1, Clause A). LI London considers that the installation of Green Roofs should be a separate planning requirement from the UGF. As the UGF for London report demonstrates, they can be used to achieve targets. However, whilst green roofs are beneficial, particularly to biodiversity, air quality and the environmental sustainability of buildings, they rarely contribute to usable/ accessible green and open space for people. LI London considers this is an important difference.

Green Roofs are already a requirement in many other cities / countries for certain types of new buildings. The UGF for London report does not include these, as it focuses solely on cities that have used UGF, which is very different from the Green Roof cities, some of which are listed below:

• Hamburg's Green Roof Strategy is based on a combination of financial incentive, dialogue, regulation and science6;

• Toronto – compulsory since 2010 along with other 'aggressive' green infrastructure policies (small residential properties are exempt)7;

• In 2001, Tokyo mandated new buildings 1,000m2 or larger be covered by at least 20% of greenery8;

• Linz, in Austria is much smaller, but has compulsory Green Roofs as Linz had a serious industrial pollution problem9;

• Copenhagen was the first Scandinavian city to adopt a policy requiring green roofs for all new buildings with roof slopes of less than 30 degrees10;

• Basel, in Switzerland has the largest area of green roofs in the world per capita11;

• San Francisco was, in 2016, the first US city to require that certain new buildings be built with a green roof – 15-30% of roof space on most new construction projects to incorporate solar, green roofs or a blend of both12; and

• Denver - 20% of rooftop space on buildings over 25,000 square feet required from Jan 201813.

• Other cities have been incentivised to install green roofs, e.g. in Mexico City the city's environment secretariat is financing green roofs for their multiple environmental, educational and health benefits14. In France, however, a law making it compulsory for commercial buildings has been watered down.

6 http://climate-adapt.eea.europa.eu/metadata/case-studies/four-pillars-to-hamburg2019s-green-roof-strategy-financial-incentive-dialogue-regulation-and-science
7 https://www.toronto.ca/city-government/planning-development/official-plan-guidelines/green-roofs/
8 http://www.greenroofs.com/Greenroofs101/industry_support.htm#Japan
9 http://www.green-roof.group.shef.ac.uk/pdf/edmundmaurer.pdf
10 https://inhabitat.com/copenhagen-adopts-a-mandatory-green-roof-policy/
11 https://fenix.tecnico.ulisboa.pt/downloadFile/3779580646989/Basel%20Switzerland%20Building%20regulations%20for%20green%20roofs.pdf
12 From National Geographic. 27th Oct 2016
13 http://www.denvergreenroof.org/
14 The Guardian, 24th April 2014.

User: Landscape Institute London

8.5.3-4 and Table 2 Urban Greening Factor (UGF)
LIL is concerned that this will be used by developers to minimise the area of accessible / usable open space to maximise development of the site and make up the UGF by beefing up on the Green Walls and Green Roofs. Green Walls companies are already using this as a selling point. The UGF could be manipulated and become a tool to aid ‘greenwashing’.

Non-native species mixes and problems with long-term maintenance of green walls are also a concern. This is a relatively new technology and may prove unsustainable on all but the most high-end developments. An example is the failure of the green wall at Westfield Shepherds Bush. More research is needed on ecological value of green walls. There is extensive use of non-native perennials, grasses and ferns in green walls throughout London, which will presumably need replacing regularly and provide shelter but some species may produce little in the way of nectar rich habitat for insects.

This is recognised in the Urban Green F for London report, which suggests that it could become a tick-box exercise and also that the 2-D exercise may not be appropriate for the increasing numbers of very tall buildings in London.

LI London applauds the inclusion of soil volumes as a factor, with a higher factor for a more suitable quantity of soil, but questions whether the differential is sufficient to encourage better soil provision.

Should semi-natural ‘flower-rich grassland’ score the same top mark as woodland and ‘semi-natural vegetation’? How can flower rich grassland that can be established in 1-2 years be comparably scored with mature woodland that has taken 100 years plus to establish and will support a vastly greater range of species?'

It may be more appropriate to define this high quality grassland as ‘species-rich’ rather than ‘flower-rich’. This may include both (recreations of) native species grassland as well as colourful but non-native flower meadows.

User: London Beekeepers' Association

Comments on Policy G5

? We welcome the concept of an Urban Greening Factor, especially if it can encourage developers to include green infrastructure (and thus forage for bees) in their plans.

? We expect that developers will “manage down” to the minimum target scores set by the Mayor, seeking the lowest cost ways to do so. Therefore, it will be important to set targets that drive the right outcomes.

? Allowing each borough to develop its own approach to the UGF risks confusion and a devaluation of the system as boroughs compete for private development incomes.

? We welcome the emphasis on green roofs and walls, ?providing? these are designed with biodiversity (and bees) in mind. We are concerned that the introduction of green roofs and walls might be used to justify the loss of existing green spaces - or as reasons to avoid including green spaces in developments.

User: Highgate Society

G5A - Object

The wording in this policy should be strengthened to state that major development proposals “must” contribute to the greening, not just “should. The “high quality landscaping” mentioned should “require” tree planning, not just “include” it as an option. A developer’s responsibility should also extend to the areas adjacent to the large development ensuring that street trees are retained or replaced. . And, once again, the definition of “high quality” must not be left to pre-application discussions between Planners and Developers; the views and expertise of affected local communities and Design Forums must also be required as a part of the planning process.

G5B - Object

The target UGF (Urban Greening Factor) for development seems too low mentioning only grassy areas, green roof, permeable paving… There are options to include drainage, flora, etc. and these should be the targets, so the aim is to perform at an optimal level, not the bare minimum.

It is also unclear what is meant by “tailored to local circumstances”. Does it mean that if there is a lot of open space in an area, then the developer must provide a commensurate amount of urban greening, or is less necessary than in an area of open space deficiency?

Indeed, the differential for residential and commercial developments seems completely mistaken. Residential developments are required in any case to incorporate amenity open space and gardens, while commercial developments will endeavour to maximise economic aspects by minimising the amount of greening. In particular, the redevelopment of a fully-developed commercial estate should be used as the opportunity to introduce a higher Urban Greening Factor than existed previously.

User:	Hoare Lea LLP`

Boroughs to set local UGF targets. IN interim, GLA minimum expectations for UGF of 0.4 for residential and 0.3 for commercial developments.

0.4 is the equivalent of ‘Amenity grassland (species-poor, regularly mown lawn)’.

0.3 is the equivalent of ‘Extensive green roof of sedum mat or other lightweight systems that do not meet GRO Code 2014I’.

User: London Borough of Ealing

The Council supports this policy, although it would benefit from additional advice (perhaps in an SPG) outlining its application in practice. Should an appropriate place be found for such advice, we would also recommend that some of the supporting text be transferred over to this, as the level of detail here would sit better in an SPG than in the policy itself.

Further information, for example, is needed to explain how a vertical measure (e.g. green walls) should apply to a horizontal calculation (site area). In theory projects incorporating green walls could score more than 1 because the surface area of the building facades could be larger than the development footprint.

Although the policy encourages boroughs to assess the proposal against the target levels, it may also be useful where appropriate to score the baseline position, and then consider the proposed position against the existing situation to establish if it represents an improvement.

User: Natural England

Natural England strongly supports the measures included in this policy for major development to contribute to urban greening. Measures such as this are vital in ensuring that the target to increase green cover in London to over 50%, as outlined in the draft London Environment Strategy, are met. However, the policy should be significantly strengthened as, in its current form, the policy does not guarantee that development will contribute to an increase,, and indeed has the capacity to lead to a net loss of, green cover because the policy does not take account of baseline green cover, and therefore could conceivably result in a net loss of green cover even if the development in question were to attain a high green factor score. In limited circumstances, well designed and maintained, high quality greenspace can provide a more useable and biodiverse space which could offset a spatial loss. This should generally only be considered where the new greenspace would provide a net gain in biodiversity, accessibility and ecosystem service provision.

We are also concerned that the Urban Greening Factor only applies to major development despite the strong emphasis for housing provision on small sites within the Plan. Whilst paragraph 4.3.9 of Chapter 4 makes provisions for no net loss of green cover for development on small sites, we advise that this policy is amended so that development on small sites also contributes to a *net gain in green cover wherever possible.*

Furthermore, whilst the scoring system in this Policy ranks semi-natural habitats highly, the value of a given green cover type is highly dependent on local context factors such as existing levels of ecosystem service provision, deficiencies in access to greenspace, and the distribution of priority habitats and species. Therefore the policy should provide greater detail about the factors Boroughs should consider as they develop their own greening factor models. In particular, the policy should state that the factors outlined in Sections B.2, B.3 and B.4 of Policy G6, relating to greenspace deficiency, habitat creation in an urban context, and priority species and habitats, should be integrated during the formulation of a Borough-level greening factor model. It may also be useful to suggest sources of evidence to be used to ensure that green cover options which cater to local biodiversity and greenspace priorities will be favoured above those which would be less appropriate or surplus to requirements in a local context, and how these considerations may be factored into an Urban Greening Factor calculation.

We would also like to highlight that creation of high quality, publically accessible greenspace should be provided in preference to inaccessible greenspace, and that this is reflected in the scoring regime set out in Table 8.2. Existing features of biodiversity interest should also be retained where possible in line with the mitigation hierarchy outlined in Policy G6.

We recommend that:

- The policy is reviewed to ensure that development also provide a net gain in green cover on site. One possible solution would be to incorporate additional supporting text is under 8.5.4 to read: '*In addition to meeting the target score, development should also provide an overall net gain in the area green cover on site.'*

- Further guidance is provided in the supporting text under 8.5.4 to describe how local context factors will be taken into account through the provision of priority habitats within the calculation.

- That the policy is reviewed to ensure that adequate consideration is given to the issue of accessibility in relation to newly provided greenspace

User: CIBSE

We support the intent of urban greening and welcome the attempt to introduce a measurable objective to monitor progress; we cannot comment at this stage on the proposed approach using UGF, nor on the recommended target score of 0.4. It would be useful to understand the rationale behind this recommended target score, why a lower score is expected of commercial developments than of residential developments, and how the individual Borough UGF scores are expected to fit within the Mayor's overall manifesto commitment of ""London at least 50 percent green by 2050" (policy G1).

For this policy to be effective, it should be linked to monitoring requirements at a development and Borough level – see our response to Chapter 12 – Monitoring.

While we cannot comment on the details of the UGF proposals, we would recommend methods that particularly reward accessible and visible green space, to maximise their benefits for health and wellbeing.

As noted in our introduction to this chapter, vegetation can have benefits for air quality, and would therefore contribute to the delivery of policy SI1.

See also overall chapter comment on maintenance.

User: London Friends of Greenspaces Network

G5 The ‘Urban Greening Factor’ outlined in Policy G5 does not address the human use of green space and overlooks qualitative considerations and a wealth of knowledge about how people use green spaces and how design can enhance their experience.

Proposed change:

Policy G5 – a further sub-section should be added as follows: (C) Urban greening required and delivered in new developments will be additional to requirements to provide adequate green and open space as set out in G4. New developments must allow for provision of new green and open space in addition to meeting urban greening requirements.

Rationale: Urban greening provisions are supported in general. It should be made clear, however, that this should be in addition to green space provision and the amenity those spaces provide. Those designing new developments should be required to consider the amount and quality of green space needed to fulfil human needs, as well as the amount of green cover required as part of the Urban Greening Factor. Unless this is made explicit in the London Plan, there is a real danger that the Urban Greening Factor will be used by developers to reduce the amount and quality of green space available or being created for public use.

User:	Sustrans
We welcome the approach set out for major development proposals to contribute to the greening of London. Such measures are important means to provide shade and shelter, mitigating temperature extremes to enhance the experience of walking.	

User:	Sustrans
We welcome the clarifying policy that developments should seek to enhance and positively improve the nature conservation value of green corridors	

User:	Design Council

34. We support the introduction of an Urban Greening Factor as a means of measuring and assessing the amount of green space being provided by a development. This methodology should not detract from an assessment of the quality and usability of green space within schemes. Developments should be planned and laid out to maximise the potential of these spaces by ensuring they benefit from good environmental conditions and relate well to the development that they are designed to support.

User:	Mr Chris Rose

Table 8.2 goes some way to making it clear that not all 'urban greening' is equal. In particular, too many industrial units, supermarkets etc. get flung up and surrounded with an anachronistic 'corporate planting' comprising a jumble of 'easy care' non-natives of limited or very little wildlife value. I suggest you add such a category and give it a low score to indicate it is not recommended. (Semi-)natural vegetation - yes, including 'weeds' should be encouraged instead. The obsession with 'tidiness' in this regard needs to be overcome.

User:	Hornsey & Wood Green Labour Party

The ‘Urban Greening Factor’ outlined in Policy G5 does not address the human use of green space and overlooks qualitative considerations and a wealth of knowledge about how people use green spaces and how design can enhance their experience. Proposed change: Policy G5 – a further sub-section should be added as follows: (C) Urban greening required and delivered in new developments will be additional to requirements to provide adequate green and open space as set out in G4. New developments must allow for provision of new green and open space in addition to meeting urban greening requirements.

User: Landsec

G5: Urban Greening: We support the intention of the policy to increase the volume of urban greening in development. However, the proposed UGF of 0.3 could negatively impact the quality of design and amenity for certain developments. We have tested the policy against a number of our commercial schemes in the CAZ and we don't believe any of them could realistically achieve the target score of 0.3 Taking an example from our development pipeline, a 2,900m2 site currently undergoing application in Southwark would need to increase green roof or planted area provision from 370m2 to 1110m2 to meet the UGF threshold of 0.3. This would decrease both the roof space available for amenity access, and walkable public realm at ground level, which would have negative impact on the usability and hence occupant experience of the development proposed. We recommend the threshold is reduced to 0.15 for commercial-led and 0.20 for residential-led schemes, with the 0.3 or 0.4 factors retained respectively as target ratings. This would allow schemes to integrate green spaces in a sensitive way, whilst retaining useable and walkable areas. In addition, we propose the weighting allocated to provision of climbing green walls planted in soil could be increased to 1 to encourage better use of natural growing vertical planting in meeting the desired threshold. Where there are particular constraints such as conservation areas or listed buildings a target score of 0.1 should be applied.

User: Redrow Homes London Division.

Support is given to the objective behind the policy, however, expecting applicants and decision-makers to apply a numerical relative high numerical level of 0.3 UGF is onerous and inconsistent with England’s discretionary planning-system in which different considerations must be weighed up in order to arrive at the optimum planning solution.

Such an assessment would be another burden on applicantsand through requiring professional advice and the production of reports will present another deterrent to pursuing development. This is especially relevant because the 'major development’ threshold means it will affect many of the ‘small sites’ that the
delivery of the London Plan relies upon.

Part B of Policy G5 which refers to an ‘Urban Greening Factor’ should be deleted or, at the very least, the UGF level can be reduced under certain circumstances (for example, in conservations areas when using pitched / or mansard roofs)

User: London Parks and Gardens Trust

The Trust welcomes this policy but would add that we also need green infrastructure such as rain gardens, green walls and green roofs that are appropriate to their historic setting. This policy should also encourage better management and maintenance of parks and other green spaces so they can reach their full Green Infrastructure potential. With the right management parks can help cool the city but the evapotranspiration systems can't work if sites are parched, have inappropriate planting, are compacted or paved over with hardstanding to cope with the levels of over-use in areas of open space deficiency.

In that light we also urge greater care is taken to make sure that new space is given over to full public access rather than as private development which are often under-used and exacerbate the surrounding impact on existing public green space. Examples include the area along Nine Elms and near St George's Wharf where landscapes are kept locked mainly for viewing and are rarely used, and where planting does not offer as much environmental mitigation as possible.

With this in mind, the Trust queries the values placed in Table 8.2 and disagrees with the weighting for Amenity Grassland being of less value than Green Walls or Standard trees planted in pits with soil volumes less than two thirds the project canopy area of the mature tree, as we believe the social value and potential for use as informal play area has been overlooked in these calculations.

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User: Mr Steven Robinson

Re - Policy G5 Urban greening and Policy G6 Biodiversity and access to nature (Chapter 8 Green infrastructure and natural environment)

I am writing to comment on the draft London Plan. I strongly support urban greening and would like to see more more green roofs/walls and trees in London, particularly street trees to benefit wildlife and the people that live in the city. I would also like to see requirements for new builds over a particular size to have to include internal nest spaces for species like swifts, house sparrows and bats, as the two bird species for example have experienced significant declines, partly due to the loss of nest sites when buildings are refurbished. A lot of London councils already have their own sustainable development policies, but there needs to be more implementation in terms of requiring developments to install things like swift nest places or green roofs. In short, I feel that there needs to be a shift in culture where urban greening/biodiversity is no longer the exception, but becomes more widespread in planning and hopefully the London Plan can help to achieve this.

User: Cross River Partnership

The Plan's introduction of an Urban Greening Factor to be built into all applications over a certain size is certainly welcome. The Policy could perhaps usefully give further attention to retrofit greening of existing urban landscapes too, and the potential funding sources / incentives thereof. Explicit linkages with the Mayor's Health and Inequalities Strategy and associated policy measures e.g. green / social prescribing, could usefully beemphasised here. CRP and BIDs would be very happy to undertake any pilot initiatives on this on behalf of the Mayor.

An existing example includes the specific benefits that the Camden Highline will bring i.e. providing an environmentally friendly and healthy link between business zones in Camden and King's Cross, making use of old and abandoned infrastructure.

The Policy could also usefully be amended to reflect the role of the River Thames in London's green infrastructure. This is covered in Policy SI14 (Chapter 9 Sustainable Infrastructure) but could also productively be covered here too.

5115 9.11.3 – Developers should always consult the Thames Path Management Officer before proposing any extension, signage or alteration of the Thames Path.

9.14.7 – The Mayor should require a joint strategy for the Chelsea Bridge to Tower Bridge section.

Page 308. Open space categorisation. Add: Alongside existing and elevated railway lines to linear open spaces (e.g. of High Line project in Camden).

User: Lendlease

We recognise the important benefits associated with green infrastructure in our schemes and high quality public realm and the provision of high quality usable amenity space are key components for us in terms of creating the best places. However, the application of an urban greening ratio will not deliver by default, well designed landscaping or public realm which would have optimum benefits for the communities they serve nor will it ensure delivery of the highest environmental sustainability provision. The application of ‘Urban Greening’ will generate another technical ‘tick box’ to overcome.

The creation of great public spaces and well designed private amenity spaces is heavily dependent upon their design and local circumstances and there is a risk that by setting out further standards to be met would prevent otherwise appropriate and innovative solutions coming forward. It is essential that the planning system looks beyond the plans that are submitted and shows appreciation of how a development may be lived and is sensitive to the costs that additional policy burdens ultimately place on occupiers.

We are also concerned that failure to achieve the requirement will be used by the boroughs to refuse otherwise acceptable high density development.
The viability appraisal has not properly tested the costs of delivering urban greening. Appendix H of the Viability Assessment Technical Report states that the costs of urban greening measures have been included in the external works costs. However, these are based on existing developments and so it is unlikely that the costings will reflect these new draft policy requirements. To achieve an Urban Greening Factor (UGF) of 0.3 in central London, substantial changes to buildings are likely to be required, such as, creating an extra floor for services equipment to enable the roof to be fully greened. This amounts to a substantial expense which will clearly impact upon a development’s ability to meet other obligations within the plan. It is also unlikely to be achievable for developments involving listed buildings or within Conservation Areas.

The evidence base of the plan has not adequately demonstrated that the policy as currently worded is viable or considered the impact of increased service fees on the affordability of housing or workspace. The policy is therefore not consistent with national policy (NPPF, paragraph 173) and risks being ineffective, we consider it should be amended as follows:

Boroughs should develop ~~an Urban Greening Factor (UGF)~~ ***policies, tailored to local circumstances,*** *to identify the appropriate amount of urban greening required in new developments.~~ The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends suggests a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development,~~* ***subject to consideration of viability, design, heritage and other planning policy objectives.****”*

User:	Romford Civic Society

Policy G5. Urban greening. I support this policy, including the recommended Urban Green Space Factor, and subsequent narrative that mentions the important role of trees. I support the inclusion of the role and weighting for woodland and trees in Table 8.2 - Urban Greening Factors. I recommend including a reference to Residential Development and Trees (Woodland Trust, 2015, woodlandtrust.org.uk/residentialdevelopments).

User: dp9

Policy G5 – Urban greening

Whilst we support the ambition and principle of urban greening, we would question the practicality and implications of adopting something as prescriptive as the Urban Greening Factor. It will add yet another layer of complexity and doesn’t appear to take account of central urban sites where the likely development scenario is 100% site coverage.

RECOMMENDATION: Amend the policy to be less prescriptive in the ambition to encourage and increase urban greening.

User: Mrs P Matthews

I support this policy including the recommended urban green space factor, and subsequent narrative that mentions the important role of trees.

I support the inclusion of the role and weighting for woodlands and trees in table 8.2 urban greening factor.

I recommend including a reference to residential development and trees (woodland trust, 2015, woodland trust.org.uk / residential development)

User: Taylor Wimpey UK

Policy GS Urban greening

We support proposals to improve the quality of the environment and contribute to the greening of London as a fundamental and integral element of planning.

It should be recognised that sites may not a lways lend themselves to the measures set out in the Policy and alternative approaches to Urban Greening should be considered including off-site measures.

The policy may also impact on the viability of development, particularly in combination with other design led policy requirements set out in the plan and a balanced approach should be taken to reflect Para 173 of NPPF: "Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened".

Viability issues could in part be addressed through a more flexible approach and accepting alternative measures to achieving Urban Greening objectives.

User: Aberfeldy New Village LLP

Policy G5 (Urban Greening)

We recognise the important benefits associated with green infrastructure in our schemes and public realm and amenity space are key components for us in terms of place making. However, the application of an urban greening factor is a further technical hurdle that only adds to the requirements for already difficult and costly major regeneration projects.

The creation of successful public and private amenity spaces is heavily dependent on their individual design and local circumstances and there is a risk that by setting out further standards to be met, otherwise appropriate and innovative solutions would be prevented from coming forward. It is essential that the planning system in application determination can interpret the plans that are submitted and gain a clear appreciation of how a development may be used/ lived in. Development planning and management both have to be sensitive to the costs that additional policy burdens ultimately place on occupiers.

We are also concerned that failure to achieve the factor requirement will be used by boroughs to refuse otherwise acceptable high density development.

The viability appraisal has not properly tested the costs of delivering urban greening. Appendix H of the Viability Assessment Technical Report states that the costs of urban greening measures have been included in the external works costs. However, these are based on existing developments and therefore it is unlikely that the costings will reflect these new draft policy requirements. To achieve an Urban Greening Factor (UGF) of 0.3 in central London, this may mean creating an extra floor for services' equipment to enable the roof to be fully greened. This could well amount to a substantial expense which will clearly impact on a development's ability to meet other obligations within the plan. It is also unlikely to be achievable for developments involving listed buildings or within Conservation Areas.

The evidence base of the draft Plan has not adequately demonstrated that the policy as currently worded is viable or considered the impact of increased development costs on fulfilling other Plan policy requirements e.g. in relation to affordable housing, nor on deliverability. The policy is therefore not consistent with national policy (NPPF, paragraph 173) and risks being ineffective, we consider it should be amended as follows:

“Boroughs should develop an Urban Greening Factor (UGF) ***policies, tailored to local circumstances,*** *to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends suggests a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development,* ***subject to consideration of viability, design, heritage and other planning policy objectives, including deliverability.”***

User: Kingston First

The need to retain existing heritage assets limited the amount of green space available within the town centre, and so Kingston First welcomes draft Policy G5 and the concept of urban greening. This approach would encourage soft-landscaping to be provided on private land in areas where there is little opportunity to provide it on public land. Such an approach would signficantly raise the quality of the public realm and the bar for not contributing to this initiative should be set high.

The scoring system set out within Table 8.2 will go some way to promoting the greening of urban spaces, however the wording of draft Policy G5 should encourage developers to exceed the target score wherever possible

User: London Councils

The matter of including appropriate designations and policies for the protection of green and open spaces is not relevant solely to areas where deficiencies currently exist. Growth in numbers of residents, workers and visitors will place additional pressure on existing spaces in London. They will therefore need to be protected as a resource to address future needs. Open spaces in inner London areas are a finite resource and it is difficult to secure significant new areas of ground level open space.

The proposal that Development Plans and Opportunity Area Frameworks should ensure that future green and open spaces are planned for in areas with the potential for substantial change is supported. However, the Plan should be clear that green and open space contributions should be required for all developments subject to the need they generate.

There is a concern about the ability of the interim thresholds to be achieved where no green roofs will be provided. On many sites, it will not be practical to provide the types of green suggested due to site characteristics. Measures such as trees and hedges (due to the site area covered) are likely to have a limited impact on the overall urban greening factors applied to a scheme. Rather than introducing, a policy requirement at this stage – which seems to give a unjustifiably high rating for amenity grassland - we consider it would be better to defer the setting of factors to the boroughs, allowing area wide circumstances to be taken into account. It would also be helpful if the policy could provide assurance that offsets, such as tree planting, in a different part of a borough to the site of the proposed scheme, comply with the statutory tests set out in paragraph 204 of the National Planning Policy Framework.

Currently, boroughs can negotiate what is appropriate for a site taking into account the precise nature of the scheme, how it will be occupied and managed and circumstances of individual sites and buildings. It is vital that the urban greening factors cannot be used as a way for applicants to justify they do not need address the impact of their occupants on existing public open spaces.

User:	Peter Lawrence

I welcome the reference to urban greening in Policy D7 Public Realm. This should include a broader commitment to, and requirement for, conserving and restoring urban nature rather than the current common approach to installing trees in concrete or tubs and planting of low nature value.

User:	Jayshree Bakrania

I welcome the reference to urban greening in Policy D7 Public Realm. This should include a broader commitment to, and requirement for, conserving and restoring urban nature rather than the current common approach to installing trees in concrete or tubs and planting of low nature value.

User:	Rebecca Rose

I welcome the reference to urban greening in Policy D7 Public Realm. This should include a broader commitment to, and requirement for, conserving and restoring urban nature rather than the current common approach to installing trees in concrete or tubs and planting of low nature value.

User:	(FOE) Friends of the Earth England Wales and Northern Ireland

We welcome the reference to urban greening in Policy D7 Public Realm. However, this should include a broader commitment to, and requirement for conserving and restoring urban nature, including as an integral part of and alongside new development, rather than the current common approach to installing trees in concrete or tubs and planting of low nature value. We suggest the policy refer to the need to retain 'mature trees'.

User:	Marion Lerminiaux

I welcome the reference to urban greening in Policy D7 Public Realm. This should include a broader commitment to, and requirement for, conserving and restoring urban nature rather than the current common approach to installing trees in concrete or tubs and planting of low nature value.

User:	Adrian Jenkins

I welcome the reference to urban greening in Policy D7 Public Realm. This should include a broader commitment to, and requirement for, conserving and restoring urban nature rather than the current common approach to installing trees in concrete or tubs and planting of low nature value.

User:	Kam Sihota

I welcome the reference to urban greening in Policy D7 Public Realm. This should include a broader commitment to, and requirement for, conserving and restoring urban nature rather than the current common approach to installing trees in concrete or tubs and planting of low nature value.

User:	Lillian Billing

I welcome the reference to urban greening in Policy D7 Public Realm. This should include a broader commitment to, and requirement for, conserving and restoring urban nature rather than the current common approach to installing trees in concrete or tubs and planting of low nature value.

User:	Miriam Schmitter

I welcome the reference to urban greening in Policy D7 Public Realm. This should include a broader commitment to, and requirement for, conserving and restoring urban nature rather than the current common approach to installing trees in concrete or tubs and planting of low nature value.

User:	Helena Azzam

I welcome the reference to urban greening in Policy D7 Public Realm. This should include a broader commitment to, and requirement for, conserving and restoring urban nature rather than the current common approach to installing trees in concrete or tubs and planting of low nature value.

User:	Dolors Vila

I welcome the reference to urban greening in Policy D7 Public Realm. This should include a broader commitment to, and requirement for, conserving and restoring urban nature rather than the current common approach to installing trees in concrete or tubs and planting of low nature value

User:	Marisol Ferrin

I welcome the reference to urban greening in Policy D7 Public Realm. This should include a broader commitment to, and requirement for, conserving and restoring urban nature rather than the current common approach to installing trees in concrete or tubs and planting of low nature value.

User:	Alex Page

I welcome the reference to urban greening in Policy D7 Public Realm. This should include a broader commitment to, and requirement for, conserving and restoring urban nature rather than the current common approach to installing trees in concrete or tubs and planting of low nature value.

User: London First

At a general level we have concerns over the viability analysis. The only additional costs accounted for in this analysis were due to policy SI2. Appendix H of the Technical Report states that, for example, the costs of additional urban greening measures for policy G5 have been included in the external works costs. However, as the external works costs are based on benchmarks, it is unlikely that a strengthening of policies in this area will have been properly costed. This also applies to the additional measures required to improve air quality (SI1) where it is stated that costs have been tested but no evidence has been provided on these costs. We advise that additional analysis be conducted to properly establish the costs relating to the strengthened policies in the draft plan.

We do not feel that policy G5, urban greening, has been properly considered and therefore suggest it is either significantly revised or omitted. The target UGF figures quoted of 0.4 and 0.3 for residential and non-residential respectively are based on three case studies (two domestic and one commercial)) which are clearly not representative of the range of development types in London (urban_greening_factor_for_london_final_report.pdf). Hotels, industrial, retail and mixed use schemes have not been tested and therefore the target UGF figures have not been robustly assessed. In addition, the boundaries used to determine the example figures are not representative of the plot/site boundary and seem to be arbitrary depending on the building, with no surrounding public realm included. By its very nature, surrounding public realm tends to incorporate more hardstanding which will reduce the deliverable UGF figures. We are able to provide real life examples of deliverable UGF values if required. In addition, we have reservations regarding the type of greening that this policy will deliver. The draft London Plan already contains policies relating to biodiversity, trees, access to open space and flood risk mitigation, covered elsewhere in the plan, so what additional benefit will policy G5 confer on London? There is a risk that the ‘greening by numbers’ approach will create a focus on the quantity of urban greening without due consideration of the quality, setting or purpose.

User:	Battersea Project Land Company Limited

Policy G5 – Urban greening

Whilst we support the ambition and principle of urban greening, we would question the practicality and implications of adopting something as prescriptive as the Urban Greening Factor. It will add yet another layer of complexity and doesn't appear to take account of central urban sites where the likely development scenario is 100% site coverage.

RECOMMENDATION: Amend the policy to be less prescriptive in the ambition to encourage and increase urban greening.

User: London Borough of Camden

Criterion E (1) - This matter is not relevant solely to areas where deficiencies currently exist. Growth in numbers of residents, workers and visitors will place additional pressure on existing spaces in London. They will therefore need to be protected as a resource to address future needs. Open spaces in inner London areas such as Camden are a finite resource and it is difficult to secure significant new areas of ground level open space.

Criterion E (2) - “with the potential for substantial change” - while this is supported, the Plan should be clear that green and open space contributions should be required for all developments subject to the need they generate. This can be used to fund new open spaces or to enhance existing provision.

Criterion E (3) - Camden already seeks many of the elements set out in Table 8.2 where it is feasible to do so. It is unclear whether the approach in the Draft Plan will be effective in delivering significant levels of biodiversity gain. To be certain it will lead to more green infrastructure, the policy needs to make clear that these greening measures are additional to borough’s open space requirements. Greening measures should not be used as a substitute for development contributions which may otherwise be used to mitigate the impact of a scheme on existing open spaces.

Camden Council, through its planning policies, requires developers of all major applications to provide green roofs unless it can be demonstrated this would not be feasible or appropriate. The current London Plan states that “development proposals should wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity”. Camden has been able to establish what types of enhancement are appropriate in the borough through supplementary planning guidance, which itself has been informed by the Borough’s Biodiversity Action Plan. The package of enhancement measures will generally be proportionate to the scale of development/ size of site. Within this framework, planning officers are able to negotiate site appropriate measures. For example, on the recent Camden Goods Yard development (one of the largest schemes to be granted planning permission in recent years) the Council is securing a community managed wildflower meadow – this is equivalent to Factor 1 in Table 8.2 of the Draft Plan. There would appear to be a risk that the interim target scores set in Draft Plan Policy G5 will artificially reduce the number of enhancement measures councils will be able to achieve, as developers will benchmark against the interim standards. It would be difficult for the Council to argue there is an opportunity to deliver more on a site, if applicants can point to the Draft London Plan threshold having been met.

We also have a concern about the ability of the interim thresholds to be achieved where no green roof will be provided. On many sites, it will not be practical to provide the types of green suggested due to site characteristics. Measures such as trees and hedges (due to the site area covered) are likely to have a limited impact on the overall urban greening factors applied to a scheme. Rather than introducing, a policy requirement at this stage – which seems to give a unjustifiably high rating for amenity grassland - we consider it would be better to defer the setting of factors to the boroughs, allowing area wide circumstances to be taken into account. It would also be helpful if the policy could provide assurance that offsets, such as tree planting, in a different part of a borough to the site of the proposed scheme, comply with the statutory tests set out in paragraph 204 of the National Planning Policy Framework.

Currently boroughs can negotiate what is appropriate for a site taking into account the precise nature of the scheme, how it will be occupied and managed and circumstances of individual sites and buildings. It is vital that the urban greening factors cannot be used as a way for applicants to justify they do not need address the impact of their occupants on existing public open spaces.

User:	Abigail Woodman

Encouraging developers to think about green space is welcomed, but they must not be permitted to use the concept of ‘urban greening’ to justify designing public green open space out of new developments.

User: Mrs Alona Sheridan

The ‘Urban Greening Factor’ outlined in Policy G5 does not address the human use of green space and overlooks qualitative considerations and a wealth of knowledge about how people use green spaces and how design can enhance their experience.

Suggested change: Policy G5 – a further sub-section should be added as follows: **(C) Urban greening required and delivered in new developments will be additional to requirements to provide adequate green and open space as set out in G4. New developments must allow for provision of new green and open space in addition to meeting urban greening requirements.**

User:	Blanche Cameron

The ‘Urban Greening Factor’ outlined in Policy G5 does not address the human use of green space and overlooks qualitative considerations and a wealth of knowledge about how people use green spaces and how design can enhance their experience. **Proposed change:** Policy G5 – a further sub-section should be added as follows: **(C) Urban greening required and delivered in new developments will be additional to requirements to provide adequate green and open space as set out in G4. New developments must allow for provision of new green and open space in addition to meeting urban greening requirements.**

User:	Denis J Vickers - Consultant Ecologist

The strongest possible terms should be employed to see that all new developments are fitted with green roofs and/or green walls, bug, bird and bat boxes (retrofitting of existing buildings should also be explored) and that landscaping includes native and non-native plant species which are attractive to wildlife. These aims should be reflected in the advice given to local authorities in pursuance of their duties. Lighting in new (and existing) developments should be ‘bat friendly’ wherever appropriate.

User: Julia Palca

We support this policy, subject to the two important caveats identified below:

First, the policy should be amended to make clear that “urban greening” features, such as green walls and ground cover planting) should be provided in addition to the new areas of publicly?accessible green and open space which are supported by Policy G4.

Second, the definition of “urban greening” states that “green roofs” and “soft landscaping” are the most appropriate elements of green infrastructure. This is not
justified. It suggests that green roofs should be preferred over gardens, notwithstanding that the visual and biodiversity benefits of the latter (and the problems of
maintaining green roofs) are well known. Just as importantly, it is wholly inappropriate to hide away a hierarchy of “urban greening” types in the glossary to the plan. If the Mayor intends to include a policy preference in favour of green roofs over other forms of green infrastructure, he should say so in the policy itself.

For all of these reasons, Policy G5 is unsound.

User:	David Callow

Policy G5. Urban greening. I support this policy, including the recommended Urban Green Space Factor, and subsequent narrative that mentions the important role of trees. I support the inclusion of the role and weighting for woodland and trees in Table 8.2 - Urban Greening Factors. I recommend including a reference to Residential Development and Trees (Woodland Trust, 2015, woodlandtrust.org.uk/residentialdevelopments).

User:	David Tannahill

Policy G5. Urban greening. I support this policy, including the recommended Urban Green Space Factor, and subsequent narrative that mentions the important role of trees. I support the inclusion of the role and weighting for woodland and trees in Table 8.2 - Urban Greening Factors. I recommend including a reference to Residential Development and Trees (Woodland Trust, 2015, woodlandtrust.org.uk/residentialdevelopments).

User:	Elisabeth Rolls

Policy G5. Urban greening. I support this policy, including the recommended Urban Green Space Factor, and subsequent narrative that mentions the important role of trees. I support the inclusion of the role and weighting for woodland and trees in Table 8.2 - Urban Greening Factors. I recommend including a reference to Residential Development and Trees (Woodland Trust, 2015, woodlandtrust.org.uk/residentialdevelopments).

User: Adrian Malcolm Darley

Policy G5. Urban greening. I support this policy, including the recommended Urban Green Space Factor, and subsequent narrative that mentions the important role of trees. I support the inclusion of the role and weighting for woodland and trees in Table 8.2 - Urban Greening Factors. I recommend including a reference to Residential Development and Trees (Woodland Trust, 2015, woodlandtrust.org.uk/residentialdevelopments).

User: Agnes Byrne

Policy G5. Urban greening. I support this policy, including the recommended Urban Green Space Factor, and subsequent narrative that mentions the important role of trees. I support the inclusion of the role and weighting for woodland and trees in Table 8.2 - Urban Greening Factors. I recommend including a reference to Residential Development and Trees (Woodland Trust, 2015, woodlandtrust.org.uk/residentialdevelopments).

User: Alan Jacobs

Policy G5. Urban greening. I support this policy, including the recommended Urban Green Space Factor, and subsequent narrative that mentions the important role of trees. I support the inclusion of the role and weighting for woodland and trees in Table 8.2 - Urban Greening Factors. I recommend including a reference to Residential Development and Trees (Woodland Trust, 2015, woodlandtrust.org.uk/residentialdevelopments).

User: Alan James North

Policy G5. Urban greening. I support this policy, including the recommended Urban Green Space Factor, and subsequent narrative that mentions the important role of trees. I support the inclusion of the role and weighting for woodland and trees in Table 8.2 - Urban Greening Factors. I recommend including a reference to Residential Development and Trees (Woodland Trust, 2015, woodlandtrust.org.uk/residentialdevelopments).

User:	Mrs Desmonde Child

The Urban Greening policies are laughable. A few green roofs, window boxes and more street trees will not compensate for loss of open space, including gardens, nor for the loss of natural drainage caused by so much development. The flooding danger from predicted rises in sea levels from Global Warming has not been addressed.

User:	Knoll Residents’ Association

Policy G5 promotes maximising urban greening but this policy makes no mention of back gardens and ignores their contribution to health, amenity and habitats. Urban greening cannot compensate for the loss of gardens that have been built on. The presumption against development in back gardens has been lost ? this is contrary to national policy which excludes garden land from the definition of previously developed land.

User:	Hackbridge & Beddington Corner Neighbourhood Development Group

With the introduction of the Urban Greening Factor it offers a benchmark for neighbourhood groups to have discussions with developers and we welcome this.

User:	Fenella Barton

Urban greening. I support this policy, including the recommended Urban Green Space Factor, and subsequent narrative that “incorporates trees and/or other forms of greenery”.

User:	Joan Anne Hepworth

This support also applies to Policy G5 and also the inclusionm of woodland and trees in Table 8.2. Reference should also be made to "Residential Development and Trees/Woodland Trust, 2015.

User: London national Park City Foundation

Urban greening - Policy G5, Page 308

LNPCF PROPOSAL: Policy G5 and supporting text must relate and gear urban greening and landscaping to precise needs to restore nature, increase public contact with nature, and access to open space for play, recreation and learning, and build resilience. Such needs can be informed by metrics such as data on nature deficits and public health data and information from the All London Green Grid and GIGL.

1. Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.
2. Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development.

Supporting text:

5 8.5.1 The inclusion of urban greening measures in new development will result in an increase in green cover, and should be integral to planning the layout and design of new buildings and developments. This should be considered from the beginning of the design process.

8.5.2 Urban greening covers a wide range of options including, but not limited to, street trees, green roofs, green walls, and rain gardens. It can provide a range of benefits including amenity space, enhanced biodiversity, addressing the urban heat island effect, sustainable drainage and amenity – the latter being especially important in the most densely developed parts of the city where traditional green space is limited.

8.5.3 A number of cities have successfully adopted a ‘green space factor’ to encourage more and better urban greening. The Mayor has developed a generic Urban Greening Factor model to assist boroughs and developers in determining the appropriate provision of urban greening for new developments. This is based on a review of green space factors in other cities. The UGF is currently only applied to major applications, but may eventually be applied to applications below this threshold as boroughs develop their own models. London is a diverse city so it is appropriate that each borough develops its own approach in response to its local circumstances. However, the challenges of climate change, poor air quality and deficiencies in green space need to be tackled now, so while each borough develops its own bespoke approach the Mayor has recommended the standards set out above. Residential development places greater demands on green infrastructure, and as such, a higher standard is justified.

User: Keith Saunders

The importànce of trees and woodlands cannot be emphasised enough. They improve air quality, provide vital habitat for wildlife, much of which is disappearing from urban areas and aesthetically they help to brea? up views of endless buildings. Also, people feel better and more relaxed in wooded areas. I work as a conservation volunteer and any time spent in woodland makes me feel better in myself.

In the sections listed below (in the same order as they appear in the draft London Plan).

- Paragraph 1.3.3. Recommend an addition (in CAPS) to the following sentence: “Access to green and open spaces, including waterways AND TREES, can improve health, but access varies widely across the city.”
- Paragraph 3.9.5. I support the inclusion of “Protection for trees” as an issue in the amplification of potential negative impacts of large-scale basement development beneath existing buildings.
- Policy H1. Increasing housing supply. I recommend that Sentence B2)d is clarified so that “public sector owned sites” will not include woodland, parks and open spaces.
- Paragraph 4.2.9. I support the principle of “no net loss of overall green cover” as a result of small housing developments, and support “off-site provision such as new street trees” in order to achieve this principle. I recommend an addition (in CAPS) to the following sentence: "Loss of existing biodiversity OR GREEN SPACE, as a result of small housing developments, should be mitigated through measures such as the installation of green roofs, the provision of landscaping that facilitates sustainable urban drainage, or off-site provision such as new street trees in order to achieve the principle of no net loss of overall green cover. Rainwater attenuation features should be incorporated to achieve greenfield run off rates. LOSS OF ANY PUBLIC GREEN SPACE WILL BE COMPENSATED FOR WITH ALTERNATIVE ACCESSIBLE SITES.”
- Policy S4. Play and informal recreation. I support section B2)d, that residential development proposals for schemes that are likely to be used by children and young people should incorporate good-quality, accessible play provision for all ages, of at least 10 square metres per child that: “incorporates trees and/or other forms of greenery”.
- Policy G1. Green infrastructure. I support this policy, and subsequent narrative that mentions the important role of trees.
- Policy G5. Urban greening. I support this policy, including the recommended Urban Green Space Factor, and subsequent narrative that mentions the important role of trees. I support the inclusion of the role and weighting for woodland and trees in Table 8.2 - Urban Greening Factors. I recommend including a reference to Residential Development and Trees (Woodland Trust, 2015, woodlandtrust.org.uk/residentialdevelopments).
- Policy G6. Biodiversity and access to nature. I support this policy. I recommend that Sites of Metropolitan Importance and all ancient woodlands are added to the categories of planning applications that must be referred to the Mayor.
- Policy G7. Trees and woodlands. I support this policy. I recommend that Section B)1 is strengthened as follows (amendments in CAPS): “GIVE THE STRONGEST POSSIBLE protectION TO ‘veteran’ trees and ancient woodland, ESPECIALLY where these are not already part of a protected site”. I support the subsequent narrative on the role of trees, particularly paragraphs 8.71 – 8.73. I recommend referring London boroughs to guidance on ancient woodland and veteran trees: Planners’ manual for ancient woodland and veteran trees(Woodland Trust, 2017, woodlandtrust.org.uk/plannersmanual).

Please accept this my formal response to the consultation. I will look forward to hearing from you as the Plan progresss.

User: Angela Thomas

FREQUENT ROOF FLOODING/ climate change

I think financial support should be given to help people construct green roofs in order to slow down the torrential rain falls that keep occurring more and more often causing many of our houses to flood from the roof through the entire house. Millions of London houses are terrace Georgian/late Georgian with 'butterfly roofs' and with their small central gutters running from front to back of each property the water has no time to run away off the property and instead floods all three or 4 stories of the house. Grants should be offered to prevent this as it will happen more and more. Even simple solutions like sedum roofs additions are one of several solutions.

Policy G6 Biodiversity and access to nature

User:	London Councils

This policy contains a welcome reference to identifying deficiencies in access to nature and opportunities to address them, and to positively considering proposals with new habitat or which access to nature deficiency. However, in order to protect London’s existing biodiversity it is vital that boroughs assess direct, indirective and cumulative impacts on nature from development proposals.

User: London Borough of Tower Hamlets

We generally support the policy however consider it to have a number of strange omissions. We are particularly concerned that the policy doesn't seek net gains or even no net loss (as per NPPF) for biodiversity.

We are unsure what is meant by the term 'urban context' in part B3. If this term is to be used it requires clarification in the supporting text. We would consider a preferred term to be 'the local context' given the range of biodiversity contexts within London. We are concerned that this clause contains no reference to the London Biodiversity Action Plan or Local Biodiversity Action Plans, and suggest adding 'taking account of priorities identified in the London and local Biodiversity Action Plans'.

Part B1 states that boroughs should identify 'green corridors', but there is no further mention of these in Parts A and C or the supporting text, so it is not clear what status these have once they have been identified. Green corridors are given a degree of policy protection in the current London Plan. A further clause on encouraging connectivity should be reinstated.

Finally, part C should be clear that where the benefits of the development proposal do not outweigh the biodiversity impacts, the scheme can be refused. It should also reference cumulative harm to a SINC.

Paragraph 8.6.1 should include a requirement for a development to demonstrate it won't have an impact on the integrity of the site's conservation status, the third test required under the Habitats Directive.

User:	Royal Borough of Kingston
Support.	

User:	London Borough of Merton

Support with significant amendments Part A states that “the greatest protection should be given to the most significant sites.” It is not clear what is considered to be a significant site and this requires clarification. It is considered that the following phrase should be added at the end of the last sentence: ‘in accordance with the hierarchy in paragraph 8.6.1’ or by clarifying at the start of paragraph 8.6.1 that: ‘In descending order of significance, Sites of Importance for Nature Conservation (SINCs) comprise: …’

User:	London Borough of Merton

This policy is silent on the requirements of development proposals in relation to biodiversity, whereas the NPPF encourages ‘net gains in biodiversity’. Specifically, policies 7.19 C and D from the current London Plan have either been removed completely from the policy or moved from the policy into the supporting text.

User:	London Borough of Merton

The wording provided in part C “where harm to a SINC is unavoidable” provides a negative policy approach, which somewhat promotes the allowance of damage to a SINC and challenges the “protection” stated in policy G6(A). NPPF para 117 highlights that “planning policies should promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations…” It is suggested that the wording of Part C be redrafted to focus more on protection and enhancement than harm.

User:	London Borough of Merton
Part D should include the word “protection” alongside enhancement, to accurately reflect NPPF para109.	

User:	London Borough of Hackney
Hackney supports this policy	

User:	Ms R Farooq

Policies and funding are needed to improve the quality of green space by reducing noise, light and air pollution, increasing biodiversity, and by giving stronger protection to mature trees and hedgerows.

User:	London Borough of Hounslow

LBH broadly supports this policy. The Local Plan identifies green and blue corridors and sets out policies for protecting and increasing access to them.

We suggest that Para B1) should be altered as follows:

Policy G6 Biodiversity and access to nature
B 1) use the relevant procedures to identify SINCs and ~~green~~ ecological corridors…

User:	Lesley Halliday

I support this policy. I recommend that Sites of Metropolitan Importance and
all ancient woodlands are added to the categories of planning applications that must be referred to the Mayor.

User:	London Borough of Southwark

The council considers policy G6D could be more ambitious by requiring all development to consider opportunities to achieve a net gain in biodiversity. The New Southwark Plan seeks contributions towards a net gain in biodiversity by requiring development to provide features such as green and brown roofs, green walls, soft landscaping, nest boxes and habitat restoration and expansion, improved green links and buffering of existing habitats.

User: London Borough of Wandsworth

The Council is concerned that Policy G6 is weaker than current Local Plan Policy and wording. Suggest the inclusion of reference to the mitigation hierarchy as per NPPF para 118 e.g. “Sites of Importance for Nature Conservation (SINCS) should be protected. If significant harm cannot be avoided, adequately mitigated, or, as a last resort, compensated for then planning permission should be refused. The greatest protection should be given to the most significant sites.”

It is considered that the wording would benefit from including text on management and maintenance in perpetuity.

Regarding paragraph 8.6.3, corridors should include Green, blue and dark and also refer to creating/enhancing/protecting corridors between sites to help movement of species and genetic diversity of populations. Dark corridors are really important for bats and these should be identified and protected. Explicit reference should be made to “cumulative impacts” on SINCs alongside indirect affects. The biggest risk to SINCs in Wandsworth is the
cumulative impact of successive small effects which individually are not of sufficient magnitude but over time are deleterious.

User:	Sheila Cave

Biodiversity and access to nature. I support this policy. I recommend that Sites of Metropolitan Importance and
all ancient woodlands are added to the categories of planning applications that must be referred to the Mayor.

User:	London Borough of Richmond Upon Thames

The Council is concerned that Policy G6 is weaker than current Local Plan Policy LP15 and wording. It is also considered that the wording would benefit from including text on management and maintenance in perpetuity.

Regarding paragraph 8.6.3, corridors include Green, blue and dark and should also refer to creating/enhancing/protecting corridors between sites to help movement of species and genetic diversity of populations. Dark corridors are important for bats and these should be identified and protected. Explicit reference should be made to “cumulative impacts” on sites of biodiversity and nature conservation importance. Biodiversity, including the wider ecological and green infrastructure networks, play a crucial role in adapting to the effects of climate change.

User:	Expedition Engineering and Useful Studio

On major sites, especially brownfield sites or sites with rail and other sidings there will be pockets of biodiversity that are likely to be impacted. In areas of large-scale development such as in Opportunity Areas, Local Planning Authorities should review the biodiversity across their area as part of early surveys and establish a strategy (possibly as part of a masterplanning and capacity assessment process) for enhancing the biodiversity and preserving where possible existing habitat as part of a multi- functional approach to green infrastructure and urban greening. Net positive is a good ambition. How one measures net positive however should be clearly defined.

User: London Borough of Harrow

G6(A)

The first and second lines appear to be contradictory with respect to the level of protection.

G6: (B)

The ordering of the matters addressed under 1 — 5, should be re-ordered in order of importance.

The Council suggest that the Mayor provides clarity around a procedure for identifying matters such as Green Corridors, and a list of sites should be provided by the Mayor for consideration for 5551 Status.

G6(C)

(C)(3) Policy should follow mitigation hierarchy so development should not go anywhere near such sites as a first principle, which would then avoid damage to any biodiversity and / or SINC.

The Council considers that the draft Plan should greater clarity as to where impacts cannot be avoided, the how this would be compensated.

G6: (E)

Proposals which create new or improved habitats that result in positive net gains for biodiversity should be considered positively, as should measures to reduce deficiencies in access to wildlife sites where appropriate for the site.

User:	London Borough of Harrow
Statement under (A) (1) should also be included under G6.	

User:	Royal Borough of Greenwich

RBG recommends that Policy G6 include a specific requirement for major developments to provide a net gain to the biodiversity of the site as a means of increasing biodiversity across the whole of London. This is in addition to the urban greening policy G5 for major developments and would encourage developers to choose urban greening elements with a higher biodiversity value.

User:	Gwyneth Whittle
Policy G6 – Biodiversity and access to nature – I support this policy. **I recommend that** sites of metropolitan importance and all ancient woodlands are added to the categories planning applications that must be referred to the mayor.	

User: Greenspace Information for Greater London CIC (GiGL)

GiGL response:

Point B should have two additional clauses that cover:

o Validation and registration by London Boroughs of specific application types being dependent on the applicant demonstrating their application has been informed by a high quality evidence base on the natural environment

o A requirement on London Boroughs to have access to the same evidence base to inform their decisions on whether they grant permission.

Background to the above suggestion:

In 2011 we conducted a survey of London Boroughs to gain an understanding of how they were assessing applications' likely impact on the natural environment, and to garner support for a planning screening tool that we were developing in collaboration with Natural England.

27 of the 33 London Boroughs were partners in GiGL and already had access to our development control-related datasets and services, but our view was that the project provided an opportunity to help our partners make even better use of the data. It aimed to speed up their validation and decision-making processes by enabling them to batch screen applications against a set of rules based on national and regional policy and best practice.

However, based on the feedback via the survey, and additional dialogue with our planning officer, it became clear that few if any planning authorities were routinely screening applications, and in seeking planners to help with trialling the tool we realised that uptake would be low. Effectively, the tool was introducing the step of screening of applications for their likely impact on the natural environment in many cases, which in the absence of any accountability / monitoring at a national or regional level was less of a priority than the speed at which applications were processed. One planner went as far as telling us they didn't have any biodiversity in their borough to consider, which we obviously have a wealth of data to counter.

With the number of local authorities in our partnership hovering between 24 and 27, we continued to monitor our data search service against planning application statistics on a per borough basis, to try to encourage the remaining 6 to 9 London Boroughs to become partners and improve uptake of our data search service which is specifically aimed at informing planning applications. By 2016, we were still only providing reports for approximately 1% of applications. We knew this meant that applications that were likely to result in net loss of biodiversity were being submitted without being informed by sufficient up-to-date information, and those same applications weren't being properly assessed by the London Boroughs during the validation and decision-making stages either.

The Greater London Authority's Urban Greening Team commissioned research (Planning for Biodiversity 2016) that assessed planning applications against biodiversity criteria based on the planning application form 1APP, with additional criteria that brought in London Plan policies. The research established that approximately 18% of planning applications met at least one of the criteria, and arguably should all have been informed by our data search reports. To put it in perspective, approximately 15,000 applications weren't informed by high-quality up to date information, and despite promotion and the setting of best practice at a national level, including the BSI Standards Publication 'Biodiversity – Code of practice for planning and development' (2013), the figures haven't changed much since.

The National Planning Policy Framework (NPPF) Chapter on Using a Proportionate Evidence Base, Paragraph 165 states: Planning policies and decisions should be based on up-to?date information about the natural environment and other characteristics of the area including drawing, for example, from River Basin Management Plans. Working with Local Nature Partnerships where appropriate, this should include an assessment of existing and potential components of ecological networks. A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.

In addition, Section 40 of the Natural Environment and Rural Communities Act (NERC, 2006) also states that 'Every public body must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'

The current London Plan makes no reference to NPPF paragraph 165, and recent discussions with clients and partners have suggested that the absence of this requirement is the reason that so many applications and related decisions aren't routinely informed by the evidence base that we provide access to for this purpose, and that the current uptake is driven solely by stakeholders that are following their industries' best practice. We have no recent information on whether our Borough partners routinely use the planning-related datasets that we provide them, but we do know that 8 London Boroughs don't have access to our evidence-base, and the percentage of applications informed by a GiGL data search report in their areas range from approximately 0.6 to 1.1 percent.

We strongly recommend that paragraph 165 of NPPF is tailored to the London region in Point B, including a requirement that particular application types are informed by a high quality evidence base on the natural environment. There were recommendations on this set out in the Planning for Biodiversity report covering major, minor and householder application types that aren't included in the public-facing version of the report online. The report's recommendations would result in local planning applications, decisions and net gain initiatives being informed by robust evidence, and would deliver some of the recommendations in the London Assembly's 'At Home With Nature' report from 2017.

Point D should include a requirement for seeking net gain in biodiversity as per NPPF and the government's recently published 25 year plan

London Invasive Species Initiative's website states: Invasive non-native species (INNS) are one of the largest threats to global biodiversity after habitat loss and destruction. They cost the British economy an estimated £1.7 billion annually and Europe in excess of €12 billion annually. Co-ordinated action is essential in Greater London, and is relevant to A, B, C and D above.

User:	Greenspace Information for Greater London CIC (GiGL)

Point D should include a requirement for seeking net gain in biodiversity as per NPPF and the government's recently published 25 year plan

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User:	Rosemary Rakestrow

I support this policy. I recommend that Sites of Metropolitan Importance and
all ancient woodlands are added to the categories of planning applications that must be referred to the Mayor.

User:	Greenspace Information for Greater London CIC (GiGL)
E – proposals should be based on our habitat suitability mapping, which was created in collaboration with London's habitat action plan working group members. http://www.gigl.org.uk/habitat-data/bap-habitat-suitability-data/	

User: Greenspace Information for Greater London CIC (GiGL)

GiGL response: we welcome this with some suggested amendments

- The details set out in 8.6.3 also need to be considered at the pre-application stage, and this should be reflected in the policy as well as the supporting text
- Not all priority habitats and species are protected by the SINC network. The specifics of 8.6.3 regarding habitats and species should also be reflected in policy G6. In support of this, the statistics we provided to the project steering group of the Planning for Biodiversity research in 2016 were:

Water Habitats (hectares)
Within SINCs 4224
Outside SINCs104

Protected Species records (count)*
Within SINCs 255935
Outside SINCs173817

London Species of Conservation Concern records (count)*
Within SINCs 215405
Outside SINCs143749

Priority Habitats (hectares)
Within SINCs 11315
Outside SINCs1695

* These figures have increased since as our species data holdings are cumulative

- Additional illustration of London’s natural environment or visualisations of the resource are required. We can provide these to illustrate the extent of London’s green space, priority species and habitat hotspots, SINCs and associated areas of deficiency, habitat suitability maps etc.
- Many London Boroughs are reviewing and reissuing their biodiversity action plans as a means of measuring their activities in this area, and there is an appetite to do likewise for the regional biodiversity action plans in the biodiversity sector. It would be useful to reference this here.

User:	Kathryn Morton

I support this policy. I recommend that Sites of Metropolitan Importance and
all ancient woodlands are added to the categories of planning applications that must be referred to the Mayor.

User:	Kathryn Morton

. I support this policy. I recommend that Section B)1 is strengthened as follows (amendments in CAPS): “GIVE THE STRONGEST POSSIBLE protectION TO ‘veteran’ trees and ancient woodland, ESPECIALLY where these are not already part of a protected site”. I support the subsequent narrative on the role of trees, particularly paragraphs 8.71 – 8.73. I recommend referring London boroughs to guidance on ancient woodland and veteran trees: Planners’ manual for ancient woodland and veteran trees(Woodland Trust, 2017, woodlandtrust.org.uk/plannersmanual).

User: Mr Joe Ward

The approach to biodiversity and access to nature outlined in Policy G6 needs to be strengthened to avoid the loss of valuable habitats and wildlife.

Proposed change:

Policy G6 – The second sentence in sub-section A of this policy should be deleted, along with the whole of sub-section C. The following sentence should be added at the start of sub-section D **'All new development should seek to enhance biodiversity.**' **.**

Rationale: All Sites of Importance for Nature Conservation (SINCs) are precious and deserve to receive the highest level of protection. There should be no provision in policy which would allow development to harm a SINC regardless of their supposed relative significance. It is unlikely to be possible to compensate for the loss of biodiversity through alternative 'off-site' provision as the value of a site is often intimately connected with its location.

User:	(FOE) Friends of the Earth England Wales and Northern Ireland

it is important to protect and enhance SINCs and green corridors. We suggest this policy be strengthened to include a requirement for major development schemes to incorporate measures to protect and enhance biodiversity. We believe everyone should have an opportunity to experience nature close to where they live. We suggest therefore that further consideration be given to ways in which the policy could facilitate improved access to nature for Londoners.

User:	Nicki Lang

Biodiversity and access to nature. I support this policy. I recommend that Sites of Metropolitan Importance and all ancient woodlands are added to the categories of planning applications that must be referred to the Mayor.

User:	London Borough of Enfield

Policy G6 ‘Biodiversity and access to nature’ needs to provide further guidance regarding triggers for when an ecological survey is required as part of planning applications. It does little to set of designations off wildlife/green corridors, with proposals to protect them. Further to this, it does not reference the Environment Strategy which states that a biodiversity offsetting metric will be explored. The policy doesn’t do much more than protecting SINCs alone.

User:	Fiona Macdonald

I support this policy. I recommend that Sites of Metropolitan Importance and
all ancient woodlands are added to the categories of planning applications that must be referred to the Mayor.

User:	John Innes Society

We object to the last sentence of Policy G6. A. It gives the assumption some SINCs should not have as much protection as others.

User: Enfield RoadWatch

Biodiversity

The approach to biodiversity and access to nature outlined in **Policy G6** needs to be strengthened to avoid the loss of valuable habitats and wildlife. All Sites of Importance for Nature Conservation (SINCs) should receive the highest level of protection because it is not practically possible to offset their loss elsewhere.

We suggest the following change to policy **G6**.

Delete the second sentence in sub-section A and the whole of sub-section C. Insert the following sentence at the beginning of sub-section D '**All new development should seek to enhance biodiversity.'**

User:	Berkeley Group

9.10. We support improved biodiversity and access to nature (G6). Berkeley Group has developed a biodiversity toolkit that ensures that from the outset we are considering biodiversity in the design of our developments. Our developments include parks, lakes, swales, nesting boxes and bee hives.

User:	Jill Henderson

Policy G6. Biodiversity and access to nature. I support this policy. I recommend that Sites of Metropolitan Importance and all ancient woodlands are added to the categories of planning applications that must be referred to the Mayor.

User: Just Space

G6 Biodiversity and Access to Nature

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

What Needs to be Done:

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

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

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

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

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

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

User:	London Borough of Bexley

What is really damaging from this approach will be the loss of the mature trees in gardens, as these are hard to replicate on a green wall or roof, even though these are presumably protected by **Policy G7 Trees and woodlands**. In the main, the policies look to afford protections to *designated* green assets, such as Metropolitan Open Land, to public green spaces, as outlined in **Policy G4 Local green and open space**, and to Sites of Importance for Nature Conservation in **Policy G6 Biodiversity and access to nature**, but not to the modest suburban London garden.

User:	London Borough of Bexley

In order to protect London’s existing biodiversity it is vital that boroughs assess direct, indirective and cumulative impacts on nature from development proposals. Reference to this should be within **Policy G6 Biodiversity and access to nature**. In **Part B(2)** a reference to sites of borough and local importance for nature conservation has not been included. Seven Local SINCs are located within Bexley, which provide access to locally significant sites. Consideration should be given to the inclusion of these locally significant sites within the wording.

User: The Woodland Trust

Support this policy.

Recommend that Sites of Metropolitan Importance and all ancient woodlands are added to the categories of planning applications that must be referred to the Mayor.

Recommend that an intention to achieve Net Gain for Biodiversity is included in Policy G6. Both these additions would reinforce the Mayor's intention to protect and increase green cover (and realise the benefits that cover provides), and echo the government's commitment to net environmental gain.

User: Buckinghamshire and Milton Keynes Natural Environment Partnership

Policy G6 – Biodiversity and access to nature

• **The policy should state a clear requirement for a measurable net gain in biodiversity as a result of development.** Currently Policy G6 D and E encourage, rather than require, net biodiversity gain and do not comply with NPPF and NERC Act 2006 requirements:

There is a clear steer in the NPPF, NPPF planning guidance, and the Natural Environment White Paper towards development achieving a net gain in biodiversity:

• NPPF – Paras 7,8,9,17 (7th bullet), 109, 113, 114, 117, 118, 119, 152, 157 (last bullet), 187.

• NPPF planning guidance states the following:

http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/biodiversity-ecosystems-and-green-infrastructure/

"Is there a statutory basis for planning to seek to minimise impacts on biodiversity and provide net gains in biodiversity where possible?

Yes.

Section 40 of the Natural Environment and Rural Communities Act 2006, which places a duty on all public authorities in England and Wales to have regard, in the exercise of their functions, to the purpose of conserving biodiversity. A key purpose of this duty is to embed consideration of biodiversity as an integral part of policy and decision making throughout the public sector, which should be seeking to make a significant contribution to the achievement of the commitments made by Government in its Biodiversity 2020 strategy…

The National Planning Policy Framework is clear that pursuing sustainable development includes moving from a net loss of biodiversity to achieving net gains for nature, and that a core principle for planning is that it should contribute to conserving and enhancing the natural environment and reducing pollution."

A clear statement that development should achieve measurable net biodiversity gain would bring the policy in line with existing NPPF and NERC Act 2006 requirements, and would work towards achieving “Environmental Gain” as set out in the Government’s new 25 Year Environment Plan.

• **The Policy should also state the need to implement the mitigation hierarchy in order to achieve a measurable biodiversity net gain.** To be more clearly to be compliant with the NPPF, development should seek to (in this order):
- Avoid significant harm to biodiversity (i.e. is there a suitable alternative to development which avoids the impact?)
- Mitigate – all possibilities to be put in place
- Compensate: **on-site first** to ensure net gain in biodiversity; **off-site compensation a possibility thereafter**, only after other options exhausted.

Buckinghamshire and Milton Keynes Natural Environment Partnership (The “NEP”)
Response to the Draft London Plan

Paragraph 118 of the NPPF states that compensation should only be sought after all options to avoid and mitigate are put in place.

NPPF Para 118

“…if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused…”

• **The Policy should refer to the Defra metric or a locally-approved biodiversity metric to determine the measurable impact on biodiversity.** Using the Defra-derived metric or other locally-recognised and approved metric ensures consistency and allows meaningful monitoring of net gain to take place.

• **The Plan should include a monitoring framework into the long-term** to ensure that the proposed measurable net gains in biodiversity are actually achieved, with remedial measures for not achieving satisfactory conditions within stipulated timeframes.

Policy G6, Para 8.6.2 – The NEP welcomes the recognition of the need to establish an “appropriate maintenance regime” to maintain or enhance the wildlife value of sites. The NEP recommends that such maintenance should be secured into the long term, and sit alongside an appropriate monitoring framework (see above).

User:	Rosalind Readhead

I believe using open green space for housing is unnecessary and counter to the 'Good growth' aim. Gardens are vital for biodiversity, Healthy soils store carbon and mitigate flash flooding. I support densification of the Outer boroughs but within their current footprint. We must not lose small green spaces and back gardens when car parking has such a high footprint.(6.8 million car parking spaces in London taking up a minimum of 78.5 km sq).

https://londontransportdata.wordpress.com/category/subject/parking/

User:	Redington Frognal Neighbourhood Forum

Policy G6 Biodiversity and access to nature

G6 A The following sentence is recommended for deletion. “The greatest protection should be given to the most important sites”, along with all of point C [“Where harm to a SINC……..biodiversity impacts.”] The following sentence should be added to the beginning of G6 D, “All new development should seek to achieve a net gain in biodiversity”.

G7 C tree felling. Veteran trees, mature trees and hedgerows and ancient woodland are a vital part of London’s green infrastructure and there should be strict controls over felling them in Policy G7. The first sentence should be re-written as follows: “Development proposals should ensure that existing trees of quality, mature trees and hedgerows, and trees of value in terms of delivering ecosystem services, such as biodiversity support, water or air quality management, are retained.”

User:	Mr Jon Halse

Policy G6. Biodiversity and access to nature. I support this policy. I recommend that Sites of Metropolitan Importance and all ancient woodlands are added to the categories of planning applications that must be referred to the Mayor.

User: CPRE London

Biodiversity

The approach to biodiversity and access to nature outlined in Policy G6 needs to be strengthened to avoid the loss of valuable habitats and wildlife.

Proposed change:

Policy G6 – The second sentence in sub-section A of this policy should be deleted, along with the whole of sub-section C. The following sentence should be added at the start of sub-section D **'All new development should seek to enhance biodiversity.**' **.**

Rationale: All Sites of Importance for Nature Conservation (SINCs) are precious and deserve to receive the highest level of protection. There should be no provision in policy which would allow development to harm a SINC regardless of their supposed relative significance. It is unlikely to be possible to compensate for the loss of biodiversity through alternative 'off-site' provision as the value of a site is often intimately connected with its location.

User:	Ruth Tattum

Policy G6. Biodiversity and access to nature. I support this policy. I recommend that Sites of Metropolitan Importance and all ancient woodlands are added to the categories of planning applications that must be referred to the Mayor.

User: Mill Hill Preservation Society

On the positive side we are encouraged by the promises of Green Belt protection and the plan to increase open space and wooded areas. However, the test for this policy locally will be the schools proposal by Hasmonean at Copthall, where Green Belt is under threat from two schools. Elsewhere additional undesirable sports facilities are planned on woodland. The approach to biodiversity and access to nature outlined in Policy G6 needs to be strengthened to avoid the loss of valuable habitats and wildlife. Our experience is that green spaces are being whittled away by roundabouts, car parking and development. We are pleased that the draft plan recognises the importance of green spaces but adequate protection needs to be ensured, and extended to public and private gardens.

User:	Claire Mellish

The approach to biodiversity and access to nature outlined in Policy G6 needs to be strengthened to avoid the loss of valuable habitats and wildlife. Proposed change: Policy G6 – The second sentence in sub-section A of this policy should be deleted, along with the whole of sub-section C. The following sentence should be added at the start of sub-section D ‘All new development should seek to achieve a net gain in biodiversity.’

User: The Surrey Hills

CCB response on Policy G6 Biodiversity and access to nature

Chapter 8 of the Plan should look beyond London's boundaries to recognise the value and accessibility of the nationally protected landscapes that are on London's doorstep. The plan currently fails to mention the protected landscapes that ring London: the Chilterns Area of Outstanding Natural Beauty (AONB), Surrey Hills AONB, Kent Downs AONB, High Weald AONB, Dedham Vale AONB and the South Downs National Park. These should be recognised as breathing spaces of strategic importance for London. They are nationally protected assets and some of the finest landscapes in the UK. As well as providing clean air, clean water and local food and drink products, they provide opportunities for peace and adventure, like walking, cycling, horse-riding and watching wildlife. Many of these experiences are completely free, accessible to all, and of great value for health and wellbeing. In particular the Chilterns AONB is the only National Park or AONB that is on the tube line (stops at Amersham, Chesham) and is within an hour's journey for 10 million people. For more information please see http://www.landscapesforlife.org.uk/about-aonbs/visit-aonbs/ and http://www.chilternsaonb.org/

User: London Environment Directors' Network (LEDNet)

Policy G6 Biodiversity and access to nature

Part B 1) references the need to identify 'green corridors'; this should be aligned with policies related to the All London Green Grid and local ecological networks. B 3) references 'habitats of particular relevance in an urban context'; this is unclear, and many areas of London are not urban. We therefore suggest the following amendment:

B 3) seek opportunities to create habitats that are of particular relevance and benefit in ~~an urban~~ **the local** context

We believe the text of C 2) should be removed, as it potentially supports partial development of SINCs. Many SINCs are small and vulnerable to quite minor changes, and once land has been developed, the opportunity for it to be restored is lost. In addition, we propose a change to the wording of C to address cumulative impacts:

C Where **direct, indirect or cumulative** harm to a SINC (other than a European (International) designated site) is unavoidable, the following approach should be applied to minimise development impacts:

~~2) minimise the spatial impact and mitigate it by improving the quality or management of the rest of the site~~

Finally, we note that an up to date map of SINCs (including Special Protection Areas, Special Areas of Conservation and Sites of Special Scientific Importance) should be included within the new London Plan, and that a map of areas of deficient in access to nature would also be useful.

User: London Wildlife Trust

We welcome the general aims of Policy G6 but we remain concerned that, as currently drafted, it is passive and **will not secure net gain for biodiversity** let alone drive no net loss in London. There are a number of weaknesses that undermine its objectives, and which do not assist in meeting the Mayor's commitments to securing net gains in greenspace and greater protection for wildlife sites:

- It implies in part A that biodiversity is only found in SINCs rather than across Greater London;
- There is no reference to securing no net loss, let alone seeking to secure net biodiversity gain;
- Part A should require London boroughs to take a strategic spatial planning approach to biodiversity and to commit to securing biodiversity net gains13;
- Reference under Part B to green corridors is not referenced anywhere else outside this policy, nor how this aligns with NPPF objectives regarding ecological networks;
- We are unsure what the reference in clause B3 to "*habitats of particular relevance in an urban contex*t" means, especially bearing in mind that significant areas of London are not urban;
- Part B should make an explicit reference to requiring the availability of a up to date evidence base to inform policy and planning decisions in in line with the NPPF14;
- Part C appears to rule out off-site compensation; if this not viable where then? Clause C3) requires better legibility.
- We recommend that planning applications that are on or adjacent to Sites of Metropolitan Importance or irreplaceable habitats (e.g. ancient woodland) outside SMIs are added to the categories that must be referred to the Mayor.

The New London Plan must take a more **ambitious approach to protecting and restoring nature** to better reflect the intrinsic importance of biodiversity and its benefits to society.

We are concerned that the policy does not adequately distinguish between **legally protected wildlife sites** (SPAs, SACs, Ramsar sites, SSSIs, National Nature Reserves, and Local Nature Reserves) and **Sites of Importance for Nature Conservation** (SINCs) which sit below nationally and internationally designated sites and comprising Sites of Metropolitan, Borough and Local Importance for Nature Conservation. SSSIs are subject to a statutory designation, selected using clear guidelines against which they must be deemed sites of national importance to qualify for designation, and there are legal controls on what activities can be allowed within them.15

As drafted, Policy G6 potentially conflates SINCs with internationally important sites (SPA, SACs and Ramsar sites) and nationally important sites (SSSIs and NNRs), and could lead to confusion although all are a material planning consideration. The general principle of avoiding damage and seeking to conserve and enhance wildlife applies to all sites (statutorily protected sites and SINCs), however, these sites are subject to different levels of legal and policy protection (for example, international sites also benefit from the provisions of NPPF para 119) and it is important this is reflected. The Plan should consider having a separate section on legally protected wildlife sites (SSSIs, SPAs, SACs, Ramsar sites).

There is also a need to strengthen the rigour of policy to address weaknesses in the development control process. There is evidence that planning applications are being determined on a disproportionately poor,

evidence base. Work commissioned by the GLA in 2016 found that up to 18% of planning applications in Greater London could have an adverse effect on biodiversity, while only 1% made use of a data search from the capital's environmental records centre, Greenspace Information for Greater London. The report recommended that London boroughs should publish on-line maps of areas close to SINCs, priority habitats and priority species, within which access to biodiversity evidence would need to be demonstrated by the applicant for both major and minor housing and infrastructure developments.16

Boroughs also need to have access to better ecological expertise to support the implementation of the Plan through Local Plan policies and decisions. A study by the RSPB and The Wildlife Trusts - *Nature Positive Local Plans* (2015) - highlighted that more needs to be done to significantly and cost effectively improve the performance of local plans (of which three reviewed were from London) in relation to biodiversity protection and enhancement.17

We believe there are merits in establishing a professional advisory service similar to that once provided by the London Ecology Unit to provide support to boroughs (as has been raised in London Assembly investigations on the Mayor's Biodiversity Strategy18); London Wildlife Trust is keen to discuss this further with the Greater London Authority as to how this may assist the Mayor meeting his ambition to achieve 50% greenspace cover.

The London Plan must be also underpinned with additional Key Performance Indicators to help monitor the performance of Plan policies in respect of biodiversity losses or gains and change in greenspace. Those set out in Chapter 12 do not address this.

Finally, we believe it is important that this policy is extended to selected ‘Minor’ applications (in the sense of planning application type coding), as the cumulative impact of these applications may far exceed the impacts of ‘Major’ developments. For example in the London boroughs of Ealing, Southwark and Camden, the number of ‘Minor’ housing applications exceeded ‘Major’ applications in 2014 by a ratio of around 25 to 1, while the area covered by these respective application types in the Borough of Ealing was around 19 to 1.

We therefore recommend that **Policy G6 is significantly amended** as follows:

A Policies and proposals must aim to secure net biodiversity gain. Sites of international importance, Sites of Special Scientific Interest (SSSIs) and Sites of Importance for Nature Conservation (SINCs) should be protected. The greatest protection should be given to the most significant sites.

B In developing Development Plan policies, boroughs should:

1) use the relevant procedures to identify ecological networks, (including protected wildlife sites (such as SSSIs and SINCs) and ~~green~~ connecting ecological corridors). When undertaking comprehensive reviews of SINCs across a borough or when identifying or amending Sites of Metropolitan Importance boroughs should consult the London Wildlife Sites Board

2) identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them

3) seek opportunities to create and restore habitats that are of particular relevance and benefit in ~~an urban~~ the local context

4) include policies and proposals for the protection, ~~and~~ conservation and, where possible, net gain of priority species and habitats and opportunities for increasing species populations

5) ensure sites of European or national nature conservation importance are clearly identified and appropriately assessed. Draft New London Plan; *London Wildlife Trust response, March 2018*

6) ensure that applications in, adjacent or near to SINCs, priority habitats or priority species, to access the best available and consistent evidence base on biodiversity, to allow an informed decision to be made.

C Development on land within or outside statutorily designated sites (including SSSIs, SPAs and SACs (either individually or in combination with other developments)) should not normally be permitted.

1) boroughs have a duty to consult Natural England before granting planning permission on any development that is in or likely to affect a statutorily designated site

2) in the case of a European (international) designated site where compensatory provision is identified as the only potential solution, it is necessary to demonstrate that the development would not adversely affect the conservation status of the site, there are no alternatives to the European site and that Imperative Reasons of Overriding Public Interest (IROPI) exist which justify why the project should proceed.

D Developments which would cause direct, indirect or cumulative harm to a SINC should not be permitted unless the benefits of the development proposal can be clearly demonstrated to outweigh the biodiversity impacts. In such cases the following approach ~~Where harm to a SINC (other than a European (International) designated site) is unavoidable, the following approach~~ should be applied to minimise development impacts:

1) avoid adverse impact to the special biodiversity interest of the site

2) minimise the spatial impact and mitigate it by improving the quality or management of the rest of the site

3) seek appropriate off-site compensation only in the exceptional cases where the benefits of the development proposal can be clearly demonstrated to outweigh the biodiversity impacts

E Opportunities for biodiversity enhancement aimed to secure net gain should be considered, identified and mapped at design and planning stage from the start of the development process.

*F Proposals which create new or improved habitats that result in **net** positive gains for biodiversity should be considered positively, as should measures to reduce deficiencies in access to wildlife sites.*

13 As demonstrated by the latest iteration of the New Southwark Plan (2018).

14 NPPF para 165: *Planning policies and decisions should be based on up-to-date information about the natural environment and other characteristics of the area including drawing, for example, from River Basin Management Plans. Working with Local Nature Partnerships where appropriate, this should include an assessment of existing and potential components of ecological networks. A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.*

15 See also NPPF para 118.

16 www.london.gov.uk/sites/default/files/biodiversity_and_planning_research_report_0.pdf

17 www.wildlifetrusts.org/sites/default/files/files/275-0618-15-16_%20Nature%20Positive%20Plans%20report(1).pdf

User:	London Wildlife Trust

In respect of para 8.6.1, Sites of Local Importance are not simply access focused; they have a local wildlife value as well.

Attached to para 8.61. (Sites of Importance for Nature Conservation) we recommend there should be a map showing the five levels of SINCs, and/or a table listing the strategically important sites (European/international, national (SSSIs), Sites of Metropolitan Importance).

User:	London Wildlife Trust

"wide variety if important wildlife habitats" should make more explicit reference to the ‘Lawton principles’ under *Making Space for Nature*, therefore seeking to expand the size, quality, number and connectivity of habitats, of which the identification, management and protection of ecological corridors (rather than just green) is part of this.

User: The Royal Society for the Protection of Birds (RSPB)

Policy G6 is the key biodiversity policy within the draft Plan. However there are a number of weaknesses which must be addressed before the policy is adopted. **We are concerned that, as currently drafted, policy G6 is a passive policy that will neither drive No Net Loss nor Net Gain of biodiversity in London.** The 25 Year Environment Plan has an action to ensure that existing requirements for net gain for biodiversity in national planning policy are strengthened. We strongly recommend that the Mayor aims to take the lead on and be ambitious on biodiversity and require all developments to deliver a net gain for biodiversity. **Part D of policy G6 could be strengthened in this respect**. In establishing a net gain approach for London the Mayor must respond to the **key tests set out in Annex 2 of this response**.

We are also concerned that the Plan and this policy does not adequately distinguish between **legally protected wildlife sites** (including SSSIs, SPAs, SACs and Ramsar sites) and **Sites of Importance for Nature Conservation** (SINCs) which sit below nationally and internationally designated sites and comprise Sites of Metropolitan Importance, Sites of Borough Importance and Sites of Local Importance. SSSIs are subject to a statutory designation, are selected using clear guidelines against which they must be deemed sites of national importance to qualify for designation, there are legal controls on what activities can be allowed within them and they are also a material consideration in the planning system.

We are concerned that policy G6 could lead to confusion by conflating SINCs with nationally important sites (SSSIs and NNRs) and with internationally important sites (SPA, SACs and Ramsar sites), although all are a material planning consideration. While, the general principle of avoiding damage and seeking to conserve and enhance wildlife applies to all sites (legally protected sites and wider SINCs), these sites are subject to differing levels of legal and policy protection (for example, in addition international sites also benefit from the provisions of paragraph 119 of the NPPF) and it is important this is reflected.

The Plan should have a separate policy / section on legally protected wildlife sites (SSSIs, SPAs, SACs, Ramsar sites). **A more appropriate generic term** (other than SINCs) to encompass legally protected wildlife sites and SINCs could be along the lines of **protected wildlife areas**.

In respect of policy point E we recommend including further clarification around habitat creation to indicate how biodiversity will be measured and to ensure the mitigation hierarchy is followed to avoid and mitigate impacts on existing biodiversity. Compensation/offsetting should be considered a last resort and not be used to give licence to destroy habitats within a development site. Consideration of habitat type, local conditions and connectivity must be taken when creating new habitats and if these are used in offsetting scheme, new habitats must be of at least equal value to the habitats being lost. There should not be any trading down of habitats.

Further to our key points above, we propose some changes to Policy G6, to reflect the need for a spatial approach[8] and to support delivery of biodiversity net gains, in line with the mitigation hierarchy.

Suggested amendments to Policy G6 [amendments in bold, italics]

We recommend the addition of new policy text:

'London Boroughs should set out specific policies to contribute to the habitat creation and restoration targets identified for London'.

Section A

We recommend that wording of section A is strengthened and requires that:

'***the*** *Sites of Importance for Nature Conservation (SINCs)* ***network*** *should be protected,* ***enhanced and restored.*** *The greatest protection should be given to the most significant sites'.*

Section B

‘*In developing Development Plan Policies,* ***Area-Based Plans, Opportunity Areas and other Planning Frameworks,*** *boroughs should:*

1) *use the relevant procedures to identify SINCs and ~~green~~* ***connect ecological*** *corridors. When undertaking comprehensive reviews of SINCs across a borough or when identifying or amending Sites of Metropolitan Importance boroughs should consult the London Wildlife Sites Board*

2) *Identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them*

3) ***Identify, map and promote*** *~~seek~~ opportunities* ***to extend, restore, buffer and join-up the SINCs network and*** *~~to~~ create habitats that are of particular relevance and benefit in ~~an urban~~* ***the local*** *context*

4) *Include policies and proposals for the protection and ~~conservation~~* ***recovery*** *of priority species and habitats in line with* ***section 41 (England) of the NERC Act (2006).***

5) *Ensure sites of European or national nature conservation importance are clearly identified and appropriately assessed* ***and protected.***

Section C

The wording of section C should be amended as follows:

‘***There should be a strong presumption against damaging a Site of Importance for Nature Conservation (SINC) in line with paragraph 118 of the NPPF.***

Where harm to a SINC (other than a European (International) designated site) is unavoidable, the ~~following~~ approach ~~should be~~ applied to minimise development impacts ***should follow the NPPF mitigation hierarchy.***

~~1) avoid adverse impact to the special biodiversity interest of the site~~

~~2) minimise the spatial impact and mitigate it by improving the quality or management of the rest of the site~~

~~3) seek appropriate off-site compensation only in exceptional cases where the benefits of the development proposal clearly outweigh the biodiversity impacts.'~~

Section D

The wording of section D should be amended as follows:

'***Opportunities for*** *biodiversity enhancement should* ~~*considered*~~ ***be identified and mapped at design and planning stage*** ~~*from the start of the development process*~~ ***with an aim to deliver net positive biodiversity gains.'***

Section E

The wording of section E should be amended as follows:

'*Proposals which create new or improved habitats that result in* ***net*** *positive gains for biodiversity should be considered positively, as should measures to reduce deficiencies in access to wildlife sites'*

Add an additional policy point on the need to demonstrate access to biodiversity evidence as part of planning applications.

8 The NPPF requires in paragraph 114 that local planning authorities 'set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity'.

User:	The Royal Society for the Protection of Birds (RSPB)

Paragraph 8.6.1 should refer to article 6 (3) and (4) of the Birds and Habitats Directive which sets down the procedure to be followed when planning new developments that might affect a Natura 2000 site.

User:	The Royal Society for the Protection of Birds (RSPB)
Supporting text in paragraphs 8.6.2 and 8.6.3 should refer to **ecological** corridors instead of green corridors.	

User:	The Royal Society for the Protection of Birds (RSPB)
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C) Sustainable homes for people and wildlife

The 25 Year Environment Plan (page 35) includes commitments to ensure that '*new development will happen in the right places, delivering maximum economic benefit while taking into account the need to avoid environmental damage…'* and achieve '*high environmental standards for all new builds…'*. **We strongly support those commitments.**

Provided it is located in the right place and planned with nature in mind, housing can be delivered in harmony with nature. Our collaboration with Barratt developments plc on a 2,500-home development in Aylesbury (known as Kingsbrook) provides a great example of how biodiversity can be built into new housing developments at scale (see the case study in **Annex 1** for more details). Kingsbrook has been included as a case study in recently published 25 Year Environment Plan (see page 147). It is also in the TCPA Planning in the Planning for green and prosperous places guide9. We would be pleased to work with the Mayor and partners to build on our expertise at Kingsbrook and demonstrate how housing can be planned, designed and managed for people and nature.

It is essential that the Mayor sets a strong policy framework and requires all new developments to be designed to the highest sustainability standards and for all developments to deliver net biodiversity gains following robust application of the mitigation hierarchy set out in paragraph 118 of the NPPF. Consideration should be also given to how the existing housing stock can be retrofitted to support biodiversity enhancements. We recognise that the draft Plan includes a number of policies which seek to deliver high sustainability standards, including *GG6: Increasing efficiency and resilience*, *SI2: Minimising greenhouse gas emissions*, *SI3: Energy Infrastructure*, *SI5: Water Infrastructure* and *SI12: Sustainable Drainage*. These policies could be better referenced throughout the Plan including in **Chapter 3: Design** and **Chapter 4: Housing**. We would also like policy wording to be strengthened i.e. ***requiring*** rather than ***aiming*** for particular standards. In line with earlier comments, we strongly recommend the Mayor seeks a similarly high level of ambition in respect of biodiversity, seeking biodiversity net gains at scale through a strategic approach and in respect of individual developments.

Biodiversity net gains could mainstream nature friendly features in housing developments such as seen at Kingsbook. A list of minimum requirements could apply to all housing developments to ensure a net gain for biodiversity on every scheme. With appropriate signage and education this could also encourage people living within these new developments to connect with nature. **There are a number of key tests which should apply to a biodiversity net gain approach which we have set out in Annex 2.**

9 https://www.tcpa.org.uk/Handlers/Download.ashx?IDMF=335bdb7f-e581-4d7c-9e5f-62605d62acdb

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User:	Frances High

- Policy G6. Biodiversity and access to nature. I support this policy. I recommend that Sites of Metropolitan Importance and all ancient woodlands are added to the categories of planning applications that must be referred to the Mayor.

User:	Mr Andrew Garrod

Policy G6. Biodiversity and access to nature. I support this policy. I recommend that Sites of Metropolitan Importance and all ancient woodlands are added to the categories of planning applications that must be referred to the Mayor.

User:	West London River Group

We support this policy and recommend that Sites of Metropolitan Importance including all ancient woodlands are added to the categories of planning applications that should be referred to the Mayor.

User:	Mr Paul McQuillen

The approach to biodiversity and access to nature outlined in Policy G6 needs to be strengthened to avoid the loss of valuable habitats and wildlife. **Proposed change:** Policy G6 – The second sentence in sub-section A of this policy should be deleted, along with the whole of sub-section C. The following sentence should be added at the start of sub-section D **'All new development should seek to achieve a net gain in biodiversity.**'

User:	The Forestry Commission

G6 Biodiversity & access to nature – London’s Urban Forest is a key opportunity for place making and community engagement/involvement e.g. tree planting, local woodland management, empowering people and businesses to water street trees outside their property. We support the more detailed responses on this from Natural England and Environment Agency.

User: London Borough of Sutton

SUPPORT WITH CONDITIONS. The London Borough of Sutton supports Policy G6 and acknowledges that each boroughs' Development Plan is key to implementation, under a broad and holistic umbrella, applied across London to provide joined up thinking, in line with the recommendations from the Lawton Review (2010) and the 25 Year Environment Plan (2018).

Under point A, it is agreed that there should be a proportionate approach to site protection through site hierarchy but this should also recognise that sites of lower (or no) designation should receive increased weighting, when evaluated locally, based on the isolation through urban fabric around the site and habitats and species on site. That is, 'islands' of what may be judged from an on site evaluation as of 'lower biodiversity value', may be of greater importance, based on the fact that they are isolated and provide a refuge from urbanisation i.e. consideration of the effects at a local landscape scale. Protection of common species and habitats (cf. house sparrow declines) is as important as protected species as they comprise a higher biomass. Biodiversity Accounting will aid this evaluation.

Under point C, 'Where harm to a SINC...is unavoidable' does not take into account the necessity to test whether there are alternative sites that could be used, before determining
that a SINC has to be used. There should be a presumption against development of designated sites unless there is overwhelming evidence that it is required. Only then should
the mitigation hierarchy be applied.

Under point C, the mitigation hierarchy of avoid, mitigate and compensate is followed. An additional point should be added before 1) ‘avoid’; this should be ‘Assess’, following the
development of Biodiversity Accounting for no net loss and net gain, as espoused under the NPPF (para 109: ‘minimising impacts on biodiversity and providing net gains where
possible’) and recent CIRIA / CIEEM guidance . In this way, biodiversity 3 loss and gain can be objectively determined and utilised in considerations as to whether ‘the benefits of the
development proposal clearly outweigh the biodiversity impacts’ (policy G6 C3). Biodiversity Accounting should also be utilised at a mandatory level across London, which
can be honed by each borough (as per Policy G5), as too often Policy 6 D is only retrospectively applied, after planning permission has been granted, as validation lists do not
currently fully address requirements for the consideration of biodiversity. Biodiversity Accounting can be implemented, as with Policy G5, starting at major applications and
thresholds lowered through borough Local Plans, as required.

Under point E, reducing deficiency to access is, broadly agreed but needs to be balanced through local decision-making against the fragility of any existing, new or enhanced habitats,
as public pressure can be a major factor in the reduction of the biodiversity value of sites.

User:	Patrick Mossop

Policy G6. Biodiversity and access to nature. I support this policy. I recommend that Sites of Metropolitan Importance and all ancient woodlands are added to the categories of planning applications that must be referred to the Mayor.

User:	London Borough of Newham

Policy G6 Biodiversity and access to nature

LBN are generally supportive of the policy, including the introduction of the urban greening factor, which is complementary to Newham's Draft Revised Local Plan. The reference to support with and procedures relating to designation and protection of SINCs is welcomed.

However, LBN question the relevance of the 'Areas of deficiency in access to nature' as opposed to a more general net biodiversity increase approach, given potential conflict between increased use and biodiversity protection.

User:	CFGN Community Food Growers Network	
	Amends	Justification
Policy G6 **F**	**Add *‘The value of gardens, allotments and pasture in providing biodiversity and access to nature should be recognised in all proposals and local decisions’***	**There is good evidence that food growing provides wildlife habitats, promotes healthy lifestyles and better mental health, as well as clean air. For example Capital Growth gardens, supported by the Mayor of London and the previous London Plan, have provided over 150,000 people access to nature and created over 70 hectares of biodiverse green space.**

User:	North London Waste Authority
NLWA notes and supports the application of this approach to Sites of Nature Conservation where appropriate across the capital.	

User: Barnet Society

Para 8.6.2

We agree fully with the protection of wildlife habitats including ‘vegetated railway corridors’, and would like to add that excessive clearance of, or damage to, trees and plant growth along railway and road corridors (including grass verges) should be avoided.

User:	Barnet Society

Para 8.6.5

We would like canals to be mentioned explicitly, for the avoidance of doubt.

User:	Landscape Institute London
B 5) – We note the uncertainty about European designations post-Brexit. Also at 8.6.1.	

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User:	Landscape Institute London
C – LI London is concerned that it appears to be acknowledged that situations will arise where SINCs are going to be subject to ‘unavoidable damage’, presumably because certain types of development (e.g. HS2) will take priority over SINC sites. How is ‘unavoidable’ damage to a SINC to be decided?	

User:	Landscape Institute London

E – It would be helpful if the London Plan could clearly state that there will be a requirement for before and after comparative surveys / assessments, to enable a comparison to be made for a site, as recommended in the Ecology Consultancy's supporting document, such as Phase 1 Habitat Survey or BREEAM assessments?

User: London Beekeepers' Association

Comments on Policy G6

? We believe that it is important that this Policy is properly enforced. ?The approach to biodiversity and access to nature outlined in Policy G6 needs to be strengthened to avoid the loss of valuable habitats and wildlife.

? We support Policy G6 A about protection of SINCs.

? We especially support the specific mention of green corridors, as these can be disproportionately valuable for biodiversity (and bees) and for the well-being of residents and visitors.

? in this regard, LBKA has supported the “Making a B-Line for London” partnership that aims to develop B-Lines across London, increasing the diversity and abundance of pollinating insects across its green spaces and gardens (see https://www.buglife.org.uk/b-lines-hub/making-a-b-line-for-london?). This project is currently seeking further funding.

? Off-site compensation is not supported, as it does not adequately compensate for the loss of on-site green space and associated biodiversity.

? Policy G6 D should be re-worded as “All new development should seek to achieve a net gain in biodiversity, and this b?iodiversity enhancement should be considered from the start of the development process. The importance of “no net loss of biodiversity” cannot be over-estimated.

? Brownfield land is an important habitat for many species including bees. Several national rare or scarce bees exist in Greater London and depend upon brownfield habitats for their survival, as do Black Redstarts. Before brownfield land is redeveloped, sites must be surveyed through a professional Environmental Impact Assessment to ensure that biodiversity is not inadvertently lost.

User: Bexley Natural Environment Forum

Under Policy G6, C1 we note that you say that avoidance of adverse impacts to biodiversity should occur. It is impossible for any development to not adversely impact wildlife areas and therefore stronger measures need to be put in place to mitigate these effects than currently exist. Too many sites, particularly Sites of Importance for Nature Conservation, which have no legal standing, are allowed to be devastated or partially destroyed with only the minimum of recourse.

In Point D we believe the word should be replaced by must, so giving more emphasis to the protection of sites. Currently the sentiment is to weak and giving developers too much opportunity to ‘say’ they have given it consideration, but generally have no interest or desire to include such provisions. Penalties need to be strengthened to insure that consideration is given.

User: Highgate Society

G6A - Object

Strengthen wording to insist SINCs “must” be protected, and remove scaling of proposed protection so that all sites benefit, not just those deemed most significant.

G6B .1 Comment

On identifying SINCs or Sites of Metropolitan Importance, Boroughs “will be required to consult not just London Wildlife Sites Board, but also other relevant organisations, particularly those with local knowledge and experience” and especially those responsible for the management of ecological spaces, such as the City of London, the Royal Parks, etc., as well as relevant community groups.

G6C Comment

Where harm is unavoidable to a SINC, the mitigating procedures that are outlined “must” apply, not just the vaguely aspirational “should” apply .

G6C.1 Comment

“Avoid adverse impact …” This is the first mitigating procedure where harm is unavoidable – if there is harm, there is adverse impact. This should be re-worded to say: “There should be no adverse impact…”

G6E – Support and comment:

This is for new proposed sites, and this should be encouraged. New green habitats should be approved by strict tests set by outside expert bodies, not just the council involved and certainly not solely on the word of the developer.

However, “should be considered positively” is, in effect, meaningless in a planning context and will be ignored. This should be replaces with “should be given preference, and adequate provision of such habitats should be required where they are not a part of a development proposal.”

User:	London Borough of Ealing

Clause B of this policy essentially comprises directive policies for LPAs when preparing their Development Plans. Whilst these are supported, where such policies are absent awaiting their preparation, a policy vacuum will exist in the interim.

This could be addressed through rewording the policy to make it clear that certain aspects of this policy apply now when considering development proposals.

User: Natural England

We support the measures in this policy which relate to alleviating deficiency in access to nature, protecting SINCs and protecting and creating other new habitats. However, we consider that the Policy could be significantly strengthened in order to facilitate the achievement of the objectives set out in the London Environment Strategy.

A number of organisations within London have adopted a biodiversity net gain approach, including the London Legacy Development Corporation and Transport for London and initiatives such as Greening the BIDs have demonstrated that a significant scope for additional greening in even high density urban environments (Natural England, 2013), which could be used to support gains in biodiversity. A net gain approach would be consistent with Chapter 1 of the recently published 25 Year Environment Plan which states that the government will *'embed an 'environmental net gain' principle for development, including housing and infrastructure'.* For London to be declared the first National Park City, it is our opinion that gains in biodiversity should be an integral part of this.
Natural England strongly advises that policy wording is included which ensures that all development within London (major and minor) should result in a net gain in biodiversity, as would be consistent with Paragraph 109 of the NPPF and the 25 Year Environment Plan.

Key recommendation:
Policy G6 is a suitable location to draw together policy from the Spatial Development, Housing and GI & Natural Environment chapters by establishing a net gain principle for all development. We recommend that point D of this Policy is amended to read *'All development should result in a net gain in biodiversity. To ensure that this is delivered, biodiversity enhancement should be considered from the start of the development process.'* We also recommend that this measure is cross-referenced in policies GG2, H1 and H2 to ensure that it is fully embedded within planning policy.

We strongly support the protection afforded to SINCs, which are integral to maintaining functioning ecological networks within London, as well as facilitating continued public access to nature. In particular, we support the use of the mitigation hierarchy as described in Section C of this policy, in order to minimise harm to SINCs as far as is possible.

SSSIs, SACs, SPAs, and LNRs harbour some of London’s greatest biodiversity, and whilst it is a legal requirement to avoid significant harm to such sites, planning policy should ensure that site protection is considered at the earliest possible stage in the planning process. Please see our recommendations below.

For many residents of London, gardens play a vital role in providing access to nature, as well as maintaining ecological and climate resilience. However gardens may be vulnerable to infill development on small sites. Please refer to our comments on Policy H2 for additional comments on this issue.

Natural England believes that green corridors and other proposals outlined in the All London Green Grid (ALGG) could help improve access to nature, if their potential contribution is fully considered as part of OAPFs and the ‘growth corridor’ framework described in Policy SD1 of the Plan. This would also contribute to fulfilling Proposal 5.1.1c of the London Environment Strategy. Please refer to our comments on Policy SD1 for further detail.

We also note that this Chapter of the Plan contains no specific measures for increasing community involvement in the improvement and management of London’s greenspaces, as would otherwise contribute to fulfilling Proposal 5.1.1f of the London Plan.

Recommendations:

- Establish a biodiversity net gain approach for all development, as described above (‘key recommendation’)
- We strongly recommend that the policy makes provisions for potential impacts to SSSIs, SACs, SPAs and LNRs to be considered at the earliest possible stage of the planning process. In order to provide clarity to both developers and local policy-makers it should also be stated that development proposals should be refused where they will result in an adverse impact on European sites, either alone or in-combination with other plans or projects, or result in significant impacts to nationally designated sites. This would contribute to protecting a core network of nature conservation sites as described in Policy 5.2.1 of the London Environment Strategy
- An additional section of this policy under B to read *‘6) consider how existing and newly created habitats can secure funding for appropriate management, and seek opportunities for community involvement in management activities’*
- As per the Environment Agency’s response, under paragraph 8.6.2, we recommend adding to the last sentence to emphasise the role of development plans and proposals in considering opportunities for restoring and creating linkages between sites of nature conservation importance, and thereby reducing habitat fragmentation.

User: Grafton Group Plc

We support recognition of the importance of Sites for Nature Conservation (SINCs). The future role and value of such sites should be a material consideration of great importance when considering land uses on sites in close proximity to SINCs. For Orchard Wharf this should include the impact of an ongoing safeguarding on the SINC through the forthcoming SWR.

We consider that redevelopment of Orchard Wharf can deliver significant benefits to the ecological value of the East India Dock Basin SINC which adjoins the site.

User: CIBSE

We cannot comment on measures in detail but support the overall objectives for biodiversity protection and enhancement.

We would welcome stronger policies and clear objectives for biodiversity enhancements, linked to monitoring as part of the Plan's KPIs – see also our response to Chapter 12 – Monitoring. See also overall chapter comment on maintenance.

User: London Friends of Greenspaces Network

15. G6 The approach to biodiversity and access to nature outlined in Policy G6 needs to be strengthened to avoid the loss of valuable habitats and wildlife.

Proposed change:

Policy G6 – The second sentence in sub-section A of this policy should be deleted, along with the whole of subsection C. The following sentence should be added at the start of sub-section D ‘All new development should seek to achieve a net gain in biodiversity.’

Policy G6B2 to be amended: Change ‘ie’ to ‘eg’.

Rationale: Biodiversity ‘offsetting’ is a flawed, controversial and highly worrying option. We support submissions made by Friends of the Earth on this matter. In particular, all Sites of Importance for Nature Conservation (SINCs) are precious and deserve to receive the highest level of protection. There should be no provision in policy which would allow development to harm a SINC regardless of their supposed relative significance. It is unlikely to be possible to compensate for the loss of biodiversity through alternative ‘off-site’ provision as the value of a site is often intimately connected with its location.

User: Mr Chris Rose

B3 add ' these include 'brownfield' (open mosaic) habitats'.

B4 include policies and proposals for the protection and conservation of priority species and habitats and opportunities for increasing species populations

Increase populations - GOOD! but para doesn't quite read right. Delete 'opportunities' to make it absolutely clear the policies should seek to deliver that outcome.

C Harm is never unavoidable - unless you're one of these quasi-religious growth fetishists.

C2 is about cramming more wildlife into less space, with is the de facto policy of this plan and of Bexley's 'growth strategy'. This is not a credible or workable long term approach.

C3 add at end ... any translocations should be within the Borough itself or, if in another local authority area, as close as possible to the 'donor' site. (This is so that we don't have our key local wildlife shipped miles away for the sake of expedient rush-jobs, as Bexley would be quite happy to do).

User:	Hornsey & Wood Green Labour Party

The approach to biodiversity and access to nature outlined in Policy G6 needs to be strengthened to avoid the loss of valuable habitats and wildlife. Proposed change: Policy G6 – The second sentence in sub-section A of this policy should be deleted, along with the whole of sub-section C. The following sentence should be added at the start of sub-section D ‘All new development should seek to achieve a net gain in biodiversity.’

User: Ms Catherine Day

1. I note that this section of the Draft Plan focuses on green space. This only partially addresses the protection, conservation and enhancement of wildlife and biodiversity in London and is therefore inadequate.

2. A very important wildlife habitat is also the built (i.e. man-made) environment. The Plan should also include a section dealing with buildings as wildlife habitat.

3. There are many species that are dependent on our buildings and structures for shelter, breeding and lifestyle. The new Plan needs specifically to make it a statutory obligation to (a) conserve and (b) help the recovery of these species.

4. I write primarily as an RSPB Swift volunteer. The Common Swift *(Apus apus)* is now Amber-listed as a Bird of Conservation Concern (ref: *BoCC4 (Red List) Dec 2015*).

5. In commmon with the general swift population in England, the Swift population in London has declined dramatically and increasingly sharply. The 2016 Breeding Bird Survey trend figures show a -54% decline between 1995 & 2016 for Swift in London, with the majority of the decline having taken place in only the last 15 years. There was a -4% decline in the year 2015-16 alone.

This level of decline is unsustainable. (ref: bto-jncc-rspb_breeding_bird_survey_trends_2016_-_london).

Swift population trend graphs can be found on the British Trust for ornithology's website:

https://www.bto.org/volunteer-surveys/bbs/latest-results/trend-graphs

I attach two screen shots of each of the relevant table/graph for quick reference.

6. The Swift is **entirely** dependent on buildings for its survival. It breeds **exclusively** in buildings, under the eaves or in crannies high up in buildings.

Swifts are the most site-faithful nesters of any bird species in the UK, meaning that swift nest sites will be used continuously during the breeding season for generation after generation. Swift are long-lived birds and are of breeding maturity only at 4 years old.

Nearlly all of London's remaining swift nest in cavities in older buildings. New building methods and materials exclude all wildlife. Swifts displaced from their nest sites through demolition or renovation will not find new nest sites in 21st-century buildings, or any that have been reproofed and had roof repairs.

Once a nest site is lost, it is lost for good. The bird will not breed that year when it returns from migration and will in all likelihood not find anywhere else near its colony to breed. Owing to the scale and rapidity of change in our housing stock, some of our swift colonies in London are now tiny, consisting of just a few birds; sometimes only a single pair will remain .

7. A requirement should be included in the London Plan for swift nesting bricks and nesting spaces to be built into the fabric of new builds, both housing and in public and commerical buildings. Exeter City Council has such an award-winning policy and can be taken as a good example. The RSPB and the speciallist organisation Swift Conservation can advise readily on provision for the inclusion of swift habitat and swift species recovery int he Plan.

8. A very wide range of swift nesting bricks and next boxes are now available commercially and including the right number in a development is minimal in cost and effort when planned in at the construction stage.

9. As one of the acute Species of Concervation Concern, strategies to help the recovery of London's swift population should specifically be included in the new London Plan. Swifts should be included alongside bats, sparrows and other species. i note that

10. Councils have a legal obligation under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 to protect and enhance all biodiversity. If no nest provision is made for swifts in the new London Plan, the GLA and the Mayor of London will be failing in their duty under the Act.

User: Mr Steven Robinson

Re - Policy G5 Urban greening and Policy G6 Biodiversity and access to nature (Chapter 8 Green infrastructure and natural environment)

I am writing to comment on the draft London Plan. I strongly support urban greening and would like to see more more green roofs/walls and trees in London, particularly street trees to benefit wildlife and the people that live in the city. I would also like to see requirements for new builds over a particular size to have to include internal nest spaces for species like swifts, house sparrows and bats, as the two bird species for example have experienced significant declines, partly due to the loss of nest sites when buildings are refurbished. A lot of London councils already have their own sustainable development policies, but there needs to be more implementation in terms of requiring developments to install things like swift nest places or green roofs. In short, I feel that there needs to be a shift in culture where urban greening/biodiversity is no longer the exception, but becomes more widespread in planning and hopefully the London Plan can help to achieve this.

User: eCountability Ltd

Policy G6 Biodiversity and access to nature We believe that this policy should be strengthened to ensure full compliance with the National Planning Policy Framework and to implement the government's 25-year Environment Plan, published in January 2018.

In particular:

Policy B 4) should be extended to include commitments to ensuring no net loss, or net gain where appropriate, of priority habitats and species.

A new policy B 6 should be added to require developers, in respect of major housing and infrastructure developments and other developments in areas near protected sites, priority habitats or priority species, to access the best available evidence base on biodiversity, to allow an informed decision to be made on whether to grant planning permission.

Work commissioned by the GLA in 2016 found that up to 18% of planning applications in Greater London could have an adverse effect on biodiversity, while only 1% made use of a data search from the capital's environmental records centre, Greenspace Information for Greater London. A recommendation of this report was that planning authorities should publish online maps of areas close to protected sites, priority habitats and priority species, within which access to biodiversity evidence would need to be demonstrated by the applicant for minor housing and infrastructure developments.

It is important that this policy is extended to these selected "Minor" (in the sense of planning application type coding) applications, as the cumulative effect of these applications may far exceed the impacts of "Major" developments. For example, in the London Boroughs of Ealing, Southwark and Camden, the number of "Minor" housing applications exceeded "Major" applications in 2014 by a ratio of around 25 to 1, while the area covered by these respective application types in the Borough of Ealing was around 19 to 1.

The current draft policy, which is essentially a continuation of the current London Plan biodiversity policy, has not proved adequate to protect and conserve biodiversity, does not align with the National Planning Policy Framework or the government's 25-year Environment Plan. The recommendations outlined here will align with these national frameworks and plans and be significantly more likely to deliver the Mayor's commitment to environmental protection than the current draft wording. This is especially important within the context of Policy GG4, which requires that more homes are delivered; this policy will accelerate the rate of housing construction and increase the risks of environmentally damaging development in the absence of a more targeted and spatially resolved biodiversity policy.

User: Kent County Council

The draft London Plan should require green infrastructure strategies created by London Boroughs to include consideration of cross boundary connectivity.

Part D of Policy G6 should state that biodiversity enhancement must be considered from the start of the development process as opposed to the current drafted wording of, “should be considered” (Policy G1 Part B) which creates unnecessary ambiguity.

KCC recommends that Policy G6 Part C needs to be expanded to clearly set out how the impact on the designated sites needs to be considered, depending whether it is of European / International / National / Local importance.

The County Council would also highlight that the Wildlife Trusts have recently published Guidelines on Planning for Homes and Wildlife which set out how new housing developments can be built in a way that helps to reverse wildlife and habitat decline3. This document should be considered in the relation to this chapter in the draft London Plan.

User:	Kent County Council

Add new D 1) and 2)

D 1) Address prevailing fragmentation of natural habitats through linked green spaces, linked street tree planting pits and ensuring gaps under fences and other boundary treatments.

2)Incorporate integral nesting and roosting niches into new development, such as swift, batand sparrow bricks.

User:	Romford Civic Society

Policy G6. Biodiversity and access to nature. I support this policy. I recommend that Sites of Metropolitan Importance and all ancient woodlands are added to the categories of planning applications that must be referred to the Mayor.

User: Wimbledon East Hillside Residents' Association

Also there is a suggestion that 'a wide variety of wildlife habitats' is important (8.6.2). Again, this needs to be made much more clear: Wildlife Habitat is essential and we don't need poorly trained Council staff determining if an existing habitat is part of their ideal 'wide variety' or not. Each and every time a back garden is cleared and a concrete pad is poured, we sacrifice biodiversity in London forever. You need to charge a hefty 'wildlife tax' for the loss of this precious wild space, and donate it to The Tree Council, the Woodland Trust or the Forestry Commission, to ensure that funds and people are able to replenish London's biodiversity if not in London, elsewhere. (It is unsettling that at the same time you are proposing these things, the Mayor is sending out tweets and messages urging people to 'pave over every speck of land' in London for new bedrooms ....)

User: Highams Park Planning Group

POLICY SUS2: Protecting and Improving Biodiversity and Nature Conservation:

All development shall:

i. Provide site vegetation with a leaf area of at least three times the site area using the assessment method in Annex 2 - Appendix 1.
ii. Provide green landscaping of a mix of species with 25% specifically appropriate to accommodate potential future warming of 2°C.
iii. Identify wildlife habitats within and in areas immediately adjacent to the development site and, where practical, provide green landscaping as a continuation with these areas, linking as green corridors across the site and taking account of the type of habitat best suited for such a continuation.
iv. Avoid a design that will have a detrimental effect on wildlife habitats by robust assessment of local biodiversity, pollution and other significant environmental factors.
v. Provide largely green landscaping in the public realm where the development alters or adds to the public realm in its vicinity.
vi. Include bird and bat boxes, green roofs, green walls and other green infrastructure such as active green spaces and/or pocket parks in the development design.
vii. Only fell trees during the process of development if absolutely necessary. For each tree felled a replacement likely to achieve equivalent size and or maturity within two years should always be planted as near to the original site as possible.

User:	Mrs P Matthews

I support. **I recommend** that sites of metropolitan importance and ancient woodlands are added to the categorise of planning applications that must be referred to the Mayor.

User:	Hill and Trustees of the Gwyneth Cowing Will Trust

Hill are developing proposals for the redevelopment of the site in consultation with Barnet Council and the local community that have the potential to provide new homes including a substantial proportion of affordable homes, a new community facility and a new publicly accessible parkland. The proposals will provide green infrastructure that is planned, designed and managed in an integrated way to provide multiple social and environmental benefits to the surrounding community, including benefits to health and well-being, improved permeability, enhanced biodiversity and opportunities for play and recreation. The landscape-led redevelopment of the Whalebones site would result in positive gains for biodiversity in accordance with Policy G6 *Biodiversity and access to nature* of the Draft London Plan. Redevelopment would prioritise the retention of existing high quality trees, and where removal is necessary, adequate replacement tree planting will be provided in accordance with Policy G7 *Trees and woodlands.*

User:	London Borough of Camden

Criterion C (2) - “minimise the spatial impact and mitigate it by improving the quality or management of the rest of the site”: this is potentially too permissive. Many SINCs (for example in Camden) are small and vulnerable to quite minor changes. Once land has been developed, the opportunity for it to be restored and contribute to biodiversity gains is lost forever. As worded, this criterion could be interpreted as supportive of partial development of SINCs, which we do not support. The extent of deficiencies in access to nature conservation in inner London boroughs such as Camden means that the value of even the smallest sites becomes significant.

User:	Abigail Woodman

Any reference to methods to mitigate against harm to a SINC should be removed. The new London Plan must not water down its commitment to protecting SINCs.

User:	Abigail Woodman

The new London Plan should also make a stronger commitment to protecting the natural environment from light and air pollution, as both have significant impacts on biodiversity and human health.

User:	Mrs Alona Sheridan

Policy G6: The approach to biodiversity and access to nature outlined in Policy G6 needs to be strengthened to avoid the loss of valuable habitats and wildlife.

Suggested change: Policy G6 – The second sentence in sub-section A of this policy should be deleted, along with the whole of sub-section C. The following sentence should be added at the start of sub-section D **'All new development should seek to achieve a net gain in biodiversity.**'

User:	Blanche Cameron

The approach to biodiversity and access to nature outlined in Policy G6 needs to be strengthened to avoid the loss of valuable habitats and wildlife. **Proposed change:** Policy G6 – The second sentence in sub-section A of this policy should be deleted, along with the whole of sub-section C. The following sentence should be added at the start of sub-section D **'All new development should seek to achieve a net gain in biodiversity.**'

User:	David Callow

Policy G6. Biodiversity and access to nature. I support this policy. I recommend that Sites of Metropolitan Importance and all ancient woodlands are added to the categories of planning applications that must be referred to the Mayor.

User:	David Tannahill

Policy G6. Biodiversity and access to nature. I support this policy. I recommend that Sites of Metropolitan Importance and all ancient woodlands are added to the categories of planning applications that must be referred to the Mayor.

User:	Elisabeth Rolls

Policy G6. Biodiversity and access to nature. I support this policy. I recommend that Sites of Metropolitan Importance and all ancient woodlands are added to the categories of planning applications that must be referred to the Mayor.

User:	Adrian Malcolm Darley

Policy G6. Biodiversity and access to nature. I support this policy. I recommend that Sites of Metropolitan Importance and all ancient woodlands are added to the categories of planning applications that must be referred to the Mayor.

User:	Agnes Byrne

Policy G6. Biodiversity and access to nature. I support this policy. I recommend that Sites of Metropolitan Importance and all ancient woodlands are added to the categories of planning applications that must be referred to the Mayor.

User:	Alan Jacobs

Policy G6. Biodiversity and access to nature. I support this policy. I recommend that Sites of Metropolitan Importance and all ancient woodlands are added to the categories of planning applications that must be referred to the Mayor.

User:	Alan James North

Policy G6. Biodiversity and access to nature. I support this policy. I recommend that Sites of Metropolitan Importance and all ancient woodlands are added to the categories of planning applications that must be referred to the Mayor.

User:	Joan Anne Hepworth

Sites of Metropilitan Importance and all ancient woodlands shouldl be added to the categories of planning applications that MUST be referred to the Mayor.

User: William Lucy

Policy G6 Biodiversity and access to nature **Suppor**t this policy.

Recommend that **Section B)1** is strengthened as follows (amendments in red): “give the strongest possible protection to ‘veteran’ trees and ancient woodland, especially where these are not already part of the protected site”.

User:	South West London Environment Network

We would like to see policy G6 amended to state that all new development should seek to achieve a net gain for biodiversity.

User: Keith Saunders

The importànce of trees and woodlands cannot be emphasised enough. They improve air quality, provide vital habitat for wildlife, much of which is disappearing from urban areas and aesthetically they help to brea? up views of endless buildings. Also, people feel better and more relaxed in wooded areas. I work as a conservation volunteer and any time spent in woodland makes me feel better in myself.

In the sections listed below (in the same order as they appear in the draft London Plan).

- Paragraph 1.3.3. Recommend an addition (in CAPS) to the following sentence: “Access to green and open spaces, including waterways AND TREES, can improve health, but access varies widely across the city.”
- Paragraph 3.9.5. I support the inclusion of “Protection for trees” as an issue in the amplification of potential negative impacts of large-scale basement development beneath existing buildings.
- Policy H1. Increasing housing supply. I recommend that Sentence B2)d is clarified so that “public sector owned sites” will not include woodland, parks and open spaces.
- Paragraph 4.2.9. I support the principle of “no net loss of overall green cover” as a result of small housing developments, and support “off-site provision such as new street trees” in order to achieve this principle. I recommend an addition (in CAPS) to the following sentence: "Loss of existing biodiversity OR GREEN SPACE, as a result of small housing developments, should be mitigated through measures such as the installation of green roofs, the provision of landscaping that facilitates sustainable urban drainage, or off-site provision such as new street trees in order to achieve the principle of no net loss of overall green cover. Rainwater attenuation features should be incorporated to achieve greenfield run off rates. LOSS OF ANY PUBLIC GREEN SPACE WILL BE COMPENSATED FOR WITH ALTERNATIVE ACCESSIBLE SITES.”
- Policy S4. Play and informal recreation. I support section B2)d, that residential development proposals for schemes that are likely to be used by children and young people should incorporate good-quality, accessible play provision for all ages, of at least 10 square metres per child that: “incorporates trees and/or other forms of greenery”.
- Policy G1. Green infrastructure. I support this policy, and subsequent narrative that mentions the important role of trees.
- Policy G5. Urban greening. I support this policy, including the recommended Urban Green Space Factor, and subsequent narrative that mentions the important role of trees. I support the inclusion of the role and weighting for woodland and trees in Table 8.2 - Urban Greening Factors. I recommend including a reference to Residential Development and Trees (Woodland Trust, 2015, woodlandtrust.org.uk/residentialdevelopments).
- Policy G6. Biodiversity and access to nature. I support this policy. I recommend that Sites of Metropolitan Importance and all ancient woodlands are added to the categories of planning applications that must be referred to the Mayor.
- Policy G7. Trees and woodlands. I support this policy. I recommend that Section B)1 is strengthened as follows (amendments in CAPS): “GIVE THE STRONGEST POSSIBLE protectION TO ‘veteran’ trees and ancient woodland, ESPECIALLY where these are not already part of a protected site”. I support the subsequent narrative on the role of trees, particularly paragraphs 8.71 – 8.73. I recommend referring London boroughs to guidance on ancient woodland and veteran trees: Planners’ manual for ancient woodland and veteran trees(Woodland Trust, 2017, woodlandtrust.org.uk/plannersmanual).

Please accept this my formal response to the consultation. I will look forward to hearing from you as the Plan progresss.

Policy G7 Trees and woodlands

User:	Joanne Smallman

Please keep trees at the heart of London, we are a grey hot blob without them. They are so so important for so many reasons and I fully support the requests of the Woodland Trust on this matter.

User:	John Avery
Please don't forget that although only takes a minute to cut down a tree it takes decades to grow one. Think before you act. We don't want London to follow the Sheffield Council/Amey debacle.	

User: John Bevan

One of the great things about London is it's green spaces; these set it apart from the majority of the cities across the world. However we could do more. By making plans to include trees in any new developments, and to protect those trees which exist today, we get the following key benefits: - A nicer place to live; trees make cities less stressful / more relaxing places; trees have been proven to have positive impacts on mental health - A cleaner place to live; trees help to filter pollutants and improve air quality - Risk reduction; by including trees in planning you can have them soak up groundwater reducing the risk of both flooding and sinkholes; reducing both risk and costly maintenance - Reduce the temperature (i.e. when compared to black tarmac), which can be environmentally beneficial when applied on a large scale - Increases food for bees; helping to reverse the decline of UK bee populations - Consume CO2, thus having a significant benefit on reducing climate change i.e. With a little planning and small amount of spending this could save money for the city whilst improving both the city itself and the environment at large.

User:	John Reginald Fuller

I am a passionate supporter for having more trees in London to both beautify the landscape but also help with pollution. I am also a supporter of you as Mayor and think you are doing a great job to improve our air quality and environment so please keep up the good work

User:	Josephine Smith

We need trees for our mental and physical health. For the conservation of birds, insects and therefore pollination. We need trees for drainage in a time when we are concreting over driveways and increasing building throuout our London. Instead of cutting them down, as so often happens, prune them! Trees are needed if we are to keep clean air. If we REALLY care for the welfare of our beautiful blue planet Mr Khan then let’s stop talking about it and do our bit forLondon. Quality of life is as important as housing.

User:	Judith Wilks

I care about London's trees and woods and the vital role they play in keeping the city healthy. I hope to see increased protection for them in the London Plan.

User:	Judy Rawlinson

I was born in London during the war, when the plane trees on my street did much to alleviate the drabness of life, as did walks in parks and on Hampstead Heath. Please encourage tree planting to continue, especially when so much of the city is being concreted for development and car parking. As a former planner, I feel strongly about this issue.

User:	Julia Warburton

London is the welcoming, attractive place it is largely due to the huge number of wonderful parks and street trees we have. It is vital that we maintain the existing trees, while seeking to replant and improve where trees have come to the end of their lives. Trees are the lungs of our city and help us provide a healthy environment for both our human and insect population.

User: Julie Norwood

I don't live in London now but I was born, grew up there and have always worked there. Trees are massively important, not only for the oxygen they release but for their part in wildlife and the preservation of other species. They help reduce noice, provide shelter and are good for the mental health of everyone. They provide essential homes for birds. Trees are being destroyed without thought when new builds go up, they are felled with indifference to the place they hold in the circle of life and are never replaced thus removing the birds and wonderful canopies. Railways are destroying tree habitat. Special protection must be given to old trees as they are just as important as old buildings and are treasures to be loved for centuries. Leave a good legacy, plant trees and thus bring good fortune to our country in so many ways.

User:	Karen Williams

Trees add beauty, calmness, fresh air to a city. They benefit birds and other wildlife. They make a grey, built-up landscape bearable for people, and make children growing up in a city aware of the importance of nature. A beautiful city like London is made far better by trees. I agree with all the statements below.

User: Kate Prendergast

Trees, all sorts of green, but especially trees, are needed in any thinking about the future of London. We are quite a green city and we should not lose that. As well as beautifying and lifting the mood on the streets they clean the air and remind city dwellers they are part of the cycle of the seasons and of the natural world. Something which now, more than ever we need to remember Many of the students I have taught from around the world have remarked on how green a city London is, with its parks, cherry and plane trees. The trees help confirm London's identity and make it an attractive city to stay in, so drawing tourists and confirming London's status as a first class city. Please don't forget the trees, they should be there, in the planning from the start.

User:	Katherine Balston

Trees and greenery are key to London being one of the finest cities in the world. London without its great plane trees would be an unimaginably poorer place. the London Plan must explicitly provide for the succession and continuity of London's great trees.

User:	Katherine Louise Hollis

With the pollution in our city becoming an increasing problem we should protect the trees which provide the lungs for our city and plant more - the Victorians knew what they were doing when they planted them! Furthermore, as we look forward to London becoming a National Park City next year we should embrace our street trees in addition to the green areas and waterways in London - they form an important part of the network for London's wildlife apart from being a valuable asset to London's street scenes.

User:	Katherine Lee

I wish to make a claim for our wonderful trees and green spaces to be protected. They are what makes our city so beautiful, so cheerful, so good for children and different from other great international cities. They are beneficial to all and must be included in any overall plan for our great city.

User:	Kathleen Dumville
Please would you consider the huge benefit that trees bring to urban environments both for people and animals.	

User: Keith C Marshall

I will support any, and every, plan to increase the number of trees in London. Green spaces are important, but so are trees in the streets. Many species help in reducing pollution, including the reduction of particulates. Trees also provide mental health benefits and are a key aspect of green, open spaces. They also help control rainwater run-off and are a vital element in caring for our wildlife and species diversity. Every tree needs to be protected: from root damage by utility works and basement development; and from lopping/pruning by over-zealous local authorities. Not only must there be no net loss of trees, but we should be doing everything we can to increase the number of trees. Private individuals and organisations should also be encouraged to plant/maintain trees - to do this it should be made illegal to fell any tree, anywhere, with a trunk diameter of over 20cm and all wooded areas of more than (say) 100 sq meters. Every Londoner should have a green open space with trees/woodland within a 5 minute walk.

User:	Ken Williams

I believe we need to amend development processes so that a more balanced decision can be reached which reflects the value - in its wider sense - of trees to London. They are not just lumps of rooted wood to be got rid of if they're in the way, and their value needs to be recognised more fully.

User:	Kim Harris

We need more trees, trees that blossom and fruit as well as the usual urban trees. Streets planted with specific trees would be interesting. A city without green spaces and trees is a dead city.

User:	Kirsteen Ross

I am lucky to have found a home next to one London’s major parks, Crystal Palace. I chose to live here because of my worsening asthma. Living next to parkland means that I breathe cleaner air with fewer traffic pollutants than my previous home which was next to a section of the South Circular. The trees of the park are an important pollutant reducing force for me. Across London they beautify our streets and contribute to a healthier city. We need more tree lined streets and areas free from the fumes of combustion engines. This is as big an issue as the smoke controls brought in to elimate the deadly ‘smogs’ which formerly were responsible for shortening so many lives.

User: Laura Carlisle-Goldthorpe

I feel that it is a misconception that cities need to be densely developed with concrete structures in order for the economy to prosper. As one of the largest cities in the world London needs to maintain and preserve it's trees, green space and woodland. Cities exist because of people and it's therefore important that the physical, mental and economic wealth of those people is nurtured. Your own research is establishing how trees contribute to the well-being of people in terms of health and economics. So as well as being integral to the biodiversity of nature, trees are part of the biodiversity of a city. In such a large city with a growing population it's especially important to protect London's trees and wood from development.

User:	Laura Gatdula

My family and I gain benefits from the trees in our area in terms of health, wellbeing and education as we walk through a wooded area every day on our way to school. We notice the wildlife, discuss seasonal changes, and breath cleaner air because of the trees. More Londoners can benefit in these ways if trees are protected in the London Plan. Please ensure that this is the case for our current population and future generations.

User:	Lesley Stevas

All trees are of importance especially here in London. Everywhere is becoming over developed. Careless building contractors often regard trees as a hindrance and either fell them or damage the roots in their work. Some have the attitude of ‘chop it down, we can always grow another’ The reality is that some of London’s trees were planted by the Victorians taking decades to reach maturity. These must be valued. Many householders cement over their gardens in order to provide free parking spaces for their cars. This policy needs to change. We need as much green space as possible to allow rainwater to drain and stop flooding.

User:	Lindsey Jones
I'm standing up for trees in London and across the country.	

User:	Lindsey Scott
Trees are very important to me, they provide calm in an otherwise anxiety inducing world, as well as a cleanser for our polluted air. They should be an essential part of planning.	

User:	Lorraine Wileman
Simply to say that the protection and enhancement of London's trees is essential.	

User:	Louise Ray

As a long time Londoner, I have experienced the value of living in areas with big trees along the streets. Where I am now has fewer tree lined streets and it’s a more depressing environment as a result. Trees shouldn’t be only for the rich. We all need the mental health and physical health benefits of greening our streets and safe guarding green space. Places to get in touch with our emotions and work through the hard things of life.

User:	Lucy Caithness

The benefits of trees are such that without them comes physical, spiritual and actual desolation. To protect trees and increase the mass of them can only be beneficial to every form of life but particularly city dwellers who are bombarded with new builds of hard and non beneficial surfaces to block the valuable space and contribute increasingly benefits only for those who can afford to escape the city. London is prized for it's trees. The Dutch elm disease was a huge loss which could not be avoided. It is vital we don't destroy trees, and vital we replace and expand the tree community.

User:	Luke Ives

Please take this opportunity to ensure that trees are a part of all development plans in London. Make London (my home) the greenest city - it can be. Fall the talk of London being a great place - the reality is most of it an inhospitable ugly concrete jungle. Trees really do make people happier and happy Londoners on the cheap has to be a win right?

User: Lynn Zaidman

Trees are literally our breath of fresh air for all. They don't discriminate, they simply give out our oxygen for everyone's benefit and help remove the CO2 emissions that we put into our air. So it is our duty to protect what we have and to increase the planting of new trees, forests, copses etc. They are important to peoples' wellbeing, you feel energized when you walk among the trees, see them with your own eyes. Their fruits benefit both animals and humans. Everyone in our country needs to be part of this very important project, from businesses, schools, hospitals, local communities, we can all do our part together with you. Thank you as always for your time and consideration in these matters.

User:	Margaret J Cheal
Trees are the lungs of London,we need them for our health and wellbeing.	

User:	Margaret Patricia Thomas
More trees please	

User:	Marjorie Woods

We are all becoming more and more aware of the value in trees in the city landscape. Firstly to absorb the C02 from vehicle exhausts, and secondly the parks where people can connect with the calming influence of Trees, grass and plants. This is particularly important for city dwellers who need the chance to walk, exercise, relax and BREATHE in the good oxygenated air. Please stop removing Trees from streets and thoroughfares as they are essential to improving city dwellers health, and we need to give our future generation a better chance of growing up healthy and not poisoned by carbon emissions. Politicians .... please ensure this happens going forward.. no excuses.

User:	Mark Wildman

The value of trees is beyond measure. Not only are the unequalled in lifespan and aesthetics they are vital for people's health and well being. They are fantastic air cleaners and habitats for wildlife that enrich communities. Everything but everything must be done to protect trees and we must not allow lazy thinking, short term lazy economics or ignorance to allow their destruction.

User:	Martin Caiger-Smith

I feel passionately that a long-term plan such as the London Plan needs specifically and definitively to include the protection of existing trees and green spaces, and the provision of more tree cover in development plans. The benefits are self-evident; the threats to existing trees are many. This has to be a priority, and a vital and indivisible element in the Plan as a whole and your admirable environmental and air pollution initiatives in general. I support wholeheartedly the specific and detailed points made by the Woodland Trust, of which I am a member

User:	Martin King

I live in Beckenham next to Beckenham Place Park where Lewisham council are currently destroying woodland for the sake of a vanity project. We need more trees. Not less.

User: Martyn Grundon

Trees make a significant contribution to my sense of well being. In London this becomes most apparent as one moves quickly from a tree rich street to one devoid of trees. As well as this emotional effect trees make an important contribution to our actual physical health. Also we must remember that we share this terrain with other creatures who depend on trees.

With the now rapidly accelerating rate of development I fear trees are at risk and implore you to take them into consideration.

User:	Mary Robinson

Trees and woodland are vital to London because they enhance the environment and contribute to the physical and mental health of residents. I feel very strongly that there should be access to open space for all but particularly for children.

User:	Matthew Gascoigne
Trees are the difference between a pleasant place to live and a scene from Bladerunner	

User:	Matthew Henderson

I support the amendments below. We live opposite a park and with ancient woodland behind us. These tress and associated green spaces make living in London enjoyable and worth staying for. Our children have always loved going to the park and, since they are 9 and 11 years old, will continue to play in them for a long time to come.

User:	Maya Yamashita-Barr

Trees and woodland are an invaluable part of the natural world which is getting lost due to the ever expanding capital city that is London. They are a key resource for relaxation, enjoyment, learning, and the grounding and understanding that we need of the environment and of course extremely important in the fight against climate change. We should increase the amount of woodland and trees that we have as much as possible and maintain and protect the woodland that currently exists without negotiation, especially considering the years of maturity that they take to be even vaguely established.

User:	Melissa Jorgensen

We need trees in order to survive, they provide oxygen for our planet and clean the air that we breathe. There is no value you can put on the role that trees play in our lives and ecosystems. London is already extremely polluted, lets do our best to turn this around by not only protecting the trees that currently exist in our capital but also making sure that new ones are planted and that this city becomes as green as possible.

User:	Michael Saich

Trees and woodland are hugely important for our local area. They turn what would be a dreary footpath or common into something a bit more special. It's a worry that development will harm our local green spaces and woodland, when we value it so much. We recognise there is a need for housing, good transport, and a strong economy. But there's no point having all that if we all end up living in areas that are grey and lifeless. It won't do the people who live their any good either.

User:	Michael Towsey

I strongly support the views of the Woodland Trust on this issue. Trees are a vital part of the ecosystem of an area and particularly vital in a big city like London to balance out the bricks and mortar of the built environment as well as being important for human well being. All plans for development should not only aim not to reduce tree coverage in the city but if possible to increase it.

User:	Mrs. Michele Harvey

Trees are the most important part of London. They make the city liveable. Please include provision to increase the number of trees, particularly along the pavements.

User:	Michelle Sidney

We need as many trees as possible - not just sparse areas, but well-maintained habitat areas too. Ensure mature trees are protected with TPOs and include shrubs and trees as mandatory in all new property developments.

User:	Mick Mannion

I would like to see many more trees in London and to see those that we do have preserved wherever practical. Trees offer so much to our lives in London for so little cost or other negative consideration. Also trees are very much part of the character of London and what visitors to our fine city see when they visit

User: Mike Baker

Trees and woodlands are essential to our physical and emotional healt and wellbeing, so I welcome the recognition of their importance in the draft London Plan. The London Maoyor and over half London's ward teams have now pledged their support for making London the world's first National Park City, so a plan that promotes the preservation and enhancement of London's open spaces and wooded areas, as well as looking after existing and planting more street trees is an essential part of this. I also support the amendments proposed by The Woodland Trust below.

User:	Mira Naftaly

Trees make urban environment pleasanter to live in and greatly improve quality of life. For many years now London has been losing its trees. This must be stopped and reversed. More effort should be given to tree preservation and tree planting in London.

User:	Miri Stickland

There is clear value in London's trees and woodland, both in terms of their ecological value as well as their impact on the environment in which we live. You only have to visit London's parks and green spaces to see what a positive impact they have on London's residents, especially children . The London Plan should seek to protect our trees and woodlands and preserve them for future generations.

User:	Molly Moon Carr

I work from home, I walk round the block to gain clearance and reach understanding of my surroundings. The worst thing i can possibly imagine would be that one day i'm on my walk and i cant hear the waving leaves being moved by the wind or the crunch of the fallen, i cant smell the seasons change. I cant image a different place from the one that i am in. That would happen if there were no longer any trees. Urban areas need something that's constantly living and growing. We need nature because we are natural. The green opens our breath and allows us to see the world for what it is. A living organism. Please protect the progression of the humans race by supporting the need for trees.

User:	Monika Mitchell

We have only one life and trees are as important to us as all living creatures. Therefore please don't take down a healthy tree. Plant new trees and educate others to do the same.

User:	Neil Anderson

One of Londons great attractions has always been its stunning trees that help green up a truly fantastic city. This is an ongoing project to ensure that these trees are looked after properly and many new ones are planted so that future generations will thank us for our foresight. It is just SO important to plan ahead to ensure that green spaces are protected and trees continue to flourish.

User:	Neil Delaney
Trees are great for extracting CO2 from the atmosphere. They tackle client change and look pretty. Everyone is a winner. More trees please!	

User:	Neville Carney

Trees are extremely important to help with air pollution within the city. It is time for money to stop dictating the future of London for the benefit of property development at the expense of the health and well being of the present and future inhabitants of the city.

User:	Nicholas Robin Armes

Trees in London provide health benefits, both physical and mental, to the Residents, workers and visitors to London. They provide habitat for bird and wildlife enhancing the living environment. Priority should be given to retaining and enhancing existing wooded,open and parkland areas, as well as adding a minimum provision of semi mature broadleaf trees to any housing and highway development/improvement.

User: Nick Sandford

I do not live in London but, like millions of other British people, I visit central London in particular on a number of occasions each year. Whilst there are well treed areas in some parts of London, other parts and in particular some of the most popular areas seen by visitors have very few trees. I think it is important that existing trees and woods in London are given strong protection and, wherever possible, more trees and small areas of woodland are planted, with an aim of increasing the tree canopy cover. This is particularly important in areas where there is new development. Trees provide a massive range of benefits to people and to wildlife and in urban areas they are particularly important for improving air quality, reducing summer temperatures and preventing surface water flooding. I would like to see the following detailed changes to the draft plan....

User:	Nicole Burdett

I feel that trees are extremely valuable to London life not just for their ability to help clean the air, but also to provide an escape from working life, for a distraction of peace among the hustle and bustle of life in London, they provide a means of play and joy for young children growing up bored in an urban setting and are vital for costume props, where else would I have found gandalf’s staff for free if it weren’t for the treee that had shed a branch? So please, please bear all this in mind and include trees and green spaces in London the new London plan.

User:	Niki Lavithis
Trees are very important for our mental health, but also to help with the air quality in London.	

User:	Patrice Bendon

Trees are so very important for our mental wellbeing. A landscape without trees is barren and desolate. Ensure our green space is protected and integrated into planning.

User:	Patsy Howe
I support maintaining existing trees and planting more trees wherever possible, especially in brand new developments.	

User: Paul Dyson

As part of your London Tree Plan I would like you to ensure that all developers replant the same caliber trees that they move on sites (not a twig for a tree) I would like a complete greening of SE1 to ensure bio diversity and homes for wildlife amongst the glass boxes which were allowed by your predecessor. There needs to be green flight paths for birds . The 2 metre path width reduced in residential areas to allow more smaller and diversely interesting trees to be planted. We need a complete greening of our city and plats be the priority rather than concrete . I hope very much that you can include my wishes in your plan . I have been a resident in London for 40 years and all I have seen is the lessening of greenness which in turn has impoverished my health and standard of living . I fully support the Woodland Trust's amendments

User:	Paul Hughes

London's street and community trees and it's woodlands, including Ancient woodlands, are an essential part of the city and have so many benefits for it's residents, visitors and it's wildlife. Please fully protect those already planted and let's start planting millions more.

User:	Paul Kennedy
Trees are an essential part of our sense of wellbeing within the urban environment.	

User:	Paul Salt

Trees and woodland are a very valuable asset for London and elsewhere. They need protection from development, and from cost-cutting measures, in order to improve the environment for us all.

User:	Pauline Jean Symons

I believe that London is unique as a capital city because there is a high proportion of green spaces. These need to be nurtured and extended with more trees planted especially in view of the standard of air quality being so bad at the moment. It is well documented that trees help to remove pollution from the atmosphere and reduce the effects of pollution. It would be madness to ignore the need for trees in our capital. We need to preserve the trees we have and plant more for future generations. It is also important that our children have access to nature and do not end up living in a concrete jungle.

User:	Penelope Russell-Ross

I heartily agree with all the additions (IN CAPS) that the Woodland trust has made in the Plans listed below. Trees are vital to our health and wellbeing in London, especially where there is lots of traffic. All urban spaces should have trees included and as housing increases we need to see more trees not less.

User:	Peter Hope

I personally find trees and woodland to be very beneficial to my state of mind. With London becoming ever more crowded and urbanised, trees are becoming ever more precious connections to the natural world. I believe the value of trees within London needs more formal recognition and I encourage you to reflect this in the London Plan.

User:	Peter John Smith

Trees are a basic essential to the health, mental and physical, of the residents of any urban space. This operates on very many levels from the contribution to clean air, to the support of fauna and insect life, to the maintenance of an attractig and the need to supply more housingve environment for example. Unnfortunately it is too easy to loose sight of the need to pro-actively support trees in the city and bend to the dictates of funding and the need to house more people - easy but mistaken, a path which produces an deleterious living space.

User: Peter Lewis

I understand the pressure to provide more affordable homes in London but I do not support development which results in the loss of valuable trees and woodland. Developers can promise to replace trees but these take years to mature and in the meantime wildlife may not be able to find new habitats to bridge the gap. London has a great inheritance but this cannot be taken for granted. There are other ways to influence the housing market such as allowing local authorities to levy much higher property charges on the most valuable homes, especially those which are left empty. With reference to the Plan, I support policies to protect trees and woodland as at paragraph 4.2.9, subject to any off-site provision being as close as possible to allow continuity for wildlife habitat, S4, G1, and G5-7.

User: Peter Stanley Rose

I have lived on the edge of Epping Forest for over 30 years and this has instilled in me a deep appreciation of the value of woodland for both mental and physical well-being to an otherwise urban existence. With so much of central and suburban London being rapidly turned into a bleak and soulless concrete canyon of tower blocks and ugly developments, I believe it is essential that all remaining trees in the city should be protected and more planted. Without trees, birds and insects disappear and even more CO2 is released into the upper atmosphere. Please promote and protect trees wherever you can and stand up to developers who don't care about anything beyond a quick profit.

User:	Philippa Gwendolen Justine Collins

Trees are the lungs of London. They are make the city come alive. The awesome size and energy of the city is softened by the solace of nature. We need them!

User:	Philippa Peate

Trees are so important and especially in London as they are beautiful and help people’s mental health and happiness - watching the changes of the seasons and the leaves swaying in the wind .. Trees also absorb heat and pollution and are vital .. Birds can live in them and then we can enjoy the sound of bird song .. so so important and they soften the harsh concrete and other buildings .. Please look after our trees and plant lots more wherever possible along urban streets and walkways .. Open green spaces are absolutely vital too!!

User:	Rebecca Lovell

Our trees are part of our heritage and should be treasured as much as our historical buildings. Ancient woodland needs to be protrcted and saved!

User: Rebecca Watret

Please listen to the Woodland Trust and take into extreme consideration the importance of trees in our Capital city. Obviously not only are they a unique and cost affective resource to help combat air pollution but they are also very much underestimated in peoples well being and frame of mind. To live in a city made up mostly from concrete is not good for any human being. Its not natural and should never happen. People need nature around them to function and many people don't even realise this. If you want to talk financially, a leafy London creates a more attractive prospect for investors - everything is a knock on affect and as crazy as it sounds It really does all start with nature and trees. Less trees, more pollution, more angry people, unattractive city to live in. For proof, just go to any London Park at the weekend and see the number of people there - especially on a summers day. We need to keep a significant number of Trees in London and green spaces to make it a healthier and more attractive place to visit and live. Look at Singapore as an example and how they are renowned for their efforts to create a greener city - it's even been turned in to a tourist attraction. Please don't create a city where we live on top of each other any more then what we already do, with no trees and a rise in mental health issues.

User:	Richard Holmes
Trees are vital part of our Community	

User:	Rita Curran

I don’t swear to be am expert on trees however I can speak for their beauty and health benefits to the environment and to people. As humans we forget to appreciate the amazing benefits we have from trees, keeping our air cleaner and thus our water quality, and to simply stop and gaze at trees whether in the park, woods or our local streets. They are a haven for our wildlife which is already very vulnerable with green areas being more and more reduced and some farming methods which are killing off our insects and bees. Please keep up the good work of giving our trees priority and value, we need them more than they need us.

User:	Robert Swanton

We are increasingly concerned by the loss of habitat through the removal of trees by developers and service companies. Over 600 species rely on Oak trees, we nearly lost a local one through the carelessness of a work man and digger. We have another in garden behind us that we fear for from developers. You must support both the protection of existing tress and the planting of new ones - Native species at that.

User: Roger Stuart Reynolds

I think it is very important that the value of trees to the environment is taken into account in all areas of planning and development. If any trees have to be removed as part of an agreed development then an equal number of reasonably mature trees should be added elsewhere in any scheme. Trees should be planted in streets, wherever possible. Parkland trees should always be protected. Plans should be put in place to preserve mature trees in people's gardens, wherever possible. Councils in London should produce a list of protected trees and take action to add all mature trees to those already listed.

User: Rosanna Zabeth

TREES are an invaluable part of green & open spaces. Access to green spaces,for health & wellbeing citywide should be emphasised. I support the protection for trees in all decisions pertaining to potential negative impact of development in the city. Please clarify that Public Sector owned sites eligible for development should not include woodland, parks & open spaces. Any loss of such space should be compensated for with alternative accessible sites. I ask you to support the principle of no net loss of overall green cover. Creative measures - green rooves, new street trees, whatever can be put in place. Trees & other forms of greenery should be routinely, but thoughtfully, incorporated into play area for children. I support that sites of Metropolitan Importance, & all ancient woodlands, be added to the category of planning applications that must be referred to the Mayor. I recommend that Boroughs be directed to The Planner's Manual for Ancient Woodland & Veteran Trees (Woodland Trust 2017; woodlandtrust.org.uk/plannersmanual Please accept this as my formal response to the consultation. I look forward to hearing how the plan progresses. Please be the responsible voice that our TREES & GREENSCAPES need now & that the citydwellers of the future require of us.

User: Rosemary Norton

Trees and green spaces are a vital resource for all people - and all the more so for those of us who live and work in densely developed urban areas. They offer respite from the de-humanising mono culture of commercial developments in the City of London and the suburbs. Respite in the form of shade, places to sit and rest and reflect away from the air conditioned, sealed environment that many of us spend most of our working lives in. It is so important for our health and wellbeing to be able to step out of that pseudo environment and have contact with nature. Trees offer habitat for many other species of birds animals and insects and that diversity in a city scape gives people who live and work there a sense of connectedness and hope. In a time when so many species are declining rapidly due to human intervention, it's vital that we include viable green spaces and trees in our urban areas that offer genuine habitat for other species and that we do not allow our cities to descend into urban deserts where nothing else can live.

User:	Ruth Kosminsky

Were I live in Walthamstow E17. Trees are being sacrificed to make way for high-rise tower blocks; these tower blocks are selling acomodation at prices that locals can not afford.

User:	S Avery

Trees in London keep us sane and keeps the air breathable. They need to be better protected and looked after. We need more trees in every street. The dawn chorus is slowly disappearing as green spaces are eroded. Trees are very important to us and other living creatures.

User:	Shannon Sinclair

Trees aren't just for parks. Lining the streets' pavement, they also provide beauty, clean air and shade. A variety of indigenous trees should be planted in celebration of the country's heritage.

User: Sally Ebrahimi

I am always horrified when I see mature trees/woodlands being destroyed. We must make them a priority when planning around them. We want more trees in nurseries and schools, we want to encourage a love for the outdoors among children and the population in general. Too much emphasis is being placed on housing at the expense of our natural world. In my own area horrendous housing developments have gone up making the local area look awful, crowded, dirty. Too many people being crammed into a small space. We want more not less access to the natural world. These buildings once up will remain a blot on the landscape for years to come, causing those living in the area more stress with all the resulting illness and unhappiness that brings. I want local people to be consulted prior to new developments and for the landscape and natural resources to be given paramount importance. I feel angry. Angry that we are losing our natural environment. Children in particular must feel rooted to and connected to nature in order to protect it. In order to value it. I want our local woodlands protected, I want to see the development of more woodlands and wild spaces.

User:	Sally Gammer

Not only do trees bring improved air quality which is imperative and already the subject of various campaigns but they bring beauty give nature a home. They are more pleasing to the eye than cold hard buildings and give a feeling of life and movement not possible from concrete, metal and stone.

User:	Sarah Bourne

Trees are an integral part of any urban space, they give cover and shade in the summer and look beautiful in winter. They help reduce pollution, especially mature trees which must be protected at all costs. There is a trend to fell mature trees and replace them with small ones which will take years to mature. The wildlife is disrupted and there is little cover or shade. London is being concreted over and little thought is being made as to the benefit of green spaces and wildlife. Mature trees and plants soften the landscape, improve the air quality and are beautiful to look at so there should be less hard landscaping and more greenery everywhere.

User:	Sarah Evans
I live in Islington which has very few parks and nature spaces. Woodlands and trees are very valuable not only as lungs for a city it also for mental health and wellbeing	

User:	Sarah Pakenham
With denser and denser housing and population it’s increasingly important to devote bigger areas to trees to improve air quality and well-being.	

User:	Sheila Blankfield
Please, please consider the trees for beauty and for breathing.	

User: Sheila Fox

I voted for you - and encouraged everybody I know to do the same. I did so because you are a decent man - and I share most of your views on London. I know that you are very concerned about pollution (as you should be). Please, therefore, protect our trees in an active and pro-active way....because they are our natural and powerful defense. We all know that housing is a critical issue for London - and many more homes need to be built. But PLEASE do not rob Peter to pay Paul, as regards this issue. Do not, please, endanger our trees in order to build more...make sure that the much-needed housing does not endanger the powerful protection against pollution that trees provide. Clean air to breathe is the most fundamental right of everybody. Above all, do not let greedy property developers (with whom councils often collude) force your hand. Protect our trees and particularly our ancient woodlands - that is the best legacy you can leave for our children.

User:	Shoshana Foster

Trees are needed to help clean the air we breath by absorbing CO2. They are a calming influence in every bodies stressful lives. We need to protect trees, especially the older ones, against planning developments. Vintage trees should have Protective Orders placed on them. More parks and open spaces with plenty of trees may reduce mental health problems. All new residential areas should have mandatory open spaces with trees. Trees help to stop flooding and mud flows. Flowering trees beautify the environment.

User:	Sophie Service

Polution is an increasing problem for London and the graphs show that this rises significantly during winter when the trees are not absorbing it, so proving their worth. Please, not only plant new, young trees who's capacity to absorb polution is better than our lovely old trees but also plant evergreen trees that will help clean our air all year round.

User:	Stefan Davis
We need more trees in london and more green.People come to visit London will love it.	

User:	Stephen Crowther

I’m am replying as an ex London resident of many years and whose son and granddaughter were born and still live there. Mature trees are know to have an important influence on the mental health and general well being of nearby residents. Of course they are very important to the local ecology as well. London is known for its green spaces,parks and mature trees - I hope that you are committed to continue as so. Please don’t let the short sighted and deeply unpopular views of Sheffield Council have any traction in the capital.

User:	Stuart Payne

Trees are particularly important in cities for so many reasons. On a practical level they provide a haven for wild life and can absorb pollution and carbon dioxide. They can improve the spiritual welbeing of people who live and work in there by providing a connection with the natural world as they change through the seasons, creating a natural space for people to relax in,and improving the look of public spaces and softening what can be a cold harsh environment. Trees take time to mature, so as well as new plantings it is very important to preserve existing woodland and green spaces. As in Paris which I have visited recently London's trees and green spaces are a vital part of the character of the place and as a Londoner I feel very deeply that it is important that this should remain so.

User:	Sue Bell
This plan will lead the way to all urban areas having more trees - with all the benefits that they bring.	

User:	Sue Brown

Washington is a beautiful city but it is kept so by the continual planting of trees. I would like London to follow this initiative. I know first hand how much developers fell healthy trees before putting in planning applications this has to stop! We need better protection and more planting.

User:	Susan Dorrell

I love London's trees and hedges. They have great value for people and wildlife. Please ensure that as new houses are built trees are protected, and spaces are included for hedges, flowering plants and vines such as ivy

User:	Susan Evans
Strong rules to protect current trees and education for all as to the huge value that they bring to health, well being and biodiversity.	

User:	Susan Ring

Trees and woodlands are incredibly important to my family and other Londoners, so please take note of my proposed amends to the London Plan to reflect this. I would also like to point out that I have read about the horrors happening in Sheffield with the local Council there cutting down perfectly health trees to make maintenance of pavements easier - please do not let this happen in London!

User:	Susannah Bell

I live in Bloomsbury - and it's not blooming! Every summer, young trees (saplings) die due to lack of attention and dehydration. Beautiful trees are cut down for no reason. For example, on my street, two GORGEOUS cherry blossom trees were cut down without consultation. They were the ONLY thing beautiful thing about my ugly street. Please plant more trees to save the sanity of Londoners. We do not live in a concrete jungle by choice. Please consider supporting the trees we have and consider planting more. Replacing cherry trees with thin, sad-looking birch trees which offer NO shade and NO ornamentation is not an option.

User:	Suzanne Johnston

Trees and woodland are indispensable to the quality of life, not least for their role in combatting pollution. I live close to the Stag Brewery in Mortlake which is being redeveloped by a company who wish to destroy trees and playing fields (to build a school !) and to widen a road in spite of the fact that the pollution level of nitrogen dioxide is already 50 per cent ABOVE the legal limit.

User:	Terry Hunt
Please lets make London the most tree-friendly city on the planet	

User:	Toby Nicholson

I strongly believe that having sufficient trees, even in dense urban areas, contributes the over all well being of the City. Insufficient action and imagination is directed at increasing the number of trees in London, and this needs to change. The original builders of London's squares left a rich heritage of trees, now in their prime. It is time we did similar for future generations.

User:	Tony Julius

We are learning more and more the value that trees bring to both city and country environments. I support the Woodland Trust’s recommendations and ask you to include the protection and planting of trees as a key feature of the London plan.

User:	Tracey Grove

With the extensive pollution issues currently affecting London I believe it is very important for the health of the population to continue to have as many trees as possible in and around London. It is important for our children to be able to see trees and have access to open spaces and trees and to be able to get out and enjoy the fresh air. Goes a long way to easing depressing and having a healthy lifestyle.

User:	Tracy Gayler
The local boroughs need to maintain the existing trees to keep them healthy and re plant to ensure our air and environment can be improved	

User:	Val Young

The capital should set an example to the world , trees are important to our health and well being . They provide habitat for wildlife and shade from heat . London is a great city but it should be a green city .

User:	Victoria Seymour

Trees and woodlands and park spaces are essential for human health especially as living conditions in London become denser. Please do everything possible to protect, extend and increase numbers of trees and space for woodlands.

User:	William Bodger

I would like the present tree cover to be protected as far as safe and practical. Especially I think that eastablished trees should be protected from harm from new cellar excavations. Trees purify our air, provide shelter and food for all sorts of wildlife, and they add beauty to our enviroment. I feel they are a huge amenity.

User: William Saunders

I travel to London for work every week and we also enjoy visiting London with our children. After using the train to get to London we only use bikes to travel round the city. London’s support of bikes and parks is amazing but you need to do more as the air quality is appalling. Trees could do so much to help with this issue - provinding the lungs for the city and contributing to improving the air quality that threatens the young lungs of my children. Trees will also help offset the effects of global warming. Cities in Africa have long recognised the value of tree shaded spaces to ease and escape oppressive heat. London already gets uncomfortably warm in summers and it’s set to get worse. Unlike glass and concrete trees can help to shade, absorb and hydrate to offset the heat build up. Trees value should be recognised. Existing trees should be protected. Trees should be replaced. Tree planting should be expanded. Trees should be demanded as part of every planning application. London is already one of the greenest cities. We need to value that and then build on it.

User:	Yolanta Gawlik

Please remember that we need the trees and all plants to produce oxygen and fresh air in London. London is polluted enough already. The trees also help with relaxation and encourage outdoor activities. We seat in front of our computers all the time and need outdoor activities for health. Outdoor natural spaces are not a luxury, they are basic need.requirement for health.

User:	Yvonne Sanders

Please promise in the Plan to plant lots more trees in London: 1. to absorb the pollution 2. make the environment generally more pleasant 3. provide habitat, food and shelter for thousands of creatures 4. take steps to stop residents paving over their gardens!

User:	Yvonne Woodley

There are many wonderful trees and green spaces in our capital city. Trees are beneficial to a city’s environment, improving health and happiness. All ages enjoy trees from toddlers to pensioners enjoying the shade and natural environment. Trees provide an important sanctuary for much wildlife, such as birds, squirrels and insects. Trees must not be destroyed and developers must make provision for them in any plans.

User:	William Lucy
Please remember our trees - please adopt all points on the back of the attached letter	

User:	William Lucy

Policy G7 Trees and woodlands **Support** this policy

Support the subsequent narrative on the role of trees, particularly paragraphs 8.71 – 8.73.

Recommend referring London boroughs to guidance on ancient woodland and veteran trees: Planners' manual for ancient woodland and veteran trees (Woodland Trust, 2017. Woodlandtrust.org.uk/plannersmanual).

User:	South West London Environment Network

We would like to see policy G7 strengthened to protect all veteran and mature trees and mature hedgerows.

User: Keith Saunders

The importànce of trees and woodlands cannot be emphasised enough. They improve air quality, provide vital habitat for wildlife, much of which is disappearing from urban areas and aesthetically they help to brea? up views of endless buildings. Also, people feel better and more relaxed in wooded areas. I work as a conservation volunteer and any time spent in woodland makes me feel better in myself.

In the sections listed below (in the same order as they appear in the draft London Plan).

- Paragraph 1.3.3. Recommend an addition (in CAPS) to the following sentence: “Access to green and open spaces, including waterways AND TREES, can improve health, but access varies widely across the city.”
- Paragraph 3.9.5. I support the inclusion of “Protection for trees” as an issue in the amplification of potential negative impacts of large-scale basement development beneath existing buildings.
- Policy H1. Increasing housing supply. I recommend that Sentence B2)d is clarified so that “public sector owned sites” will not include woodland, parks and open spaces.
- Paragraph 4.2.9. I support the principle of “no net loss of overall green cover” as a result of small housing developments, and support “off-site provision such as new street trees” in order to achieve this principle. I recommend an addition (in CAPS) to the following sentence: "Loss of existing biodiversity OR GREEN SPACE, as a result of small housing developments, should be mitigated through measures such as the installation of green roofs, the provision of landscaping that facilitates sustainable urban drainage, or off-site provision such as new street trees in order to achieve the principle of no net loss of overall green cover. Rainwater attenuation features should be incorporated to achieve greenfield run off rates. LOSS OF ANY PUBLIC GREEN SPACE WILL BE COMPENSATED FOR WITH ALTERNATIVE ACCESSIBLE SITES.”
- Policy S4. Play and informal recreation. I support section B2)d, that residential development proposals for schemes that are likely to be used by children and young people should incorporate good-quality, accessible play provision for all ages, of at least 10 square metres per child that: “incorporates trees and/or other forms of greenery”.
- Policy G1. Green infrastructure. I support this policy, and subsequent narrative that mentions the important role of trees.
- Policy G5. Urban greening. I support this policy, including the recommended Urban Green Space Factor, and subsequent narrative that mentions the important role of trees. I support the inclusion of the role and weighting for woodland and trees in Table 8.2 - Urban Greening Factors. I recommend including a reference to Residential Development and Trees (Woodland Trust, 2015, woodlandtrust.org.uk/residentialdevelopments).
- Policy G6. Biodiversity and access to nature. I support this policy. I recommend that Sites of Metropolitan Importance and all ancient woodlands are added to the categories of planning applications that must be referred to the Mayor.
- Policy G7. Trees and woodlands. I support this policy. I recommend that Section B)1 is strengthened as follows (amendments in CAPS): “GIVE THE STRONGEST POSSIBLE protectION TO ‘veteran’ trees and ancient woodland, ESPECIALLY where these are not already part of a protected site”. I support the subsequent narrative on the role of trees, particularly paragraphs 8.71 – 8.73. I recommend referring London boroughs to guidance on ancient woodland and veteran trees: Planners’ manual for ancient woodland and veteran trees(Woodland Trust, 2017, woodlandtrust.org.uk/plannersmanual).

Please accept this my formal response to the consultation. I will look forward to hearing from you as the Plan progresss.

User:	Primrose Hill Conservation Area Advisory Committee
G7 We welcome the protection of ‘veteran’ trees and ‘trees of quality’: we seek more effective protection of mature trees.	

User: Angela Thomas

TREES

Our streets still need more trees especially the wide fast, traffic filled roads that bring us into London. Some are already lined with handsome large trees but many are not or are being planted with ridiculously out of scale small trees that look foolish against our often imposing or heritage buildings lining the routes. We all know the benefits that trees help in providing clean air and without too much complicated technology. Great avenues of trees leading people into our wonderful city is a real sight to behold.

User: The Forestry Commission

Appendix 1: Suggested wording for Policy G7 Trees and woodlands

A Trees and woodlands should be protected and managed, and new trees and woodlands should be planted in appropriate locations - in order to increase the extent of London's urban forest and associated social and environmental benefits.

B Borough Tree Strategies, Opportunity Areas and Development Plans should consider how London's urban forest can be expanded and enhanced by:

1) protecting 'veteran' trees, ancient woodland and other trees of quality [108] where these are not already part of a protected site.

2) identifying the potential for more active, sustainable management of woodland and trees to deliver more benefits such as biodiversity and public access.

3) identifying opportunities for tree planting in strategic locations.

C Development proposals should ensure that, wherever possible, existing trees of quality are retained[108]. Where tree removal is absolutely necessary, there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, methodologies such as i-Tree [109] or CAVAT [110]. The planting of additional trees should generally be included in new developments, particularly large-canopied species.

8.7.1 Trees and woodlands play an important role within the urban environment. They help to trap air pollutants, provide shading, absorb rainwater and filter noise. They also provide extensive areas of habitat for wildlife, especially mature trees. The urban forest is an important element of London's green infrastructure and comprises all the trees in the urban realm, in both public and private spaces, along linear routes and waterways, and in amenity areas.

8.7.2 An i-Tree Eco Assessment of London's trees quantified the benefits and services provided by the capital's urban forest[109]. This demonstrated that London's existing trees and woodlands provide services (such as pollution removal, carbon storage, and storm water attenuation) valued at £133 million per year, and that these services are best provided by mature, large canopy trees. The cost of replacing these services if the urban forest was lost was calculated at £6.12 billion. Consequently, when trees are removed the asset is degraded and the compensation required in terms of substitute planting to replace services lost should be based on a recognised tree valuation method such as CAVAT[110] or i-Tree Eco[109].

8.7.3 The Mayor wants to increase tree cover in London by 10 per cent by 2050. Trees should be designed into developments from the outset to maximise tree planting opportunities and optimise establishment and vigorous growth. When preparing more detailed planning guidance boroughs are also advised to refer to good urban forest practice guidance [111] including Right Trees for a Changing Climate[112] and guidance produced by the Trees and Design Action Group[113].

8.7.4 The Mayor and Forestry Commission have produced Supplementary Planning Guidance on preparing tree strategies to help boroughs plan for the management of the urban forest [114]. These should be part of boroughs' wider green infrastructure strategies. The urban forest is managed by a multitude of owners, so requires collaboration to maximise urban forest benefit delivery – to date via the London Tree & Woodland Framework[115]. Through the London Tree Partnership, which includes all of the main urban forest organisations in London including the Greater London Authority and Forestry Commission, a refreshed plan should be produced that facilitates collaborative working to deliver the Mayors ambition for increased tree canopy cover.

108 Category A and B trees as defined by BS 5837:2012

109 www.forestry.gov.uk/london-itree; https://www.london.gov.uk/sites/default/files/valuing_londons_urban_forest_i-tree_report_final.pdf

110 https://www.ltoa.org.uk/resources/cavat

111 www.forestry.gov.uk/london-practice

112 http://www.righttrees4cc.org.uk

113 http://www.tdag.org.uk/guides--resources.html

114 https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/tree-and-woodland

115 www.forestry.gov.uk/lwtf

User:	Karen Dawson

Having recently had two months off work with acute stress, one of the things which made an enormous contribution in helping me to recover was being out and about locally in nature, whether walking, or running or just cycling around the neighbourhood where I live. I believe fundamentally that trees make any place better practically and emotionally. Please consider this in your London Plan. Thank you.

User:	Mark Hazelton

Please consider planting trees at every opportunity along with the need to establish real, mature woodland in London rather than the odd weak sapling. Trees do so much to soften and invigorate our landscape whilst cleaning our air. Every planning application should include tree planting plans

User:	Regent's Park Conservation Areas Advisory Committees

G7 We welcome the protection of ‘veteran’ trees and ‘trees of quality’: we seek more effective protection of mature trees.

Policy G8 Food growing

User:	Mrs Marilyn Mason

We strongly support more food growing in London, for the health and environmental benefits, and also because allotments and community gardens are places where diverse communities can meet and work together. Community gardens and allotments should have some protection.

User: Shared Assets

We support london food link's response:

This draft policy on food growing does not go far enough to recognise the role and demand for community food growing outside of traditional allotments, which are already protected.

We believe there is sufficient evidence of the many benefits of growing food, and evidence of the demand in London, which is one of the world’s leading cities on urban agriculture, to justify greater commitment to protect and expand land for food growing.

User: Shared Assets

We support london food link's response:

This draft policy on food growing does not go far enough to recognise the role and demand for community food growing outside of traditional allotments, which are already protected.

We believe there is sufficient evidence of the many benefits of growing food, and evidence of the demand in London, which is one of the world’s leading cities on urban agriculture, to justify greater commitment to protect and expand land for food growing.

User: Shared Assets

We support London food link's response: Suggested amendment:

Add *'London's resources of land for agriculture, horticulture, orchards and private and community gardens should be protected, planned, designed and managed as integrated features of green infrastructure. In major development, the Mayor will require space for the cultivation of food.'*

Justification

Consistent with other policies in the Green Infrastructure chapter, we feel that there should be a strong overview statement, including responsibilities for the Mayor to actively promote food growing in London. This would support implementation of the Mayor of London's London Food Strategy.

Further amends

Section A In Development plans, boroughs should:

1) Amend to say 'protect urban farms, existing allotments and other community food growing spaces, and encourage provision of space for community gardening, including for food growing and orchards within new developments.'

Justification

Community growing spaces typically have leases that give growers little longevity, rights or leverage to secure land, funding, resources and policy support; so our experience suggests that stronger language that supports them would be useful.

2) Identify potential sites that could be used to increase local food production for London.

Justification

The Mayor and Boroughs should safeguard existing food growing spaces with high amenity value, producing food at scale, or on high grade agricultural land, particularly on the urban fringe.

3) Ensure that land for community gardening and commercial food growing is developed in a manner that protects and enhances the soil, provides sustainable drainage and improves biodiversity.

Justification

Higher intensity large scale food production does not always provide the multi positive benefits of environmentally-friendly food growing and farming.

4) Ensure that all developments incorporate an area that can be used for communal growing of food.

Justification

Capital Growth, supported by the Mayor of London, has many examples of the multiple benefits from an area of land for communal food growing in and around, for example, housing developments, community venues, public institutions, workspaces and schools and universities. These include benefits for health, education, community cohesion, biodiversity, enterprise and local jobs.

User: Shared Assets

We support London Food Link's response:

The topics covered in this chapter are not as directly relevant to food and farming, yet we know that a sustainable food and farming system does require infrastructure.

We would welcome:

- An **acknowledgement of the GHG emissions related to food delivery and food waste** and a strategy to tackle the pollution associated with the large volume of food and food waste that is transported across London every day.
- A pioneering approach to **promoting sustainable diets** and creating the infrastructure needed to ensure this happens through provision of land for growing food, premises for local food enterprises, and for efficient distribution within the capital, given the significant level of emissions associated with what Londoners eat.
- A commitment to create infrastructure for low GHG emissions food delivery in the development of new large communities.
- Leadership from London on how cities protect vital natural resources for food production, including soil, pollinators and water in and around the capital, including a commitment to protect all high quality Grade 1 farm land for food growing and consider hinterland for new market gardens instead of housing or other developments, to increase urban and peri-urban food production and distribution.

User: London Food LInk /Sustain

This draft policy on food growing does not go far enough to recognise the role and demand for community food growing outside of traditional allotments, which are already protected. We do not want to object but really feel that this needs further development to become a meaningful policy. We believe there is sufficient evidence of the many benefits of growing food, and evidence of the demand in London, which is one of the world's leading cities on urban agriculture, to justify greater commitment to protect and expand land for food growing**.**

New Point

Add 'London's resources of land and soil for agriculture, horticulture, orchards and private and community gardens should be protected, planned for, designed and managed as integrated features of a healthy city and green infrastructure. In major developments, the Mayor will require space for the cultivation of food in order to create a greener and more resilient city.'

Consistent with other policies in the Green Infrastructure chapter, we feel that there should be a strong overview statement, including responsibilities for the Mayor to actively promote food growing in London. This would support implementation of the Mayor of London's London Food Strategy. London has also signed up to the Milan Urban Food Policy Pact in 2015 which stated that: 'current food systems are being challenged to provide permanent and reliable access to adequate, safe, local, diversified, fair, healthy and nutrient rich food for all'. It suggests action to: 'Protect and enable secure access and tenure to land for sustainable food production in urban and peri-urban areas, including land for community gardeners and smallholder producers.'

A) Amend to say

1)'protect urban farms, existing allotments and other community food growing spaces, particularly those with significant involvement or food production and encourage provision of space for community gardening, including for food growing and orchards, within new developments.'

The Mayor and Boroughs should safeguard existing food growing spaces with high amenity value, producing food at scale, or on high grade agricultural land, particularly on the urban fringe.

Justification: Community growing spaces typically have leases that give growers little longevity, rights or leverage to secure land, funding, resources and policy support; so our experience suggests that stronger language that supports them would be useful.

2)Identify potential sites that could be used to increase local food production for London, with long-term agreements.

Justifcation: There is a need for an increase in land for growing food, particularly with long leases to create a more resilient food system, ensure access to nature and provide the opportunity for sustainable livelihoods.

3) Ensure that land for community gardening and commercial food growing is developed in a manner that protects and enhances the soil, provides sustainable drainage and improves biodiversity.

Higher intensity large scale food production does not always provide the multi positive benefits of environmentally-friendly food growing and farming.

4) Ensure that all developments incorporate an area that can be used for communal growing of food.

Capital Growth, supported by the Mayor of London, has many examples of the multiple benefits from an area of land for communal food growing in and around, for example, housing developments, community venues, public institutions, workspaces and schools and universities. These include benefits for health, education, community cohesion, biodiversity, enterprise and local jobs.

User:	London Food LInk /Sustain
In addition. Land for food growing also contributes significantly to access to nature and wildlife diversity.	

User:	London Food LInk /Sustain

Currently this statement suggests that there is no way to ensure that small scale food growing is given prominence and protection. We would like this statement to include a bolder vision to protect these assets: *That as pressure to build on open space increases, smaller growing spaces should be recognised and protected for the amenity they provide particularly in dense areas. There is also opportunity to include such spaces in new developments, particularly those that replace existing gardens, as well as gardens connected to social infrastructure. In addition there should be consideration of other areas, such as green roofs and walls, re-utilising existing under-used spaces and incorporating spaces for food growing in existing and new schools.*

User:	London Food LInk /Sustain

We welcome this statement and the recognition that the type of growing system impacts on the environmental benefit, but recommend that the climate emissions are also linked to the type of growing system used.

User:	London Food LInk /Sustain
This statement should say that the food system can have a positive impact on the environment.	

User:	London Food LInk /Sustain

It would be useful to recognise that to date Capital Growth has supported over 2800 different food growing spaces covering over 70 ha of land and involving over 150 000 Londoners.

User:	Mr Chris Gannaway
Strongly support this policy but would like to see more detail including orchard cover	

User:	London Forum of Amenity and Civic Societies

London Forum supports this policy but in Policy G8 A 1) 'farm land' should be put after "allotments".

User: London Assembly Green Party Group

There is a compelling case that food security should be a priority for the new London Plan. The Assembly highlighted in 2010 that London is very dependent on food imports and has only three or four days of food stocks available if there is disruption to supply. Despite this much of the agricultural land around London – around 15 per cent of total area, mostly in the Green Belt – is not actively farmed. A new policy is needed to ensure that land for community gardening and commercial food growing is developed in a manner that protects and enhances the soil, provides sustainable drainage and improves biodiversity. Land uses that provide these functions should be prioritised, particularly within the Green Belt.

Proposed amendments to Policy G8 (changes highlighted in bold)

A (1) protect existing allotments, **urban farms and community growing spaces** and encourage provision of space for community gardening, including for food growing, within new **and existing** developments.

A (2) identify potential sites, **including within developments,** that could be used for commercial **and community** food production.

New part:

A (3) protect 'best and most versatile farmland' from development.

New section:

B Growing more food for London's food security should be one of the most beneficial and productive uses in the Green Belt.

Cultivating the Capital. London Assembly Planning and Housing Committee, Jan 2010
https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/archives/archive-assembly-reports-plansd-growing-food.pdf

User:	Mrs Seonaid Royall

This should go much further to protect and enhance food growing for its multiple benefits. *London's resources of land and soil for agriculture, horticulture, orchards and private and community gardens should be protected, planned for, designed and managed as integrated features of a healthy city and green infrastructure. In major developments, the Mayor will require space for the cultivation of food in order to create a greener and more resilient city.*

User:	Watford Borough Council

Whilst the protection of allotments is welcome, there may be exceptional circumstances where they may need to be relocated (e.g. if there was significant and reasonable justification and they should be reprovided.)

Suggested change: Insert wording that exceptional circumstance is required to remove / change allotments.

User:	ms janie bickersteth

London’s resources of land and soil for agriculture, horticulture, orchards and private and community gardens should be protected, planned for, designed and managed as integrated features of a healthy city and green infrastructure. In major developments, the Mayor will require space for the cultivation of food in order to create a greener and more resilient city.

User:	Ms Sacha bennett

This should go much further to protect and enhance food growing for its multiple benefits. Add *‘London’s resources of land and soil for agriculture, horticulture, orchards and private and community gardens should be protected, planned for, designed and managed as integrated features of a healthy city and green infrastructure. In major developments, the Mayor will require space for the cultivation of food in order to create a greener and more resilient city.’*

User:	Ms Elizabeth Nuckowska

Totally support the encouagement of food growing at all levels. We have a number of succesful City Farms, which apart from food production also bring numerous educational and well being benefits to people. Encouraging more local farming and food production would also bring Green Benefits.

User: Royal Botanic Gardens, Kew

We were pleased to see Food Growing included in the London Plan. Kew's Kitchen Garden was voted 'most inspirational vegetable garden 2016' by the Great British Growing Awards. It was created for the BBC series 'Kew on a Plate' on a site formerly used to grow produce for George III.

G8A1

Beyond the provision and protection of allotments, we believe more assistance is needed to set allotment holders up with the tools they need to make the most of their plot and maximise the space for food growing. Basic training should be provided to new allotment holders; an 'induction' scheme would be particularly efficient. Council and or community involvement would be required to set this up. Better management and use of allotments would enhance biodiversity and natural capital in the city, by the introduction of a variety of plants and flowers.

The intent to encourage new developments to make space for community gardening is welcome, however we would recommend stronger language around this. These spaces need proper management and smart planting; for example, wildflower beds planted around the plots to encourage pollinators would create a 'growing infrastructure' before the community has even begun planting.

Community groups and individuals should be encouraged to develop proposals for community garden schemes, with innovative proposals such as hydroponic gardens promoted

G8A2

We support the identification of space for commercial food production. We would encourage the Mayor to look to the example of Havana; the Cuban capital is an inspiring example of best practice in this area.[1] Their principle of maximising space and utilising any strip of land for commercial food production could be applied to certain areas of London.

[1] https://www.architectural-review.com/rethink/cubas-urban-farming-revolution-how-to-create-self-sufficient-cities/8660204.article

User: Ms Torla Evans

The growing of fruit and vegetables locally is something to encourage as much as possible. We produce a tiny percentage of the food we consume and rely far too heavily on imports . When we leave the E.U. we will be sourcing food from far away which is incrediby bad news for us and the environment. Growing food in schol environments is a great idea to be encouraged. Greening urban areas and planting fruit trees locally in estates and on pieces of wasteland has been very successful in West Norwood and Brixton to name a few examples. Encouraging local people to get involved is essential to widen access to this activity .

User:	School Food Matters

This should go much further to protect and enhance food growing for its multiple benefits. Please add:

"London’s resources of land and soil for agriculture, horticulture, orchards and private and community gardens should be protected, planned for, designed and managed as integrated features of a healthy city and green infrastructure. In major developments, the Mayor will require space for the cultivation of food in order to create a greener and more resilient city."

User:	Putney Society

Policy G8 - Food growing
We support this policy. It is a pity the policy was not applied by the LCC in earlier times!

User:	Telegraph Hill Society

G8 Objection

Policy G8A1 should include reference to the use of garden space for the production of food.

Private gardens, as well as allotments, are used for the production of food. This should be encouraged where possible in Development Plans.

User:	Butterfly Conservation

? We urge that consideration is given to the role of insects - honey bees, wild bees, butterflies, moths, etc. - as pollinators. Biodiversity will be important to the success of food production, especially in areas of deficiency of access to nature.

User:	London Green Belt Council

We also support the Plan’s stipulation that borough plans should protect allotments and encourage new space for community gardening within developments. The LGBC would like to see many more sites identified that could be used for food production, and promotion of innovative solutions for small-scale food growing.

User: London Borough of Islington

Draft London Plan Policy Policy G8 Food Growing

Islington Response

We support the policy and welcome reference to small scale food growing and re-utilising existing under-used spaces. Islington has a rich history of supporting and encouraging community gardening and food growing. We are currently working in partnership with the Octopus Community Network's Wild Places, We Can Grow project supporting food growing projects on estates.

User:	Mr Oli Perrins

this policy does not go far enough to support and encourage food growing and faring within metropolitan land and the Green Belt, despite the evidence of its multiple benefits.
Policy G8: This should go much further to protect and enhance food growing for its multiple benefits. Add ‘London’s resources of land and soil for agriculture, horticulture, orchards and
private and community gardens should be protected, planned for, designed and managed as integrated features of a healthy city and green infrastructure. In major developments, the
Mayor will require space for the cultivation of food in order to create a greener and more resilient city.’

User:	London Borough of Barnet

We welcome and generally support the approach to green infrastructure set out in the DLP. Barnet's recently adopted Green Infrastructure SPD broadly reflects and is consistent with DLP policies on Green Infrastructure and Natural Environment. Barnet recognises the need for food growing spaces within the Green Infrastructure SPD and will give consideration to the inclusion of a policy within our new local plan which further supports community food growing.

User:	Thames Water

We support this policy in principle, but in relation to Part A 2) would need to assess the water impact of commercial food production and assess each proposal on its own merits to understand how water intensive they were and whether this had an impact on water infrastructure .

User: London Assembly Labour Group

Suggested changes

Policy G8 on Food growing makes no mention of the new developments in commercial farming in cities such as hydroponic farming. Such new developments should be added.

Justification for policy recommendations

London should be leading the debate on new forms of farming for urban populations and the implications they have for climate change, food security and ethics.

Suggested changes

“increased” should be added to A1 so it now reads “protect existing allotments and encourage increased provision of space for community gardening, including for food growing, within new developments”

Justification for policy recommendations

To provide more opportunity for Londoners to grow their own food.

User:	London Waste and Recycling Board (LWARB)

1. We support policy G8 – Food growing and suggest composting is also considered within this policy and the local use of any resulting compost. We also support the recognition that innovative solutions for delivery of food growing should be considered to better utilise space. This should include meanwhile space. We support the recognition that urban food growing can help with healthier eating, support the local economy and reduce transport emissions.

User:	London Borough of Lambeth
Lambeth supports this policy.	

User:	London Borough of Haringey

The Council supports the policy to provide Food Growing within developments. However, the success of these is reliant on the future occupiers of the development. As such, any proposal for this, whilst supported, must be supported with a Management and Maintenance Plan to ensure its on-going success.

User:	London Borough of Barking & Dagenham

The Council strongly supports the focus on good growing something which has a proud history in the borough and is flourishing today at for example Dagenham Farm and Gale Street Organics. The plan should consider how to ensure these are accessible to diverse communities so as to narrow health inequalities.

User:	London Borough of Lewisham

We support G8, especially protecting and encouraging the provision of allotments and encouraging community gardening and food growing. This should be the priority for resources. Brockley was renowned as an area of market gardens especially recognised for its pear orchards and this should be recognised at the local level.

User:	Environment Agency
We welcome this policy, which will improve Londoners health, and the value people attach to the natural environment.	

User:	London Borough of Brent

The Council supports this policy.

Amend Policy G8A2 to:

"identify consider potential sites that could be used for commercial food production where appropriate".

User:	London Borough of Bromley

The general thrust of the policy is welcomed reflecting Bromley's approach in its emerging Local Plan, notably draft policy 24 on allotments and leisure gardens and the supporting text to draft Policy 123 'Sustainable Design & Construction which references food growing (proposed minor modification).

User:	London Borough of Tower Hamlets
Policy is supported	

User:	Royal Borough of Kingston
Support.	

User:	London Borough of Waltham Forest

We do not consider that allotments need to be included in this plan because they have sufficient protection.

We agree with identifying sites for commercial food production but consider strategically the GLA and Mayor should lead on this due to the resource implication at Borough level.

User: London Borough of Hillingdon

The policy transfers a number of key responsibilities for strategic nature conservation from the GLA to boroughs.

Criterion A of the Policy states:
‘Sites of Importance for Nature Conservation (SINC) should be protected. The greatest protection should be given to the most significant sites.’

It is not appropriate for the London Plan to pass on responsibility to boroughs to determine the scope of this part of the policy. If there are significant strategic sites, then the draft plan should identify them and then define what is meant by 'greatest protection'.

Criterion B sets the criteria for boroughs to review Metropolitan grade SINCS. These are determined because of their strategic importance for London and therefore it is entirely the responsibility of the GLA to identify, amend or remove Metropolitan grade SINCs.

Specific comments on this policy are as follows:
• Criterion C should be amended to: ‘Where harm to a SINC (other than a European (International) designated site) is unavoidable, the following hierarchical approach should be applied to minimise development impacts.’
• Criterion C, part 1 should delete reference to ‘special’.
• Criterion C, part 2 should be amended to: ‘Minimise the impact and mitigate it by improving the quality or management of the rest of the site to achieve a net improvement in biodiversity.’
• Criterion C, part 3 should be removed and replaced with: ‘Achieve a net improvement in biodiversity off site through an appropriate compensation in exceptional cases where the benefits of the development proposal clearly outweigh the biodiversity impacts.’
• Criterion D should be replaced with the following: ‘All developments should achieve a net improvement in biodiversity with major development proposals accompanied by a statement of how biodiversity enhancements have been included within the development.’

User:	London Borough of Merton
Support Policy G8 is supported, as food growing makes a positive contribution to the creation of a healthier food environment.	

User:	London Borough of Hackney
Hackney supports this policy	

User:	London Borough of Hounslow

LB Hounslow supports the protection of allotments and agricultural land in the Local Plan, and believes that provision of growing space/community gardening should be encouraged in existing green spaces not just new developments. Therefore, LBH suggests the following wording:
Policy G8 Food growing

A 1) protect existing allotments and encourage provision of space for community gardening, including for food growing, within existing and new developments.

User:	Westminster City Council

This policy is likely to be particularly irrelevant in central London boroughs like Westminster and this should be recognised by changing the language that tends to suggest this is an issue every borough should address in their local plans. It should be made clear that any requirement on boroughs to identify sites that could be used for commercial food production must be done within public health and food safety parameters. The heavily urbanised nature of most of London, the competing pressures on finite land, and existing levels of air quality, means there will be limited opportunities to identify such sites.

User:	Alison Hatt

I endorse Policy G8 and would urge for councils to try to increase the provision of allotments and community gardens; certainly there should be no threat to sell off allotment land for development.

User:	London Borough of Southwark

The council considers the policy would be strengthened by adding reference to the previous land uses to avoid the reuse of polluted soil fro food growing purposes.

User:	London Borough of Wandsworth

Food growing is both good for the environment, mental health and education (e.g. teaching children about how food is produced as well as healthy eating. As a consequence it is important that existing allotments are protected and expanded as well as ensures that there are opportunities for community gardens in new developments. Policy G8A does not make a distinction between community food growing spaces and allotments. These are different things and come with different long term security over their tenure and purpose. This distinction should be further considered and wording changed if necessary. Para 8.8.2 needs to draw a clearer distinction / better define a green roof for food growing as distinct from a living roof for biodiversity.

User: London Borough of Richmond Upon Thames

Food growing is both good for the environment, mental health and education (e.g. teaching children about how food is produced as well as healthy eating. As a consequence

it is important that existing allotments are protected and expanded as well as ensure that there are opportunities for community gardens in new developments.

Policy G8A does not make a distinction between community food growing spaces and allotments. These are different things and come with different long term security over

their tenure and purpose. This distinction should be further considered and wording changed if necessary. Para 8.8.2 needs to draw a clearer distinction / better define a green

roof for food growing as distinct from a living roof for biodiversity. In the Richmond context of limited land availability, provision of space for food growing is

likely to be led through the protection of existing allotments and private amenity space. The Council is working through Public Health with other agencies to support sustainable

food initiatives. Beyond planning, there are other initiatives such as the Food Growing Schools London Project which schools in the borough participate in, and the policy could

recognise this will be met through partnership working.

User:	Expedition Engineering and Useful Studio
The Supporting text could refer to the potential for industrial roof space providing commercial food growing opportunities and could refer to potential for food growing on roofs generally and integrating food growing into open space within developments.	

User:	London Borough of Harrow

The Council supports the policy to provide Food Growing within developments. However, the success of these is reliant on the future occupiers of the development. As such, any proposal for this, whilst supported, must be supported with a Management and Maintenance Plan to ensure its on-going success.

User:	Royal Borough of Greenwich

Reference to interventions such as planting fruit trees or hedgerows would help to emphasize that food growing can also be integrated into more general landscaping/support other policies (e.g. G7 Trees and Woodlands) as well as by identification of dedicated space for food growing. The Orchard Project is a good example.

User:	Royal Borough of Greenwich
This diagram is not clear. Names should be included as well as numbers, and a link provided to the SPG.	

User: Mr Joe Ward

We welcome support for food growing in London and this should be supported by a policy to protect good farmland from development.

Proposed change:

Policy G8 should include a sub-section 3) which states: ‘**should protect ‘best and most versatile farmland’ from development.**

Rationale: Access to suitable land is a major constraint on increasing the supply of local food within London and providing opportunities for community-supported agriculture. High quality, or ‘best and most versatile’ land under the Agricultural Land Classification system, is in short supply and should be protected from development in local plans and development control.

User: (FOE) Friends of the Earth England Wales and Northern Ireland

We support this policy as we believe that everyone should be given the opportunity to grow their own food. This will bring benefits in terms of access to fresh, healthy food, food security and active lifestyles. We feel however, the policy would benefit from being strengthened. For example, a further criterion B should set out how food growing opportunities should be identified as an integral part of major development proposals and regeneration schemes and how planning applications which would result in a loss of such opportunities will be opposed. We suggest further consideration be given in the plan to acknowledging the role of agriculture, city farms and community food growing enterprises in the capital, and the benefits of these, contributing to resilience and food security, health and wellbeing, and ways these activities might be supported and encouraged through the planning system.

User:	London Borough of Enfield

Policy G8 focuses on ‘Food growing’ and does not offer flexibility on allotment protection and provision. Some allotment sites can be used to provide affordable housing with sites being re-provided in the Green Belt.

User: Enfield RoadWatch

Food Growing

We support **Policy G8** but think it should be strengthened to encourage the productive use of existing agricultural land. Our borough, Enfield, has a considerable acreage of arable and grazing land, much owned by developers and all designated Green Belt, which has been left 'deliberately' unproductive. It should be returned to agricultural use with all the benefits that would bring in terms of food security, supporting the local economy, reducing transport emissions, addressing climate change and, with good stewardship, enhancing biodiversity. In addition there should be protection for the horticultural industry, such as the nurseries at Crews Hill, also in the Green Belt, so that they can contribute more to the growth of local food.

We suggest the following changes to **Policy G8**

Add the following items to **G8 A**

3) Encourage and facilitate food production and discourage unproductivity on agricultural land.

4) Ensure that horticultural sites are used for horticultural purposes only.

5) Promote, support and protect city farms

User:	HTA Design LLP

In Policy G8 relating to food growing the Mayor should give consideration to placing provisions within the plan that enable boroughs to secure adequate replacement allotments in alternative locations, where this is appropriate, for example to improve accessibility of allotments, or to facilitate the best use of land to be made.

User: Just Space

G8 Food Growing

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

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

At the Strategic Level

Land will be made available and protected to support community food growing and food production enterprises in order to meet the longer term goal of achieving a resilient food system and providing fresh, nutritious food for Londoners. This will contribute to enterprise, job-creation, training schemes, and London's efforts to address climate change. There will be an increasing amount of sustainable and locally produced food consumed in and around London, through development of strategic partnerships between land owners, and urban, peri-urban and rural food growing projects. 1 [see references at foot of this section] Food growing and production and distribution are closely related to housing, health, the economy and the environment. It is essential to adopt an approach that is intersectional, participatory and inclusive for consumers, producers and distributors. Food production provides employment and training and contributes to sustainable economic development.

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

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

— Partnership between the GLA, Sustain, Local Authorities and established food production enterprises to identify food production sites on GLA and local authority-owned land for new entrants in the sector. This will use best practice models between local authorities and food growing enterprises.

— Career-long agricultural tenure-ships offered by local authorities and GLA for food production sites, to provide sufficient time to develop financial viability, benefits of biodiversity and community development, and soil replenishment through organic food production.

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

— Accredited training in organic food production.

— Paid work placements — apprenticeships and shorter-term placements (e.g. 6 months) that support (young) people to further develop skills in the work environment and provide sustainable employment opportunities.

— Associated “next steps” training — e.g. enterprise training, community development training.

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

At the Local Level

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

Local Authorities must identify and safeguard land and Infrastructure for commercial food production and community gardening, including allotments, parks, orchards, schools and large commercial small scale glass houses.

Local Authorities to make accessible a public register of available land e.g. park land, housing estates, brownfield sites or temporarily available sites and to administer a list of interested parties looking for land for production and marketing of food for London. 2

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

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

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

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

GLA and Local Authorities to independently purchase at least 15% of their total supply of foodstuffs from small-scale, nonchemical producers located in and around London by 2020,

25% by 2030 and 30% by 2036 — to increase demand for short supply chain and build sustainable local economies.

All This Requires:

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

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

Notes and References:

1. Urban, peri-urban and rural food growing are characterised by the areas in the city, between the city and the countryside, and the countryside, respectively.

2. The city of Almere (Netherlands) is an example that demonstrates how urban agriculture can become a driver for regeneration. The Dutch University in Wageningen designed a virtual rural-urban city district called “Agromere”. In this virtual district, agriculture

and urban living merge with each other taking into account the need of all parties involved. This project inspired the city of Almere to implement urban agriculture in its development plans. The draft structural vision “Almere 2.0” allocates land for 15000 new homes with urban agriculture as a main element of the green infrastructure.

3. “Since food policies are closely related to many other challenges and policies, such as poverty, health and social protection, hygiene and sanitation, land use planning, transport, energy, education, and disaster preparedness, it is essential to adopt an approach that

is comprehensive, interdisciplinary and inter-institutional”. Taken from the Milan Urban Food Policy Pact (2015) which was signed up to by the Mayor in 2015 and its points are to be incorporated into the enhanced London Food Strategy.

4. Around 15 per cent of the capital’s total area is agricultural land mostly in the Green Belt — less than 10% is actively farmed. (*Cultivating the Capital, food growing and the planning system in London*. January 2010 London Assembly)

5. Agriculture is one of the few land uses permitted in the Green Belt through National Planning Policy Framework (para 89) but it is often given a lower priority. See p31 and Appendix 6 — *Cultivating the Capital: food growing and the planning system in London* 2010, London Assembly.

User:	London Borough of Bexley

Whilst the provision and protection of allotment/community gardening space is welcomed in **Policy G8 Food growing**, it is potentially unrealistic to expect developers to sacrifice valuable space on sites without further incentives. Consideration should be given to whether there could be scope for including community gardens as an urban greening factor to provide such an incentive.

User:	Federation of Small Businesses
Consideration should be given for the encouragement of commercial beekeeping to support commercial food production.	

User:	London Healthier Places

The LHP Network supports the protection of existing allotments and believes that provision of space for community gardening, including food growing is positive. There is good evidence that growing and gardening are beneficial to health and wellbeing, promoting physical activity and social interaction. Studies have also demonstrated that participation in food growing can influence healthier eating especially for children and families.

User:	Rosalind Readhead
Food growing must be available to all Londoners	

User:	Rosalind Readhead

POLICY 4.8.e I support the range of London’s markets, including street, farmers’ and, where relevant, strategic markets, complementing other measures to improve their management, enhance their offer and contribute to the vitality of town centres. This must be broadened to develop the relationship between Londoners and the local food growers outside London. Helping with picking and building cultural exchanges.This is important for food security, health and well being.

User:	Pilbrow & Partners
Protection for existing allotments to be reinforced as part of this policy	

User: CPRE London

Food growing

We welcome support for food growing in London and this should be supported by a policy to protect good farmland from development.

Proposed change:

Policy G8 should include a sub-section 3) which states: ‘**should protect ‘best and most versatile farmland’ from development.**

Rationale: Access to suitable land is a major constraint on increasing the supply of local food within London and providing opportunities for community-supported agriculture. High quality, or ‘best and most versatile’ land under the Agricultural Land Classification system, is in short supply and should be protected from development in local plans and development control.

User:	London Wildlife Trust
We support Policy G8.	

User:	Brixton Society

G8, Food-growing: There is growing interest locally, so we certainly endorse this policy. New developments have limited scope for providing larger open
spaces due to pressure to increase densities, but some credit should be given to schemes which provide opportunities for small-scale food-growing.

User:	London Property Alliance
This is not a strategic matter for London.	

User:	PAFH - Physical Activity for Health (London Sport)

We strongly support the protection of existing space and provision of new space for community gardening and food growing. Community spaces that encourage food growing contribute towards supporting healthy lifestyles and provide wider social benefits.

User:	London Borough of Sutton

SUPPORT WITH CONDITIONS. The London Borough of Sutton supports local food gowing and the use of innovative techniques, including green infrastructure but this must not be at a detriment to creating biodiverse green infrastructure and may only be appropriate in a limited number of developments.

User:	Ealing Dean Allotment Society

Existing allotments are afforded protection in the new draft plan in Policy G8, but their benefits are treated only superficially. Not all allotments are protected under the allotment acts and privately owned allotments are bound to come under pressure for development, given the targets for new high density residential development.

User: Ealing Dean Allotment Society

Allotments sit somewhat uncertainly in the hierarchy of ‘green and open space’. Policy G4 calls for the protection of local green and open spaces, but in Policy G4 C which requires boroughs to carry out a needs assessment for such spaces, the draft plan refers to *public* green and open space, as categorised in Table 8.1. It is not clear whether the semi-public nature of allotments deems their inclusion in or exclusion from this table. In this table, Local Parks and Open Spaces and Small Open Spaces include “other areas of a specialist nature, including nature conservation areas”.

Table 8.1 should be amended to “including nature conservation areas and allotments” within appropriate categories.

Alternatively, it may be appropriate to include allotments in the category of Linear Open Spaces in the same table, as the description refers to features which may not be fully accessible to the public (although allotments are not necessarily linear). It would strengthen the protection afforded to existing allotments if they were explicitly included in table 8.1 and therefore clearly within the scope of Policy G4.

In the GLA Assembly’s own report of 2006, “A Lot to Lose: London’s disappearing allotments”, it states that 32 or 4.2% of London’s allotment sites were lost in the previous ten years and that the rate of loss of allotment plots was even higher at 6.8%. This is because allotment sites tend to be chipped away rather than lost altogether. In the words of that report: “It is this insidious loss of five plots shaved off at the periphery that is the real threat to allotment provision in London”. This kind of loss can only be prevented if there is a requirement to replace the land lost with an equivalent area of new allotments. It is not enough to compensate the loss with green roofs, tree planting or other unspecified greening measures. Financial contributions in lieu, must be adequate to purchase equivalent areas of land and banked by the local authority strictly for that purpose.

The Draft New Plan treats allotments as spaces for food growing, which is a correct but narrow definition of the purpose of allotments. They are only referred to by name on a single occasion in the draft plan and that is in Policy G8. Paragraph 8.8.1 devotes one sentence to the additional benefits - other than directly food related - that community food growing can have for social integration, community cohesion, and improved mental and physical health. It is certainly true that allotments can enhance local residents' quality of life by providing a location for healthy physical activity and social interaction but that is not all that allotments contribute. Like the various categories of public open space in Table 8.1, allotments conserve and enhance the open green environment, providing a local visual amenity, assist in combating air pollution, provide wildlife habitat and support bio-diversity. In many cases, allotments are also a heritage asset, although they are rarely given that formal status. Most have been in existence for a long time, in our own case since 1832. They can be important reminders of our social history and often conserve an element of an older landscape, in our own case former common land.

The demand for allotments continues to grow. The GLA report of 2006 showed that across London waiting lists stood at 4,300 applicants compared with 3,000 a decade earlier. In some boroughs it would apparently take ten years to get an allotment. On many sites including our own, full size plots are divided in half so that more people can gain access to them. It goes without saying that if London is to house an additional 1.9m people by 2041 the demand for allotments will only increase further. The housing target for LB Ealing is a massive 28k new homes to be built, implying an approximate 25% increase in population. By comparison to the housing section, the policies and objectives for Green Infrastructure are weak and aim at best to stand still. This huge increase in population will need more amenities and an enhanced green environment to offset the lack of private space in high density residential development. Existing provision must be given strong protection but also boroughs should be actively investigating the provision of additional land for open green areas and recreational facilities, including allotments.

The requirement to identify other potential spaces that could be used for food production, including allotments, in Policy 7.22 C of the current London Plan has been changed in Policy G8 A of the Draft New Plan, to include only sites for commercial food production. The current policy should be retained in the new plan.

Proposed Amendment

A In Development Plans, boroughs should:

1) protect existing allotments and encourage provision of space for community gardening, including for food growing, within new developments

2) ensure that any unavoidable loss of allotment plots is replaced with new provision of equivalent area and quality

3) identify and bring forward new sites to be used for commercial food production, allotments and community gardens

Policy G8 Food Growing

User: CFGN Community Food Growers Network

We support the following change to policy and addition of B, C and D directly from the Milan Urban Food Policy Pact (2015) to which London is signed up to with 162 other cities:

A. In Development Plans, boroughs must:

- **protect existing allotments, community gardens, agroecological food production sites and community kitchens with secure long-term agreements (e.g. 100 years)**
- **Identify potential sites with partner organisations that could be used for long-term (e.g. 100 years) community managed gardens, agroecological food production and community food hubs with cooking and training facilities in urban, peri-urban and greenbelt areas**

Boroughs, in their Development Plans, through participatory consultation with relevant community sectors will undertake a needs assessment of social

infrastructure such as community gardens to meet the needs of London's diverse communities to express themselves and freely associate.

GLA and boroughs to work with partners to set up Community Land Trusts and land banks that enable equitable opportunities and community-led access to land suitable for needs (ie sunlight and water requirements).

Secure land tenure for the above activities will contribute to enterprise, job-creation, training schemes, and London's efforts to address climate change.

B. The GLA and boroughs will encourage interdepartmental and cross-sector coordination at municipal and community levels, working to integrate urban food policy considerations into social, economic and environment policies, programmes and initiatives, such as, inter alia, food supply and distribution, social protection, nutrition, equity, food production, education, food safety and waste reduction

C. The GLA and boroughs will work to develop sustainable food systems that are community-led, resilient, safe and diverse, that provide healthy and affordable food to all people in a human rights-based framework, that minimise waste and conserve biodiversity while adapting to and mitigating impacts of climate change

D. The GLA and boroughs to *work with community partners and networks* to review and amend existing urban policies, plans and regulations in order to encourage the establishment of equitable, resilient and sustainable food systems

London signed up to the Milan Urban Food Policy Pact in 2015 which stated that: ‘current food systems are being challenged to provide permanent and reliable access to adequate, safe, local, diversified, fair, healthy and nutrient rich food for all; and that the task of feeding cities will face multiple constraints posed by inter alia, unbalanced distribution and access, environmental degradation, resource scarcity and climate change, unsustainable production and consumption patterns, and food loss and waste.’

The Pact (2015) suggests action to: ‘Protect and enable secure access and tenure to land for sustainable food production in urban and peri-urban areas, including land for community gardeners and smallholder producers, for example through land banks or community land trusts; provide access to municipal land for local agricultural production and promote integration with land use and city development plans and programmes.’

The proposals are aimed to support and expand the multiple benefits of the community food sector which can help to meet GLA and borough council strategic outputs including: mental and physical health, access to nutritious food, low environmental impact, job creation, access to green space, training opportunities, resilient local economies, community spaces.

There are numerous projects in London running community gardens, community food hubs and community kitchens developing activities to meet the aims of the Milan Urban Food Policy Pact and can be effective partners with the GLA and boroughs to expand programmes to meet strategic aims of the London Plan. These projects can be found through Just Space, Capital Growth, Women’s Environmental Network, London Coalition against Poverty, Community Food Growers Network, Federation of City Farms and Gardens.

Henceforth, we believe that this is essential to the London Plan's over-arching good growth principles as amended in the CFGN submissions (See above for our amended GG1, GG2 and GG3) and as amended in the Just Space submission on Good Growth: GG1 (Building strong and inclusive communities), GG2 (Making the best use of land), GG3 (Creating a healthy city), GG5 (Growing a good economy), GG6 (Increasing efficiency and resilience)

Please see full PDF for more detail

User:	CFGN Community Food Growers Network

Overall it appears that the role of food growing in terms of the health benefits, wider social and environmental benefits is not fully appreciated or integrated into the draft New London Plan despite the strong evidence on this topic and the Mayor of London’s commitment to a refreshed London Food Board and London Food Strategy.

User:	London Borough of Newham

Policy G8 Food growing

LBN are generally supportive of this policy which is complementary to Newham's Draft Revised Local Plan. However, A.2 could additionally recognise the opportunity and role of industrial sheds (e.g. aquaponics agriculture) in food growing, particularly in contaminated areas.

Additionally, more guidance on identifying areas for commercial food production would be welcomed.

User: Ms Deirdre Woods

11.. FOOD GROWING

I support the following change to policy and addition of B, C and D directly from the Milan Urban Food Policy Pact (2015) to which London is signed up to with 162 other cities:

A. In Development Plans, boroughs **must:**
- protect existing allotments, community gardens, agroecological food production sites and community kitchens with secure long-term agreements (e.g. 100 years)
- Identify potential sites with partner organisations that could be used for long-term (e.g. 100 years) community managed gardens, agroecological food production and community food hubs with cooking and training facilities in urban, peri-urban and greenbelt areas

Small scale and community farming and food production need to be central to any vision for London as it is a vital to Londoners future as other major issues Londoners face such as air, water, waste or housing. The Mayor can promote this vision through land use policies and funding strategies. The Mayor must:

- **promote food production through schools, education and developing training programmes for new growers accessible to all particularly in areas of higher deprivation and making public land available to community growers**
- **Provide financial incentives funding growing apprenticeships and training**
- **Make local authorities provide more support and land to existing community growers including community kitchens , food buying co-ops, community gardens and food hubs.**
- **Provide community grants for start-up costs and advice to develop financially sustainable models.**
- **Support development of new community food growing initiatives, community meals and kitchens. Through GLA binding food strategies and Local Authority Food PLans.**
- **Facilitate access to start-up capital through support schemes, grants and low interest loans**
- **Increase availability of financing to reduce the cost of certification**

(TOFS, 2015 and PFP, 2017)

GLA and boroughs to work with partners to set up Community Land Trusts and land banks that enable secure community-led access and tenure of land suitable for needs (ie sunlight and water requirements).

Secure land tenure for the above activities will contribute to enterprise, job-creation, training schemes, and London's efforts to address climate change.

B. The GLA and boroughs will encourage interdepartmental and cross-sector coordination at municipal and community levels, working to integrate urban food policy considerations into social, economic and environment policies, programmes and initiatives, such as, inter alia, food supply and distribution, social protection, nutrition, equity, food production, education, food safety and waste reduction

C. The GLA and boroughs will work to develop sustainable food systems that are inclusive, resilient, safe and diverse, that provide healthy and affordable food to all people in a human rights-based framework, that minimise waste and conserve biodiversity while adapting to and mitigating impacts of climate change

D. The GLA and boroughs to *work with community partners and networks* to review and amend existing urban policies, plans and regulations in order to encourage the establishment of equitable, resilient and sustainable food systems

London signed up to the Milan Urban Food Policy Pact in 2015 which stated that: 'current food systems are being challenged to provide permanent and reliable access to adequate, safe, local, diversified, fair, healthy and nutrient rich food for all; and that the task of feeding cities will face multiple constraints posed by inter alia, unbalanced distribution and access, environmental degradation, resource scarcity and climate change, unsustainable production and consumption patterns, and food loss and waste.'

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The proposals are aimed to support and expand the multiple benefits of the community food sector which can help to meet GLA and borough council strategic outputs including: mental and physical health, access to nutritious food, low environmental impact, job creation, access to green space, training opportunities, resilient local economies, community spaces.

There are numerous projects in London running community gardens, community food hubs and community kitchens developing activities to meet the aims of the Milan Urban Food Policy Pact and can be effective partners with the GLA and boroughs to expand programmes to meet strategic aims of the London Plan. These projects can be found through Just Space, Capital Growth, Women's Environmental Network, London Coalition against Poverty, Community Food Growers Network, Federation of City Farms and Gardens.

User: CFGN Community Food Growers Network

CFGN supports the following policy proposals drafted by Sustain/London Food Link:

As Sustain has highlighted in previous consultations, there needs to be **more recognition and link of the role that food growing and productive green space can have on physical and mental health**. In particular G8 needs to be reworded; whilst food growing is mentioned in a few places, it does not receive the coverage it deserves in regards to its current and potential role in delivering multiple benefits including:

- Healthy food, with lower greenhouse gas emissions
- Opportunities for connection with nature and activity promoting mental health
- Increased resilience through development of localised food systems
- Recreational and skills development
- Contribution to biodiversity

The current large number of Londoners involved and the multiple benefits that food growing projects have provided for the city deserves increased recognition and protection; without these spaces London would be a much less green and biodiverse city, as data continues to show from the Capital Growth programme, supported by the Mayor of London, London Food Strategy and previous London Plan.

We would like to see **more links made between the Greenbelt and potential for peri-urban agriculture, horticulture and orchard**s. We believe that a productive Greenbelt would be protected, rather than being left and therefore targeted for future development. Moreover, the application of organic and permaculture techniques for food growing could contribute significantly to biodiversity, soil retention, carbon sequestration and water management.

User: CFGN Community Food Growers Network

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User: CFGN Community Food Growers Network

Proposed changes to Policy G8 Food Growing, and supporting text

This draft policy on food growing does not go far enough to recognise the role and demand for community food growing outside of traditional allotments, which are already protected. We believe there is sufficient evidence of the many benefits of growing food, and evidence of the demand in London, which is one of the world's leading cities on urban agriculture, to justify greater commitment to protect and expand land for food growing**.**

As a result we are suggesting a rework of this policy as follows:

[redacted]

Policy G8	Amendments	Justification
New Point	**Add *'London's resources of land for agriculture, horticulture, orchards and private and community gardens should be protected, planned, designed and managed as integrated features of green infrastructure. In major development, the Mayor will require space for the cultivation of food.'***	**Consistent with other policies in the Green Infrastructure chapter, we feel that there should be a strong overview statement, including responsibilities for the Mayor to actively promote food growing in London. This would support implementation of the Mayor of London's London Food Strategy.**
A	In Development Plans, boroughs should:	
1)	Amend to say 'protect urban farms, existing allotments and other community food growing spaces, and encourage provision of space for community gardening, including for food growing and orchards within new developments.'	Community growing spaces typically have leases that give growers little longevity, rights or leverage to secure land, funding, resources and policy support; so our experience suggests that stronger language that supports them would be useful.
2)	Identify potential sites that could be used to increase local food production for London.	The Mayor and Boroughs should safeguard existing food growing spaces with high amenity value, producing food at scale, or on high grade agricultural land, particularly on the urban fringe.
3)	Ensure that land for community gardening and commercial food growing is developed in a manner that protects and enhances the soil, provides sustainable drainage and	

Policy G9 Geodiversity

User:	Mr Chris Gannaway

Think there is not enough strength in this policy we are loosing potential geodiversity sites to gravel extraction and landfill, if more pits were left showing the faces with the strata intact then we would have educational resourses

User:	London Forum of Amenity and Civic Societies

London Forum supports this policy.

User: London Geodiversity Partnership

I have consulted with members of the London Geodiversity Partnership (LGP) and these are the comments of the Partnership on the geodiversity aspects of the draft London Plan:

Comments on Policy G9 Geodiversity

In general there is an improvement on this section of the previous London Plan. Policy G9 is divided into two parts. On Development Plans, Part A, 1) and 2) are identical to the previous wording; do you see the previous reference to London's Foundations as superfluous in the policy. For development proposals, Part B says "where relevant" but this is unnecessary. In B 2), developments should also protect SSSIs.

In paragraph 8.9.2, when referring to SSSIs it should say "Interest" not "Importance" The paragraph states that "London's geodiversity Sites are shown in Figure 8.1". However, it says "National/Regional Geodiversity Importance" and the LGP would like SSSIs to be shown. (**Peter:** Does the map layer I sent you from Natural England work for you?)

As they are part of the Plan, LGP would like LIGS also to appear (with correct LF numbers) on figure 8.1.

On Figure 8.1, although it says the reference numbers come from SPG 2012, they bear no relation to London's Foundations. The numbering of sites in LF should be used. In the table below, I have tried to allocate the number given in figure 8.1 to show the problem.

I have tabulated the sites below, with the new sites 60-72 marked with red numbers. When we agreed the four-stage system, “Recommended” sites would be those agreed in the London Plan process. Therefore those up to GLA59 got though the previous LP process and are therefore all “Recommended”. Sites GLA60 to 72 will be “Candidate” sites if they go into this LP process and will become “Recommended” if agreed.

PLEASE SEE ATTACHMENT FOR TABLE THAT WAS INSERTED HERE*

I am not sure what paragraph 8.9.3 adds to this section as it is currently drafted. It should be elaborated as part of access to greenspace and how that enriches life, enhancing an understanding of natural heritage by the public visiting geological sites.

Paragraph 8.9.4 says access should be provided although not always desirable. It would be better to say: “… access for all should be provided to geodiversity sites, although it may be restricted for reasons of sensitivity or ownership of the site.”

As far as London’s Foundations is concerned, there is considerable updating that LGP would like to do so I propose we do this over the next six months and issue SPG for consultation in October. We shall proceed on that basis, unless you think otherwise. We meet on Tuesday, where we will agree a work programme.

I hope these comments will be taken into account and amendments made. Please contact me if you require any clarification.

Kind regards,

Laurie

Laurie Baker

Chair of Sites Working Group,

London Geodiversity Partnership

020 8850 0577

User:	Putney Society

Policy G9 - Geodiversity
We support this policy. Are boroughs taking this policy seriously?
Whilst these green policies are generally sound and deserving, we wonder whether the Mayor has the ability to secure compliance with the policies - given that so many decisions in these respects are taken by the boroughs with seldom any opportunity for the Mayor to become involved. How can the Mayor secure greater compliance by the London boroughs?

User:	London Borough of Islington

Draft London Plan Policy

Policy G9 – Geodiversity

Islington Response

The policy should clarify the process for boroughs to identify RIGs and LIGs, in particular any procedures and consultation required with relevant stakeholders.

User:	Association of Consultancy & Engineering

ACE welcomes the geodiversity policy but would add that geodiversity needs to be considered alongside water infrastructure, specifically Sustainable Urban Drainage Schemes (SUDS) when developments are being planned on top of London clay where permeation of water is not physically possible, especially if the water table is already high during winter months.

User:	London Assembly Labour Group

Suggested changes

Policy G9's requirement of boroughs to establish clear goals for the management of geodiversity sites to promote public access, appreciation and interpretation of geodiversity should also include the goal "to make a positive contribution to the protection and enhancement of geodiversity".

Justification for policy recommendations

We believe in the importance of biodiversity and want the plan to protect and enhance it.

User:	London Borough of Lewisham
We support G9 as we have a number of candidate RIGs and LRIGs in our borough that we will need to consider in the future.	

User:	Environment Agency
We welcome this policy. Refer to Natural England’s response.	

User:	London Borough of Bromley

The policy and the 6 recommended RIGS and 2 potential RIGS within Bromley (as previously identified in the London Plan 2016 are noted.

User:	London Borough of Tower Hamlets
Policy is supported	

User:	Royal Borough of Kingston
Support.	

User:	London Borough of Hillingdon

The policy adds little to existing framework on protecting geodiversity and should be deleted.

User:	London Borough of Hackney

Springfield Park in Hackney is designated as London’s only Geological Nature Reserve (since 1997). This policy, which seeks to protect geodiversity and promote public access, is supported.

User:	London Borough of Richmond Upon Thames

No comments.

User:	London Borough of Harrow
Statement under (A) (1) should also be included under G6.	

User:	The Wimbledon Society

G9A (& Si12): There should be specific Proposals and funding to clean up the dreadful standards of local rivers (eg Hogsmill River, Beverley Brook, River Wandle) and bring them back to nature and public access

User:	London Borough of Bexley

Figure 8.1 from Policy G9 Geodiversity identifies a ‘recommended RIGS’ (North End Pit) and a ‘potential RIGS’ (Chalky Dell) site in Bexley. Recognition should also be given within the London Plan to the Erith Submerged Forest as a potential RIGS. This is the best place on the Thames Estuary within Greater London for viewing the Neolithic/Bronze Age submerged forest. At low tides whole tree trunks are revealed amongst the root balls and occasional nuts and seeds can also be found. Peat beds are also found on the banks above mean high tide level. At least five different ages of peat and trees have been dated ranging from approximately 3,000 years ago to over 5,000 years ago.

User:	Association of Local Government Archaeological Officers (ALGAO)

There is an overlap between archaeology and geo-diversity but a lack of policy relating to such investigation. We suggest the addition of a sentence to the supporting text: “Prehistoric archaeological remains and associated flora and fauna can be found within geological deposits of the Quaternary Period which can therefore hold archaeological interest”.

User: London Wildlife Trust

We welcome and support Policy G9. In para 8.9.2 when referring to “Sites of Special Scientific **"Importance”**, this should say **“Interest”.**

We note that this policy is accompanied by the only map (fig 8.1) in the chapter, which as we referenced earlier for this chapter seems unbalanced. The map, for completion, should also include the SSSIs designated for geodiversity, as the title states “Sites of National/Regional Geodiversity Importance.”

In para 8.9.4 the commitment to access, which we support in principle, needs to be more explicit as to when it may not be appropriate, along the lines of:

Access for all should be encouraged to geodiversity sites, although restrictions may need to apply due to ownership or geological sensitivities of a site.

User:	London Property Alliance
Further strategic policy on this issue is not necessary.	

User:	London Borough of Sutton

SUPPORT. The London Borough of Sutton supports the broad approach to geodiversity conservation proposed throughout London.

User:	Blackheath Society

Policy G9 Geodiversity: We strongly support the protection of identified sites of special geodiversity interest, together with proposals to link these in trails with other green infrastructure. There are several such close to the Blackheath area.

User: London Borough of Ealing

Geodiversity
(G9 8.9.2)

It should read ‘Sites of Special Scientific Interest’ not ‘importance’.

Geodiversity
(G9 Figure 8.1)

The status of the identified sites is unclear from the naming in the key. Specifically it is unclear what the distinction is between ‘Recommended RIGS’, ‘Proposed RIGS’ and ‘Potential RIGS’. One site ‘Horsenden Hill’ is identified within Ealing (13), as a ‘Proposed RIGS’. This status appears to differ from that recorded in the London Foundations SPG where it is recorded as a ‘Recommended RIGS’. Moreover it should be noted this site was identified as a RIGS as part of our adopted Core Strategy in December 2013.

The reference numbering is curious as it does not reflect the number found in the London Foundations SPG (2012).

User: Natural England

Natural England strongly supports the inclusion of policy to protect London’s geodiversity. However, we note that the policy is functionally similar to policy 7.20 of the current London Plan (2016), with the exception that Boroughs are no longer required to investigate additional sites that may be of value in the local area and afford them the appropriate level of protection in LDFs.

We recommend that:

- This policy makes provisions for Boroughs to investigate additional sites to be afforded the protection of LDFs.
- This policy includes text to ensure that development proposals which may have a significant negative effect on SSSIs designated for geological interest be resisted.

User:	Historic England

We note the overlap between archaeology and geodiversity

We suggest the following addition to the supporting text:

‘Prehistoric archaeological remains and associated flora and fauna can be found within geological deposits of the Quaternary Period which can therefore hold archaeological interest.’

Policy GG1 Building strong and inclusive communities

User:	Hackbridge & Beddington Corner Neighbourhood Development Group
Paragraph 1.1.1 should read ‘Planning for Good Growth means planning **WITH** these communities – both existing and new …’ not ‘**for** these communities’.	

User:	Hackbridge & Beddington Corner Neighbourhood Development Group

We agree with paragraph 1.1.5 and how it is important to have early engagement with local residents as their experience and knowledge is important to shape any future plans for specific areas.

User: Matthew Robinson

1: MEANINGFUL PUBLIC PARTICIPATION

There is no mention of public participation in the planning system in the London Plan policy boxes. Currently public participation is often top down and too late in the planning process. As noted in 1.1.5. there is a need for public participation early in the planning process.

Those involved in planning and development must seek to inform and empower communities to participate in planning processes. This must be done meaningfully from the beginning of these processes. We suggest an additional policy in GG1 and support Just Space's (in Towards a Community Led Plan for London: Policy directions and proposals) call for:

G)

- **The mayor to enter into a Social Compact with Londoners agreeing to a programme of effective, meaningful and continuous engagement that enables all Londoners to work with the Mayor and officers in a spirit of cooperation and in coproduction of the new London Plan and its related strategies.**
- **Develop a Mayor's Statement of Community Involvement, which will provide a formal framework for developing, implementing and reviewing effective and inclusive community participation**
- **Provide resources to facilitate the informed involvement of communities and user groups to include training, learning and technical advice as well as administrative support, to enable more people to have influence over the development of their areas.**

This is supported by amongst other things the Aarhus Convention and a Supreme Court ruling in 2014 confirming the 'Sedley' or 'Gunning' principles.

User:	St Anne's Redevelopment Trust

- We agree with the importance attached to building strong mixed and inclusive communities (1.1.4) and Policy GG1 which seeks to address social isolation.

User: London national Park City Foundation

Building strong and inclusive communities – Policy GG1, Page 13

LNPCF supports Policy GG1 to:

B - Provide access to good quality services and amenities that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation.

C - Ensure that streets and public spaces are planned for people to move around and spend time in comfort and safety, creating places where everyone is welcome, which foster a sense of belonging and community ownership, and where communities can develop and flourish.

D - Promote the crucial role town centres have in the social, civic, cultural and economic lives of Londoners, and plan for places that provide important opportunities for face-to-face contact and social interaction during the daytime, evening and night time.

E - Ensure that new buildings and the spaces they create are designed to reinforce or enhance the legibility, permeability, and inclusivity of neighbourhoods, and are resilient and adaptable to changing community requirements.

User: Mama Ujuaje

The Food heritage of London is rooted within its deepest past - but in what way is this fact acknowledged in terms of how the planning of its built environment is spoken of and designed?

Engagement with food is a basic activity of all Londoners and the diversity of this engagement is embodied in the variety of food system practices Londoners engage in; from the curried eel and mash shop to the haute cuisine Latin American offerings of Soho, from the occasional herbal supplement trader to Fortnum and Mason's food counters. Some few may keep goats for milk and others grow lettuces underground, to cater for the salad eaters of the city. The range in London food cultures derives from often turbulent histories which also relate to the detailed designs of London architecture, the characters of the town centres and the ways in which decisions are made about London's spaces, writ small as well as in how opportunity areas are configured, so writ large.

Markets ancient and modern have defined the central layout of London, the need to access local breweries, and a good supply of milk, meat and bread for the nobility have shaped the spaces which we take for granted in the West End and in the City, the plantation investments of distant shores defined the location of gentlemen's clubs, coffee houses, hotels, inns and trading places. The internal docklands have received the bounties plundered by City exploits bringing in tobacco, sugar, cotton and chocolate and wholesale markets have grown up around the associated businesses. Even the educational institutions which were built for the elite to learn how best to extract from and protect British territories abroad, which largely consisted of plantation economies or natural resource extraction operations form part of the capital's current heritage and culture today.

Knowing this, it is not possible to think of the spatial planning of London, with respect to heritage and culture, without factoring in the heritage and culture of the city's food and the diverse populations who have made parts of London their own and conferred unique cultures of trade, music, arts and ways of relating with each other, unique to them and shaping the way in which a place is understood, not only by its longer term citizenry, but also by those who have moved in, in waves of new settlements across London, with varying degrees of intensity.

It is therefore quite disingenuous to speak of the historic culture and heritage of London without referring to these things, yet this is what this chapter has done. It sets the tone for a 'development' of London which ignores the culture of its current citizens and treats history, the idea of heritage and the sense of culture almost as boxed artefacts to be handled as one might preserve or conserve an archive, an artefact, a history that is now dead and past, not as the living culture and heritage that continues this London tradition of constant change and stable traditions, diversity and constancy, a creative interplay of identities: ethnicity/race, class, creed, belief and more.

In responding to this, food growing networks have the opportunity to seek to insert into this chapter how the heritage and culture of London ought to recognise food growing traditions, however modern or however ancient; those associated with local knowledge and those knowledges from shores a great distance away and seek to preserve them and their benefits they bring to the practice

of growing as well as to the diverse communities of London. It might also argue that heritage and culture are concepts that are ongoing, rather than static and so should be embraced by policies and plans pertaining to London which make use of reconsidered changes to the land and natural resources of the city, in light of new understandings of the environment and food growing practice, such as that referred to as agroecology, which promises a positive renewal and adaptation of food growing in the context of human land use.

The use of the term heritage and culture might also be referred to by London's food growing networks as needing to include and refer to London's food heritage (which is diverse) and understanding that much of London's current popular 'culture' revolves around food, its sourcing: local, its marketing: specialist, local farmer and 'fresh' and its consumption: specialist 'foodie'.

What this approach ignores, however, is the food culture of the lower and working classes, children and the elderly, disabled, ethnic minorities and homeless.

Food is arguably a more important factor in the well-being of this part of London's citizens than for others. A greater proportion of the income of the poor is spent on food than on any other basic household need.
https://www.ons.gov.uk/peoplepopulationandcommunity/personalandhouseholdfinances/expenditure/bulletins/familyspendingintheuk/financialyearendingmarch2016

https://www.kelloggs.co.uk/content/dam/europe/kelloggs_gb/pdf/R3_Facts%20about%20Food%20Poverty%20ReportFINAL.pdf

What kind of culture exists and continues to emerge in relation to these groups and how able have food growing networks been in responding to these cultures and their food system demands or needs and how do such networks visualise any spatial planning to enable a more full response to this sector of London's humanity to be better met by a plan for London.

However, given that the plan is considering all of London's structures: housing, transport, green infrastructure, etc., each of which interfaces with different aspects of the food systems of London, (which are, in themselves, connected to the food systems of the nation and indeed the globe), London's Food Networks will need to ensure that its responses reflect the current realities of how different types of Londoners interface with the food systems held within London cultures and researches and understands the factors which drive their development (or demise).

What, for example, is the response of food growing networks to the proposed closure of chicken shops and the narrative discourse around this policy move? Are they looking at the entire food system in which chicken shops sit: the supply chains, the alternative employment possibilities, the impact on where the ‘school pound’ is spent alternatively, the local economies, etc.? What might be the social impact assessment of a called for closure of chicken shops in a locality, especially one which involved the communities and other private/corporate agencies which are engaged in the food supply system for school children in the locality.

The awareness and pro-activity of a food growing advocacy network in holding this complexity is limited to how it frames its own work and the level of partnership it undertakes to foster with the range of institutions which represent other aspects of the food systems which feed all of diverse London.

2

3
So let us look at the specific policies under the London Plan Draft chapter on Heritage and Culture to
see what might stand out for editing.

Firstly, what is the Good Growth framework policy that it sits in?
From GG1 policy D

promote the crucial role town centres have in the social, civic, cultural and economic lives of Londoners, and plan for places that provide important opportunities for face-to-face contact and social interaction during the daytime, evening and night time.

And a suggested addition to GG2:

G. That, mindful of the need to optimise the use of space, intensification planning at borough level ensures there is sufficient social impact assessment to ensure changing land uses do not impact adversely those whose claims on the land have been hitherto less well represented. Furthermore no new land use should have the effect of displacing heritages and cultures that are part of what is widely recognised as giving London its special character as a ‘world city’.

And From GG5 policy F

promote and support London’s rich heritage and cultural assets, and its role as a 24-hour city.
We can bear these in mind when considering the H&C policy recommendations:

User: Ms Siobhan Mooney

#1 Help produce a shift in thinking so that access to and the value of community spaces is not based on business plans and income generation but on the social value of the community space and its contribution to health and wellbeing, inclusion, integration, empowerment and poverty reduction.

#2 Recognising the irreplaceability and uniqueness of many community spaces and looking after them for future generations is part of a continuing legacy.

#3 Valuing and resourcing community-centred knowledge and creativity for the contribution this can make to policy discussions and a whole system approach to community engagement across the GLA.

#4 Community spaces are not just physical buildings, but social spaces where cultural expression takes place. These social spaces provide movement and interaction between different cultures and it is important they are integrated as well as truly accessible to all.

#5 Community spaces are essential to the achievement of lifetime neighbourhoods in which housing, health and education facilities, shops and other local amenities are affordable and accessible to everyone, now and for future generations, and there is support for community networks based on social co-operation and mutual aid.

#6 Housing estates provide a wide range of community spaces – community halls, open spaces, playgrounds and other facilities – which must be protected and their use encouraged.

User:	Sam Brightbart

In a nutshell, too much focus in income generation, not nearly enough on all the myriad other elements that make communities strong and happy. Community spaces have a value beyond the pecuniary.

Policy GG2 Making the best use of land

User: British Property Federation

We are encouraged by the Mayor's commitment to creating high-density mixed-use places that make the best use of land. The policy's emphasis on the need to prioritise the development of opportunity areas and brownfield land as well as maximise the potential of sites around transport hubs and in town centres is also welcome. However, we believe this policy could go further still and have previously called for the establishment of 'station development zones' to ensure intensification is undertaken in an appropriate manner.

If London is to meet its requirements for housing at the rate required, there is a need for a land use strategy that embraces all possible sources of land. Whilst the draft plan recognises the need to explore the use of public land to support additional homes, there is no reference to the 'Domesday Book' of public land identified by the London Land Commission. We would encourage the Mayor to set out a clearer policy framework which will enable this surplus public land to be brought forward for development sooner.

We will provide more detail on this point in subsequent sections as well as set out our position on the Green Belt in our response to Chapter 7 G2.

User: Watkin Jones Group

Policy GG2 Making the Best Use of Land

The aims of providing high density mixed use developments are supported by the Watkin Jones Group. The requirement to prioritise the development of opportunity areas, brownfield land, surplus public sector land, sites which are well-connected by existing or planned Tube and rail stations, sites within and on the edge of town centres, and small sites is supported as it makes absolute sense.

Furthermore, support is given to exploring the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling. Support is also given to the potential promotion of car-free lifestyles to assist with promoting an efficient use of land, as well as utilising new and enhanced public transport links to unlock growth.

User:	Business for London

“Best use of land”. The concept of “making the best use of land”, is put forward as an overarching objective. This supersedes previous requirements to “maximise” or “optimise” the use of land, and is likely to cause plenty of debate about what constitutes the ‘best’ use of land. Given the state of the current property market, and the imperative to provide more housing, the inevitable pressure will tend to favour housing, at the expense of employment creating developments and existing employment areas.

User:	Brethren's Gospel Trusts

COMMENT – Whilst we recognise the need to make the best use of land through prioritising the development of Opportunity Areas and transport nodes as well as town centre sites, the Plan should also recognise the needs of families for suitable housing with gardens and access to open space rather than over reliance on high rise estates. Furthermore, although many infrastructure assets are suited to multiple uses, this is not always appropriate for places of worship which are often dedicated for the single purpose. The prospect of sharing premises with other faith groups is often neither practical nor consistent with their theological beliefs – see ‘Faith Groups and the Planning System’:

[Footnote: Faith Groups and the Planning System : AHRC Faith and Place network: October 2015 (paragraph 6). See Appendix 1.]

User: London Wildlife Trust

We welcome and support Policy GG2 and the commitments to protect existing nature conservation sites, as well as Green Belt and MOL. However, we recommend that an overall commitment to securing net gain for biodiversity in line with the NPPF's aim to "achieving net gains for nature"4 is explicitly embedded in this policy and that the focus of brownfield land needs to follow NPPF's recognition of the high environmental value of some brownfield land.5

5 NPPF, paragraph 111: Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value.

User:	London Wildlife Trust

We recommend amending Part D to

D Protect London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening **in order to secure net biodiversity gains.**

User:	London Wildlife Trust

Paragraphs 1.2.1 to 1.2.8 make no reference to the multiple non-human populations we share our city with, and the likely impacts of under-planned growth.

User:	London Wildlife Trust

1.2.6 As London develops, the Mayor’s Good Growth by Design programme – which seeks to promote and deliver a better, more inclusive form of growth on behalf of all Londoners – will ensure that homes and other developments are of high quality. Existing green space designations will remain strong to protect the environment, and improvements to green infrastructure, biodiversity and other environmental factors, delivering 50 per cent green cover **and net biodiversity gain** across London, will be important to help London become a National Park City.

User:	Apex Airspace Development

Apex Airspace believe that there is significant untapped development potential across the capital atop its existing buildings. By being able to create asset value from roof top space you reduce the need to encroach on the supply of new land

User:	Apex Airspace Development

T*he key to achieving this will be taking a rounded approach to the way neighbourhoods operate, making them work not only more space-efficiently, but also better for the people who use them. This will mean creating places of higher density in appropriate locations to get more out of limited land, encouraging a mix of land uses*

Airspace developments can play an important part in delivering this proposal. By being able to increase density whilst diversifying the existing stock to create new mixed use development in areas where people want to live across the capital

User: Apex Airspace Development

The benefits of this approach are wide-ranging, going well beyond the simple ability to provide more homes and jobs. High-density, mixed-use places support the clustering effect of businesses known as 'agglomeration', maximising job opportunities. They provide a critical mass of people to support the investment required to build the schools, health services and public transport infrastructure that neighbourhoods need to work.

We agree that the 'agglomeration' effect of clustering effect of business is critical to the local amenities and communities of Londoners, by intensifying the density of the suburbs these businesses can be supported and encouraged to thrive, in using our model no land needs to be lost to this increase of density. This allows the status of the critical mass of people being retained over time by injecting new homes in areas that already have established amenities and a social structure for people in any demographic to live a healthy life.

We welcome the Mayors plan to proactively explore the potential to intensify the use of land, by promoting higher density development. We particularly agree with the targeting of sites that are well connected by means of different transport hubs.

We are also hugely in favour of maximising opportunities to use infrastructure assets for more than one purpose, by using our model we can help explore the many efficiencies that can be made, such as reducing maintenance costs and increasing asset value.

User: Uttlesford District Council

Furthermore, the SHLAA explains that estimates of development potential are based upon use of the density matrix in the adopted London Plan, with estimates based on the top of the density range for town centres and higher assumptions applied in opportunity areas reflecting recent trends. This represents a disconnect with the draft London Plan, which no longer includes a density matrix and instead, at Policy GG2 (Making the Best Use of Land), requires a design-led approach to be taken when exploring the potential of land, understanding the character of different places. This is further expanded upon in Policy D1 (London's Form and Characteristics), Policy D2 (Delivering Good Design), and Policy D6 (Optimising Housing Density). In particular, these require a design-led approach that 'optimises' development potential. To optimise development density is a fundamentally different concept to maximising development density, reflecting what is right and appropriate for an area. It is considered inconsistent that the draft London Plan relies on evidence that is based upon an approach that is not reflective of its own policies. Rather, the estimates of potential in the SHLAA should be based upon a design-led approach as required by Policies D2 and D6. This is emphasised by evidence to the draft London Plan[1] which suggests that use of the density matrix 'may result in inappropriate development in certain places'[2].

[1] GLA Density Paper 4, Exploring Character and Development Density

[2] ibid. Section

User:	The Housing Forum Limited

Even with a focus on brownfield development, delivering the new targets will be challenging without some consideration of green belt land. The outer London boroughs are looking at some greenbelt development, including around new transport links, such as the Elizabeth Line. Some designated green belt land is of poor environmental quality and could be successfully redeveloped for housing without the loss of amenity.

User: Mr Terry Wilden

Comment

We generally support this policy, but under Point D, there should also be a specific reference to protection of private residential gardens.

Policy 3.5 in the EXISTING London Plan states that:

“Boroughs may introduce a presumption against development on back gardens or other private residential gardens where this can be locally justified.”

If this policy is not retained in the New London Plan in some form it will mean that all the London Boroughs that have adopted and statutory policies to protect residential back gardens will no longer be in accordance with, and in general conformity with, the New London Plan.

In response to questions at the consultation event in Merton on 9/1/2018, the Deputy Mayor, Jules Pipe, said the New London Plan is “not a charter to build on residential back gardens” and “the Mayor is not interested in people building on back gardens.”

The Small Sites policy in the Housing Chapter contradicts this statement.

Suggested Amendment

Policy GG2 (D)

“Protect London’s open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local green spaces, including private residential gardens, and promote the creation of new green infrastructure and urban greening.”

Reason

In order to avoid the return of speculative back garden development (garden grabbing), which is inevitable if some protection is not given to private residential gardens.

Back gardens play an important role in quality of life and biodiversity in London. Allowing more ‘garden grabbing’ could create long term damage to our environment and be inconsistent with the Mayor’s ambition for London to become the World’s first National Park City.

The absence of reference to private residential gardens here is also inconsistent with the proposed policy G1 (a).

User: New West End Company

Growth-limiting issues - A shortage of commercial workspace

6.6 While we appreciate the direction in policy GG2 which seeks, within the CAZ, to “proactively explore the potential to intensify the use of land” and “promote higher density development” we do not believe that this gives sufficiently detailed guidance given the scale of development required to meet the jobs growth targets of the WEP and to maximise the economic benefits of the Elizabeth Line.

6.7 The Mayor and WCC have set ambitious growth targets for Westminster. In its consultation paper “Building Height” Westminster City Council states that “being at the heart of a world city there is no room for a ‘no growth’ option”. The council continues “we have to find an additional two million square metres of business floorspace to accommodate an additional 77,000 jobs and to make up for the significant amount of office space we have lost to housing since 2005”.20

6.8 The West End Partnership supports this when it says “The Partnership is committed to ensuring that local people and all Londoners are able to see and access the benefits of greater prosperity and better life opportunities that a thriving and growing West End will offer. For example, there is a projected growth in jobs of 77,000 in Westminster by 2036”.21

6.9 The Partnership’s Vision proposes that “more space for employment and expanding businesses will be provided” and adds that “higher levels of economic growth in both the core West End and in its fringes will be matched by the sustainable and balanced creation of new capacity, in terms both of accommodation and city management.”22 The Partnership notes “Its (the West End’s) property stock faces a near-zero void rate soon, creating a shortage of commercial space for a huge number of small and medium sized firms that have traditionally started life here”.23

6.10 The Partnerships Vision 2030 further stresses the need for additional commercial space saying “ It is estimated that Westminster will need to host thousands of new jobs every year over the next 20 years just to maintain its share of London’s employment market, given the forecast growth in population…..The necessary growth in floor space to meet these jobs targets will be required over the next 20 years……Changes to the West End’s density, massing and form will have to be considered, on the basis that the interests of both residents and the needs of businesses can be met. It must enhance the West End, not detract from it”.24

6.11 In 2016/17 three reports were commissioned (by New West End Company and Westminster Property Association) to determine what level of additional commercial space would be required to accommodate the proposed jobs growth target25. The first concluded that to house the full 77,000 a total of 1.9 million sqm of new commercial accommodation would be required. The second showed that to accommodate 30,000 jobs in the Oxford Street district (around 40% of the total) 750,000 sqm of net new commercial space would be required. The findings of the two are consistent. The third estimated how much of this required extra commercial space could have been met if recent and current developments across the Oxford Street district had been allowed a modest increase in density and concluded they would have been able to provide 10% of the total additional floorspace required over the next 15 years. An overview of the three reports is given below and the full reports are available from New West End Company.

6.12 Westminster Property Association commissioned research from Volterra into the amount of commercial floor space required to meet growth targets. The analysis takes into account the office floorspace losses of the last decade and approved developments. It concluded that Westminster would require at least 1.9 million sqm of new commercial floor space to accommodate its jobs target over the next 20 years. To put this into perspective, this is three times the amount of commercial floorspace delivered over the past 20 years.26

6.13 New West End Company commissioned research from Volterra and Gerald Eve to determine the amount of new commercial floorspace required to accommodate an additional 30,000 new jobs in Oxford Street over 15 years as the district's contribution to the West End Partnership's jobs growth targets (39% of the total). Three different floorspace scenarios were considered dependent on how these additional jobs are delivered and how much new floorspace is required to deliver them. The results show that up to 750,000 sqm of new office space could be required to meet these job creation targets. The full study is available from New West End Company.

6.14 The study also showed that WCC and The Mayor could accrue planning payments of up to £206 million over that 15 year period and additional business rate income of up to £160 million annually if permission to deliver the maximum commercial space required to meet its job targets was granted.

6.15 Gerald Eve was also asked to examine major development schemes across the Oxford Street district either being determined, permitted or under construction (but not yet occupied), as a sample of the historic pipeline, to consider the extent to which they could have contributed to meeting these employment targets.

6.16 The study looked at these schemes in terms of the floorspace uplift and contribution towards policy objectives in terms of jobs, homes and CIL/business rates. They then undertook a separate assessment based upon a more positive policy framework in terms of both building and employment growth and more flexible mixed-use policies for the district.

6.17 This sample confirms that a reasonably modest increase in these existing schemes alone would have delivered around 84,000sqm GEA of additional office floor area. This would have supplied over 10% of the new floorspace that may be needed over the next 15 years. This space could have accommodated around 8,000 new jobs, potentially adding up to £600m to the City of Westminster's annual GVA.

6.18 This sample would have, additionally, contributed £16.5m to Westminster's CIL receipts and a further £11.7m of Mayoral CIL / Crossrail payments. Gerald Eve's ratings analysis suggests this more ambitious approach to the sample of schemes reviewed could have secured an additional business rates take of £480m over a 20 year period.

6.19 The West End clearly needs additional commercial space to be created and there would be great economic and financial benefits to both businesses and the public sector in providing it. To meet the challenge of providing sufficient new commercial accommodation New West End Company believes that planning policy should;
? ensure that local planning authorities provide sufficient commercial space to accommodate agreed job growth targets. In particular policy GG2 which states that local planning authorities should "proactively explore the potential to intensify the use of land27" and "promote higher density development28" should be amended to " promote higher density development, sufficient to allow for the provision of the commercial space required to accommodate the jobs growth targets set for each borough"
? continue with the current mixed-use policy to enable the maximum area of new commercial space to be created in the International Shopping Centre without having to provide a housing element (which is, we believe, an inappropriate use given the operation requirements of an International Shopping Centre)
? relax the restrictions on the height of development in the CAZ. WCC is currently consulting upon appropriate locations for bigger and higher buildings and roof level extensions to meet growth targets. The Oxford Street district is ideally located for bigger and higher buildings given the exceptional public transport accessibility, scale of existing buildings and streets and significant potential for place-making.
? consider other changes to local planning policy, such as rights of light, which would facilitate greater commercial development.

6.20 Without these policy considerations we do not believe that The Mayor and WCC will be able to meet its jobs growth targets, to the detriment of the economy and future business rate income for London government. We are not convinced that policies to “proactively explore the potential to intensify the use of land”, to “promote higher density development”, and to “support the vitality and viability of the International Shopping Centres” give sufficient guidance to the levels of development required to meet the ambitious jobs and Economic growth targets for the West End.

19 The West End – Vision 2030 P5 https://westendpartnership.london/wp-content/uploads/2017/10/wep_vision_2030.pdf

20 “Building Height: getting the right kind of growth for Westminster” March 2017

21 The West End. Vision 2030
22 The West End Vision 2030 page 12
23 The Case for the West End August 2016 page 4
24 The West End Vision 20130 page 12
25 Theses studies are available from New West End Compamy
26 Volterra “Note on Westminster employment and floorspace”

27 Policy GG2
28 Policy GG2

User:	Canal & River Trust

Policy GG2 states that those involved in planning and development must ‘understand what is valued about existing places and use this as a catalyst for growth and place-making, strengthening London’s distinct and varied character’.

The Trust welcomes this policy requirement. We suggest that a number of the amendments that we have proposed below will help to ensure that waterways are considered as part of this.

User:	London Environment Directors' Network (LEDNet)

Policy GG2 Making the best use of land

B Proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density **development that integrates green infrastructure**, particularly on sites that are well-connected by public transport, walking and cycling, applying a design–led approach.

User: 313-349 Ilderton Road LLP

Policy GG2 Making the best use of land sets out criteria to create high-density, mixed-use places that make the best use of land.
We support the priority given to the development of sustainable locations particularly in respect of Opportunity Areas. We also support the potential to intensify the use of land through higher density developments. However, in light of the draft increase in objectively assessed housing need in London, the protection afforded to Green Belt and Metropolitan Open Land significantly restricts the delivery of housing at the required rate. The Travel in London Report 10 prepared by TfL states that sustainable travel has increased from 52.0 per cent in 2000 to 62.1 per cent in 2016. Although this demonstrates that the trends in travel over the past decade or so have had the effect of progressively increasing the share for active, efficient and sustainable transport modes, it is contingent upon significant investment in relevant infrastructure. This is particularly prevalent in the outer Boroughs which accounts for the majority of trips in London, and whereby typically just over 50 per cent of journeys made are using sustainable modes. Intensification of the use of land through higher-density development can facilitate infrastructure improvement. Further, this places greater emphasis for higher densities in areas with existing or committed infrastructure improvements.

User: Moorfields Eye Hospital NHS Foundation Trust & UCT Institute of Opthalmology

Policy GG2 Making the best use of land prioritises the development of opportunity areas, brownfield land, surplus public sector land, sites which are well-connected by existing or planned tube and rail stations, sites within and on the edge of town centres, and small sites.

Development should *"proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling, applying a design–led approach."*

Those involved in planning and development must *"Understand what is valued about existing places and use this as a catalyst for growth and place-making, strengthening London's distinct and varied character."*

We welcome and support this policy. The City Road island site is not surplus public sector land and is required to facilitate the development of a future facility, ideally at St Pancras. The City Road Island site is significantly under developed given its highly accessible and central location. Further, it is a brownfield site adjacent to the City Fringe Opportunity Area.

In addition, the preferred St Pancras site will become surplus to the requirements of the Camden and Islington NHS Foundation Trust once healthcare service changes and re-locations have taken place from that site.

User: Crest Nicholson PLC

We consider this Policy to be unsound as currently drafted and amendments are required.

Policy GG2 Part D
Crest Nicholson's representations to Policies G2 and G4 should be read alongside this Policy GG2 Part D. We consider our representations to Policies G2 and G4 are consistent with the wording in Part D of Policy GG2 and clarify how the Draft London Plan will proceed as regards dealing with its designations of Green Belt and Metropolitan Open Land and providing suggestion as to how to achieve the urban greening and access to more green space by the public that the Mayor is seeking to achieve. However, the inter-relationship between Parts A to F of Policy GG2 should be considered further as Part D could impact on the success of achieving the objectives set out in the other Parts of this Policy.

We concur with the HBF's representations and proposed recommendation to re-word the policy along the following lines:

"To create high-density, mixed-use places that make the best use of land, those involved in planning and development ~~must~~ should aim as far as possible, and consistent with the principle of sustainable development:

A…(as drafted)
B…(as drafted)
C…(as drafted)
E…(as drafted)
F…(as drafted)

In pursuing these objectives plan-makers should avoid significant adverse impacts on any of the dimensions of sustainable development."

The last sentence is lifted from paragraph 152 of the NPPF. It is a reminder that one needs to consider the 'sustainable development' in the round, and that local planning authorities might be better placed to decide what represents the most appropriate balance for their area. This might mean the release of Green Belt land to accommodate development needs in order to avoid more adverse impacts on the social, economic and environmental aspects of sustainable development.

User: Catalyst Housing Limited

The supporting text to draft Policy GG2 refers to delivering 50% green cover across London through, amongst other things, improvements to green infrastructure (also set out at paragraph 8.4.3 to draft Policy G4, which takes it a bit further and refers to 'more than' 50% by 2050).

It is not clear from the draft Plan or the accompanying evidence base what the current percentage of green cover is across London. As such it is not clear what level of uplift is sought through improvements, and it is therefore impossible to test whether this is realistic. We are concerned that it may not be possible to achieve a total of 50% through (say) housing developments, particularly given the range of requirements proposed to be imposed on development elsewhere within the Plan. Although we acknowledge this is not policy, the percentage should nevertheless be treated flexibly. This would have the advantage of providing critical flexibility to enable other requirements of the Plan to be satisfied, and we do not think this would compromise the green cover principles sought by the Mayor.

User: CBRE Global Investing

Policy GG2 states that to create high-density, mixed-use places that make the best use of land, those involved in planning and development must:

a) Prioritise the development of Opportunity Areas, brownfield land, surplus public-sector land, sites which are well-connected by existing or planned Tube and rail stations, sites within and on the edge of town centres, and small sites.
b) Proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling, applying a design–led approach.
c) Understand what is valued about existing places and use this as a catalyst for growth and place-making, strengthening London's distinct and varied character.
d) Protect London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening.

CBRE Global Investors supports the provision of high density mixed-use development in Opportunity Areas, on brownfield land and on well-connected sites. It is considered that these are the locations in which housing must be concentrated and maximised. In particular, CBRE Global Investors represents and has interests in a number of sites within Opportunity Areas. As such, they wish to support significant growth within Opportunity Areas, and would like to work with Boroughs and the GLA to deliver proactive and deliverable planning solutions.

User:	Benhill Residents

(A) We object to the ongoing sell-off of public land for market housing development. This is not the best use of land. Public land should be protected to deliver homes for which there is the greatest need, particularly, the backlog of need for social-rented homes.

(B) There is absolutely no evidence that Opportunity Area development is meeting existing need. Grass roots evidence would suggest that these areas simply provide ‘opportunities’ for developers and need at the high end of London’s communities pretty much to the exclusion of lower income households.

(c) How do ordinary working class, lower income households, get to express what is of value to them? How are they to be heard? In most instances lower income households don’t engage in development of planning policy – because the language is too technical and there is an absence of funded support to facilitate their active engagement. When faced with more educated professionals and developers many feel they have an uneven chance to influence.

User: The Royal Society for the Protection of Birds (RSPB)

This policy sets out the areas which should be prioritised for development including Opportunity Areas, brownfield land and surplus public sector land (See: Section A policy GG2 Making the best use of land). Paragraph 111. of the NPPF is clear that planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land) **provided it is not of high environmental value**.

The Mayor should **commit to providing guidance on when a brownfield site should be considered of high environmental value**. All brownfield sites being considered for development should be **supported by an up to date ecological survey and assessment**. This is essential to ensure that brownfield sites of value to wildlife and providing the public with access to nature are not lost to or damaged by development. Such sites are likely to be under increased development pressure in London.

User: Elaine Chambers

Policy GG2

(A) We object to the ongoing sell-off of public land for market housing development. This is not the best use of land. Public land should be protected to deliver homes for which there is the greatest need, particularly, the backlog of need for social-rented homes.

(B) There is absolutely no evidence that Opportunity Area development is meeting existing need. Grass roots evidence would suggest that these areas simply provide ‘opportunities’ for developers and need at the high end of London’s communities pretty much to the exclusion of lower income households.

(c) How do ordinary working class, lower income households, get to express what is of value to them? How are they to be heard? In most instances lower income households don’t engage in development of planning policy – because the language is too technical and there is an absence of funded support to facilitate their active engagement. When faced with more educated professionals and developers many feel they have an uneven chance to influence.

User: Royal London

Policy GG2 – Making the best use of land

Royal London welcome the key intent of this policy to promote the densification and prioritise the development of Opportunity Areas (OA's), brownfield land and surplus public-sector land.

The delivery of new and improved infrastructure to and within these areas to create the context and market conditions to support and facilitate development is key. We would emphasise the importance and responsibility of the GLA and its partners in ensuring the delivery of this identified infrastructure to enable and optimise development potential. An example this would be the importance of the delivery of the Bakerloo Line Extension into the Old Kent Road Opportunity Area which will facilitate the development of RLs assets in these areas. Funding for this needs to be resolved at a strategic, national and regional level with the GLA having the lead responsibility to achieve this.

RL notes and welcomes the clarification within the Draft Plan that a design led approach to intensifying the use of land should be followed. However, RL would stress and strongly recommend that the GLA provides clarification in their approach that a design led approach does not simply mean just following the surrounding scale, heights and massing of building heights but also thinking about the future and emerging potential and context of an area. The identified growth needs of London as clearly set out in the Draft Plan should be an essential, explicit and legitimate consideration in assessing proposals which seek to intensify the use of land to avoid 'more of the same' proposals and local level decision making which fail to optimise the use of sites. We would also recommend on this theme that there is an explicit recognition within this policy that sites of significant scale often provide an opportunity to provide definition, character and context to an area themselves and these sites certainly should not be undermined by a cautious approach and application of a design led approach to planning.

User: Reigate and Banstead Borough Council

Policy GG2 - Making the Best Use of Land - is generally supported in particular with reference to co-ordination with areas beyond the borough boundary. Recognition and support for a more sustainable pattern of development and a greater recognition of a more polycentric geography for London is welcomed as a policy which has been tried and worked in London before (GLDP) but has been neglected more recently to the disadvantage of areas in outer London. Residents from Banstead and other northern areas of the borough to make use such areas for work, shopping etc. and Good Growth, that achieves a reduction in the distances travelled and in the need for travel, is welcomed as also meeting environmental objectives.

Good Growth is of benefit to the wider area. The council supports the proposition that the cost and environmental impact of unnecessary extra travel across the London boundary, created by a failure of London’s housing policies and the provision of sufficient housing of the right type and affordability within London is Bad growth. This adversely affects the people and the environment of Reigate and Banstead Borough.

User: Earls Court Public Sector Tenants' Assoc

(A) We object to the ongoing sell-off of public land for market housing development. This is not the best use of land. Public land should be protected to deliver homes for which there is the greatest need, particularly, the backlog of need for social-rented homes.

(B) There is absolutely no evidence that Opportunity Area development is meeting existing need. Grass roots evidence would suggest that these areas simply provide ‘opportunities’ for developers and need at the high end of London’s communities pretty much to the exclusion of lower income households.

(c) How do ordinary working class, lower income households, get to express what is of value to them? How are they to be heard? In most instances lower income households don’t engage in development of planning policy – because the language is too technical and there is an absence of funded support to facilitate their active engagement. When faced with more educated professionals and developers many feel they have an uneven chance to influence.

User: Living Streets

We support policy GG2 and strongly support 1.2.3 “They are places where local amenities are within walking and cycling distance, and public transport options are available for longer trips, supporting good health, allowing strong communities to develop, and boosting the success of local businesses”.

Encouraging intensification of density and not sprawl helps create walkable neighbourhoods where more journeys, and stages of journeys, are possible on foot.

We also strongly support “E. plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock growth”.

User:	Orbit

Orbit supports the principle of the policy, but it needs to acknowledge that for sites within Outer London which are not located within close proximity to main transport hubs and have poor PTAL ratings, it may be more difficult to intensify the use of the land for housing as these sites are not supported by adequate transport connections.

User: Lands Improvement Holdings

Policy GG2 - Making the best use of land

Policy GG2 is too restrictive to meet the needs of Londoners and should be expanded to include further options for making the best use of land.

This should include a review of the Green Belt to identify land adjoining existing urban areas that does not make a positive contribution to the Green Belt or nearby communities. Where such sites are well-connected by existing or planned public transport, opportunities to make better use of these limited areas of Green Belt should be explored.

Without a Green Belt review, or provisions in place to review Green Belt boundaries through subsequent borough level Local Plans, it is not possible to conclude that the proposed London Plan is sound and NPPF compliant. Planning to not meet London's housing needs, without first considering the potential role of the Green Belt is irrational. The draft London Plan does not represent justified and positive planning to identify the most appropriate strategy for meeting London's housing needs having regard to the overall sustainability balancing act.

The Green Belt makes up over one fifth (22%) of all land in London that is potentially available to help meet housing needs. Ruling out the Green Belt at the outset (now or through subsequent borough Local Plans) prejudges the whole plan making process, especially when development needs are not proposed to be met (including market and affordable housing). It discounts other reasonable alternatives and implies that every acre of the Green Belt, drawn up over 80 years ago, is sacrosanct and cannot be sustainably developed (alongside other sources of land) to help house Londoners.

Across London there are examples of Green Belt land that adjoins existing development and does not serve the NPPF purposes, is of low environmental and agricultural value (such as LIH's site in St Mary Cray). This land could be put to better use for housing and other uses that integrate with existing communities and transport networks. This could be done without undermining the integrity of the wider Metropolitan Green Belt.

The benefits of allowing a wider range of options for making the best use of land, including Green Belt land, are:

1. **Greater investment in community facilities.**

In the same way as high-density brownfield development, sustainable strategic urban extensions provide a critical mass of people to support the investment required to build the schools, health services and public transport infrastructure neighbourhoods need to work. The added benefit of sustainable strategic urban extensions is they usually have lower development costs than previously developed land, which mean that there is scope to reasonably delivery more public benefits, alongside affordable housing.

2. **A more balanced distribution of new housing and investment across the whole of London.**

Brownfield land and Green Belt is not evenly distributed across London. For example, LB Bromley has 52% Green Belt coverage, compared to 27% in neighbouring LB Croydon. A housing strategy that is solely focused on brownfield sites, will result in the uneven delivery of housing and mean that outer London Boroughs, like LB Bromley where there are less opportunities for intensification on brownfield land, will not be able to meet their housing needs.

3. **A wider range of housing types.**

A housing strategy focused solely on brownfield land will force developers to deliver the same high-density apartment led schemes to meet density policies and in order to be viable. Without a more balanced approach the wide range of houses needed by Londoners, including affordable family homes, will not be achieved.

4. **More affordable housing.**

Where appropriate in sustainability terms, limited Green Belt releases should only be supported where they can deliver a significant proportion of affordable housing. The current London Plan is delivering less than 20% affordable housing.

Change sought to Policy GG2

The wording of Policy GG2 should be amended as follows (or words to the effect of):

*To create **attractive** ~~high-density, mixed-use~~ places that make the best use of land, **including** high-density mixed-use places, those involved in planning and development must:*

"…

*D. protect London's **public and environmentally valuable** open spaces~~, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces,~~ and promote the creation of new green infrastructure and urban greening.*

*E. **where appropriate and in exceptional circumstances, explore opportunities to make better use of Green Belt land that is not environmentally valuable, adjoins existing urban development and is well connected by existing or planning public transport***

F. ~~E.~~ plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock growth.

…"

User:	HB Reavis UK Limited

HB Reavis supports policy CG2, which seeks to prioritise the development of Opportunity Areas, brownfield land and sites which are well-connected by existing or planned transport infrastructure. We note that achieving these objectives will enable other objectives to be met, such as the protection of London’s open spaces from development. HB Reavis also particularly supports plans for good local walking, cycling and public transport connections and enabling car-free development that allows efficient use of land, as well as using new and enhanced public transport links to unlock growth.

User:	Bishopsgate Goods Yard Regeneration Limited

Our client strongly supports the Mayor’s commitment to creating high-density mixed-use places that make the best use of land. The policy’s emphasis on the need to prioritise the development of Opportunity Areas and brownfield land, in addition to maximising the potential of sites around transport hubs is strongly promoted. The Bishopsgate Goods Yard site is the largest brownfield sites located within the City Fringe Opportunity Area, which includes a transport hub located on the site (Shoreditch High Street Station), and has the opportunity to deliver a high-density mixed-use place. Therefore, it is imperative that the London plan promotes high density development of brownfield sites located within Opportunity Areas to ensure the minimum targets within the plan are achieved.

User: Lands Improvement Holdings

INTEGRATED IMPACT ASSESSMENT

Whilst it is recognised that the Integrated Impact Assessment (IIA) is an ambitious document, in places it should be made clearer and its scope extended. Without doing this further work, it is not possible to conclude that the draft London Plan is based on a justified evidence base that represents the most appropriate strategy, considered against reasonable alternatives in accordance with NPPF182.

In addition, some of the recommendations included in the IIA have been ignored and should have been reflected in draft policies in the London Plan (see below).

Strategic options

The IIA is not supported by a Green Belt Review. As a result, the reported conclusions on the relative value of the Green Belt are not justified.

Without a comprehensive Green Belt Review (or the option for one through future Local Plans) the IIA adopts too narrow an approach to the opportunity for and benefits of limited Green Belt release in London. Proper consideration of limited Green Belt release as a reasonable alternative should be included in the IIA. Particularly where boundaries have not been reviewed for over 80 years and it is proposed to not meet FOAN for housing.

Policy GG2 (page 43)

IIA Option 4 for Policy GG2 considers “selective” Green Belt release, without defining what selective means or identifying proposed locations.

Even so the IIA states:

“This [Selective Green Belt Release] *would bring a range of local economic benefits, helping to meet local demands and contribute to service and infrastructure provision. The release of land around commuter hubs could help to maximise and enhance strategic public transport infrastructure, underpinning sustainable growth. Green belt release in sustainable locations and areas of high PTAL could encourage inclusive growth, allowing access to the wide range of opportunities London has to offer. Increased public transport would contribute to improvements in air quality by reducing private vehicle use and associated emissions. Similarly, associated traffic noise would also decline and good design can help to ensure the number of people exposed to high levels of noise is in decline. This option also promotes the delivery of employment and housing land which will benefit businesses and residents alike, and could play a role in strengthening the long term competitiveness of London” (Page49).*

Despite the benefits identified above, Option 4 was discounted on environmental grounds. The decision to discount Option 4 was made without reference to any specific sites, a Green Belt Review or Ecological Assessment. Much of the Green Belt surrounding London has been intensely farmed, with low ecological value. New development of intensely farmed sites can deliver biodiversity gains, through creating new habitats. This is the case on all LIH’s sites.

The IIA goes on to state that the release of Green Belt land was also discounted on the basis that:

“This [Green Belt] *land often supports a range of social activities, including community events, sports and leisure uses and other schemes that support health and wellbeing. Although the release of green belt will prioritise low performing areas, this may have some adverse impacts on local communities, heritage assets and associated leisure opportunities. Releasing greenbelt land could also have negative impacts on flooding as it would increase the amount of nonpermeable, tarmac ground and reduce soils and trees to intercept water. Similarly, air quality would also be negatively impacted by reducing the amount of green space and trees available*

In the absence of a Green Belt Review, the consideration of specific sites and other supporting evidence, it is not possible to arrive at the conclusions that all Green Belt release will have negative environmental impacts, result in the loss of social and leisure opportunities, have negative heritage impacts, result in increase in flooding and have adverse air quality impacts.

Policy GG4 (page 61)

The consideration for Policy GG4, delivering the homes Londoners need, does not consider the opportunity for and benefits of providing affordable housing through limited Green Belt release.

Housing

Policy H1 (page 137)

The IIA recommendation states that the Policy H1 should provide further reference to delivering housing to meet a range of needs including affordable. The GLA response states that these issues are covered within policy H5, however this is not the case.

We support the IIA recommendation and it is recommended that Policy H1 is amended to include further references to affordable housing delivery (as outlined in earlier these representations).

Policy H3 (page 141)

Policy H3 seeks to ensure LPAs assess housing delivery against policy targets. The IIA appraisal recommends a more comprehensive monitoring and review process of housing delivery against London-wide targets which we support. However, this was not included in the draft policy.

A more comprehensive monitoring and review process should be incorporated within Policy H3 as per the IIA recommendation and as set out earlier in these representations.

Green Belt

Policy G2 (page 225)

The IIA fails to recognise the inherent conflict between Policy G2 and other policies in the London Plan; for example, not meeting London's full housing needs (Policy H1).

In the absence of a Green Belt Review, Policy G2 is not supported by evidence and is therefore not justified.

The IIA appraisal of Policy G2 is not objective and fails to identify the negative elements of Green Belt protection, including failing to meet housing and affordable housing needs, forcing new development to leapfrog the Green Belt resulting in unsustainable commuting patterns, and increased pressure to develop on urban open spaces and employment sites to meet housing needs.

User: Mr Paul McQuillen

I welcome the overarching policy GG2 concerning making the best use of land. This should be strengthened by reference in policy H1 to making use of excessive or redundant road space.
Proposed change: Policy H1 B2d) should be amended to include reference to excessive or redundant road space and other car-related infrastructure so that it reads **‘the redevelopment of surplus utilities and public sector owned sites, including excessive or redundant road space.’**

User:	Camden Town Conservation Area Advisory Committee

GG2 (C)

Draft policy: ‘Understand what is valued about existing places and use this as a catalyst for growth and place-making, strengthening London’s distinct and varied character.’

Our proposed amendments – reasoning: Our proposed revised text would ensure consistency with the rest of the Plan, and with the Plan’s stated heritage objectives.

Our proposed revised text: ‘Understand what is valued about existing places and use this as ~~a catalyst~~ the essential core for growth and place-making, protecting and actively strengthening London’s distinct and varied character.’

User:	London Travel Watch

It is noted that the Walk London Network is safeguarded. This is welcome; however, there is no policy support for the development of additional long distance walking routes.

There are still many locations where pavements do not exist, there are no dropped kerbs or crossovers, pavements are too narrow, pedestrian crossings unavailable or not at the locations pedestrians would want them. Sometimes there are physical barriers to comfortable and direct walking. There should, therefore be policies to ensure these deficiencies are rectified when development takes place.

The roll out of Legible London should be supported by a policy. It should specifically promote the map-based wayfinding signs, rather than the finger posts that have been allowed to proliferate over the last few years, contrary to the original concept of the scheme.

All streets should have street nameplates in an appropriate location.

User: The British Library

Policy GG2 – Making the best use of land

Whilst Parts A and B of this policy are supported in the context of ensuring that the best use of land, (especially brownfield land), it is considered that reference should also be made to the provision of learning and research space in appropriate locations within London, as well as all the other important land uses already referenced within this DLP policy.

This addition will accurately reflect the supporting text of the policy, which seeks to ensure communities are provided with a wide range of services and facilities.

User: Vital OKR

We challenge para 1.2.6 regarding the Mayor's Good Growth by Design programme as it seems to endorses an
increase in behind?closed?doors pre?application and during plan formation discussions, and further exclusion of the public / potentially affected parties. This is not inclusive nor fair and is not compatible with such as para 1.1.5 and 2.0.7.

Policy GG2 regarding making the best use of land could usefully have its point C re?drafted to make clear that its scope goes wider than built fabric, that it also includes aspects of economic and civic life. We suggest amendments as follows, or similar (grey is existing text, blue struck indicates suggested deletion, red indicates suggested additional text):

C
Understand what is already present and valued about existing places, both built fabric and activities, including economic and civic life, and use this as a catalyst for growth and place?shaping ~~making~~, strengthening London's
distinct and varied character and its capacity to welcome.

Linking to this, we suggest the following paragraph text amendment:

Para 1.2.7
London's distinctive character and heritage, and its diverse economic and civic life, is why many people want to come to the city. As new developments are designed, the special features that Londoners value about a place, such as cultural, historic or natural elements, and the activities that take place on land and buildings, can be used positively to guide and stimulate growth, and create distinctive, attractive and cherished places.

User: Oxfordshire County Council

Specific housing sites are to be allocated through local plans prepared by the Boroughs - the draft London Plan only identifies potential Opportunity Areas. Policy GG2 directs those involved in planning and development to make the best use of land by prioritising the development of Opportunity Areas, brownfield land, surplus public land, sites that are well-connected to tube/rail stations, in/on edge of town centres and small sites. OCC agrees that these priorities make for sound planning principles.

However, in addition Policy GG2 requires protection of London's open spaces, including the Green Belt. Policy G2 also proposes that protection be given to the Green Belt and says that the extension of the Green Belt will be supported, where appropriate and its de-designation will not.

It is OCC's view that London should consider finding more capacity in the plan period through selective Green Belt releases in the outer Boroughs, just as many authorities in the surrounding South East are currently doing to sustainably meet their own identified housing needs (and unmet needs of neighbours). In Oxfordshire, allocations in the Oxford Green Belt have been confirmed in the adopted Vale of White Horse Local Plan and significant Green Belt releases are being proposed in the emerging Cherwell and South Oxfordshire Local Plans to meet needs in the Oxfordshire Housing Market Area, including unmet needs of Oxford City.

User:	The Forestry Commission

GG2 - best use of land - urban forests is a champion of multi-functional land use delivering social, environmental and economic benefits; there is significant scope to improve land use benefits through e.g. woodland creation on green belt and other land – and should be considered as part of Opportunity Areas and Development Plans.

User: CFGN Community Food Growers Network

We propose the following edits to the policies in GG2:

To create liveable-density, mixed-use places that make the best use of land, engaging those involved in planning and development, which should incorporate local community representation, and which must:

- **A. prioritise the environmentally and socially sustainable development of all London land with a view to optimising the use of Opportunity Areas, brownfield land, surplus public sector land, sites which are well-connected by existing or planned Tube and rail stations, sites within and on the edge of town centres, and small sites.**
- **B. proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling, applying a design–led approach and prioritising the development of lifetime neighbourhoods with pro-active food supply hubs.**
- **D. Protect London's open spaces, including the green belt, metropolitan open land, designated nature conservation sites, allotments, public gardens and other local green spaces, and promote the creation of new green infrastructure and urban greening activities which value the productive use of green space, such as integrated food growing hub development, which supports and enables health and well-being in the city.**
-

E. plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock sustainable growth.

- **F. maximise opportunities to use infrastructure assets for more than one purpose, to make the best use of land and support efficient maintenance as well as the well-being and livelihood of communities living in the area.**

- **G. be mindful of the need to optimise the use of space, so that intensification planning at borough level incorporates sufficient integrated impact assessment to ensure changing land uses do not impact adversely those whose claims on the land have been hitherto less well represented. Furthermore, no new land use should have the effect of displacing heritages and cultures that are part of what is widely recognised as giving London its special character as a 'world city'**

The narrative for GG2 will need to change to read as follows:

- 1.2.2. The key to achieving this will be taking a rounded approach to the way neighbourhoods operate, making them work not only more space-efficiently, **but also better for the people who use them, creating lifetime neighbourhoods which recognise the need for developments to reflect the social and cultural impact of any proposed changes**. This will mean creating **and rehabilitating** places of higher, **but still liveable, densities in appropriate locations to get more out of limited land, encouraging a mix of land uses, including those associated with increasing London's food security in accordance with the good sense of the Sustainable Development Goals** and co-locating different uses to provide communities with a wider range of services and amenities.

- 1.2.6. As London develops, the Mayor’s Good Growth by Design programme - which seeks to promote and deliver a better, more inclusive form of growth on behalf of all Londoners - will ensure that homes and other developments are of high quality. Existing green space designations will remain strong to protect the environment, **to recognise the critical importance of the food system of London as being central to the maintenance of London's food security, as it has been since London's inception as well as improvements to green infrastructure, which centres the productive use of green space for food growing,** biodiversity and other environmental factors, delivering 50 per cent **productive** green cover across London, will be important to help London become a National Park City **which is also attentive to the need to provide for food security and the provision of a way for Londoners to have an accessible way to support and promote health and well being**.

- 1.2.7 London’s distinctive character and heritage is why many people want to come to the city. As new developments are designed, the special features that Londoners value about a place, **and contribute to shaping,** such as cultural, historic or natural elements, can be used positively to guide and stimulate **further** growth, **mutual respect and cohesion,** and create distinctive, attractive and cherished places

The changes here must be supported by wording in GG1 to the effect of anchoring the proposals in a discussion about Lifetime Neighbourhoods, social cohesion through respect of diversity and supporting accessibility in a broad way. It also needs to embellish the idea that a home is place from which the occupants can easily access productive opportunities, which contribute to growth of the local economy and which accord with the other aspirations of the plan with regards to sustainability, walking, cycling and use of public transport and supporting the local heritage and culture of all communities.

User: Mr Tony Kane

I consider that the plans should take into account neighbour hood planning.

Small development sites can be identified by local groups as either suitable or unsuitable. Local groups are the experts in this area (Good Growth Policy GG2)

many communities are already preparing neighbourhood plans. It is vital that they are recognised and given proper attention.

Local groups have done valuable work on infrastructure projects.(Cross Rail 2) This work should not be wasted.

User:	Elephant & Castle Properties Co Limited

Policy GG2 – Making the best use of land. We support this policy and note that the proposal for Elephant & Castle is high density mixed-use development on well-connected brownfield land within an Opportunity Area.

User: Owners and Tenants of Cygnus Business Park

Policy GG2: Making the best use of land

4.2 The London Plan should seek proactively to drive and support sustainable economic development to deliver homes, business and industrial units, infrastructure and thriving local places that the country needs in accordance with the third Core Planning Principle of the Framework. The express objective of the Framework is to “boost significantly the supply of housing” as clearly set out in Paragraph 3 and 47 of the Framework and now embedded in the National Planning Practice Guidance.

4.3 We welcome the Mayor’s support, in paragraphs 1.2.2, for development which makes the most efficient use of land, encouraging the co-location of different uses to create high density mixed use environments, including the redevelopment of brownfield sites and the intensification of existing uses.

4.4 In particular we strongly support the importance Policy GG2 places on the prioritisation of redevelopment and intensification opportunities on brownfield land and its ability to provide on-going support for London’s growth as espoused in GG2 A) and B). The importance of this is recognised in the Framework’s Core Planning Principles at paragraph 17 and reconfirmed at paragraph 111.

4.5 There is, however, no intrinsic connection in the Plan, even when read holistically, between Policy SD10 and Policy GG2(B) which indicates that the Boroughs should take positive action to ascertain the capacity for intensification of existing uses and especially to plan positively for mixed use redevelopment and regeneration of existing business areas which can both protect the local economy and deliver the housing needed.

4.6 Policy GG2 is therefore unsound as it is not positively prepared. It should be amended to state that:

To create high-density, mixed-use places that make the best use of land, those involved in planning and development ~~must~~ should actively identify and bring forward plans to:

A. [unchanged]

~~B. Proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling, applying a design–led approach~~ Secure the intensification of land uses in sustainable locations by supporting proposals for the development of new homes and workspaces, redevelop existing areas where it can lead to the creation of mixed uses which will boost the housing stock whilst retaining job opportunities and through applying a design–led approach, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling.

User: Ms Deirdre Woods

2. BEST USE OF LAND

I propose the following edits to the policies in GG2:

GG2:

To create liveable-density, mixed-use places that make the best use of land, engaging those involved in planning and development, which should incorporate local community representation, and which must:

- **A. prioritise the environmentally and socially sustainable development of all London land with a view to optimising the use of Opportunity Areas, brownfield land, surplus public sector land, sites which are well-connected by existing or planned Tube and rail stations, sites within and on the edge of town centres, and small sites.**

- **B. proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling, applying a design–led approach and prioritising the development of lifetime neighbourhoods with pro-active food supply hubs.**

- **D. Protect London's open spaces, including the green belt, metropolitan open land, designated nature conservation sites, allotments, public gardens and other local green spaces, and promote the creation of new green infrastructure and urban greening activities which value the productive use of green space, such as integrated food growing hub development, which supports and enables health and well-being in the city.**

- **E. plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock sustainable growth.**

- **F. maximise opportunities to use infrastructure assets for more than one purpose, to make the best use of land and support efficient maintenance as well as the well-being and livelihood of communities living in the area.**

- **G. be mindful of the need to optimise the use of space, so that intensification planning at borough level incorporates sufficient social impact assessment to ensure changing land uses do not impact adversely those whose claims on the land have been hitherto less well represented. Furthermore no new land use should have the effect of displacing heritages and cultures that are part of what is widely recognised as giving London its special character as a 'world city'.**

User:	Ms Deirdre Woods

• 1.2.2. The key to achieving this will be taking a rounded approach to the way neighbourhoods operate, making them work not only more space-efficiently**, but also better for the people who use them, creating lifetime neighbourhoods which recognises the need for developments to reflect the social and cultural impact of any proposed changes.** This will mean creating **and rehabilitating** places of higher**, but still liveable, densities in appropriate locations to get more out of limited land, encouraging a mix of land uses, including those associated with increasing London's food security in accordance with the good sense of the Sustainable Development Goals** and co-locating different uses to provide communities with a wider range of services and amenities.

User:	Ms Deirdre Woods

- 1.2.6. As London develops, the Mayor’s Good Growth by Design programme - which seeks to promote and deliver a better, more inclusive form of growth on behalf of all Londoners - will ensure that homes and other developments are of high quality. Existing green space designations will remain strong to protect the environment, **to recognise the critical importance of the food system of London as being critical to the maintenance of London's food security, as it has been been since London's inception and improvements to green infrastructure, which centres the productive use of green space for food growing,** biodiversity and other environmental factors, delivering 50 per cent **productive** green cover across London, will be important to help London become a National Park City **which is also attentive to the need to provide for food security and the provision of a way for Londoners to have an accessible way to support and promote health and well being.**

User: Ms Deirdre Woods

- 1.2.7 London’s distinctive character and heritage is why many people want to come to the city. As new developments are designed, the special features that Londoners value about a place, **and contribute to shaping**, such as cultural, historic or natural elements, can be used positively to guide and stimulate **further** growth, **mutual respect and cohesion**, and create distinctive, attractive and cherished places

The changes here must be supported by wording in GG1 to the effect of anchoring the proposals in a discussion about Lifetime Neighbourhoods, social cohesion through respect of diversity and supporting accessibility in a broad way. It also needs to embellish the idea that a home is place from which the occupants can easily access productive opportunities, which contribute to growth of the local economy and which accord with the other aspirations of the plan with regards to sustainability, walking, cycling and use of public transport and supporting local heritage and culture.

User: Persimmon Homes

Persimmon supports the objective of making best use of land.

Whilst we recognise the purposes and importance of the Green Belt around London, it should be for the individual London Local Authorities to undertake a Green Belt review and ascertain whether there are exceptional circumstances to warrant altering the boundaries. The London Plan should not direct local authorities not to review designations when they are preparing Local Plans and wish to make decisions about how they can best accommodate development. The approach in the London Plan goes beyond the test set out in the NPPF (para 83) and is not compliant.

User:	Durkan

Several policies support the optimisation of land, particularly in highly accessible locations:

Policy GG2 (making the best use of land) identifies scope to intensify the use of land through high density development on well-connected sites, including public land, to support additional homes and workspaces. Durkan is active in both inner and outer London locations and so welcomes this additional policy support.

User: Legal and General Capital

CHAPTER 1 – PLANNING LONDON'S FUTURE

Policy GG2 - Making the best use of land

Policy GG2 is too restrictive to meet the needs of Londoners and should be expanded to include further options for making the best use of land.

This should include a review of the Green Belt to identify land adjoining existing urban areas that does not make a positive contribution to the Green Belt or nearby communities. Where such sites are well-connected by existing or planned public transport, opportunities to make better use of these limited areas of Green Belt should be explored.

Without a Green Belt review, or provisions in place to review Green Belt boundaries through subsequent borough level Local Plans, it is not possible to conclude that the proposed London Plan is sound and NPPF compliant. The draft London Plan does not represent justified and positive planning to identify the most appropriate strategy for meeting London's housing and employment needs having regard to the overall sustainability balancing act.

The benefits of allowing a wider range of options for making the best use of land, including Green Belt land, are:

- Greater investment in community facilities;
- A more balanced distribution of new housing and investment across the whole of London;
- A wider range of housing types; and
- More affordable housing.

User: Croydon Limited Partnership

Chapter 1 is concerned with planning for good growth to improve the health and quality of life of all Londoners, and Policy GG2 is focussed on making the optimum use of land. In order to create high-density, mixed-use places that make the best use of land, the policy states that those involved in planning and development must (amongst other things) prioritise the development of Opportunity Areas (“OA”s), town centres, and sites which are well connected. In addition, they must proactively explore the potential to intensify the use of land to support additional homes and workspace and promote high density development, applying a design-led approach.

CLP supports the approach identified within Policy GG2 to making the best use of land. It is considered that directing high density development, as well as exploring the intensification of land uses, within well connected OAs and town centres is a welcome response to ensuring growth within London occurs in an appropriate manner.

User: Legal and General Capital

Strategic options

The IIA is not supported by a Green Belt Review. As result the reported conclusions on the relative value of the Green Belt are not justified. Without a comprehensive Green Belt Review (or the option for one through future Local Plans) the IIA adopts too narrow an approach to the opportunity for and benefits of limited Green Belt release in London. Proper consideration of limited Green Belt release as a reasonable alternative should be included in the IIA. Particularly where boundaries have not been reviewed for over 80 years and it is proposed to not meet FOAN for housing.

Policy GG2 (page 43)

IIA Option 4 for Policy GG2 considers “selective” Green Belt release, without defining what selective means or identifying proposed locations.

Even so the IIA states:

“This [Selective Green Belt Release] would bring a range of local economic benefits, helping to meet local demands and contribute to service and infrastructure provision. The release of land around commuter hubs could help to maximise and enhance strategic public transport infrastructure, underpinning sustainable growth. Green belt release in sustainable locations and areas of high PTAL could encourage inclusive growth, allowing access to the wide range of opportunities London has to offer. Increased public transport would contribute to improvements in air quality by reducing private vehicle use and associated emissions. Similarly, associated traffic noise would also decline and good design can help to ensure the number of people exposed to high levels of noise is in decline. This option also promotes the delivery of employment and housing land which will benefit businesses and residents alike, and could play a role in strengthening the long term competitiveness of London” (Page 49).

Despite the benefits identified above, Option 4 was discounted on environmental grounds. It was considered that the selective release of green belt land could have adverse impacts on species and habitats, and could set precedent for further green belt release, putting further natural capital at risk. The decision to discount Option 4 was made without reference to any specific sites, a Green Belt Review or Ecological Assessment.

The IIA goes on to state that the release of Green Belt land was also discounted on the basis that:

"This [Green Belt] land often supports a range of social activities, including community events, sports and leisure uses and other schemes that support health and wellbeing. Although the release of green belt will prioritise low performing areas, this may have some adverse impacts on local communities, heritage assets and associated leisure opportunities. Releasing greenbelt land could also have negative impacts on flooding as it would increase the amount of non-permeable, tarmac ground and reduce soils and trees to intercept water. Similarly, air quality would also be negatively impacted by reducing the amount of green space and trees available to act as a carbon sink for emissions" (Page 49).

In the absence of a Green Belt Review, the consideration of specific sites and other supporting evidence, it is not possible to arrive at the conclusions that all Green Belt release will have negative environmental impacts, result in the loss of social and leisure opportunities, have negative heritage impacts, result in increase in flooding and have adverse air quality impacts.

Policy GG4 (page 61)

The consideration for Policy GG4, delivering the homes Londoners need, does not consider the opportunity for and benefits of meeting affordable housing through limited Green Belt release. Including the potential to help to meet the London Plan strategic 50% affordable housing target.

User: CFGN Community Food Growers Network

a suggested addition to GG2:

G. That, mindful of the need to optimise the use of space, intensification planning at borough level ensures there is sufficient social impact assessment to ensure changing land uses do not impact adversely those whose claims on the land have been hitherto less well represented. Furthermore no new land use should have the effect of displacing heritages and cultures that are part of what is widely recognised as giving London its special character as a ‘world city’.

User: Dagenham Dock Limited

Draft Policy GG2 – Making the best use of land

DDL is supportive of the Mayor's focus on high-density, mixed use development in order to make best use of land in order to accommodate London's growth. DDL supports Draft Policy GG2a which seeks to prioritise the development of Opportunity Areas, brownfield land, surplus public-sector land and sites which are well connected by existing or planned public transport infrastructure or on the edge of town centres. However, with such an intensive focus being placed on Opportunity Areas, Draft Policy GG2 needs to avoid conflict with any other policies within the London Plan. For example, the retention and intensification of SIL and LSIL – see responses to Policies E4-E7 below.

User: Footwork Architects Limited

Principle 1
Social needs must be identified and addressed as a prerequisite to development

Description:

Whether creating a new neighbourhood, or regenerating an existing one, to transform the built environment alone will not provide for social needs. There must be a thorough understanding of social context and existing problems, then specific steps identified to address them. Until these social factors are tackled, built environment professionals cannot create the physical conditions to help a community thrive. It is essential to avoid repeating the mistakes of the past and to learn from what has worked, through developing and implementing mechanisms for the measurement of success.

Assessment:
Methodology is already in place to assess local social needs:

- *Index for Multiple Deprivation* (the generally accepted measure)
- *Joint Strategic Needs Assessment* and *Joint Health and Wellbeing Strategies* (see Marmot
- Report and the Social Care Act 2012 – aimed at reducing health and social inequalities)
- *Healthwatch* (for local anecdotal data)

Application:

- Each borough to provide a **Social Needs Assessment** within their *Development Plan* and *Local Plan*, referred to within the *Core Strategy* and detailed as a Supplementary Planning Document, which must be kept updated
- This requirement could be inserted at Policy D2 of the Draft New London Plan, by dividing item ‘A’ into two parts. New ‘A’ to be an evaluation of socio-economic and well-being factors, heritage/ character and social infrastructure (currently points 1, 7 and 11); and new ‘B’ an evaluation of the data relating to physical and environmental factors (all the remaining points)

- Local authorities, Clinical Commissioning Groups and other service providers to take steps to address existing social needs, identified in the Social Needs Assessment and against agreed benchmarks, as a pre-requisite for designating *Opportunity Areas*, *Local Areas for Regeneration* and *Strategic Areas of Regeneration*
- *Supplementary Planning Guidance* (SPG) to be prepared (perhaps combined with the SPG on Social Infrastructure currently being reviewed - see below). This must be referenced in all strategic and major development proposals, with the inclusion of a Social Needs Assessment and a strategy for how identified local social needs and well-being are to be taken into account
- *Design Review Panels* to consider strategies to address social needs and well-being as an agreed component of the quality of a design. This must also to form part of the Mayor's planned Guidance on Design Reviews
- *Post-occupancy Surveys* (RIBA Plan of Work Stage 7) to become a contractual obligation for all major housing developments, at 1 year and 5 years after full occupancy. This will be an invaluable reference point for Development Plans and should be obligatory

[Policy GG2: 1.3.1, 1.3.2
Policy GG3: A, D
SD9: 2.10.2, 2.10.1, 2.10.3, 2.10.4; 2.10.5
Policy D2: A
Policy H13: 4.14.1
Policy S2: A: 1; 5.2.7, 5.2.8]

User: Brent Cross Cricklewood Development Partners

Chapter 1 is concerned with planning for good growth to improve the health and quality of life of all Londoners, and Policy GG2 is focussed on making the optimum use of land. In order to create high-density, mixed-use places that make the best use of land, the policy states that those involved in planning and development must (amongst other things) prioritise the development of Opportunity Areas (“OA”s), town centres, and sites which are well connected. In addition, they must proactively explore the potential to intensify the use of land to support additional homes and workspace and promote high density development, applying a design-led approach.

The DPs support the approach identified within Policy GG2 to making the best use of land. It is considered that directing high density development, as well as exploring the intensification of land uses, within well connected OAs and town centres is a welcome response to ensuring growth within London occurs in an appropriate manner.

User: Aitch Group

My client fully supports the aspirations of this policy to create high-density, mixed use places, that make the best use of land.

We note that the density matrix has been removed from this draft version of the London Plan and we welcome that as a general approach. However, it has been my clients experience that the matrix has been a useful tool to help justify development density in areas, particularly the outer boroughs, that do not always support the need for delivering at the higher densities.

We would request that this policy is made stronger to provide the policy framework that makes it clear that full advantage needs to be taken of the development of all suitable brownfield land to deliver housing. The policy should make it clear that unless a development results in a demonstrable significant adverse impact on amenity or townscape, permission should be granted without delay.

User:	Bexley Natural Environment Forum

1.2.5 – We do not believe that Brownfield sites should be so easily dismissed as unimportant and therefore ripe for development. Many Brownfield sites are important for biodiversity and need to be regarded as such. We suggest that a register of such sites is compiled and then evaluated for its wildlife value.

User: Highgate Society

GG2 (E) – Object

This issue ought to be much more nuanced. It is simplistic to conclude that transport by car is bad per se and should be reduced to 20% of all journeys. Walking, cycling and public transport at present levels is not always suitable for the elderly, those in poor health or disabled, for transporting goods or for heavily pregnant women. In addition in outer London and particularly for orbital travel, public transport is simply not available. In Highgate, we have excellent north south connectivity but are poorly connected east-west despite many years of lobbying TfL to address this. Access to Haringey Town Hall requires a journey into Kings Cross and out again or 3 very slow buses.

It is conceivable that the development of electric or other non-petrol vehicles will lessen environmental problems associated with motorcars. If car dependency is to be discouraged in the short term the concept of public transport must be reconsidered. The main focus must be on the convenience of the public consumers of the service.

Other than convenience, there is also the factor of cost. The cost of rail travel relative to income is greater than in other European countries. London cannot possibly house all those who work here, and no increase in housing stock is likely to solve this problem.

Planning new developments to reduce car dependency is called for on health grounds. Even now many developments have very restricted car parking spaces. However this will improve the life of Londoners only if the available public transport is convenient and affordable.

User: Middlesex University

Middlesex University London supports the focus on brownfield land and Opportunity Area development over greenfield in the Plan. Good growth demands that the quality of environment be seen as a vital asset for, and not just a hoped-for spill over from, economic growth. Middlesex researchers have championed the approach of ‘work[ing] backwards to understand how [social and community spaces and facilities] can be designed and managed to maximise the delivery of identified benefits in each context’4. Planning for the optimal social and economic benefit from the construction of liveable environments requires a close specification of those benefits.

The emphasis on the need for development to reflect what is valued about existing places is also welcome and reflects a clear research and practice theme in our own work. Our place-branding research regards ‘place attachment and loyalty’ as vital to securing the benefit of place for its community5. In its own locality, and across London, Middlesex University looks forward to celebrating and leveraging that value.

We are also supportive of the focus on maximising opportunities to use infrastructure assets for more than one purpose, as specified in the draft London Plan. The University has experience of dual usage of key civic buildings, such as Hendon Town Hall and library, where through effective collaboration space is shared to maximise usage and benefits for students and local people. We look forward to exploring further opportunities to use local infrastructure in this way, and believe that universities like this one can be imaginative partners in the development of environmentally sensitive and publicly beneficial dual use capital projects. We should relish the opportunity to help the Mayor define some models and opportunities in this regard.

User: Peabody

1. As one of London's largest developer of affordable housing we support the Draft Plan's ambition to make optimum use of land and develop high-quality homes that Londoners can afford.
2. The scale of Thamesmead, where Peabody is the majority landowner, means that it has the potential to make a significant contribution to tackling London's housing crisis.
3. We support maximisation of affordable housing provision but the success of the proposed "Fast Track Route" will be dependent on planning departments at borough level being properly resourced to process applications.
4. We would seek more explicit recognition in the Draft Plan that in areas with existing high levels of affordable / social housing provision, careful consideration should be given to how the tenure mix of new developments can contribute towards creating a more mixed community. For example, Peabody's development plans present an opportunity to rebalance the currently skewed housing tenure composition across Thamesmead. Through the regeneration we plan to deliver a greater diversity of housing typologies and tenures, with increased proportions of new homes for market sale alongside new low-cost rented homes. This would create greater diversity within communities and more balanced socio-economic profiles than there is currently. This shift will help to place Thamesmead on a more even footing with the rest of London by increasing the overall economic base and creating increased demand for different types of retail, leisure and workspace provision. Existing residents will of course be able to retain their residence in new or refurbished, high-quality homes
5. Additionally, we would like to query whether there is not a conflict between the ambition to make optimum use of land, and the Mayor's public commitment to introduce tenant ballots for regeneration. We consult our residents extensively when undergoing regeneration and work to engage them from an early stage, throughout the process. Without further detail on the Mayor's intentions it is difficult to comment, but we are concerned that a ballot, as a binary decision made at one point in time, does not capture the nuance of an exceedingly complex set of decisions. Additionally, we worry that the introduction of tenant ballots could put sorely needed new homes at risk, at the expense of future residents. We do not necessarily oppose ballots, but caution should be taken to ensure they do not become a tool to block new affordable homes.

User: Natural England

We support the measure within Paragraph D of this policy to ensure that planners protect designated local conservation sites, and promote the creation of new green infrastructure and urban greening. However, it is our opinion that the current national policy context (NPPF, paragraph 109) and drive to secure environmental net gains through planning (25 Year Environment Plan), and a growing number of commitments from organisations and Boroughs provide a clear and strong rationale for embedding a biodiversity net gain approach for all development within London. Our comments on Policy G6 provide our detailed thoughts on this matter, however we believe that this approach could be strengthened by referring to biodiversity net gain within this policy.

Recommendation:

We recommend that Point D of this policy is amended to read: ‘D Protect London’s open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening **which contribute to securing net biodiversity gains’.**

User:	Natural England

We support the emphasis of development on brownfield sites, however this approach could be strengthened by clarifying that ‘development and densification should be directed towards land of least environmental value, which contributes least to the provision of essential ecosystem service benefits.’, including provision of biodiversity, physical and mental well-being, integrated water cycle management, and adaptation to climate change impacts.

User:	Natural England

We welcome the recognition in Paragraph 1.2.6 of the objective to deliver 50% greenspace across London. Achieving this in the context of substantial growth in housing demand will be a significant challenge. Please refer to our comments on policies H1, H2 and G5, which relate to the interaction between development and the achievement of this green cover target.

User: London Chamber of Commerce and Industry

Policy GG2 Making the best use of land

10. LCCI supports efforts to densify and use brownfield and public-sector land most effectively, particularly near transport hubs.

11. In order to make best use of land across the capital, LCCI would urge the Mayor to fully exploit the work of the London Land Commission (LLC), which found that almost a quarter of land in the capital is owned by the public sector; this includes the police, NHS and transport agencies amongst others. This figure rises to 40% in some boroughs. Given the Mayor's 66,000 homes target per year, utilising land identified by LLC will be crucial.

12. The potential for the Mayor to play a greater role in securing housing for emergency workers was first highlighted by LCCI in our 2016 report, Living on the Edge: Housing London's Blue Light emergency services3. This found that over half (54%) of London's emergency services workers were living outside the capital – which remains the case today.

13. LCCI is concerned, however, that since the publication of its brownfield register, the ongoing purpose of the LLC is not fully understood. The Mayor could enhance the LLC by synchronising its activity with his Homes for Londoners agency with the aim of brokering deals with selected developers that would see a proportion of housing units built on any released public-sector land set aside as homes to rent only for emergency services workers – with the Office of Mayor of London acting as long-term landlord.

14. To aid this process, the Mayor should seek duty of cooperation powers over public bodies looking to sell land, as well as first right of refusal for the LLC, which should be bolstered with capital buying power.

15. Whilst we welcome the fact that the draft new London Plan seeks to explore all options to best utilise land throughout the capital, we are concerned that the Plan rules out any fresh assessment of the need or potential of building on any portion the capital's Green Belt. The Green Belt makes up 22% of land throughout the capital4, some of which LCCI has identified as disused, or is of poor quality – our definition of "brownspace"5. Ruling out development on Green Belt does not make the best use of available land in the capital and is inconsistent with Good Growth policies.

16. As our Brown for Blue report proposed, we believe the LLC should be tasked with formally identifying all brownspace land (i.e. derelict and underdeveloped land) in the Metropolitan Green Belt, as a precursor to an assessment of which parcels of that land might be better used (and viable) as housing (we have suggested for emergency services personnel, contributing to the capital's resilience) and any necessary, subsequent steps to open up that land for development through the planning process.

17. Our commissioned research suggested the Metropolitan Green Belt contains 329 hectares of "brownspace" which could be used to build up to 20,000 newbuilds.

User:	Chairs of Camden's Conservation Area Advisory Committees

GG2 – C Draft policy: ‘Understand what is valued about existing places and use this as a catalyst for growth and place-making, strengthening London’s distinct and varied character.’
Our proposed amendments – reasoning: Our proposed revised text would ensure consistency with the rest of the Plan, and with the Plan’s stated heritage objectives.
Our proposed revised text: ‘Understand what is valued about existing places and use this as a ~~catalyst~~ the essential core for carefully planned and monitored growth and place-making, protecting and actively strengthening London’s distinct and varied character.’

User:	CIBSE

We welcome the broad objectives and would stress the importance of mixed-use developments, including their contribution to other objectives of this Plan such as facilitating transport by walking and cycling, with associated benefits in terms of health, wellbeing, carbon emissions, and air quality.

User:	Aberdeen Standard Investments

We strongly support the aspiration of Policy GG2 to create high-density, mixed-use places which prioritise development of Opportunity Areas (OAs) and sites which are well-connected by existing or planned Tube and rail stations and that are within or on the edge of town centres.

We also strongly support part B of the policy which seeks to ensure that those promoting development proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting high density development, particularly on well-connected sites.

User:	Sustrans

A. We welcome the inclusion of public transport, walking and cycling connectivity in consideration over the intensification of land use, but note that the intensification of landuse also represents an opportunity to improve active and sustainable transport connectivity through planning.

D. We welcome the commitment to protect open spaces and promote the creation of new green spaces and infrastructure

E. We strongly support the policy to “plan for good local walking, cycling and public transport connections to support a strategic target of 80 percent of all journeys using sustainable travel…”

User:	Purley & Woodcote Residents Association

Removal of the density matrix

The PWRA would like the density matrix to be re-instated to ensure that new development suits local character and is at an appropriate level for the surrounding area – a major concern for Purley residents. The guidance now being proposed will, we believe, allow site developments in Purley which will not be suitable for or respect the area’s character.

User: Mx Beth Stewart

To create liveable-density, mixed-use places that make the best use of land, engaging those involved in planning and development, which should incorporate local community representation, and which must:

- A. **prioritise the environmentally and socially sustainable development of all London land with a view to optimising the use of** Opportunity Areas, brownfield land, surplus public sector land, sites which are well-connected by existing or planned Tube and rail stations, sites within and on the edge of town centres, and small sites.
- B. proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling, applying a design–led approach **and prioritising the development of lifetime neighbourhoods with pro-active food supply hubs.**
- D. Protect London's open spaces, including the green belt, metropolitan open land, designated nature conservation sites, **allotments, public gardens and other local green spaces,** and promote the creation of new green infrastructure and urban greening activities **which value the productive use of green space, such as integrated food growing hub development, which supports and enables health and well-being in the city.**
- E. plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock **sustainable** growth.
- F. maximise opportunities to use infrastructure assets for more than one purpose, to make the best use of land and support efficient maintenance **as well as the well-being and livelihood of communities living in the area.**
- **G. be mindful of the need to optimise the use of space, so that intensification planning at borough level incorporates sufficient social impact assessment to ensure changing land uses do not impact adversely those whose claims on the land have been hitherto less well represented. Furthermore no new land use should have the effect of displacing heritages and cultures that are part of what is widely recognised as giving London its special character as a 'world city'.**

The narrative for GG2 will need to change to read as follows:

- 1.2.2. The key to achieving this will be taking a rounded approach to the way neighbourhoods operate, making them work not only more space-efficiently, **but also better for the people who use them, creating lifetime neighbourhoods which recognises the need for developments to reflect the social and cultural impact of any proposed changes**. This will mean creating **and rehabilitating** places of higher, **but still liveable, densities in appropriate locations to get more out of limited land, encouraging a mix of land uses, including those associated with increasing London's food security in accordance with the good sense of the Sustainable Development Goals** and co-locating different uses to provide communities with a wider range of services and amenities.
- 1.2.6. As London develops, the Mayor’s Good Growth by Design programme - which seeks to promote and deliver a better, more inclusive form of growth on behalf of all Londoners - will ensure that homes and other developments are of high quality. Existing green space designations will remain strong to protect the environment, **to recognise the critical importance of the food system of London as being critical to the maintenance of London's food security, as it has been been since London's inception and improvements to green infrastructure, which centres the productive use of green space for food growing,** biodiversity and other environmental factors, delivering 50 per cent **productive** green cover across London, will be important to help London become a National Park City **which is also attentive to the need to provide for food security and the provision of a way for Londoners to have an accessible way to support and promote health and well being**.
- 1.2.7 London’s distinctive character and heritage is why many people want to come to the city. As new developments are designed, the special features that Londoners value about a place, **and contribute to shaping,** such as cultural, historic or natural elements, can be used positively to guide and stimulate **further** growth, **mutual respect and cohesion,** and create distinctive, attractive and cherished places

User: Mr Chris Rose

If you must use the 1984-ish 'good growth' then it should be defined as things that set out to hugely reduce London's ecological footprint and enhance biodiversity.

In 1.2.6 Existing green space designations will remain strong to protect the environment

But this doesn't work because the best areas for wildlife in most of London are SINCs and these have no real legal protection and so called 'economic arguments' are repeatedly used to justify trashing them. If the Mayor believes what he said abut the core role of SINCs in his Environment strategy he must do something about this.

GG2A fails to recognise the importance of brownfield for wildlife in the Thames gateway in particular.

User: Hornsey & Wood Green Labour Party

In general, we support the policy of creating high-density, mixed-use places: intensifying the use of land while utilizing existing assets and protecting and extending London's greens spaces, including the Green Belt, Metropolitan Open Land and conservation areas. However we also note the following concerns:

- prioritising as 'Opportunity Areas' small sites and those on the edge of town centres with existing communities transport links may help cut commuting and fit into the larger strategy of encouraging walking and cycling. However, it will not necessarily help the regeneration of poorer and more marginalised areas. It may also lead to longer commutes as employment opportunities may not tally with the skills of those actually living in a specific area.

- intensifying land use could result in over-occupation and overcrowding of various kinds and there needs to be stringent safeguards (see the chapter on Design) against both inappropriate small-scale housing and other developments.

- prioritising brownfield sites for development needs to be done sensitively, as many of these sites are important spaces for various kinds of wildlife. Developing these areas needs to be balanced by the extension of existing, or development of new, wildlife conservation areas, and other green spaces.

User:	Hornsey & Wood Green Labour Party

We welcome the overarching policy GG2 concerning making the best use of land. This should be strengthened by reference in policy H1 to making use of excessive or redundant road space.

User:	Thames Valley Housing Association

TVHA also support the more generalist policies such as Policy GG1 ‘Building strong and inclusive communities and Policy GG2 ‘Making the best use of land’, which supports high density

User: London Borough of Camden

The strategic principles set out in Policy GG2 are supported.

Criterion F - We welcome shared use of infrastructure assets, although this may be problematic in practice. For example, our experience has been that as the NHS reimburses GP practice rent, but it will not reimburse rent for other health uses, such as community healthcare, commissioned by the CCG. With GP practices unable to take on the risk associated with a lease, this is a significant barrier to sensible co-location of services.

User: Mr Gary Hayes

Policy GG2

(A) We object to the ongoing sell-off of public land for market housing development. This is not the best use of land. Public land should be protected to deliver homes for which there is the greatest need, particularly, the backlog of need for social-rented homes.

(B) There is absolutely no evidence that Opportunity Area development is meeting existing need. Grass roots evidence would suggest that these areas simply provide ‘opportunities’ for developers and need at the high end of London’s communities pretty much to the exclusion of lower income households.

(c) How do ordinary working class, lower income households, get to express what is of value to them? How are they to be heard? In most instances lower income households don’t engage in development of planning policy – because the language is too technical and there is an absence of funded support to facilitate their active engagement. When faced with more educated professionals and developers many feel they have an uneven chance to influence.

User:	Redrow Homes London Division.

The principle of this is welcomed.

This principle should be emphasised across the London Plan.

User: Sean Creighton

Policy GG2 Making the best use of land has some welcome goals, but in the real world where land use is driven by its values and by private developers it is not achievable.

12. The development of the Croydon Opportunity Area to-date has been driven by the private developers producing housing that does not meet the needs identified by the Council for existing Croydonians and their children.

13. The Council has admitted that there is an enormous funding gap in meeting the infrastructure needs created by the new multi-storey block developments.

14. The reference to surplus public sector land is ominous in that if and where it exists it should be developed to meet local needs not developer profits. Public land not under the control of local Councils should either be transferred to those councils or to community led housing and regeneration organisations for development.

15. Residents Associations in Croydon made it clear at the Croydon Local Plan examination that they are not against the intensification of land use as long as it complements or improves the character of the area. e.g. better use of accommodation over shops, raising single or double storey heights to 3 or 4 where these heights already exist in terracing.

16. Valuing existing places and strengthening London's distinct and varied character' can only be achieved if Councils are required to have Neighbourhood or District Forums of Councillors and the growing range of residents organisations, including Residents Associations Friends of Parks and Open Spaces, and special project groups, which can oversee the planning of the area.

17. In their evidence on the Croydon Local Plan (Partial Review) both Croydon TUC/CA and LNPC supported the goal of protecting open land, designated nature conservation sites and local spaces.

User: Andrea Carey Fuller

(A) We object to the ongoing sell-off of public land for market housing development. This is not the best use of land. Public land should be protected to deliver homes for which there is the greatest need, particularly, the backlog of need for social-rented homes.

(B) There is absolutely no evidence that Opportunity Area development is meeting existing need. Grass roots evidence would suggest that these areas simply provide ‘opportunities’ for developers and need at the high end of London’s communities pretty much to the exclusion of lower income households.

(c) How do ordinary working class, lower income households, get to express what is of value to them? How are they to be heard? In most instances lower income households don’t engage in development of planning policy – because the language is too technical and there is an absence of funded support to facilitate their active engagement. When faced with more educated professionals and developers many feel they have an uneven chance to influence.

User:	Kent County Council

D Protect and enhance London's open spaces and optimise the environmental services they deliver, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening.

F Maximise the resilience infrastructure assets and opportunities to use for more than one purpose, to make the best use of land and support efficient maintenance.

User:	Cross River Partnership

Any Policy that increases the care with which land use is determined, especially in Inner London where its relative scarcity raises its value, is to be welcomed. However, it is important that the level of local discretion on specific planning decisions in relation to smaller areas of land, which do not have wider strategic significance, is not reduced as a result of this Policy.

User:	Oneill Homer

GG2 Neighbourhood plans enable local communities, with their detailed knowledge and appreciation of their areas and how they function, to better judge how to make the trade-offs between land an instinct to seek little or no change with an acceptance that change is inevitable. Local communities are well placed to judge the likely positive and negative effects of development and redevelopment on the functioning of their place.

User: Unknown

Our client supports Policy GG2 of the London Plan. They recognise the importance of prioritising development of Opportunity Areas and ensuring high-density mixed-use developments are delivered on Brownfield land. Our client's site is a key example of this, maximising the potential of brownfield land on a site that is well connected by existing tube and rail stations, with an average PTAL rating of 4 and 5.

Whilst they agree with the prioritisation of development in the town centre, they also support Policy GG2's intention to support edge of town centre developments, recognising this type of development can often complement the town centre's offer rather than competing with it.

User:	Romford Civic Society
Paragraph 1.3.3. Recommend an addition (in CAPS) to the following sentence: “Access to green and open spaces, including waterways AND TREES, can improve health, but access varies widely across the city.”	

User: South East England Councils

3.2 SEEC welcomes the Mayor’s ambition to accommodate all London’s housing growth within its boundaries (London Plan para 2.3.1/4.1.1). Given the South East has its own significant pressures on housing, protected-land, transport and wider infrastructure, it would be wrong to assume there is capacity for the South East to accommodate any London overspill. Therefore we see 4 aspects of the Plan where further clarification is needed about how the Mayor will deliver his aim. If not addressed these will create uncertainty which could not only hinder delivery of the London Plan, but also impact negatively on the South East’s own local growth plans:

i) GLA’s SHMA shows London needs 66,000 homes a year and its SHLAA suggests capacity for 65,000 by making best use of land with high density/mixed uses (Policy GG2) – leaving a gap of 1,000 homes a year.

? The Mayor should clarify how he will address the 1,000 homes a year gap within London, to deliver his aim to meet London’s need in its boundary. The Mayor should also explain how he will consider the implications of Government’s proposed new housing need methodology if it is implemented.

? The Plan should also make it clear that responsibility remains with the Mayor/London to resolve any remaining unmet housing need from the SHMA. This is important to avoid speculative developers arguing that South East local plans should pick up London’s overspill in an ad hoc way, undermining South East councils’ own growth strategies.

? In consultation with partners including the WSE PSG, the Mayor should develop a clear and transparent delivery & risk monitoring framework for London Plan policy delivery/implementation. This should form the basis of regular reporting and discussion SEEC response to London Plan consultation - February 2018 Page 3 of 5 on progress at the WSE PSG, to help the GLA consider actions required to help address any Plan delivery issues.

User: L&Q

The following statement is welcomed: ‘All options for using the city’s land more effectively will need to be explored as London’s growth continues, including the redevelopment of brownfield sites and the intensification of existing places, including in outer London.’

This principle should be directly stated in Policy within the Plan. Whilst this has featured heavily in discussion around the Plan it is not as firmly emphasised in the actual Plan. Clear and tangible strategies in this respect are required.

User:	L&Q

Proactively explore the potential to intensify the use of land

The principle of this is welcomed.

This principle should be emphasised across the London Plan.

User: Socialist Health Association London

GG2

To create high-density, mixed-use places that make the best use of land, those involved in planning and development must:

1. prioritise the development of Opportunity Areas, brownfield land, surplus public sector land, sites which are well-connected by existing or planned Tube and rail stations, sites within and on the edge of town centres, and small sites.
2. proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling, applying a design–led approach.
3. understand what is valued about existing places and use this as a catalyst for growth and place-making, strengthening London's distinct and varied character.
4. protect London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening.
5. plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock growth.
6. maximise opportunities to use infrastructure assets for more than one purpose, to make the best use of land and support efficient maintenance.

USE OF LAND FOR HEALTHY LIVING

As a plan for London based on the need to address the spatial design of a world city, there is a greater need to compare and contrast with views on city planning around the world. For example in China and elsewhere, views are moving in the direction of much larger and more populous cities for efficient economies. Should London be scaling up to 13 million people living in a centre more dynamically one with centres of new technologies and research to the south, east west and north with transport to match?

Specialists in land planning who number amongst our members have also pointed out the course of land grabbing and privatisation of land over centuries, and its acceleration over the last 40 years. We feel compelled to point out the risk of this continuing to underpin many negative developments in London, and the danger of this continuing in the future – in particular with respect to sales of NHS land without due regard to either implications or alternatives.

The Naylor report on NHS estate recommends a massive sale of NHS land and facilities that are 'underused' or no longer required. But Naylor's definition of 'underused' is critically flawed and, equally, he recommends sale of NHS land in the absence of any overall strategy for NHS estate and before there has been any consideration of future NHS and associated needs. For these reasons, any current designation of NHS estate or properties is unwarranted and unsafe, and current NHS estate must not be included in any plans for alternative use.

It is crucial for London that the Naylor Report for NHS estates is not swallowed whole if we are to prevent the NHS sell off to be irredeemable.

We also refer you to our response in 11.1.40.

We hope to see London’s land used to ensure that neighbourhoods have access to multi -purpose facilities which support healthy lifestyles – in particular the use of NHS land.

London needs to retain GP and community health services that are close to where people live, so they are convenient and easily accessed, particularly by people with young children, elderly people and disabled people. Our NHS needs to be assessed in terms of ease and equality of access as well as clinical excellence. However this is not recognised in current plans for NHS services.

The NHSE / Government Plan for (UK-wide) NHS services envisages a reduction in annual spending of £26bn pa by 2021 compared with 2015 levels of spending. The main way this level of reduced spending can be achieved is through a massive reduction in the number of local GPs and community healthcare sites as well as closure of hospitals, beds and A&E services.

Reduction of sites will mean longer, problematic journeys involving great inconvenience or hardship particularly for people with young children, elderly and disabled people, who often need to make regular visits to surgeries.

Although a small number of procedures of course require specialist facilities, the vast majority of healthcare appointments can be carried out in local, non-specialist sites. The London Plan must ensure that London retains local healthcare services, and that convenience of access to healthcare and travel to facilities are given a high priority in all planning.

We hope to see London's land used to ensure that key workers in the medical field, the emergency services and children's services have access to decent affordable homes close to where they work.

We hope to see London's land used to create multi generational facilities where children and older people are cared for on the same site eg. http://unitedforallages.com

Where much needed housing is planned this needs to be developed in a health oriented way which allows for sufficient green space and public transport access. We explore this in more detail later in the document.

User: Mr Mark McCarthy

Response by Camden Town Conservation Areas to the Draft London Plan

Policy SD7 C, Fig 2.11, 2.16, and Fig A1.1:

We seek to delete naming Camden Town as a ‘metropolitan town centre’.

The Camden Town Estate was set out on land owned by the Earls of Camden between 1790 and 1870. It stretches from Brecknock Road to York Way, Kentish Town Road to St Pancras Way, Camden High Street to Crowndale Road, broadly on two axes. There was considerable coherence of architectural style, of Regency terraces, gardens and churches. During its development, the Regents Canal and the North London railway were built across, and Camden Town Station (now Camden Road Station on the Overground), at the junction of Camden Road and Royal College Street, became the central point.

The railways had a significant impact on the Estate – large goods yards were built on land of other landowners on either side. To the west, the land of Lord Southampton became were the railway yards around Chalk Farm and Hampstead Road. These were saved from the projected inner city ring road of the 1960s, and again saved by conservation to become Camden Market. To the east, the Agar estate (on land of the Prebendary of St Paul’s) became housing for working classes which were then demolished to be coal yards and now incorporated within the Kings Cross development.

Several Conservation Area lie across the Camden Town Estate in the Borough of Camden. The history, and quality of urban design, is recognised in several Historic England Grade II designations, including transport – the station and canal bridges – and much of the land is conservation area or locally listed. The later nineteenth and early twentieth century saw varied industrial development, especially many small works for the piano trade, but also larger industrial works, and diverse educational facilities.. Shops were built in Camden High Street, Camden Road and Brecknock Road. Postwar there has been some demolition of terraces and rebuilding with modernist public housing blocks – although some now regarded with less favour than the earlier terraces.

Differently from the historic Camden Town Estate, LB Camden's Local Plan designates a 'Camden Town' commercial Town Centre – from Mornington Crescent, along the High Street, around the Britannia Junction (Camden Town underground station) and along Hampstead Road to Chalk Farm (see Camden Local Plan 2017).

This has three components – the traditional shopping centre of the High Street, the tourist market within conserved buildings around Camden Lock and the railway land currently Morrison's supermarket. (Note that on LB Camden's current map of town centres, the area labelled 'Camden Town' lies over the Camden Town Estate, with the local neighbourhood shopping centre in black and North London Line / Overland station currently called 'Camden Road').

The term 'Camden Town' is therefore has several meanings. Neither the industrial area on the north of the Regent's Canal at Camden Lock, where is now the tourist market, nor the adjoining railway lands, where is now a supermarket, were the original Camden Town, although they are now adjacent to Camden Town underground station. Camden Road, central to the Camden Town Estate, has been an intersection for transport access and, as a result of the Borough of Camden's early adoption of conservation since the 1970s, the area has become attractive for small and medium-size media and professional offices. As an example, in a short row of nearby Rochester Place, NW1, are architect offices, 3-D printers, silversmith, artists studios, a former recording studio…

Character rather than transport links are the most important for Camden Town's development. Policy GG2 is at odds with needs for Camden Town

Policy GG2 proposes that "those involved in planning and development *must* prioritise the development of … sites which are well-connected by existing or planned Tube and rail stations, sites within and on the edge of town centres, and small sites."

‘Must’ is considered inappropriate for Camden Town – it implies absolute priority rather than relative. Camden Town Estate is ‘well connected’ and ‘on the edge of town centres’ but its status as heritage, character and community, and creative industries and professional economy are of equivalence importance to its PTAL rating. This concept is well presented in the Evidence to the Plan presented by Historic England in their Allies & Morrison report, which prioritises zones across London for their heritage and character, rather than the PTAL based on economic criteria of transporting car-less workers and consumers.

It is inequitable, and therefore contrary to the objectives of the Plan, for conservation areas further from a station, where car-use (and probably social class) is higher, should be less subject to the policy for increased density. At Camden Town, land development should be prioritised according its character, rather than because it happens also to have transport links.

Camden Town is a local, not London-wide, centre

Appendix Fig A1.5 places Camden Town as a ‘metropolitan town centre’ within an area for ‘high’ regeneration potential (20% IMD). But these two statements are insufficiently supported.

The Draft Plan should not identify Camden Town as a Metropolitan Town Centre

Policy SD7 C. states that ‘the classification of International, Metropolitan and Major town centres (see Annex 1) can only be changed through the London Plan.’ On the other hand, Table A1.1 in Annex 1 provides “an indication of potential future changes to the town centre network over the Plan period, including new potential centres”. While 2.7.4 states “These centres are not recommended for immediate reclassification”, the Draft Plan may be read as having already made a reclassification for Camden Town.

However, in London Plan 2015, Map 2.6 Camden Town is specified as a ‘major’ town centre, but not a Metropolitan Town Centre. And Camden’s Local Plan, completed in 2017, identifies five ‘Town Centres’ of equal status. LB Camden has **not** proposed Camden Town as a Metropolitan Town Centre.

Camden Town does not fulfil the criteria for a Metropolitan Centre.

The Plan states that Metropolitan centres “serve wide catchments which can extend over several boroughs and into parts of the Wider South East. Typically they contain at least 100,000 sqm of retail, leisure and service floorspace with a significant proportion of high-order comparison goods relative to convenience goods.” They also include “large shopping malls and town halls and civic centres”. This applies to Brent Cross, Shepherds Bush and Stratford, but not to Camden Town town centre, which is composed of three complementary retail activities – the High Street serving the local community, Camden (Lock) Market serving a tourist trade and the supermarket site (under development). (There is also a significant performance economy although, since the redevelopment of Kings Cross, Camden Town has also become an increased centre for illegal drugs, while the night-time economy with many alcohol retail points contributes to increasing inequalities in health through alcoholism and violence – contrary to the Mayor’s Public Health responsibilities, which it would be welcome for the plan to specifically identify.)

Camden Town should be a productive rather than consumer economy

The Camden Town economy should be towards production rather than consumption. Based on its heritage, and supported by the urban environment, Camden Town has a variety of sites that have potential for new use as innovative spaces and places celebrating values of the area since conservation of the 1970s. There is already an underlying framework of professional services, design companies, media companies, higher education. Camden Town is well placed to engage the international economy with high penetration through the internet, to be a hub for ideas and creativity. It should not become the show-rooms for web-order companies and the consumer economy.

LB Camden should retain planning control for Camden Town.

Under Article 7 of the Mayor of London Order (2008), the Mayor has the power to become the local planning authority for an application includes if development would have (a) a significant impact on the implementation of the London Plan (b) significant effects affects on more than one London borough. While Camden Town is centrally placed within the Borough, its transport links could be construed as ‘likely’ to affect other boroughs. We are concerned that the Mayor may use these powers for Metropolitan Town Centres, taking away local authority control.

User: UK Power Networks

We have a long-established and ongoing programme to identify property surplus to current and future operational requirements to meet existing and predicted load demands with surplus land released to the open market via a sale or letting arrangement. In addition, a submission is made to our regulator (Ofgem) who must be satisfied that customers' interests will not be compromised by the disposal.

These assets are available for acquisition by third parties for a variety of different uses including storage, industrial, residential, or commercial redevelopment. Where appropriate, proceeds from the sale are used to finance the enabling works, such as the relocation/renewal/consolidation of operational equipment and site separation. As well as contributing to the integrity of the network, the security of electrical equipment, ease of access for maintenance and helping to reduce ongoing maintenance/health & safety costs, these enabling works often result in visual improvements and noise abatement in the immediate environment.

The Asset Optimisation Programme provides benefits for customers on many fronts, all of which can be traced back to supporting polices with the London Plan:
? Removal of surplus assets results in a more efficient operation of our network, resulting in lower costs and hence lower bills for customers.
? Our regulatory framework stipulates that any returns from the proceeds of a sale are shared with customers (47%), resulting in again, lower bills for customers.
? Sale/reconfiguration of land presents the option to develop new residential and industrial usage helping to facilitate growth and maximising use of land.

User:	S Horne
To start with Pol GG2 to intensify use of land to higher density development is to overcrowd and construct too many dwellings and pack in too many people – No. Green Belt must not be built on.	

User: Cirrus Land and The Guinness Partnership

POLICY GG2 MAKING THE BEST USE OF LAND

We support the overarching aim of Policy GG2 to create high-density, mixed-use places that make the best use of land. To this end, we also support the aim to prioritise the development of Opportunity Areas, sites containing previously developed and made ground, sites which are well-connected by existing or planned railway stations and sites on the edge of town centres (GG2 Part A); and planning for good local walking, cycling and public transport connections to support a strategic target of 80% of all journeys using sustainable transport and using new and enhanced public transport links to unlock growth (GG2 Part E).

In our opinion, the development of Yiewsley Waterside (as described above) matches the aspirations of Policy GG2 and could deliver approximately 3,500 dwellings. Furthermore, by identifying sites such as Yiewsley Waterside for development, it would also reduce the need to develop land within sensitive parts of existing suburban areas, which could lead to its over-intensification and adversely affect its existing character.

We are, however, concerned that the New London Plan fails to capitalise on the important opportunities which are presented by proposals for sustainable development on sites such as Yiewsley Waterside.

Although the Yiewsley Waterside site is located within the Elizabeth Line West Growth Corridor the Heathrow/Hayes OAs, is predominantly previously-developed land (including made ground), is within 10 minutes' walk of West Drayton station and in close proximity to Yiewsley town centre, the site is currently designated as being Green Belt. The result of which is that, what could otherwise be considered to be a highly sustainable, policy compliant development which could deliver a significant number of new dwellings (including a policy compliant percentage of affordable housing), the proposed development of Yiewsley Waterside will be judged to be inappropriate development if the New London Plan is adopted as currently drafted.

We consider the wording of Policy GG2 Part D, and other policies and paragraphs of the New London Plan which preclude a review of existing Green Belt boundaries to be a shortcoming of the Plan. This also represents a significant missed opportunity to promote the necessary sources of supply of housing which could deliver the step-change in housing delivery identified by the Mayor; to encourage regeneration; and to encourage greater use of sustainable modes of transport – both in relation to London as a whole and for LB Hillingdon.

- **Request**

Further consideration should be given to the drafting of the New London Plan before it is Examined and changes made to it which encourage relevant LPAs to undertake focussed reviews of their Green Belt boundaries. Such reviews of the Green Belt should particularly focus upon those areas which comprise previously-developed land (including made ground), are located within what are currently defined as Growth Corridors and Opportunity Areas in the New London Plan and would deliver significant growth in locations that are served either by existing or proposed public transport. In this regard, changes should be made to Policy GG2.

User:	Kingston First

Whilst densification is a viable way of accommodating future growth, Kingston First supports to approach set out within draft Policy GG2, which seeks to make the best use of land. Historic centres such as Kingston comprise a large number of small plots. The policy should encourage Local Planning Authorities to explore whether the inclusion of any neighbouring plots of land would improve the quality of the scheme and deliver the largest possible public benefit.

User:	London and Continental Railways

While it is acknowledged that all of the Good Growth policies are important for the spatial vision of London, these representations only comment on the key policies that are relevant to Zone 5 and the approach towards employment land, future development for housing and making the best and most efficient use of land.

Key to setting this context is draft Policy GG2, which clearly states that to create high-density, mixed-use places that make the best use of land, Opportunity Areas, brownfield land, surplus public sector land, sites well-connected to transport and other town centre and small sites must be prioritised. This land should be explored for the potential to intensify its use, to support additional homes and workplaces, to promote higher density development particularly in locations where well-connected to public transport, walking and cycling. This draft policy sets a positive context to the approach which should be taken across all of the draft London Plan’s strategic policies, to ensure the potential of appropriate sites is optimised.

User: Solum

The Draft London Plan refers to an overall need for 66,000 homes per year for at least 20 years. This figure is informed by the 2017 SHMA carried by the GLA1. The methods used to estimate London's housing requirements in the 2017 SHMA closely follow those used in the 2013 SHMA. The 2013 SHMA was carried out before government had provided its guidance through the NPPG in 2014 and before the recent consultation on a standardised methodology for assessing need2.

The Draft London Plan London-wide housing target is a significant increase over the current target of 42,000. Historically, delivery has consistently fallen behind the targets. Completions reached a high point in 2015/16 when circa 39,000 homes were completed3. Whilst in the previous year completions were closer to 32,0004. This position is hugely ambitious and in order to achieve such a significant increase in the rate of housing delivery it is essential that the Draft London Plan encourages rather than constrains development.

To reach this figure the 2017 SHLAA relies heavily on the capacity of small sites, which it defines as sites of less than 0.25 hectares in size and which are essentially windfall sites. As a result the Draft London Plan sets targets for development of small sites (between 1 and 25 homes) to circa 25,000 new homes a year, which equate to 38% of the overall housing targets.

The NPPF (para 48) allows for windfall sites to be taken into account where there is compelling evidence that such sites have consistently become available and will continue to provide a reliable source of supply. Based solely on historic trends the evidence in the 2017 SHLAA's would indicate a supply closer to 10,000 new homes a year from small sites. We therefore question whether this target is achievable.

With a potentially significant shortfall in housing supply, the Draft London Plan must identify every source of housing and ensure that these can be delivered. Solum is able to contribute to Good Growth through optimising its assets with mixed-use redevelopment including the provision of housing. These sites are located adjacent to main line rail stations in London and they represent a unique opportunity to maximise housing delivery at the most sustainable locations in London.

Solum supports the text set out in policy GG 2 (Making the Best Use of Land) which seeks to prioritise the redevelopment of land which is well connected to rail stations and which seeks to intensify the use of land that are well connected by public transport. However we suggest that the policy is amended to make it clearer that land around rail stations will be specifically supported for high density development through the following changes to part B of GG2

Policy GG2 Making the best use of land

To create high-density, mixed-use places that make the best use of land, those involved in planning and development must:

B Proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density development, particularly on sites ***on and around rail stations and*** *that are well-connected by public transport, walking and cycling, applying a design–led approach.*

User: Airport Industrial Property Unit Trust

We note the significant focus given to making the best use of land, including the redevelopment of brownfield sites and the Intensification of existing places. Polley GG2 places emphasis on proactively exploring the potential to Intensify the use of land and promoting higher density development; particularly on sites that are well-connected by public transport, walking and cycling.

AIPUT welcomes the approach to high density development in appropriate areas, given that demand for space in urban areas at or close to public transport interchanges is expected to significantly outstrip land supply over the long term. We suggest that intensification should be directed towards employment sites to increase industrial floorspace and meet expected occupier demand. This enhanced intensification culture should form part of a spatial development strategy for London that also includes the sustainable development/release of other land, including, In exceptional circumstances, the release of Green Belt land to meet established demand.

User: Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living

GG1/2 (13 & 15) - Building Strong and Inclusive Communities and Making the Best Use of Land

We support the creation of a London where older people, disabled people and people with young children can move around with ease and enjoy the opportunities the City provides, creating a welcoming environment that everyone can use confidently, independently, and with choice and dignity, avoiding separation or segregation.

We support best use of previously developed land in sustainable locations within and on the edge of town centres, including smaller sites.

We support the intensification of existing sites to increase density to sustainable levels.

There should still be a view towards providing the right type of housing for the need and not just a focus on the provision of affordable housing. Research has shown that the population is ageing rapidly with the population of over 65 year olds in London well over 10% and as stated in the London SHMA, this is projected to nearly double within the plan period. As such the needs of the older population must be addressed now.

We support these policies.

User:	Age UK London - a charity working with older Londoners

POLICY GG2 MAKING THE BEST USE OF LAND

To create high-density, mixed-use AND AGE AND DISABILITY FRIENDLY places that make the best use of land, those involved in planning and development must: (rest of policy).

User:	Age UK London - a charity working with older Londoners

13. GG2 (see also evidence for GG1 above nos. 1, 3 and 6) Please note also that several international designers consider the interest of cyclists and pedestrians to be conflicting: Dissing and Weitling with their award-winning bicycle snake; “The area around the Fisketorvet Shopping Centre in Copenhagen was characterised by a particular problem - two distinctive groups of users, each with conflicting interests, cyclists and pedestrians.” Also, Converging Grounds: A design ‘charrette ‘on Density in Denmark hosted by the Van Alen Institute New York looked at multi modal use of streets. Amongst the proposals were different uses and users at different times of day. Older people themselves have told us that they are afraid of cyclists who jump lights when they, pedestrians, are crossing roads and that they are afraid of cyclists on pavements. They asked for a number of measures including increased cycle lanes.

User: Mrs Alona Sheridan

I welcome the overarching policy GG2 concerning making the best use of land. This should be strengthened by reference in policy H1 to making use of excessive or redundant road space.
Proposed change: Policy H1 B2d) should be amended to include reference to excessive or redundant road space and other car-related infrastructure so that it reads **‘the redevelopment of surplus utilities and public sector owned sites, including excessive or redundant road space.’**

User:	Blanche Cameron

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Proposed change: Policy H1 B2d) should be amended to include reference to excessive or redundant road space and other car-related infrastructure so that it reads **‘the redevelopment of surplus utilities and public sector owned sites, including excessive or redundant road space.’**

User:	Regeneration X

1.2.2 *The key to achieving this will be taking a rounded approach.... will mean creating places of higher density in appropriate locations.....ensuring a mix of land uses and co-locating different uses*. We are concerned that the definition of appropriate locations seems to be town centres and at train stations without any analyses of whether these are really appropriate locations. Some of London's Town Centres are not actually near to train stations; many of London's Train Stations do not have capacity on their lines to take more commuters, and this policy seems to be taken without regard to the actual practicability and therefore the deliverability of this intensification.

User:	Regeneration X

1.2.4 *Making the best use of land means directing growth towards the most accessible and well-connected places*. Having a place well-connected doesn't mean that the people living there can afford to access the transport. What is the point of intensification of land use around train stations if too many of the people living there cannot afford to use the service? There is no guarantee that public transport will continue to be affordable and so we are in danger of locking ourselves into a
poor quality living environment for the sake of an unaffordable transport system.

User:	Regeneration X

1.2.5 Mentions the intensification of outer London. Do those making the London Plan understand how outer London actually works? Have communities in outer London been engaged in agreeing to this policy? It appears that they do not and have not (in any meaningful way) and this will lead to communities fighting and resisting developments (even if technically these developments are in accordance with the New London Plan); in turn this makes the proposed plan undeliverable.
Is a walking, cycling and public transport orientated London suitable for an ageing population? Sure many older people can do all of this (some of the time), but as our population gets increasingly older and more infirm they will not be able to depend on these methods to get around.

User:	David Tannahill
- Paragraph 1.3.3. Recommend an addition (in CAPS) to the following sentence: “Access to green and open spaces, including waterways AND TREES, can improve health, but access varies widely across the city.”	

User:	Joy Brown

1.2.5 New and enhanced transport links will not be enjoyed by everyone. Even though I live in Inner London, I have no direct walkable access to the Underground, the DLR or the forthcoming Elizabeth Line which all require me to take a bus or train journey first. I depend on bus and train yet TfL is cutting services and the South East Trains franchise, which is up for renewal, proposes to stop all direct rail services to Charing Cross from my area.

User: Hackbridge & Beddington Corner Neighbourhood Development Group

Whilst we agree that more homes are needed, we disagree with a blanket approach of creating high-density, mixed use spaces. Whilst high-density does not necessarily
need to equate to high-rise buildings, the major housing developers do not use innovative designs. They use their standard designs, not taking the local vernacular into account, resulting in no place making for the existing community.

Planning applications should not be looked at on their own merit. They need to take into account the rest of the landscape and impact their development will have on a
local community.

Point D states to protect London's open spaces including Metropolitan Open Land. Our local community is seeing MOL stripped and used for the likes of an incinerator
and primary school. Are the new policies really sufficient to protect this land? They certainly haven't been in the past.

User: Matthew Robinson

2. BEST USE OF LAND

I propose the following edits to the policies in GG2:

GG2:
To create liveable-density, mixed-use places that make the best use of land, engaging those involved in planning and development, which should incorporate local community representation, and which must:

- A. **prioritise the environmentally and socially sustainable development of all London land with a view to optimising the use of** Opportunity Areas, brownfield land, surplus public sector land, sites which are well-connected by existing or planned Tube and rail stations, sites within and on the edge of town centres, and small sites.
- B. proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling, applying a design–led approach **and prioritising the development of lifetime neighbourhoods with pro-active food supply hubs.**
- D. Protect London's open spaces, including the green belt, metropolitan open land, designated nature conservation sites, **allotments, public gardens and other local green spaces,** and promote the creation of new green infrastructure and urban greening activities **which value the productive use of green space, such as integrated food growing hub development, which supports and enables health and well-being in the city.**
- E. plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock **sustainable** growth.
- F. maximise opportunities to use infrastructure assets for more than one purpose, to make the best use of land and support efficient maintenance **as well as the well-being and livelihood of communities living in the area.**
- **G. be mindful of the need to optimise the use of space, so that intensification planning at borough level incorporates sufficient social impact assessment to ensure changing land uses do not impact adversely those whose claims on the land have been hitherto less well represented. Furthermore no new land use should have the effect of displacing heritages and cultures that are part of what is widely recognised as giving London its special character as a 'world city'.**

User: Matthew Robinson

The narrative for GG2 will need to change to read as follows:

- 1.2.2. The key to achieving this will be taking a rounded approach to the way neighbourhoods operate, making them work not only more space-efficiently, but also better for the people who use them, creating lifetime neighbourhoods which recognises the need for developments to reflect the social and cultural impact of any proposed changes. This will mean creating and rehabilitating places of higher, but still liveable, densities in appropriate locations to get more out of limited land, encouraging a mix of land uses, including those associated with increasing London's food security in accordance with the good sense of the Sustainable Development Goals and co-locating different uses to provide communities with a wider range of services and amenities.
- 1.2.6. As London develops, the Mayor’s Good Growth by Design programme - which seeks to promote and deliver a better, more inclusive form of growth on behalf of all Londoners - will ensure that homes and other developments are of high quality. Existing green space designations will remain strong to protect the environment, to recognise the critical importance of the food system of London as being critical to the maintenance of London's food security, as it has been been since London's inception and improvements to green infrastructure, which centres the productive use of green space for food growing, biodiversity and other environmental factors, delivering 50 per cent productive green cover across London, will be important to help London become a National Park City which is also attentive to the need to provide for food security and the provision of a way for Londoners to have an accessible way to support and promote health and well being.
- 1.2.7 London’s distinctive character and heritage is why many people want to come to the city. As new developments are designed, the special features that Londoners value about a place, and contribute to shaping, such as cultural, historic or natural elements, can be used positively to guide and stimulate further growth, mutual respect and cohesion, and create distinctive, attractive and cherished places

The changes here must be supported by wording in GG1 to the effect of anchoring the proposals in a discussion about Lifetime Neighbourhoods, social cohesion through respect of diversity and supporting accessibility in a broad way. It also needs to embellish the idea that a home is place from which the occupants can easily access productive opportunities, which contribute to growth of the local economy and which accord with the other aspirations of the plan with regards to sustainability, walking, cycling and use of public transport and supporting local heritage and culture.

User: Matthew Robinson

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User:	Mrs Jean Smith

Change of use for structures should be the exxception, not encouraged. Houses are being converted into HMos, putting strain on resources and changing neighbourhoods. Churches are springing up everywhere, with no consideration theimpact has on the local communities.

User: London national Park City Foundation

Making the best use of land – Policy GG2, Pages 14 - 16

LNPCF supports the intention to:

1.2.1 This rapid growth will bring many opportunities, but it will also lead to increasing and competing pressures on the use of space. To accommodate growth while protecting the Green Belt, and for this growth to happen in a way that improves the lives of existing and new Londoners, this Plan proposes more efficient uses of the city's land.

1.2.2 The key to achieving this will be taking a rounded approach to the way neighbourhoods operate, making them work not only more space efficiently, but also better for the people who use them. This will mean creating places of higher density in appropriate locations to get more out of limited land, encouraging a mix of land uses, and co-locating different uses to provide communities with a wider range of services and amenities.

1.2.6 Existing green space designations will remain strong to protect the environment, and improvements to green infrastructure, biodiversity and other environmental factors, delivering 50 per cent green cover across London, will be important to help London become a National Park City.

1.2.7 London's distinctive character and heritage is why many people want to come to the city. As new developments are designed, the special features that Londoners value about a place, such as cultural, historic or natural elements, can be used positively to guide and stimulate growth, and create distinctive, attractive and cherished places.

Policy GG2

LNPCF supports Policy GG2:

To create high-density, mixed-use places that make the best use of land, those involved in planning and development must:

A. Prioritise the development of Opportunity Areas, brownfield land, surplus public sector land, sites which are well-connected by existing or planned Tube and rail stations, sites within and on the edge of town centres, and small sites.

B. Proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling, applying a design–led approach.

C. Understand what is valued about existing places and use this as a catalyst for growth and place-making, strengthening London’s distinct and varied character.

D. Protect London’s open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening.

E. Plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock growth.

F. Maximise opportunities to use infrastructure assets for more than one purpose, to make the best use of land and support efficient maintenance.

User:	Primrose Hill Conservation Area Advisory Committee

GG2 – C

Draft policy: ‘Understand what is valued about existing places and use this as a catalyst for growth and place-making, strengthening London’s distinct and varied character.’

Our proposed amendments – reasoning: Our proposed revised text would ensure consistency with the rest of the Plan, and with the Plan’s stated heritage objectives.

Our proposed revised text: ‘Understand what is valued about existing places and use this as ~~a catalyst~~ the essential core for carefully planned and monitored growth and place-making, protecting and actively strengthening London’s distinct and varied character.’

User: Mama Ujuaje

The Food heritage of London is rooted within its deepest past - but in what way is this fact acknowledged in terms of how the planning of its built environment is spoken of and designed?

Engagement with food is a basic activity of all Londoners and the diversity of this engagement is embodied in the variety of food system practices Londoners engage in; from the curried eel and mash shop to the haute cuisine Latin American offerings of Soho, from the occasional herbal supplement trader to Fortnum and Mason's food counters. Some few may keep goats for milk and others grow lettuces underground, to cater for the salad eaters of the city. The range in London food cultures derives from often turbulent histories which also relate to the detailed designs of London architecture, the characters of the town centres and the ways in which decisions are made about London's spaces, writ small as well as in how opportunity areas are configured, so writ large.

Markets ancient and modern have defined the central layout of London, the need to access local breweries, and a good supply of milk, meat and bread for the nobility have shaped the spaces which we take for granted in the West End and in the City, the plantation investments of distant shores defined the location of gentlemen's clubs, coffee houses, hotels, inns and trading places. The internal docklands have received the bounties plundered by City exploits bringing in tobacco, sugar, cotton and chocolate and wholesale markets have grown up around the associated businesses. Even the educational institutions which were built for the elite to learn how best to extract from and protect British territories abroad, which largely consisted of plantation economies or natural resource extraction operations form part of the capital's current heritage and culture today.

Knowing this, it is not possible to think of the spatial planning of London, with respect to heritage and culture, without factoring in the heritage and culture of the city's food and the diverse populations who have made parts of London their own and conferred unique cultures of trade, music, arts and ways of relating with each other, unique to them and shaping the way in which a place is understood, not only by its longer term citizenry, but also by those who have moved in, in waves of new settlements across London, with varying degrees of intensity.

It is therefore quite disingenuous to speak of the historic culture and heritage of London without referring to these things, yet this is what this chapter has done. It sets the tone for a ‘development’ of London which ignores the culture of its current citizens and treats history, the idea of heritage and the sense of culture almost as boxed artefacts to be handled as one might preserve or conserve an archive, an artefact, a history that is now dead and past, not as the living culture and heritage that continues this London tradition of constant change and stable traditions, diversity and constancy, a creative interplay of identities: ethnicity/race, class, creed, belief and more.

In responding to this, food growing networks have the opportunity to seek to insert into this chapter how the heritage and culture of London ought to recognise food growing traditions, however modern or however ancient; those associated with local knowledge and those knowledges from shores a great distance away and seek to preserve them and their benefits they bring to the practice

of growing as well as to the diverse communities of London. It might also argue that heritage and culture are concepts that are ongoing, rather than static and so should be embraced by policies and plans pertaining to London which make use of reconsidered changes to the land and natural resources of the city, in light of new understandings of the environment and food growing practice, such as that referred to as agroecology, which promises a positive renewal and adaptation of food growing in the context of human land use.

The use of the term heritage and culture might also be referred to by London’s food growing networks as needing to include and refer to London’s food heritage (which is diverse) and understanding that much of London’s current popular ‘culture’ revolves around food, its sourcing: local, its marketing: specialist, local farmer and ‘fresh’ and its consumption: specialist ‘foodie’.

What this approach ignores, however, is the food culture of the lower and working classes, children and the elderly, disabled, ethnic minorities and homeless.

Food is arguably a more important factor in the well-being of this part of London’s citizens than for others. A greater proportion of the income of the poor is spent on food than on any other basic household need.
https://www.ons.gov.uk/peoplepopulationandcommunity/personalandhouseholdfinances/expenditure/bulletins/familyspendingintheuk/financialyearendin

https://www.kelloggs.co.uk/content/dam/europe/kelloggs_gb/pdf/R3_Facts%20about%20Food%20
Poverty%20ReportFINAL.pdf

What kind of culture exists and continues to emerge in relation to these groups and how able have food growing networks been in responding to these cultures and their food system demands or needs and how do such networks visualise any spatial planning to enable a more full response to this sector of London's humanity to be better met by a plan for London.

However, given that the plan is considering all of London's structures: housing, transport, green infrastructure, etc., each of which interfaces with different aspects of the food systems of London, (which are, in themselves, connected to the food systems of the nation and indeed the globe), London's Food Networks will need to ensure that its responses reflect the current realities of how different types of Londoners interface with the food systems held within London cultures and researches and understands the factors which drive their development (or demise).

What, for example, is the response of food growing networks to the proposed closure of chicken shops and the narrative discourse around this policy move? Are they looking at the entire food system in which chicken shops sit: the supply chains, the alternative employment possibilities, the impact on where the 'school pound' is spent alternatively, the local economies, etc.? What might be the social impact assessment of a called for closure of chicken shops in a locality, especially one which involved the communities and other private/corporate agencies which are engaged in the food supply system for school children in the locality.

The awareness and pro-activity of a food growing advocacy network in holding this complexity is limited to how it frames its own work and the level of partnership it undertakes to foster with the range of institutions which represent other aspects of the food systems which feed all of diverse London.

So let us look at the specific policies under the London Plan Draft chapter on Heritage and Culture to see what might stand out for editing.

Firstly, what is the Good Growth framework policy that it sits in?
From GG1 policy D

promote the crucial role town centres have in the social, civic, cultural and economic lives of Londoners, and plan for places that provide important opportunities for face-to-face contact and social interaction during the daytime, evening and night time.

And a suggested addition to GG2:

G. That, mindful of the need to optimise the use of space, intensification planning at borough level ensures there is sufficient social impact assessment to ensure changing land uses do not impact adversely those whose claims on the land have been hitherto less well represented. Furthermore no new land use should have the effect of displacing heritages and cultures that are part of what is widely recognised as giving London its special character as a ‘world city’.

And From GG5 policy F

promote and support London’s rich heritage and cultural assets, and its role as a 24-hour city.
We can bear these in mind when considering the H&C policy recommendations:

User:	Regent's Park Conservation Areas Advisory Committees

GG2 – C Draft policy: ‘Understand what is valued about existing places and use this as a catalyst for growth and place-making, strengthening London’s distinct and varied character.’

Our proposed amendments – reasoning: Our proposed revised text would ensure consistency with the rest of the Plan, and with the Plan’s stated heritage objectives.

Our proposed revised text: ‘Understand what is valued about existing places and use this as ~~a catalyst~~ the essential core for carefully planned and monitored growth and place-making, protecting and actively strengthening London’s distinct and varied character.’

Policy GG3 Creating a healthy city

User: London Borough of Southwark

Social isolation and mental health are also prevalent health issues in which the built environment plays a role. The policy could be improved to require planning and development to increase opportunities for social interaction for all people. The London Plan will contribute to these opportunities with town centres, healthy streets, open spaces and culture and leisure facilities.

The policy could be strengthened by a greater commitment to Health Impact Assessments (HIAs), as these can help reduce health inequalities. HIAs should address the construction phase of development and focus on both physical and mental health.

HIAs will help Developers to identify important aspects of the masterplan and building design that can have an impact on health. Many features of development, such as increased and better access to open green space, play spaces and improved walkability/cycling infrastructure will have a positive effect on health, and an HIA will assist in gathering all these beneficial impacts in one single and accessible document.

There are various HIA templates currently available at the moment, such as HUDU's Rapid HIA tool and the Mayor may want to consider producing a London-wide HIAs guidance and template to assist Boroughs to ensure consistency, provided each individual Planning Authority will retain the ability to focus on specific and local health priorities.

User:	London Borough of Redbridge

Policy GG3 is welcomed, the principles of which are broadly reflected in the Council's Local Plan and health strategies. However, there needs to be a recognition that the GLA and relevant partners will need to work harder to get certain groups to feel the benefit – targeted effort is needed to get the fairness and equality we are striving for.

User:	London Borough of Harrow

The principles of this policy are welcomed. However, the policy should recognise that health outcomes are the result of a number of determining factors, including choices made by individuals. Those involved in planning and development can seek to ensure that healthy choices are available to individuals (i.e. walking and cycling) but cannot compel them to be more active and healthy

User:	London Borough of Harrow

The Council supports improved access to green spaces. Policies relating to open space should recognise that open space provision is not simply about the quantity of open space in an area, but also quality. In some instances it may be appropriate to allow for the loss of open space if this facilitates improved access and quality of provision.

User: London Borough of Wandsworth

The Council supports the policy statement as it explicitly makes reference to planning playing a critical role in helping to improve Londoners' health and reduce health inequalities. It also acknowledges the impact that areas of deprivation have on peoples' health outcomes. The Council requests that the Plan explains what 'wider determinants of health' as nonhealth professionals may not beware of what it means. In Section E, where it mentions "improved access to green spaces and the provision of new green infrastructure" we would suggest the addition of "access to good quality green spaces". Green space on its own will not deliver benefits if such spaces are not attractive or useable.

Involvement in arts and culture is proven to improve health outcomes, especially for the growing isolated elderly population and people with mental health issues. We recommend that culture should be specifically included in Policy GG3 as green space is.

User: London Borough of Richmond Upon Thames

The Council supports the overarching policy statement as it explicitly makes reference to planning playing a critical role in helping to improve Londoners' health and reduce health inequalities. It also acknowledges the impact that areas of deprivation have on peoples' health outcomes. The Council requests that the Plan explains what 'wider determinants of health' as nonhealth professionals may not beware of what it means. In Section E, where it mentions "improved access to green spaces and the provision of new green infrastructure" we would suggest the addition of "access to good quality green spaces".

Green space on its own will not deliver benefits if such spaces are not attractive or useable. Involvement in arts and culture is proven to improve health outcomes, especially for the growing isolated elderly population and people with mental health issues. We recommend that culture should be specifically included in Policy GG3 as green space is.

User: The Northbank BID

Chapter 1: Planning London's Future (Good Growth Policies) Policies GG 3, 5, 6

Increased support for health through an active lifestyle which is delivered through investment in streets and green spaces.

The Northbank BID area has a rich architectural heritage with grade 1 listed buildings, unique streetscapes and internationally renowned public spaces. We have worked with local stakeholdrs on a number of projects toimprove the quality of the streets: Aldwych and Villiers Street.

The Aldwych vision is an opportunity to unlock more and enhance the area at Somerset House, Kings College and the cluster of creative businesses. This in-turn would allow the area to develop an integrated community in one of London's busiest areas.

The area has a unique mix of arts, culture, education and law with diplomatic and civic functions combines with communities of local school, churches. The business community is particularly diverse with technology, financial sectors and hospitality industries well represented.

The Aldwych vision would enrich London with wide reaching benefits by linking specialist clusters and notable historic areas Temple, Royal Courts of Justice, Inns of Court, LSE & Kings College and Covent Garden and the
South Bank with Whitehall & Westminster to City of London. (connected routes and spaces). The River Thames is an up-tapped area for improvement and could be shaped for enhanced health, transport and biodiversity as well as an enhanced destination.

User:	Royal Borough of Greenwich

We are pleased to note the inclusion of the Healthy Streets Approach in Policy GG3 Creating a Health City as this remains a priority in the Royal Borough.

User: McDonald's Restaurants Ltd

10. Policy GG3: Creating a healthy city

McDonald’s shares the Mayor’s ambition to improve health outcomes, and reduce the inequality of health outcomes, in London. We are supportive of Policy GG3 and believe promoting informed choices and physical activity are key to improving health outcomes.
In line with our ambition to support the Mayor’s drive to tackle childhood obesity, we would draw attention to the following policy areas.

10.1 Reducing health inequalities and Promoting more active and healthy lifestyles

Over the past 15 years, McDonald’s has been proud partners with the four UK football associations: The English Football Association; The Scottish Football Association; The Football Association of Wales; and The Irish Football Association.

This partnership has seen us support over one million players and volunteers. In London since 2014, more than 1,000 people have attended our Community Football Days and we have distributed 3,328 kits to accredited teams in the Capital. Of the 171 McDonald’s restaurants within the M25, approximately 88 are twinned and actively supporting a local football club.

We do this work because increasing standards will ultimately create a better experience for young footballers, leading to increased participation and retention of children and young people in sport.

Our Community Football programme helps to increase participation at all levels. We remain absolutely committed to it and are in the final stages of planning our programme for future years.

10.2 Increasing availability of healthier food and restricting unhealthy options

- We are a committed to increasing availability of healthier food and have worked hard to improve the nutritional quality of our food.
- Between 2007 and 2015 we have removed 798 tonnes of saturated fat and 377 tonnes of sugar from our menu
- Since 2005, we have reduced the salt content across the menu by nearly 35%
- 90% of our menu items are under 500 calories
- In 2015, we served over 60 million portions of fruit and vegetables

McDonald’s has also joined an alliance of the largest out-of-home food and beverage brands in the UK to help tackle sugar reduction and other nutrients of concern. We have committed to achieving Public Health England’s sugar reduction target of 20% by 2020.

As well as improving the nutritional quality of our menu, we continue to lead the way in helping our customers make informed choices by working with experts to make to make healthier choices more prominent.

For example, simply by changing the ordering of drinks visible on our touchscreen kiosks, we’ve seen more people changing to Coke Zero over Coca Cola. We are also seeing significant increases in the number of Fruit Bags being sold in Happy Meals.

For over 30 years we have been providing nutritional information about our products. We were the first restaurant chain in the UK to provide calorie information on our menu boards in every one of our restaurants.

We recently rolled-out our new ‘Meals Under’ 400kcal and 600kcal bundles. Displayed clearly on our kiosks, our ‘Meal Under’ bundles bring together a main menu item, a drink and a side for breakfast, lunch or dinner. All achieve amber and green on the Food Standards Agency traffic light system for fat, saturated fat, salt and sugar.

We have a strong track record in reformulation and encouraging consumers to make healthier choices. We believe there are lessons from the changes we have made which can be shared with the wider industry – specifically A5 premises – in London. As outlined above, we would like to work with the Mayor through his Childhood Obesity Taskforce to share our best practice with other A5 premises in London and would like to explore how best to promote and enhance the Mayor’s Healthy Catering Commitment across the capital.

User:	Sheila Cave
Recommend an addition (in CAPS) to the following sentence: “Access to green and open spaces, including waterways AND TREES, can improve health, but access varies widely across the city.”	

User:	London Borough of Havering

The draft London Plan refers to the need for new buildings to be well insulated and sufficiently ventilated to prevent the health problems associated with damp/cold.

The draft London Plan should also highlight the importance of improving existing housing and making provision for renewable energy.

User:	Greenspace Information for Greater London CIC (GiGL)
GiGL response: we welcome this. There is an opportunity to include relevant ecosystem services here, as well as a commitment to reducing the areas of deficiency in access to nature and public open space.	

User: Gwyneth Whittle

I am very pleased indeed that you intend to include the many trees and Green Places which help to lighten the London streets in The New London Plan. As a member of the Woodland Trust I am very aware of the advantages to London as a whole, in the possession of so many trees, recreation grounds, allotments and grass verges, but I think your plan needs to be strengthened by the addition of some extra words, which I have printed in **BLOCK CAPITALS**

Recommendation: **Para 1.3.3** – Access to green and open spaces including waterways **AND TREES** as an issue in the amplification of negative impacts of large scale basement development.

User:	London Borough of Newham
LBN are supportive of this policy which is complementary to Newham’s Draft Revised Local Plan.	

User:	Kathryn Morton
Recommend an addition (in CAPS) to the following sentence: “Access to green and open spaces, including waterways AND TREES, can improve health, but access varies widely across the city.	

User: (FOE) Friends of the Earth England Wales and Northern Ireland

We strongly support Policy GG3 Creating a healthy city which sets out criteria those planning new development are expected to meet, to improve Londoners' health and reduce health inequalities.

Some aspects of the Plan, such as the sheer scale of development proposed and major infrastructure projects, such as Heathrow airport expansion (which we realise the Mayor opposes) and the Silvertown Tunnel are likely to make achieving the policy aspirations challenging. It is therefore crucial that healthy city criteria are clearly and consistently reflected in policies throughout the Plan if there is to be a possibility that they will be achieved in practice.

User: (FOE) Friends of the Earth England Wales and Northern Ireland

Criterion A "Ensure that the wider determinants of health are addressed in an integrated and co-ordinated way, taking a systematic approach to improving the mental and physical health of all Londoners and reducing health inequalities." There is a mismatch between the kind of homes that London needs and those that are built. As a result, commuting worsens and the city becomes more socially polarised. The London Plan should require range of size, types and tenures of housing to be provided which reflect identified needs. This will ensure a greater level of equity in housing provision. This means ensuring new homes are genuinely affordable to those on low and average incomes and built to high standards of design utilising sustainable building materials and techniques, energy and water conservation measures, and provision for refuse recycling. We believe that running costs, eg for water, energy and heating should be taken into account in defining what is affordable' and that all residential areas should have green spaces and sites of nature conservation value given their role in promoting mental and physical wellbeing. Addressing these matters will reduce health inequalities and achieve broader plan objectives, such as the commitment to building strong and inclusive communities set out in Policy GG1.

User:	(FOE) Friends of the Earth England Wales and Northern Ireland

Criterion B Promote more active and healthy lifestyles for all Londoners and enable them to make healthy choices This will require careful planning to maintain and improve access to a range of local facilities – jobs, homes, services, leisure, green space, preferably on foot but also by bicycle and public transport.

User:	(FOE) Friends of the Earth England Wales and Northern Ireland

Criterion C Use the Healthy Streets Approach to prioritise health in all planning decisions. We strongly support the Healthy Streets Approach which we note is carried forward in Policy T2. We consider the Plan could go further with regard to addressing the imbalance between land given over to private vehicles (cars, lorries) versus other uses in order to make London's streets "greener and more pleasant" including identifying further measures necessary for this.

User:	(FOE) Friends of the Earth England Wales and Northern Ireland

Criterion D Assess the potential impacts of development proposals on the health and wellbeing of communities, in order to mitigate any potential negative impacts and help reduce health inequalities, for example through the use of Health Impact Assessments. It is important that assessments consider air quality and measures needed to improve this and secure good air quality for all. The Plan could usefully reflect these points.

User:	(FOE) Friends of the Earth England Wales and Northern Ireland

Criterion E Plan for improved access to green spaces and the provision of new green infrastructure. Greening London is essential for people's health and wellbeing. As the Plan notes in paragraph 8.4.3 the creation of new green or open space will be essential in helping to meet the Mayor's target to make more than 50 per cent of London green by 2050.

User:	(FOE) Friends of the Earth England Wales and Northern Ireland

Criterion F Ensure that new buildings are well-insulated and sufficiently ventilated to avoid the health problems associated with damp, heat and cold. While this is essential, it is equally important to address shortcomings affecting London’s existing properties. Planning has a role to play through regeneration, refurbishment, retrofit and area wide programmes and the London Plan should reflect this. UK housing is amongst the worst in Europe in terms of cold, damp, leaky homes, leading to some of the highest levels of fuel poverty on the continent.

User:	(FOE) Friends of the Earth England Wales and Northern Ireland

Criterion G Seek to create a healthy food environment, increasing the availability of healthy food and restricting unhealthy options.
It is important that the Plan sets out clear policies covering land for food growing, both protecting existing land, eg allotments, and providing new land, in view of their benefits - access to healthy food, active lifestyles, addressing climate change - and contains policies which restrict unhealthy options, such as takeaways.

User:	Nicki Lang

Recommend an addition (in CAPS) to the following sentence: “Access to green and open spaces, including waterways AND TREES, can improve health, but access varies widely across the city.”

User:	John Innes Society

GG3 We broadly support these policies but object to G3 G unless “including and protecting and promoting allotment gardens” is added at the end of that policy.

User:	London Borough of Enfield - Public Health

LBE PH would however ask for caution in relation to:

- ‘Health impact assessments’ (HIAs) within the production of ‘good growth’. Whilst they can be useful the production of a HIA is often more useful than the end document itself. Also, it is unfeasible for a HIA to be undertaken for every development. The principles of ‘good growth’ should be integrated into planning with HIAs used for major developments.

User: TUC London, South East and East of England

Policy GG3: Creating a healthy city

1. The Plan correctly refers to the social and environmental causes of ill-health but fails to refer to the economic causes of ill-health, which are themselves evolving. Research shows that there has been a substantial increase in poor mental health, especially among younger persons, for whom gig employment is prevalent. And research shows a substantial increase in unhealthy workplace stress since 2008, and in stress associated with atypical working and gig economy working. If the London Plan reference the social and environmental factors, it should recognise the economic determinants, and respond to them where possible.
2. Travel to work times/commuting times are increasing in London. The London Plan should be cohesive with strategies to promote remote working, working from home and flexible working.

User:	Fiona Macdonald
Recommend an addition (in CAPS) to the following sentence: “Access to green and open spaces, including waterways AND TREES, can improve health, but access varies widely across the city.	

User: Mama Ujuaje

Change to read:

1.3.1 The health of Londoners is, to a large extent, determined by the environment in which they live. Londoners also shape that environment by how they are able to live. Transport, housing, education, income, working conditions, unemployment, air quality, green space provision and access, climate change and social and community networks can have a greater influence on health than healthcare provision or genetics. Many of these determinants of health can be shaped by an inclusive planning system, and local authorities are accordingly responsible for planning and public health.

1.3.2 The scale of London's health inequalities is great, and the need to reduce them is urgent. Healthy life expectancy is lower in more deprived areas, and the differences between parts of London is stark – more than 15 years for men and almost 19 years for women. London's ongoing growth provides an opportunity to reduce these inequalities, and delivering Good Growth will involve prioritising health in all London's planning decisions.

1.3.3 The causes of London's health problems are wide-ranging. Many of London's major health problems are related to inactivity. Currently only 34 per cent of Londoners report doing the 20 minutes of active travel each day that can help them to stay healthy, but good planning can help them to build this into their daily routine. Access to green and open spaces, including waterways, can improve health, but access varies widely across the city, so this will need to be regulated and improved by the creation of green opportunities as a part of all housing development and rehabilitation. Excessive housing costs or living in a home that is damp, too hot or too cold can have serious health impacts. A healthy food environment and access to healthy food is vital for good health. Good, inclusive, planning can help address all of these issues. Such planning means councils having to work alongside food sector expertise and communities and work across sectors in a joined up way.

1.3.4 The Healthy Streets Approach outlined in this plan puts improving health and reducing health inequalities at the heart of planning London's public space. It will tackle London's inactivity crisis, improve air quality and reduce the other health impacts of living in a car-dominated city by planning street networks that work well for people on foot and on bikes, and providing public transport networks that are attractive alternatives to car use. It will ensure that green spaces are more widely distributed across London and that their use can be productive, providing Londoners with the opportunity to grow food and be environmental stewards, providing for good mental health activity. It will also ensure that streets become more social spaces for all Londoners.

1.3.5 The social and environmental causes of ill-health are numerous and complex, and the people who are most affected by London's health inequalities tend also to be affected by other forms of inequality. Creating a healthy city with reduced health inequalities will make London fairer for everyone. The Mayor plays a pivotal role in bringing together a diverse range of stakeholders from service providers, boroughs, communities and the private sector in order to provide a more integrated approach to promoting a healthy city and reducing health inequalities. The Mayor will co-ordinate investment and
focus regeneration initiatives in those parts of London most affected by inequalities, including health inequalities.

GG3
To improve Londoners' health and reduce health inequalities, all those involved in planning and development, which includes community representation, must:

A. ensure that the wider determinants of health are addressed in an integrated and co-ordinated way, taking a systematic approach to improving the mental and physical health of all Londoners and reducing health inequalities.

B. promote more active and healthy lifestyles for all Londoners and enable them to make healthy choices. Developing Food Hubs which are centred on local food growing and development of integrated food trading places, provides a range of healthy and local economic and social activities across London

C. use the Healthy Streets Approach to prioritise health in all planning decisions.

D. assess the potential impacts of development proposals on the health and wellbeing of communities, in order to mitigate any potential negative impacts and help reduce health inequalities, for example through the use of Social and Health Impact Assessments.

E. plan for improved access to green spaces and the provision of new green infrastructure integrated into all new and rehabilitated developments.

F. ensure that new buildings are well-insulated and sufficiently ventilated to avoid the health problems associated with damp, heat and cold.

G. seek to create a healthy food environment, increasing the availability of healthy food and restricting unhealthy options by working closely with the food sector and communities to allow for more widespread awareness of the importance
of creating a more food secure city in terms of quality and quantity.

Narrative support for GG3, G:

1.3.6. A healthy food environment is underpinned by a London wide integration of the sub-systems which enable people of all classes, ages, genders and ethnicities to eat a diversity of healthy foods. This includes the knowledge systems which educate everyone on healthy eating practice.

Whilst this cannot be centrally controlled for, the Spatial Development Strategy (The London Plan) calls for a good understanding of London's food history and a systemic understanding of how people access food in way that supports their sovereignty, dignity, social cohesion and health. This should strongly inform how policies across the different sectors can support not only every Londoner's health, but also contribute to a thriving London economy and support a decentralised social infrastructure that embraces the other Good Growth policies in each sector.

This calls for a greater degree of inter-sectoral working on behalf of the different elements of the plan; housing, transport, heritage and culture, etc as well as by recognising the distinct nature of how each Londoner accesses opportunities for health and ensuring each sector supports this diversity.

User: Just Space

GG3: Creating a Healthy City

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

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

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

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

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

Changes to the policy:

Introduce new points:

- Reduce the need to travel by continuing to encourage development which contributes to lifetime neighbourhoods
- Not allow any new roads in the capital, and restrict any new river crossings to those reserved for public transport, walking and cycling.
- Widespread pedestrianisation of central London and local town centres, and provision of safe walking and cycling infrastructure along roads
- Ensure that new schools, care homes and hospitals are not built near main roads

- support and resource a community development approach to addressing health inequalities
- support social prescribing through protecting and enhancing existing community and social infrastructure

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

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

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

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

User:	Jill Henderson
Paragraph 1.3.3. Recommend an addition (in CAPS) to the following sentence: “Access to green and open spaces, including waterways AND TREES, can improve health, but access varies widely across the city.”	

User: Inclusion London

Policy GG3 Creating a healthy city

Pollution/breathing problems

Disabled people suffering from breathing problems/asthma have been given accommodation in town centre/junctions and roundabouts where pollution from traffic fumes is high. Accommodation away from main roads away from the risks associated with high levels of pollution is needed.

Recommendation: Disabled people with breathing problems are prioritised for accommodation in areas where the pollution is lower.

Sport and physical exercise

The draft London plan mentions that only 34% of Londoners report doing the 20 minutes of active 'travel' each day. Long hours on low pay with work venues that are too far to walk or cycle to, together with family responsibilities can combine to making it difficult to be involved in health giving physical activity on a daily basis. However, Deaf and Disabled people experience additional barriers, which prevent Sport or physical activity (SPA) which we detail under Policy S5 Sports and recreation facilities.

Mental health/welfare reforms

The government's welfare benefit reforms have had a negative impact on Deaf and Disabled people's mental health and wellbeing.This includes inaccurate assessments which deny people the benefits they entitled to and punitive benefit sanctions, which stop benefits for weeks or months.

Research by the Universities of Oxford and Liverpool has shown that suicides have increased due to the Work Capability Assessment (WCA) for Employment Support Allowance[1] (ESA) and collaborative study led by the University of York found that the effects of welfare sanctions and conditional support were "profoundly negative'.[2] Sanctions push Deaf and Disabled people further away from finding work. We have been contacted by Disabled people facing eviction from rented properties, or on the edge of losing their homes because of sanctions or inaccurate welfare benefit assessments causing delays in benefit receipt. As the Chair of the Public Accounts Select Committee said:

““It is an article of faith for the Department for Work & Pensions that sanctions encourage people into work. …..Suspending people’s benefit payments can lead them into debt, rent arrears and homelessness…”[3]

The need for low cost housing is even more urgent because of the impact of welfare benefit reforms. Sanctions should be abolished for Deaf and Disabled people and the current assessments for ESA and Personal Independence Payments (PIP) should end and be co-designed by Deaf and Disabled People’s Organisations (DDDPOs), based on the social model of disability.

We call on the Mayor and the London Plan to recognise the negative impact of welfare benefit reforms on the mental health of Deaf and Disabled Londoners and the increased need for low cost housing.

Recommendations:

- The London Plan recognises the increased need for low cost housing due to the impact of welfare benefit reforms.
- The Mayor calls on the government to end all welfare benefit sanctions for Deaf and Disabled people. Also that the current assessments for ESA and PIP are replaced by an assessment co-designed with Deaf and Disabled People’s Organisations, based on the social model of disability.
- In accordance with the UN Committee on UNCRPD’s recommendation[4] we ask the Mayor to call on government for a cumulative impact assessment with disaggregated data on the impact of welfare benefit reforms on Disabled people.

[1]http://jech.bmj.com/content/early/2015/10/26/jech-2015-206209

[2] https://www.york.ac.uk/news-and-events/news/2016/research/welfare-conditionality/

[3] https://www.parliament.uk/business/committees/committees-a-z/commons-select/public-accounts-committee/news-parliament-2015/benefit-sanctions-report- published-16-17/

[4] ‘(b) Carry out a cumulative impact assessment, with disaggregated data, about the recent and coming reforms on the social protection for persons with disabilities,:http://tbinternet.ohchr.org/_layouts/treatybodyexternal/Download.aspx?symbolno=CRPD/C/GBR/CO/1&Lang=En

User:	Federation of Small Businesses

We can look at the success of the London Healthy Workplace Charter. FSB London supports the work of the Charter – however, too few micro and small businesses are being accredited for recognition. We believe having an accreditation will make small firms an even more attractive environment for employees to work in, but small firms are put off by the time it takes to go through accreditation.

The Mayor should find ways through the Charter to make it a low bureaucratic process to receive an accredited Charter status.

User:	The Woodland Trust

Recommend an addition to the following sentence: ”Access to green and open spaces, including waterways **and trees**, can improve health, but access varies widely across the city.”

Our own research on the Woodland Access Standard (adopted by the Forestry Commission) indicates that access does indeed vary across the city. The latest data was published in *Space for People* last year, but the Trust can supply the data in GIS form if required. The health benefits of greater tree canopy are summarised in *Residential Developments and Trees*, but new evidence continues to emerge that widens our appreciation of such benefits, such as the “‘Urban Mind” project (http://proarbmagazine.com/new-research-conducted-kings-college-londonsuggests- trees-sky-birdsong-cities-beneficial-mental-wellbeing/).

User: Association for the Conservation of Energy

Policy GG3 Creating a healthy city

ACE welcomes the vision and principles Policy GG3. As outlined in our response to the Mayor's draft Environment Strategy, we agreed with the Mayor that the city's most pressing environmental challenge are harming Londoners' health and the city's economy, and that the current pace of change is too slow. The Mayor had highlighted in the strategy that big problems need ambitious responses. Therefore, we would like to see the Mayor's activity and focus on air quality continue, but also expanded in relation to improving the energy efficiency of buildings, improving the lives and reducing health inequalities of those households that are in fuel poverty, whilst supporting economic growth in the environmental goods and services sector.

As highlighted in the Mayor's draft Fuel Poverty Action Plan, there were an estimated 335,201 households living in fuel poverty in London in 2015. There is increasing evidence that living in a cold home is associated with poor health, including an increased risk of disease and death for all age groups. Health impacts include mental health issues, as well as respiratory and circulatory problems. Children living in cold, damp and mouldy homes are almost three times more likely than those living in warm homes to suffer from respiratory illnesses; this can also have a negative impact on educational attainment. It is estimated that there were between 1,300 and 4,000 deaths across London between 2011 and 2016 where the inability to heat homes adequately may have been a contributory factor. This is unacceptable, and action must be taken to improve the energy efficiency of homes across London.

User: My Fair London

We welcome the inclusion of a strong policy on health and health inequalities at the very beginning of the London Plan. We particularly welcome it’s focus on the wider determinants of health. As a key objective for the plan, and while noting that planning policy alone is not going to have much short-term impact on human health, given the Mayor is planning for the city over the next 20 years or more we are surprised to see that there is no monitoring target relating to health inequalities in **table 12.1** . There are many measures the Mayor could adopt – we would suggest that he commit to monitoring the gap in health life expectancy between the richest and poorest areas, and perhaps set a target to see this gap reduce by more than ten percent in each of the next two decades.

User: My Fair London

In paragraph 1.3.5 the Mayor states that causes of ill-health are numerous and complex. He is right on one level, but this also disguises some basic facts. The distribution of good or poor health in a wealthy society is largely driven by levels of economic inequality. The causal chains through which inequality causes harm are complex, but the fundamental cause and effect is relatively well understood.

In the 19th Century we were able to reduce cases of cholera in London, without any understanding of the microbiology or detailed causal pathways of the disease. Today we understand a great deal about how inequality causes harm. The harm flows from the size of the gap between rich and poor, and the size of gap has been rising because of increased incomes and wealth at the top of the distribution. Excessive income and wealth accumulation at the top of society is a public health problem, and must therefore be of fundamental concern to city planners. Policies that re-distribute wealth from the top across the income scale are the most direct, evidence based response to health inequalities. [My Fair London's response to the Mayor's draft Health Inequalities Strategy is available here: http://www.myfairlondon.org.uk/better_health_for_all_londoners]

User:	My Fair London

We would suggest that the Mayor seek to avoid use of the term ‘healthy lifestyles’ as shorthand for a desire to influence human behaviour. We would suggest this wording is replaced with ‘healthy lives’. As individuals our ability to make positive decisions that benefit our health is hugely constrained by the economic, social and physical environment in which we find ourselves. The notion of choice in human health is complex. The higher our status, the more recources and the more control we have over our lives, the easier it is for us to exercise any ‘choice.’ The lower our status, and the fewer resources we have, the harder it is for us to make long-term ‘choices’. See for example, Robert Perlman, ‘Socio-economic disparities in behaviour and health’, Jan 2018, https://evmedreview.com/socioeconomic-disparities-inbehavior- and-health/

User:	Rosalind Readhead

GG3 1.3.4 The Healthy Streets Approach outlined in this plan puts improving health and reducing health inequalities at the heart of planning London’s public space. It will tackle London’s inactivity crisis, improve air quality and reduce the other health impacts of living in a car-dominated city by planning street networks that work well for people on foot and on bikes, and providing public transport networks that are attractive alternatives to car use. It will also ensure that streets become more social spaces.

User:	London Healthier Places

This policy emphasises the health impacts of the built environment, wider determinants of health and health inequalities. The LHP Network supports this policy, in particular the proposed Healthy Streets Approach

The use of Health Impact Assessments can identify where major developments impact on health and health inequalities and recommend mitigation. HIAs should cover the construction phase as well as the masterplan and focus on both physical and mental health.

The LHP Network would like to see strengthened London-wide HIAs guidance to ensure consistency.

User:	NHS England

We would encourage the development of a universal set of ‘health indicators’ which can be used by local authorities when assessing applications for major developments.
The plan should also reflect the importance of loneliness, and social isolation, by encouraging ‘prosocial’ public spaces and lifestyles. Measures might include co-housing, extra-care facilities in accessible locations, non-commercialised public spaces, and other community facilities

User: Organiclea

3. HEALTH AND FOOD

We support the following changes to GG3 policies:

GG3: To improve Londoners' health and reduce health inequalities, **all those** involved in planning and development, **which includes community representation,** must:

- B. promote more active and healthy lifestyles for all Londoners and enable them to make healthy choices. **Developing Food Hubs which are centred on local food growing and development of integrated food trading places, provides a range of healthy and local economic and social activities across London**
- D. assess the potential impacts of development proposals on the health and wellbeing of communities, in order to mitigate any potential negative impacts and help reduce health inequalities, for example through the use of **Social and** Health Impact Assessments.
- E. plan for improved access to green spaces and the provision of new green infrastructure **integrated into all new and rehabilitated developments.**
- G. seek to create a healthy food environment, increasing the availability of healthy food and restricting unhealthy options **by working closely with the food sector and communities to allow for more widespread awareness of the importance of creating a more food secure city in terms of quality and quantity.**

These changes also need to be supported by the following changes in the narrative:

- 1.3.1 The health of Londoners is, to a large extent, determined by the environment in which they live. **Londoners also shape that environment by how they are able to live.** Transport, housing, education, income, working conditions, unemployment, air quality, green space provision and access, climate change and social and community networks can have a greater influence on health than healthcare provision or genetics. Many of these determinants of health can be shaped by an inclusive planning system, and local authorities are accordingly responsible for planning and public health.

- 1.3.3 The causes of London’s health problems are wide-ranging. Many of London’s major health problems are related to inactivity. Currently only 34 per cent of Londoners report doing the 20 minutes of active travel each day that can help them to stay healthy, but good planning can help them to build this into their daily routine. Access to green and open spaces, including waterways, can improve health, but access varies widely across the city, **so this will need to be regulated and improved by the creation of green opportunities as a part of all housing development and rehabilitation.** Excessive housing costs or living in a home that is damp, too hot or too cold can have serious health impacts. A healthy food environment and access to healthy food is vital for good health. Good, **inclusive,** planning can help address all of these issues. **Such planning means councils having to work alongside food sector expertise and communities and work across sectors in a joined up way.**
- 1.3.4 The Healthy Streets Approach outlined in this plan puts improving health and reducing health inequalities at the heart of planning London’s public space. It will tackle London’s inactivity crisis, improve air quality and reduce the other health impacts of living in a car-dominated city by planning street networks that work well for people on foot and on bikes, and providing public transport networks that are attractive alternatives to car use. **It will ensure that green spaces are more widely distributed across London and that their use can be productive, providing Londoners with the opportunity to grow food and be environmental stewards, providing for good mental health activity.** It will also ensure that streets become more social spaces **for all Londoners.**
- **1.3.6. A healthy food environment is underpinned by a London wide integration of the sub-systems which enable people of all classes, ages, genders and ethnicities to eat a diversity of healthy foods. This includes the knowledge systems which educate everyone on healthy eating practice. Whilst this cannot be centrally controlled for, the Spatial Development Strategy (The London Plan) calls for a good understanding of London’s food history and a systemic understanding of how people access food in way that supports their sovereignty, dignity, social cohesion and health. This should strongly inform how policies across the different sectors can support not only every Londoner’s health, but also contribute to a thriving London economy and support a decentralised social infrastructure that embraces the other Good Growth policies in each sector. This calls for a greater degree of inter-sectoral working on behalf of the different elements of the plan; housing, transport, heritage and culture, etc as well as by recognising the distinct nature of how each Londoner accesses opportunities for health and ensuring each sector supports this diversity.**

User:	NHS England

It would be useful to prioritise safe and accessible active travel routes (e.g. cycle lanes, walking routes, etc). These should be prioritised throughout the Greater London area, including suburban areas. This would promote active travel in London’s outer boroughs and not just central London.

User:	NHS England

Planning and regeneration can play a key role in developing healthy towns and communities, and offer a unique opportunity to bring together health and regeneration. The choices made now will influence the behaviours and independence of future generations, for example access to green spaces, including cycle paths, good transport networks which could assist in reducing car use and encouraging physical activity.

Additionally poor air quality has a negative impact on health across all ages, particularly for those with heart and lung conditions. Therefore, promoting active travel will also assist in reducing air pollution.

User:	NHS England

Infrastructure planning should take into consideration availability of open and good quality green spaces that can enhance wellbeing outcomes for all ages, and especially those of children. It is important that there is provision and maintenance of play/exercise equipment for all ages, activation and promotion of using assets, route finding/waymarking from local residential areas to increase engagement with green spaces and green infrastructure. It is also important that consideration is given to having green streets outside formal parks and green space (e.g.. trees, verges). Additionally, safe child friendly green spaces will promote public confidence and encourage families and carers to use these.

User:	NHS England

Evidence suggests that minor indoor interventions can have a positive health impact particularly for vulnerable groups, such as those with existing health conditions (e.g. children with asthma and those with cardiovascular conditions) and people with poor mobility. Therefore it is important that along with adequately heated homes, the indoor environment in social and affordable housing also enhances overall wellbeing (e.g. reduces risk of falls or installation of smoke alarms to reduce risk of injury through fire).

User:	NHS England

It may be useful to consider environmental factors other than food outlets that could have adverse effects on health, such as the clustering of low cost alcohol retailers, gambling and bookmakers, etc, particularly in areas of high deprivation.
Additionally it would be useful to promote healthier choices in public and private buildings through vending machines which encourage consumption of low sugar and low saturated fat food and drinks.

User:	Wood, Hall & Heward Ltd

makes no mention of the benefits of shifting freight/goods transport from road to rail or water in terms of reduced pollution and congestion and improved air quality.

User: Revo

Entrenching health and wellbeing as a key outcome for the city's continued growth is welcome and we agree it is an integral part of creating sustainable places and thriving community. This should include accessibility and inclusivity as a thread, and we support a further focus on the social value of the built environment and its contribution to London society in the widest possible sense.

Further detail is needed on how the Mayor plans to implement and support this approach in future policy and must be done in partnership with other key stakeholders. We would also envisage this joined-up approach with key stakeholders across the spectrum in both the public and private sectors would be required to achieve these goals. They cannot be achieved by any one sector alone nor should overall responsibility be placed on one sector given communities stretch beyond the parameters of the buildings in which people live, work, and play.

This joined-up approach should also reach across Borough boundaries to have maximum impact and local authorities should be encouraged to work together to leverage positive investment, and this should also be reflected in their engagement with development partners.

Further clarity is sought on how a 'Healthy Streets Approach' to prioritise health in all planning decisions (GG3(C)) would be applied and any policy test which must be met (and the criteria for such) to ensure the potential impacts of this initiative on the logistical and financial viability of development proposals is right and just.

We agree with other industry bodies that there remains a discord between the aspirations of the GLA and many local authorities (particularly Outer London boroughs) when it comes to reducing car use and ownership and we would therefore encourage whether greater guidance and / or evaluation can be provided in this regard.

We support improved access to green space and public realm as a central aspect of creating a healthy, vibrant city.

User:	Doosan Babcock

Comment on 1.3.4:

We are supportive of an approach which tackles air quality issues in relation to road transport. We have highlighted later our response support for approaches which also tackles emissions from buildings as part of an overall approach in delivering better air quality.

User: London NHS Clinical Commissioning Group

Policy GG3 Creating a healthy city

We support policy GG3 which sets out a clear and over-arching approach to health and wellbeing that recognises that many of the determinants of health are influenced and shaped by the planning system. The supporting text (paragraph 1.3.2) recognises that health inequalities in London are significant and persistent highlighting variations in life expectancy across London. It would be help if the paragraph also referred to inequalities that existing between and within boroughs, which is illustrated in Figure 2.19 which designates Strategic Areas for Regeneration based on 20 per cent most deprived lower super output areas in England. Supporting text could also recognise the role of Opportunity Area Planning Frameworks, estate regeneration and town centre renewal schemes to tackle health and other related inequalities.

Access to healthcare services and infrastructure is a vital component of a healthy city. To recognise this and cross-reference to Policies S1 and S2 we suggest that an additional clause H is added to read ‘Ensure the provision of sufficient and fit for purpose health infrastructure to meet the needs of the changing and increasing population’.

We suggest that a new paragraph is added to the supporting text to reflect the need for investment in health infrastructure to deliver health care and to support the well-being of residents, and those who work, visit and study in London. With an ageing population, and an increase in the number of people with complex and long-term health conditions, together with higher housing densities and environmental challenges, the plan plays an important role in ensuring that modern health facilities are provided in the appropriate locations to best serve communities, and to make efficient and effective use of resources.

Paragraph 1.3.3 recognises that many of London's major health problems are related to inactivity. Policy GG3 focuses on four determinants: Healthy Streets - active travel and air quality (clause C); access to green and open space (clause E); poor housing (clause F); and healthy food environment (clause G). It would be helpful if the policy or supporting text provided cross-references to the other policies which address these determinants and to other policies which will help create a healthy city, for example access to services (Policies S1-S5) and good and inclusive design (Policies D1-D5). It should also be recognised that many policies which seek to improve physical health will also improve mental health, but in general more emphasis could be given to mental health as a major health issue facing London. Paragraph 4.15.9 refers to dementia, but in the context of dementia care and accommodation. The detailed design of neighbourhoods is very important for both physical and mental health and as such Policies GG1 and Policies D1 and D3 on inclusive design and inclusive places are critical to ensure that the needs of disabled and older people are addressed.

It would be helpful if the supporting text also referred to the NHS England Healthy New Towns initiative as emerging good practice to create new communities promoting health and wellbeing and securing high quality health and care services. Barking Riverside is the demonstrator site in London, where ten healthy planning principles have been embedded into planning process and new infrastructure will enable the delivery of a new model of health and social care.

We note that clause D of the policy requires the health and wellbeing impacts of development proposals to be assessed and refers to the use of health impact assessments (HIA). However, to ensure that the clause is implemented, we suggest that the requirement for HIA is strengthened.

We suggest that clause D is reworded to read:

'Use Health Impact Assessments to assess the potential impacts of major development proposals on the health and well-being of communities in order to mitigate any potential negative impacts and maximise the potential positive impacts including reducing health inequalities and improving overall health and well-being'.

This would acknowledge the role of HIA in helping to implement Policy GG3. In 2017, 106 planning applications were referred to the Mayor which included residential use (excluding variations and amendments). Of these, 19 (18%) included a HIA and 47 included an Environmental Impact Assessment where the impact on health services was assessed as part of the Environmental Statement. 16 HIAs were undertaken on planning applications which included 150 or more residential units and all applied the HUDU HIA tools. The majority of boroughs planning application validation lists require an HIA to be submitted with a major planning application including residential use, although the residential unit threshold varies.

At present, there is no supporting text which refers to HIA or its relationship with other assessment processes. We suggest that a new paragraph is inserted to read:

“Where a development proposal is anticipated to have significant implications for people’s health and wellbeing, a health impact assessment should be prepared to mitigate any potential negative impacts and maximise the potential positive impacts. To be effective, an HIA should be undertaken as early as possible in the planning application process, at the pre-application stage or when a development brief is being prepared. When preparing Local Plans, boroughs should address the health impacts of policy issues and options and should consider integrating HIA into Strategic Environmental Assessment, Sustainability Appraisal, or Integrated Impact Assessments to ensure that that the wider determinants of health are addressed in an integrated and co-ordinated way in line with clause A of the policy. Further guidance to support the implementation of the policy will be prepared.”

The current Social Infrastructure SPG (May 2015) provides guidance on the role of HIAs and the use of different HIA tools and approaches that could be used, depending on the scale of development. We would welcome the opportunity to contribute to the preparation of new or revised guidance, which could also capture good and emerging practice.

Whilst HIA provides a useful tool to assess the impact of individual developments, over a third of housing growth identified in the London Plan is to be delivered on small sites of up to 25 dwellings, and as such there is a risk that the cumulative impact of smaller developments on health and wellbeing will not be adequately addressed. This raises the importance of integrating health and wellbeing into neighbourhood plans, area action plans and development briefs for smaller sites.

User:	British Takeaway Campaign

It is important to remember that takeaways do not just pack a huge economic punch – they also play a key role in regenerating high streets, and are mainly small businesses and local employers. The draft London Plan is right to focus on enabling Londoners to make healthy food choices. The principle of educated consumer choice is central to the BTC's approach to encouraging healthy lifestyles, and takeaways are taking considerable steps to support Londoners in making better food choices. These include offering healthier menu options, reformulating products and adapting cooking methods, and providing more information to their customers.

The sector has a strong track record in providing healthier menu options. Indeed, 96% of takeaway restaurants offer vegetarian options, and 73% offer small portion sizes. Low fat options are available in 65% of restaurants, while low salt alternatives are available in 59%. Takeaway restaurants therefore play a valuable role in offering the choice and variety that customers want – with grilled chicken kebabs and salad, as well as the growth in Portuguese chicken and stir fry dishes, evidence of this.

Embracing different cooking techniques is also an important part of this. There are now examples of restaurants offering low-fat versions of favourite options, such as fish, chips and burgers – for example by air-frying them. The use of different methods is being actively encouraged across the sector. For example, a 2016 report, Does Size Matter, by Enjoy Fish and Chips – supported by BTC member the National Federation of Fish Friers – advises fish friers how to achieve the lowest values for energy, fat, saturates, trans-fatty acids and salt. Friers are advised to use cod or haddock, with thin, light batter, and rapeseed oil and to ensure it is cooked at the optimal temperature. A medium sized piece of cod prepared in this way contains 234 calories and 1.2g saturated fat per 100g. As further examples, Calowries in Putney air fry their chips and chicken nuggets to provide a range of low calorie dishes, while Eat Fit Food in Holloway offers oil free dishes which are low in fat.

Furthermore, takeaway restaurants are increasingly providing more information to their customers.
Kichn in Islington, for example, provides the calorie, saturated fat, protein and carbohydrate information for their dishes, while the National Federation of Fish Friers encourages the use of standardized portion size names so customers know what to expect.

The BTC agrees that those involved in planning and development should encourage a healthy food environment in order to promote health living. However, we believe an approach centred on restricting consumer choice would attempt to tackle the problem in the wrong way. With takeaway restaurants increasingly offering healthy options on their menus, efforts should be primarily focused on how to facilitate informed decision making by Londoners. That is why the BTC is calling for the Government to provide online calorie calculators in order to help smaller businesses empower customers to make informed choices.

We understand that the Healthier Catering Commitment can help smaller restaurant businesses understand the steps they can take to increase the healthiness of the meals they serve. Just Eat, a BTC member, which partners with over 5,400 largely independent restaurants in London, has committed to communicating the Healthier Catering Commitment to its restaurant community this year to support local authorities in engaging takeaways on this important matter. While many takeaway restaurants already comply with the Healthier Catering Commitment, we acknowledge we can play a role in helping to reach restaurants that need additional support.

Just Eat has also joined forces with Shift, a charity which uses research and design techniques to create products and services which help address social problems. Alongside six other organisations (Esmee Fairbairn Foundation, Guys and St Thomas' Charity, Mark Leonard Trust, Tower Hamlets Council, Hackney Council and Birmingham City Council), Just Eat and Shift have created the Better Fast Food Network to understand the challenges faced by independent fast food outlets and support them to gradually and sustainably improve the healthiness of the meals they serve.

Shift will be undertaking work with and on behalf of these organisations over a period of two years to develop financially sustainable ways to improve the healthiness of the UK’s fast food before setting up a stand-alone organisation that will oversee this work into the future.

User:	British Takeaway Campaign

"The BTC agrees that those involved in planning and development should encourage a healthy food environment in order to promote health living. However, **we believe an approach centred on restricting consumer choice would attempt to tackle the problem in the wrong way.** With takeaway restaurants increasingly offering healthy options on their menus, efforts should be primarily focused on how to facilitate informed decision making by Londoners. That is why the BTC is calling for the Government to provide online calorie calculators in order to help smaller businesses empower customers to make informed choices."

Please see full PDF for more detail

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(Please see PDF for full detail)

User:	Mr Jon Halse

Paragraph 1.3.3. Recommend an addition (in CAPS) to the following sentence: “Access to green and open spaces, including waterways AND TREES, can improve health, but access varies widely across the city.”

User: British Property Federation

The emphasis placed on health and wellbeing as a key outcome from the capital city's continued growth is welcomed as an integral part of creating sustainable places. Further detail is however needed on how this will be implemented in an integrated and coordinated way. The built environment undoubtedly plays a central role in the health of Londoners, however a joined-up approach to improving wellbeing is required, with both public and private sector working together to achieve this goal. Whilst the development industry plays an important role in creating a healthy and sustainable built environment, communities stretch beyond the parameters of the buildings and the spaces surrounding them, in which people live, work, and relax. In some circumstances, this means that providing the requisite infrastructure to encourage healthy lifestyles lies beyond the remit and capabilities of an applicant or developer. Where this is the case, we therefore encourage the provision of measures to encourage local authorities to plan and deliver the required health-related infrastructure in line with the timescales associated with development projects. This should also apply across local authority boundaries to further encourage a joined-up approach and could take the form of joint reviews into infrastructure funding and delivery. One such study was undertaken into the Upper Lee Valley Opportunity Area in 2015[1].

Whilst we acknowledge that the health and lifestyle-related impacts of proposed development should be considered as part of all planning decisions, further clarity is sought on the following statement within the draft plan – '*Use the Healthy Streets Approach to prioritise health in all planning decisions'.* Whilst the Healthy Streets Approach set out in the draft plan is a step in the right direction; as with all new policy, the potential impacts of this initiative on the logistical and financial viability of development proposals must be carefully considered. Namely, if the Healthy Streets Approach is to become a policy consideration, some consistency will need to be provided across local authorities, particularly with regard to policies and guidance around car parking provision and car usage. Whilst the Mayor's emphasis on reducing the dominance of private vehicles is wholly welcome, there remains a discord between the aspirations of the GLA and many local authorities (particularly Outer London boroughs) when it comes to reducing car use and ownership. Consideration should also be given to the extent of which tangible improvements can be made as part of a development proposal.

We are encouraged that the Mayor is acknowledging the need to plan for improved access to green space as a central aspect of creating a healthy city. Green spaces and new green infrastructure are important components of creating great places. We would encourage the Mayor and his team to engage with the BPF's recently launched Great Places Campaign launched in October 2017. The campaign seeks to bring the real estate sector together to discuss and eventually achieve the provision of quality spaces, homes, workspaces, and neighbourhoods. Green space and green infrastructure can and will play an important role in this aspiration. Through round table discussions, large-scale industry events, associated materials, and collaboration with local and central government we hope to help London achieve and understanding of what a great place looks and feels like.

[1] Steer Davies Gleave et al. (2015). Upper Lee Valley Development Infrastructure Study - https://goo.gl/rmgPXW

User:	Ruth Tattum
Paragraph 1.3.3. Recommend an addition (in CAPS) to the following sentence: “Access to green and open spaces, including waterways AND TREES, can improve health, but access varies widely across the city.”	

User:	Brethren's Gospel Trusts

SUPPORT – We welcome the positive recognition of the diverse health determinants including social and community networks and the need for this to be recognised by local authorities. Reduction of existing health inequalities is an urgent objective and prioritising health in all London’s planning decisions is to be welcomed. This reflects the advice of Chapter 8 of the NPPF. The policy should explicitly include the special needs of the ageing population and disabled people.

User:	London Wildlife Trust

We welcome and support this policy, but suggest Part E is amended to:
E Plan for improved access to green spaces and the provision of new **health-benefiting** green infrastructure.

User:	London Wildlife Trust

In para 1.3.3 there needs to be stronger reference to quality of greenspaces, as this has a relationship to their ability to contribute to health and wellbeing.

1.3.3 The causes of London's health problems are wide-ranging. Many of London's major health problems are related to inactivity. Currently only 34 per cent of Londoners report doing the 20 minutes of active travel each day that can help them to stay healthy, but good planning can help them to build this into their daily routine. Access to green and open spaces, including waterways, can improve health, but access **and quality** varies widely across the city. Excessive housing costs or living in a home that is damp, too hot or too cold can have serious health impacts. A healthy food environment and access to healthy food is vital for good health. Good planning can help address all of these issues

User:	Town and Country Planning Association

The TCPA welcomes the strategic aim to create a healthy city and associated policies including healthy streets and restricting the proliferation of unhealthy food outlets. Through its *Reuniting Health with Planning**[1]*** initiative, the TCPA will continue to advocate strong regional and local planning policies to deliver health outcomes.

[1] TCPA Reuniting health with planning work https://www.tcpa.org.uk/Pages/Category/health

User: Apex Airspace Development

We welcome that the new London plan has acknowledged the impact that the urban environment has on peoples mental and physical health. Our unique approach allows the expansion of existing communities across the capital reducing the impact on the local environment .

A further point on health is it removes the inconveniences and detrimental effects of living next to a construction site. Traditional methods of construction can cause amongst others, noise pollution, dust, anxiety. All of which can lead to mental health problems in already vulnerable people. By using a prefabricated model where the construction process is managed within a factory these potential issues are removed from the process.

User: Town and Country Planning Association

Healthy environments and wider social infrastructure

3.8.1 The TCPA supports the draft London Plan's strategic objective and approach to ensure plan-making and planning decisions address wider environmental determinants of people's health and wellbeing.

Policy GG3 Creating a healthy city

3.8.2 The TCPA supports GG3 as one of the Good Growth policies and commends the Mayor in putting outcomes for people and communities from the planning process above purely financial and economic outputs. This policy will act as a strategic reference point for all policies to ensure developments across London will contribute to it being a healthy city. It believes that GG3(A) should be re-drafted to form part of the opening sentence with (B) to (G) presented as mechanisms to achieve integration of the wider determinants.

3.8.3 The TCPA believes the Mayor can go beyond the draft policy and maximise the use of his powers and duties to have a more strategic and oversight role of both the cumulative influence of local planning policies and decisions across Boroughs with their statutory Joint Health and Wellbeing Strategies (JHWS). In its submission to the draft London Health Inequalities Strategy the TCPA highlighted its research conducted on behalf of the London Healthy High Streets Group in 2015 of all London Boroughs' adopted and emerging local plans in 2015 in relation to health and wellbeing and the NPPF policies[i]. The findings are surprising in two aspects. Firstly, most if not all Borough local plans have policies with potential to promote healthy places and help reduce health inequalities, however, secondly, they all miss the opportunity to link up with health priorities set out in the JHWS evidenced by the JSNA or implemented with specific health outcomes in mind. TCPA reiterates the recommendation that GLA works to ensure greater alignment between local plans and JHWSs, and puts in place a monitoring process to cumulatively identifies local planning policies on healthy environments as part of its Annual Monitoring Report similar to the methodology of the TCPA's research.

3.8.4 The TCPA believes, similar to the approach taken to deliver design quality in Policy D2, considering health inequalities and promoting measures to improve wellbeing should take a life course approach. Many of the determinants of health will be already be determined by the location and siting of proposed development sites even before any masterplanning is undertaken, and therefore Boroughs should be encouraged not just to health proof planning decisions, such as use of HIAs, they should be required to consider health when identification development sites and developing site-specific policies. Where sites are considered to be unsuitable due to a lack of health promoting infrastructure, such as healthy food environment or sustainable transport options, Boroughs with land promoters should set out measures in site allocations policies to ensure making provision for such infrastructure will be integral to future planning applications process. The TCPA sets out potential areas of focus in Section 4 of its guide 'Creating health promoting environments'[ii].

3.8.5 In summary the TCPA supports Policy GG3 with a recommendation to strengthen the policy with further guidance as outlined.

[i] TCPA, Policy Review of Borough Local Plans and Joint Health and Wellbeing Strategies, 2015, for the London Healthy High Streets Group and Merton Council

[ii] TCPA, Practical Guides for Creating Successful New Communities. Guide 8: Creating Health-Promoting Environments, December 2017

User: Canal & River Trust

The Trust welcomes the recognition of the role that waterways can play in improving health (para 1.3.3). However, it is unclear whether this is carried forward into policy GG3 because of the lack of clarity about the scope of the Healthy Streets initiative and the definition of Green Infrastructure used in the plan.

Policy GG3 embeds the Healthy Streets approach into this strategic policy. Whilst we support the overarching intentions of the Healthy Streets approach, the Trust considers that by focusing exclusively on streets (as appears to be the intention in policy T2 and its supporting text), opportunities will be lost to create attractive, mixed use, sustainable travel routes that use off-road spaces such waterway towpaths and parks, for example. We have commented in detail on the Healthy Streets approach in response to the Draft Mayor's Transport Strategy and we return to this issue below.

Policy GG3 does also require that those involved in planning and development 'plan for improved access to green space and the provision of green infrastructure'. However, the definition of 'green infrastructure' in the plan does not include waterways. We suggest amendments below to address this.

We agree that access to waterways varies across the city (para 1.3.3). This is not simply due to variations in distance but is also impacted by variations in quality of access. The quality of their environments also varies. Policy SI16 recognises the case for improvements to waterway access and towpaths / riverside paths. To ensure consistency between it and this cross-cutting policy, we suggest that point E of GG3 is redrafted to state:

"Plan for ~~improved~~ improvements to access to, and the quality of, green and blue spaces
and the provision of new green and blue infrastructure".

User:	London Environment Directors' Network (LEDNet)

Policy GG3 Creating a healthy city

D Assess the potential impacts of development proposals on the health and wellbeing of communities, in order to mitigate any potential negative impacts and help reduce health inequalities, for example through the use of ~~Health~~**an Integrated** Impact Assessment~~s~~ **process that incorporates key aspects of a Health Impact Assessment into a Sustainability Assessment and Strategic Environmental Assessment.**

User:	Moorfields Eye Hospital NHS Foundation Trust & UCT Institute of Opthalmology

Policy GG3 Creating a healthy city seeks to improve Londoners' health and reduce health inequalities through various means including by ensuring that the wider determinants of health are addressed in an integrated and co-ordinated way, taking a systematic approach to improving the mental and physical health of all Londoners and reducing health inequalities.

We strongly support the aims of this policy. As set out above, Moorfields and UCL together are the world leaders in ophthalmology. The benefits to Londoners health are significant by the presence and collaboration of these two organisations. This is under significant threat from fundamental defects in the current estate. To ensure London continues to benefit from the successes of these organisation, they must move to new and improved facilities.

User: 313-349 Ilderton Road LLP

Policy GG3 Creating a healthy city seeks to improve Londoners' health and reduce health inequalities.
We support the principle of the policy but request further clarification on the requirements of Health Impact Assessment and its role within the planning system. This type of Assessment could prejudice the delivery of much needed housing and employment development where this creates an onerous and ambiguous burden upon the developer.

User: Benhill Residents

This policy should specifically refer to health inequalities that relate principally to income levels.1 It is incredibly patronising to suggest that monitoring of the numbers of Londoners engaging in active travel (KP1) is realistic measure of improvements health inequalities. If the Mayor is serious about creating a healthy city, health inequalities need to be more carefully considered within a range of policies in the London Plan, not just those about encouraging more people to cycle.

Given that poor quality and overcrowded housing is one of the key determinants of poor health (in addition to income inequality) the Mayor should have a policy that actively require boroughs to set targets for achieving better conditions in the private rented sector and on gypsy and travellers' sites and also on addressing overcrowding (which are most prevalent in areas of 'deprivation').

The detrimental impacts of regeneration / gentrification, particularly on older people (either for those displaced but for those remaining) includes loss of strong and supportive neighbours and wider community networks and the stresses (sometimes for years) of potential loss of a home, local shops, services and amenities. It should be noted that connections within physical neighbourhood communities are much more important to lower-income communities than those who are
wealthier. The Plan needs to acknowledge this.

1 NB New data out from the Longevity Science Panel finds the gap in life expectancy between the richest and poorest in England has increased from 7.2 years in 2001 to 8.4 years in 2015. People over 60 in the bottom 20% had death
rates around 50% higher than the top 20% in 2001; by 2015, the difference had risen to 80% (www.bbc.co.uk/news/health-43058394). The report authors 'said income inequality was the biggest factor'. More research today from the Literacy Trust shows huge gaps in life expectancy between districts with the lowest and highest levels of literacy: a boy born in Stockton town centre is expected to die 26 years earlier than one born in north Oxford: https://literacytrust.org.uk/research-services/research-reports/literacy-and-life-expectancy/

This follows on from findings by Public Health England last month that overall life expectancy has stalled since 2010 and has started to fall in certain areas, which is apparently 'unprecedented in peacetime': www.thetimes.co.uk/article/lifeexpectancy-falls-by-a-year-in-several-regions-of-england-prwcdgzvl. This might be down to austerity, or continued postindustrial deprivation. What the research literature generally finds is that once a certain minimum material threshold is passed it's inequality that effects health rather than material deprivation: the psychological effect of being at the bottom of the pile or having no control over your life.

User: Elaine Chambers

GG3 Creating a healthy city

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The detrimental impacts of regeneration / gentrification, particularly on older people (either for those displaced but for those remaining) includes loss of strong and supportive neighbours and wider community networks and the stresses (sometimes for years) of potential loss of a home, local shops, services and amenities. It should be noted that connections within physical neighbourhood communities are much more important to lower-income communities than those who are wealthier. The Plan needs to acknowledge this.

User: Royal London

Policy GG3 – Creating a healthy city

RL are supportive of the objectives of this policy, however we are concerned in relation to the potential request and presumed responsibility for applicants to provide Health Impact Assessments in support of development proposals. Any planning application submitted includes a range of technical documents covering a range of clear and understood topics and key development considerations depending on the scale of development proposed. RL understand and take this responsibility to clearly and comprehensively present their proposals seriously.

In recent times however, the number of documents required at the planning stage has exponentially grown and in many cases rather than benefiting the planning process these simply introduce a level of complexity and cost which is unhelpful and unnecessary. It is our repeated experience that such technical documents are often not read or reviewed following submission with conditions often attached to permissions which repeat a requirement for the information provided at application stage within these documents.

We would suggest that officers and decision makers should be able to assess an application in relation to this topic through reviewing the extensive application documentation already required. The London Plan is a strategic document and therefore a potential prescriptive requirement to provide a poorly defined document is unhelpful and together with other requirements can be seen to overburden applicants and make the planning process unduly complicated and costly when advancing proposals at risk.

User:	Reigate and Banstead Borough Council

Policy GG3: Creating a Healthy City is supported. The Reigate and Banstead area is partially provided for in terms of critical care and emergency services from locations within Greater London.

User: Earls Court Public Sector Tenants' Assoc

This policy should specifically refer to health inequalities that relate principally to income levels.[1] It is incredibly patronising to suggest that monitoring of the numbers of Londoners engaging in active travel (KP1) is realistic measure of improvements health inequalities.

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The detrimental impacts of regeneration/ gentrification, particularly on older people (either for those displaced but for those remaining) includes loss of strong and supportive friends and wider community networks and the stresses (sometimes for years) of potential loss of a home, local shops, services and amenities. It should be noted that connections within physical neighbourhood communities are much more important to lower-income communities than those who are wealthier. The Plan needs to acknowledge this.

[1] NB New data out from the Longevity Science Panel finds the gap in life expectancy between the richest and poorest in England has increased from 7.2 years in 2001 to 8.4 years in 2015. **People over 60 in the bottom 20% had death rates around 50% higher than the top 20% in 2001; by 2015, the difference had risen to 80%** (www.bbc.co.uk/news/health-43058394). The report authors 'said income inequality was the biggest factor'. More research today from the Literacy Trust shows huge gaps in life expectancy between districts with the lowest and highest levels of literacy: a boy born in Stockton town centre is expected to die 26 years earlier than one born in north Oxford: https://literacytrust.org.uk/research-services/research-reports/literacy-and-life-expectancy/

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User:	Living Streets

We support policy GG3 and strongly support the following:

• “A ensure that the wider determinants of health are addressed in an integrated and co-ordinated way, taking a systematic approach to improving the mental and physical health of all Londoners and reducing health inequalities”

• “B promote more active and healthy lifestyles for all Londoners and enable them to make healthy choices”

• “C use the Healthy Streets Approach to prioritise health in all planning decisions”.

User:	Orbit

Orbit support the principle of ensuring that development positively affects health and community wellbeing. However, assessing the potential impacts of development proposals on the health and well-being of communities can, in practice, be difficult to quantify and measure.

The requirement for applications to be accompanied by a Health Impact Assessment has the potential to be overly onerous, particularly given the scale of other planning application documents that are required.

Orbit welcomes further guidance on the requirements of Health Impact Assessments.

User:	Frances High
Paragraph 1.3.3. Recommend an addition (in CAPS) to the following sentence: “Access to green and open spaces, including waterways AND TREES, can improve health, but access varies widely across the city.”	

User:	PAFH - Physical Activity for Health (London Sport)

We strongly support policy areas GG3 A/B/C/E, but suggest it is important to acknowledge that physical activity consists of more than just active travel as described in statement 1.3.3

User: Natalya Palit

Policy GG3D only requires those involved in development to ‘assess’ the potential impacts of development on health and well-being, however it is not clear how much, if any weight should be given to these assessments. Health Impact Assessments are already in place in some boroughs, but often little, if any weight is given to these, and the Mayor should consider how these could be more deeply embedded into the development process. For example, it could become a validation requirement for any GLA referable applications, to emphasise to developers its importance right from the outset, in a similar manner to how high-level in principle information on sustainability and other key issues are currently requested from the outset.

In order to enable improved access to open space to be planned for adequately, boroughs should be required to keep their open space evidence up-to-date. Consideration could be given to capitalising on technology and open data to enable this to be kept up to date in the interim between formal assessments which are undertaken by external consultants.

User:	The Forestry Commission
There is a vast amount of evidence showing how the urban forest improves health and wellbeing for all ages. The Green Cities:Good Health resources provide an excellent range of evidence about the multitude of health benefits from the urban forest.	

User:	Patrick Mossop
Paragraph 1.3.3. Recommend an addition (in CAPS) to the following sentence: “Access to green and open spaces, including waterways AND TREES, can improve health, but access varies widely across the city.”	

User: CFGN Community Food Growers Network

We support the following changes to GG3 policies:

GG3: To improve Londoners' health and reduce health inequalities, all those involved in planning and development, w hich includes community representation, must:

- **B. promote more active and healthy lifestyles for all Londoners and enable them to make healthy choices. Developing Food Hubs which are centred on local food growing and development of integrated food trading places, provides a range of healthy and local economic and social activities across London**
- **D. assess the potential impacts of development proposals on the health and wellbeing of communities, in order to mitigate any potential negative impacts and help reduce health inequalities, for example through the use of Social and Health Impact Assessments.**
- **E. plan for improved access to green spaces and the provision of new green infrastructure integrated into all new and rehabilitated developments.**
- **G. seek to create a healthy food environment, increasing the availability of healthy food and restricting unhealthy options by working closely with the food sector and communities to allow for more widespread awareness of the importance of creating a more food secure city in terms of quality and quantity.**

These changes also need to be supported by the following changes in the narrative:

- **1.3.1 The health of Londoners is, to a large extent, determined by the environment in which they live. Londoners also shape that environment by how they are able to live. Transport, housing, education, income, working conditions, unemployment, air quality, green space provision and access, climate change and social and community networks can have a greater influence on health than healthcare provision or genetics. Many of these determinants of health can be shaped by an inclusive planning system, and local authorities are accordingly responsible for planning and public health.**

- **1.3.3 The causes of London's health problems are wide-ranging. Many of London's major health problems are related to inactivity. Currently only 34 per cent of Londoners report doing the 20 minutes of active travel each day that can help them to stay healthy, but good planning can help them to build this into their daily routine. Access to green and open spaces, including waterways, can improve health, but access varies widely across the city, so this will need to be regulated and improved by the creation of green opportunities as a part of all housing development and rehabilitation. Excessive housing costs or living in a home that is damp, too hot or too cold can have serious health impacts. A healthy food environment and access to healthy food is vital for good health. Good, inclusive, planning can help address all of these issues. Such planning means councils having to work alongside food sector expertise and communities and work across sectors in a joined up way.**

- **1.3.4 The Healthy Streets Approach outlined in this plan puts improving health and reducing health inequalities at the heart of planning London's public space. It will tackle London's inactivity crisis, improve air quality and reduce the other health impacts of living in a car-dominated city by planning street networks that work well for people on foot and on bikes, and providing public transport networks that are attractive alternatives to car use. It will ensure that green spaces are more widely distributed across London and that their use can be productive, providing Londoners with the opportunity to grow food and be environmental stewards, providing for good mental health activity. It will also ensure that streets become more social spaces for all Londoners.**

- **1.3.6. A healthy food environment is underpinned by a London wide integration of the sub-systems which enable people of all classes, ages, genders and ethnicities to eat a diversity of healthy foods. This includes the knowledge systems which educate everyone on healthy eating practice. Whilst this cannot be centrally controlled for, the Spatial Development Strategy (The London Plan) calls for a good understanding of London's food history and a systemic understanding of how people access food in way that supports their sovereignty, dignity, social cohesion and health. This should strongly inform how policies across the different sectors can support not only every Londoner's health, but also contribute to a thriving London economy and support a decentralised social infrastructure that embraces the other Good Growth policies in each sector. This calls for a greater degree of inter-sectoral working on behalf of the different elements of the plan; housing, transport, heritage and culture, etc as well as by recognising the distinct nature of how each Londoner accesses opportunities for health and ensuring each sector supports this diversity.**

User: Ms Deirdre Woods

I support the following changes to GG3 policies:

GG3: To improve Londoners' health and reduce health inequalities, **all those** involved in planning and development, **which includes community representation, must:**

- B. promote more active and healthy lifestyles for all Londoners and enable them to make healthy choices. **Developing Food Hubs which are centred on local food growing and development of integrated food trading places, provides a range of healthy and local economic and social activities across London**

- D. assess the potential impacts of development proposals on the health and wellbeing of communities, in order to mitigate any potential negative impacts and help reduce health inequalities, for example through the use of **Social and** Health Impact Assessments.

- E. plan for improved access to green spaces and the provision of new green infrastructure **integrated into all new and rehabilitated developments.**

- G. seek to create a healthy food environment, increasing the availability of healthy food and restricting unhealthy options **by working closely with the food sector and communities to allow for more widespread awareness of the importance of creating a more food secure city in terms of quality and quantity.**

User:	Ms Deirdre Woods

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- 1.3.3 The causes of London’s health problems are wide-ranging. Many of London’s major health problems are related to inactivity. Currently only 34 per cent of Londoners report doing the 20 minutes of active travel each day that can help them to stay healthy, but good planning can help them to build this into their daily routine. Access to green and open spaces, including waterways, can improve health, but access varies widely across the city, **so this will need to be regulated and improved by the creation of green opportunities as a part of all housing development and rehabilitation**. Excessive housing costs or living in a home that is damp, too hot or too cold can have serious health impacts. A healthy food environment and access to healthy food is vital for good health. Good, inclusive, planning can help address all of these issues. **Such planning means councils having to work alongside food sector expertise and communities and work across sectors in a joined up way.**

User:	Ms Deirdre Woods

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User:	CFGN Community Food Growers Network

Overall it appears that the role of food growing in terms of the health benefits, wider social and environmental benefits is not fully appreciated or integrated into the draft New London Plan despite the strong evidence on this topic and the Mayor of London’s commitment to a refreshed London Food Board and London Food Strategy.

User: Footwork Architects Limited

Principle 1
Social needs must be identified and addressed as a prerequisite to development

Description:

Whether creating a new neighbourhood, or regenerating an existing one, to transform the built environment alone will not provide for social needs. There must be a thorough understanding of social context and existing problems, then specific steps identified to address them. Until these social factors are tackled, built environment professionals cannot create the physical conditions to help a community thrive. It is essential to avoid repeating the mistakes of the past and to learn from what has worked, through developing and implementing mechanisms for the measurement of success.

Assessment:
Methodology is already in place to assess local social needs:

- *Index for Multiple Deprivation* (the generally accepted measure)
- *Joint Strategic Needs Assessment* and *Joint Health and Wellbeing Strategies* (see Marmot
- Report and the Social Care Act 2012 – aimed at reducing health and social inequalities)
- *Healthwatch* (for local anecdotal data)

Application:

- Each borough to provide a **Social Needs Assessment** within their *Development Plan* and *Local Plan*, referred to within the *Core Strategy* and detailed as a Supplementary Planning Document, which must be kept updated
- This requirement could be inserted at Policy D2 of the Draft New London Plan, by dividing item ‘A’ into two parts. New ‘A’ to be an evaluation of socio-economic and well-being factors, heritage/ character and social infrastructure (currently points 1, 7 and 11); and new ‘B’ an evaluation of the data relating to physical and environmental factors (all the remaining points)

- Local authorities, Clinical Commissioning Groups and other service providers to take steps to address existing social needs, identified in the Social Needs Assessment and against agreed benchmarks, as a pre-requisite for designating *Opportunity Areas*, *Local Areas for Regeneration* and *Strategic Areas of Regeneration*
- *Supplementary Planning Guidance* (SPG) to be prepared (perhaps combined with the SPG on Social Infrastructure currently being reviewed - see below). This must be referenced in all strategic and major development proposals, with the inclusion of a Social Needs Assessment and a strategy for how identified local social needs and well-being are to be taken into account
- *Design Review Panels* to consider strategies to address social needs and well-being as an agreed component of the quality of a design. This must also to form part of the Mayor's planned Guidance on Design Reviews
- *Post-occupancy Surveys* (RIBA Plan of Work Stage 7) to become a contractual obligation for all major housing developments, at 1 year and 5 years after full occupancy. This will be an invaluable reference point for Development Plans and should be obligatory

[Policy GG2: 1.3.1, 1.3.2
Policy GG3: A, D
SD9: 2.10.2, 2.10.1, 2.10.3, 2.10.4; 2.10.5
Policy D2: A
Policy H13: 4.14.1
Policy S2: A: 1; 5.2.7, 5.2.8]

User: Alzheimer's Society

1. Policy **GG3** is right to identify the health inequalities that impact London. This is just as stark in dementia diagnosis which shows a 32% difference between diagnosis rates in the top performing borough and the bottom performing borough[1]. Ensuring a healthy London, which has adequate health and social care infrastructure will be vital to addressing that inequality. Policy **GG3.A** and **GG3.B** broaden out the conversation around health and social care to include preventative measures and ensuring London ‘designs in’ active and healthy lifestyles. Alzheimer’s Society is very supportive of this approach. There is increasing evidence that regular physical exercise can help prevent dementia, along with a healthy diet as highlighted in **GG3.G** and so encouraging healthy lifestyles is very much a part of our prevention agenda.

[1] NHS Dementia Workbook, December 2017. Best performing: Islington – 92.2%. Worst performing: Havering: 60.6%.

User: Hoare Lea LLP`

To achieve the aspiration for a healthy city, through the creation of healthy streets and buildings, a considered and informed design approach would be required.

As stated above (under GG2), specific measures aimed at optimising the health and wellbeing of building users (as promoted by BREEAM and The WELL Building Standard) could be required on development proposals.

This provides a credible and transparent means of driving the need for healthier spaces at both building and community scale.

User:	Hoare Lea LLP`

Appears to look at the impact at development scale and does not consider the wider impact. Difficult to identify how individual buildings would reduce health inequality.
May be difficult in practice although some themes could be enforced/encouraged e.g.:
-Smoke free public realm
-Pedestrianisation of streets/public realm
-Restricted parking

User:	Natural England

Access to greenspace and nature is vital to maintain mental and physical health, and therefore a deficiency in access to either greenspace or nature has the capacity to exacerbate existing health inequalities. We support point E of this policy, which acknowledges the role that greenspace can play in maintaining and improving health by promoting the improvement and provision of new green infrastructure. With increased density, existing and new greenspaces will need to be designed to accommodate greater numbers of people as well as working for biodiversity. Please refer to our comments on Policy D6.

User: CIBSE

We support these general objectives and welcome the recognition of the potential for the built environment to contribute to public health strategies and help address health inequalities.

We welcome the intent to take account of the long-term impact of built environment decisions on communities. We agree that Heath Impact Assessments may be one option which could help better reward and incentivise the decisions which support better outcomes (for example through the use of S106 contributions).

HIAs are however still a relatively new area, with knowledge and supporting evidence still being built upon. We understand that their adoption has so far been limited, and that Local Authorities would greatly benefit from additional resources (e.g. staff, training, guidance) on the application of HIAs. We would be happy to cooperate with the Mayor on this issue.

We would stress that air quality is an essential and inescapable part of achieving the broad objectives of this policy, and would therefore strongly encourage a strengthening of policy SI1, as noted in our comments on that policy.

User:	Sustrans
We strongly support the inclusion of health in the strategic Good Growth policies of the plan. In particular, the approach identified in A, B, C and D and those which embed the Healthy Streets Approach into planning decisions.	

User: Mx Beth Stewart

We support the following changes to GG3 policies:

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User: Hornsey & Wood Green Labour Party

We strongly support all the key points in this section, in particular, using the Healthy Streets Approach to prioritise health in all planning decisions, and the use of Health Impact Assessments to safeguard the health and wellbeing of Londoners in all planning decisions.

We support point F – that all new buildings are well-insulated and ventilated to avoid health problems associated with damp, heat and cold. However these measures could be more explicitly linked to those ensuring the wider reduction of the carbon footprint of all new buildings, and this in turn needs to be presented as inextricably linked to the health and wellbeing of Londoners.

User: Guys' & St Thomas Charity

Policy GG3 Creating a healthy city

We are strongly supportive of any plans to make London one of the healthiest global cities. Unless we address the physical environment in which Londoners live and the impacts of planning policy and practice on health, we are unlikely to make significant impact on addressing health inequalities in London and risk exacerbating existing inequalities.

The spaces in which many Londoners spend their time have more barriers to healthy eating and activity than they do opportunities. This is significant. Our research shows that **childhood obesity** is primarily not a problem of individual knowledge, motivation or self-discipline, but is often ‘a normal response to an abnormal environment’. This is especially true for those living in disadvantaged circumstances – and across the life-course. Research has shown that people from deprived areas are more likely to develop **multiple long-term conditions** earlier than those from wealthier ones. A person’s social context, their education and ability to cope with life events such as social isolation, influences the likelihood and severity of long-term conditions.

Urban areas such as London have both protective and risk factors for health. On the one hand there is proximity to services and social networks. On the other, there is competition for resources and diverse needs. As such, we believe it is important to develop environments that encourage these protective factors – for example, through increasing social connectivity and improving green spaces – while minimising risk factors – such as reducing unhealthy prompts.

User: Mr Gary Hayes

GG3 Creating a healthy city

This policy should specifically refer to health inequalities that relate principally to income levels.1 It is incredibly patronising to suggest that monitoring of the numbers of Londoners engaging in active travel (KP1) is realistic measure of improvements health inequalities.

If the Mayor is serious about creating a healthy city, health inequalities need to be more carefully considered within a range of policies in the London Plan, not just those about encouraging more people to cycle.

Given that poor quality and overcrowded housing is one of the key determinants of poor health (in addition to income inequality) the Mayor should have a policy that actively require boroughs to set targets for achieving better conditions in the private rented sector and on gypsy and travellers' sites and also on addressing overcrowding (which are most prevalent in areas of 'deprivation').

The detrimental impacts of regeneration / gentrification, particularly on older people (either for those displaced but for those remaining) includes loss of strong and supportive neighbours and wider community networks and the stresses (sometimes for years) of potential loss of a home, local shops, services and amenities. It should be noted that connections within physical neighbourhood communities are much more important to lower-income communities than those who are wealthier. The Plan needs to acknowledge this.

User: Mr Timothy Gill

I support this policy. The built form of cities has a major impact on health. A long-term approach is vital. If health-enhancing growth is secured during the development process, this avoids the need to retro-fit measures in years to come. Children in particular benefit from long-term health-oriented growth, as this supports the early adoption of health-enhancing behaviours including playing outdoors and active transport choices.

I support the approach emphasising good food and restricting unhealthy options in GG3, given London’s high levels of childhood overweight and obesity.

User: Sean Creighton

Policy GG3 Creating a healthy city to improve Londoners' health and reduce health inequalities

18. This is a very worthy policy. However, one of the growing problems in London is the stress caused by the effects of past and current growth, the growth in population due to the creation of small housing units in new developments, through conversion of houses, and through multiple occupation in the private rented sector. These cause increasing noise, parking competition, strains of travelling around London, and environmental decline through litter and fly-tipping. Collectively these reduce the quality of life and fuel negativity and helplessness.

19. Large numbers of residents consider they have no control over the change that happens, and that Councils do not listen to them. Croydon Council is driven by the obsession to meet existing housing targets and ensure that Section 106 and CiL are paid by developers. Further growth will add to these problems.

20. There needs to analysis of how the pressures of living in London, aggravated by high levels house prices and rents and low wages, are fuelling the rise in mental health problems.

21. Analysis is also needed to the extent to which the growing mental health problems of school pupils are fuelled by the Government curriculum and testing requirements and by the increasing lack of space many families now live in. e.g. no quiet area for homework.

22. In relation to older people, the increase in loneliness and the costs of living in accommodation larger than they now need, is aggravated by fear of what will happen to them when they can no longer live in their property but cannot find suitable smaller accommodation in the same area.

User:	Andrea Carey Fuller

I Strongly support the approach especially emphasising good food and restricting unhealthy options in GG3 Creating a healthy city G. - seek to create a healthy food environment, increasing the availability of healthy food and restricting unhealthy options.

User: Andrea Carey Fuller

This policy should specifically refer to health inequalities that relate principally to income levels.[1] It is incredibly patronising to suggest that monitoring of the numbers of Londoners engaging in active travel (KP1) is realistic measure of improvements health inequalities.

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The detrimental impacts of regeneration / gentrification, particularly on older people (either for those displaced but for those remaining) includes loss of strong and supportive neighbours and wider community networks and the stresses (sometimes for years) of potential loss of a home, local shops, services and amenities. It should be noted that connections within physical neighbourhood communities are much more important to lower-income communities than those who are wealthier. The Plan needs to acknowledge this.

[1] NB New data out from the Longevity Science Panel finds the gap in life expectancy between the richest and poorest in England has increased from 7.2 years in 2001 to 8.4 years in 2015. **People over 60 in the bottom 20% had death rates around 50% higher than the top 20% in 2001; by 2015, the difference had risen to 80%** (www.bbc.co.uk/news/health-43058394). The report authors 'said income inequality was the biggest factor'. More research today from the Literacy Trust shows huge gaps in life expectancy between districts with the lowest and highest levels of literacy: a boy born in Stockton town centre is expected to die 26 years earlier than one born in north Oxford: https://literacytrust.org.uk/research-services/research-reports/literacy-and-life-expectancy/

This follows on from findings by Public Health England last month that overall life expectancy has stalled since 2010 and has started to fall in certain areas, which is apparently 'unprecedented in peacetime': www.thetimes.co.uk/article/life-expectancy-falls-by-a-year-in-several-regions-of-england-prwcdgzvl. This might be down to austerity, or continued post-industrial deprivation. What the research literature generally finds is that once a certain minimum material threshold is passed it's inequality that effects health rather than material deprivation: the psychological effect of being at the bottom of the pile or having no control over your life.

User: eCountability Ltd

Policy GC3 Creating a Healthy City

We support this policy. We have developed, in partnership with several research organisations, a considerable evidence base that underlies the importance to health of policy GC3 E on improving access to green spaces and the provision of new green infrastructure.

User:	Cross River Partnership
It would be particularly useful to take account here of the role of Business Improvement Districts (BIDs) in the delivery of this Policy in local areas where they are established: working with their host Borough, they can improve the quality of streets in line with this Policy.	

User: Public Health England

Creating a healthy city

? The London Plan is important in ensuring that different elements that make up a healthy place to live are looked at together; and that an integrated approach is taken to the design of high quality places for people to live.

? We support clause D of policy GG3 on Creating a Healthy City which requires the health and wellbeing impacts of development proposals to be assessed and refers to the use of health impact assessments (HIA). However, it is unclear whether the clause applies to all types of development proposals, or just major or strategic applications. At present, there is no supporting text which refers to the use of HIA, nor is there a definition in the glossary. We suggest that clause D is reworded to read “Use Health Impact Assessments to assess the potential impacts of major development proposals on the health and well-being of communities in order to mitigate any potential negative impacts and maximise the potential positive impacts including reducing health inequalities and improving overall health and well-being”.

? Consideration could also be given to whether the promotion of an Integrated Impact Assessment, which would also incorporate a Sustainability Assessment, Strategic
Environmental Assessment and Equalities Impact Assessment, would be beneficial in aligning these processes and limiting workload and duplication. Early undertaking of Impact Assessments should also be encouraged.

User:	YMCA

LONDON YMCAS TO CREATE HUMAN DEVELOPMENT / RE-SKILLING GYMS

YMCA’s story is one of creating the activities to bring well-being to all. With the 21st century delivering unprecedented change (from life-expectancy to economic opportunities) we need to radically rethink how we support human development. YMCA will therefore trial a novel form of gym where membership involves belonging to future societal well-being. In practice this would drastically shape what activities and membership models we offer: from ‘good gym’ type activities to a membership based on courage.

User:	London Borough of Camden

We welcome the Mayor's highlighting of the wider determinants of health that are influenced by spatial planning. This section should explicitly refer to the Mayor's Health Inequalities Strategy and the Mayor's Transport Strategy to point potential developers towards the evidence base underpinning the Plan's approach to health inequalities and active/sustainable travel.

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User: London Borough of Camden

The strategic principles set out in Policy GG3 are welcomed. We support consideration of the wider determinants of health, promoting active lifestyles, healthy streets, assessment of the health and wellbeing impacts of development, and reducing health inequalities.

Camden's recent review of the Local Plan specifically considered how the full range of planning policies could bring about positive benefits for health and wellbeing (a 'health in all policies' approach). It would be beneficial if the supporting text to policy GG3 included a cross reference to policy GG1, in particular recognition of the role that measures to increase social integration and address social isolation can play in improving health and wellbeing.

User: Local London Partnership

Deliverability

This concern touches on the issue of whether the Plan is sound and, in particular, if the Policies are justified and likely to be effective. We are concerned that the Plan may not be capable of meeting the objectives spelt out in the Policies for Good Growth. We are mindful of the statement made by the Deputy Mayor for Planning, Regeneration and Skills at the London Assembly Planning Committee in answer to a question about what he Plan will deliver. *"I think it will if this blueprint is followed, because that is what it is. It is a blueprint for how it can be done, and I come back to my earlier point about the funding. If we cannot either get fiscal devolution or if the Government, alternatively, does not step back into the space of subsidising social infrastructure to levels that it was previously or approaching those levels, if all we are left with is trying to tax developments to deliver all of this, then, no, I do not think we will deliver it. However, as I say, it is a blueprint to show how it can be done and how we think growth can be handled well, including a chapter of what we think needs to be funded to be able to deliver this."* These funding needs are spelt out in Chapter 11. The chapter deals particularly with the increased investment in infrastructure and fundamental changes to the housing market needed to achieve the step change in housing delivery envisaged in the Plan. The significant need to invest in enabling infrastructure, water, energy, waste, digital connectivity and social infrastructure is also referenced. The public sector funding gap is particularly emphasised (para 11.1.8). Funding the infrastructure to support growth is a necessary prerequisite to achieve Good Growth in the Local London area.

Our concern is that these investments are dependent on public policy decisions by Government which are outside and independent of the Plan making process but are stated to be key to the delivery the London Plan policies. This makes the whole Plan uncertain. In Local London there is particular concern that the investment in public transport infrastructure required to enable Good Growth will not be forthcoming, or at least not at the same pace as housing provision, leading to adverse impacts on the Plan's Policies for Good Growth. A lack of new public transport provision will lead to greater use of motor vehicles for trips and increased road congestion, particularly in outer London, with adverse impacts people's ability to move around the City (Policy GG1/A), on health through increased pollution (Policy GG3/A) and on transport provision (Policy GG5/G) and Policy T3

User:	Local London Partnership

In order that boroughs can meet need for an appropriate mix of housing units set out in H12 A1 there must be the option for boroughs to be able to prescribe a dwelling size mix for market and intermediate homes and therefore Policy H12 C should be deleted. To leave this Policy in the Plan will mean that boroughs will have to achieve an appropriate dwelling mix through Policies only affecting a proportion of the housing supply. The outcome is likely to be an under-provision of large family units with the adverse impacts on Policy GG 3A outlined above.

User: Socialist Health Association London

GG3

To improve Londoners' health and reduce health inequalities, those involved in planning and development must:

1. ensure that the wider determinants of health are addressed in an integrated and co-ordinated way, taking a systematic approach to improving the mental and physical health of all Londoners and reducing health inequalities.
2. promote more active and healthy lifestyles for all Londoners and enable them to make healthy choices.
3. use the Healthy Streets Approach to prioritise health in all planning decisions.
4. assess the potential impacts of development proposals on the health and wellbeing of communities, in order to mitigate any potential negative impacts and help reduce health inequalities, for example through the use of Health Impact Assessments.
5. plan for improved access to green spaces and the provision of new green infrastructure.
6. ensure that new buildings are well-insulated and sufficiently ventilated to avoid the health problems associated with damp, heat and cold.
7. seek to create a healthy food environment, increasing the availability of healthy food and restricting unhealthy options.

Creating a Healthy City

A.

We very much approve of the expansion the 'determinants of health' categories and recognition that this can – and should - be shaped into and then by the planning system.

Transport, housing, education, income, working conditions, unemployment, air quality, green space, climate change and social and community networks can have a greater influence on health than healthcare provision or genetics.

We approve of the recognition of the urgent need to reverse rising inequality

We urge all local authorities in London to pay attention to their responsibility for HEALTHY planning

We regret the way in which public health has been forced by central govt into a non ring-fenced function rather than a real service which can fully protect and promote public health.

However, if we seek to be positive influencers upon the place in which we live and work, in order to do so, we need to take a stronger approach than that currently proposed in the London Plan.

>> Mechanisms for promoting healthy lifestyles

Questions : What form will these take? Who will deliver them?

Comment : the health KPI is very weak and vague

- **we explore this later in the document**

B.

This is the reality of the public health challenge :

We note that in June 2015, the Treasury announced a reduction in the public health grant to local authorities by £200 million, this is to be followed by further government cuts in public health funding of at least £600 million by 2020/21.

Kings Fund January 2018

We acknowledge that local authorities are facing significant austerity and being forced to make difficult choices with cuts in services across the board.

The reduction in Public Health budgets has to led to cuts to children's 0-19 community health services budgets, specifically Health Visiting and School Nursing services which are commissioned by local authorities. Providers (largely NHS in London) therefore have been urged to 'Transform' services to fit reduced budgets.

So-called ‘Transformations’ have led to care being provided by fewer qualified health visitors, and a greater proportion of less qualified and professionally unaccountable staff.

We consider this a risk to the health, growth and wellbeing of children under 5 especially missed opportunities to detect post-natal depression and parenting problems and to provide education about healthy eating. Low Vitamin D intake, immunisation and stimulation of appropriate development may contribute to poor outcomes for London’s most vulnerable children.

A vital element of a healthy city is ensuring that everyone, particularly the most vulnerable, have easy access to GPs and other primary healthcare facilities. People with young children, elderly and disabled people especially need access to GPs and other routine primary healthcare that is nearby and does not involve lengthy and inconvenient journeys. However the Government's plans for healthcare involve a massive reduction in local NHS sites (in order to reduce NHS spending by £26bn p.a. by 2021 compared with 2015 levels). This reduction of local sites will mean great hardship for the most vulnerable and huge inconvenience for most people. Long journeys to GPs and clinics will mean that many of the most vulnerable people will simply 'do without' the healthcare they need.

Government justifies the policy by pointing to the need to create larger hubs with specialist facilities. Of course specialist facilities are needed - but not at the expense of convenient local care. Ease of access to health is as important a criterion of good healthcare as clinical excellence.

The London Plan must tackle this by ensuring that ease of access to GPs and primary care - as well as to hospitals and A&E, including length and complexity of journey, must be given a high priority in any planning consultation and local decisions.

How to involve local communities.

Will there be funded posts or will this be left to communities to build or add to existing voluntary structures? Is there a capacity issue to deliver this effectively ?

We have models where this has already been effective such as the integrated multi-purpose health centre in Somers Town which has been developed with community input – yet at the same time this community is at risk of increased ill health due to the HS2 works impacting air quality and noise pollution and general community upheaval.

BAME Population

Some of the areas of London with highest levels of inequalities happen to also have most of our black and minority ethnic communities. These most diverse areas of our city have some of our most challenging health needs which can be addressed with more outreach and education with preventative public health programmes.

Levels of tuberculosis, heart related problems and diabetes are higher in BME communities and conditions such as sickle cell anaemia occur exclusively.

C

Healthy Streets

>> We note that other respondents have cited the lack of neighbourhood ethos or planning as being problematic for future healthy lifestyles.

>> Good health at centre of planning is an excellent intent. This needs to be done with best practice advice from organisations such as the Town and Country Planning Assoc.

>> How to include local residents and other stakeholders most effectively?

>> How will this be managed?

Working with local communities must not be tokenistic but taken back to the original ethos of consultation and regeneration.

Data from After Grenfell : We refer to this because Kensington and Chelsea is the focal point of inequality in the Capital :

Average child poverty in London is 28%, but in K&C it is 27%. This is made

up from a level of just 2.8% in Queen’s Gate, and an appalling 58% in Henry

Dickens Court, Norland ward. This is worse than Glasgow’s Gorbals, at 49 %.

The Child Poverty Action Group states that there are over 4,500 children living in poverty in the borough costing the economy £49m a year; that's £10,000 per child per year. In Kensington two-thirds of children living in poverty come from working families, with half of them earning less than £7.50 per hour. Incidence of diabetes, chronic heart and pulmonary disease and even TB has risen exponentially in the past six K&C is blessed with parks and green space, tennis courts and other sporting facilities. However over the years many of these publicly owned assets have been privatised. Funding for primary school sports activities has been decimated, and free swimming for children and over 60s ceased in 2010.

Physical activity for school aged children is unaffordable to many and is dropping, while obesity in Year 6 children has more than doubled, from 8.6% in 2010 to 20% in 2016

Income inequality is extreme. The median income in K&C is £140,000, the highest in the country, though this is still not enough to buy a home at the average cost of £1.5m.

The Index of Multiple Deprivation shows the score for Queen's Gate is 8.4, and it is the 'least deprived ward in England'. Swinbrook Estate off Portobello Road however has an IMD

of 53, and is in the 4% worst deprived wards in England

Two thirds of the adult population in K&C are in employment, and a third of them work over 49hrs per week. Nearly 5,000 are seeking work.

In Pelham Crescent, South Kensington only 1.4% are unemployed, but if you cross the road to Samuel Lewis Buildings, this rises to 13%.

Shockingly, since 2010 in Kensington and Chelsea -

There has been a 6 year drop in life expectancy in Golborne ward since 2010.

Child obesity linked to poverty in Yr 6 pupils has doubled in seven years

Hip fractures in over 65's have doubled since 2010

Under 75's cancer mortality has increased by one third

These extracts from **After Grenfell (Nov 2017, Emma Dent Coad MP)**
file:///C:/Users/Jos%20Bell/Downloads/After%20Grenfell%20(2).pdf show us the stark reality of inequality in London – but how far will what is planned in the new London Plan really make a difference? The only way to achieve this is with

1. proper use of current resources
2. additional resources in line with population trends
3. a reversal of funding models which reward longevity instead of supporting areas with avoidable early mortality

Malnutrition

Malnutrition is an increasing problem – it can take several forms, from the severely underweight to obese. Incidents of rickets and hypo-calceamic shock have been reported in children for the first time in decades. Older people living in poverty are at great risk of being severely underweight and it is a major factor in hospital admissions in this age group.

Food banks are now a common feature of almost every neighbourhood. These are indicators of a failing health strategy at central government, but local government can intervene.

There are two key areas of concern which we would like to highlight in this comment.

The first is the failure to address the public health emergency of child obesity in the context of the Mayor's responsibility for a strategic approach to reducing inequalities in health. The second is the absence of attention to supporting structures and practices that extensive work on takeaways by Public Health England has shown would engage with barriers to healthy eating in low-income areas.

Access to Takeaways

Healthier food should be made affordable for low income children and young people to tackle inequalities in obesity. This is a demanding challenge in light of the market failure which has been found in studies of takeaways serving such populations. The major thrust of recent policy advice on fast food outlets is for local authorities to use current or enhanced planning powers to control the spread of takeaways near schools, to encourage or require healthier options, and to make information about healthfulness clearer. It is an urgent matter for the London Plan to promote a healthier food environment. Policy E9 is devoted to Retail, markets and hot food takeaways. We comment on the London Plans's (LP) policy proposals on takeaways as it is the only health issue for which a topic paper is supplied. Its insufficiency exemplifies policy weaknesses in public health in the LP.

We are told that the "Mayor's Food Strategy prioritises the need to help all Londoners be healthier and for the food system to have less of a negative environmental impact" (8.8.4 p319). Policy E9 (pp257-8) is based on evidence in the Health Topic Paper devoted to Hot Food Takeaways. Under the heading

Impact on mental and physical health and well-being:

C. New A5 hot food takeaways will not be permitted within a 400 metre walking distance of existing or proposed primary or secondary school. In addition, local authorities will be able to limit the concentration of takeaways where "sufficiently justified".

D. Where permission is given, the operator is required "to achieve accreditation, and operate in compliance with the Healthier Catering Commitments standard".

These proposals do not address key public health issues. The Mayor's statutory responsibility to address inequalities in health and the 2010 Equalities Act should inform all policy proposals in the LP. These requirements should shape, as well, the monitoring function ie in selection of KPIs and measurement. There is no direct reference to these requirements in respect of the proposals on Takeaways. The London Health Inequalities Strategy, still in draft form, does not have an implementation framework and is not grounded in an upstream social determinants of health approach. This accountability deficit should be remedied.

Overweight and obesity amongst children is a major public health threat.

Those most at risk of developing obesity-related health problems disproportionately experience poverty. Their economic and social position shapes their food behaviour. “People from certain ethnic groups, such as south Asians, are more likely to be overweight and obese, and have a higher susceptibility to particular diseases linked to excess weight, such as type 2 diabetes “(Health Matters PHE).

The policy proposed in the London Plan would be met if every new takeaway meeting the distance criterion were a Planet Organic or a Leons as these outlets, which tend to provide healthier options do not provide inexpensive menus and do not set up outlets in low income catchments.

Research led by Susan Bagwell of London Metropolitan University with the Chartered Institute of Environmental Health, funded by the ESRC, looked at healthy catering schemes across the UK to identify how to make such schemes support access to healthier food by people on low incomes (Encouraging Healthier Takeaways in Low-income Communities: https://responsibilitydeal.dh.gov.uk/wp-content/uploads/2015/.../Takeaways_toolkit.p...)

The research focussed on small independent providers in deprived neighbourhoods, as previous work had shown that these outlets were likely to be run by and to employ people who were themselves on the economic fringe. The research investigated barriers to offering healthier AFFORDABLE food and showed steps local authorities could take to make Healthy Catering Schemes actually work. Surprisingly, it showed that supply chains for independent takeaways were highly concentrated.

Only 3 suppliers dominated provision across the whole of London. Such concentration opens opportunities for local authorities to help independent takeaways by using their public procurement powers to accomplish several aims . Firstly by negotiating directly with these providers they can achieve economies of scale potentially reducing the cost to the takeaways and secondly they can exercise leverage to negotiate lower prices for healthier ingredients for fast food businesses across their catchment area. This research highlighted the importance of support and cooperation from agencies involved in environmental health, community nutrition and trading standards. Unfortunately, these sections of the local authority public health workforce are being cut across London.

Bagwell’s research showed that some proprietors of fast food outlets have been able to take steps to offer healthier menus to customers and explored the factors which enabled them to do so as well as the barriers they faced.

Public policy must take into account the fact that food provision in the UK is marked by concentration of suppliers and segmented markets. Public policy should engage with the fact that the takeaway landscape is highly fluid and is changing rapidly. Some outlets can accommodate changes required by those customers who can afford to buy healthier takeaways. This is difficult to achieve for businesses with a low-income client base. Here the higher costs for healthier ingredients make independent outlets serving low income customers financially precarious. They can only improve what is on offer if their efforts in doing so are at least cost-neutral.

There is scope for improvement in takeaways. Since the publication of the Foresight Report 2007, local authorities have led the way in establishing collaborative working across agencies which engage with the health impact of takeaways. They have developed procedures and processes for using the planning system to limit the expansion of unhealthy takeaways and have been widely commended for doing so. They carried this development work when child obesity was given prominence in the national government agenda. The London Plan proposes to build on local authority developments, but it does not address barriers identified by Susan Bagwell's recent research for Public Health England. It doesn't make use of the wide ranging examples of good practise regarding public procurement and/or supply chains which she identifies:

Brighton and Hove council has set up a Good Food Procurement Group "for all major public sector food purchasers..to collectively promote the procurement of sustainable and healthy food" with minimum standards set for public sector purchase. In Warrington local authority staff work with local manufacturers on reformulation and front-of-pack labelling. In London, The Healthier Catering Commitment (HCC) network is working with one of the three major suppliers identified in Bagwell's earlier research, JJ Food Supplies. This supplier highlights healthier products, prices healthier options at the same or similar or price as less healthy options, and is piloting a 10% discount to network members on such options. (https://www.gov.uk/.../Encouraging_healthier_out_of_home_food_provision_toolkit... www.gov.uk/phe)

Identification of obesogenic environments shaping unhealthy food consumption, and evidence regarding the popularity of fast food outlets serving energy dense food to young people require the attention of policy makers. Non-communicable diseases such as diabetes are increasing alarmingly in local, national and global populations, threatening to make health care systems unsustainable. The evidence from the Global Burden of Disease Study takes diet as a crucial risk factor for diabetes and urges us to take preventive action. The NHS Chief Executive notes that "..Bad diet has overtaken smoking as the principal health risk in this country. About 40% of the disease burden the NHS faces comes from potentially preventable conditions. And diet has edged ahead of smoking." He argues that we should go "upstream...[with].. ….ambitious targets for added sugar and to hold the food industry to account, with regulatory action if it doesn't happen by a certain date."

https://www.theguardian.com/society/2016/jan/18/simon-stevens-trying-save-nhs-from-mother-of-messes.

The London Health Commission's recent work on health in London provides evidence regarding approaches that are being taken around the world to address health and health care problems. The Commission, set up by the London Mayor, refers to child obesity in London as a "health emergency".

International comparison of overweight and obesity in cities shows London performing worst for children, and third worst for adults (Lord Darzi 2014 Better Health for London The London Health Commission Report https://www.healthy london.org).

There are many examples of good practice already in these cities which should be incorporated into London's planning. Importantly, in accord with the Commission's proposals, there is a need to depart from simplistic oppositions between individual choice and government control and to avoid having single solutions to a complicated problem such as limiting the spread of takeaways to address obesity.

New York continues to have very high rates of child obesity but has taken steps credited with halting its increase. New York acted on a ten year public health strategy, established nutritional standards for food procurement by public agencies, and provided free school meals. Following consideration of a wide range of nutrition strategies in cities, the London Commission concluded that for London "A combined "Carrot & stick" approach is most effective: tax unhealthy food; provide access to affordable healthy food"(LHC 2014: 29). The London Plan has included the London Health Commission's proposal to exclude permission for new fast food outlets within 400 metres of schools. But it does not come up with a strategy comprising the wide suite of interventions being developed elsewhere.

Thus Public Health policy in general and takeaways policy in the London Plan should:

1. Be informed and monitored by reference to impact on health equity especially in respect of children.

2. Be embedded in a strategic approach to building a healthier food environment incorporating best practise from cities across the UK and internationally

Community Health

Far from community health having additional resourcing to cover the gap resulting from cuts and overloading to the acute sector, there is increasing concern about the oversight in current community provision for the frail, sick and for those with disabilities.

DWP rulings and the Bedroom Tax and cuts to social care have hit many very hard.

For those with disabilities entering the system through the A&E route there are added challenges and huge pressures on the service, which are resulting in individuals being returned to day unit/ care at home when they are not equipped to deal with it.

here is a significant lack of strategic thinking about this cohort.

Overall there is a a severe lack of backup services which places even more pressure on A&E and creates potentially more complex health situations.etc etc

One recently discharged patient told us

‘I’ll never forget the old lady collected by Brighton Ambulance services at 7am to attend a day unit appointment at 3pm, nor the two mothers on sick leave from companies like McD having daily 30 mins/ 1 hour IVs that took all day because of the pressure caused by the ‘Winter crisis’.One fretting every min over collecting her kids from childcare cost her £60; the other who could drive and was being crippled by daily car parking fees. ‘

The care at home/ in day units are supposed to save the NHS money but this seems to unfairly redistribute costs onto patients and particularly onto patients who might have long term and chronic illnesses, and those in low income groups, like the young mothers this patient encountered.

We all know from the winter headlines that there is no planning for capacity and this has a knock on for families as well as the individual patient.

Transport is a health issue too - the cuts to our transport infrastructure by government eg. Eltham to Victoria via Kings College Hospital make it difficult to get to essential out-patient appointments, particularly in terms of basic access for those with mobility challenges when patient transport services are overstretched.

The Mayor of London should again push for more of the transport infrastructure to come under the TFL umbrella.

Public Health and Migrant Charging for NHS Services

Although there is a trend in recent years for notifications of Tuberculosis to be gradually declining, health, professionals are concerned that where the fields of both TB and HIV are concerned that the true incidence of these diseases is masked by the fear among non UK nationals that by requesting hospital or primary care - they may be charged large amounts of money for healthcare - their details and immigration status will be shared with the Home Office

The public health implications of this are serious

The same fears are expressed by pregnant women who are non UK nationals.

Healthcare professionals state that such women are often vulnerable and risk health problems to themselves and their developing babies by not coming forward for antenatal care or even worse, missing timely obstetric intervention during childbirth

These are fears which no Londoners should face

As Mayor of a multicultural and international city we ask that City Hall lobby against these government measures which disproportionately affect the population of London.

Wound Care and Management

Our elderly population can become prone to skin integrity issues. Poor wound care management can lead to other complications and confine once actively elderly to home. - sometimes permanently, as these skin issues become infected ulcers etc. NB Plymouth Wound Care

There needs to be a proposal to increase specialist on the job nurse training, continued professional development for said nurses and greater emphasis on continuity of care and focus on not maintaining the status quo but healing wounds before complexity sets in. The expertise exists it just needs to be brought into NHS.

Skin integrity is often over looked or seen in isolation, in fact as a complex organ it can undermine a person’s whole health and well being. – this also has a causative/preventative link with diet and lifestyle.

Preventing and Addressing FGM

We support the detail in this GLA report but urge for more rapid preventative action –

'Of the 12 local authorities with the highest volumes of FGM, the majority were in London: Brent, Southwark, Enfield, Ealing, Lambeth, Camden and Greenwich were among the 12 local authorities nationally with the highest incidence of newly recorded cases between April 2015 and March 2016; and Brent, Harrow, Ealing, Southwark, Enfield, Lambeth, Camden and Hillingdon were among the 12 local authorities nationally with the highest incidences of total attendances during the same period.

The most recent published data on FGM confirms the overall picture.

It shows that between October and December 2016, almost one out of every two newly recorded women and girls were from London (620 out of 1,268 or 49 per cent). Similarly, 49 per cent of the 2,332 attendances reported at NHS trusts and GP practices where FGM was identified or a procedure for FGM was undertaken were from London.

These figures demonstrate the need for a focused effort to tackle FGM in London, including peer to peer education and more effective prosecutions.

https://www.london.gov.uk/sites/default/files/london_assembly_report_-_tackling_fgm_in_london.pdf

Safe Housing

This is clearly a public health issue of the most pressing kind.

Safe housing - see Emma Dent Coad report : After Grenfell

After Grenfell Housing and inequality in Kensington and Chelsea: "The most unequal borough in Britain"
file:///C:/Users/Jos%20Bell/Downloads/After%20Grenfell%20(2).pdf

We also know that there are many similar homes across London. City Hall must continue to put pressure on the government along with the Parliamentary Labour Party to address all the issues which continue to emerge from the Grenfell disaster.

Grenfell residents who are still in hotel rooms rather than a decent home say they feel abandoned by the government.

City Hall should also increase support for campaigns for safety of white goods and recall of faulty models as led by Andy Slaughter MP following the Shepherd’s Bush and Grenfell fires.

User: Socialist Health Association London

GG5

To conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, those involved in planning and development must:

1. promote the strength and potential of the wider city region.
2. seek to ensure that London's economy diversifies and that the benefits of economic success are shared more equitably across London.
3. plan for sufficient employment and industrial space in the right locations to support economic development and regeneration.
4. ensure that sufficient high-quality and affordable housing, as well as physical and social infrastructure is provided to support London's growth.
5. ensure that London continues to provide leadership in innovation, research, policy and ideas, supporting its role as an international incubator and centre for learning.
6. promote and support London's rich heritage and cultural assets, and its role as a 24-hour city.
7. maximise London's existing and future public transport, walking and cycling network, as well as its network of town centres, to support agglomeration and economic activity.

THE CONTRIBUTION OF THE HEALTH ECONOMY MATTERS TOO –

A healthier population is a more productive population/community/city/economy

We note that the Mayor does not have a Healthy London Deputy

All measures possible should be undertaken / facilitated / encouraged to support a healthy London health economy which includes housing support for health workers, challenging the government on its dismantling of the NHS and supporting measures to overturn that as follows :

- ensure that City Hall does not undertake measures which undermine the preservation of sufficient health services in the capital
- Just as Boris Johnson was vocal in his support for dismantling Lewisham Hospital – until the campaign persuaded him otherwise, there is far more potential for the current Mayor to speak out for the securing of London's health infrastructure

- support for the social care sector, highlighting innovative means adopted by some local authorities eg. Hammersmith & Fulham and pressing for an integrated system which lifts social care out of the funding doldrums and puts it on a par with a re-nationalised NHS.

The Key Performance Indicator (KPI) relating to health in the London Plan is highly insufficient for proving the case for either supporting a healthier population or measuring outcomes from measures planned/taken.

User: Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living

GG3 (17) - Creating a Healthy City

We support the provision of age appropriate housing for older people to ensure that the environment they live in supports their stage of life by increasing social interaction and by providing housing that is fit for purpose. However, there does not seem to have been any consideration of whether the other policies of the plan (especially DLP policies H5 and H6) undermine the achievement of the objectives here, and therefore whether the plan as a whole makes sense.

We support this policy.

User:	Age UK London - a charity working with older Londoners

POLICY GG3 CREATING A HEALTHY CITY

Add criterion
SEEK DEVELOPMENT PROPOSALS THAT PROMOTE MAXIMUM SOCIAL COHESION AND THE MINIMISATION OF SOCIAL ISOLATION. THIS INCLUDES ADDRESSING INTERGENERATIONAL INEQUALITIES BY INSPIRATIONAL DESIGN AND VIBRANT PLACE MAKING.

Also: To add a further criterion here, or elsewhere if more appropriate, to sign London up to the global register of Age Friendly Cities.

User:	Age UK London - a charity working with older Londoners

15. GG4 (see evidence for GG1) LINK TO POLICY CHANGE Include conversions in addition to new build otherwise the Mayor's New Plan can be thwarted. Furthermore, by re-iterating the need for age-friendly and disability-friendly construction, a clear, consistent instruction is provided to and reinforces the message for, developers. Good design is seen to be a crucial element, see GG4C, of the Plan and the need to provide for an ageing population has been established, see GG1 nos 1-6 above and GG1F LP.

16. GG4 Adding Criterion F strengthens the New London Plan, helps to ensure that new developments are 'Fit for purpose 'and contributes to social cohesion.

User:	Regeneration X

Policy GG3 Creating a Healthy City
F – : There are potential problems with over-heating with new buildings – a vital issue to consider and address.

User:	David Callow
Paragraph 1.3.3. Recommend an addition (in CAPS) to the following sentence: “Access to green and open spaces, including waterways AND TREES, can improve health, but access varies widely across the city.”	

User:	Elisabeth Rolls

- Paragraph 1.3.3. Recommend an addition (in CAPS) to the following sentence: “Access to green and open spaces, including waterways AND TREES, can improve health, but access varies widely across the city.”

User:	Adrian Malcolm Darley
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User:	Agnes Byrne
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User:	Alan Jacobs
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User:	Alan James North

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Paragraph 1.3.3. Recommend an addition (in CAPS) to the following sentence: “Access to green and open spaces, including waterways AND TREES, can improve health, but access varies widely across the city.”

User: Mr Daniel Willis

b) Health and social infrastructure

We welcome the Mayor's recognition of the importance of health and social infrastructure throughout the proposed Plan and support the aims set out in "Policy GG3: Creating a healthy city". The preamble of Policy GG3 alludes to a more holistic understanding of the socioeconomic determinants of health inequalities in the modern city and Community Links wholeheartedly endorses this approach. In our Strategic Plan for 2018-20, we outline the concept of "Ready for Everything Communities" in which residents are able to support each other to overcome problems, prevent them from occurring again and help each other to thrive and achieve their goals. In the coming years, we aim to build these healthier, happier communities by providing new solutions to the public service landscape focusing on Employability, Health, Housing and Open-Door Advice Services. We look forward to sharing the findings of our work and engaging further with the Mayor and GLA on this in the future.

That being said, we believe that it is vital that the new Plan places greater emphasis on the importance of community centres and preventative services in the ecology of social infrastructure. As the Plan highlights, health inequalities are indicative of deeper social and economic inequalities. We use our community hubs in Canning Town, Stratford and Silvertown to deliver crucial services which all contribute to positive physical and mental health outcomes for our local community. The Early Action approach we deploy aims to intervene in issues before they come crises and is increasingly being deployed by institutions, including the London Metropolitan Police, to tackle public health issues (such as knife crime). Community Links has also achieved excellent results in our breast and bowel cancer detection programmes which now operate in 17 London boroughs.

With this in mind, it is clear that community centres such as ours play a vital role in delivering a healthy city. Health professionals are recognising these centres as vital to social prescribing and so the protection and expansion of these centres should be given strong consideration in future planning decisions. Community Links therefore endorses the proposal by Just Space for health and well-being indicators to be incorporated into decision-making around regeneration schemes and for further analysis of the impact of housing displacement on health to be conducted by the GLA in collaboration with the voluntary sector. Furthermore, we call on the Mayor to amend Policy GG3 to recognise: that spatialised economic inequalities play an active role in determining health inequalities; that advice services and community centres form part of the ecology of a healthy city; and that an Early Action approach can help to deliver a healthier, happier London.

User: Matthew Robinson

I support the following changes to GG3 policies:

GG3: To improve Londoners' health and reduce health inequalities, **all those** involved in planning and development, **which includes community representation**, must:

- B. promote more active and healthy lifestyles for all Londoners and enable them to make healthy choices. **Developing Food Hubs which are centred on local food growing and development of integrated food trading places, provides a range of healthy and local economic and social activities across London**
- D. assess the potential impacts of development proposals on the health and wellbeing of communities, in order to mitigate any potential negative impacts and help reduce health inequalities, for example through the use of **Social and** Health Impact Assessments.
- E. plan for improved access to green spaces and the provision of new green infrastructure **integrated into all new and rehabilitated developments.**
- G. seek to create a healthy food environment, increasing the availability of healthy food and restricting unhealthy options **by working closely with the food sector and communities to allow for more widespread awareness of the importance of creating a more food secure city in terms of quality and quantity.**

User: Matthew Robinson

These changes also need to be supported by the following changes in the narrative:

- 1.3.1 The health of Londoners is, to a large extent, determined by the environment in which they live. **Londoners also shape that environment by how they are able to live.** Transport, housing, education, income, working conditions, unemployment, air quality, green space provision and access, climate change and social and community networks can have a greater influence on health than healthcare provision or genetics. Many of these determinants of health can be shaped by an inclusive planning system, and local authorities are accordingly responsible for planning and public health.
- 1.3.3 The causes of London's health problems are wide-ranging. Many of London's major health problems are related to inactivity. Currently only 34 per cent of Londoners report doing the 20 minutes of active travel each day that can help them to stay healthy, but good planning can help them to build this into their daily routine. Access to green and open spaces, including waterways, can improve health, but access varies widely across the city, **so this will need to be regulated and improved by the creation of green opportunities as a part of all housing development and rehabilitation.** Excessive housing costs or living in a home that is damp, too hot or too cold can have serious health impacts. A healthy food environment and access to healthy food is vital for good health. Good, inclusive, planning can help address all of these issues. **Such planning means councils having to work alongside food sector expertise and communities and work across sectors in a joined up way.**
- 1.3.4 The Healthy Streets Approach outlined in this plan puts improving health and reducing health inequalities at the heart of planning London's public space. It will tackle London's inactivity crisis, improve air quality and reduce the other health impacts of living in a cardominated city by planning street networks that work well for people on foot and on bikes, and providing public transport networks that are attractive alternatives to car use. **It will ensure that green spaces are more widely distributed across London and that their use can be productive, providing Londoners with the opportunity to grow food and be environmental stewards, providing for good mental health activity.** It will also ensure that streets become more social spaces f**or all Londoners.**

- **1.3.6. A healthy food environment is underpinned by a London wide integration of the sub-systems which enable people of all classes, ages, genders and ethnicities to eat a diversity of healthy foods. This includes the knowledge systems which educate everyone on healthy eating practice. Whilst this cannot be centrally controlled for, the Spatial Development Strategy (The London Plan) calls for a good understanding of London's food history and a systemic understanding of how people access food in way that supports their sovereignty, dignity, social cohesion and health. This should strongly inform how policies across the different sectors can support not only every Londoner's health, but also contribute to a thriving London economy and support a decentralised social infrastructure that embraces the other Good Growth policies in each sector. This calls for a greater degree of inter-sectoral working on behalf of the different elements of the plan; housing, transport, heritage and culture, etc as well as by recognising the distinct nature of how each Londoner accesses opportunities for health and ensuring each sector supports this diversity.**

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User:	Fenella Barton
Recommend an addition (in CAPS) to the following sentence: “Access to green and open spaces, including waterways AND TREES, can improve health, but access varies widely across the city.”	

User:	Joan Anne Hepworth
In paragraph 1.3.3 "and trees" should be added after the word waterways.	

User:	Tatjana Zacharova

Paragraph 1.3.3 Access to green and open spaces, including waterways AND TREES, can improve health, but access varies widely across the city. Talking not just about physical health, mental health requires green spaces more than anything; And people living in London do deserve that. The more, the better life will be.

User: Association of Directors of Public Health

ADPH London strongly agrees with Policy GG3 - Creating a healthy city – it plays to a public health aim to embed health in all (local government) policies.

We are pleased that the policy references the wider determinants of health, but want to ensure that best practice and learning is shared in, and across the 32 London Boroughs to encourage the best outcomes for residents.

We ask that the headline statement on this policy be amended as follows: **To improve Londoners' health and reduce health inequalities, those involved in planning and development should identify and review best practice, and must: ….**

ADPH London wishes to include a statement, aligned to the London Councils London Plan interim response, encouraging boroughs to have 20mph speed limits around schools.

We ask that action GG3 C be amended to: **Use the Healthy Streets Approach to prioritise health in all planning decisions, including the promotion of active travel and physical activity; and the encouragement of a 20 mph speed limit in close proximity to educational settings such as children's centres and schools.**

We note that this amendment might also be added to SB 3.

We welcome the reference to Health Impact Assessments in GG3 D, but also think this requirement could be further strengthened and reinforced by embracing it within a broader 'Integrated impact assessment' process that will ensure consideration of the wider determinants of health. An Integrated Impact Assessment includes: a Sustainability Assessment and Strategic Environmental Assessment; an Equalities Impact Assessment; and a Health Impact Assessment (HIA). The Health Impact Assessment is the only non-statutory assessment of the 3, and by including it in a broader process it is more likely that outputs will be actioned. There is also scope to include key elements of a HIA in a Sustainability Assessment and Strategic Environmental Assessment.

We recommend the action is amended to: **Assess the potential impacts of development proposals on the health and wellbeing of communities, in order to mitigate any potential negative impacts and help reduce health inequalities, for example through the use of an Integrated Impact Assessment process. Consideration should also be given to reducing workload and duplication by incorporating key aspects of a HIA into a Sustainability Assessment and Strategic Environmental Assessment.**

We also recommend that narrative be added to GG3 C with reference to impact assessments being timely - HIAs carried out just before the submission of the planning application have very limited practical applications, and run the risk of simply being a 'tick box exercise': **Impact assessments must be undertaken at a very early stage of the master planning, so that any potential issues identified can be addressed.**

User:	William Lucy
Paragraph 1.3.3 **Recommend** an addition (in red) to the following sentence: “Access to green and open spaces, including waterways and trees, can improve health, but access varies widely across the city.”	

User:	Notting Hill East Neighbourhood Forum

1. Make sure that the ideal of making streets planned for people to move around more safely is linked to turning many streets into attractive community PLACES where both adults and children will want to spend more time. We would also add under 1.3.4 make the streets (and the city as a whole for that matter) more beautiful. 1.4.9 We would like to see 'improving the visual quality of the city' enshrined in the plan also.

User: Mr Daniel Willis

Health and social infrastructure

We welcome the Mayor's recognition of the importance of health and social infrastructure throughout the proposed Plan and support the aims set out in "Policy GG3: Creating a healthy city". The preamble of Policy GG3 alludes to a more holistic understanding of the socioeconomic determinants of health inequalities in the modern city and Community Links wholeheartedly endorses this approach. In our Strategic Plan for 2018-20, we outline the concept of "Ready for Everything Communities" in which residents are able to support each other to overcome problems, prevent them from occurring again and help each other to thrive and achieve their goals. In the coming years, we aim to build these healthier, happier communities by providing new solutions to the public service landscape focusing on Employability, Health, Housing and Open-Door Advice Services. We look forward to sharing the findings of our work and engaging further with the Mayor and GLA on this in the future.

That being said, we believe that it is vital that the new Plan places greater emphasis on the importance of community centres and preventative services in the ecology of social infrastructure. As the Plan highlights, health inequalities are indicative of deeper social and economic inequalities. We use our community hubs in Canning Town, Stratford and Silvertown to deliver crucial services which all contribute to positive physical and mental health outcomes for our local community. The Early Action approach we deploy aims to intervene in issues before they come crises and is increasingly being deployed by institutions, including the London Metropolitan Police, to tackle public health issues (such as knife crime). Community Links has also achieved excellent results in our breast and bowel cancer detection programmes which now operate in 17 London boroughs.

With this in mind, it is clear that community centres such as ours play a vital role in delivering a healthy city. Health professionals are recognising these centres as vital to social prescribing and so the protection and expansion of these centres should be given strong consideration in future planning decisions. Community Links therefore endorses the proposal by Just Space for health and well-being indicators to be incorporated into decision-making around regeneration schemes and for further analysis of the impact of housing displacement on health to be conducted by the GLA in collaboration with the voluntary sector. Furthermore, we call on the Mayor to amend Policy GG3 to recognise: that spatialised economic inequalities play an active role in determining health inequalities; that advice services and community centres form part of the ecology of a healthy city; and that an Early Action approach can help to deliver a healthier, happier London.

Community Links (2017). Ready for Everything Communities. Available at: http://www.community-links.org/docs/community-links-strategy-booklet.pdf.

Mark Townsend (2018). Knife crime needs public health strategy, says London police chief. *The Guardian*, 6 Jan 2018.

Just Space. Towards a Community-Led Plan for London. p.31.

User: London national Park City Foundation

Creating a healthy city - Pages 16 - 17

LNPCF supports the intention to:

1.3.1 The health of Londoners is, to a large extent, determined by the environment in which they live. Transport, housing, education, income, working conditions, unemployment, air quality, green space, climate change and social and community networks can have a greater influence on health than healthcare provision or genetics. Many of these determinants of health can be shaped by the planning system, and local authorities are accordingly responsible for planning and public health.

1.3.2 The scale of London's health inequalities is great, and the need to reduce them is urgent. Healthy life expectancy is lower in more deprived areas, and the differences between parts of London is stark – more than 15 years for men and almost 19 years for women. London's ongoing growth provides an opportunity to reduce these inequalities, and delivering Good Growth will involve prioritising health in all London's planning decisions.

1.3.3 The causes of London's health problems are wide-ranging. Many of London's major health problems are related to inactivity. Currently only 34 per cent of Londoners report doing the 20 minutes of active travel each day that can help them to stay healthy, but good planning can help them to build this into their daily routine. Access to green and open spaces, including waterways, can improve health, but access varies widely across the city. Excessive housing costs or living in a home that is damp, too hot or too cold can have serious health impacts. A healthy food environment and access to healthy food is vital for good health. Good planning can help address all of these issues.

1.3.4 The Healthy Streets Approach outlined in this plan puts improving health and reducing health inequalities at the heart of planning London's public space. It will tackle London's inactivity crisis, improve air quality and reduce the other health impacts of living in a car-dominated city by planning street networks that work well for people on foot and on bikes, and providing public transport networks that are attractive alternatives to car use. It will also ensure that streets become more social spaces.

LNPCF supports Policy GG3:

To improve Londoners' health and reduce health inequalities, those involved in planning and development must:

1. Ensure that the wider determinants of health are addressed in an integrated and co-ordinated way, taking a systematic approach to improving the mental and physical health of all Londoners and reducing health inequalities.
2. Promote more active and healthy lifestyles for all Londoners and enable them to make healthy choices.
3. Use the Healthy Streets Approach to prioritise health in all planning decisions.
4. Assess the potential impacts of development proposals on the health and wellbeing of communities, in order to mitigate any potential negative impacts and help reduce health inequalities, for example through the use of Health Impact Assessments.
5. Plan for improved access to green spaces and the provision of new green infrastructure.
6. Ensure that new buildings are well-insulated and sufficiently ventilated to avoid the health problems associated with damp, heat and cold.
7. Seek to create a healthy food environment, increasing the availability of healthy food and restricting unhealthy options.

User:	London Beekeepers' Association
? Similarly, the requirement for improved access to green spaces and for new green infrastructure is cited in Policy GG3 - Creating a healthy city.	

User:	Public Health England

Creating a healthy city

? Healthy life expectancy at birth (Male) ? Healthy life expectancy at birth (Female) ? Life expectancy at birth (Male) ? Life expectancy at birth (Female)

Childhood Obesity

? Child excess weight in - 10-11 year olds

Mental health

? Self-reported wellbeing - people with a low satisfaction score

? Self-reported wellbeing - people with a low worthwhile score

? Self-reported wellbeing - people with a low happiness score

? Self-reported wellbeing - people with a high anxiety score

? Social Isolation: percentage of adult social care users who have as much social contact as they would like

User: Mama Ujuaje

The Food heritage of London is rooted within its deepest past - but in what way is this fact acknowledged in terms of how the planning of its built environment is spoken of and designed?

Engagement with food is a basic activity of all Londoners and the diversity of this engagement is embodied in the variety of food system practices Londoners engage in; from the curried eel and mash shop to the haute cuisine Latin American offerings of Soho, from the occasional herbal supplement trader to Fortnum and Mason's food counters. Some few may keep goats for milk and others grow lettuces underground, to cater for the salad eaters of the city. The range in London food cultures derives from often turbulent histories which also relate to the detailed designs of London architecture, the characters of the town centres and the ways in which decisions are made about London's spaces, writ small as well as in how opportunity areas are configured, so writ large.

Markets ancient and modern have defined the central layout of London, the need to access local breweries, and a good supply of milk, meat and bread for the nobility have shaped the spaces which we take for granted in the West End and in the City, the plantation investments of distant shores defined the location of gentlemen's clubs, coffee houses, hotels, inns and trading places. The internal docklands have received the bounties plundered by City exploits bringing in tobacco, sugar, cotton and chocolate and wholesale markets have grown up around the associated businesses. Even the educational institutions which were built for the elite to learn how best to extract from and protect British territories abroad, which largely consisted of plantation economies or natural resource extraction operations form part of the capital's current heritage and culture today.

Knowing this, it is not possible to think of the spatial planning of London, with respect to heritage and culture, without factoring in the heritage and culture of the city's food and the diverse populations who have made parts of London their own and conferred unique cultures of trade, music, arts and ways of relating with each other, unique to them and shaping the way in which a place is understood, not only by its longer term citizenry, but also by those who have moved in, in waves of new settlements across London, with varying degrees of intensity.

It is therefore quite disingenuous to speak of the historic culture and heritage of London without referring to these things, yet this is what this chapter has done. It sets the tone for a 'development' of London which ignores the culture of its current citizens and treats history, the idea of heritage and the sense of culture almost as boxed artefacts to be handled as one might preserve or conserve an archive, an artefact, a history that is now dead and past, not as the living culture and heritage that continues this London tradition of constant change and stable traditions, diversity and constancy, a creative interplay of identities: ethnicity/race, class, creed, belief and more.

In responding to this, food growing networks have the opportunity to seek to insert into this chapter how the heritage and culture of London ought to recognise food growing traditions, however modern or however ancient; those associated with local knowledge and those knowledges from shores a great distance away and seek to preserve them and their benefits they bring to the practice of growing as well as to the diverse communities of London. It might also argue that heritage and
culture are concepts that are ongoing, rather than static and so should be embraced by policies and plans pertaining to London which make use of reconsidered changes to the land and natural resources of the city, in light of new understandings of the environment and food growing practice, such as that referred to as agroecology, which promises a positive renewal and adaptation of food growing in the context of human land use.

The use of the term heritage and culture might also be referred to by London's food growing networks as needing to include and refer to London's food heritage (which is diverse) and understanding that much of London's current popular 'culture' revolves around food, its sourcing: local, its marketing: specialist, local farmer and 'fresh' and its consumption: specialist 'foodie'.

What this approach ignores, however, is the food culture of the lower and working classes, children and the elderly, disabled, ethnic minorities and homeless.

Food is arguably a more important factor in the well-being of this part of London's citizens than for others. A greater proportion of the income of the poor is spent on food than on any other basic household need.

https://www.ons.gov.uk/peoplepopulationandcommunity/personalandhouseholdfinances/expenditure/bulletins/familyspendingintheuk/financialyearendin

https://www.kelloggs.co.uk/content/dam/europe/kelloggs_gb/pdf/R3_Facts%20about%20Food%20Poverty%20ReportFINAL.pdf

What kind of culture exists and continues to emerge in relation to these groups and how able have food growing networks been in responding to these cultures and their food system demands or needs and how do such networks visualise any spatial planning to enable a more full response to this sector of London's humanity to be better met by a plan for London.

However, given that the plan is considering all of London's structures: housing, transport, green infrastructure, etc., each of which interfaces with different aspects of the food systems of London, (which are, in themselves, connected to the food systems of the nation and indeed the globe), London's Food Networks will need to ensure that its responses reflect the current realities of how different types of Londoners interface with the food systems held within London cultures and
researches and understands the factors which drive their development (or demise).

What, for example, is the response of food growing networks to the proposed closure of chicken shops and the narrative discourse around this policy move? Are they looking at the entire food system in which chicken shops sit: the supply chains, the alternative employment possibilities, the impact on where the ‘school pound’ is spent alternatively, the local economies, etc.? What might be the social impact assessment of a called for closure of chicken shops in a locality, especially one which involved the communities and other private/corporate agencies which are engaged in the food supply system for school children in the locality.

The awareness and pro-activity of a food growing advocacy network in holding this complexity is limited to how it frames its own work and the level of partnership it undertakes to foster with the range of institutions which represent other aspects of the food systems which feed all of diverse London.

So let us look at the specific policies under the London Plan Draft chapter on Heritage and Culture to see what might stand out for editing.

Firstly, what is the Good Growth framework policy that it sits in? From GG1 policy D

promote the crucial role town centres have in the social, civic, cultural and economic lives of Londoners, and plan for places that provide important opportunities for face-to-face contact and social interaction during the daytime, evening and night time.

And a suggested addition to GG2:

G. That, mindful of the need to optimise the use of space, intensification planning at borough level ensures there is sufficient social impact assessment to ensure changing land uses do not impact adversely those whose claims on the land have been hitherto less well represented. Furthermore no new land use should have the effect of displacing heritages and cultures that are part of what is widely recognised as giving London its special character as a ‘world city’.

And From GG5 policy F

promote and support London’s rich heritage and cultural assets, and its role as a 24-hour city. We can bear these in mind when considering the H&C policy recommendations:

Policy GG4 Delivering the homes Londoners need

User:	London Borough of Havering

Criteria C and paragraph 1.4.4

The draft London Plan should reference lifetime homes and the ability of any housing growth supplied to be adapted in the future to maintain independent living.

User: Royal Borough of Greenwich

GG4D

Object to the requirement to identify and allocate small sites. This is an onerous requirement that boroughs currently do not have the resources to do, and the process of allocating sites in development plans is at least two years. There are other ways in which boroughs can support additional delivery on small sites.

User:	Royal Borough of Greenwich

GG5E

Clarification is needed on the requirement to establish build-out rates at the planning stage. It is unclear how this could be secured as part of a planning permission.

User:	Network Rail

Network Rail is working hard to release as much land for housing as we can, supporting the aims of Policy GG4 of the Plan. Such land includes sites adjacent to railway line, stations or depots. Across the country, we will deliver land for 12,000 new homes by 2020 with about 5,000 of those being within London, and we will continue to deliver significant further land for housing after this date and for the duration of the Plan period. We are also working with the London Boroughs to play our part in areas identified as driving socio-economic growth across the city. The land-release programme is central to Network Rail's objectives to help respond to the nation's housing shortage. The delivery of these sites on railway land is far from easy, and in order to realise the full development potential, Network Rail requires the assistant and support of the Mayor and London Boroughs.

User: London Borough of Newham

LBN are generally supportive of the policy which is complementary to Newham's Draft Revised Local Plan.

However, LBN question the effectiveness and consistency of Paragraph E. It is not always appropriate to incentivise build out, particularly in the case of large sites where phasing may be synched with infrastructure delivery over a long time, and are more susceptible to changing market conditions, including availability of building materials/technologies/skilled labour.

The interaction between Paragraphs E and D must also be clarified; i.e. the effect of necessary infrastructure on setting ambitious build-out rates, particularly given often uncoordinated (sometimes due to legal constraints) short term planning and funding for infrastructure, and an insecure/insufficient infrastructure funding environment overall. Furthermore, this policy's accompanying text should address what 'planning for all necessary supporting infrastructure from the outset' means and who defines what is 'all necessary'. Infrastructure needs are often emergent, and the process iterative rather than linear. It is also not just a question of how much more housing infrastructure can enable, but how much more infrastructure more housing requires, given already significant cumulative deficits.

As already stated under policy GG2, LBN also question the lack of reference to strategic Green Belt review.

User: (FOE) Friends of the Earth England Wales and Northern Ireland

This policy sets out criteria those involved in planning and development would be expected to meet in order “To create a housing market that works better for all Londoners”. It is important that outdoor space is provided alongside and as an integral part of new housing. Policy GG4 is silent on outdoor space, yet this needs to be factored in from the outset when planning new development schemes otherwise provision can be overlooked or tokenistic. While we recognise that outdoor space in new housing is considered in Policy D4 (Housing Quality and Standards), it would be helpful to have some reference to outdoor space within policy GG4 given that this is fundamental to delivering the kind of homes that Londoners need.

User: Berkeley Group

2.3. We support incentives to support swift delivery (GG4). Many of our planning permissions include pre-implementation reviews, at appropriately agreed milestones, to provide comfort to planning authorities and the community that the homes will be quickly delivered. We commence development as soon as we are able to, but given the complex nature of our developments, this can be slowed by a number of factors such as achieving vacant possession, resolving rights to light claims, reaching agreements with neighbouring landowners, and securing servicing, power and access.

...

2.5. Policy GG4 should recognise this level of complexity and uncertainty:

Policy GG4 Delivering the homes Londoners need Policy GG4 Delivering the homes Londoners need

E Establish ambitious and achievable build-out rates at the planning stage, reflecting the nature and complexity of the proposed development, incentivising build-out milestones to help ensure that homes are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value.

User:	John Innes Society
GG4 We broadly support these policies but consider the word “ambitious” is unnecessary in GG4 E. Being “achievable” is what is important.	

User:	TUC London, South East and East of England

Policy GG4: Delivering the homes that Londoners need

1. The definition of ‘genuinely affordable’ should be explicitly given.
2. London has a massive construction skills shortage, this is both a challenge and opportunity and the benefits can be won by regeneration schemes that include skills development, apprenticeships and local employment schemes.
3. High technology high skilled off-site manufacture is a major opportunity for London both in terms of improving the built environment and the supply of homes, and in terms of business growth, employment and skills uplift. London the greater south east should be supported in ‘doing it’ rather than importing it. There is competitive advantage to be won.

User:	Neighbourhood Planners

Add wording shown in **bold**

Identify and allocate a range of sites, including small sites, to deliver housing locally, supporting skilled precision-manufacturing that can increase the rate of building, and planning for all necessary supporting infrastructure from the outset. **Neighbourhood plans can play a significant role in meeting this objective.**

User: Just Space

GG4: Delivering the homes Londoners need

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

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

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

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

<u>Changes to the policy:</u>

The first sentence should be changed along the lines of:

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

New points should be added:

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

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

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

Point C – Support diverse and inclusive communities

User: London Borough of Bexley

Policy GG4 Delivering the homes Londoners need states that all necessary supporting infrastructure needs to be planned from the outset and this is welcomed. However, it is essential that this infrastructure is not just planned for, but committed to financially, or even delivered, in advance of the levels of housing that are proposed. This is particularly relevant in Bexley where connectivity is very poor, often in areas identified for growth. ‘Planned’ infrastructure projects can be abandoned or significantly pushed back when they are no longer a key commitment by politicians at regional or national level. The suggestion repeatedly put forward in the draft Plan that the density of development proposals should be based on future planned levels rather than existing levels will inevitably lead to bad growth in localities with communities that will struggle economically if the planned infrastructure is never delivered.

Policy GG4 also proposes that London boroughs should establish build-out milestones using all the tools at their disposal to ensure that homes are actually built after permission is granted. It is not clear what tools are being referred to and what legislation supports this approach, as government has not committed to giving local planning authorities any additional powers in this matter.

User: Future Cities Catapult

4. Viability and data benchmarks

4.1. There is difference in access to data between the major developers and their consultants, and public planners, smaller developers and the public. This is one of the causes of the ill-functioning housing and land market, which leads to the appearance that the planning system is not delivering the quantum and quality of development required to support London's position as a leading World City. One of the biggest barriers to more transparent and consistent viability assessments is the lack of a standard format for submission of viability data. That alongside the confidential nature of viability reports means that there is not enough data to generate robust benchmarking figures to support planners when evaluating assessments. In light of the above we would recommend amendments to the following policies:

4.2. Policy GG4 - Delivering the homes that Londoners need, part E states that those involved in planning and development must:

"Establish ambitious and achievable build-out rates at the planning stage, incentivising build-out milestones to help ensure that homes are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value."

4.3. Though we fully support the policy, we suggest the addition of a requirement to standardise the method and data which is collected and make viability more open through the use of benchmarks to allow for this policy to be implementable. It is vital for the collection and sharing of data to be established early on in the process so that it can make these targets achievable.

4.4. We strongly support the inclusion of standardised and accessible viability information to be submitted as part of the Viability Tested Routes for planning applications as detailed in Policy H6 - Threshold approach to applications - Part E. It is essential to create a detailed standard for this data, particularly for those variables that are critical in determining viability, such as land price, expected sales values, etc. Viability assessments can and usually are updated during the viability process as new and updated data becomes available or as the development proposal is developed more in detail. In order to keep the data accurate as possible, viability assessments should have their dates made public.

4.5. Policy DF1 - Delivery of the Plan and Planning Obligations, part D sets out priorities in planning obligations should a site not be able to be seen as viable. In that respect we believe a more integrated approach to viability assessments which allows officers to compare the impact of multiple applications that ‘do not meet the threshold’ or cannot deliver all planning obligations due to viability is needed.

4.6. If these could be compared across a singular platform we’d have a better understanding of development impact. Paragraph 11.11.1 reiterates how the assessment of viability on a site-by-site basis has undermined the deliverability of plan objectives and increased land value. We agree and support change to policy to require all viability data to be shared - this would not compromise the confidentiality of the data if it were to be stored in one place, used to create benchmarks, and where different users have different levels of access to this data.

User: Kennington Oval and Vauxhall Forum (KOVF)

12 In our view, liquidating the housing backlog over 25 years (as the SHMA tries weakly to justify at para 6.15) is just kicking the can down the road. Consistently with NPPF para we think a 65% affordable target should be brought in now, not dithered about in 2021, with a 90% low cost rent/10% intermediate split. As an incentive to developers, the viability-study-avoiding “Fast track”, proving so attractive to our developers (to judge from KOV experience), should forthwith be amended to allow, for the next ten years, fast track (without viability study) to developments providing 50% affordable housing, with a 90% low cost rent/10% intermediate split, which if vigorously implemented over 10 years would significantly ease London’s current housing crisis. This approach should be reviewed in the light of results, in time for any refinement of the policy to be brought in after that first 10 years of application. **Policies GG4B and H5 H6 and H7 should be amended accordingly**

(Please see full document for more detail)

User:	Federation of Small Businesses

We must first establish a realistic definition of affordable housing based on earnings rather than property market values.

Over a quarter (26 per cent) of FSB members said that the cost of housing will have a negative impact on their business [up to 2020], so they want to see a realistic housing plan that truly reflects an affordable housing policy.

User:	Federation of Small Businesses

We support the move in the London Plan for further support for small and medium sized housebuilders. We must take into account the higher build costs of small housing developments, when setting the levels of developer contributions such as CIL.

User:	Association for the Conservation of Energy

Policy GG4 Delivering the homes Londoners need

ACE agrees with the Mayor that homes need to be well-designed and good quality, safe, environmentally sustainable, accessible, and inclusive of Londoner's diverse housing needs. ACE would recommend that the Mayor considers a broader definition of affordability within the London Plan, Housing Strategy and GLA programmes in the future: homes should be affordable to rent or buy and live in, and homes should therefore meet the highest energy standards possible in order to minimise running costs.

User:	Redington Frognal Neighbourhood Forum

GG4 C Delivering the homes Londoners Need. The wording should be strengthened to afford greater protection to conservation areas. We suggest point C of the policy text box (page 19) should be re-written to read:

GG4 C “Create mixed and inclusive communities, with good quality homes that meet high standards of design, and provide for identified needs, including for specialist housing, and respect local distinctiveness, preserving and enhancing heritage assets.”

User:	Redington Frognal Neighbourhood Forum

GG4 D The following additional sentence at the end is proposed:

“Neighbourhood plans can play a significant role in meeting this objective.”

User:	Ministry of Housing, Communities & Local Government

The Annex to the Secretary of State's Letter in response to the draft London Plan consultation refers to wanting to understand further the evidence that has underpinned the Mayor's choice of thresholds for affordable housing provision on developments on public and industrial land.
We have heard some concerns that there could be additional costs of development for housing sites on former industrial land, especially where the industrial floorspace is being retained. This could make a 50% affordable housing level difficult to achieve. We would be interested to see any specific assessment you have made on whether this could impact on the viability of development on this type of land.

User: Revo

We agree that the issue of housing remains at the top of the Mayor's agenda and his commitment to increasing housing supply in London is welcome, and facilitates footfall, job creation and sustainable community – but we would also argue that good housing does not exist in a vacuum. The Mayor's target of 66,000 net new homes a year (up to 2030) is ambitious and using all the tools and innovative solutions available will be needed to achieve these targets.

Revo believes we have much to offer in assisting the Mayor's Office in understanding the potential of urban locations, such as town centres and edge-of-centre and out-of-centre retail locations to contribute to increasing housing supply; and, most importantly, balancing this against the wider needs of communities in terms of access to retail and leisure facilities and the demand for employment space, and the need to protect and plan for some uses that might be incompatible with housing uses.

The draft Plan is, however, a positive step to providing Londoners with decent and affordable homes to live in and provides a good framework to help delivery. It is important to see that the delivery of homes is not seen as independent from the places where they are built, and that good and well-designed quality accommodation can hugely contribute to a sense of community and place – and we support the Plan's recognition of this.

While issuing housing challenges to the boroughs, policy-making must still be approached in a joined-up way, and across borough / political delineations which do not exist in the minds of users / consumers, so that town centres thrive, encourage diversity of retail and commercial uses and more effectively integrate housing in the way that people use the places they live.

We support achieving higher density development in urban locations (including in and around town centres and in other retail locations) whilst recognising this creates many challenges, and ones that many of Revo's members are very familiar with. Further investigation should also be given to viability and land assembly issues which often stand in the way or significantly delay realising latent potential.

As previously acknowledged, town centre and brownfield regeneration remains inherently challenging. We believe the Mayor's Office should encourage a more flexible approach to affordable housing, both in terms of overall quantum and affordable housing tenure – particularly in light of the ambition to have 50% affordable housing delivery on public sector portfolios (H5(A)(4)) irrespective of the type of site and place in its wider context; moreover, the definition of public sector land highlighted at para 4.6.5 ('land that is owned or in use by a public sector organisation, or company or organisation in public ownership, or land that has been released from public ownership and on which housing development is proposed') could be particularly burdensome for developers who wish to develop sites previously owned by public bodies, as the need to ensure Local Authorities achieve the best value for their sites, combined with the Mayoral request for 50% affordable housing, could detrimentally hinder the viability of such schemes.

We have also previously advocated for a policy which is clear that Affordable Private Rented (APR) homes are an acceptable form of affordable housing tenure, as part of Build To Rent (BTR) schemes which the Government has set out its intention to do. We believe this will ultimately allow developers and landowners to bring forward sites in hitherto unviable locations and increase the supply of affordable homes in good quality locations in London's boroughs.

User: Roca Investments

Discretionary Social Housing Relief

The Mayor is asked to consider the use of Discretionary Social Housing Relief (DSHR) to encourage more innovative affordable housing models to come forward and help deliver more housing. . At present due to the wording of the CIL Regulations only social and affordable rented housing, intermediate rented housing and shared ownership housing benefit from mandatory SHR. There are very few examples where a Borough has enacted DSHR. This adds significant cost to developers
wanting to deliver other forms of genuinely affordable homes for young people, single households and older household requirements. Smaller households are often better suited to be delivered as
part of mixed use sites (particular smaller sites).

We would welcome the Mayor leading by example and enact DSHR on Mayoral CIL. This would encourage and incentivise boroughs to do the same. This would potentially deliver more housing and jobs and contribute to infrastructure via CIL.

User: British Property Federation

We are pleased to see that the issue of housing remains at the top of the Mayor's agenda and his commitment to increasing housing supply in London is hugely welcome. The draft London Plan (LP) is an important step in helping to provide Londoners with decent and affordable homes to live in and provides an excellent framework to help deliver the homes that are needed. We are particularly pleased to see that the delivery of homes is not seen as independent from the places where they are built, and that good and well-designed quality accommodation can hugely contribute to a sense of community and place.

We are encouraged to see that the LP acknowledges that London cannot be treated as a homogenous housing market and for delivery of housing to be successful, a local approach is required and working closely with the London boroughs will ensure that delivery is targeted and appropriate for that area. Furthermore, we very much welcome the approach of using all means available to provide homes; the development of brownfield land and use of small sites will be key. We have long-supported the idea that much more could be made of land in and adjacent to existing town centres; development here should be encouraged wherever feasible to provide truly mixed-use communities.

The Mayor's target of 65,000 new homes a year for the next 20 years is certainly ambitious and using all the tools available to support delivery will be paramount. A multi-tenure approach must be part of this target; Build to Rent and raising housing standards more generally in the private rented sector will both have a significant part to play.

User: Watkin Jones Group

Policy GG4 Delivering the Homes Londoners Need

This policy is supported, specifically the proposed identification and allocation of small sites for development to assist in the delivery of residential development. The Watkin Jones Group consider that the use of suitable and accessible small sites within already densely populated urban areas can prove to be a significant source of additional housing needed to meet the needs of Londoners. These sites are often in locations that are highly accessible and therefore require less facilities including car parking.

User:	Business for London

Balance between Housing and Economy. The Plan rightly gives a lot of attention to the provision of new housing, and especially affordable housing. However, it does not give the same detailed attention to the provision of employment space, and affordable work space. For example, GG 4 says the Plan will “identify and allocate” land for housing but GG5 is much vaguer, vis “plan for *sufficient* employment and industrial space...” Also tables 4.1 and 4.2 list specific targets for the number of houses to be built each year in each Borough but the nearest equivalent (Table 6.2) for industrial space limits itself to one of 3 non-specific options (limit release, or retain capacity or provide capacity).

User: Bell Cornwell LLP

The proposed housing target in the New Draft London Plan does not follow the conventional method of calculation, and it therefore unsound as it is not consistent with national policy.

There is a lack of comparison of the GLA projections and the DHCLG projections for calculating housing need. Given the Planning Practice Guidance has been in effect for several years, the New Draft London Plan needs to take this into account. Further evidence over a longer plan period and justification is required on the final figure.

Given the anticipated publication of the new National Planning Policy Framework very shortly after the end of this consultation period, it is recommended that the option for adopting the standardised methodology is considered and compared against the current proposed housing target. The standardised methodology in its published form would be as a result of the Government's own consultation process. With its emphasis on affordability it should be of particular relevance to Greater London. There would be much benefit in a standard approach to calculating housing need across London, and the wider area.

There is a lack of certainty in the SHLAA on how and where housing will be delivered, where the assessment stretches the guidance on undertaking the SHLAA with regard to large site capacity and phasing, and on the inclusion of windfall sites beyond the 5-year period set out in the guidance. It is not clear why the London SHLAA is undertaken at such a high level.

It is recommended that SHLAAs are done by the relevant planning authority, with their local experience, knowledge and own understanding of the local area. This in turn, as with other local planning authorities, would inform their site allocations part of their Local Plans. If the SHLAA is undertaken at such a high level across London, without the local knowledge, it is questionable whether the land supply and site allocations will be deliverable or achievable at the proposed rate. This is a significant flaw in the approach of the New Draft London Plan, as well as the lack of strategic planning on the distribution of potential housing land supply in relationship to the housing need of a particular area. There does not seem to be any correlation to the land supply of an area and the housing need, calling into question the ability of the New Draft London Plan to deliver the proposed 65,000 dpa.

User: London Wildlife Trust

We recognise the need to plan to build a higher number of homes. However, without careful planning and design this has the potential to place further strain on London's natural environment. We would wish to work with the Mayor to ensure that opportunities to protect and improve the environment, and to mitigate any risks, are taken in delivering new homes on both on small sites and major developments. To this effect we have already contributed to the London Assembly Housing Committee's recommendations to this effect.6

6 London Assembly, At Home with Nature Encouraging biodiversity in new housing developments, January 2017

User:	London Wildlife Trust

We are, however, concerned that there appear to be no commitment to environmental standards for design and construction. Part C needs to be amended to:

C Create mixed and inclusive communities, with good quality homes that meet high standards of **environmentally sustainable** design and provide for identified needs, including for specialist housing.

User: Apex Airspace Development

The lack of supply of the homes that Londoners need has played a significant role in London's housing crisis. The 2017 London Strategic Housing Market Assessment has identified a significant overall need for housing, and for affordable housing in particular. London needs 66,000 new homes each year

The pull of London as a cosmopolitan hub is increasing the population by a rate that the city can't cope with. It is crucial that this demand is met by quicker supply and currently policy does not act cohesively to allow large construction projects to increase the supply by traditional construction methods. By using modular method of construction we reduce construction time and costs in the urban areas this gives the potential to increase the volume of homes delivered per year. As Modular buildings are delivered 90% complete to site the speed from installation to occupancy is 10 fold the speed of traditional construction methods. Airspace developments using this approach can help create significant inroads to the figure of 66,000 units per year.

We welcome the London plans acknowledgement that existing houses must not be left empty and that private landlords should offer up properties it cannot renovate as affordable housing. The airspace model can help unlock value in these homes and actively encourage refurbishment and renovation using the untapped capital to fund such works.

User: East of England Local Government Association

Councils in the East have concerns that:

- Whilst the new Draft London Plan goes up to 2041 and contains an ambitious 10 year housing supply, it is less clear across the policies what will happen with housing in the longer term.
- **Missing 1,000 dpa (dwellings per annum)** - the Plan identifies a need for 66,000 dpa and considers it has capacity to (and contains specific policies and targets to) deliver 65,000 dpa. The previous London Plan, which similarly failed to proactively plan specifically for the level of identified need (but in that case the gap was 7,000pa), contained policy wording ('*Boroughs should draw on the housing benchmarks in table 3.1 in developing their LDF housing targets, augmented where possible with extra housing capacity to close the gap between identified housing need…..*') that sought to encourage London Boroughs to exceed their specific housing targets to make inroads into managing the 7,000pa shortfall between 'need for' and 'plan for'. The current draft Plan contains no such wording. What is the approach of the London Plan to the 'missing 1,000 dpa'?
- **Level of housing need –** for the purposes of identifying a level of housing need to plan for within the Plan, assessed housing need has been identified for the period 2016-2041, averaged out to identify an average annualised figure and then that annual average applied to the ten year period 2019-2029. That 25 year average annual figure is 66,000pa. But if one looks at the need for the period 2016-2029 – the housing timeframe of the Plan - it appears that need rises by at least 10,000pa. Clarification on this matter has been sought from GLA but at the time of writing has not been received. If correct, this potential shortfall of provision planned for against need has potentially significant implications both for London and areas beyond. The Plan preparation process needs to clarify if this position is indeed the case and if it is, justify why it is not appropriate to meet the assessed level of need, as well as identify the likely consequences of not meeting it (see **Appendix 1).**

- **Housing delivery failure? -** The Further Alterations published in 2015 identified a housing need of 49,000 dpa and a housing target of 42,000 dpa. In practice, London struggles to deliver half of its need and a recent high in delivery in 2014/15 of 32,440 was still 17,000 dpa short of the annual level of need and 10,000 dpa short of the extant London Plan target. In the period 2001/2 to 2014/15 average annual housing delivery within London was 27,444 dpa. Housing delivery failure against London Plan targets is a consistent and ongoing theme. There would clearly be a range of potential serious consequences if housing delivery within London continues to fail – both within and beyond the capital (exacerbating the tendency to migrate, increasing commuting, increasing migration assumptions within official population projections, etc). Given the scale of the challenge ahead it would seem prudent to plan for the possibility of failure and the Plan is not as clear as it might be in terms of what would happen were failure to materialise. The Mayor of London himself recognises that the London housing crisis *'……..is unacceptable and I am determined to make a difference. I have been honest with Londoners from the start – we are not going to be able to turn things around overnight. This is going to be a marathon, not a sprint. But we are working hard every day and we have already started to take big steps forward' (Foreword, London Housing Strategy September 2017)*. Even the Mayor does not appear to expect a significant change in the short and even perhaps medium term.
- Informally the GLA has confirmed that were housing delivery within London to continue to fail, this would be dealt with by a review of the London Plan, not by placing expectations upon local authorities beyond London. Despite this, however, it is possible to envisage a scenario in which local planning authorities bringing forward local plans beyond London are pressurised by some parties, and perhaps asked by Inspectors, to explain how they propose to address housing delivery shortfall within London – are they to uplift their housing targets? Given this potential eventuality, confirmation is required within the Plan (probably within both policy and supporting text) that housing delivery failure is a matter for London and would be dealt with by means of a review of the Plan. It may also be appropriate for the Plan to include a trigger point for such a Review – a specific number of years of failure, for example – supported by appropriate monitoring frameworks and policy wording to set out contingencies/actions in the event that delivery falls short of housing and infrastructure policy requirements. This would demonstrate how London is progressing on its ambitions and avoid the risk of unintended and unplanned consequences beyond London.

User: Community Led Housing London

Furthermore *Policy GG4 Delivering the homes that Londoners need* aims "to create a housing market that works better for all Londoners". Community led housing is not only diversifying the housebuilding sector, it can make a significant and distinctive contribution to increasing the supply of genuinely affordable housing in London, with the added social benefits.

There are a growing number of community led housing projects in London, with several reaching completion. This reflects increased interest nationally, despite a number of greater hurdles in London. Community led housing is far more widespread in other countries, notable examples include Vauban in Freiburg and various ‘baugruppen’ in Berlin and Hamburg. These projects demonstrate the scale and density achievable in urban areas, often with varying degrees of support from local and regional government. Further detail on examples in London, the UK, and internationally can be provided upon request.

The Mayor is supportive of community led housing in his Housing Strategy. However paragraph 5.47 notes "Groups who wish to develop community-led housing schemes face a range of challenges. In particular, they may struggle to access suitable and affordable land, finance, and people with the necessary skills and experience to take a proposal through from conception to delivery."

As set out in the Housing Strategy, the Mayor is funding community-led housing projects, as well as self-build and custom-build projects, using his Innovation Fund, and lobbying Government to allocate a share of the Community Housing Fund. This will go towards addressing finance challenges.

The Mayor is also funding a new Community-Led Housing Hub, which primarily aims to address issues of skills and experience (see Box 10 of the Housing Strategy).

The London Plan has a key role to play in addressing the challenge of "access [to] suitable and affordable land". This does not appear to be adequately fulfilled in the current draft Plan despite the references and support in other statutory strategies.

User: 313-349 Ilderton Road LLP

Policy GG4 Delivering the homes Londoners need sets out criteria to create a housing market that works better for all Londoners.

We support the encouragement of housing development and the policy aim to identify and allocate a range of sites, with a focus upon deliverability. However, the stringent 50 per cent target delivery for affordable housing must be carefully assessed against viability and deliverability of development. The London Borough of Southwark for example currently preside over a 35 per cent target for affordable housing delivery which has been adopted following studies through the Development Plan evidence base. The upward provision totalling 50 per cent as suggested by the draft policy could seriously prejudice the delivery of development schemes and act as a deterrent to development thus conflicting with the overarching policy aim of “delivering more homes Londoners need”.

The Mayor’s affordable housing policy is assessed later in this Representation.

User: Catalyst Housing Limited

CHL supports the principle of retaining and identifying new Opportunity Areas, given their significant capacity to accommodate growth. CHL also supports the general principle of locating key growth locations in close proximity to existing and/or planning transport infrastructure.

Draft Policy SD1 is based upon the principle of ensuring that Opportunity Areas are planned so as to unlock their full potential for accommodating growth. In order to achieve this, the draft policy and supporting text refers (inter alia) to the following to help to maximise their potential:

- Planning frameworks
- Identifying specific infrastructure requirements
- Integration with Local and Strategic Areas for Regeneration (with cross-references to draft Policy SD10)

- Requiring major investment in transport
- Cross-boundary working within growth corridors

Whilst these are undoubtedly helpful in terms of ensuring the potential of Opportunity Areas is maximised, there is a real risk of the requirements – either alone or in combination – giving rise to at best significant delays to, and at worse entirely inhibiting, delivery. The Plan itself recognises the uncertainty that exists in terms of sources of funding for the infrastructure that is necessary to provide for the scale of growth anticipated.

It has to be assumed that there will be a significant time lag to delivery and as these areas account for a substantial source of housing land supply, there are concerns about an interim strategy, given the need for 66,000 new homes per year, every year for at least 20 years [we note that part B of draft Policy D6, which relates to optimising housing density, gives rise to similar challenges in terms of the time lag between now and the provision of necessary infrastructure]. It is clear that the Mayor acknowledges this risk, given the reference in the supporting text to the potential for a phased approach (also in relation to draft Policy D6 too), as well as supporting text to draft Policy GG4 which identifies Opportunity Areas for longer-term delivery.

Phasing may enable some of the capacity of some Opportunity Areas to be realised earlier on in the Plan, but in general CHL considers it more likely to form a supply of land in the longer-term. The policy requirements and guidance contained within the supporting text relating to Opportunity Areas needs to be very carefully considered, and further information is needed (for example to explain the approach to cross-boundary working) in order for these locations to come forward. For the interim period, the Mayor needs to carefully consider the approach to ensure that opportunities are maximised from other sources of supply.

User: Silvertown Homes

We agree that the Mayor should be responsible for carrying out the objective assessment of need (OAN) for London as a whole, rather than the 35 LPAs.

However, the GLA should calculate its housing need using the ‘standardised methodology’ set out in the DCLG’s Planning for the Right Homes in the Right Places consultation, to be consistent with rest of the country.

The Draft Plan should be amended so the housing need iscalculated using the government’s standardised methodology for calculating the objectively assessment of housing need.

User:	Silvertown Homes

In view of the recognised housing crisis in London, this policy should make it clear that there is a presumption in favour of delivering all newly proposed residential homes, including small sites and unallocated brownfield land.

Amend policy to include an additional sub-section referencing that there is a presumption in favour of delivering residential or residentially led mixed use development.

User:	Benhill Residents

(A) Delivering more homes without specification of types or tenure of homes, does not, in practice deliver the homes that are actually needed.

(B) We assess that only a very small percentage of homes that the Mayor deems to be ‘genuinely affordable’ will be affordable to households that have below median income levels.

(C) There is a real danger, particularly in Opportunity Areas and other large-scale developments, that new communities are being created comprising households mostly with above the median income levels living in one and two-bedroom homes – that is neither mixed or balanced communities.

User: Elaine Chambers

GG4 Delivering the homes that Londoners need

(A) Delivering more homes without specification of types or tenure of homes, does not, in practice deliver the homes that are actually needed.

(B) We assess that only a very small percentage of homes that the Mayor deems to be ‘genuinely affordable’ will be affordable to households that have below median income levels.

(C) There is a real danger, particularly in Opportunity Areas and other large-scale developments, that new communities are being created comprising households mostly with above the median income levels living in one and two-bedroom homes – that is neither mixed or balanced communities.

User:	Reigate and Banstead Borough Council

The council supports GG4 - Delivering the homes Londoners need - including the delivery within London of not-for-profit rented homes, social rented and community-led housing, particularly on land owned by the GLA Group and Local Authorities

User: Earls Court Public Sector Tenants' Assoc

A. Delivering more homes without specification of types or tenure of homes, does not, in practice deliver the homes that are actually needed.

B. We assess that only a very small percentage of homes that the Mayor deems to be ‘genuinely affordable’ will be affordable to households that have below median income levels.

C. There is a real danger, particularly in Opportunity Areas and other large-scale developments, that new communities are being created comprising households mostly with above the median income levels living in one and two-bedroom homes – that is neither mixed or balanced communities.

User:	Orbit

Orbit strongly supports the creation of mixed and inclusive communities. There should be a recognition that in many cases this will need to include the introduction of market homes in deprived areas where there is a concentration of social housing.

Orbit considers that ‘Genuinely affordable’ does not necessarily always have to mean London Affordable Rent and that in certain locations other types of housing tenure can be considered ‘affordable’ including market sale homes. This will also lead to creating more mixed and balanced communities.

For instance, within Orbit’s Erith Park development market sale properties are priced at c.£265k for a two-bedroom flat, which would be affordable for households on an annual income of £53k. With Help to Buy, the unit would be affordable for those households on an annual income of £37k.

The Mayor expects intermediate rented homes to be affordable for those earning less than £60k. As demonstrated by the above figures, outright sale could be an option for those seeking to buy in certain locations within Bexley. As such, there should be a recognition that market sale and intermediate products could also be genuinely affordable within Outer boroughs in London which have lower house prices.

User: Lands Improvement Holdings

Policy GG4 Delivering the homes Londoners need

To realistically achieve higher levels of affordable housing the London Plan must look for new solutions beyond just brownfield sites, which have failed to deliver in the past (both affordable and market housing).

London needs space to grow. There are not enough brownfield sites to meet London's projected housing needs as it is. Brownfield sites are also unevenly distributed, expensive to redevelop (due to viability challenges) and are often restricted in terms of the types of housing they can accommodate.

By their nature, brownfield sites are limited in the affordable housing they can reasonably be expected to deliver (in terms of overall quantum, location and type). This is evidenced by the low levels of affordable housing achieved in London over recent years. Most major brownfield schemes in London fail to even achieve the Mayor's 35% threshold target

In 2015/16 there were 6,675 affordable homes built (17% of all new homes built) against a 50% target of 21,195 affordable homes (London AMR 2015/16). That is a shortfall of over 14,500 affordable homes in a single year.

This is not unsurprising or unreasonable as these brownfield sites deliver other transformational benefits (eg transport infrastructure, bringing contaminated land back into use, jobs, schools etc) which cost money and require a pragmatic approach to affordable housing to ensure schemes are viable and come forward.

To offset the lower levels of affordable housing commonly achieved on brownfield sites and deliver the level of affordable homes Londoners need, which is the purpose of Policy GG4, a broader range of sites should be identified. This should include strategic urban extensions in the Green Belt where they are not environmentally valuable, well-connected to existing communities by existing or planned public transport and could deliver a significant proportion of affordable housing.

Change sought to Policy GG4

The wording of Policy GG4 should be amended as follows (or words to the effect of):

"…

E. ~~D.~~ Identify and allocate a range of sites, including small sites ***and, where appropriate, larger strategic allocations,*** *to deliver housing locally, supporting skilled precision-manufacturing that can increase the rate of building and planning for all necessary supporting infrastructure from the outset.*

…"

User:	Bishopsgate Goods Yard Regeneration Limited
Our client supports the aspirations of the draft London Plan to ensure more homes are being delivered.	

User: Camden Town Conservation Area Advisory Committee

GG4 (C)

Draft policy: ‘Create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing.’

Our proposed amendments – reasoning: we welcome the creation – and continuation – of inclusive communities, and of high standards of design. Both require an understanding of the distinctive sense of place in each location. Our proposed revised text would help ensure the success of this policy, and achieve consistency with rest of the Plan, and with the Plan’s stated heritage objectives.

Our proposed revised text: ‘Create mixed and inclusive communities, with good quality homes that meet high standards of design, ~~and~~ provide for identified needs, including for specialist housing, <u>and respect local distinctiveness, preserving and enhancing heritage assets</u>.’

User:	Natalya Palit

Paragraph 1.4.5 states “Small sites in a range of locations can be developed more quickly, and enable smaller builders to enter the market.” This is not always true. Small sites can often have complex issues to be resolved, non-planning consents, such as utilities and highways consents required can take just as long to obtain, the planning negotiation on small sites for ‘minor’ developments can often take just as long as larger schemes of hundreds of homes, which avoid many of the intricate challenges faced by small sites as they can begin to create their own character at the centre of sites.

User:	Natalya Palit
Paragraph 1.4.6 suggests boroughs should use all of the tools at their disposal to encourage homes with consent to be granted; these tools should be clearly set out to help encourage boroughs to employ them.	

User:	Buckinghamshire District Councils & Bucks Thames Valley Local Enterprise Parthership
? We fully support the Mayor's ambition to achieve a step-change in housing delivery in London. (Draft London Plan Policy GG4)	

User: Old Oak Park Limited

There is an inherent tension between elements A and B of this policy. Delivering more homes overall requires a measured approach to affordable housing, ensuring that viability and delivery factors for each site, and in particular for larger, more complex regeneration projects, are taken into account. Whilst providing as much affordable housing as possible is of unquestionable importance, requiring a level of affordable housing that goes beyond that which a development can viably provide has the potential to impact on the delivery of all homes. An unviable scheme will not proceed. We do not consider that this would be beneficial for London, and therefore encourage a measured approach to affordable housing requirements.

Part E of this policy seeks to establish ambitious and achievable build-out rates at the planning stage, incentivizing build-out milestones. We do not agree with introducing stipulations on build out rates through the planning system, as they add yet another matter for negotiation and more requirements for development schemes to meet. It is unlikely that build-out rates can be set with confidence by a developer at the planning stage, when a scheme is not sufficiently progressed to enable realistic predictions. Notwithstanding our objection, if build out rates are to be set through the planning process, we would encourage further clarity on what incentives may be provided, but would strongly discourage any suggestion of penalties if build-out milestones forced upon a developer at the planning stage are not subsequently achieved. Setting build out rates will not succeed unless the procedural hurdles to delivery are also reduced – this includes the burden of information and documentation imposed by the planning system, and in this regard the Draft London Plan promises to impose more burden than the current Plan which could impact negatively on delivery.

RECOMMENDATION: Either remove the requirement to establish ambitious and achievable build out rates or clarify how their achievement is to be incentivized.

User:	Elephant & Castle Properties Co Limited

Policy GG4 – Delivering the homes Londoners need. We support this policy and note that the proposals for Elephant & Castle deliver a significant element of new high quality homes, of which affordable homes are also delivered on-site.

User: Persimmon Homes

We concur with the HBF that ‘The objectively assessed housing need for London (OAN) is unsound because it is not positively prepared. This is because the derivation of the OAN is:
a) contrary to established practice for assessing the OAN;
b) inconsistent with the Government’s proposed standardised approach to assessing housing need; and
c) unjustified in terms of the demographic and backlog assumptions underpinning the assessment’.
We note the HBF’s view that the OAN for London should be the uncapped requirement of 95,267dpa based on the Government’s proposed standard method.

Accommodating housing need

The London Plan is unsound with regard to its assessment of London’s housing capacity. It is unsound because its assessment is unjustified when the evidence is considered and ineffective because the London Plan is undeliverable.

We have concerns regarding the evidence that London will be able to provide 65,000 dpa. The SHLAA (2017) supporting the London Plan is principally a theoretical assessment of notional capacity and as such does not provide sufficient evidence based on the identification land and its assessment as to whether it is deliverable or developable in line with para 47 of the NPPF.

A very large element of growth identified in the SHLAA (2017) relies on notional assessments of capacity and the contribution of unidentified sites. It fails to satisfactory demonstrate that the London Plan’s housing targets can be met. We consider this to be unsound and gives rise to a significant risk that plan targets will not be met.

28.7% of London’s housing land supply is proposed to be derived from unidentified small sites. This is a notional figure not based on identified sites and as such comprises a ‘windfall’ allowance. However, the SHLAA (2017) makes an allowance for ‘small sites’ plus a further allowance for ‘windfall’, which in essence is double counting. The double counting of ‘windfall sites’ is not sound.

Managing the five year land supply and possibly the Housing Delivery Test

It is unclear how the London Plan and the adoption of new housing targets from 2019 will translate into a five year housing land supply.

LPA's in London are at various stages of plan preparation. It remains unclear whether the mayor expects LPA's to immediately revisit their adopted or emerging Local Plans. Clearly, there will be a significant time lag as development plans are prepared, consulted upon and adopted.

There is not sufficient allocated site's in order to deliver a five year housing land supply against the new London Plan targets. This will be compounded by the time lag as local development plans are updated.

If delivery rates are not achieved from 2019, it is unclear how this will be remedied in sufficient time to ensure that the shortfall could be made-good so that London's overall housing will be provided for by 2029.

If a London Borough cannot identify sufficient land in their development plans to meet the London Plan targets, as has been the case in the past, it is also unclear how this shortfall in housing provision would be addressed.

We share the HBF's concerns that at present there is no effective mechanism in place to monitor housing delivery and address what are evident shortfalls in delivery against London Plan targets. If under delivery persists, albeit against higher housing targets, without effective measures to address under delivery London will fall short of meeting it housing needs. Given that London is the driver for growth within the wider south east and is planning to delivery around 25% of the Country's housing, it should not be allowed to fail. Therefore, it is imperative that measures are in place to address undersupply against plan targets.

We share HBF's concerns regarding para 4.3.3. The Mayor should not seek to preclude London Local Authorities from applying the Housing Delivery Test if this is introduced by central government. The Housing Delivery Test will assist in maintaining housing delivery and as such the objectives of meeting London's Housing needs. The Delivery Test cannot be circumvented by the London Plan. This statement should be removed as it is unsound because it is inconsistent with current
national policy in terms of the five year housing land supply, and emerging national policy in the form of the Housing Delivery Test.

The unmet need

The London Plan is unsound because it is not positively prepared as it does not be ignored as proposed. The Mayor needs to go beyond his responsibilities of merely provide a plan that will address the unmet housing need. The unmet housing need of 10,000 dwellings over the period 2019-2029 should not consulting authorities outside London and come to an agreement as to how any unmet housing need is to be met.

User: Persimmon Homes

Policy is unsound because it is not clear

We support the intention of Part E to incentivise build out; however, the policy is not clear and therefore is unsound. We are concerned that this will not be achieved through positive incentives, but through the threat of penalties or more onerous obligations. It is considered that this could have the opposite effect to that desired, discouraging investment and leading to a more cautious and risk adverse approach. To be effective, incentives should be considered for early delivery, such as reducing
the ceiling for affordable housing in the final stage development review.

User: Legal and General Capital

Policy GG4 Delivering the homes Londoners need

The Mayor’s strategic target of 50% of all new homes being affordable will not to be achieved based on the draft London Plan. To realistically achieve higher levels of affordable housing the London Plan must look for new solutions beyond just brownfield sites, which have failed to deliver in the past (both affordable and market housing).

London needs space to grow. There are not enough brownfield sites to meet London’s projected housing and employment needs as it is. Brownfield sites are also unevenly distributed, expensive to redevelop and are restricted in terms of the types of housing and employment uses they can accommodate.

By their nature, brownfield sites are limited in the affordable housing they can reasonably be expected to deliver (in terms of overall quantum, location and type). This is evidenced by the low levels of affordable housing achieved in London over recent years.

In 2015/16 there were 6,675 affordable homes built (17% of all new homes built) against a 50% target of 21,195 affordable homes. That is a shortfall of over 14,500 affordable homes in a single year.

User:	Durkan

In addition, Policy GG4 (Delivering the homes Londoners need) outlines that build-out milestones should be incentivised to help ensure that homes are built. Local authorities should pro-actively support applications for appropriate development and ensure that officers respond to applications and queries in a timely manner. However, any steps to set fixed timelines in the implementation and build out of a consent, within a Section 106 Agreement or otherwise, would be counter-productive and add further complexity and uncertainty to the development process.

Therefore Policy GG4 should be amended to remove the introduction of build-out milestones.

User: Legal and General Capital

Strategic options

The IIA is not supported by a Green Belt Review. As result the reported conclusions on the relative value of the Green Belt are not justified. Without a comprehensive Green Belt Review (or the option for one through future Local Plans) the IIA adopts too narrow an approach to the opportunity for and benefits of limited Green Belt release in London. Proper consideration of limited Green Belt release as a reasonable alternative should be included in the IIA. Particularly where boundaries have not been reviewed for over 80 years and it is proposed to not meet FOAN for housing.

Policy GG2 (page 43)

IIA Option 4 for Policy GG2 considers “selective” Green Belt release, without defining what selective means or identifying proposed locations.

Even so the IIA states:

“This [Selective Green Belt Release] would bring a range of local economic benefits, helping to meet local demands and contribute to service and infrastructure provision. The release of land around commuter hubs could help to maximise and enhance strategic public transport infrastructure, underpinning sustainable growth. Green belt release in sustainable locations and areas of high PTAL could encourage inclusive growth, allowing access to the wide range of opportunities London has to offer. Increased public transport would contribute to improvements in air quality by reducing private vehicle use and associated emissions. Similarly, associated traffic noise would also decline and good design can help to ensure the number of people exposed to high levels of noise is in decline. This option also promotes the delivery of employment and housing land which will benefit businesses and residents alike, and could play a role in strengthening the long term competitiveness of London” (Page 49).

Despite the benefits identified above, Option 4 was discounted on environmental grounds. It was considered that the selective release of green belt land could have adverse impacts on species and habitats, and could set precedent for further green belt release, putting further natural capital at risk. The decision to discount Option 4 was made without reference to any specific sites, a Green Belt Review or Ecological Assessment.

The IIA goes on to state that the release of Green Belt land was also discounted on the basis that:

“This [Green Belt] land often supports a range of social activities, including community events, sports and leisure uses and other schemes that support health and wellbeing. Although the release of green belt will prioritise low performing areas, this may have some adverse impacts on local communities, heritage assets and associated leisure opportunities. Releasing greenbelt land could also have negative impacts on flooding as it would increase the amount of non-permeable, tarmac ground and reduce soils and trees to intercept water. Similarly, air quality would also be negatively impacted by reducing the amount of green space and trees available to act as a carbon sink for emissions” (Page 49).

In the absence of a Green Belt Review, the consideration of specific sites and other supporting evidence, it is not possible to arrive at the conclusions that all Green Belt release will have negative environmental impacts, result in the loss of social and leisure opportunities, have negative heritage impacts, result in increase in flooding and have adverse air quality impacts.

Policy GG4 (page 61)

The consideration for Policy GG4, delivering the homes Londoners need, does not consider the opportunity for and benefits of meeting affordable housing through limited Green Belt release. Including the potential to help to meet the London Plan strategic 50% affordable housing target.

User: Dagenham Dock Limited

Draft Policy GG4 – Delivering the homes Londoners need

DDL is supportive of the Mayor's drive to ensure that planning consents are granted and homes delivered promptly. However, DDL raise concern with regards to Draft Policy GG4e which seeks Local Planning Authorities to establish '*ambitious and achievable*' build-out rates at the planning stage in order to incentivise build-out milestones to help ensure that homes are built quickly and to reduce the likelihood of permission being sought to sell land on at a higher value. DDL object to the potential inclusion of further restrictive conditions (or pressure on the boroughs to adopt such policies) on future planning consents which seek to restrict timescales on delivery beyond the traditional implementation planning conditions applied to current planning consents in accordance with Section 92 of the Town and Country Planning Act to ensure the timely delivery of planning consents. Infrastructure commitments, market conditions, house builder capacity and labour supply can all affect the build out rate of strategic developments and this should not be for the planning authority to seek to restrict or penalise a perfectly implementable planning permission due to external factors. DDL's business plan is to develop a parcellated masterplan and facilitate multiple outlets on the site to maximise output and to avoid over reliance on a single builder.

User: Alzheimer's Society

1. The evidence base for Policy **GG4** contains a very well argued case for the type of housing London needs in the future. While policies around housing for older people and people with dementia is set out in H.15, we would like to see the commitment that suitable housing will be built for an aging London set out in policy GG4, especially as this will be a significant pressure on the housing market in the coming years[1]. Suitable housing for older people is covered in the Dementia Friendly Housing Charter, but should include options to downsize and housing that offers levels of support for a progressive disease like dementia.

[1] DCLG, CSIP, ILC, Sustainable planning for housing in an ageing population, 2008

User: Aitch Group

As stated above, we welcome the Mayor's ambition to deliver the 65,000 homes London needs a year. If the Mayor is serious about achieving this target it is critical that the policies within the London Plan takes a 'no-nonsense' approach to supporting that level of delivery.

A step change will be required from all the boroughs in their approach to delivery and supporting applications that optimise the use of brownfield land. We do not feel that the current draft provides the necessary policy basis for achieving this. Part A of the policy needs to be clarified to show how the Mayor will 'ensure that more homes are delviered'. It is not clear how the Mayor will do this and require boroughs to deliver their fair share of housing units.

In relation to Part B of the policy, my client supports the need for delivery of genuinely affordable homes, but has significant concerns that the 50% target is not achievable.

It is my clients experience from operating across the capital that this will be almost impossible to achieve on the open market, particularly in regeneration areas where residential land values are challenging. If the Mayor is serious about delivering housing numbers then it is critical that he does not try and impose unrealistic affordable housing targets that will become a barrier to housing delivery. We would strongly suggest that the Mayor does not set himself up to fail and relook at the wording of this policy so that it still provides the requirement to provide maximum reasonable levels of affordable housing, but whilst still enabling delivery.

User:	Bexley Natural Environment Forum
1.4.3 – BNEF supports the proposal for affordable housing, but again how does the Mayor plan to ensure that these are provided for under the Plan.	

User: Highgate Society

Support and Object

The principle of this is agreed and welcomed.

However, there is little to ensure that permission for residential use will be built for sale or rent on the open market at prices Londoners can afford. Too many luxury flats have been developed which remain empty and do not address the housing crisis in London.

GG4 (B) Strongly Object

The strategic target of 50% affordable housing is unrealistic without measures to ensure that this can be delivered. Currently there is a reliance on developers to deliver housing. Discussions the Society has had with those involved in the provision of housing have suggested that anything higher than 25% is not viable for developers and that they will simply not build. Affordable housing needs to be built by dedicated provider such as Councils, and properly funded.

GG4 (E) Support and comment

Too often, sites gain planning with high quality design which are then “value engineered” at construction stage to considerably reduce the design quality. Measures should be taken to ensure quality design obtained at planning is carried through to completion

User:	Hoare Lea LLP`

Definition of a “High Quality Home” would be welcomed. With the removal of the Code for Sustainable Homes (CfSH) perhaps developments could be encouraged to consider the Home Quality Mark (HQM) to measure and report against the requirement for “High Quality Homes”.

User:	Natural England

Natural England recognises the need to significantly increase the delivery of homes in London. Achieving the target of 65,000 new homes per year across London, whilst at the same time increasing overall green cover to over 50%, increasing access to nature and greenspace, enhancing ecosystem service provision, and providing a net gain in biodiversity constitutes a significant challenge. We believe that the recommendations we provide for policy within Chapters 2, 4 and 8 in particular are integral to ensuring that these and other environmental targets are not compromised by meeting anticipated housing demand. We note the new emphasis on the use of small sites for housing provision, and would like to highlight that adequate consideration should be given to the environmental impacts of development of these sites, which may cumulatively have a very significant effect on ecosystem service provision, including biodiversity and access to nature. Please refer to our comments on Policy H2 for our recommendations on this matter.

User:	London Chamber of Commerce and Industry

Policy GG4 Delivering the homes Londoners need

“The Draft London Plan targets are not targets, they are totally unrealistic. They are based on an unproven theory of intensification rather than past trends. There is no evidence to show that the suburbs will intensify at the rate the Mayor thinks. There is neither the developer profit motive nor the development capacity. No thought appears to have been given to the transport infrastructure, local jobs, schools, health services and parkland required to cater for the sudden uplift in new residents.”

Planner, London Borough of Sutton

18. London’s population is rising fast, with projected annual population growth now 79,000, versus previous estimates of 63,000 per year6. The London Plan rightly states that “London must seek to deliver new homes through every available means”7. However, the Mayor’s support for “continued protection of London’s Green Belt”8, we believe, runs contrary to that previous assertion. Most London firms - impacted by the housing crisis via difficultly recruiting and retaining new staff - support reclassification of some Green Belt to enable new housing development9.

19. Given the capital’s finite amount of space, and housing delivery rates to date, it is hard to envisage how the new target of 66,000 new homes per year is going to be achieved, not least given the feedback we have received including from Local Authority planning officers about the limits of intensification and availability of land. This is why LCCI advocates an honest review of the capital’s Green Belt.

20. In addition, the London Plan has identified the role that small sites10, and by default, small builders, can play in helping deliver approximately 25,000 homes per year11.

21. Small sites have, however, traditionally been hard to develop by smaller builders in the capital. Our position on small sites, small builders is detailed under the ‘housing’ section (H1) of this response.

22. LCCI recognises that there must be mix of housing stock to cater for the varying needs of all Londoners, including both homes to rent and to buy. An LCCI survey of London businesses reflects the growing importance of affordable homes to rent for Londoners12, which were viewed as equally as important to an improved supply of affordable homes to own.

User:	Chairs of Camden's Conservation Area Advisory Committees

GG4 – C Draft policy: ‘Create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing.’

Our proposed amendments – **reasoning**: we welcome the creation – and continuation – of inclusive communities, and of high standards of design. Both require an understanding of the distinctive sense of place in each location. Our proposed revised text would help ensure the success of this policy, and achieve consistency with rest of the Plan, and with the Plan’s stated heritage objectives.

Our proposed revised text: ‘Create mixed and inclusive communities, with good quality homes that meet high standards of design, ~~and~~ provide for identified needs, including for specialist housing, and respect local distinct and varied character, preserving and enhancing heritage assets.’

User: CIBSE

Quality should be given as much importance as quantity:
• Post-occupancy evaluation should be encouraged to assess resident satisfaction and identify whether needs are met; on major developments it could be mandated for at least a proportion of the dwellings, and wherever possible should be a condition of permissions for affordable developments.

• Energy monitoring should also be carried out, to identify issues of under-performance and high running costs (with possible fuel poverty implications) – see more details in our response to policy SI2. This should be established in such a way that the monitoring is undertaken and data reported within the constraints of legitimate confidentiality and data protection provisions, as this will help to deliver the data needed to improve energy management and to inform policy makers on current typical levels of operational energy use.

User:	Grafton Group Plc

We strongly support the policy clarification of the importance of ensuring that more homes are delivered for Londoners. This is the key objective for the London Plan.

User:	Thames Valley Housing Association

Policy GG4 ‘Delivering the homes Londoners need’ is also supported by TVHA, paragraph 1.4.5 is important, which states ‘To meet the growing need, London must seek to deliver new homes through every available means. Reusing large brownfield sites will remain crucial, although vacant plots are now scarce….’ TVHA consider that key to helping achieve this is delivery, providing mixed communities and incentivising build-out rates.

User: Mr Gary Hayes

GG4 Delivering the homes that Londoners need

(A) Delivering more homes without specification of types or tenure of homes, does not, in practice deliver the homes that are actually needed.

(B) We assess that only a very small percentage of homes that the Mayor deems to be ‘genuinely affordable’ will be affordable to households that have below median income levels.

(C) There is a real danger, particularly in Opportunity Areas and other large-scale developments, that new communities are being created comprising households mostly with above the median income levels living in one and two-bedroom homes – that is neither mixed or balanced communities.

User:	Landsec

- It should clearly state in Policies GG4 and GG5, in respect of housing and commercial development respectively, that the plan’s objective is to encourage and enable the development and growth that London needs, not to restrain it.

User: Redrow Homes London Division.

We agree that the Mayor should be responsible for carrying out the objective assessment of need (OAN) for London as a whole, rather than the 35 LPAs.

However, the GLA should calculate its housing need using the ‘standardised methodology’ set out in the DCLG’s Planning for the Right Homes in the Right Places consultation, to be consistent with rest of the country.

The Draft Plan should be amended so the housing need is calculated using the government’s standardised methodology for calculating the objectively assessment of housing need.

User:	Redrow Homes London Division.

In view of the recognised housing crisis in London, this policy should make it clear that there is a presumption in favour of delivering all newly proposed residential homes, including small sites and unallocated brownfield land.

Amend policy to include an additional sub-section referencing that there is a presumption in favour of delivering residential development.

User: Sean Creighton

Policy GG4 Delivering the homes Londoners need

23. This is not achievable unless:

(1) there is an end to the link between ‘affordable’ rents and private rents;

(2) rent controls are introduced to ensure ‘genuine’ affordability;

(3) minimum space standards are increased;

(4) homes are for rent or purchase not for profit and investment;

(5) the activities of buy-to-let landlords are controlled;

(6) the penalties for providing poor and overcrowded homes by private landlords are made much tougher through every Borough having a landlord licence scheme, as does Croydon.

Policy GG4 E. Establish ambitious and achievable build-out rates at the planning stage, incentivising build-out milestones to help ensure that homes are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value.

24. This Is imperative if developers are not to land bank or sell-on with planning permissions to make a profit without the housing being built.

User: Andrea Carey Fuller

Delivering more homes without specification of types or tenure of homes, does not, in practice deliver the homes that are actually needed.

We assess that only a very small percentage of homes that the Mayor deems to be ‘genuinely affordable’ will be affordable to households that have below median income levels.

There is a real danger, particularly in Opportunity Areas and other large-scale developments, that new communities are being created comprising households mostly with above the median income levels living in one and two-bedroom homes – that is neither mixed or balanced communities.

User: Lendlease

We fully support the Mayor's ambition for significant housing growth set out in the draft Plan; however, we have some concerns over the methodology used to arrive at the objectively assessed need (OAN), in line with Government guidance. The Government has recently consulted on proposals for a new standard methodology (Planning for the Right Homes in the Right Places) setting out an update on how objectively assessed need should be assessed, which is set to be implemented once the revised NPPF is published. There is a need for a consistent approach across authorities, including the GLA in assessing housing need, particularly so, given that London's housing market is closely related to that of the wider southeast.

The National Planning Practice Guidance (NPPG) (ID: 2a-015) states that the MHCLG household projections should form the demographic starting point. In this policy context and particularly given London's relationship to the wider southeast it is not considered that this deviation from policy guidance is appropriate. The figure used in the 2017 SHMA arrives at a demographic starting point of 48,200 households per annum, substantially lower than the 54,000 using the 2014 SNPP projections. As a minimum the London Plan should use the SNPP figures as the starting point, but the implications of the standard methodology should also be considered as it is likely to be implemented before the draft Plan is submitted. If this is the case the standard methodology OAN should be used.

On this basis, London's objectively assessed housing need is likely to be substantially higher than the 66,000 figure in the 2017 SHMA. The NPPF objective is that Plans should meet the OAN in full and it is essential that the OAN which informs the housing requirement is robust. Paragraph 1.4.3 (Delivering the homes Londoners need) is therefore unsound as it is inconsistent with national policy.

User:	Oneill Homer

GG4 Local communities are adept at using neighbourhood plans to provide an effective means of identifying, evaluating and allocating small sites and in setting out the key land use and development principles to encourage quality proposals.

User: South East England Councils

iv) The Plan refers to London’s housing delivery not keeping pace with planning approvals, highlighting an unbuilt pipeline of 274,000 homes, which could hinder delivery of the Mayor’s growth aims. The Plan also aims for 50% of all new homes to be ‘truly affordable’ (Policy GG4 & H5). Delivery of approved market and affordable homes and supporting infrastructure is a shared challenge in the South East, holding back local growth plans.

? SEEC welcomes ongoing joint working with the Mayor to press Government for changes that would help address our shared challenges of unimplemented planning permissions and barriers to housing delivery. We would like to see the Plan specify the Mayor’s commitment to working in partnership with SEEC to help London and its neighbours overcome particular barriers to delivering market and affordable homes, such as: local discretionary powers to incentivise delivery (eg. charging council tax on unimplemented permissions); funding powers/freedoms for us to deliver more affordable homes (eg. lifting the HRA cap for all councils) and supporting infrastructure (eg. local retention of stamp duty).

User: L&Q

We agree that the Mayor should be responsible for carrying out the objective assessment of need (OAN) for London as a whole, rather than the 35 LPAs. However, the GLA should calculate its housing need using the ‘standardised methodology’ set out in the DCLG’s Planning for the Right Homes in the Right Places consultation, to be consistent with rest of the country.

The Draft Plan should be amended so the housing need is calculated using the government’s standardised methodology for calculating the objectively assessment of housing need.

User: London Borough of Camden

The Council supports the ambitions of Policy GG4 and the strategic target for 50 per cent of all new homes to be genuinely affordable.

In particular, the Council supports the statement in paragraph 1.4.4 that: "*Ten-year housing targets have been established for every borough, alongside Opportunity Area plans for longer-term delivery where the potential for new homes is especially high. Boroughs can rely on these targets when developing their Development Plan documents and are not required to take account of nationally-derived local-level need figures* ."

The Council agrees that the London Plan should aim to meet the level of housing need identified by the London Strategic Housing Market Assessment (SHMA), and that the borough level targets derived from the London Strategic Housing Land Availability Assessment (SHLAA) should be a key building block for housing targets in borough local plans. The Council considers that this strategy is appropriate to avoid the wasteful duplication that arises where each borough must identify housing need at a more local level, and negotiate with all nearby boroughs to agree how that need should be met.

User: L&Q

Presumption in favour of all residential development

In view of the recognised housing crisis in London, this policy should make it clear that there is a presumption in favour of delivering all newly proposed residential homes, including small sites and unallocated brownfield land.

Amend policy to include an additional sub-section referencing that there is a presumption in favour of delivering residential development.

User: National Custom and Self Build Association

Policy GG4 Delivering the homes Londoners need C)

To create a housing market that works better for all Londoners, those involved in planning and development must:

C) Create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing.

NaCSBA proposes that Policy GG4 C) be amended to align it with the NPPF by giving some definition of specialist housing:

e.g. including the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes).

This could be extended further to specifically include community led housing projects and co-housing.

Policy GG4 Delivering the homes Londoners need D)

Policy GG4 Delivering the homes Londoners need

To create a housing market that works better for all Londoners, those involved in planning and development must:

D) Establish ambitious and achievable build-out rates at the planning stage, incentivising build-out milestones to help ensure that homes are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value.

NaCSBA is concerned that incentives to encourage build out rates in Policy GG4 D) do not unintentionally penalise developers (enabling developers) creating serviced plots (including conversion opportunities within existing buildings) for custom and self build homes.

The role of an enabling developer is to introduce infrastructure to create opportunities for individuals or groups of individuals to build their own home. The developer may be a private sector entity, a local authority, a public private sector partnership or a community led entity such as a community land trust. They will obtain consent on larger sites and then sell parts to individuals or groups to build out. This can include full design and build, self finish, or self build.

Off-site construction means that custom and self build can be extremely rapid, but the timescale can only be partially controlled by the enabling developer.

User: Socialist Health Association London

To create a housing market that works better for all Londoners, those involved in planning and development must:

1. ensure that more homes are delivered.
2. support the delivery of the strategic target of 50 per cent of all new homes being genuinely affordable.
3. create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing.
4. identify and allocate a range of sites, including small sites, to deliver housing locally, supporting skilled precision-manufacturing that can increase the rate of building, and planning for all necessary supporting infrastructure from the outset.
5. establish ambitious and achievable build-out rates at the planning stage, incentivising build-out milestones to help ensure that homes are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value

Decent Housing in place of poor housing

>>> Contracts should not be agreed with developers such as Capco which have a track record in poor practice or the route taken under the controversial Haringey HDV project.

The Earls Court and West Kensington Opportunity Area Risk Assessment commissioned by the Save Earl's Court Campaign highlighted the then probable and now actual risks of this project going ahead. It is an abject lesson in the failings of latterday so-called regeneration which has sold out whole communities to foreign investors. Regeneration needs to go back to its original roots of community engagement and community improvement - not detriment for profit.

We also know that the Earl's Court project has just about ground to a halt because of the glut of similar high end property and the economic uncertainties of Brexit. Whilst the latter was inconceivable in 2013, the former most definitely was not. The local community and London have suffered a significant loss to absolutely no good purpose.

http://www.saveearlscourt.com/uploads/1/5/8/1/15819512/earls-court-opportunity-area-risk-assessment-copy-pdf-1.pdf

>>> It is possible to identify green developers who follow a community friendly regeneration programme with a sustainability agenda who work effectively with local communities, rather than purely driven by a profit motive no matter what the long term negative impact. This should be the baseline of all new developments.

For example with respect to Earl's Court, there is now the opportunity to rescue the situation in part by turning the whole project into a green development – although it will never replace generate the kind of revenue (£1.5bn pa) the lost halls once did, it could instead become a landmark project for real community regeneration and supporting healthy lives.

Please also refer to our section on AIR QUALITY – see Page 27

Policy GG4 Delivering the homes Londoners need

GG4

To create a housing market that works better for all Londoners, those involved in planning and development must:

1. ensure that more homes are delivered.
2. support the delivery of the strategic target of 50 per cent of all new homes being genuinely affordable.
3. create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing.
4. identify and allocate a range of sites, including small sites, to deliver housing locally, supporting skilled precision-manufacturing that can increase the rate of building, and planning for all necessary supporting infrastructure from the outset.
5. establish ambitious and achievable build-out rates at the planning stage, incentivising build-out milestones to help ensure that homes are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value

HOUSING IS A HEALTH ISSUE

We know from the work we have done with the Town and Country Planning Assoc on previous projects that it is possible to plan in a healthy way – we recommend their work described in several reports such as **Planning Out Poverty and Planning for Green, Built Today, Treasured Tomorrow, Nothing Gained by Overcrowding – as well as their Planning for Affordable Housing currently in process.** https://www.tcpa.org.uk

The Grenfell tragedy has put the spotlight on not only the lack of safe homes in the capital but also on the huge inequality and imbalance in housing development and access to decent homes.

We draw your attention to the report **After Grenfell by Emma Dent Coad – housing and inequality in Kensington and Chelsea : 'the most unequal borough in Britain'.**

We also refer to the recent success of Karen Buck MP in gaining cross party support for her PMB on landlord responsibility with respect to decent homes.

Health is the common denominator and in one ward, life expectancy had dropped 6 years since 2010 while a man living in the ward containing Harrods has an increased life expectancy. For a Moroccan man in a poor part of K&C, LE is now a mere 55, while for an affluent British man it is towards 90.

Cuts in public health budgets are also to blame – and the reversal of funding models which reward longevity rather than compensate poverty.

The market should never be the driver in any of this.

The Grenfell tragedy is the flip side of the land grab projects such as the Heygate and Earl's Court where local people have been robbed of their homes and livelihoods to build high end housing with the results which were just as we predicted from the outset.

Moreover, since the devastating demolition of Earls Ct, which had previously generated £1.5 bn pa to the London economy, not only have residents had to deal with extreme dust nuisance and many small traders have lost their livelihood, but following the first tranche of flats being sold solely to offshore purchasers, the market has changed such that Capco has now ceased building and the whole project is up for review. The campaign is now asking for a fully green development to take on the wasteland that is now the Earl's Court site.

http://www.saveearlscourt.com/uploads/1/5/8/1/15819512/earls-court-opportunity-area-risk-assessment-copy-pdf-1.pdf

We know that not one single part of the new Heygate accommodation has been taken by previous residents, but every unit sold to overseas and often absent owners. This is not a mixed or inclusive development and we hope that the new approach will avoid a repeat of such a housing travesty in the future.

Meanwhile too many workers and families live in appalling conditions for which the state often pays landlords an extortionate rent. Others are a step away from homelessness – sleeping on sofas and floors. Too many families now have to rely on foodbanks – often because so much of their weekly budget is spent on housing which is in turn often substandard, which in turn detrimentally affects their health – both physical and mental. This is a vicious cycle which we need to break.

The Health of the Homeless

It is well known that the health and life expectancy of the homeless is extremely poor – with an average life expectancy of 30 years below average – due to the obvious effects of rough sleeping and added lack of access to medical help/GP registration etc

Homelessness is horribly on the increase – 134% increase nationally since 2010

It is well known that London is a Homeless Hotspot. 32 areas cited with the largest homeless population are in London. The worst affected is Newham where 1 in 25 residents are classed as homeless – and that, like all homelessness data, does not include the hidden homeless.

London's ten worst areas for homelessness

1. Newham; London; 13,607

2. Haringey; London; 9,717

3. Westminster; London; 8,054

4. Enfield; London; 10,057

5. Kensington and Chelsea; London; 4,401

6. Waltham Forest; London; 7,634

7. Brent; London; 8,905

8. Barking and Dagenham; London; 5,578

9. Tower Hamlets; London; 7,428

10. Hackney; London; 6,167

Whilst we applaud the increase in bad weather shelters, but for longevity, we recommend increasing support for innovative homeless housing projects which are already being adopted by some local authorities such as Lewisham.

We also recommend resurrecting the Foyer model where residents are offered training and education on the same site as their accommodation.

We applaud those councils who have begun to once again build social housing and urge others to follow suit.

User: dp9

Policy GG4 – Delivering the Homes Londoners Needs

There is an inherent tension between elements A and B of this policy. Delivering more homes overall requires a measured approach to affordable housing, ensuring that viability and delivery factors for each site, and in particular for larger, more complex regeneration projects, are taken into account.

Whilst providing as much affordable housing as possible is of unquestionable importance, requiring a level of affordable housing that goes beyond that which a development can viably provide has the potential to impact on the delivery of all homes. An unviable scheme will not proceed. We do not consider that this would be beneficial for London, and therefore encourage a measured approach to affordable housing requirements.

Part E of this policy seeks to establish ambitious and achievable build-out rates at the planning stage, incentivizing build-out milestones. We do not agree with introducing stipulations on build out rates through the planning system, as they add yet another matter for negotiation and more requirements for development schemes to meet. It is unlikely that build-out rates can be set with confidence by a developer at the planning stage, when a scheme is not sufficiently progressed to enable realistic predictions. Notwithstanding our objection, if build out rates are to be set through the planning process, we would encourage further clarity on what incentives may be provided, but would strongly discourage any suggestion of penalties if build-out milestones forced upon a developer at the planning stage are not subsequently achieved. Setting build out rates will not succeed unless the procedural hurdles to delivery are also reduced – this includes the burden of information and documentation imposed by the planning system, and in this regard the Draft London Plan promises to impose more burden than the current Plan which could impact negatively on delivery.

We would, however, note that Battersea Power Station is an example of what is required in order to maintain a fast pace of delivery despite economic and other challenges. Developments must be allowed to respond to conditions and adapt their build out rates to suit a variety of factors. Ambitious build-out rates may be difficult to achieve and will have implications that the planning system will need to address.

RECOMMENDATION: Either remove the requirement to establish ambitious and achievable build out rates or clarify how their achievement is to be incentivized.

User: Taylor Wimpey UK

Para 1.4.3 & Para 1.4.4

The 2017 london SHMA has identified a need for 66,000 new homes each year, for at least 20 years.

Para 1.4.4 states that in partnership with boroughs, the Mayor has undertaken a Strategic Housing Land Availability Assessment to identify where the homes London needs can be delivered. Boroughs can rely on these targets when developing their Development Plan documents and are not required to take account of nationally-derived local-level need figures.

In September 2017, the Gove rnment published its Consultation Proposals "Planning for the Right Homes in the Right Places". This introduced a standardised approach to assessing Housing Need in England.

Notably, the standard methodology indicates a base requirement for London of 72,407 dpa without applying any adjustments to account for economic growth and employment projections. Whilst the figure does include an adjustment to take account of affordability (market signals), this number is capped.

Our representations to DCLG argued that applying an artificial cap to a base line OAN, would supress the housing need figure and undermine the Government and industry's objectives to address the current housing crisis. NPPG states that OAN must be based on facts and unbiased evidence and that Plan makers should not apply constraints to the overall assessment of need. These will be addressed when bringing evidence together to identify specific policies within development plans.

Removal of the cap would result in an annual requirement for London of 95,267 dpa.

Paragraph 44 of DCLG's consultation recommends that the standardised methodology approach should apply to elected Mayors with plan-making powers, although there may be compelling circumstances not to adopt the proposed approach that must be properly justified and subject to examination.

Paragraph 47 of DCLGs consultation states:" There should be very limited grounds for adopting an alternative method which results in a lower need than our proposed approach. The reasons for doing so will be tested rigorously by the Planning Inspector through examination of the plan. We would expect: the Inspector to take the number from our preferred method as a reference point in considering the alternative method; and the plan-making body to make sure that the evidence base is robust and based on realistic assumptions, and that they have clearly set out how they have demonstrated joint working" (DCLG Sept 2017)

We believe the proposed 66,000 falls significantly below London's housing needs and that the starting position should reflect the uncapped figure of 95,267 from the Government 's Standard Methodology approach.

Compelling evidence has not been put forward to justify why London is not required to take account of the Government's Standard Methodology.

As set out in NPPG, constraints to delivering the OAN will be addressed when bringing evidence together to identify specific policies wit hin development plans. This will include a requirement to demonstrate joint working.

Given the London Plan is effectively setting the housing targets for the London Boroughs, evidence should be prepared to demonstrate co-operation with adjoining Planning Authorities in line with Paragraph 178 of NPPF (2012). This is particularly relevant given the proposed OAN falls below that set out in DCLGs standard methodology that could result in adjoining planning authority's having to plan for their own needs and a share of London's unmet need.

Para 1.4.4 of the draft plan states that in partnership with boroughs, the Mayor has undertaken a Strategic Housing Land Availability Assessment to identify whe re the homes London needs can be delivered.

Notwithstanding our concern that the proposed housing need figure falls below London's requirement, we are unconvinced that the London Plan will facilitate the delivery of 66,000 homes per year. This is due to the following factors:

SHLAA Evidence.

Plans should identify key sites that are critical to the delivery of the housing strategy over the plan period, together with a 5 yr supply (plus buffer) of specific deliverable sites. These sites should be subject to independent assessment to ensure they are viable and capable of delivery within the point envisaged.

The SHLAA evidence indicates that London has capacity for 649,350 homes during the 10 yr period covered by the London Plan from Large Sites, Small Sites (below 0.25 Ha) and a contribution from non- self-contained accommodation.

However, this relies heavily on assumptions concerning capacity, densities and delivery time frames from unidentified sites over the next 10 years.

Wh ilst the SHLAA is not a site allocations document, it has informed the proposed distribution of housing numbers based upon the capacity of London Boroughs to accommodate such growth over the first 10 years of the Plan. It is therefore correct that the SHLAA should be robust.

We have the following concerns:

Large Sites 40,000/year (62% of total)

Planning Approvals 14,000/yr

- consideration should be given to lapse rates and re-plans;
- the assessment should differentiate between outline planning permissions and detailed permissions and whether or not reserved matters have been approved. This will directly impact on delivery time frames;
- assumptions on build-out-rates should be tested against market evidence.

Allocations 15,500/yr

- consideration to be given to their net developable area, and
- whether they remain deliverable or developable under NPPF Footnotes 11 and 12.

Potential Development Sites 10,000/yr

- assumptions over net developable areas and densities to be independently tested; and

- whether they are deliverable or developable under NPPF Footnotes 11and 12.
- These sites sho uld be subject to testing at the Local Plan Examination for robustness;

Low Probability Sites

- These should be discounted from the assessment .

Small Sites. 24,500/year (38% of total)

Whilst the TWUK is supportive of opportunities to increase the role of SMEs to help deliver London's housing need;

- There is an overreliance in contributions from small sites towa rds the overall capacity assessment;
- Modelled small sites account for 28.7% of London's overall Housing supply - these are essentially windfall sites and it is misleading to disaggregate them from the windfall contribution.
- Para 48 of NPPF states that LPAs can make an allowance for windfall sites in the five-year supply if they have a compelling case. Any allowance should not include residential gardens. The SHLAA projects windfall and small site contributions over 10 years rather than 5.
- There is no evidence or compelling case to support the level of contributions from unidentified small sites.
- Density assumptions disregard key development criteria including, market demand, site suitability and viability.

Draft Policies

The plan contains a number of Polices that are overly prescriptive, place unreasonable burdens on both developers and Local Planning Authorities to be able to plan to meet their housing needs, and cumulatively are likely to have a detrimental impact on the viability of housing schemes that will prejudice sites coming forward for development or the delivery of policy compliant schemes.

Track Record

In 2014/15, net housing completions were 31,894 units (London Plan AMR 2014/15). This figure matched the minimum targets expressed in the London Plan 2011. In 2015/16 net completions were circa 38,500, some 10,500 below the full OAN.

The revised requirement set out in the draft plan of 66,000 homes per year, represents an increase of 24,000 homes/year above the previous minimum requirement (42,000 homes/yr) .

In terms of delivery, London will have to increase on its 2015/16 delivery by some 71% to achieve the *revised* minimum level of housing need each year. We have concerns that this is not deliverable unless Local Planning Authority's identify a substantial buffer to their 5 year housing land supply to ensure choice and competition in the market for land. To maintain such a supply we believe that Local Authorities will have to co-operate with adjoining non-London planning authorities.

We also anticipate a time lag between adoption of the London Plan, allocation of additional sites through Local Plans to reflect the revised need figures and delivery of units on these sites. Whilst there is a current pipeline of existing sites and consents, these do not cater for the increased need figures.

This suggests there will be an annual shortfall to be made up in the early years of the plan, putting greater pressure on the London Boroughs to find sufficient housing sites.

It may be possible to address some of these issues *via* the following actions:

- Detailed Review of La rge SHLAA sites as part of London Plan Prepa ration and EIP to provide greater comfort that they will come forward within the 10 yr period against NPPF footnote 11 and 12.
- Reducing the assumed level of contribution from small sites and Windfall to a more realistic level that is evidence based;
- Co-operation with adjoining Authorities to identify additional opportunities, potential reserve sites, and safeguarded land.
- Amendments to Policy wording to provide greater flexibility for LPAs to deliver housing - this is addressed later in our representations.

Policy GG4 Delivering the homes Londoners need.

The Policy requires that those involved in planning and development must:

- support the delivery of the strategic target of 50 per cent of all new homes being genuinely affordable; and
- establish ambitious and achievable build-out rates at the planning stage, incentivising build- out milestones to help ensure that homes are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value.

We believe this Policy to be overly prescriptive and inflexible.

Affordable housing requirements should be based on objectively assessed needs in the housing market area. Para 173 of NPPF also states that: *"To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable." Para 177 also states that any affordable housing or local standards requirements that may be applied to development should be assessed at the plan making stage, where possible and kept under review.*

Whilst we support the principle of encouraging ambitious and achievable build out rates, clarification is required on how the Mayor intends to incentivise developers to ensure this will not have the opposite effect.

The policy as currently worded is not supported.

User:	S Horne
Pol GG4 66,000 homes per year for 20 years. No to 270,000 homes would cover all Home Counties. 270,000 more cars? No.	

User: Aberfeldy New Village LLP

Targets for Growth

We broadly welcome the targets for growth set out in the draft Plan.

However, we have concerns over the methodology used to arrive at the objectively assessed need. The Government has set out guidance on how objectively assessed need should be assessed and has recently consulted on proposals for a new standard methodology (*Planning for the Right Homes in the Right Places), which is set to be implemented once the revised NPPF is published. There is a need for a consistent approach across authorities in assessing housing need and this is particularly so given that London's housing market is closely related to that of the wider southeast.*

Failure to ensure consistency results in households being missed and leads to affordability pressures. The median house price to median earnings ratio across London is 15.4, with some boroughs significantly exceeding this and overcrowding has increasingly become commonplace in London and is evidenced by the increasing average household size.

The National Planning Practice Guidance (NPPG) (ID: 2a-015) states that the DCLG household projections should form the demographic starting point. In this policy context and particularly given London's relationship to the wider southeast it is not considered that this deviation from policy guidance is appropriate. The figure used in the 2017 SHMA arrives at a demographic starting point of 48,200 households per annum, substantially lower than the 54,000 using the 2014 SNPP projections. As a minimum the London Plan should use the SNPP figures as the starting point, but the implications of the standard methodology should also be considered as it is likely to be implemented before the draft Plan is submitted. If this is the case the standard methodology OAN should be used.

On this basis, London's objectively assessed housing need is likely to be substantially higher than the 66,000 figure in the 2017 SHMA. The NPPF objective is that Plans should meet the OAN in full and it is essential that the OAN which informs the housing requirement is robust.

Paragraph 1.4.3 (Delivering the homes Londoners need) is therefore unsound as it is inconsistent with national policy.

User:	CN, WD, GE, LIH and CH consortium

Good Growth Policy GG4 – ‘Delivering the homes Londoners need’ the Plan states how those involved in planning and development must do the following:

1. • Ensure that more homes are delivered;
2. • Support a target of 50% genuinely affordable housing provision;
3. • Establish ambitious and achievable build-out rates at the planning stage, to ensure homes are built quickly. 9 (Our emphasis)

User:	London and Continental Railways

We also note that draft Policy GG4 states that those involved in planning and development must identify and allocate a range of sites to deliver housing locally, establishing ambitious and achievable build-out rates at the planning stage. This is relevant to representations made to the LLDC as part of its Local Plan Review, as these promote LCR’s Zone 5 site (in addition to neighbouring adjoining sites) to be allocated for residential-led mixed use redevelopment.

User: Unknown

HOUSING

4. Paragraph 47 of the NPPF states that “local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.”

5. Paragraph 1.4.3 of the DLP confirms that the 2017 London Strategic Housing Market Assessment has identified a need for 66,000 new homes per year for 20 years. This is a significant overall uplift on the adopted London Plan which, through the London Strategic Housing Market Assessment of 2013, identified a need for 49,000 new homes per year. Paragraph 1.4.4 of the DLP states that the London Plan considers London to have a single housing market. It furthermore suggests that “Boroughs can rely on the housing targets [set out for each Borough] when developing their Development Plan documents and are not required to take account of nationally-derived local-level need figures.”

User: Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living

GG4 (19) Delivering the Homes Londoners Need

We support the increased provision of older people's housing from the current supply of 100-200 pa to in excess of 4,000 pa.

Retirement housing providers do not land bank and typically build out planning permissions immediately once achieved due to the nature of the specialist housing and difficulty in securing appropriate and suitable sites for development.

It is important that the provision of specialist housing for older people is fully understood in terms of risk and that this is not held up through policy burdens which do not allow viable retirement developments to come forward. We believe that the level of planning contributions sought from specialist housing, which are increased as a result of the nonsaleable communal areas, is impeding the delivery of homes. We have recommended to Government that it creates a sub-category of the C2 planning classification (which currently applies to residential care and nursing homes) for specialist housing which would reduce the contributions required from developers. The creation of a new use class for specialist housing which would have the same effect as recommended in the recent CLG Committee Report[1]

The quantum of provision needs to be split by type and tenure. The current London Plan Annex 5 approach should be duly retained and repeated in this section or as a revised annex. The removal of tenure from Annex 5 is ill-advised and unhelpful in identifying and addressing needs.

We support this policy in principle and subject to the changes we propose.

[1] CLG Committee's report on Housing for Older People

User: Battersea Project Land Company Limited

Policy GG4 – Delivering the Homes Londoners Needs

There is an inherent tension between elements A and B of this policy. Delivering more homes overall requires a measured approach to affordable housing, ensuring that viability and delivery factors for each site, and in particular for larger, more complex regeneration projects, are taken into account.

Whilst providing as much affordable housing as possible is of unquestionable importance, requiring a level of affordable housing that goes beyond that which a development can viably provide has the potential to impact on the delivery of all homes. An unviable scheme will not proceed. We do not consider that this would be beneficial for London, and therefore encourage a measured approach to affordable housing requirements.

Part E of this policy seeks to establish ambitious and achievable build-out rates at the planning stage, incentivizing build-out milestones. We do not agree with introducing stipulations on build out rates through the planning system, as they add yet another matter for negotiation and more requirements for development schemes to meet. It is unlikely that build-out rates can be set with confidence by a developer at the planning stage, when a scheme is not sufficiently progressed to enable realistic predictions. Notwithstanding our objection, if build out rates are to be set through the planning process, we would encourage further clarity on what incentives may be provided, but would strongly discourage any suggestion of penalties if build-out milestones forced upon a developer at the planning stage are not subsequently achieved. Setting build out rates will not succeed unless the procedural hurdles to delivery are also reduced – this includes the burden of information and documentation
imposed by the planning system, and in this regard the Draft London Plan promises to impose more burden than the current Plan which could impact negatively on delivery.

We would, however, note that Battersea Power Station is an example of what is required in order to maintain a fast pace of delivery despite economic and other challenges. Developments must be allowed to respond to conditions and adapt their build out rates to suit a variety of factors. Ambitious build-out rates may be difficult to achieve and will have implications that the planning system will need to address.

RECOMMENDATION: Either remove the requirement to establish ambitious and achievable build out rates or clarify how their achievement is to be incentivized.

User:	Age UK London - a charity working with older Londoners

POLICY GG4 DELIVERING THE HOMES LONDONERS NEED

A Ensure that more NEW AND CONVERTED homes are delivered, WHICH SHOULD BE AGE AND DISABILITY FRIENDLY.

C Create mixed, and inclusive AND ACCESSIBLE communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing.

ADD CRITERION:F. ENGAGE WITH LOCAL PEOPLE AND PROSPECTIVE END USERS AT ALL PLANNING AND DESIGN STAGES, TO ENSURE THAT HOUSING DESIGNS ARE RESPONSIVE TO NEEDS AND INSPIRATIONAL IN TERMS OF DESIGN AND FUTURE USE.

User: Ashden (a charity)

Homes will have to be built to high sustainability standards if London is to meet its zero carbon ambition. Homes will need to be affordable to buy and to warm, and should not continue to push up London's carbon emissions. Managing the additional emissions that they create will be best achieved by designing in sustainability from the start, in a way which guarantees performance when in use.

Therefore, it is essential that sustainability is reflected in both the focus on homes in the London Plan and the section on design. The high level text that sets out Policy GG4 on p.19 should include reference to high sustainability standards. For example, it should state that new homes should support London's transition to zero carbon by 2050.

User:	Abigail Woodman

Once, and only once, all empty properties in London are lived in should we consider a rush to build new homes. The housing crisis is centred on who owns our housing stock and how those homes are made available for people to live in, and not necessarily on a shortage of properties.

User: Regeneration X

1.4.3 *2017 SHMA identified a significant overall need for housing and for affordable housing particularly. London needs 66,000 new homes per year for 20 years and evidence suggests that 43,000 of these should be genuinely affordable. This supports Mayors strategic target of 50% of new homes being genuinely affordable.*

66,000 per year with 43,000 being affordable = an actual need for 65% affordable, so the Mayors target of 50% (which seems to be later watered down to 35% in some places) doesn't match or meet his strategy. There needs to be a return to social housing at social rents (for general needs, at secure tenancies) if we are to solve the housing crisis.

User:	Regeneration X

1.44 *The London Plan is able to look across the city to plan for the housing needs of all Londoners, treating London as a single housing market*. What! London is not a single housing market! Not even for international investors – they are not ambivalent over which part of London they invest in; they invest in a limited number of locations. Most Londoners are not 'free' to live in any part of London. Most people in South London do not look to locate in North London. Most people moving to London from outside of London tend to locate in central London (Zones 1 and 2) and not the outer London Suburbs. This is a silly and simplistic statement and this will lead to a London Plan which will not work. In short this statement has been written by someone who doesn't understand how housing markets work.

User:	Regeneration X
1.4.5 Talks of brown field sites and town centres being important in the provision of new homes. If existing homes and their surroundings are being defined as brownfield sites, the London Plan is storing up a whole lot of trouble for itself. Those that live in homes do not see themselves as living on brownfield sites.	

User:	Regeneration X

1.4.6 *Build to Rent model can deliver homes for rent quickly*. But Build to Rent is more expensive than social housing. As such they must be resisted not encouraged. Going down the private sector Build to Rent model will store up a whole lot of problems for London and Londoners, as well as the country's tax-payers who will be expected to subsidise the rents. The Mayor needs to put down a marker that the failed housing model of the last 40 years is at an end in London, and Build to Rent is part of this failed model.

User:	Pat Turnbull
1.4.3. **Replace all references to affordable housing with ‘homes which most Londoners can afford to live in’.** **Amend sentence 2 to read ‘43,000 of these should be social rented’…**	

User:	Pat Turnbull
1.4.4. **All references to overall targets for delivery of homes should be removed from the London Plan. In all places where this occurs there should be specific reference to the numbers of each type of home based on the need stated in 1.4.3.**	

User:	Hackbridge & Beddington Corner Neighbourhood Development Group

We agree with this, especially with all the development in Hackbridge of over 1,000 new homes, there are no homes truly affordable to local residents.

User:	Notting Hill East Neighbourhood Forum

2.We are concerned that insufficient emphasis has been placed on greening and we would like to ensure all new units have small greened and screened usable space. So to policy GG4 We would add ' provide small screened and greened outside space.' We would also like to see greater emphasis on the role of greening to shade,cool and help clean the air and to provide a richer habitat for insects and birds as well as delaying water run-off reduce flood risk.

User: London national Park City Foundation

Delivering the homes Londoners need - Policy GG4, Page 19 - 20

LNPCF PROPOSAL: Policy GG4 does not address housing's outdoor surroundings apart from perhaps in a highly condensed way in part D of the policy:

"Identify and allocate a range of sites, including small sites, to deliver housing locally, supporting skilled precision-manufacturing that can increase the rate of building, and planning for all necessary supporting infrastructure from the outset."

Policy GG4 and its supporting text (see below) should expressly mention the need for quality open space for play, recreation and other access as a break from built development.

1.4.9 The things that make London's economy so strong are the same things that make London an attractive and exciting place to live, work and visit. London's ethos of tolerance and respect, its rich cultural and historic assets, the quality of its streets and public places, its spirit of creativity and entrepreneurialism – these things attract businesses of all sizes and allow them to develop and thrive. The people who these businesses employ need strong communities, pleasant environments that promote good health, and good quality, affordable homes in places they want to live. The continuing success of London's economy is reliant upon making the city work better for everyone.

1.4.11 The right infrastructure is also required to help businesses succeed across London. The digital economy, underpinned by world-class digital connectivity, data and digital services is of ever-increasing importance, improving processes, opening up new markets and allowing more flexible working. Convenient transport connections and street, rail and waterway networks that allow the efficient movement of goods and people are also vital, alongside the schools, healthcare facilities and other amenities that employees need to be healthy and productive.

User: Primrose Hill Conservation Area Advisory Committee

GG4 – C

Draft policy: ‘Create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing.'

Our proposed amendments – reasoning: we welcome the creation – and continuation – of inclusive communities, and of high standards of design. Both require an understanding of the distinctive sense of place in each location. Our proposed revised text would help ensure the success of this policy, and achieve consistency with rest of the Plan, and with the Plan’s stated heritage objectives.

Our proposed revised text: ‘Create mixed and inclusive communities, with good quality homes that meet high standards of design, and provide for identified needs, including for specialist housing, and respect local distinct and varied character, preserving and enhancing heritage assets.’

User:	Regent's Park Conservation Areas Advisory Committees

GG4 – C Draft policy: ‘Create mixed and inclusive communities, with good quality homes that

meet high standards of design and provide for identified needs, including for specialist housing.’

Our proposed amendments – reasoning: we welcome the creation – and continuation – of inclusive communities, and of high standards of design. Both require an understanding of the distinctive sense of place in each location. Our proposed revised text would help ensure the success of this policy, and achieve consistency with rest of the Plan, and with the Plan’s stated heritage objectives.

Our proposed revised text: ‘Create mixed and inclusive communities, with good quality homes that meet high standards of design, ~~and~~ provide for identified needs, including for specialist housing, and respect local distinct and varied character, preserving and enhancing heritage assets.’

Policy GG5 Growing a good economy

User:	Historic England

We welcome Part F of the policy promoting London’s rich heritage and cultural assets…’.

The benefits that heritage assets bring to London are multi-faceted, and we are pleased to see this recognised in para 1.4.9 referring to ‘… London’s rich cultural and historic assets, the quality of its streets and public places ...’.

User: Revo

The commitment to supporting the delivery of wider public benefits, diversification and more equitable success is welcome. There is strong evidence to suggest that small scale infrastructure and transport connections enable the growth of, and investment in, strong economies – and in the case of London, for all local communities to maximise their economic potential, better public transport links from central London to developing urban, suburban and rural areas in greater London and the commuter belt are required – particularly in light of the aims and needs of becoming a truly 24-hour city

We support protections for London's rich heritage and cultural assets, which also create unique and diverse places and generate economic activity in of themselves across education, tourism and innovative regeneration. These buildings can act as assets or focal points for new developments – as epitomized by the Highbury stadium redevelopment or repurposing of London Olympic legacy buildings for example.

User:	British Takeaway Campaign

The BTC welcomes the commitment within the draft London Plan to promote and support London’s role as a 24-hour city, of which takeaway restaurants and street markets play an important role. It is important to remember that takeaways do not just pack a huge economic punch – contributing £1.4 billion to the London economy in 2016, and supporting more than 23,000 jobs in the capital – they also play a key role in regenerating high streets and enriching local communities.

User: British Property Federation

The Mayor’s commitment to supporting the delivery of wider public benefits, such as affordable housing and an increase in physical and social infrastructure, is encouraging. We would however ask that funding provisions and infrastructure plans are in place for initiatives that provide transport (and other infrastructure) to newly built homes, to enable the growth of strong economies in local areas around London. A wealth of empirical research and academic studies[i] – including the UK government’s Eddington Study[ii] – shows a strong correlation between transport and economic activity. There is consensus that increased transport links can positively affect the rate of growth in GDP and the generation of trade and foreign direct investment[iii]. Research by the Foundation for Integrated Transport (Transport for New Homes)[iv] examined the relationship between car dependency in urban and rural areas, and the capacity to invoke successful communities with high employment, amenities, health and wellbeing. This qualitative study found a correlation between car dependent developments and communities with a lack of economic prosperity. This suggests that for local communities to maximise their economic potential, better public transport links from central London to and between developing urban and rural areas in outer and greater London is required.

We are encouraged by the Mayor’s commitment to ensuring that London is a global leader in innovation and research, which should maintain and grow a strong economy for the capital. To ensure that these commitments are achieved, any endeavour to reduce the number of international students being allowed to study in the UK must be halted. London hosts many world class universities, which contribute directly (e.g. employment) and indirectly (e.g. provision of skills) to the UK economy, so making sure that these institutions have the capacity to flourish is imperative to London retaining its prosperous economy. In 2013/14 there were 67,405 international students enrolled at London universities, 18% of the total student population in London, and despite the fall in the number of domestic students enrolling into London universities over the last five years, international student increased by 2% (+1,530 students) in 2016.[v] London’s international students bring a net benefit of £2.3 billion per annum to Britain’s economy (primarily through fees and accommodation), equating to around £34,122 per student[vi], and representing 39% of the total fee income of London’s universities.[vii] Furthermore, having international students in London improves Britain’s business influence. PwC found that international students who study in London are 60% more likely to do business with the UK because of studying there.[viii] Therefore, international students are likely to form long-term ties with London, thus helping to strengthen its business and economic influence around the world.

We are encouraged that the Mayor is committed to supporting London's rich heritage and cultural assets. There are 19,000 listed historic buildings in London, which play an increasingly central role in the delivery of a range of public benefits, including education, economic development e.g. via the tourism industry, sustainable growth, urban and rural regeneration, repopulation of inner-city areas and cultural development. These buildings can act as assets in deprived areas to become new focal points for regeneration efforts[ix].The London Plan must ensure that conservation-led and 'heritage at risk' policies promote and do not obstruct the growth of creative industries (for example in the yet-to-be defined Creative Enterprise Zones and Cultural Quarters), London's night-time economy or business innovation.

[i] Exhibited in http://www.londonfirst.co.uk/wp-content/uploads/2012/09/London_First_Connectivity_Commission_report3.pdf

[ii] The Eddington Transport Study, HM Treasury/DfT, December 2006.

[iii] Cf. London's Place in the UK Economy, 2009-10, London School of Economics for the City of London Corporation; Press statement, 25 January 2011, City of London Corporation.

[iv] https://irp-cdn.multiscreensite.com/a16e1e13/files/uploaded/Newsletter2.pdf

[v] CBRE, *UK Student Accommodation Storylines: Applications, Affordability and Appetite from Investors*, September 2017, p.2

[vi] *ibid*., p.8

[vii] *ibid*., p.7

[viii] PwC analysis & London First/PwC survey, http://londonfirst.co.uk/wp-content/uploads/2015/05/London-Calling-report.pdf, p.17

[ix] Lichfield's analysis of ONS and Historic England data

User: London Riverside BID

Policy GG5 – Growing a good economy

We support the recognition in part C of this policy that industrial space is essential is key to supporting economic development and regeneration – however, the need for space for logistics to underpin London's economy should also be acknowledged by this policy.

User:	Freight Traffic Control 2050 academic project
The body text of the report mentions the importance of transport “networks that allow the efficient movement of goods and people” but this policy point does not refer the importance of efficient goods and service transport to London’s economy	

User:	GLA Industrial BIDs Group

Policy GG5 – Growing a good economy

We support the recognition in part C of this policy that industrial space is essential is key to supporting economic development and regeneration – however, the need for space for logistics to underpin London's economy should also be acknowledged by this policy.

User:	Business for London

Balance between Housing and Economy. The Plan rightly gives a lot of attention to the provision of new housing, and especially affordable housing. However, it does not give the same detailed attention to the provision of employment space, and affordable work space. For example, GG 4 says the Plan will “identify and allocate” land for housing but GG5 is much vaguer, vis “plan for *sufficient* employment and industrial space...” Also tables 4.1 and 4.2 list specific targets for the number of houses to be built each year in each Borough but the nearest equivalent (Table 6.2) for industrial space limits itself to one of 3 non-specific options (limit release, or retain capacity or provide capacity).

User: London Wildlife Trust

This policy and supporting paras seems to assume that this can all be achieved without environmental damage. Nevertheless we consider that London's natural environment makes a significant contribution to the capital's economy, and its attractiveness to business. This is recognised in the Mayor's draft Environment, and Economic Development Strategies, and the Mayor's aim to introduce a Natural Capital approach.

We therefore would propose an additional Part H to Policy GG5 is added along the lines of:

H: Ensure that London's economy contributes to the protection and sustainable management of the natural environment, and secures net gains in its quality and quantity.

User: Uttlesford District Council

Policy T8 (Aviation) of the draft London Plan makes clear the London Mayor's opposition to expansion of Heathrow Airport. However, the same Policy acknowledges that additional aviation capacity is required in the South East, and that this is 'crucial to London's continuing prosperity and to maintaining its international competiveness and world-city status'. This is related to a number of other policies in the draft Plan, including for example, Policy E10 (Visitor Infrastructure), which seeks to promote the tourism industry across London. More pertinently, this is directly related to Policy GG5 (Growing a good economy) which seeks to enhance London's global economic competitiveness. It should be noted that promoting additional airport capacity in the South East is part of a much wider debate on how UK aviation policy should develop in the medium and longer terms. In spite of the recent consultations on the draft Airports National Policy Statement and the new Aviation Strategy (phase 1), there seems to be an emerging policy vacuum on regional airport development, which the Council regards as a serious shortcoming. This is an issue that the Local Government Association, via its Strategic Aviation Special Interest Group, intends to pursue with ministers and civil servants.

Stansted Airport (owned and operated by MAG Airports) is an international gateway to the Capital and is recognised as a 'London' airport. In 2014 the airport was handling 20 million passengers per annum (MPPA) and 230,000 tonnes of freight. The airport currently benefits from planning permission that will see capacity expand to 35 MPPA by 2025, with freight handled also increasing to 243,500 tonnes per annum. Future growth ambitions exist and a planning application has been received that seeks the airport to expand such that it can handle 43.5 MPPA by 2030 as well as 400,000 tonnes of freight per annum.

Paragraph 10.8.7 of the draft London Plan makes reference to the potential for additional flights to and from Stansted Airport, making 'better use of its single runway'. The term "better use" needs to be treated with caution. Whilst the forthcoming planning application is unlikely to propose any increase in the number of permitted air transport movements at the airport, air noise (amongst other issues) is a key issue for local residents, especially from night flights and because of low background noise levels. As the local planning authority, the Council would need to carefully weigh the economic benefits of "better use" against the social and environmental dimensions that are also integral to sustainable development.

Policy T8, and supporting text to this, also note the importance of providing improved surface access links, particularly rail, to and from airports, and that existing proposed schemes, such as Crossrail 2, should not be relied upon to cater for additional airport growth. The London Mayor calls for ‘major investment by the airport authority and central Government in new infrastructure’. The GLA also has a significant role to play and, as set out in Policy SD2 and SD3, will need to collaborate with partners and explore ways to help fund and deliver strategic surface access infrastructure which is of benefit to London and the wider South East. Indeed, given that the policy approach of the draft London Plan is to push the negative impacts of air traffic away from London to other localities, it is essential that the GLA take a proactive role in helping to mitigate the adverse impacts of such an approach.

User:	London Environment Directors' Network (LEDNet)

Policy GG5 Growing a good economy

D Ensure that sufficient high-quality and affordable housing, as well as **environmentally sustainable** physical and social infrastructure is provided to support London's growth.

User:	Moorfields Eye Hospital NHS Foundation Trust & UCT Institute of Opthalmology

Policy GG5 Growing a good economy seeks to conserve and enhance London's global economic competitiveness. Part of this involves ensuring that London continues to provide leadership in innovation, research, policy and ideas, supporting its role as an international incubator and center for learning.

We strongly support the aims of this policy. Given the status of Moorfields and UCL, the work undertaken here and the international influence, these two organisations are a clear and demonstrable manifestation of London's global competitiveness. If this competitiveness is to be conserved and enhanced, the new facility at St Pancras will give them the best possible opportunity. Furthermore, by bringing Moorfields and UCL in to the MedCity cluster, there will be further opportunities to benefit from agglomeration and to encourage the development of new organisations around them.

User: Silvertown Homes

Part C of the policy seeks to ensure that London should plan for sufficient employment and industrial space in the right locations to support economic development and regeneration.

We suggest this part of the policy should acknowledge that innovative opportunities should be considered to allow the delivery of these employment / industrial facilities with residential development, if it can be demonstrated that these proposals can deliver an appropriate living environment and will not prejudice the long-term functionality of the employment / industrial uses.

Amend part C of the policy as follows: Plan for sufficient employment and industrial space in the right locations to support economic development and regeneration, in tandem with new homes where proposals can demonstrate an appropriate living environment and will not prejudice the longterm functionality of the employment land.

User: Benhill Residents

We fear that conserving and enhancing London’s global economy - generally ongoing growth of high end business, financial, professional, education and research; seeing London as the goose that lays the golden egg, is of little benefit to lower income households in the capital (as set out in Policy E11, paragraph 6.11.1), but also to and to the economy of areas in other parts of the country.

We are concerned that the general practice in opportunity and regeneration areas has been loss of, rather than retention of existing businesses, industry and industrial land (as well as of existing social housing). Policy should focus on effectively addressing need in areas of deprivation and exclusion.

User: Elaine Chambers

GG5 Growing a good economy

We fear that conserving and enhancing London's global economy - generally ongoing growth of high end business, financial, professional, education and research; seeing London as the goose that lays the golden egg, is of little benefit to lower income households in the capital (as set out in Policy E11, paragraph 6.11.1), but also to and to the economy of areas in other parts of the country.

We are concerned that the general practice in opportunity and regeneration areas has been loss of, rather than retention of existing businesses, industry and industrial land (as well as of existing social housing). Policy should focus on effectively addressing need in areas of deprivation and exclusion.

User: Earls Court Public Sector Tenants' Assoc

We fear that conserving and enhancing London’s global economy - generally ongoing growth of high end business, financial, professional, education and research; seeing London as the goose that lays the golden egg, is of little benefit to lower income households in the capital (as set out in Policy E11, paragraph 6.11.1), but also to and to the economy of areas in other parts of the country.

We are concerned that the general practice in opportunity and regeneration areas has been loss of, rather than retention of existing businesses, industry and industrial land (as well as of existing social housing). Policy should focus on effectively addressing need in areas of deprivation and exclusion.

User:	Living Streets

We support policy GG5 and strongly support “G maximise London’s existing and future public transport, walking and cycling network, as well as its network of town centres, to support agglomeration and economic activity”. We support new development that allows trips between home, work, school and shops to be completed on foot.

User:	London Industrial and Logistics Sounding Board

Policy GG5 – Growing a good economy
We support the recognition in part C of this policy that industrial space is essential is key to supporting economic development and regeneration – however, the need for space for logistics to underpin London's economy should also be acknowledged by this policy. The policy should also recognise that industrial and logistics jobs provide a wide variety of employment, training and skills opportunities, particularly in areas outside of central London and within Strategic Areas for Regeneration.

User:	University College London

Policy GG5 Growing a good economy

UCL agrees with the emphasis that Policy GG5 places on conserving and enhancing London's global economic competitiveness. However, UCL considers that Higher Education Institutions ('HEIs') should be explicitly referenced in point E of GG5, due to the significant value they bring to London.

UCL consider that Policy GG5 should draw on Section 4.4 of the Economic Development Strategy (EDS) for London (2017). Section 4.4 of the EDS features significant mention of the benefits and value that HEIs bring to the economy through new ideas and technologies across a range of industries. These benefits are visible in London, but also both nationally and internationally.

User:	The British Library

Policy GG5 – Growing a good economy

This policy is fully supported and notably coincides with the proposed addition to policy CG2 (above), with a specific reference in Part E to ensure continuous growth of London’s reputation as an international city for innovation, research and learning.

This is vitally important to the Library itself and also future potential development opportunities to the north of the Library, to ensure that the culture for research and learning can continue to be accommodated in what is a nationally and internationally important facility within the heart of central London.

User:	Vital OKR

Policy GG5 regarding growing a good economy could usefully be tweaked and added to in order to emphasise the requirement for engagement and dialogue, and to broaden the call to plan for sufficiency of accommodation for the economy to include high street settings, including the urgent priority of extending town centre designation to cover all high streets and the use of town centre policy to manage the supply of space. We suggest a new point to Policy GG5, perhaps point F, that could describe a requirement to plan for sufficient and diverse accommodation in high street settings to support growth, through inclusive designation of the town centre network and secure appropriate development within it.

User:	The Forestry Commission

GG5 Growing a good economy - Given London has 20% tree canopy cover, it plays a major role in making the City attractive that generate investment and economic growth. The London Plan and LES ambitions for tree canopy increase will assist this and also support the provisioning Ecosystem services that the urban forest provides (wood, fruit, recreation etc).

User:	Elephant & Castle Properties Co Limited

Policy GG5 – Growing a good economy. We support this policy, and in particular note that the proposals for Elephant & Castle include a new state of the art home for UAL:LCC, supporting London’s role in innovation, research and an international centre for learning.

User: North London Waste Authority

- NLWA supports the principle of 'good growth' but we note that a larger population in the capital will generate more waste, and therefore it is imperative for London to adopt circular economy principles. The need for additional sites and facilities to handle London's waste (resources) will increase as a result.
- NLWA supports Policy GG5- Growing a good economy, but would like the Mayor to note the contribution that the circular economy could make to the capital as part of this growth strategy.
- We fully support the concept of retaining London's waste (resource) within the capital although we noted in our response to the Draft London Environment Strategy (DLES) Objective 7.4, p.289/90 that there was some inconsistency about whether the DLES seeks 100% self-sufficiency for all wastes within London by 2026 (para 1) or just for municipal solid waste (para 4). Either way, NLWA trusts that the NLP is as supportive as possible to the development of new waste infrastructure in London, particularly as reuse and recycling activities that are part of a circular economy are likely to require more space per tonne of waste managed than residual waste treatment operations. NLWA also assumes the London Plan continues to seek net self- sufficiency, and that there is no absolute requirement for all wastes to be managed in London.
- Whilst NLWA supports policy GG5, including policy GGSD to ensure that there is sufficient high quality and affordable housing, this new housing has to provide sufficient space for recycling. If we want London to be more sustainable it should not be allowable for compromises to be made e.g. between whether a new housing development has sufficient space to accommodate recycling containers or bicycle racks; we need both.
- We also support Policy GGSB regarding the diversification of London's economy insofar as a move to a more circular economy within the capital can contribute towards this diversification.

User:	Imperial College London

Imperial College London wishes to lend its particular support to objective E that seeks to ensure that London continues to provide leadership in innovation, research, policy and ideas, supporting its role as an international incubator and centre for learning.

Higher education and research organisations such as Imperial College London, can play a significant role in helping to meet this objective. Imperial College London's mission "is to achieve enduring excellence in research and education in science, engineering, medicine and business for the benefit of society". It is a global research driven organisation that seeks to address challenges in the future within each of these areas, by making discoveries, educating leaders and developing innovations. Education and innovation can play a significant role in ensuring that economic success is shared amongst all Londoners, and Imperial College London is already at the forefront of delivering, encouraging and facilitating world-leading innovation, research, policy and ideas. To help Imperial College London deliver the objectives of Policy GG5, it is therefore requested that the changes being sought below to the draft London Plan are taken into account.

User:	Aitch Group

My client has significant experience of provision of employment space as part of mixed-use development, including successfully delivering B1(b) and (c) uses alongside residential. The nature of employment space is changing within the capital and we welcome this recognition within the policy. It is necessary the policies are sufficiently flexible to support the changing employment needs in London and should not be inflexible. For example, policies should not require like for like replacement of floorspace where there is no realistic prospect of being able to let the floorspace, or if the same level of job creation can be accommodated in a more efficient way.

User: Highgate Society

GG5(D) Object

As in the Society's response to GG2 above, new housing has to include houses and flats at prices that Londoners can afford to buy or rent on the open market as well as a proportion of "affordable". Too many developments are aimed at the luxury market but there is nothing in the Planning System to legislate for sale prices that ordinary Londoners can afford

In addition, too many large schemes have been completed with inadequate infrastructure. Funding for this needs addressing.

GG5(F) Support and comment

The Society feels that Heritage Assets are inadequately protected in London. Statutory listing does offer protection, but in Highgate's case, the Conservation Areas have been woefully degraded in recent years through local authority decisions, or Appeal decisions. Local Councils are remarkably resistant to the application of Article 4 directions, which would protect these, citing lack of resources

User: Natural England

Economic activity within London and elsewhere is ultimately dependent on a healthy and resilient natural environment that provides amongst other things adequate supply of fresh water, clean air and green space, which are vital for ensuring the health and well-being of employees. Safeguarding and enhancing the provision of these benefits is therefore vital to ensure continued and growing economic activity within London, and this is recognised within the natural capital approach outlined in London Environment Strategy.

Recommendation:

We recommend that this policy include additional text which references the value of green infrastructure to London's economy, and which makes provisions to ensure that the estimated economic benefits of green infrastructure are fully taken into account by Boroughs when making planning decisions.

User: London Chamber of Commerce and Industry

Policy GG5 Growing a good economy

23. The draft new London Plan rightly recognises London as the driver of growth for the UK economy, and that the capital should continue to attract businesses of all sizes, promote entrepreneurialism and allow firms to grow and develop.

24. A growing concern of businesses has been the impact of Permitted Development Rights (PDRs) for office to residential conversions. PDRs have had an effect on the volume of office space within London. Our recent data shows one in five London businesses have moved or considered moving elsewhere in London, or out of the capital entirely, over the past year due to Brexit, rent or business rate rises13. PDRs contribute to this cost pressure by reducing office space.

25. The City of Westminster has seen an “unprecedented decline” in availability of office space, with an estimated 300,000 square metres of office floor space lost through residential conversions between 2013-1714. Analysis shows a further 730,000 square metres are due to be lost through ongoing schemes15.

26. Between 2008 and 2016, local planning authorities have lost 1.7 million square metres of office space whilst gaining approximately 16,000 residential units16. Evidence has shown that there is strong demand for industrial space in the capital17, and so to help retain office and business space, we welcome proposals urging local authorities to seek Article 4 directions.

27. LCCI acknowledges that there is a careful balancing act to be struck to ensure that the housing supply issues are addressed, whilst giving London firms the space to grow, expand and create jobs18. However, it is essential that areas of strategic importance including the Central Activities Zone (CAZ), are protected from the negative impact of PDRs.

User:	Wokingham Borough Council

WBC welcomes the recognition in Policy GG5 of the need to promote the strength and potential of the wider city region and likewise supports the proposals to plan for sufficient employment and industrial space to support economic development and regeneration.

User:	Sustrans

G – Sustrans welcomes the plan’s explicit recognition of the role of public transport, walking and cycling infrastructure in supporting agglomeration and economic activity. At a strategic level, growing London’s economy depends on the city’s ability to move people between where they live and where they work. With finite road space, this can only be achieved by shifting travel toward more space efficient means. Similarly, at a local level improving infrastructure to support more space-efficient modes of travel can, first, improve the vibrancy of places by reducing the dominance of traffic and, second, increase the people movement capacity of a street, increasing footfall and catchment areas for local shopping parades.

User: Mr Gary Hayes

GG5 Growing a good economy

We fear that conserving and enhancing London’s global economy - generally ongoing growth of high end business, financial, professional, education and research; seeing London as the goose that lays the golden egg, is of little benefit to lower income households in the capital (as set out in Policy E11, paragraph 6.11.1), but also to and to the economy of areas in other parts of the country. We are concerned that the general practice in opportunity and regeneration areas has been loss of, rather than retention of existing businesses, industry and industrial land (as well as of existing social housing). Policy should focus on effectively addressing need in areas of deprivation and exclusion.

User:	Landsec

- It should clearly state in Policies GG4 and GG5, in respect of housing and commercial development respectively, that the plan’s objective is to encourage and enable the development and growth that London needs, not to restrain it.

User: Aggregate Industries UK Ltd

Draft Policy GG5, Growing a Good Economy

In accordance with the amendments recommended above, it is considered that amendments to Draft Policy GG5 are warranted further underpinning the critical contribution that industrial sites make to London's economic success. The following amendments are recommended.

To conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, those involved in planning and development must:

C Plan for sufficient high quality employment and industrial space in the right locations to support economic development and regeneration, and continue to safeguard vital industrial infrastructure including wharves, railheads, mineral plant waste and aggregate sites.

User: Redrow Homes London Division.

Part C of the policy seeks to ensure that London should plan for sufficient employment and industrial space in the right locations to support economic development and regeneration.

We suggest this part of the policy should acknowledge that innovative opportunities should be considered to allow the delivery of these employment / industrial facilities with residential development, if it can be demonstrated that these proposals can deliver an appropriate living environment and will not prejudice the long-term functionality of the employment / industrial land.

Amend part C of the policy as follows: Plan for sufficient employment and industrial space in the right locations to support economic development and regeneration, in tandem with new homes where proposals can demonstrate an appropriate living environment and will not prejudice the longterm functionality of the employment land.

User: Cemex UK Ltd

Draft Policy GG5, Growing a Good Economy

In accordance with the amendments recommended above, it is considered that amendments to Draft Policy GG5 are warranted further underpinning the critical contribution that industrial sites make to London's economic success. The following amendments are recommended.

To conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, those involved in planning and development must:

C

Plan for sufficient high quality employment and industrial space in the right locations to support economic development and regeneration, and continue to safeguard vital industrial infrastructure including wharves, railheads, mineral plant waste and aggregate sites.

User: Sean Creighton

Policy GG5 Growing a good economy

25. London's global economic competitiveness has been largely built on the financial institutions which did enormous damage to the national and London economies in their role in the 2008 crash. Most Londoners did not share the profits that the financial institutions made, and continue to make. The bonuses of traders led to large rises in house prices, and encouraged developers to build for British and international investors leaving a large number of housing units empty as investments while thousands of Londoners live in inadequate housing, or have experience homelessness.

26. Section C of this Policy to plan 'for sufficient employment and industrial space in the right locations' is absolutely essential, given the experience in Croydon, and requires the Plan to have a blanket safeguard on all existing employment sites.

27. In Norbury the latest examples of loss are:

(1) the approved planning permission to demolish 32-24 Fairview Rd and build a poorly designed housing overdevelopment which threatens the neighbouring medical practice;

(2) the proposed plan to demolish the Norbury Trading Estate and build a predominantly housing scheme.

28. These sites are no longer available for conversion to small, affordable workspace units for the growing number of small businesses among residents and small companies wanting to move into Croydon. During the Croydon Local Plan consultation and public examination:

(1) the CTUC/CA urged a more robust policy to protect employment sites;

(2) the LNPC urged the Council to safeguard these two sites through the Plan and Article 4 Determination.

29. The Council refused to take such action, setting the scene for the loss of the two sites.

30. Section F of this Policy to ‘(P)romote and support London’s rich heritage and cultural assets, and its role as a 24-hour city’ is only partially acceptable. See para. below.

31. Section G of this Policy G to maximise ‘London’s existing and future public transport, walking and cycling network, as well as its network of town centres, to support agglomeration and economic activity’ is not achievable in many parts of London. See paras. ??? below

User:	UKWA

UKWA welcomes this policy but would like to see this strengthened to stress the need for warehousing and logistic space which is vital to maintain London’s economy and global competitiveness.

User:	Public Health England

Economic growth

? Ambitions in the London Plan for fostering inclusive economic growth are welcomed as a key strand of work needed to tackle health inequalities. Meaningful work or other activity is one of the most important determinants of health. Equally, a healthy workforce is essential to productivity and in turn growing a good economy in London. Moving into employment can have a transformative effect on the lives of those with poor mental health. Better investment in tackling worklessness will likely lead to better outcomes for the individuals transitioning into employment, their families and their wider local communitiesxxii
.

User: YMCA

OPPORTUNITY TO COLLABORATE ON ECONOMIC GROWTH

We believe in the need to better understand, and harness, the links between the new Human economy and traditional conception economic growth - taking an asset-based approach which recognises welfare as an investment (rather than a cost) Therefore, potential for a new human development institution to research this interplay and prototype relational products.

User: YMCA

LONDON YMCA UNIVERSAL BASIC INCOME TRIAL

London to differentiate itself from most UBI trials (which are lead by city governments and universities) to partner with YMCA's well-being Lab - capturing the more informal everyday capacity creation of this trial. This neighbourhood scale innovative universal basic income trial would be linked to a mutual credit and complementary currency scheme, as well as our human development gyms and reskilling centres.

User: South East England Councils

2.1 The South East and London are the drivers of the national economy, home to the UK's largest populations, and consistently deliver the highest homes growth and net financial returns to the Treasury, coming first and second respectively on key measures (see table below). It is in part the strong interdependencies between our areas that make us both successful. But it is also important to recognise that the South East is more than a commuter economy and has a strong economy in its own right, which needs investment to sustain and grow, supporting local growth plans – and continuing to make a vital net contribution to UK-wide public finances.

	South East	London
Economic size (GVA 2016, workplace-based)	£257 billion (£29k per head) 2 nd BIGGEST	£396 billion (£45k per head) BIGGEST
Population size (2017)	9.1 million people BIGGEST	9.0 million people 2nd BIGGEST
Net new homes p.a. (2016-17)	36,526 homes 2nd HIGHEST (highest in previous 2 years)	39,560 homes HIGHEST (2nd highest in previous 2 years)
15-year Net contribution to the Treasury (2000/01-15/16)	£154 billion BIGGEST	£126 billion 2 nd BIGGEST

2.2 We have discussed the key interdependencies between the South East and London at the WSE Political Steering Group, and welcome high-level recognition of these issues in the draft Plan. Through the PSG, we are keen to take political dialogue forward with you on the London Plan, and to tackle shared challenges on important shared sustainable growth issues.

User:	South East England Councils

3.5 SEEC welcomes the Mayor’s commitment to work with South East councils and other partners to secure mutual benefits on growth and infrastructure (para 2.0.5, Policy GG5/para 1.4.8). As outlined above, the South East and London are the UK’s economic powerhouses. The interdependencies that underpin our collective success rely on effective transport in both London and throughout the South East. It is vital the South East is not simply seen as London’s commuter belt – alongside your ambitions for London, South East councils are ambitious to drive forward their own strong economic growth potential, but this is being held back by inadequate infrastructure funding. These concerns are reinforced by research for SEEC showing a £15.4bn infrastructure funding gap by 2030 in the South East alone.

User:	London Borough of Camden

The strategic principles set out in Policy GG5 are supported.

To support the approach more guidance may be needed for those involved in planning and development in order to ensure that the benefits of economic success are shared more equitably.

User: L&Q

Employment mixed with residential

Part C of the policy seeks to ensure that London should plan for sufficient employment and industrial space in the right locations to support economic development and regeneration.

This principle should be carried across the Plan's policies. References to 'character' should be explicitly defined as 'physical character' (see commentary below).

User: Local London Partnership

Deliverability

This concern touches on the issue of whether the Plan is sound and, in particular, if the Policies are justified and likely to be effective. We are concerned that the Plan may not be capable of meeting the objectives spelt out in the Policies for Good Growth. We are mindful of the statement made by the Deputy Mayor for Planning, Regeneration and Skills at the London Assembly Planning Committee in answer to a question about what he Plan will deliver. *"I think it will if this blueprint is followed, because that is what it is. It is a blueprint for how it can be done, and I come back to my earlier point about the funding. If we cannot either get fiscal devolution or if the Government, alternatively, does not step back into the space of subsidising social infrastructure to levels that it was previously or approaching those levels, if all we are left with is trying to tax developments to deliver all of this, then, no, I do not think we will deliver it. However, as I say, it is a blueprint to show how it can be done and how we think growth can be handled well, including a chapter of what we think needs to be funded to be able to deliver this."* These funding needs are spelt out in Chapter 11. The chapter deals particularly with the increased investment in infrastructure and fundamental changes to the housing market needed to achieve the step change in housing delivery envisaged in the Plan. The significant need to invest in enabling infrastructure, water, energy, waste, digital connectivity and social infrastructure is also referenced. The public sector funding gap is particularly emphasised (para 11.1.8). Funding the infrastructure to support growth is a necessary prerequisite to achieve Good Growth in the Local London area.

Our concern is that these investments are dependent on public policy decisions by Government which are outside and independent of the Plan making process but are stated to be key to the delivery the London Plan policies. This makes the whole Plan uncertain. In Local London there is particular concern that the investment in public transport infrastructure required to enable Good Growth will not be forthcoming, or at least not at the same pace as housing provision, leading to adverse impacts on the Plan's Policies for Good Growth. A lack of new public transport provision will lead to greater use of motor vehicles for trips and increased road congestion, particularly in outer London, with adverse impacts people's ability to move around the City (Policy GG1/A), on health through increased pollution (Policy GG3/A) and on transport provision (Policy GG5/G) and Policy T3

User: dp9

Policy GG5 – Growing a good economy

We support the promotion of London’s economic development, but question why affordable housing is included as element D in this policy when policy GG4 already identifies the strategic requirements for new housing. Economic development needs to be given appropriate weight in the Plan, rather than being relegated behind the provision of affordable homes.

RECOMMENDATION: Remove the reference to affordable housing in Part D.

User:	Kingston First

In addition to securing improvements to the physical, public realm, Kingston First also supports draft Policy GG5, which aims to support the economy. Kingston First supports the option of diversifying use where appropriate as this approach will enable town centres to react to any changes in demand and remain relevant to the changing needs of the population

User:	Berkshire Strategic Planning Group

The recognition in Policy GG5 of the need to promote the strength and potential of the wider city region is welcomed and supported as are the proposals to plan for sufficient employment and industrial space to support economic development and regeneration.

User:	Berkshire Strategic Planning Group

The Plan commitment to work with South East councils and other partners to secure mutual benefits on growth and infrastructure (para 2.0.5, Policy GG5/para 1.4.8) is welcomed. There is a significant infrastructure funding gap across London and the south-east which should be a shared priority to help secure economic prosperity.

User:	London and Continental Railways

Alongside this, draft Policy GG5 is clear that those involved with planning and development must plan for sufficient employment and industrial space *in the right locations* to support economic development and regeneration. As such, the Mayor should support boroughs in carrying out this plan-making process. The same draft policy also refers to those involved in planning and development also ensuring that there is sufficient high-quality and affordable housing, and physical and social infrastructure provided, to support London’s growth.

User: Battersea Project Land Company Limited

Policy GG5 – Growing a good economy

We support the promotion of London's economic development, but question why affordable housing is included as element D in this policy when policy GG4 already identifies the strategic requirements
for new housing. Economic development needs to be given appropriate weight in the Plan, rather than being relegated behind the provision of affordable homes.

RECOMMENDATION: Remove the reference to affordable housing in Part D.

User: Ashden (a charity)

The text for this policy includes most aspects of a strong, inclusive and ‘good’ economy, such as housing, supporting innovation, and nurturing culture. Sustainability is missing on that list. A ‘good’ economy for London must inherently be a low carbon one, which has taken advantage of the growth opportunities of the transition. If we fail to tackle climate change and ensure that homes, commercial and public buildings are sustainable, then rising energy costs and the costs of dealing with the impacts of unabated climate change will stymie London’s economic growth.

Therefore, the text on the good growth policy 5 should make it clearer that those involved in London’s planning and development should be aiming to support the transition to a zero carbon London by 2050, alongside the other important aspects of good growth which the policy already features.

User:	Regeneration X

1.4.8 The draft plan talks of London and the wider South East being engines of the UK economy and the wealth it generates is essential to keeping the whole country functioning, but the benefits of economic success are not shared evenly within London itself. There is no mention of the harm London does to the economy of the rest of the UK, nor are there any policies for how this can be mitigated and the position changed in the short, medium and long terms.

User: Regeneration X

1.4.10 *Projected growth towards 6.9 million jobs by 2041 provides opportunity to strengthen London's economy for the future and doing so will depend on increasing diversification. The CAZ and Northern Isle of Dogs will remain vital .....but growth in town centres across London will be equally important, supporting local regeneration. Reasonably priced, good quality employment spaces will be needed across London to make this happen*. Regeneration is very different from property development, and it is not clear in the draft Plan if the Mayor and his policies understand this. Transport patterns and, therefore, the needs to make London's town centres function are very different to those needed to make Central London and its CAZs work – there seems to be no recognition of this. It is not 'reasonably priced' employment premises that are required but cheap premises and 'appropriate' quality along with a range of qualities. Extreme care must be taken not to lose premises which existing businesses rely on. In the same way that the Mayor's and the UK's housing policies are not delivering housing for everyone who needs it, but is only working for the rentiers, business premises are going the same way, and this must be avoided.

User:	Regeneration X
1.4.11 Talks about the right infrastructure which is required. Although Environmental Infrastructure is mentioned elsewhere in the draft Plan we would like to see it specifically mentioned here. The multiple benefits of green infrastructure must be recognised and delivered.	

User:	Regeneration X

Policy GG5 talks about public transport and cycling networks as well as its network of town centres, to support agglomeration and economic growth. It must be understood that London's town centres function in very different ways to central London's CAZ (and much of the CAZ is actually different from the core of the CAZ). The draft Plan doesn't seem to understand this.

User: Atkins

GG5 Growing a good economy sets out the policy priorities for the economy. Policy GG5 does not directly reference outer London revitalisation, so it is not clear what approach the Mayor is seeking for outer London's economy. We believe the Plan (policy GG5) should address the unique role that outer London can play to help diversify London's economy and maintaining its global competitiveness. In particular London's small growth sector businesses can find it hard to compete for central London prime employment space, and business that help to support London's Central Activities Zone are being pushed out as commercial space is converted to residential. Outer London can help provide space for these economic activities. To do this London Plan policy needs to ensure that outer London can be adapted to the changing economic landscape London will see over the lifetime of the London Plan. This will mean ensuring a stock of employment land is retained in outer London to accommodate the businesses that support the functioning of the CAZ. There is also a need to think more creatively about how existing office locations in outer London meet the changing needs of businesses in the future as businesses in the growing creative industries sectors seek more flexible and adaptable space that is mixed with other uses and allows co-working.

The spatial development pattern that is promoted in the London Plan is key to delivering homes and jobs. There remains a focus on the Central Activities Zone (CAZ), but the plan identifies the potential of outer London, where the suburban pattern of development is appropriate for intensification over time (chapter 2, para 2.0.3 and Policy SD1). The London Plan is not clear on what would be an appropriate level of intensification in outer London and doesn't define appropriate intensification.

User:	Notting Hill East Neighbourhood Forum
1.4.9 We would like to see 'improving the visual quality of the city' enshrined in the plan also.	

User: London national Park City Foundation

Growing a good economy - Policy GG5, Page 21

LNPCF PROPOSAL: LNPCF finds that Policy GG5 does not explicitly cover nature and quality green and natural space and that either parts D and F of the policy should be strengthened and made more explicit to mention the need for quality green open space for a range of reasons, or that a new part G should capture this:

CURRENT TEXT:

To conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, those involved in planning and development must:

1. Promote the strength and potential of the wider city region.
2. Seek to ensure that London's economy diversifies and that the benefits of economic success are shared more equitably across London.
3. Plan for sufficient employment and industrial space in the right locations to support economic development and regeneration.
4. Ensure that sufficient high-quality and affordable housing, as well as physical and social infrastructure is provided to support London's growth.
5. Ensure that London continues to provide leadership in innovation, research, policy and ideas, supporting its role as an international incubator and centre for learning.
6. Promote and support London's rich heritage and cultural assets, and its role as a 24-hour city.

LNPCF PROPOSES ADDING:

1. Ensure development and regeneration provides quality green open space for play, recreation and other access as a break from built development and to ensure all schemes play an active role in restoring nature, public health and London's resilience.

LNPCF supports the intention of the supporting paragraphs on page 27:

2.0.2 London’s green and open spaces are a vital part of the capital. Its parks, rivers and green open spaces are some of the places that people most cherish and they bring the benefits of the natural environment within reach of Londoners. London’s Green Belt and Metropolitan Open Land designations (see Chapter 8) serve to protect these strategically important open spaces, prevent urban sprawl and focus investment and development on previously developed land.

2.0.4 … proper planning of utilities and communications capacity and the social infrastructure that supports the day-to-day lives of Londoners, well in advance of new development. Opportunity Area Planning Frameworks and Local Plans should have clear strategies for their delivery.

User:	Essex County Council

The role that a sustainable supply of minerals and effective waste management play in growing a good economy and increasing efficiency and resilience should be highlighted in these overarching policies. Economic and residential development can only occur when sufficient minerals can be economically sourced to facilitate their development, whilst economic activity generates waste which must be managed as locally as possible to ensure a cost effective waste solution for the local economy. There is a brief mention of this in relation to the Circular Economy at paragraph 9.7.1 but such principles would be well served by being included within the ‘Planning for Good Growth’ section.

Policy GG6 Increasing efficiency and resilience

User:	Natural England

We support the Mayor’s aim for London to be more efficient and resilient. As per our comments on Policy GG5, a healthy and resilient natural environment is key to achieving the aims of this policy.

User:	Natural England

Recommendation:

As per the Environment Agency's response to this policy, we recommend that paragraph 1.5.5 highlights the role of green infrastructure in securing a zero carbon city, which would also contribute to achieving green cover targets, and would support the policies in chapter 8.

User: London Chamber of Commerce and Industry

Policy GG6 Increasing efficiency and resilience

“For us it is a major issue that so many firefighters in the London Fire Brigade can’t afford to live in the Greater London area. Housing in London is so expensive that firefighters often can’t live anywhere near their place of work. This can cause all sorts of practical difficulties because it may take at least a couple of hours for people to reach their place of work. There might then be that slight added risk that they won’t be as fresh as they would like to be when they arrive for work, or their concentration is impaired. It also means they are spending less time with their families and their children and their stress levels increase when they are at work.”

Paul Embery, Executive Council Member, Fire Brigades Union London

28. Global cities, such as London, face a multitude of threats. Preparedness and the ‘resilience’ to overcome threats and challenges must form part of the capital’s DNA. We believe that an important part of delivering this resilience is by ensuring London has sufficient numbers of emergency services personnel available and in the best possible position to respond to future threats and challenges.

29. Our 2014 housing report19 first identified how the capital’s chronic undersupply of housing could affect its resilience.

30. LCCI urges the Mayor to use the London Plan to formally identify the need for specialist emergency worker housing as an important planning issue for London, in a similar way that previous reviews of the London Plan concluded there was a need for housing provision for older people and students20.

31. Our recommendation was incorporated within the Harris review which analysed London’s preparedness to respond to a terrorist incident21.

User: CIBSE

We fully support these intents. Achieving them will rely on robust policies, implementation and monitoring.

We have highlighted throughout this Plan recommendations for where the current policies could be strengthened, including SI2 and SI3 – Policies towards a zero-carbon city, SI7 – Circular Economy, Chapter 8 – Green Infrastructure, and Chapter 12 - Monitoring.

GG6-A: We very much welcome the prominent role given to energy efficiency as part of the ambition to become a zero carbon city by 2050.

We would stress that energy efficiency objectives should apply to existing buildings as well as new buildings – while in theory covered by the same policy, these are often not required to demonstrate significant improvements in practice. In our response to policy SI2 we have highlighted recommendations for carbon saving opportunities on major refurbishments that are subject to planning applications, as well as energy retrofit opportunities through the use of carbon offset funds.

GG6-B: We support the need to consider the impact of climate change and develop adaptation strategies. We would stress the potential of green infrastructure to contribute to these; in particular, green infrastructure can provide a local cooling effect and improve rainwater run-off management, i.e. help with the two likely most tangible effects of climate change in London, as well as enhancing air quality. This key role of green infrastructure for climate change adaptation and resilience is one of the reasons why we are advocating for a strengthening of these policies (among other benefits such as carbon emissions and air quality) – see our response to Chapter 8.

We would encourage adaptation strategy programmes which are informed by central government efforts, including the upcoming National Adaptation Plan2, based on the 2017 UK Climate Change Risk Assessment3; we note however that policies by the Mayor of London are likely to go further than national efforts, as acknowledged recently by the Environment Agency4. This is an opportunity for the Mayor of London to demonstrate leadership.

As noted above in relation to Health Impact Assessments, we suggest that Local Authorities would greatly benefit from additional resources (e.g. staff, training, guidance) on this policy, and as with HIAs we would be willing to assist the Mayor in the development of guidance and identification of existing material to support local authorities and the development community.

User: Glass and Glazing Federation

GGF response to paragraph 1.5.2 (page 22): the London Plan sets an ambitious target to "become zero carbon by 2050 by increasing energy efficiency, including through the use of smart technologies, and utilising low carbon sources"

- The Mayor should acknowledge that thermally efficient glazing on widows and doors will be as influential in increasing energy efficiency as smart technologies and sourcing energy from low carbon sources.
- We believe that the sub-standard (in terms of thermal efficiency) windows and doors in the existing housing stock must be prioritised when implementing policies to improve energy efficiency. This will support the Mayor to achieve his goal to make London a zero carbon city, as the greatest challenge in terms of energy efficiency is the inefficient existing housing stock.

Retrofit

- Promoting energy efficiency in existing homes in London has numerous economic and social benefits, such as:
  1. **Helping the Mayor to achieve his ambition for London to be a "zero-carbon city"**
  2. **Reducing the cost of living, especially for the fuel poor, by lowering energy costs**
  3. **Helping Londoners to live and work in more comfortable homes and offices**
  4. **Supporting the businesses and jobs within the energy efficiency sector in London**
  5. **Contributing towards reducing costs to the NHS by keeping people out of fuel poverty and ultimately out of hospital. Public Health England recently found that 10% of excess winter deaths in 2013 were attributable to fuel poverty[1]**

- Homes are currently being retrofitted at less than half the rate needed to reach the original target of 2.9 million homes retrofitted by 2025 – a target set in the 2011 Climate Change and Energy Strategy.

Recommendation: In order to achieve Policy GG6, City Hall should establish a new fund to be exclusively used for tackling the poor record of energy efficiency in the existing residential and commercial building stock.

User:	Sustrans
Sustrans welcomes the focus on a zero carbon city by 2050, through a low carbon circular economy. Active travel has a critical role to play in reducing transport emissions.	

User:	Mr Chris Rose
GG5 requires a net reduction in resource take, not just resource efficiency.	

User:	Mr Robert Allenby

We strongly support these measures, in particular: improving energy efficiency and the move to a low carbon circular economy; and ensuring building and infrastructure are designed to adapt to a change climate. They could be more clearly integrated and signalled within the section on Housing. There could also be more on waste and recycling in this section.

User:	Landsec

GG6 – Increasing efficiency and resilience: Landsec support the aspiration of the policy and agrees that all developments need to help contribute to a more environmentally sustainable future. However, the draft Plan is currently lacking important details in defining what is meant by “zero carbon” to ensure that the desired outcome is achieved. At present the policy is too reliant on Carbon Off Set payments and doesn’t clearly state how we can achieve the Zero Carbon we are aiming for. The London First representations provide a detailed and robust response in this area and we ask that you consider the amendments they have proposed. We provide further detail on this below under our comments in relation to Chapter 9.

User: Landsec

Chapter 9 Sustainable Infrastructure

We support most of the environmental and sustainability objectives of the London Plan. However, we feel that in some areas the Plan lacks clarity and policy could be better defined to help ensure the desired outcome is achieved.

User:	Kent County Council

The following amendments (in red) are recommended to sharpen focus on resilience threats:

B Ensure buildings and infrastructure are designed to adapt to a changing climate, making efficient use of water, reducing impacts from extreme weather events like storms and heatwaves, and mitigate against urban heat island effect.

C Create a safe and secure environment which is resilient against the impact of emergencies including fire, flooding and terrorism.

User:	London Borough of Camden

The strategic principles set out in Policy GG6 are supported.

An integrated approach to infrastructure delivery is welcomed but sufficient funding is needed from both the private and public sectors.

User:	Wimbledon East Hillside Residents' Association

On Sustainability. The western world is changing from a profit-based economy to one of sustainable growth, respecting environmental impacts and the need to ensure health and well being of its citizens. The London plan does not place sustainability at the heart of the Plan, and this is a great shame.

User: Socialist Health Association London

GG6

To help London become a more efficient and resilient city, those involved in planning and development must:

1. seek to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zero carbon city by 2050.
2. ensure buildings and infrastructure are designed to adapt to a changing climate, making efficient use of water, reducing impacts from natural hazards like flooding and heatwaves, and avoiding contributing to the urban heat island effect.
3. create a safe and secure environment which is resilient against the impact of emergencies including fire and terrorism.
4. take an integrated approach to the delivery of strategic and local infrastructure by ensuring that public, private, community and voluntary sectors plan and work together.

RISKS TO HEALTH & WELLBEING

Climate change

Climate change is the gravest risk to the future of the planet and to Londoners.

This involves use of transport, home utilities, refuse disposal and recycling as well as increasing green spaces and green buildings design. Also best practice within public sector buildings and private businesses must be encouraged and enabled.

We all have to act responsibly and many factors in this report relate to this in a profound way.

Our responses to green housing, air quality management and transport relate to this point.

We endorse and recommend the work of the Town and Country Planning Assoc in this regard.

https://www.tcpa.org.uk

Rather than write extensively on this we recommend the work of our fellow Soc Soc SERA in this area http://www.sera.org.uk

Emergency response capacity

See P 32

Buildings design

As above – we recommend the work of the TCPA.

Overall, for healthy living, we recommend green design and development which works and which does not take advantage of nor let down communities

User: Highams Park Planning Group

SUSTAINABILITY (SUS)

Development shall be climate resilient and of high environmental sustainability standards (Objective 7).

The desire for higher environmental sustainability standards stems directly from the community value of its local leafy character. To maintain and enhance this character is regarded as a key objective. Yet, climate change, of 2o C or more, will have a major influence on this, with many of our current flora unlikely to thrive under such conditions. Consequently, these policies seek to address both the causes and the impacts of climate change. Explanations, supporting evidence, ‘Acceptable Options’ and suggestions of how to meet or exceed the sustainability requirements of this plan are contained in Annex 3.

The Plan Area offers various local opportunities for implementing policies which enhance existing borough, London and national policies.

POLICY SUS1: Climate Change, Resource Efficiency and High Environmental Standards:

All development shall be climate resilient and of high environmental sustainability standards.

All developments shall:

i. Be ‘Zero Carbon’ for all sizes of development and for residential and non-domestic buildings. This provision uses the London Mayor’s definition of Zero Carbon.
ii. Harness their roof area resource to generate renewable energy with the aim of displacing an additional 20% of carbon emissions over current national and regional standards.
iii. Use the London Mayor’s ‘Cooling Hierarchy’ to maintain comfortable future summer conditions, without needing air-conditioning.
iv. Use the London Mayor’s ‘Drainage Hierarchy' to reduce rainwater run-off rates to ‘greenfield’ levels. Small developments can alternatively use ‘Acceptable Options’ Sustainable Drainage (SuDs) measures.
v. Be Air Quality Neutral. An impacts summary with evidence is to be provided. Small developments can alternatively use ‘Acceptable Options’ Air Quality measures.
vi. Non-domestic development greater than 1000m2, should aim to achieve BREEAM ‘Excellent’ or equivalent. As an ‘Acceptable Option’ smaller developments can provide a BREEAM ‘Excellent’ Pre-assessment Checklist for implementation on site.
vii. Developments that are unable to meet on-site vegetation, carbon, renewable energy generation, and rainwater run-off policy standards, should provide offsetting measures elsewhere within the Neighbourhood Area to meet the shortfall. This could include monetary payments to be held by the Planning Authority and to be used in the Area for implementation of equivalent measures, including the upgrading of existing building stock within the Area.

User: UK Power Networks

Operational Resilience

In these days of increasing risks and threats from ever changing technological, commercial and environmental challenges it is vital to be more adaptable, flexible and agile. These characteristics are typical of a resilient organisation.

Based on an initial study and report by the UK Government's Emergency Planning Office (EPC) in 2015, we have been developing a strategy and operational framework that brings together and strengthens all risk-related disciplines and activities. This ensures that we are prepared for the events – both planned and unforeseen – that may affect our ability to 'keep the lights on'.

Being a resilient business is relevant to all aspects of our operations. The scope ranges from ensuring that we can cope with extreme weather events (see flooding section below) to having access to sufficient resources, including staff, information technology and finance, to meet our customers' needs on a day-to-day basis. An example of this can be seen in our RIIO-ED1 business plan in which we set out our plan to establish an additional depot specifically in central London area. This has seen the acquisition of 100 additional staff based in Covent Garden, with teams ready to respond 24 hours a day, seven days a week. This has been a great success and helped significantly reduce the time it takes for us to arrive at a power cut, and as such we aim to achieve:
? To be on site within 30 minutes for a low voltage (LV) fault;
? An average completion time for LV faults of 170 minutes; and
? All customers restored within 60 minutes for a high voltage (HV) fault.

To ensure that our assets are appropriately resilient, we work closely with local planners, developers and communities incorporating advice and requirements through our relationship with London's police forces, central government (e.g. BEIS) and agencies (CPNI and NCSC) along with local authorities and partnerships (such as London Resilience Partnership). This ensures we are able to mitigate and manage any incident with the potential to disrupt our operations and effect our ability to provide a service to London.

User: UK Power Networks

Flood Resilience

We have sought to deliver flood protection measures in London that are cost efficient and deliver the maximum risk reduction to improve the number of customers protected. Resilience in the supply network ensures that customers supply can often be quickly re-established at minimal inconvenience following flooding of critical equipment. Flood mitigation of vulnerable sites are prioritised where there are high numbers of 'unrecoverable[24]' customers connected to a vulnerable site.

Since 2011 in excess of twenty vulnerable substations have been protected from flooding in London with a similar number in the pipeline for protection during the remainder of the RIIO-ED1 period. This amounts to nearly half a million additional customer supplies protected. Flood events such as the incidents in Tooley Street, London (April 2008 and May 2009) have highlighted the risk that substations (particularly subterranean sites) are subject to surface water flooding. As a result, our London flood programme has focused primarily on surface water flood protection at sites with plant and equipment below ground level. Following site-specific assessments, at risk sites have had flood protection measures in the form of bunding, floodgates and sealing of duct and cable entries implemented during the past few years to mitigate this risk.

Where substation sites are developed and new buildings and plant are installed, guidance documents are available to assist engineers and third parties in identifying flood risk and protecting new plant and equipment. This will normally be achieved by raising the critical equipment above the environment agency 1:100 or 1:1,000-year flood levels.

[24] Many substations have high levels of interconnection, meaning load can be transferred from site to site to manage demand. 'Unrecoverable' customers are defined as those customers who cannot have their supply switched to an alternative substation (i.e. one not affected by a flooding event) due to limited interconnection at the flooded site

User: UK Power Networks

Cyber Resilience

The protection and resilience of our information systems and operational technology is of critical importance to UK Power Networks. We have a dedicated Cyber Security team and specialist support partners who oversee and operate a comprehensive set of cyber controls and measures. These are aligned to ISO27001, complaint with the Smart Energy Code and positioned to address all the requirements of the forthcoming Network and Information Systems (NIS) Directive.

Our cyber security strategy is underpinned by the following hygiene factors which are embedded into the design, build, testing and operation of our IT systems and processes:
? Least Privilege – only allowing minimum necessary access with strong authentication methods;
? Segmentation – designing the IT systems and networks in a way that provides defence in depth against cyber-attacks;
? Resilience Testing – routinely moving our IT application and services to failover states to validate their health and reliability;
? Continuous 24/7 monitoring - detecting and reacting to cyber threats and attacks at the earliest opportunities;
? Practising Incident Response – routinely exercising our processes against realistic attack scenarios;
? System Maintenance – operating a continuous monthly cycle to apply security updates;
? Advanced Security Testing – routinely testing our networks & systems with skilled ethical hackers; and
? Security Awareness & Education – Using our ‘Security Matters’ campaigns to continuously provide our people and partners with the knowledge and skills to better protect our information and systems (including continuously sending test phishing emails randomly across all our email users to assess their vigilance levels)

We recognise that swift and effective exchange of security intelligence and learnings with our industry peers and government stakeholders is vital to protecting our business and ultimately the UK’s critical national infrastructure, particularly given the strategic importance of London.

User:	Ashden (a charity)

GG6 main text: The wording for this policy should set a clearer and stronger expectation for planners and developers that all development in London contributes towards the city becoming zero carbon by 2050.

Where it does address energy efficiency, the language should be less equivocal, making the expectation on developers clearer and stronger. For example:

“Seek to iImprove energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zero carbon city by 2050.”

User:	Ashden (a charity)

1.5.1 – 1.5.7 text: The text which precedes the GG6 policy itself is very negative in tone, focusing on threats and limits. The threat of climate change is of course central to London's ambition to become zero carbon by 2050. But the opportunities the transition offers for making London a cleaner, more pleasant, resilient and economically stronger place to live, also inform this vision. None of that comes across in 1.5.1 – 1.5.7. It should be more positively framed, so that planners and developers can see how development can contribute positively to London's move to being zero carbon.

User:	Regeneration X

Policy GG6 says that London will becoming zero carbon by 2050 and that we must ensure that buildings and infrastructure are designed to adapt to a changing climate. Words are not enough. Planners must resist development which does not or is not designed to do this.

User:	Essex County Council

The role that a sustainable supply of minerals and effective waste management play in growing a good economy and increasing efficiency and resilience should be highlighted in these overarching policies. Economic and residential development can only occur when sufficient minerals can be economically sourced to facilitate their development, whilst economic activity generates waste which must be managed as locally as possible to ensure a cost effective waste solution for the local economy. There is a brief mention of this in relation to the Circular Economy at paragraph 9.7.1 but such principles would be well served by being included within the ‘Planning for Good Growth’ section.

Policy H1 Increasing housing supply

User: Halfords Limited

5. Why are Policies SD8 and H1 Unsound?

5.1 Paragraph 182 of the NPPF states:

‘**The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is “sound” – namely that it is:**

• Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
• Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
• Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
• Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.’

5.2 Halfords consider that policies SD8 and H1 are unsound in that they are inconsistent with three of the four tests:
1. That they have not been positively prepared;
2. That they are not justified and are not the most appropriate strategy; and
3. That they are inconsistent with national policy.

5.3 The following provides Halfords' grounds in these regards —

1. The two policies have not been positively prepared

5.4 The two policies target retail warehousing for residential use. The policies are damning of such a retail format due to them being of a low-density, this is borne out in the negative approach adopted in the plan through the language used in Part A, subsection 2 of Policy SD8 where the plan requires development plans to – '**…firmly resisting out of centre development of town centre uses in line with the sequential approach…**'

5.5 This approach is at odds with the National Planning Practice Guidance, which is positively framed, requiring applicants to demonstrate compliance with the sequential test, such that '**if there are no suitable sequentially preferable locations, the sequential test is passed**.' There is no firm resistance at the national level but an acknowledgement that some retail formats cannot be located in-town and therefore, to be acceptable, there is a need to demonstrate compliance with the test, and, if passed, the development should be capable of proceeding (subject to other relevant tests, including the impact test (where relevant)).

5.6 Halfords are a first-wave retail warehouse operator, with a presence on retail parks up and down the country. They have not been approached by the GLA or the authors of the evidence base as part of the plan-making process and the policies, so drafted, have very serious implications for them to be able to ensure that their stores can continue to operate within London. This has very serious implications for the retailer's customers and its employees. The plan has not been positively prepared in this regard.

5.7 The plan clearly sees housing development as being more important to retail warehousing. Halfords understand and acknowledge the need for additional housing within London but do not see why this should be to the complete detriment of a well-established and important format of retailing. The policies are far too biased in favour of the residential developers.

2. The Policies are not Justified and are not the most appropriate strategy

5.8 We have reviewed the Plan's evidence base on the topic of "Economy" to seek to learn of the source of those parts of the two policies against which Halfords object. This includes a review of the London Town Centre Health Check Analysis, GLA (January 2018) and its appendices. Within that documents there is no *relevant* reference to retail warehousing apart from in respect of Brent Cross ("a large out-of-centre retail park"[4]), which it identifies could be reclassified as a Metropolitan Centre.

[4] Paragraph 15.3.5

5.9 There is no reference or recommendation that out-of-centre retail warehouses or retail warehouse parks should be “firmly resisted” or released to “deliver housing intensification through redevelopment”. The choice to do so does not therefore seem to be backed up by facts and, as will be demonstrated shortly, is not backed-up by national planning policy.

5.10 Halfords acknowledge that many of their stores and retail parks (in which their stores are accommodated) are in edge-of-centre and out-of-centre locations because of their trading format. Halfords acknowledge and have always worked with local planning authorities to deliver their stores or store extensions through the established tests of national planning policies (including the sequential and impact tests). It is the carte blanche freedom that the two policies give to residential development proposals and the implications this has for the supply of large format retail floorspace within London which Halfords objects to. The plan appears to have cherry-picked those national planning policies seeking increased residential growth and the high-density use of previously developed land over a requirement to plan positively for those town centre uses that cannot be accommodated in town centres. Reference to the latter is entirely non-existent. The changes to the policies which are provided in the following section seek to readdress the balance so that the policies are consistent with national planning policy.

3. The Policies are inconsistent with national policy

5.11 As highlighted in Section 2, the NPPF and NPPG requires authorities to plan positively to identify the most appropriate alternative strategy for meeting the need for those main town centre uses which cannot be accommodated in town centres, having regard to the sequential and impact tests. The policies are inconsistent with these requirements. We do not consider that there should be a departure from national policy, particularly given the recent trend identified in Section 4 and the implications of this. There is clear evidence that retail warehousing is diminishing at a rate within London. As the Draft Plan illustrates an opposition to the very notion of out-of-centre retail floorspace in the tone of Policy SD8, Halfords have serious concerns that further store closures will be inevitable. As highlighted, we set out some changes to the wording of the draft policies in the following section to address the imbalance.

5.12 Halfords have concerns that as well as the policies being inconsistent with national planning policy concerning town centre uses, there will be an adverse impact on the principles of sustainability. These are explored briefly below:

a) The Economic Role
By not planning for large format retail warehousing the Plan does not “ensure that sufficient land of the right type is available in the right place”. The plan also fails at “coordinating development requirements”, by clearly favouring one form of land use over another. The closure of retail warehouses also results in job losses.

b) The Social Role
Fewer stores mean that people do not have access to this particular type of local service. An example would be that whilst people may have greater housing choice through the policies as currently drafted, there will be limited facilities for occupiers to be able to subsequently furnish them if there are no stores in any reasonable proximity to choose and pick carpets and furniture etc. They will need to travel greater distances by car to access a diminishing pool of retailers, for example in retail parks on the other side of London to where they live. As much of the housing is car-free it may actually be impossible to purchase such products as customers will simply have no means of transporting bulkier goods home. This places a reliance on mail order products (which are more likely to be returned as customers are unable to see or test them before ordering) and a reliance on deliveries by HGVs. This does not support the government’s wish to move to a low carbon economy.

Halfords have given consideration to opportunities for click and collect facilities as a response to diminishing store numbers within London, however this form of “shopping” is less relevant to Halfords’ product range as their customers are more reliant upon, and guided by, in-store expertise on their products, particularly if the customer has no particular knowledge of appropriate components and/or seeks to discuss options related to safety-related products (such as infant car seats). Halfords’ staff are given significant expert training in these areas.

As highlighted in Section 2, Halfords’ business model relates to customers being able to keep their cars in a roadworthy condition; purchase and have fitted car parts (including bulbs, wiper blades, batteries, infant car seats etc); purchase leisure goods (camping equipment, roof boxes etc); purchase cycles and the offering of facilities for the upkeep of cycles (to promote sustainable forms of transportation). These all provide a valuable social role. These product types inform their store sizes, configurations and requirements for car parking - the combination of which means that their stores have traditionally been located outside of town centre environments and which must be planned positively for. Halfords, and other retail warehouse operators with genuine locational and format needs, are not the enemy of the high street but provide a form of retailing that is complimentary to that capable of provision within town centres.

At paragraph 2.8.1 of the Draft Plan it is stated that “Out-of-centre development can be particularly detrimental to town centres…" This may be true of those traditional high street retailers (such as fashion retailers) who have sought to occupy large format retail floorspace without regard to the rationale of such floorspace being provided in the first place (see paragraph 2.4, above), as they are more likely to be in direct competition with the high street. Halfords do provide some small in-town stores (the Halfords Metro format), but these operate alongside their retail warehouses and provide a different product mix; and not withstanding this Halfords have closed a number of these store this year (leaving only a handful remaining) because the format is not satisfactorily in-line with their strategic business model as they are only capable of providing a limited range and are unable to offer any ‘We Fit’ provision.

c) The Environmental Role
As set out in the example above, fewer stores means that Halfords’ customers must travel further to access their products. As bulky goods retailing is reliant on car-borne journeys the erosion of facilities will require longer distance trips. This will have an adverse impact on the government’s aim to move towards a low carbon economy.

User: Halfords Limited

6. Recommended changes to Policy SD8 and H1

6.1 As stated, Halfords support the need for increased residential units and the efficient use of land. Halfords have also been in a position (Cantium Retail Park, Old Kent Road) where the landlord has sought to re-accommodate them into their redevelopment plans, however the format offered (a considerably smaller quantum of floorspace, little or no parking, no provision for on-site vehicle diagnostics and fitting) meant that their retail format is incapable of being provided. In the example of Cantium Retail Park, Halfords' Property Team considered what was offered with a significant degree of flexibility, however their retail model simply could not be considered compatible.

6.2 The following sets out the changes Halfords would wish to see to the two policies to address the clear bias in favour of the residential developers and so that the boroughs "plan positively" for the retail format. The suggested deletions are crossed-through and the additions are provided in bold text.

Policy H1

A. Table 4.1 sets the ten-year targets for net housing completions which each local planning authority should plan for. Boroughs must include these targets in their Development Plan documents.

B. To ensure that ten-year housing targets are achieved:

1. boroughs should prepare delivery-focused Development Plans which:

a. allocate an appropriate range and number of sites that are suitable for residential and mixed-use development and intensification

b. encourage development on other appropriate windfall sites not identified in Development Plans through the Plan period, especially from the sources of supply listed in B2

c. enable the delivery of housing capacity identified in Opportunity Areas, working closely with the GLA.

2. boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity:

a. sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m of a Tube station, rail station or town centre boundary[35]

b. mixed-use redevelopment of car parks and low-density retail parks, **in accordance with the tests in part A(4) of Policy SD8**

c. housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses

d. the redevelopment of surplus utilities and public sector owned sites

e. small housing sites (see Policy H2 Small sites)

f. industrial sites that have been identified through the processes set out in Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function.

C. Boroughs should proactively use brownfield registers and permission in principle to increase planning certainty for those wishing to build new homes.

D. Boroughs should publish and annually update housing trajectories based on the targets in Table 4.1 which identify the sources of housing capacity (including windfall) expected to contribute towards achieving housing targets and should work with the Mayor to resolve any anticipated shortfalls.

E. Where new sustainable transport infrastructure is planned, boroughs should re-evaluate the appropriateness of land use designations and the potential to accommodate higher-density residential and mixed-use development, taking into account future public transport capacity and connectivity levels.

F. On sites that are allocated for residential and mixed-use development there is a general presumption against single use low-density ~~retail and leisure parks~~ **forms of development.** These developments should be designed to provide a mix of uses including housing on the same site in order to make the best use of land available for development.

User: Halfords Limited

7. Conclusion

7.1 Halfords are supportive of the need to increase housing supply within London, but not so to the complete detriment of large format retail warehouse operators. The emerging Plan does not accommodate such specialist forms of retailing and the two policies do not appear to be backed by evidence.

7.2 There has been a recent serious erosion in the provision of large format retailing within London. The emerging policies, if not amended to acknowledge and support such specialist forms of retailing, will have serious implications for the future of this form of retailing. The approach conflicts with national planning policy which requires plan-makers to plan positively for such town centre uses. They are also in conflict with the three dimensions to sustainable development, including that relating to the ability to access certain forms of land use. The two policies are very much biased towards one land use over another specific form of land use – something that Halfords strongly considers should be rectified.

7.3 Halfords are very much alive to the fact that they must be flexible and adapt their retail model to changes within the property market. This is something that they are actively pursuing as a retailer, however the tone of the two policies is stacked against them.

7.4 The changes proposed to policies SD8 and H1 will continue to promote the redevelopment of sites, including that incorporating high-density residential development, but not in a manner which effectively promotes the demise of the retail warehouse sector within London. Large format retailing, which is an established retail model with distinct locational and operational requirements, cannot simply be sacrificed for high-density housing in the manner proposed. There is no justification for this and the intention is at odds with national policy and the clear desire for Halfords, and other large format retailers, to continue to serve their customers within London.

User:	F&C UK Property Fund ICVC

F&C is likewise supportive of draft Policy H1 (Increasing housing supply) which, as summarised above, seeks an ambitious increase in housing supply, including within LB Havering (Table 4.1 shows 1,875 per annum, compared to a minimum target of 1,170 per annum in the current London Plan 2016). F&C is also encouraged by and welcomes the identification in part B 2) of the policy of potential sources for housing delivery, including in b) the redevelopment of car parks and low-density retail parks. Other sources of capacity that our client endorses are referred to in B 2) a) and c) respectively as being housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses, and sites with existing or planned public transport access levels (PTALs) 3-6.

User: Unknown

Policy H1 (increasing housing supply) commences with a reference to table 4.1 that sets out the housing targets for each Borough and an insistence that Boroughs must plan for these targets in their Development Plan documents. This follows the principles of earlier versions of the London Plan, but the table proposes a significant uplift in housing targets, a point that is illustrated in the table below:

Table 1: Total annualised London Plan housing delivery targets 2004-2019

	2004	2008	2011	2016	2019	% increase since 2004
Bromley	570	485	500	641	1424	250%
Havering	350	535	970	1170	1875	536%

Source: London Plan 2004, 2008, 2011, 2016, Draft London Plan 2017

Evidently, the largest jump in housing targets for Bromley is between the current adopted London Plan and the DLP, being a 222% increase within 3 years. For Havering, at 160%, this is the second largest leap. As the table demonstrates, the uplift in housing targets for Havering since the publication of the first London Plan in 2004 is a substantial 536%.

8. The status of Development Plans for each London Borough will have a bearing on the deliverability of the DLP housing targets. In the case of Bromley, their Examination in Public took place between 4th and 14th December 2017. The Plan includes a housing target of 641 new homes per year. In the case of Havering, they are due to submit their Plan in March 2018. Their proposed submission contains a housing target of 1,170 new homes per year. It is noted these housing targets reflect the current adopted London Plan targets, whilst in the case of Havering, they also acknowledge that their Plan fails to provide a housing land supply that reflects this published level of need. Havering has also been the subject of significant historic underdelivery over the last seven years. Together with Bromley, these are just two examples where a proposed Borough plan is likely to become adopted shortly before the new London Plan is adopted. The implication being that these Boroughs will not have provided suitable land to meet the significant uplift in housing need set out in the forthcoming London Plan, with this remaining the case for the first few years of the new London Plan.

9. Our view is that, given the significant uplift in housing targets, this must be a material factor in the deliverability of the London Plan, and if it is not, CBRE would be interested to know what the Mayor's expectations are of those Boroughs that have recently adopted plans in place. We consider it is arguable that paragraph 49 of the NPPF would render these new plans out of date.

10. The above implications for these new housing targets would also extend to the Boroughs with older plans in place. A limited perusal of documents online revealed that 31 out of the 33 London Boroughs claim to have a current five-year housing land supply (5YHLS). Upon adoption of the DLP housing targets it is quite possible that only 12 out of the 33 London Boroughs would be able to claim a 5YHLS, just by crudely comparing current housing supply against the proposed targets. This comparison is conservative and does not take account of any buffers, or historic under-delivery, which is likely to result in more Boroughs failing to be able to claim a 5YHLS.

11. CBRE would welcome clarification on the impact that the proposed housing targets will have on the status and validity of Development Plans within the London Boroughs.

12. Part D of policy H1 requires Boroughs to publish annual housing trajectories based on the targets in table 4.1 of the DLP, whilst they should work with the Mayor to resolve any anticipated shortfalls. As is illustrated in table 2 above, we anticipate significant shortfalls in most of the Boroughs upon adoption of the London Plan should these ambitious targets be accepted by the Planning Inspector. We do not consider that those London Boroughs that are subject to significant increases in housing targets are likely to accept them.

User: Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living

H1 (144) - Increasing Housing Supply

While an increase in targets for housing delivery overall is supported, these targets should be realistically achievable and measured in line with a common methodology nationally. The Mayor has carried out a London Wide Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA). The SHMA claims to cover need for all housing typologies including housing for older people which is included within the overall Objectively Assessed Need (OAN) of 66,000 additional home per year.

The DLP assessment of OAN is inconsistent with both the currently advised methodology within the NPPF and the Government's proposed methodology. This approach sets up a likely inconsistency in approach with neighbouring Local Authorities to London.

The DLP sets out that Boroughs are no longer required to prepare their own individual SHMA but must plan for and seek to deliver the targets set out within the DLP. In general, the DLP sets out more emphasis on the importance of the delivery of significantly increased levels of retirement housing across the plan period.

H1's annual housing trajectory requirement (D of policy) should be updated in respect of specialist housing for the elderly as well as overall housing and split by tenure of provision.

To meaningfully increase the supply of older peoples' housing policy H1 should include reference to the provision of these forms of accommodation housing as a source of overall supply.

Future public transport accessibility housing densities need to be carefully considered in light of likelihood/chances of improvements coming into being, expectations of landowners in terms of land value.

The HBF representation deals with the issues raised in considerably more detail and are supported.

This policy is supported in principle but subject to the necessary amendments as set out in this representation and that of the HBF.

User: Tesco Stores Ltd

2. Housing Delivery

This section of these representations make the following points:

1. Tesco support the ambition to deliver significantly more homes in London than have been delivered in the recent past;

2. However, there is a potentially significant shortfall in housing supply identified by the Draft London Plan;

3. As major landholder, Tesco has a number of assets that could contribute in the region of 10,000 new homes, which represents a significant source of housing supply, provided the Draft London Plan encourages rather than constrains redevelopment.

2.1. In his recently published Draft Housing Strategy the Mayor made it clear that *"London's housing crisis is the single biggest barrier to prosperity, growth, and fairness facing Londoner's today."1 Tesco concur and welcome the recognition given in the Draft London Plan that solving the housing crisis will require a significant increase in the rate of housing delivery.*

2.2. The Draft London Plan refers to an overall need for 66,000 homes per year for at least 20 years. This figure is informed by the 2017 SHMA carried by the GLA 2. The methods used to estimate London's housing requirements in the 2017 SHMA closely follow those used in the 2013 SHMA. The 2013 SHMA was carried out before government had provided its guidance through the NPPG in 2014 and before the recent consultation on a standardised methodology for assessing need3. At the time of writing the Governments conclusions on its proposed standard methodology are not yet known. However, Tesco support a consistent approach to assessing housing need to ensure that housing is properly planned for locally, regionally and nationally.

2.3. The Draft London Plan sets a London-wide housing target of circa 66,000 new homes a year, which is a significant increase over the current target of 42,000. Historically, delivery has consistently fallen behind the targets. Completions reached a high point in 2015/16 when circa 39,000 homes were completed4. Whilst in the previous year completions were closer to 32,0005. This position is hugely ambitious and in order to achieve such a significant increase in the rate of housing delivery it is essential that the Draft London Plan encourages rather than constrains development, and Tesco can contribute much toward addressing this issue.

2.4. With a potentially significant shortfall in housing supply, the Draft London Plan must identify every source of housing and ensure that these can be delivered. As a major landholder in London, Tesco is able to contribute to Good Growth through optimising its assets with mixeduse redevelopment including the provision of housing. It has identified through earlier SHLAA submissions a number of freehold and leasehold opportunities, which can be realised for housing. These assets could deliver in the region of 10,000 new homes. If realised, this could be a significant source of housing supply. However, Tesco have identified two major areas of concern, where the provisions of the Draft London Plan, as drafted will constrain the development of its assets and prevent the delivery of these homes: viability and car parking.

2.5. In order to further encourage the development of Tesco's assets we recommend the following changes to policy CD8 para A 4) and policy H1 B 2) b) so that supermarkets are specifically identified as a residential development opportunity.

SD8 para A 4

*4) realising the full potential of existing out of centre retail and leisure parks, **and supermarkets** to deliver housing intensification through redevelopment and ensure such locations become more sustainable in transport terms, by securing improvements to public transport, cycling and walking. This should not result in a net increase in retail or leisure floorspace in an out-ofcentre location having regard to parts A(1), (2) and (3) above*

H1 para B 2) b)

*b) mixed-use redevelopment of car parks, **supermarkets** and low-density retail parks*

User: Urbanissta

Relationship with the London Boroughs

The Replacement London Plan goes beyond a strategic planning document to seek to take control of some of the functions of the London Authorities, potentially removing the requirement for an Authority to prepare their own Part 1 Plans. This goes beyond the remit of the function of the London Plan. Local Boroughs have a Duty to Co-operate and where the Mayor does not need to meet the Duty to Co-operate, if the powers are being taken by the GLA then the Mayor must perform the function of the Duty to Co-operate.

There is concern regarding the way the London SHLAA exempts Local Authorities from undertaking their own SHLAA and SHMAs. The application of the approach of the SHLAA cannot be considered the same between Richmond and Waltham Forest for example and as such the London SHLAA should be used to inform more detailed site specific Borough SHLAAs.

User: Urbanissta

Policy H1 Increasing Housing Supply

Policy H1 sets a ten-year target for net housing completions which each local authority should plan for.

Comment: There should be a provision within this policy which requires the review of 65,000 target if it cannot be met.

User:	London Borough of Camden

The Council supports Policy H1, which is consistent with the approach of the Camden Local Plan 2017, and the housing target for the Borough included in the Local Plan.

We note that in Policy H1, Criterion C (1) (c) indicates that the boroughs should enable the delivery of the housing capacity identified in Opportunity Areas. As stated above, the Council is concerned that Policy SD5 as currently drafted will prevent the anticipated level of housing delivery at the Euston and the King's Cross Opportunity Areas, and could also harm the ability of LB Camden to deliver the 1,086 homes per year envisaged by the London Plan Table 4.1

User: Dylon2 & Relta Ltd

Housing Need and Requirement

The draft new London Plan sets out a 10 year housing target over the period 2019/20 to 2028/29 of 649,350 new homes, equivalent to an annualised average of 64,935 net additional dwellings (Policy H1 and Table 4.1). This c.65,000 dwellings per annum target is significantly above the equivalent contained within the existing London Plan of c.42,000 dwellings per annum. In this context the scale of ambition to significantly boost housing supply across London is broadly supported. It is fundamental that the new London Plan seeks to increase the delivery of new homes in the capital, and the increased targets will be an important component of ensuring London's Boroughs plan for housing positively .

Notwithstanding this support, on behalf of Dylon2 Ltd and Relta Limited we note the following points:

1) The target of c.65,000 dwellings per annum still falls short of the London SHMA's calculated housing need of 66,000 dwellings per annum (660,000 over the 10 years). The target is-much like its predecessor of 42,000 dwellings per annum - aligned to a notional capacity-based housing number, rather than housing needs. No effort appears to be being made to bridge the gap of c.10,000 homes (if using the GLA's own evidence).

2) The conclusions within the London SHMA (2017) underplay housing needs as the methodology employed is inconsistent with Government guidance:

a. The GLA is unilaterally using its own demographic projections as the starting point, showing lower (for London) growth than the Office for National Statistics (ONS) equivalents which are utilised nationally for plan making . This introduces an inconsistency with the assumptions on migration that have been and will be adopted in the remainder of the South East and will most likely lead to unsatisfactory levels of unmet need.

b. The London SHMA also fails to fully reflect the scale of housing affordability pressures facing the area. The National Planning Policy Framework (NPPF) (para 17 bullet 3) sets out that plans should take account of market signals, and national Planning Practice Guidance (ID: 2a-020) sets out how plan makers should respond to market signals (for both market and affordable housing). The London SHMA does not follow such an approach and does not consider whether the single uplift it does apply (for addressing the backlog of housing needs) could be expected to actually improve affordability in London.

3) The scale of likely underestimate of the true level of housing need is further highlighted when the proposed target of c.65,000 is compared against the proposed Standard Method for assessing housing needs set out in the Government's *'Planning for the right homes in the right places'* consultation. If applied to London, the proposed standard methodology identifies needs as c.72,400 dwellings per annum, once the method's proposed capping mechanism is applied - this caps uplifts to 40% above either up-to-date local plans or household projections. Without any capping the need for homes in London would rise to c.95,000 dwellings per annum.

Despite the draft target not meeting assessed housing needs, limited justification is given for why the proposed targets is appropriate at c.65,000 dwellings per annum, beyond simply that they are the product of a capacity-based exercise and reflect what the GLA anticipates might be achievable within the confines of the capacity assessment that has been undertaken (see Section 3.0 below) . Indeed, there is no balancing exercise of the type envisaged by paragraph 14 of the NPPF: *to meet housing needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.*

The absence of this key consideration is perhaps best highlighted by the draft new London Plan's accompanying Integrated Impact Assessment (IIA). The IIA does not appear to assess any alternative housing targets; even the strategic policy options around *'delivering the homes Londoners need'* each focus on what type of housing is delivered and how, rather than overall amounts . Furthermore, the IIA's assessment of Policy H1 -a policy which does not seek to meet identified housing needs on the GLA's own evidence- appraises the policy as having long term 'Significant Positive' (++) effects (the most positive rating) against a housing objective of meeting housing need.

Dylon2 Ltd and Relta Ltd's broad support for the overall ambition is, therefore, qualified with the concern that collectively, these shortcomings could add up to the new London Plan continuing not to effectively address the housing problem across London, nor ensuring delivery of the homes where they are needed within individual boroughs.

By way of example, LB Bromley's draft target is set at 1,424 dwellings per annum, whilst the Government's proposed standard method indicates a housing need figure of 2,564 dwellings per annum. This is a significant difference. A difference which is not justified when weight is given to the 2016-based GLA demographic projections which estimate household growth in Bromley of 1,670 dwellings per annum over 2019-2029 .Both of these figures show that need is likely to be higher in Bromley than is being planned for by the draft London Plan target, much the same as across London.

If London boroughs can sustainably augment their housing requirements to close the gap with local needs through their local plans, then they should. The London Plan should require boroughs to do so.

In this context, whilst Dylon2 Ltd and Relta Ltd are broadly supportive of the scale of growth being proposed, they consider that the housing requirements should be explicitly identified as minimum annual targets , with individual London boroughs required to seek to plan to exceed them through their own local plans, by undertaking the balancing exercise envisaged in the NPPF between local needs and potential housing supply from different sources in their areas.

Housing Delivery

Past rates of delivery

The draft London Plan is planning for the delivery of 64,935 dwellings per annum, commencing in 2019/20 . Based on past trends in housing delivery in London, this is clearly a very tall order to fulfil.

First, housing delivery in London has not exceeded 60,000 dwellings per annum since the late 1930's. This rate pre-dates the planning system and more importantly the introduction of policies to protect the Metropolitan Green Belt. There is no GLA evidence to suggest that c.65,000 dwellings per annum can be delivered in London in line with planning policy and within the confines of the Green Belt, particularly as it. has never been achieved before, and even more particularly the draft London Plan does not allow for the alteration of Green Belt boundaries.

Policy G2 clearly states that de-designation of Green Belt land will not be supported . Policy G3 does not allow for any alterations to the boundary of Metropolitan Open Land (MOL), unless through the local plan process, in consultation with the Mayor and adjoining boroughs. The Green Belt alone makes up 22% of London's land area and this, combined with the additional area of designated MOL, is a substantial barrier to meeting housing need.

Lapses of permissions

Second, to achieve this rate of delivery means that all London boroughs need and therefore should, be seeking to deliver this target starting in just over a year's time, from the 1st April 2019.

The London-specific research, commissioned by London First from Grant Thornton, - *'Fixing the Housing Crisis: Performance Indicators '* (January 2018) shows average annual completions are c.40% lower than annual permissions granted. We accept that this is not a perfect measure as it does not track the outcome of specific applications, nevertheless it confirms other data including the Mayor's *'Barriers to Housing Delivery- Update' (July 2014)* which looked at sites of 20 dwellings or more and found that only circa half of the total number of dwellings granted planning permission every year are built.

While the reasons permissions are not implemented are manifold this alone points to an irrefutable need to increase the number of permissions granted, starting now. The failure to do so will only lead to an ever-increasing undersupply of new homes to meet need, however assessed.

The draft London Plan is proposing average completions of circa double what has been achieved in recent years, a significant increase in permissions to deliver the required boost in supply will be required to meet this target taking account of the reality that a significant proportion of permissions will not materialise into a start on-site.

These applications to deliver the permissions need to be coming forward now if the requirement to significantly increase supply from April 2019 is to be in any way met. However, applications submitted now are currently being assessed against the extant targets and may not be approved because the policies intended to bring the schemes to fruition (e.g. H1 and H2) are only in draft.

Mechanisms for under delivery

Finally, there is no mechanism set through the draft London Plan which would respond to the very real prospect of London failing to deliver c.65,000 dwellings per annum, starting in 2019.

The absence of such a mechanism is an important issue. As it stands, London is not planning to meet its own concluded objectively assessed need (OAN); therefore, even if the supply projections are 100% accurate , the draft Plan is already failing to plan for unmet needs of c.10,000 over the ten year period. These needs are unlikely to be met in the neighbouring councils which are already struggling to meet their own housing needs and consequently any further undersupply in London means even more needs will go unmet.

NPPF paragraph 14 requires LPAs, in plan making, to positively seek opportunities to meet the development needs of their area, with sufficient flexibility to adapt to rapid change, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. As set out above, the draft London Plan's policy approach has not been based on any balancing exercise of the type envisaged by paragraph 14. We consider this is a failure that needs to be addressed before adoption of the new London Plan.

Furthermore, there is no incentive for boroughs significantly constrained by Green Belt or MOL, such as Bromley, to do any more than the minimum in terms of housing delivery because there is no penalty, policy review or policy change triggered in the draft London Plan when boroughs fail to meet the minimum housing target , let alone the objectively assessed housing needs, including affordable housing needs.

If a constrained borough cannot show a five year supply of housing land because it has failed to approve and/or allocate sufficient land to meet the draft London Plan's housing target, triggering paragraph 49 of the NPPF, as it stands not only will it not be required to grant planning permission for applications on Green Belt or MOL land it will not be required to review and potentially alter boundaries so as to release land which may not fulfil the purposes of such designation from within the Green Belt, and/or MOL, for housing development.

In our submission this can only lead to a perpetuation of planning by appeal. In the case of Bromley, for example, c.50% of residential completions in the last five years have been as a result of being allowed on appeal. There is nothing in place in the draft London Plan to prevent this longstanding trend being perpetuated into the future. There needs to be early, unavoidable (no tactical process delays) requirements for policy review and policy change where boroughs fail to meet the minimum annual housing target for both land allocations and permissions but also delivery.

Recommended Changes to the Plan

Reflecting on the assessment above, it is considered that the following amendments should be made to Policy H1 to ensure the policy is consistent with the NPPF and can be found sound.

(Strikethrough demonstrates a proposed deletion and bold, underlined a proposed insertion.)

H1

A. Table 4.1 sets the **minimum annual** ten-year targets for net housing completions which each local planning authority ~~should~~ **must** plan for. Boroughs must ~~include these targets~~ **test and plan to exceed these minimum targets to meet housing need in their administrative boundaries** in their Development Plan documents.

B. To ensure that ten-year housing targets are achieved:

1) boroughs should prepare delivery-focused Development Plans which:

a. allocate an appropriate range and number of sites that are suitable for residential and mixed-use development and intensification

b. encourage development on other appropriate windfall sites not identified in Development Plans through the Plan period, especially from the sources of supply listed in B2

c. enable the delivery of housing capacity identified in Opportunity Areas, working closely with the GLA.

2) boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity:

a. sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m of a Tube station, rail station or town centre boundary [35]

b. mixed-use redevelopment of car parks and low-density retail parks

c. housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses

d. the redevelopment of surplus utilities and public sector owned sites

e. small housing sites (see Policy H2 Small sites)

f. industrial sites that have been identified through the processes set out in Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function.

C. Boroughs should proactively use brownfield registers and permission in principle to increase planning certainty for those wishing to build new homes.

D. Boroughs should publish and annually update housing trajectories based on the targets in Table 4.1 which identify the sources of housing capacity (including windfall) expected to contribute towards achieving housing targets and should work with the Mayor to resolve any anticipated shortfalls. **If the London Plan fails to meet its minimum annual housing target (as set out in Table 4.1) as at** 31st **March 2021, an immediate review of the London Plan will be triggered. If individual London boroughs do not meet their minimum annual housing target for two consecutive years to** 31st **March 2021, an immediate review of their Local Plans will be triggered to explore the constraints to meeting the minimum target and to address them.**

E. Where new sustainable transport infrastructure is planned, boroughs should re-evaluate the appropriateness of land use designations and the potential to accommodate higher-density residential and mixed-use development, taking into account future public transport capacity and connectivity levels.

F. On sites that are allocated for residential and mixed-use development there is a general presumption against single use low-density retail and leisure parks. These developments should be designed to provide a mix of uses including housing on the same site in order to make the best use of land available for development.

User:	Battersea Project Land Company Limited

Policy H1 – Increasing housing supply

We support the aspiration to increase housing supply, and in particular to optimize the potential for housing on suitable and available brownfield sites.

User: The Highbury Group

1. We have concerns as to the use of the evidence base in relation to the proposed housing targets. We consider that the Strategic Housing Market Assessment (SHMA) has underestimated the annual housing requirement for the 10-year period – the estimate of 66,000 homes a year. This is mainly because the assumption of the timescale to meet the social housing backlog has been amended from the 10 year assumption in the 2008 Plan (and the 20-year assumption in the 2015 Plan) to an assumption that the backlog will only be met over 25 years. As the backlog is primarily in relation to the unmet need for low cost rented homes, this new methodology also depresses the proportion of the 10-year requirement which is for low cost rented housing. Further details of this issue are included in the technical note attached as appendix 1.

2. We have concerns that the estimate derived from the Strategic Land Availability Assessment (SHLAA) that London has a capacity for 65,000 new homes a year for the 10-year plan period is based on assumptions for increased development densities which are higher than those consistent with pre-existing plan policy on sustainable residential quality and will not provide for the range of building types and bedroom size mixes needed to meet the housing requirements assessed in the SHMA. Our primary concern is that development at the assumed densities will not provide sufficient family size homes. Further details are set out in the technical note attached as appendix 1.

3. We therefore question the basic assumption in the draft Plan, that over the next 10 years, London can meet its full housing requirements within the existing administrative London boundary. Providing the required level of new housing to meet the full range of housing requirements requires lower average development densities than assumed in the draft plan and consequently requires more development land than the quantum identified in the SHLAA. This means that a significant contribution to meeting the housing needs of the London metropolitan area, including the supply deficit within London administrative boundary, need to be met by development in the Wider South East. We welcome the draft plan’s recognition, in policies SD2 and SD3, of the relationship between London and the Wider South East. However, the Plan must be explicit as to the housing contribution required from the Wider South East. It would be helpful in this context if a SHMA and a SHLAA consistent with those completed for the Greater London administrative area, were also undertaken for the Wider South East. While this is outside the planning powers of the Mayor, it would be helpful if the report by the Examination in Public panel makes a recommendation to this effect.

User: The Highbury Group

2 Housing Requirements and Housing Supply The new SHMA sets out the housing requirements of London at 66,000 per annum. This contrasts with the two estimates in the 2014 SHMA of 49,000 pa (based on meeting the housing need backlog over 20 years) and 62,000 pa (based on meeting the backlog over 10 years, the assumption used in the 2004 and 2009 SHMAs). It should be noted that the SHMA is based on secondary data as the last London-wide housing needs survey was undertaken before the 2004 SHMA. The new SHMA, while generally applying the same methodology as the 2014 SHMA, also extends the period for meeting the backlog from 20 years to 25 years. The new SHMA concludes that 55,540 additional homes are needed each year to meet household population growth. With a total backlog of 208,621 homes needed, meeting this backlog over 25 years, produces an additional annual requirement of 8,761 giving a total requirement of 64,301. This is then adjusted to recognise the fact that some new homes are left vacant or used as second homes, to give an annual requirement of 65,878 (rounded up in the plan to 66,000). Applying a 20-year backlog clearance approach would take the annual requirement to 67,548; applying a 10 year requirement would take the requirement to 77,879. Previous government guidance was to assume backlog is met over 5 years. If this was applied to London, the annual housing requirement for the first 5 years of the plan would be 98,741, falling to 57,017 in the subsequent 5 year period on the basis that the backlog had been fully cleared in the first five years.

It can be seen from these calculations that the housing requirement is determined not just by assumptions as to population growth and an assessment of the growth in new households (which needs to assume average household size required for additional housing) but also the timescale assumed for meeting the backlog. As the plan's new supply targets are set for 10 years, there is a case for returning to the 2004 Plan assumption that the backlog be met within the plan period, which would give an annual requirement of approximately 78,000 compared with the 66,000 recently estimated. This is significant as given the annual housing target proposed is 65,000, this would increase the annual supply supply/ requirement deficit from 1,000 a year to 12,000 a year – or over the 10-year period from 10,000 households to 120,000 households. This is important in terms of the relationship between London and the Home Counties, for by suppressing the deficit, the Plan implies that London can meet, or be very close to meeting, its housing requirements within the London area, whereas a more consistent methodological approach demonstrates that this is not possible. , It is estimated that there could be an imposed exporting of about 12,000 households from London, which would impact mainly on the Home Counties districts.

The SHMA also gives bedroom size requirements:

1 bed 36,335 (55% of total)

2 bed 10,788 (16% of total)

3 bed 8,971 (14% of total)

4 bed and larger 8,783 (15% of total)

This indicates a significant shift from the 2013 SHMA, which had 1 beds as 34% of the total; 2 beds at 18%; 3 beds at 26% and 4 beds and larger at 22%. The proportionate requirement for 3 bed or larger properties appears to have fallen from 48% of the total to only 29%. This is a significant shift which is not fully explained in the SHMA.

The new housing supply target of 65,000 a year, derived from the SHLAA assumes, development at significantly higher densities than assumed in the 2014 SHLAA. In previous SHLAAs, new housing sites (i.e.: those without planning consents or without capacity estimates in Local Plans) were assessed for capacity in relation to the mid-point in the applicable density range in the London Plan. The new SHMA explicitly assumes densities towards the top of the applicable range (for example 355 dwellings per hectare (dph) in the highest range of 140-405 for schemes in the central area with PTAL of 4-6) or 65 dph in the lowest range of 35-75 for schemes with PTAL of 0-1 in suburban areas. It then assumes a further uplift to top of the applicable range in town centres and a further uplift significantly above the top of the range in Opportunity Areas. The justification given is that in practice consented schemes in Opportunity Areas have been at these density levels. In effect the SHLAA is replacing capacity estimates based on the SRQ principles by capacity estimates which reflect that in practice density policies have been breached.

So, the assumptions on which housing targets are based are in effect set to reflect practice, which has generally not accorded with policy, rather than the actual policy. This reflects the abandonment of the principles of Sustainable Residential Quality in favour of reinforcing and legitimising current trends in development. The housing targets set therefore have no regard to either the form or mix of homes to be built. The implication is that rather than increasing land supply for new housing, the targets rely on intensified use of identified land. This is in accordance with the compact city assumption – that London’s housing needs can be met through intensification without any use of green belt land or reliance on any contribution from districts outside the London administrative boundary. It is significant that the SHLAA has no quantification of the hectarage of the housing sites identified relative to the hectarage identified in the 2014 SHLAA.

User: Pocket Living

Pocket strongly support the Mayor's London wide target of 66,000 new homes per annum. This demonstrates an ambitious target which will help provide a range of housing options. The objective of making effective use of brownfield land to deliver more homes in accessible locations is the best way of delivering more homes.

Pocket are concerned that a reliance on 'small sites' to deliver a significant proportion of the 66,000 homes a year may be optimistic and there is a strong likelihood that such sites will be caught in the planning process for an excessive amount of time. There may also be the potential for outer London boroughs to allow low density developments with limited affordable housing to be developed on these sites as these may be more acceptable locally.

User:	Age UK London - a charity working with older Londoners

POLICY H1: INCREASING HOUSING SUPPLY

PROPOSED POLICY AMENDMENT:
ADD reference to: To ensure that community engagement is promoted at all housing target consultation stages.

User:	Age UK London - a charity working with older Londoners

29. H1 LINK TO POLICY CHANGE Add a proposed new policy to HI Increasing Housing Supply to incorporate residential conversions in accessible locations which should be age and disability friendly. Not to do so is to exclude a valuable resource, and the importance of refurbished dwellings as age friendly and disability friendly homes should not be under-emphasised.

30. H1 LINK TO POLICY CHANGE Add H1 (B) d Ensure that community engagement is promoted at all stages. There is evidence that lack of engagement and consultation will interfere with the Mayor's wish for an inclusive city: "When urban development is driven by market led imperatives and does not involve older people in the planning process this can lead to their social exclusion" (Handler 2014 cited by A Tinker and J Ginn 'How far has London come as an Age Friendly City?').

User: Mrs Alona Sheridan

I welcome the overarching policy GG2 concerning making the best use of land. This should be strengthened by reference in policy H1 to making use of excessive or redundant road space.
Proposed change: Policy H1 B2d) should be amended to include reference to excessive or redundant road space and other car-related infrastructure so that it reads **‘the redevelopment of surplus utilities and public sector owned sites, including excessive or redundant road space.’**

User:	Blanche Cameron

We welcome the overarching policy GG2 concerning making the best use of land. This should be strengthened by reference in policy H1 to making use of excessive or redundant road space.
Proposed change: Policy H1 B2d) should be amended to include reference to excessive or redundant road space and other car-related infrastructure so that it reads **‘the redevelopment of surplus utilities and public sector owned sites, including excessive or redundant road space.’**

User: Carshalton-on-the-Hill Residents' Association

Policy H1

The 10-year housing target (939 annual average) for LB Sutton is considerably in excess of that already set out in the Sutton Local Plan. This plan has the official approval of the Government' Planning Inspector. The London Plan proposals, particularly for small sites, would place an unreasonable burden on the suburban housing which forms a very large part of this small borough. The Sutton Local Plan target of 427 homes per year, with 35% affordable should be the amended figure.

User:	Regeneration X

4.1.2 '*For the purpose of the Plan London is considered as single housing market area*.' This statement shows that whoever has written the policy does not understand London. London is not a single housing market area. Most people already living in London are not ambivalent as to where they live in London – local connections means that on the whole people living in, say, south east London do not move to north west London. On the whole people moving into London from the rest of the UK or from overseas tend to settle in Zones 1 or 2; they rarely look to outer London. This lack of understanding of how London works means that the whole plan is invalid and not workable.

We object to the focus on Build-to-Rent – this is dependent on continuing rent subsidies and is thus not sustainable.

User: Regeneration X

4.1.6 Encouraging new homes to be marketed to Londoners before they are marketed overseas is meaningless. The purchase of homes in London by anyone based overseas should be banned. London's homes should be for Londoners to live in and not be as stores of value for overseas investors. We expect the Mayor to take a very strong stand on this.

The Plan depends on local Boroughs having good quality design guides and design codes if the growth is going to be sustainable and acceptable to those already living in London. We all know that the Borough do not have, and will not have, the resources to produce these high-quality design guides and codes. We therefore submit that The Plan is undeliverable.

We also object to the idea that developments should be allowed even when they harm the existing population or environment.

The housing section of the draft London Plan seems to be been written without any regard to the public's responses to the draft Housing Strategy.

User:	David Callow

Policy H1. Increasing housing supply. I recommend that Sentence B2)d is clarified so that “public sector owned sites” will not include woodland, parks and open spaces.

User:	David Tannahill

Policy H1. Increasing housing supply. I recommend that Sentence B2)d is clarified so that “public sector owned sites” will not include woodland, parks and open spaces.

User:	Adrian Malcolm Darley

Policy H1. Increasing housing supply. I recommend that Sentence B2)d is clarified so that “public sector owned sites” will not include woodland, parks and open spaces.

User:	Joy Brown

Policy H1 Increasing housing supply. 2c: This seems to reverse much of what has happened in my local area. If recent retail development and associated car parks are to be redeveloped, then what has been built in the past three years has been a waste of money and we will be left with small shops and the need to travel outside the local area to shop. Not everyone will want/be able to access online shopping.

User:	Joy Brown
4.1.6 Londoners **must** have an opportunity to purchase new homes before they are marketed overseas. Some developers in my area have targeted the overseas market specifically, resulting in a great deal of property speculation.	

User:	Agnes Byrne

Policy H1. Increasing housing supply. I recommend that Sentence B2)d is clarified so that “public sector owned sites” will not include woodland, parks and open spaces.

User:	Alan Jacobs

Policy H1. Increasing housing supply. I recommend that Sentence B2)d is clarified so that “public sector owned sites” will not include woodland, parks and open spaces.

User:	Karl Brown

4.1.6 The need to market London homes overseas in the midst of an acknowledged housing crisis for Londoners themselves must be challenged. I understand New Zealand (?) and perhaps one other country have decided to draw a line on this practise given the scarcity and inevitable house price inflation it inevitably supports.

User:	Alan James North

Policy H1. Increasing housing supply. I recommend that Sentence B2)d is clarified so that “public sector owned sites” will not include woodland, parks and open spaces.

User: Pat Turnbull

Policy H1 Increasing housing supply

A. Table 4.1 Sets the ten-year targets for net housing completions which each local planning authority should plan for. Boroughs must include these targets in their Development Plan documents **– all targets should specify tenure, basing themselves on the needs identified in 1.4.3.**

Delete the following points, all of which will lead to over-development and a negative transformation of Londoners' environment:

B …1c) enable the delivery of housing capacity identified in Opportunity Areas, working closely with the GLA.

2) boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites…

b) mixed-use redevelopment of car parks and low-density retail parks

c) housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses…

f) industrial sites (Policy E4, E5, E6, E7)…

User: Mrs R Jennings

From our understanding of the London Plan for Croydon, Croydon council needs to meet 20 year housing targets in 10 years. Croydon cound not achieve theis without urbanising semi-rural areas like Kenley. Kenley would need schools, doctors, flood/drain improvements (see flooding issues Godstone Rd/Purley centre) ets. Is there a plan for this? It would result in urbanisation of the area and a loss of trees, flora and fauna with all the physical and mental health benefits they offer everyone.

The pressure to build new houses needs to be spread throughout England, and not intensively focussed on the outskirts of London. It would be a depressing and irrevocable legacy for our young people to destroy the beauty and heritage of semi-rural areas

User: Home Builders Federation

This leads onto the central problem we have with this draft London Plan: it is overly confident about the housing capacity for each London local authority, based on hypothetical scenarios relating to the density of development. However, the Mayor cannot be certain about London's capacity, because as policy D8 demonstrates, what might be considered to be an appropriate height and density for a locality, depends on the completion of contextual studies undertaken at the local level. These studies will need to be completed as part of the Local Plan making process. Approval of tall buildings cannot be given until these contextual studies have been completed and adopted in a Local Plan. By the time these contextual studies are complete, Local Plans adopted, and permission granted, many years of the current draft London Plan period of 2019-2028 will have elapsed. The housing targets, therefore, cannot be delivered in time. Too many years will have passed, and the backlog that will accrued since 2019 will be too big. This will result in a serious shortfall against need.

This speaks to the flaw at the heart of the draft London Plan: that it is too dependent on a hypothetical land supply assessment, including some very heroic assumptions about small site supply and site yields, but the detail that is necessary to support the effective delivery of the housing targets depends on supporting contextual studies even those these studies will not be completed in time to enable 650,000 homes to be completed 2028.

The housing targets and the Mayor's brownfield assumptions are wholly unrealistic. This policy illustrates the flawed thinking behind the draft London Plan.

User: Addington Resident Association

1: **Small site expentations for Croydon** Table 6.7 of the SHLAA shows that Croydon is expected to provide substantially more housing on small sites than any other borough. The chapter shows that Croydon has in the past been more successful than others in providing development on small sites but what is now expected is unresonable and Croydon should not be penalized for their past success. The northern half of the borough is already intensively developed which means that most of the extra provision would be in the southern half. We do not beleive that there is any way that these numbers are achivable

2: **Our Local plan**. As recently as March 2016, the revised London Plan increased Croydon's housing requirements as a result of our Council set a stratigic target of 31,850 homes in 20 years. By requiring 29,490 over 10 yearsLondon is almost doubling the requirement and setting at naught all the effortthat have gone into our Local Plan, now on the point of adoption. the Inspector was very happy with what Croydon had done in the Plan as regards housing targets.

User: Matthew Robinson

H1.B.2
I suggest the following change to this policy:
Boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions only after they have been opened for consultation and public scrutiny, have been subject to a Social Impact Assessment with a favourable outcome and have been voted on by local residents.

I believe that this is essential to the London Plan's over-arching good growth principles: GG1 (Building strong and inclusivecommunities), GG2 (Making the best use of land),and GG6 (Increasing efficiency and resilience).

User: Notting Hill Housing Trust

NHHT welcome boroughs providing updated and detailed assessments of social infrastructure needs through their area based on the borough ten year housing targets as evidenced through the London –wide Strategic Housing Market Assessment.

NHHT acknowledges and supports the increase in housing completion targets and would emphasise that the demand and subsequent delivery of social infrastructure needs to be accounted for in up to date borough Regulation 123 Lists or within site allocation development plan documents. NHH would emphasise that only in exception circumstances should unallocated sites be required to provide on-site social infrastructure or pay additional financial contributions towards social infrastructure if they are providing a minimum of 35% on site affordable housing.

The supporting text to Policy S1 Developing London's social infrastructure suggests that boroughs should prevent the loss of social infrastructure facilities and in doing so should consider the designation of a facility as an "Asset of Community Value" if put forward by the local community. NHHT supports designations of this type on the basis that consultation with the property owner and liaison with borough planning policy teams are co-ordinated to ensure that any emerging or proposed redevelopment of the area is taken into consideration. As well as transparency on the criteria used to inform the designation the right of appeal and compensation for property owners should also be made available.

User:	Fenella Barton

Increasing housing supply. I recommend that Sentence B2)d is clarified so that “public sector owned sites” will not include woodland, parks and open spaces.

User:	Joan Anne Hepworth
In policy H1 sentence B2)d public sector owned sites should not include woodland, parks or open spaces.	

User: Gail Waldman

3 APPROACH TO COMMUNITIES

3A - **infrastructure, services, jobs to be in place before transfer of people to new housing**

3A.1 There is a need to develop a set of criteria that satisfies community values and social justice and which is measurable.

3B - **keeping communities intact with regeneration**

3B.1 Rather than dispersing them, there should be a presumption in favour of keeping communities intact.

User:	William Lucy

Policy H1 Increasing housing supply **Recommend** that Sentence B2)d is clarified so that “public sector owned sites” will not include woodland, parks and open spaces.

User: Tonbridge and Malling Borough Council

While acknowledging the methodological approach adopted by the GLA in preparing the Strategic Housing Market Assessment is different to that used in Tonbridge and Malling and the rest of the Kent Districts, the objectively assessed housing need for Greater London for the first ten years of the London Plan to 2029 is estimated to be 66,000 net new dwellings per year. The draft Plan asserts that most of this need (65,000 per annum) can be delivered within the Greater London area, which is welcomed, although the levels of delivery, particularly in the outer boroughs is considered to be ambitious given current rates of delivery.

However, assuming the Plan target can be met there is an accepted unmet need of 1,000 dwellings per year. The Plan argues that this will be accommodated by working with willing partners beyond the Greater London boundary, but no further detail is provided. Presumably, this will be addressed before the Plan is subject to examination later this year in order to satisfy the London Plan Inspector?

By the time the Plan is expected to be at examination in the autumn, it is very likely that the revised National Planning Policy Framework (NPPF) will be relaunched, introducing the proposed standardised methodology for assessing housing need in Local Plans. Although the London Plan will be allowed to proceed with the current assessments, assuming it will have been submitted to the Secretary of State before the NPPF is published, this may not be the case for the willing partner authorities in the wider south east.

In Tonbridge and Malling for example the uplift would represent a 23% increase or an additional 159 units per year on top of an already challenging target of 696. Evidence prepared to support our emerging Local Plan suggests delivery at these levels is unsustainable and Tonbridge and Malling has a good track record of delivery despite being over 70% Green Belt. Consequently, it is anticipated that we will be planning for some unmet need.

Therefore, if the uplift in housing need is as proposed in the recent consultation ‘Building the right homes in the right places’ it would seem unlikely that any local authorities in the wider south east would have the capacity to consider taking unmet need from their neighbours in the same Housing Market Area, let alone from Greater London. This would imply a significant risk to demonstrating the deliverability of the Plan.

In view of the fact that in reality there may be more than 1,000 dwellings of unmet need in London

(i.e. to achieve this would require a considerable increase on current delivery rates, representing almost a doubling of annual completions, which would be concentrated in the outer London Boroughs) this risk could increase.

Since the draft London Plan only includes housing targets to 2029 implying an early review of the housing needs and delivery, this will inevitably have to incorporate the new standardised methodology soon to be introduced by the NPPF. This, as currently proposed, would have the effect of increasing London's need by another 6,000 dwellings per year.

So while the commitment to meet the majority of future housing need within Greater London is welcomed, the risks of an increasingly significant level of unmet need will need to be addressed urgently as part of the London Plan process. The consequences of sustained under delivery will be pressure on increased outward migration and rising house prices, which will counteract the efforts of all local authorities in the wider south east to meet their own needs and importantly increase the availability of more affordable housing.

User: Cllr Caroline Newton

The housing target has been increased nearly three-fold, from 446 units a year to 1,245 but with NO additional infrastructure promised. Bexley does not have any underground tube stations or DLR. Its bus network is not as developed as other parts of London (no connections direct to central London and poor night services). There is also no additional funding allocated for public amenities such as schools, GP surgeries or hospitals. Such a huge demand in the increase in “contribution” to the housing solution, with a removal of checks and balances which would consider the impact on the community, simply cannot be demanded by the Mayor without first implementing a massive step change in our transport, school and healthcare capacity.

The amount of housing coming from small sites has increased eight-fold from around 110 sites to 865, the highest increase as a percentage of total supply in London. These small sites will be predominantly in residential areas up to 800m from town centre boundaries and railway stations which in Bexley will include areas with relatively poor accessibility

User: Cllr Caroline Newton

The plan restricts building on underused industrial areas. Bexley has identified some of these areas for new housing. The industrial areas simply will never be brought back into use as they have been used in the past. These are prime areas for residential development, mixed with some light industry/business use. The plan is confused over whether the Mayor wants housing for commuters (the suggestion of over-densification around train stations) or whether industrial land should be brought back into use for jobs (in which case the Mayor needs to develop, with local Councils, plans for business development areas, not focus on housing).

The removal of the ban on back land development will see residential provision packed tight, and with a presumption in favour of small housing developments (up to 25 units) this will end up with the loss of green space. Towns in Bexley originated around railway stations – the family homes that were built in the 1930s are close to town centres and the railways. GLA planners believe that small flats, converted from three bedroom semi detached houses, are suitable family homes. This means streets and streets of semi-detached housing can be converted into – or knocked down and built on for – flats. One street I am Councillor for has seen applications (rejected) for such conversions – meaning the number of dwellings would increase from c170 (approx. 500 to 600 residents) to between 300 to potentially 1000 or more dwellings.

User: Mr Graeme Fraser-Watson

1. Housing Targets
   The housing targets for Richmond are, in my view, not practical without seriously encroaching on green space (despite the plans proposals to protect these) and / or significantly reducing the quality of the environment and doing long term damage to the borough in which we live.

User: CBI

CBI members commend the Mayor of London’s recognition that to meet future demand, London will need 66,000 new homes every single year. London’s future housing supply will be a key determinant of businesses’ ability to recruit and retain talent in the future. To this end, businesses support the Mayor of London’s aim to increase housing supply and deliver more affordable homes for Londoners. Furthermore, proposals setting targets for local authorities to identify sites for housing, and the guidance aimed at supporting Small and Medium-Sized Enterprises’ (SMEs) delivery of housing are welcome. However, further clarity is needed on how the Mayor of London aims to work with local authorities to ensure housing density is increased in every borough across London. A continued focus on unlocking public sector land and other brownfield sites for development will be required to help ensure London’s housing potential is maximised.

User: London Forum of Amenity and Civic Societies

Neutral - Policy SD7 B suggests "reassessing town centre boundaries" and refers to Policy SD8 Town centres. It must be made clear that when assessing the 800m walking distance from a town centre for assessing density of new development, the distance should be from the development site to the primary frontages with the town centre, not its edge.

It is noted that Policy SD7 C uses the correct term for a borough plan: "Local Plan". In other parts of this New London Plan the term "development plan" is used and all of those should be changed to "Local Plan" which is the definition of the Government and is understood by communities, businesses and developers.

Add to SD7 D 'The impact of these types of centre and of major shopping centres should be assessed and monitored for their effect on other town centres and their viability and offer.'

Figure 2.17 for town centre locations should be accessible by a link to the GLA web site to a high resolution image of it that can be zoomed to see detail at a local level.

In **paragraph 2.7.3** after the words "town centre boundaries" should be added the words 'and in liaison with adjoining local authorities on the basis of Duty to Cooperate.'

In **paragraph 2.7.4** the words "These centres" should be clarified for the ones to which the text then refers.

Paragraph 2.7.4 states that "a clear strategy should be developed" for "retail parks, dominated by large format stores and heavily reliant on travel by car" which often have large surface car parks. That is important and **should be part of Policy SD7**.

Policies SD7 and SD8 should make clear that in town centre development the small local service and business uses in the 'back streets' should be protected and enhanced and their rental costs and business rates should be kept at levels they can afford.

User: Hertfordshire County Council

Housing

4.1.3 To achieve these housing targets the overall average rate of **housing delivery** on both large and small sites will need to approximately double compared to current average completion rates. The Mayor recognises that development of this scale will require not just an increase in the number of homes approved but also a fundamental transformation in how new homes are delivered. The London Plan, London Housing Strategy and Mayor's Transport Strategy together provide a framework to help achieve this ambition but achieving this step change in delivery will require increased levels of funding to support the delivery of housing and infrastructure, which is discussed in more detail in Chapter 11. The Mayor also appreciates that given the scale of the ambition there is a risk that this step change will not happen to the extent of the ambition and with necessary speed. This is why he is putting in place mechanisms to monitor and manage housing delivery and if necessary Review the London Plan within Chapter 12.

User: L&Q

3. The social, economic and environmental consequences of not meeting the housing crisis should be clearly set out in the London Plan - The draft London Plan recognises that there is a ‘housing crisis’. However, it does not set out the implications for London and Londoners if this crisis is not addressed. This could be described as a ‘Bad Growth’ scenario. The draft London Plan should contain a concise summary which can be straightforwardly understood by Londoners4 . This explanation should be set out firstly so that it can be readily understood by Londoners and secondly so that it can be straightforwardly cited as guidance for decision-makers.

7. The scale of the ‘housing crisis’ requires the managed release of protected land within London for new homes

8 – In view of the above concerns regarding housing need, supply and delivery it is clear that the London Plan must conduct a housing delivery review to consider additional sources of supply. This review should include:

? the potential release for development for new homes of appropriate and sustainable land in the Green Belt or Metropolitan Open Land, particularly in areas where new transport infrastructure is being developed, whilst protecting land of higher ecological or agricultural value;

? the release of more land for new homes at appropriate industrial sites, especially where: o this land is set to benefit from ‘step change’ events such as Crossrail 2, development at Heathrow, the Bakerloo line extension and DLR extensions; and/or o where it can be demonstrated that proposals can deliver an appropriate living environment and will not prejudice the long-term functionality of the employment land. The London Plan must also provide a clear explanation of:

? how the Mayor intends to update or review the minimum housing targets beyond 2028/29;

? the targets London Boroughs should refer to in preparing their own development plan documents, as these must identify housing supply beyond 2028/29; and

? the circumstances (e.g. a failure to achieve delivery targets) that will trigger an early review of the Plan – this should be based on achievement against Key Performance Indicators to be set out in Table 12.1 of the Plan.

As things stand the insufficient supply of land for new housing constrains delivery and reduces the affordability of build for sale or build for rent housing. It also increases land values, with the lack of supply raising the market cost of land available for development for new homes. This is notwithstanding the attentions of the Mayor to influence the price of land through planning policy.

User: Keith Saunders

The importànce of trees and woodlands cannot be emphasised enough. They improve air quality, provide vital habitat for wildlife, much of which is disappearing from urban areas and aesthetically they help to brea? up views of endless buildings. Also, people feel better and more relaxed in wooded areas. I work as a conservation volunteer and any time spent in woodland makes me feel better in myself.

In the sections listed below (in the same order as they appear in the draft London Plan):

- Paragraph 1.3.3. Recommend an addition (in CAPS) to the following sentence: “Access to green and open spaces, including waterways AND TREES, can improve health, but access varies widely across the city.”
- Paragraph 3.9.5. I support the inclusion of “Protection for trees” as an issue in the amplification of potential negative impacts of large-scale basement development beneath existing buildings.
- Policy H1. Increasing housing supply. I recommend that Sentence B2)d is clarified so that “public sector owned sites” will not include woodland, parks and open spaces.
- Paragraph 4.2.9. I support the principle of “no net loss of overall green cover” as a result of small housing developments, and support “off-site provision such as new street trees” in order to achieve this principle. I recommend an addition (in CAPS) to the following sentence: "Loss of existing biodiversity OR GREEN SPACE, as a result of small housing developments, should be mitigated through measures such as the installation of green roofs, the provision of landscaping that facilitates sustainable urban drainage, or off-site provision such as new street trees in order to achieve the principle of no net loss of overall green cover. Rainwater attenuation features should be incorporated to achieve greenfield run off rates. LOSS OF ANY PUBLIC GREEN SPACE WILL BE COMPENSATED FOR WITH ALTERNATIVE ACCESSIBLE SITES.”
- Policy S4. Play and informal recreation. I support section B2)d, that residential development proposals for schemes that are likely to be used by children and young people should incorporate good-quality, accessible play provision for all ages, of at least 10 square metres per child that: “incorporates trees and/or other forms of greenery”.
- Policy G1. Green infrastructure. I support this policy, and subsequent narrative that mentions the important role of trees.
- Policy G5. Urban greening. I support this policy, including the recommended Urban Green Space Factor, and subsequent narrative that mentions the important role of trees. I support the inclusion of the role and weighting for woodland and trees in Table 8.2 - Urban Greening Factors. I recommend including a reference to Residential Development and Trees (Woodland Trust, 2015, woodlandtrust.org.uk/residentialdevelopments).
- Policy G6. Biodiversity and access to nature. I support this policy. I recommend that Sites of Metropolitan Importance and all ancient woodlands are added to the categories of planning applications that must be referred to the Mayor.
- Policy G7. Trees and woodlands. I support this policy. I recommend that Section B)1 is strengthened as follows (amendments in CAPS): “GIVE THE STRONGEST POSSIBLE protectION TO ‘veteran’ trees and ancient woodland, ESPECIALLY where these are not already part of a protected site”. I support the subsequent narrative on the role of trees, particularly paragraphs 8.71 – 8.73. I recommend referring London boroughs to guidance on ancient woodland and veteran trees: Planners’ manual for ancient woodland and veteran trees(Woodland Trust, 2017, woodlandtrust.org.uk/plannersmanual).

Please accept this my formal response to the consultation. I will look forward to hearing from you as the Plan progresss.

User: BA Pension Trustees, Nationwide Pension Fund Trustee & National Grid UK Pension

In his recently published Draft Housing Strategy the Mayor made it clear that “London’s housing crisis is the single biggest barrier to prosperity, growth, and fairness facing Londoner’s today.”1 The consortium agree and welcome the significant increase in housing delivery targets aimed at addressing this concern. Release of industrial land has previously provided a steady supply of land for housing that we can ill afford to lose if London’s housing targets are to be met. It is therefore vital that the processes of intensification, co-location and substitution of industrial land set out in the Draft London Plan are effective at not only maintaining a sufficient supply of land and premises for industry buy also delivering new homes. We have suggested modifications where we consider that the industrial polices can be made more effective at achieving this (see Appendix 1).

The consortium recognise that housing delivery rates will have to increase significantly in order to meet the increased housing targets. In particular significantly increased delivery will be required in the Outer Boroughs, where a large proportion of London’s industrial land is located. The consortium are not convinced that small sites have the capacity to deliver 38% of the overall housing target. Therefore additional housing capacity will need to be identified at a local level to take up any slack. This can be achieved by positively planning for the consolidation of industrial land through the processes set out in the Draft London Plan. However, to be effective these processes rely on development coming forward on large industrial sites. The consortium are concerned that by increasing the affordable housing threshold to 50% on development that delivers housing through these processes, the Draft London Plan is constraining development where it should be encouraging it.

User: Mrs Tatiana Telles Ferreira

4.1.8 Small sites helping in housing supply

The new target of additional 65,000 homes a year, double of the current rate, expecting small and medium size housing developers to help to deliver housing supply trough densifying small/medium sites for first time (approx.24,500 new homes a year), do not rely only in big developers as previously done in London.

As above, the main question about that is how much the local character of each Borough can be preserved in a so dense environment, and how much a neighbourhood sense can be kept.

As a parallel note, AAM could consider this Small/Medium size housing market as a potential market target to the office

User:	Mrs Desmonde Child

5) I object to the housing targets for Merton. An increase of 223% could only be achieved by destroying the character of the Borough and with it, the reason why people choose to live in Outer rather than Inner London. Do you really want to transform all London Boroughs to the living standards of the most crowded with their social, health and welfare problems? Surely the aim should be the reverse.

Policy H2 Small sites

User: Mrs Caroline Scott

B. Possible redevelopment of within 800m of a railway station

This would allow for redevelopment across nearly the whole Borough, ruining the character of established communities. There need to be significant protections to prevent people selling property piecemeal and for buildings going up in their place that are out of character and which spoil the visual attractiveness of a community and neighbourhood.

I believe a protection needs to be offered to Richmond Park so that it is not affected by over-development. I believe that there should be a protective ring around the Park boundary of500 m within which development over a certain height can not take place, and that development within this boundary should stay in keeping with the predominant character of the area.

User: Ickenham Residents' Association

The proposals to allow new homes to be built within the curtilage of an existing house (garden grabbing) is strongly opposed. Most of the suburban village of Ickenham is located within 800 of a station and as such, would fall foul of policy H2(D). The intense densification that this policy provides for would fundamentally change the established character of the historic village of Ickenham and would also no doubt make our local flooding issues worse. We are a garden friendly village and the prospect of essentially issuing a licence to build on all the back gardens in Ickenham east of the river Pinn is strongly opposed. Policy H2(D) is also clearly in conflict with national policy on garden grabbing and in conflict with the Mayor's aims of a greener city. It should be deleted.

User:	Dr Jessica Ferm
Use of term ‘underused’ in **Policy H2 on Small Sites** open to interpretation, making non-designated industrial sites particularly vulnerable. In fact, an assessment of the proportion of ‘small sites’ currently identified within housing capacity calculations that are currently ‘non-designated industrial	

User:	Ruth Blair

To facilitate the housing targets, there is to be presumption in favour of small housing schemes (between 1 and 25 homes) on sites that are within 800 meters of a Tube Station (i.e. more than half of London) regardless of whether the proposal involves the demolition of a building making a positive contribution in a Conservation Area. There is an exemption for listed buildings, but the exemption doesn’t apply to a listed building’s setting.

User: Councillor for Coulsden East Ward, LB Croydon

The removal of protection for back gardens.

The existing policy 3.5 has been successful in protecting much garden land from development. It would, therefore, be a retrograde step to now remove that protection. The loss of back gardens has a huge impact on biodiversity and local character and flies in the face of the NPPF.

Policy 3.5 should, therefore, be reinstated to maintain the current level of protection for back gardens.

User: Mr Gary Hayes

Policy H2 Small sites

2.1 While some protection for exiting social-rented homes is provided in respect of larger scale estate regeneration and demolition (Policy H1o), we are worried that social housing estates will be targeted for small scale demolition and development through this policy, resulting in on going loss of precious social-rented homes, green and play spaces. Section B(1) is of concern in this respect.

2.5 We support the inclusion in Policy H2A(4) – providing support for custom, self-build and community-led housing, but feel that the policy should be strengthened.

2.6 We propose the following:

? Policy H2 should more actively encourage custom, self-build and community-led housing – particularly where it meets social / low cost rented need;

? it should require boroughs to establish relationships / work closely with local custom, self-build and community-led housing organisations to delivery social / low cost rented homes; Leathermarket JMB being a good example of this;

? design codes should not be determined on clear measurable standards;

? the following text (in bold should be added to section F7 - social housing estates, including estate regeneration schemes, unless full consultation has been carried out and full agreement attained in line with the Mayor’s good practice guide on estate regeneration.

User: Mr Timothy Gill

This section should improve protection for children and young people’s play areas, formal and informal. Suggest the following new point in policy H2 F (exclusions):

sites that are formal play areas or where there is evidence of children’s use for informal play.

User:	Mr Ian Leonard

1. the removal of protection for back gardens (contrary to national policy),

User: Cllr Richard Chatterjee

Chapter 4 Housing

Policy H2 Small sites

B Boroughs should:

1) recognise in their Development Plans and planning decisions that local character evolves over time and will need to change in appropriate locations to accommodate additional housing

provision and increases in residential density through small housing developments.

2) prepare area-wide design codes to promote good design and to proactively encourage increased housing provision and higher residential densities on small housing developments. Design codes should provide clear guidelines and parameters for small housing developments and show how additional housing provision can be accommodated in different locations, drawing on the principles set out in this policy and Supplementary Planning Guidance provided by the GLA.

Comment:

With the removal of Table 3.2 Sustainable residential quality (SRQ) Density Matrix, no guidance is given on the amount of increase in residential densities appropriate for urban and suburban small site infills or re-developments in order to retain the character of an area.

The Croydon Local Plan CLP2 does not provide any guidance in the main document DM11 or the local ‘Place’ descriptions within DM35 although there are proposals to provided supplementary planning guidance on the ‘place’ definitions for suburban and urban redevelopments and in-fill.

Recommendation:

Guidance on the acceptable density of proposals is required for applicants and local residents in order to provide application proposals which are acceptable to the local character and local communities.

Without any guidance aggressive developers will increase densities to unacceptable levels to obtain greatest profit per site area at the expense of local character if parameters and guidance is NOT provided in the planning policies.

Reference to the specific SPG should be identified if additional guidance is contained in any SPG. What is the status of previous SPGs which have not been adopted by the planning inspectorate?

Reinstate Table 3.2 Sustainable residential quality (SRQ) Density Matrix.

Policy H2 Small sites

D To deliver the small sites targets in Table 4.2, boroughs should apply a presumption in favour of the following types of small housing development which provide between one and 25

homes:

1) infill development on vacant or underused sites

2) proposals to increase the density of existing residential homes within PTALs 3-6 or within 800m of a Tube station, rail station or town centre boundary through:

a) residential conversions

b) residential extensions

c) the demolition and redevelopment of existing buildings

d) infill development within the curtilage of a house

3) the redevelopment or upward extension of flats and non-residential buildings to provide additional housing.

Comment:

Para 2 d) identifies increasing density of existing residential homes within PTALs 3 to 6 by ‘infill development within the curtilage of a house’ indicates a presumption of acceptability which is in contradiction to the NPPF para 53 which states:

“53. Local planning authorities should consider the case for setting out policies to resist

inappropriate development of residential gardens, for example where development would

cause harm to the local area.”

Comment

The Policy para 2 d) does not respect the NPPF in setting out policies to RESIST inappropriate development on garden land.

The policy does not indicate by how much or what the limit of density increase is considered

appropriate.

Increasing the density of existing residential homes necessitates modification of existing dwellings. Does this mean subdivision of existing dwellings as HMOs?

Does this policy exclude in-fill and redevelopments at locations of PTAL 0 to 2?

Clarification is appropriate that the increase within the curtilage of a house is inappropriate at PTALs below 3 or greater than 800m of a town centre boundary.

LPAs need to define the exact location of a town centre boundary such that an 800m radius/distance can be determined.

Gardens provide the lungs for residential areas and therefore building on residential gardens in urban and suburban areas reduces the environmental benefits to the community from air oxygenation from garden foliage, trees and other vegetation which aids the reduction of local air pollution.

Recommendation:

Confirm that development on garden land within the curtilage of urban and suburban dwellings should be resisted, and, specifically, in residential areas at PTALs below 3 is considered inappropriate, to reflect the guidance in NPPF para 53.

LPAs need to define the exact location of a town centre boundary such that an 800m radius/distance from the Town boundary can be determined.

Policy H2 Small sites

E For the purposes of part D, the presumption in favour of small housing developments means approving small housing developments which are in accordance with a design code developed in accordance with part B. Where there is no such design code, the presumption means approving small housing development unless it can be demonstrated that the development would give rise to an unacceptable level of harm to residential privacy, designated heritage assets, biodiversity or a safeguarded land use that outweighs the benefits of additional housing provision.

Comment:

"… the presumption means approving small housing development unless it can be demonstrated that the development would give rise to an unacceptable level of harm to residential privacy…"

This statement does NOT give sufficient or appropriate guidance. What is the definition of

"unacceptable level of harm"?

Without definition, planning officers could not refuse an application such that it could withstand a challenge to the Planning Inspectorate.

Recommendation:

The appropriate parameters of ‘unacceptable harm’ should be defined.

User: Cllr Richard Chatterjee

Para 4.2.5 Incremental Intensification.

Incremental intensification of existing residential areas within PTALs 3-6 and within 800m of a Tube station, rail station or town centre boundary is expected to play an important role in meeting the housing targets for small sites, particularly in outer London. This can take a number of forms including new build, infill development, conversions, demolition and redevelopment or extension of existing buildings, where this results in net additional housing provision. Within these areas, there is a need for the character of some neighbourhoods to evolve to accommodate additional housing.

Therefore, the emphasis of decision-making should change from preserving what is there at the moment towards encouraging and facilitating the delivery of well-designed additional housing to meet London's needs.

Comment:

Interpretation of this policy statement indicates that Incremental Intensification is inappropriate at locations of PTAL below 3 and greater than 800m of a Tube station, rail station or town centre boundary.

Recommendation:

As para 4.2.5 does NOT include incremental intensification within urban or suburban areas with PTALs of 0 to 2 (i.e. below 3), densities at urban and suburban locations at PTAL levels below 3 should therefore retain the existing levels of density to reflect the local character.

User: Cllr Richard Chatterjee

4.2.8 Small housing developments are envisaged to be within close proximity to existing homes. These should be carefully and creatively designed to avoid an unacceptable level of harm to the amenity of surrounding properties in relation to privacy, for example through the placement and design of windows and the use of landscaping. Environmental and architectural innovation should be supported and schemes should achieve good design and ensure that existing and proposed homes benefit from satisfactory levels of daylight and sunlight. All homes must meet the housing standards in Policy D4 Housing quality and standards, including the provision of private open space.

Comment:

The reference to Policy D4 Housing Quality, does not include any parameters for small housing developments in relation to the acceptability of privacy and overlooking e.g. distance of separation between facing windows etc.

If these parameters are not defined, any proposal offered which is considered unacceptable could not be refused and subsequently withstand a challenge as there is no defined parameter by which an inappropriate proposal could be confidently refused.

These statements are all subjective and open to various interpretations and could not withstand a challenge on appeal.

Recommendation:

As Policy D4 Housing quality and standards do not provide adequate guidance or parameters to cover these issues, definition is needed of the privacy and overlooking parameters which define acceptable limits of privacy and overlooking.

User:	Mr John Davenport

The new London Plan proposes to remove protection against development in back-gardens: this change would not accord with the National Planning Policy Framework. Please therefore reinstate this protection, particularly in sensitive areas like Kenley

User: Mr Robert Wilson

Current planning laws give real importance to heritage assets. The DLP only has aspirational remarks, but these are outweighed by presumptions in favour of development of small sites. The HWCA is the core feature of HW, a uniform development round a small station. It is suburban with gardens and trees. It is entirely within 800m of the Station. The DLP must make it clear that the small site planning presumptions do not override CA Protection, which should be in line with Listed Buildings.

NEIGHBOURHOOD PLANS

These plans are the best reflection of community views. Rather than being overridden by the DLP, they should be given paramount importance within Design Codes and Local Plans - subject of course to compliance with the DLP itself.

CUMULATIVE DEVELOPMENT

The presumption for development for small sites, defined as up to 25 households (which even one would constitute a dominant development in our community), must be subject to a clear provision to protect against cumulative development (including recent development).

We have experienced major flooding problems from cumulative small developments. We are at a tipping point to lose our suburban character through excessive garden infill and loss of trees.

User:	London Parks and Gardens Trust
The Trust supports comment 4.2.9.	

User: Sean Creighton

The ‘(L)oss of existing biodiversity or green space**,** as a result of small housing developments’ is unacceptable in Para 4.2.9.

47. The ‘provision of landscaping that facilitates sustainable urban drainage’ and of ‘(R)ainwater attenuation features …. to achieve greenfield run off rates’ in Para 4.2.9 is essential, particularly in Norbury where the hills create run off and flooding problems.

48. The proposed ‘off-site provision such as new street trees in order to achieve the principle of no net loss of overall green cover’ in para 4.2.9. is not acceptable. Street trees should be provided to add to overall green cover and to help tackle air pollution.

49. Action by the Mayor is urgently needed to prevent the continued loss of tree cover, and green links along railway tracks, as a result of Network Rail’s continued cutting down of trees.

User:	Sean Creighton

As Chair of Norbury Community Land Trust I welcome the recognition in para 4.2.10 that ‘(S)mall sites can be particularly suitable for well-designed community-led housing projects’ and ‘Boroughs should support such projects where these developments are integrated with existing neighbourhoods and support mixed and inclusive communities. Croydon Council approved a report on 26 February which will support such activity in the Borough. Prior to the finalisation of the report I had a useful meeting with the Leader of the Council who had chaired the Commission on Community Led Housing, and a Commission member spoke at the Trust’s launch meeting on 19 February.

User:	Mr Drew Stevenson

I am not in favour of the presumption in favour on small sites in Conservation areas where there is not yet a design code in place.

***I suggest tha**t Policy H2E and F be amended accordingly.

User:	Cllr Andrew Stevenson

On a comparatively minor point, Para 4.2.11, referring to the amalgamation of several flats into larger homes reads like a policy, but is in the text.

*****I suggest that** similar wording is added as a new policy H2I and reads “boroughs should refuse applications for the amalgamation of separate flats into larger homes where this is leading to a significant loss of homes.”

User:	Andrea Carey Fuller

The London Plan needs to mprove protection for children and young people’s play areas, formal and informal, eg in Policies H2 Small sites C and S4 Play and informal recreation.

User: Andrea Carey Fuller

While some protection for exiting social-rented homes is provided in respect of larger scale estate regeneration and demolition (Policy H1o), we are worried that social housing estates will be targeted for small scale demolition and development through

this policy, resulting in on going loss of precious social-rented homes, green and play spaces. Section B(1) is of concern in this respect.

We support the inclusion in Policy H2A(4) – providing support for custom, self-build and community-led housing, but feel that the policy should be strengthened.

We propose the following:

- Policy H2 should more actively encourage custom, self-build and community-led housing – particularly where it meets social / low cost rented need;
- it should require boroughs to establish relationships / work closely with local custom, self-build and community-led housing organisations to delivery social / low cost rented homes; Leathermarket JMB being a good example of this;
- design codes should not be determined on clear measurable standards;
- the following text (in bold should be added to section F7 - **social housing estates, including** estate regeneration schemes**,** unless full consultation has been carried out and full agreement attained in line with the Mayor's good practice guide on estate regeneration.

User: Lendlease

The scale of the increased housing delivery that is expected from small sites is considered to be unrealistic and inconsistent with paragraph 48 of the NPPF.

The SHLAA assumes delivery of 187,900 homes over the 2019-2029 period on unidentified sites or windfall allowance. In addition to this a separate windfall allowance of 57,380 is made. This is double counting and does not accord with the methodology required in NPPF, which states that

“Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.”

According to the eight year ‘post-recession’ trend, covering the 2008/9 – 2015/16 period windfall delivery averaged 9,371 dwellings per annum or 93,710 over a projected ten year period, using a proxy to discount development of residential gardens (SHLAA, para. 6.14). The windfall allowance in the draft Plan represents a 162% increase upon this figure. Even if a longer trend period is used (2004/5 - 2015/16), excluding office to residential permitted development, but not making any reduction for development of residential gardens is made the projected delivery over the ten year period is 104,592 dwellings. The windfall allowance in the draft Plan represents a 145% increase upon this figure.

Whichever base data is used, the SHLAA assumes that previous delivery will be in the order of 2.5 times what has previously been achieved and essentially that major step change in delivery will occur from April 2019 onwards. We do not consider that the SHLAA demonstrates compelling evidence for this.
The NPPF requires “compelling evidence” that windfall sites have consistently become available in the local area “and” will continue to be a reliable source of supply. Both of these tests need to be satisfied. The policy works hand in glove with paragraph 17 which requires a “plan-led” approach and paragraph 47 which makes clear the need to “identify” specific deliverable and developable sites. The approach to small sites is not consistent with national policy and fails the test of soundness in para. 182 of the NPPF, it is also not effective as it is unclear how it will be delivered.

Overall, we are concerned that there is not sufficient evidence to demonstrate that the Plan can deliver the new homes required. The significance of this is that every effort should be made to support an uplift in the housing delivery of larger sites and housing regeneration schemes and that policies should not introduce further burdens on such sites that could make such schemes unviable and undeliverable.

User:	Kent County Council

The draft London Plan introduces an increased emphasis on delivering small sites for housing (Policy H2). The delivery of small sites is supported in so far as it will help to increase the supply of new homes. However, the development of small sites can restrict the ability to provide comprehensive infrastructure to support housing growth, as smaller sites are not always able to deliver the larger scale infrastructure required to support growth. Where development is likely to have cross boundary implications, collaboration will be vital in the delivery of small sites to ensure the delivery of necessary infrastructure.

User: Merton College and the Crown Estate

Merton / The Crown Estate consider that the strategy set out in the Draft London Plan has an over reliance on the capacity of small sites to deliver housing. The Draft London Plan attributes a significant proportion (38%) of the increase in housing delivery across London to small sites, which are essentially windfall sites. This is particularly the case for the Outer Boroughs where the proportion of the housing target attributed to small sites rises to 46.5%.

Paragraph 48 of the NPPF and Planning Practice Guidance1 states that ‘windfall’ assumptions for the projected rate of housing delivery on unidentified sites can be included in assessments of potential housing supply, providing there is ‘compelling evidence’ that such sites have consistently become available in the area and will continue to provide a reliable source. In estimating capacity on small sites the GLA has considered three approaches as set out below:

? Approach 1 - an 8 year windfall assessment based on post-recession trends
? Approach 2 - a longer term 12 year windfall assessment
? Approach 3 - a ‘modelled approach’

Based on the findings of Approach 1, over the period between the financial years 2008/9 and 2015/16, a total of 79,370 homes were delivered on small sites, which equates to 9,921 homes a year. Based on the findings of Approach 2, over the period between the financial years 2004/5 and 2015/16, a total of 129,940 homes were delivered on small sites, which equates to 10,828 homes a year. As such delivery on small sites will need to increase dramatically over current trends if the small sites target of 24,573 homes a year, as set out in Table 4.2, are to be met.

In Approach 3, the modelled approach, the GLA has examined the scope to increase current trends in housing completions on small sites as a result of policy changes proposed in the Draft London Plan, in particular Policy H2 Small sites. Once trend forecasting based on historical trends is taken into account, Approach 3 generates a dramatically different estimate to the more evidenced based Approaches 1 and 2. The projected ten year capacity estimates for each approach are set out in the table below.

Projected 10 year capacity figures	Approach 1	Approach2	Approach 3
	93,710	104,592	245,280

Policy H2 Small sites states that boroughs should apply a presumption in favour of the development of small sites for housing. This would apply to infill development and vacant underused sites and residential extensions, conversions and re-builds in areas with a PTAL over 3 or within 800m of a Tube station, rail station or town centre. It also applies to redevelopment or upward extension of flats and non-residential buildings to provide additional housing. Proposals should comply with design codes, which the policy encourages boroughs to prepare. It also states that where affordable housing requirements are applied to schemes delivering 10 units or fewer, it should be based on a tariff approach to off-site contributions.

Merton / The Crown Estate welcome the support that Policy H2 provides for developers of small sites. However, they consider that the Mayor has significantly over-estimated the impact that this policy, and the package of measures outlined in the Draft London Housing Strategy, will have. The modelled approach is a high level assessment of capacity, and whilst it does factor in conservation areas and listed buildings, it does not represent a fully evidenced local level assessment of capacity, such as is promoted elsewhere in the Draft London Plan (see Policy D2 Delivering Good Design).

Early indications are that local assessments of an area's capacity do not give rise to such high levels of capacity from windfall small sites. For example LB Newham recently consulted on its proposed Submission Draft Local Plan. As set out in the Options Appraisal document the housing delivery figures from the GLA's emerging SHLAA were taken into account, as well as a detailed borough-wide Character Study. Taking into account the Character Study, Newham gave an estimate of just 1,500 homes from windfall small sites over a 15-year period. Over the same period a further 2,414 new homes are identified on non-strategic site allocations, which might include some developments that fall within the GLA's definition of small sites. Nevertheless, it is clear that Newham's assessment of capacity based on local character falls far short of its 9,500 ten-year target for small sites as set out in Table 4.2 of the Draft London Plan.
Furthermore, the support that the Mayor gives for the application of affordable housing requirements to schemes of 10 units or fewer represents a further viability constraint on their delivery, which could cancel out any benefits of the presumption in favour principle.

To better understand the potential impact of Policy H2, it is worth considering the impact of another recent planning intervention i.e. the changes to the permitted development rights that allow change of use from office to residential. This is a much stronger planning intervention embedded in law and not just policy. The requirements for change of use under permitted development, and the considerations that can be taken into account when determining applications for prior approval, are far less onerous than that of schemes requiring full planning permission, even with Policy H2 in place. Yet despite this, the GLA's own evidence shows that for the 8-year period assessed in Approach 1, just 4,430 new homes on small sites were delivered through office to residential permitted development rights. The majority of these were completed during 2014/15 and 2015/16, which equates to approximately 2,215 a year. Far short of the 14,068 homes a year, which is the difference between Approach 2 and Approach 3 that the GLA is primarily ascribing to the effect of Policy H2.

Overall, Merton / The Crown Estate consider that the Draft London Plan places an over reliance on the capacity of small sites that is unrealistic and not supported by the evidence, particularly in the Outer Boroughs. The available evidence clearly shows that small sites will deliver only a small proportion of homes needed to meet the targets set out in Table 4.2, and it is unrealistic to assume that Policy H2 will have sufficient impact to increase delivery to the target levels. Consequently, Merton / The Crown Estate submit that the Draft London Plan does not set out a strategy that will meet housing need.

User:	Oneill Homer
H2 Given the resource limitations of Boroughs and the risk that the ‘presumption in favour’ could lead to poor schemes in the wrong places, neighbourhood plans provide an excellent and speedy opportunity to identify small sites (through their own ‘call for sites’ exercises and local knowledge of land interests) and to identify through their allocation and/or design policies the key development principles to encourage quality proposals.	

User:	Kent Leaders

The draft London Plan also introduces an increased emphasis on delivering small sites for housing (Policy H2). The delivery of small sites is supported in so far as it will help to increase delivery of new homes. However, the development of small sites can hamper the ability to provide comprehensive infrastructure to support housing growth, and there will need to be mechanisms in place to prevent knock-on impacts, particularly on Kent's districts and boroughs adjoining the London boundary, where service capacity is already stretched. In order to prevent the Plan from being too prescriptive in determining growth of housing on small sites, it would be beneficial to undertake further collaboration with local boroughs to encourage delivery on a variety of sites based on local opportunities. In some locations, the level of delivery on small sites may be unachievable due to the lack of availability of land.

User:	Romford Civic Society

Paragraph 4.2.9. I support the principle of “no net loss of overall green cover” as a result of small housing developments, and support “off-site provision such as new street trees” in order to achieve this principle. I recommend an addition (in CAPS) to the following sentence: "Loss of existing biodiversity OR GREEN SPACE, as a result of small housing developments, should be mitigated through measures such as the installation of green roofs, the provision of landscaping that facilitates sustainable urban drainage, or off-site provision such as new street trees in order to achieve the principle of no net loss of overall green cover. Rainwater attenuation features should be incorporated to achieve greenfield run off rates. LOSS OF ANY PUBLIC GREEN SPACE WILL BE COMPENSATED FOR WITH ALTERNATIVE ACCESSIBLE SITES.”

User:	L&Q

Presumption in favour of small sites

The current draft London Plan presumption in favour applies in some but not all instances

The presumption in favour should all apply to all ‘small site’ schemes. No rationale for differentiating between locations is provided in the support text. The presumption in favour does not in any case specify details such as scheme massing or density.

User: National Custom and Self Build Association

Chapter 4 Housing Policy H2 Small sites A) 4

Policy H2 Small sites

A) Small sites should play a much greater role in housing delivery and boroughs should pro-actively support well-designed new homes on small sites through both planning decisions and plan-making in order to:

4) support those wishing to bring forward custom, self-build and community-led housing.

NaCSBA supports Policy H2 A) 4) which recognises the importance of small sites in facilitating the delivery of custom, self build and community led housing schemes. NaCSBA suggests that it be highlighted that smaller sites can also be created through the subdivision of larger sites, facilitating access for SME housebuilders, affordable housing provision, custom and self build, community led housing and other forms of delivery that can accelerate the rate of build out and contribute to the high quality of design, diversity, sustainability and affordability.

NaCSBA supports the Written Ministerial Guidance that small sites of ten units or fewer and which have a maximum combined gross floor space of no more than 1,000 sqm be exempt from s106 contributions for affordable housing either on site or through a tariff approach to off-site contributions but recognises that this does not automatically override local policy. The Planning Inspectorate (PINS) confirmed this approach on 9 Mar 2017.

Custom and self build housing can contribute towards genuinely affordable housing provision as defined in the NPPF across a number of tenures, including social rent, discounted market rent, shared ownership and discounted market sale retained in perpetuity by a s106 occupancy agreement.

NaCSBA proposes that where such provision is made within a small development it should be given recognition as contributing to the affordable housing provision.

Additionally, it is important to recognise that self build is often chosen as a route to home ownership precisely because it can be more ‘affordable’ than market housing, as it removes the developer margin and because there is scope to reduce labour costs further through DIY. This is not classed as ‘affordable housing’ as defined in the NPPF, as the average saving of 29% compared to end market value is not held in perpetuity. None the less, many self builders feel frustrated where a contribution towards affordable housing through a s106 commuted sum payment, or proportional allocation of sites within a larger scheme, affects the viability of their project.

NaCSBA proposes that where Policy H is applied, individuals and groups of individuals looking to build low-cost homes through custom or self build should be able to apply for a special exemption from s106 contributions in line with the WMS, limiting the scheme to 10 units or a cumulative GIA of 1000m2, or a maximum value per unit. A mechanism aligned with the existing CIL exemption scheme could be used to ensure eligibility and clawback.

User: National Custom and Self Build Association

Chapter 4 Housing Policy H2 Small sites H) 4.2.2

H) Boroughs wishing to apply affordable housing requirements to sites capable of delivering ten units or fewer and which have a maximum combined gross floor space of no more than 1,000 sqm should only require this through a tariff approach to off-site contributions rather than seeking on-site contributions. Boroughs are strongly encouraged to provide the flexibility for payments to be collected prior to the occupation of development, rather than prior to commencement of development.

Policy H2 Small sites

4.2.2 Increasing housing output of this scale can also help to support a number of related housing and planning policy objectives. This includes:

• *providing opportunities for custom-build housing and community-led housing projects*

NaCSBA supports policy H2 Small Sites 4.2.2 and the recognition of the importance of smaller scale sites in creating opportunities for custom-build housing and community-led housing projects. NaCSBA proposes that additionally recognition be given to the potential for such sites to come forward as serviced plots for self build, alongside custom build development.

Policy H2 A) 4. refers separately to custom, self build and community led housing. NaCSBA supports the recognition that these are each distinct forms of housing delivery that can also be closely related. 4.2.2 should therefore be amended in line with 4.

See Appendix A for some helpful definitions.

User:	National Custom and Self Build Association

recognition be given to the contribution towards genuinely affordable housing that can be delivered through custom and self build across multiple tenures.

The policy should be amended to ensure the viability of small self build schemes is not harmed by the need for affordable housing contributions where the requirements have already been met.

User: Local London Partnership

Local London is concerned at both a policy and practical level with the Policies relating to small site development. With regard to Policy H2 we believe the criteria for a presumption in favour are too broad and have the potential to adversely impact on the character and environmental quality of very suburban, low density, locations (for instance Gidea Park, Upminster, Southgate and Oakwood) which happen to be within 800m of a tube or rail station and where higher density development would be inappropriate. We consider careful local determination of capacity coupled with flexibility are key to developing small sites.

We are also concerned about the resource implications of properly managing Policy H2 through the use of ‘area wide design codes’ and the timing of the implementation of the Policy. Local Authorities are already under considerable financial pressure and securing and resourcing professional staff to produce design codes will be challenging. The codes will also take some time to draft and consult. If the intention of the Policy is to achieve ‘Good Growth’ in accordance with Policies GG1 to GG6 the preparation of design codes is a prerequisite for the implementation of Policy H2. Therefore a phasing of the implementation of Policy H2 should be set out to allow reasonable time for Boroughs to prepare and adopt areas design codes in advance of development and the application of the presumption in favour. We also believe that the Mayor should proceed with some caution with regard to this Policy as design codes are not going to provide a one-size fits all solution for small sites which are often widely distributed and with unique site specific parameters to consider which could lead to an increase in the incidence of Planning by appeal.

We would also ask that the Mayor works with the Boroughs to lobby Government for the resources, through fees or other means, to assist in funding this work. Indeed the need to fund the planning system adequately to deliver the Plan objectives should be strongly referenced by the Mayor in Chapter 11 of the Plan.

With regard to the Policy for development of small sites set out in H2 we are a also concerned that it will be in the nature of the incremental increase in the residential population of town centres and other locations arising from small site development that the provision of new social, health, educational, local transport and leisure and recreation facilities, if funded through planning agreements, will lag considerably behind the pace of development.Boroughs will need to aggregate contributions from a series of developments over time in order to secure the significant post of funds necessary to provide new facilities. This will work against the full realisation of the Good Growth Policies.

There is a great emphasis given to the development of small sites (as opposed to the housing supply coming from larger developments) many of which may be of 10 units or less and there must be concern that the inability of boroughs to seek S106 contributions for affordable housing or to pooled funding ‘pots’ intended to fund the provision of general infrastructure in the wider area will impact on their ability to mitigate for the environmental impacts of the proposed scale of housing and population growth. This will adversely impact on the general health and well-being of the community and will inhibit and work against the achievement of the Plan’s policies on ‘Good Growth’. If the Mayor is seeking to achieve ‘Good Growth’ through this Plan with a very high proportion of development on small sites he, with the support of the Boroughs, should seek Government agreement to a change to the current policy set out in the Ministerial Statement of 24th November 2014 in order to recognise the special circumstances in London created by the London Plan.

The Plan provides for a very significant increase in the housing projections for boroughs with outer London characteristics with the majority of the housing being provided from small sites - between 47% and 69% for Bexley, Enfield, Havering, Redbridge and Waltham Forest. Newham’s target is a substantial uplift on current London Plan target (excluding LLDC) going from 19,945 to 38,500. This is an increase of 18,555 additional units (or 1,856 annually) a 93% rise. As an example, Newham’s average small sites delivery is 231 (actual 6 year average) as compared to 950 a year in the new target (over 4 times as much).

User:	Highams Park Planning Group

POLICY GNE2: Development of Garden Sites

Where any development is proposed which requires the demolition of property in residential use to provide new homes, the land area of the open space within the development curtilage should not be reduced by more than 20%.

User: Judith Howard

Making London greener is essential for people’s health and wellbeing. Yet many local green spaces face pressure from new development. The Plan must recognise that loss of green space cannot always be made up for through green roofs and sustainable drainage schemes, valuable though these features are (para 4.2.9). Policy should make clear that provision of and access to green space should always be considered when planning new development.

I welcome the reference to urban greening in Policy D7 Public Realm. This should include a broader commitment to, and requirement for, conserving and restoring urban nature rather than the current common approach to installing trees in concrete or tubs and planting of low nature value.

User: Mrs P Matthews

I support the principle of “no net loss of overall green cover’ as a result of small housing developments and support “of site provisions such as new street trees” in order to achieve this principle.

I recommend an addition to the following sentence: loss of existing biodiversity or garden space. As a result of small housing developments should be mitigated through measures such as the installation of green roofs. The provision of landscaping that facilitates sustainable urban drainage or off site provision such as new street trees in order to achieve green field run off rates. Loss of any public green space will be compensated for with alternative accessible sites.

User: Taylor Wimpey UK

Policy H2 Small sites Part B2)

We are supportive of positive planning policy that makes it easier for SMEs to bring forward housing delivery from small sites.

However, as identified earlier in our representations, we are concerned that the amount of detail and supporting evidence required from both Policy and Supporting text may create unreasonable burdens in terms of both costs and time and would not be proportionate to the proposals.

Boroughs wishing to apply affordable housing requirements to sites capable of delivering ten units or fewer and which have a maximum combined gross floor space of no more than 1,000 sqm does not comply with current national planning policy which exempts schemes of 10 units or fewer from Affordable Housing. Proposals to depart from national policy should be argued by the London Boroughs with compelling evidence to justify their position.

Table 4.2 - 10 year targets (2019/20 -2028/29) for net housing completions on small sites (below hectares in size)

As set out previously, we are concerned that there is an overreliance on supply from Small Sites and that the assumptions made do not have regard to local demand, site constraints and opportunities or viability.

Where the annual target from small sites is not being delivered, the Local Planning Author ity should be required to review its Local Plan, or prepare a site allocations DPD to ensure a supp ly of specific deliverable sites to provide 5 years worth of housing is maintained.

User: Cirrus Land and The Guinness Partnership

Small Sites

In order to try and meet the housing target the draft London Plan relies upon 24,573 homes (Table 4.2) coming forward from ‘small sites’ to help meet delivery of the overall housing target for London. This represents approximately 38% of the total number of new homes required. In Hillingdon, to deliver its specific ten-year housing target of 15,530 homes, approximately 7,650 homes (Table 4.2) would need to be built on small sites (i.e. 765 dpa).
Based on previous experience, we see no grounds for confidence in believing that the required ‘step change’ with respect to ‘small sites’ will take place particularly to the extent sought in the draft London Plan.

Achieving the proposed delivery rate represents a significant challenge. The London Strategic Housing Land Availability Assessment (SHLAA) (November 2017) demonstrates that the average number of completions across ‘small sites’ from 2004/05 to 2015/2016 has been 10,828 (Table 6.3), significantly lower than the rates being targeted. Moreover, the SHLAA indicates this figure has only exceeded 12,000 dpa (i.e. roughly half the target) in 4 of these 12 years (Table 6.1). Indeed, in Hillingdon the average rate of completions on small sites for the same period is 203 dpa, which is only 26.5% of the 765 dpa that the Plan needs to be built to meet its small sites target for the Borough.

Furthermore, for the following reasons we do not consider it possible for there to be a step change increase in small site delivery in London:
(i) there is a general lack of organisational knowledge or capacity on the part of those in control of most small sites;
(ii) there is a significant financial outlay in promoting development on such sites;
(iii) there is a potential lack of confidence on the part of some promoters in securing a profit sufficient to justify the cost and risk involved;
(iv) there is a general lack of confidence on the part of some promoters of small sites in being able to justify pursuing a scheme against its existing or alternative use value; and
(v) the planning, legal and ownership issues associated with some small sites are often complex and difficult to address.

It seems far more realistic to assume, instead, that the delivery rate continues at 10,828 dpa. In that scenario the New London Plan’s housing supply falls to 51,190 homes per annum, far short of need, whatever calculation is used.

This brings into sharp focus the need to identify other sources of supply of housing, in particular sites such as Yiewsley Waterside (which is referred to in our overall response to the New London Plan). Furthermore, by identifying sites such as Yiewsley Waterside for development, it would also reduce the need to develop land within sensitive parts of existing suburban areas, which could lead to its over-intensification and adversely affect its existing character, a concern in Hillingdon Borough.

User: Aitch Group

The London Plan should provide a presumption in favour of all residential development

Draft London Plan Policy H2 sets a presumption in favour of the delivery of homes from some (but not all) ‘small sites’. We would like to see this presumption extended to all sites.

Given the scale of London’s housing crisis, the Draft London Plan must emphasise that the delivery of new homes should be afforded significant weight when determining planning applications, because of the scale of the housing crisis and the potential consequences of not delivering the new homes that London desperately needs.

A presumption is important because it will elevate this matter as a planning consideration for the decision-maker.

User: Aitch Group

The scale of the 'housing crisis' requires the managed release of protected land for new homes – The supply of new homes identified in the draft London Plan is reliant upon '*substantially… increasing the rate of housing delivery from small housing sites*' (paragraph 4.2.1).

We do not have confidence that this scale of delivery is achievable. Moreover, whilst delivery from '*small sites*' may be a '*strategic priority*' (draft London Plan paragraph 4.2.1), the referral criteria will almost always preclude the Mayor from directing the development of any new homes at such locations.

In view of the above it is clear that the London Plan must conduct a housing delivery review to consider additional sources of supply. This review should include:

• The release of more land for new homes at appropriate industrial sites, where it can be demonstrated that these proposals can deliver an appropriate living environment and will not prejudice the long-term functionality of the employment / industrial land.

User: Elephant Amenity Network

Policy H2 Small sites

2.1 While some protection for exiting social-rented homes is provided in respect of larger scale estate regeneration and demolition (Policy H1o), we are worried that social housing estates will be targeted for small scale demolition and development through this policy, resulting in on going loss of precious social-rented homes, green and play spaces. Section B(1) is of concern in this respect.

2.5 We support the inclusion in Policy H2A(4) – providing support for custom, self-build and community-led housing, but feel that the policy should be strengthened.

2.6 We propose the following:
• Policy H2 should more actively encourage custom, self-build and community-led housing – particularly where it meets social / low cost rented need;
• it should require boroughs to establish relationships / work closely with local custom, self-build and community-led housing organisations to delivery social / low cost rented homes; Leathermarket JMB being a good example of this;
• design codes should not be determined on clear measurable standards;
• the following text (in bold should be added to section F7 - social housing estates, including estate regeneration schemes, unless full consultation has been carried out and full agreement attained in line with the Mayor’s good practice guide on estate regeneration.

User: Hill and Trustees of the Gwyneth Cowing Will Trust

A large proportion of the housing delivery targets (38%) is on small sites as set out in Table 4.2 of the Draft London Plan, this is particularly the case in the Outer Boroughs where the proportion rises to 46.5%. Whilst Hill broadly support Policy H2 *Small sites,* they consider that the potential effect of this policy on housing delivery has been overstated in the GLA's Strategic Housing Availability Assessment 2017 (SHLAA). As a result Outer Boroughs will be unable to meet their housing delivery targets unless they identify additional capacity.

Against this context it is crucial that individual ambitions within the Draft London Plan do not simply become constraints on development. Hill recognise the importance of London's green infrastructure which brings a wide range of benefits and they support its protection and enhancement. However, they consider that the Mayor's ambition to make London at least 50 per cent green by 2050 could undermine housing delivery whilst doing little to address AoD. In particular they are concerned that policies within Chapter 7 *Green Infrastructure and Natural Environment,* as currently drafted could prevent the allocation of the Whalebones site for development that delivers housing, community facilities and enhanced green infrastructure in the form of public open space, at the outset of the 10 year period.

User: Meyer Homes

The Capacity of Small Sites

Meyer Homes consider that the strategy set out in the Draft London Plan has an over reliance on capacity of small sites to housing need. The Draft London Plan attributes a significant proportion (38%) of the increased housing targets across London to small sites, which are essentially windfall sites. This is particularly the case for the Outer Boroughs where the proportion of the housing target attributed to small sites rises to 46.5%.

Paragraph 48 of the National Planning Policy Framework (NPPF) and Planning Practice Guidance1 states that 'windfall' assumptions for the projected rate of housing delivery on unidentified sites can be included in assessments of potential housing supply, providing there is 'compelling evidence' that such sites have consistently become available in the area and will continue to provide a reliable source. In estimating capacity on small sites the GLA has considered three approaches as set out below:

· Approach 1 - an 8 year windfall assessment based on post-recession trends
· Approach 2 - a longer term 12 year windfall assessment
· Approach 3 - a 'modelled approach'

Based on the findings of Approach 1, over the period between the financial years 2008/9 and 2015/16, a total of 79,370 homes were delivered on small sites, which equates to 9,921 homes a year. Based on the findings of Approach 2, over the period between the financial years 2004/5 and 2015/16, a total of 129,940 homes were delivered on small sites, which equates to 10,828 homes a year. As such delivery on small sites will need to increase dramatically over current trends if the small sites target of 24,573 homes a year, as set out in Table 4.2, are to be met.

In Approach 3, the modelled approach, the GLA has examined the scope to increase current trends in housing completions on small sites as a result of policy changes proposed in the Draft London Plan, in particular Policy H2 Small sites. Once trend forecasting based on historical trends is taken into account, Approach 3 generates a dramatically different estimate to the more evidenced based Approaches 1 and 2. The projected ten year capacity estimates for each approach are set out in the table below.

	Approach 1	Approach 2	Approach 3
Projected 10 year capacity figures	93,710	104,592	245,280

Policy H2 *Small sites* states that boroughs should apply a presumption in favour for small housing development. This would apply to infill development and vacant underused sites and residential extensions, conversions and re-builds in areas with a PTAL over 3 or within 800m of a Tube station, rail station or town centre. It also applies to redevelopment or upward extension of flats and non-residential buildings to provide additional housing. Proposals should comply with design codes, which the policy encourages boroughs to prepare. It also states that where affordable housing requirements are applied to schemes delivering 10 units or fewer, it should be based on a tariff approach to off-site contributions.

Meyer Homes welcome the support that Policy H2 provides for developers of small sites. However, they consider that the Mayor has significantly over estimated the impact that this policy, and the package of measures outlined in the Draft London Housing Strategy, will have. The modelled approach is a high level assessment of capacity, and whilst it does factor in conservation areas and listed buildings, it does not represent a fully evidenced local level assessment of capacity, such as is promoted elsewhere in the Draft London Plan (see Policy D2 *Delivering Good Design*).

Overall, Meyer Homes consider that the Draft London Plan places an over reliance on the capacity of small sites to meet objectively assessed housing need, particularly in the Outer Boroughs. The available evidence does not suggest that small sites will deliver anywhere near the number of homes needed to meet the targets set out in Table 4.2, and it is unrealistic to assume that Policy H2 will have a sufficient impact to increase delivery to these levels. Consequently, Meyer Homes consider that the Draft London Plan does not set out a strategy that will meet housing need.

User: Unknown

13. Policy H2 (small sites) leads on from policy H1 and clearly sets out to increase the role that small sites (defined as being less than 0.25 hectares in size) should have in meeting London's housing needs. Paragraph 4.1.7 confirms that the London SHLAA of 2017 "includes an assessment of large housing sites (0.25 hectares and above) undertaken in partnership with boroughs… In addition, the SHLAA includes an assessment of small site capacity using a combination of trend data for certain types of development and an estimate of potential for intensification in existing residential areas." Given this wording, it appears that this work was not completed in partnership with the Boroughs. Paragraph 4.1.8 confirms that modelling contained within the SHLAA shows that there is capacity for development on small sites for a total of 24,500 new homes a year across London. At 38%, small windfall sites make up a significant amount of the total capacity.

14. Paragraph 4.1.8 also confirms that such a windfall allowance is justifiable given "the policy framework set out in the London Plan; the Capital's reliance on recycled brownfield sites in other active land uses; and the number of additional homes expected to be provided via increases in the density of existing homes through small housing developments." CBRE notes that at no point does this paragraph refer explicitly to evidence.

User: Unknown

Table 4.2 breaks the small sites target down into the individual boroughs. Table 3 below provides a comparison between the DLP small sites target and that in the adopted London Plan for both Bromley and Havering. From this, it is clear that the figures relate to the aims of policy H2. However, certainly in the case of these two Boroughs, the evidence of previous delivery of small sites does not reflect the numbers.

Table 3: Annualised average London Plan housing delivery targets for ‘small sites’ 2004-2019 and percentage of total housing target

	2016	2019	%increase since 2016
Bromley	352 (55%)	1029 (72%)	292%
Havering	150 (13%)	904 (48%)	603%

Source: Table 3.11 of London Plan SHLAA 2016, Table 4.2 of Draft London Plan 2017.

16. Paragraph 1.14 of Bromley’s Five-Year Housing Land Supply statement published in November 2017 confirms that: “evidence was provided to the Examination into the Further Alterations to the London Plan (2014) in relation to the increased small site target for the Borough. It was considered by Bromley Council that the small site target uplift [from 313 to 352] was too high and not sustainable over time. This evidence was not accepted and the relevant small site target for the Borough was 352 units per annum based on the 2013 SHLAA for the period 2015-2025 when the Further Alternations were adopted in 2015.”

17. Table 1 of the same document confirms that over the last five years Bromley has delivered a total of 1,425 units on small sites, equivalent to an annual rate of 285. The evidence suggests Bromley were correct to challenge the potential to deliver 352 units on small sites annually. Critically, this evidence far from proves the DLP target is appropriate, with Bromley’s historic delivery of 285 units on windfall sites accounting for just 28% of Bromley’s DLP annual target.

18. Similarly, paragraph 5.18 of Havering's Housing Position Statement published in July 2017, confirms that an average 186 units have been delivered on small windfall sites per year over the last five years. As such, they have applied this evidence to their housing supply, which is reasonable in the context of paragraph 48 of the NPPF. Whilst this rate has exceeded the current adopted London Plan annual rate of 150, it remains 21% of the annual housing target for small sites in Havering as set out in the DLP.

19. Historic windfall delivery rates are required to justify allowance of windfall sites in an LPA's five-year housing land supply, as set out in paragraph 48 of the NPPF. The above confirms there is no evidence to support the housing targets for small sites in Bromley or Havering as set out in the DLP, with the likely inference that this will be the case for many other Boroughs.

20. Paragraph 4.2.8 acknowledges that: "small housing developments are envisaged to be within close proximity to existing homes. These should be carefully and creatively designed to avoid an unacceptable level of harm to the amenity of surrounding properties in relation to privacy, for example through the placement and design of windows and the use of landscaping". At the same time, policy H2 actively seeks to increase the densities
of small sites, which in turn are unlikely to be favourably received by residents within close proximity.
Conversely, planning applications for the development of large strategic sites, are often far less sensitive for the following reasons: (i) they are a greater proximity from existing homes so amenity impact is less; (ii) they generally benefit from a Local Plan allocation which has already been the subject of consultations; (iii) they provide the necessary infrastructure to support the additional population, often on site, if not through CIL or s106 contributions; (iv) they can support higher densities because they form their own character, focus and brand, and; (v) they often provide an opportunity to redevelop a large site that is either derelict or could benefit from remediation.

User: Unknown

In terms of overall delivery, we note that despite the huge increase in housing targets for Havering and Bromley, only one new Opportunity Area (OA) in Romford has been identified within either of these Boroughs that can assist with delivering a greater number of homes. This will be supported by the forthcoming Elizabeth Line. However, the anticipated level of growth in Romford, the rest of Havering as well as in Bromley has already been planned for in their respective forthcoming local plans. In the case of Havering, Rainham and Beam Park forms part of the London Riverside OA. It is expected to become a key source of housing for the Borough, but, to date, the hybrid application for up to 2,900 new homes remains pending. It is noted that this allocation dates back to at least 2008 and not a single home has been constructed. The OA's Planning Framework, as published in 2015, acknowledges its wider area capacity of up to 26,500 homes1, however, seemingly without explanation, we note that the DLP suggests the capacity is now 44,000 homes2, equivalent to a 66% increase.

22. Paragraph 2.0.4 of the DLP acknowledges – and we agree – that to enable the successful delivery of such areas "infrastructure is key". However, Romford OA aside, there are no other committed notable infrastructure improvements to support the other two aforementioned OAs. Whilst we acknowledge the proposed Beam Park railway station in Havering, to date, we understand this has not been secured and such a proposal has been an aspiration dating back to at least 2008 during the previous Havering local plan review.

23. A failure to achieve the housing targets caused by a reliance on such a high proportion of windfall sites and a lack of identified strategic sites (amongst other reasons) will put more sensitive sites at risk of development, or, if London fails to consume its own growth, add to its reliance on authorities beyond London to address the City's housing needs. We acknowledge the requirement for authorities outside of London to cooperate with the Mayor, but a priority must be for the Mayor to ensure his own housing policies are sound, effective and compliant with the NPPF, in accordance with paragraph 182.

User:	Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living

H2 (152) - Small Sites

Certain smaller sites may be suitable for the provision of housing for older people if located in appropriate locations. Design flexibility on such sites is welcome, especially so considering the unique design requirements of older people's housing proposals.

The DLP sets out aspirations to increase the supply of housing for older people by 2000% above current estimated supply (based on a current estimated supply across London of 100-200 units per annum). Only by allowing flexibility and by adopting a similar in favour presumption to that proposed in draft policy H2, will the supply of retirement housing increase to sustainable levels.

This policy is supported in principle but the presumption in favour of development should be expanded to include retirement proposals more generally.

User: FINCHATTON, ASSURE PROPERTY, ATLAS, KALLARS, INVESTRA AND 10 ANT GROUP

The consortium have extensive experience of delivering housing on small sites across London. They welcome the recognition that small housing developments should play a greater role in housing delivery. In particular they support the intent of Policy H2 Small sites, which seeks to provide greater planning certainty on small sites. However, developing small sites can be extremely challenging and they are concerned that the measures set out in this policy alone will not be sufficient to increase the rate of delivery to meet the Draft London Plans housing targets.
It is against this context that we set out below our Clients representations on the Draft London Plan. We have focussed only on the delivery of housing on small sites and sought to make positive suggestions to assist with the preparation of a London Plan that is positively prepared to meet the objectives, principles and policies of the NPPF. We are mindful that the NPPF is currently under review and reserve our position to modify these representations in light of any changes to the NPPF.

The main points of these representations with respect to the Draft London Plan are as follows:
? Strong support for Policy H2 Small sites;
? The effectiveness of Policy H2 is fundamental to the soundness of the Draft London Plan;
? Modifications are suggested to improve the effectiveness of Policy H2 by reducing the impacts of the planning process on the development of small sites.

User: FINCHATTON, ASSURE PROPERTY, ATLAS, KALLARS, INVESTRA AND 10 ANT GROUP

Housing Delivery on Small Sites

In his recently published Draft Housing Strategy the Mayor made it clear that *"London's housing crisis is the single biggest barrier to prosperity, growth, and fairness facing Londoner's today."*[1] As a result housing delivery targets have increased substantially, particularly in the Outer Boroughs where the increases have been most significant. For example Merton's housing target has increased by 223%, Bexley's by 179% and Hillingdon's by 178%. The consortium support the increased housing delivery targets set out in Table 4.1 of the Draft London Plan and welcome the acknowledgement that delivery rates will need to almost double to meet them. The bottom line is that we need to ensure that significantly more homes are built in Outer London, particularly on small sites.

The consortium support the new targets for housing delivery on small sites as set out in Table 4.2. However, they note that these represent a very significant proportion of the overall housing targets. Overall, capacity on small sites accounts for 38% of the housing targets set out in Table 4.1 and this increases to 46.5% in the Outer Boroughs. To meet these targets delivery of housing on small sites will have to increase by circa 150% over historic trends [2]. In reality the contribution of small sites to housing supply in the Outer Boroughs has fallen over the last decade[3]. Policy H2 *Small sites* seeks to reverse this trend. It's effectiveness in doing so is therefore fundamental to the soundness of the Draft London Plan.

The consortium strongly support the positive intent of Policy H2 *Small sites* to deliver more housing on small sites. In particular they support the presumption in favour of various forms of small housing development. However, they consider that this policy needs to go further if it is to be effective in increasing the rate of housing delivery on small sites sufficiently to the meet the housing targets.

As noted in the Draft Housing Strategy the development of small sites can be extremely challenging with "*a number of obstacles to delivery, notably the availability and cost of land, and the complexity, cost and sluggishness of the planning system*." The consortium largely agree with the survey findings of the NHBC Foundation with regards to the impacts of the planning process on the development of small sites[4]. These impacts include the length of time, unpredictability and inconsistency of the process, onerous conditions and section 106 legal obligations and the costs associated with increasingly complex validation requirements.

[1] Draft London Housing Strategy 2017
[2] 2017 London Strategic Housing Availability Assessment
[3] Outer London Commission, ‘Sixth Report: Removing the barriers to housing delivery’, 2016
[4] NHBC Foundation, ‘Small house builders and developers: current challenges to growth’, 2017

User: FINCHATTON, ASSURE PROPERTY, ATLAS, KALLARS, INVESTRA AND 10 ANT GROUP

Policy H2 Small Sites

It is against this context that we approach Policy H2 Small Sites of the Draft London Plan. The consortium broadly support this policy and its intent to increase delivery on small sites by encouraging speedier, more consistent, positive planning decisions. However, whilst this helps address one of the main impacts of the planning process, it does not address other issues such as onerous conditions and section 106 legal obligations and the costs associated with increasingly complex validation requirements.

Before we discuss these issues further, we should give consideration to the scale of development that is covered by Policy H2 Small sites. The application of this policy is triggered by a one to 25 unit threshold on sites that do not exceed 0.25 hectares. This means that small sites developments will fall into two categories, minor and major development, as defined by planning legislation. The consortium consider that there would be some merit in drawing a distinction between these two categories of development within Policy H2 Small sites as discussed further below.

Turning first to conditions attached to planning approvals. In the consortiums experience the number of planning conditions attached to planning approvals has steadily increased in recent years. This is supported by the findings of the NHBC Foundation survey. It is not uncommon for planning approvals to have 20-30 conditions, many of which have to be discharged prior to commencement of development. The government's recent consultation *Improving the use of planning conditions*, recognised the constraint that unjustified pre-commencement conditions place on development. To help address this issue we would suggest the following modification:

(Insert)
J When making planning decisions boroughs should minimise the use of conditions that require approval of details, particularly conditions that require discharge prior to commencement of development.

With regards to section 106 legal agreements, their preparation alone can lead to significant legal costs and protracted decision times. The consortium have found that section 106 legal agreements are increasingly being sought for small scale developments of ten units or fewer. Government advice is clear that affordable housing and tariff style planning obligations should not be sought from small scale development, defined as developments of ten units or less with a maximum combined gross floorspace of no more than 1,000 square metres. However, Part H of this policy conflicts with this advice and in effect provides a tacit support for the application of affordable housing tariffs to minor development on sites delivering ten homes or fewer. Not only is this contrary to Government advice, it places an additional financial burden on small scale development where viability is often marginal. It is the consortiums view that the application of affordable housing obligations to schemes of ten units or fewer will constrain delivery of small sites rather than encourage higher rates of delivery.

The consortium consider that there is however some merit in a tariff based approach for major developments of between 11 and 25 units. Viability is often particularly challenging for this scale of development as they are subject to all the planning risks and costs associated with major applications, such as increased validation requirements, longer decision times, decision by committee and planning contributions. Many of these schemes will find it difficult to meet the threshold of 35% affordable housing as set out in Policy H6 Threshold approach to applications, which means greater uncertainty and cost associated with the viability route followed by late stage reviews that make securing finance difficult.

Even where such schemes are able to provide 35% this would result in just 9 affordable units on a development of 25 units. In practice Registered Providers are reluctant to take on such a small number of units in a development, as it creates management costs and difficulties. This can render schemes with an on-site affordable element undeliverable. On this basis we suggest that the Mayor supports a tariff based approach to affordable housing on small sites delivering between 11 and 25 units. We would therefore suggest the following modification to address the above issue in relation to both minor and major developments on small sites:

(Delete)
H Boroughs wishing to apply affordable housing requirements to sites capable of delivering ten units or fewer and which have a maximum combined gross floor space of no more than 1,000 sqm should only require this through a tariff approach to off-site contributions rather than seeking on-site contributions. Boroughs are strongly encouraged to provide the flexibility for payments to be collected prior to the occupation of development, rather than prior to commencement of development.

H Boroughs should not apply affordable housing requirements or tariff based planning contributions to sites capable of delivering ten units or fewer and which have a maximum combined gross floor space of no more than 1,000 sqm. Other matters such as car-free agreements and highway works should be secured via condition.

I On sites capable of delivering between 11 and 25 units or which have a combined gross floor space of more than 1,000 sqm, affordable housing provision should be secured through a tariff approach to off-site contributions rather than seeking on-site contributions. Boroughs are strongly encouraged to provide the flexibility for payments to be collected prior to the occupation of development, rather than prior to commencement of development.

Finally, having regards to validation requirements, in the consortiums experience these have become increasingly complex over recent years. Local validation checklists usually make a distinction between minor and major development, with major developments often subject to a full range of validation requirements. However, there is often very little distinction between small scale, major development, which can have relatively minor impact compared to large-scale major developments. The consortium consider that it would assist delivery if boroughs were to recognise as a validation category, small scale major development of between 11 and 25 units, and seek to reduce the burden of validation requirements. As such we suggest the following modification:

(Insert)
K Boroughs are strongly encouraged to prepare validation checklists that recognise small scale major development of between 11 and 25 units, and seek to reduce the burden of validation requirements for this form scale of development.

User: Urbanissta

Policy H2 Small Sites

Policy H2 applies weight to smaller sites and its role in delivering housing across London. Boroughs are encouraged to apply presumption in favour of the following types of small housing between 1-25 homes:

- Infill development of vacant or underused sites
- Proposals to increase density of existing residential homes within PTAL 3-6 within 800m of a station through conversions, extensions and redevelopment or existing residential properties.

Comment: Urbanissta are supporting of the measures introduced by the new London Plan to increase the number of small sites developed for housing.

User: London Borough of Camden

general support for development of small sites, but significant concerns about some aspects of policy H2

o Policy H2. We agree that local character evolves over time and will need to change in appropriate locations and welcome the Mayor's commitment to review of GLA design guidance.

o The intended effect appears to be that policy requirements affecting residential development would have less weight for schemes involving 1 – 25 homes. the 'presumption in favour' will conflict with other policies and obligations, such as those protecting open space and heritage assets and seeking affordable housing

o 97% of residential developments in LB Camden involved 1 - 25 homes over last 10 years. In that context, the Council does not consider it is necessary or appropriate to relax planning requirements in the Borough to encourage the development of small sites.

o under planning law, decisions on planning applications must take into account the development plan as a whole and all other material considerations.

o Criterion E conflicts with the statutory duty under the Planning (Listed Buildings and Conservation Areas) Act 1990 s.72(1) to pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area. The term 'unacceptable harm' implies that a level of harm to a conservation area is acceptable and to be expected. This departs from the statutory requirement by encouraging an ‘acceptable’ level of harm through extensions, demolitions, new build and development on valued spaces.

o Camden has 39 conservation areas. All covered by detailed Conservation Area Appraisals and Management Plans. The London Plan should seek design codes for conservation areas where detailed appraisals already exist.

o We note that the Criterion E indicates that the presumption in favour would only operate where no design code is in place. However, introducing design codes for across all areas in each borough is a vast task. Even if a significant proportion of planning resources were diverted into the task, it would be many years before boroughs enjoyed full coverage.

o Design codes would be highly resource-intensive to produce, and are unlikely to be appropriate dense urban areas such as Camden, with a rich variety and complexity of built form and numerous concentrations of heritage assets.

o Lack of sufficient expertise available to prepare design codes for all London boroughs, within a short period of time.

This will divert resources away from:

· the preparation of area-based development briefs and frameworks on large sites

· reviewing and updating of Conservation Area Appraisals and Management Plans

· Local Plans and site allocations

· The GLA should resource additional borough research it seeks to prioritise.

- Green spaces, back gardens and trees are often important aspects of character, as are vacant or underused sites
- Criterion E specifies some types of harm that would be unacceptable, but this list is extremely limited.
- We do not support the 'presumption in favour' but if the approach is to be retained, we consider that this Criterion should be broadened to include a much wider view of harm, consistent with final bullet point of NPPF paragraph 14.
- As a minimum, we consider that the presumption should only apply to small housing developments that include any affordable housing provision required by policy, and the Criterion should be broadened to protect against harm to open spaces and non-designated heritage assets.
- place less emphasis on design codes and indicate that boroughs should 'consider preparing' design codes
- it would be helpful for Criterion H to make a positive statement actively encouraging boroughs to seek payment in lieu contributions to affordable housing from sites of ten or fewer units.
    - use an alternative form of words to 'presumption in favour' in Criteria D, E and F, such as 'proactively support';
- amend the opening sentence of Criterion D to refer only to sites outside conservation areas, i.e.
- replace the second sentence of Criterion E with a requirement to have regard to all relevant Development Plan policies, including those for provision of affordable housing, protection of open space, and protection of heritage assets (including undesignated heritage assets);

- alternatively, amend the second sentence of Criterion E to indicate that where there is no design code or Conservation Area Appraisal and Management Plan, small housing developments should be permitted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Development Plan taken as a whole, or specific policies in the Development Plan indicate development should be restricted
    - amend Criterion F(1) to make reference to statutory listed buildings and their curtilages;
    - amend Criterion F(3) to make reference to proposals that do not provide net additional homes (or dwellings);
    - amend Criterion G to indicate that "New build homes on sites capable of accommodating ten units or fewer which are on the ground floor should *provide step-free access and* meet the M4(2) standard for 'accessible and adaptable dwellings' *or the M4(3) standard for 'wheelchair user dwellings' in accordance with Policy D5 Accessible housing.* New build homes on these sized sites that are not on the ground floor..."; and
    - amend Criterion H to include a positive statement actively encouraging boroughs to seek payment in lieu contributions to affordable housing from sites of ten or fewer units, in line with the statement included in paragraph 4.2.12.

User:	London Borough of Camden

We welcome the encouragement included in this paragraph for boroughs to resist the amalgamation of flats where this is causing the sustained loss of homes. However, the Council considers that concerns regarding amalgamation should be included or cross-referenced in Policy H10 and paragraph 4.10.1, which directly address the loss of housing. We also consider that Policy H3 Criterion A should refer to "taking into account homes lost through demolition, amalgamation or change of use".

User: London Borough of Havering

The emphasis on good design in the draft London Plan in **Policy D2 (Delivering good design)** is strongly supported. It is noted that the draft London Plan seeks to mitigate some of the issues around small sites by boroughs preparing area design codes.

In practice this overlooks that boroughs are already under considerable pressure in regard to resources for plan-making and that securing and resourcing staff to produce these will be extremely challenging and, as a result, there may be an unintended consequence of creating an adverse impact on ‘mainstream’ plan preparation. The preparation of such codes may itself be protracted because of community concerns and they may lag behind such developments coming forward and so be out of step with the ambition of the draft London Plan.

Furthermore, such sites will be tightly constrained in regard to important matters such as pedestrian and vehicle access. They may therefore result in adverse implications for existing residents such as loss of privacy and overlooking. In Outer London locations like Havering, the development of small sites is also likely to result in additional highway congestion and reductions in air quality at a time when Havering is taking steps to tackle these issues through measures such as its Air Quality Action Plan.

User: Camden Conservatives

This policy is inconsistent with the NPPF, and therefore unsound. It provides a “presumption in favour” of small housing development of between 1 and 25 homes for development including conversions, extensions and demolition-and-rebuild schemes within 800m of a tube station, rail station or town centre boundary. As shown by the map at Figure 4.3 of the Draft London Plan, this would include vast swathes of Camden (and indeed, most of Central London).

5. Under the Draft London Plan, such development should be approved if in accordance with a Design Code (see Policy H2(E)). Where there is no such design code, as is the case in Camden, “*the presumption means approving small housing development unless it can be demonstrated that the development would give rise to an unacceptable level of harm to residential privacy, designated heritage assets, biodiversity or a safeguarded land use that outweighs the benefits of additional housing provision*.” The presumption does not apply to statutory listed buildings, but does apply to development within their setting. It applies to development within a conservation area.

6. The policy is inconsistent with national planning policy and legislation for the following reasons:

7. First, section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (“the 1990 Act”) protects not just listed buildings themselves, but also development within the setting of a listed building. It is given effect through paragraphs 128-134 of the NPPF. Where development within the setting of a listed building would cause harm to its significance, *“the NPPF creates a strong presumption against the grant of planning permission…requiring particularly strong countervailing factors to be identified before it can be treated as overridden*”: see R (Lady Hart of Chiltern) v Babergh District Council [2014] EWHC 3261 (Admin). This is reflected in paragraph 134 of the NPPF which only permits development resulting in harm to a listed building (including through development within its setting) where the public benefits of the proposal outweigh the heritage harm.

8. The Draft London Plan is inconsistent with section 66 as it establishes the opposite presumption where development is within the setting of a listed building: requiring the heritage (and other) harm to outweigh the benefits of the proposal. Legislation and national planning policy requires the reverse: for the benefits of the proposal to clearly outweigh the heritage harm. Therefore, as written, the policy is inconsistent with national planning policy. It should be amended to make clear at Policy H2(F)(i) that the presumption does not apply to development within the setting of a listed building.

9. Second, the Policy applies within conservation areas (even where harm is caused to the conservation area). This obviously contrary to legislation and the NPPF for the same reasons. Section 72 of the 1990 imposes the same duty as section 66 but in respect of development within a conservation area. Paragraph 134 imposes the same presumption against development that causes harm to the conservation area, and requires this to be outweighed by the public benefits of the proposal. Again, Policy H2 of the Draft London Plan imposes a reverse presumption in favour of development causing harm to a conservation area, and is therefore inconsistent with National Planning Policy. Policy H2F should be amended to exclude all development within a Conservation Area.

10. Third, there is no requirement for the Design Codes referred to in Policy H2B(2) to be designed to preserve and enhance the character and appearance of conservation areas. This requirement must be expressly written into the policy to ensure that development, causing harm to the Conservation Area, is not automatically presumed to be acceptable under Policy H2(E) once Camden adopts its design codes.

11. For all of these reasons, Policy H2 is unsound.

User:	Association of Consultant Architects

Figure 4.3, showing walking distances to Town Centres, is deceptive because the generic circles shown along the River Thames do not seem to take account of the additional walking time needed in West London to find a bridge.

User: Pocket Living

This policy supports Pocket's core model for smaller schemes as it offers a presumption in favour of development on schemes below 25 units or 0.25ha. This policy would support Pocket in delivering more homes and represents a potential opportunity for delivering wholly affordable schemes in the outer London Boroughs.

However we consider the threshold of 25 units will result in developers submitting lower density schemes to benefit from the presumption in favour whilst reducing their exposure to providing affordable housing within their schemes. Furthermore we can foresee LPAs supporting lower density schemes as these may be less contentious locally. This will result in fewer (affordable) homes being delivered, impacting on the Mayor's target of 66,000 homes per annum.

We recommend that the threshold of 25 units be removed from Policy H2 but the size criteria of 0.25ha is retained, as the threshold to define what constitutes a small site. Table 4.2 has a target for delivery of 24,573 units per year on small sites. If this obejctive is to be met then approximately 1,000 small site delivering 25 homes each would need to be found. In Pocket's experience, while there are a significant number of smaller sites which could be brought forwards, bringing 1,000 forward will be a challenge. However, small sites (under 0.25 ha) can deliver large numbers of homes than this and a 25 unit limit will incentivise developers to deliver unit numbers well beneah the density requirements the Mayor wants to see. We feel that the opportunity offered by small sites could be missed as they are used-up for the delivery of single number of larger homes rather than, for example, a typical Pocket scheme (on a small site below 0.25ha) which could be c.50 homes. Revising this target will allow the use of brownfield land and for which there will be a persumption in favour of development.

The Plan could offer a presumption in favour of development for smaller sites with high PTAL ratings. This would be consistent with H1 which calls for high density development nearer transport hubs.

User:	Age UK London - a charity working with older Londoners

POLICY H2: SMALL SITES

PROPOSED POLICY AMENDMENT:
In H2(E) change ‘residential privacy’ to ‘residential amenity’. This widens the considerations that should be undertaken in assessing small site proposals.

User:	Age UK London - a charity working with older Londoners

31. H2 E LINK TO POLICY CHANGE Proposed amendment speaks for itself.

User: Carshalton-on-the-Hill Residents' Association

Policy H2D

We strongly object to some of the small housing development policies, particularly those concerned with residential conversions.

Para 1 ‘Infill development on vacant or underused sites’. The word ‘underused’ is dangerously vague and could involve councils in endless arguments and litigation. **The word 'underused' should be removed**.

Para 2c ‘The demolition and redevelopment of existing buildings’. This implies the demolition of family houses and their replacement by flats. In the context of LB Sutton, family houses are a vital and necessary part of the social mix and their loss would be a retrograde step. **Para 2c should be removed**.

Para 2d ‘Infill development within the curtilage of a house’. This implies building in back gardens, another retrograde step and one where there is a presumption against approval in the recently-approved (February 2018) Sutton Local Plan. **Para 2d should be removed.**

User: Cold Blow Crescent Residents Association

The increase in housing target four-fold generally (from 446 to 1,245) & eight-fold around town centres and near to stations (from 110 to 865) ts ridiculously high level, we already have flats and houses built on every plot of land, Bexley Village for example has been spoilt wtth squeezed In properties everywhere, already prior to this traffic was slow moving through the village now it is even worse.

I hope that Bexley Council oppose these plans as much as possible already with people being able to destroy perfectly good building and tum them into much larger ones without even trying to make them look like other properties in roads is denting the fabric and charm of the Borough on a mass scale.

You wlll note below that I am also objecting to the constant demolition of bungalows to be replaced by houses as a poor way of moving forward and Ireiterate that to have the planned increase in building being put forward by London Mayor on top of what is already happening is only going to tum Bexley into an urban overcrowded place like many inner London Boroughs with high pollution.

User: Frank Harding

First, Policy H2. This imposes a new “presumption in favour” of small-scale development of between 1 and 25 homes, including demolition and rebuild schemes, the upward extension of flats and residential extensions. This policy should not apply to conservation areas. Hampstead has suffered from numerous planning applications in recent years where developers have tried to demolish existing properties and replace them with completely inappropriate new housing within our conservation area, e.g. 28 Redington Road, 29 New End, 192 Haverstock Hill, 266-270 Finchley Road. New buildings on those sites would have been detrimental to the immediate neighbourhoods and not in accordance with national and local planning policy.

Weakening the protection given to our conservation areas will lead to more of these applications being approved, destroying over time the special character of Hampstead.

User: Regeneration X

Policy H1 Housing
We object to the definition of brownfield being extended to existing housing areas and their gardens. This is the effect of the housing policy as proposed.
We also object to the presumption in favour of development on small housing sites (1 – 25 units), and on the intensification within and close to town centres and stations. The emphasis on development of existing housing sites in and around town centres and stations especially in outer London is not supported in outer London and to have this policy in the London Plan is inviting community friction.
The proposals to intensify the suburbs are dangerous. What will prevent developers slowly buying up semis and terraced homes, leaving them empty or letting them out as HMOs until they own enough to start developing? What will be done to prevent the very real danger of development blight?

User: Julia Palca

First, Policy H2. This imposes a new “presumption in favour” of small?scale development of between 1 and 25 homes including demolition and rebuild schemes, the
upwards extension of flats and residential extensions. This policy should not apply to Conservation Areas. Our area has suffered from numerous planning applications in recent years where developers have tried to demolish existing properties and rebuild them with completely inappropriate new housing within our conservation area [give examples: e.g. 28 Redington Road, 29 New End, 192 Haverstock Hill, 266?270 Finchley Road, and the impact this has had or would have had].
Weakening the protection given to our conservation areas will led to more of these applications being approved, destroying over time the special character of our area.

User: Julia Palca

4. This policy is inconsistent with the NPPF, and therefore unsound. It provides a “presumption in favour” of small housing development of between 1 and 25 homes for development including conversions, extensions and demolition?and?rebuild schemes within 800m of a tube station, rail station or town centre boundary. As shown by the map at Figure 4.3 of the Draft London Plan, this would include vast swathes of Camden (and indeed, most of Central London).

5. Under the Draft London Plan, such development should be approved if in accordance with a Design Code (see Policy H2(E)). Where there is no such design code, as is the case in Camden, “the presumption means approving small housing development unless it can be demonstrated that the development would give rise to an unacceptable level of harm to residential privacy, designated heritage assets, biodiversity or a safeguarded land use that outweighs the benefits of additional housing provision.” The presumption does not apply to statutory listed buildings, but does apply to development within their setting. It applies to development within a conservation area.

6. The policy is inconsistent with national planning policy and legislation for the following reasons:

7. First, section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (“the 1990 Act”) protects not just listed buildings themselves, but also development within the setting of a listed building. It is given effect through paragraphs 128?134 of the NPPF. Where development within the setting of a listed building would cause harm to its significance, “the NPPF creates a strong presumption against the grant of planning permission…requiring particularly strong countervailing factors to be identified before it can be treated as overridden”: see R (Lady Hart of Chiltern) v Babergh District Council [2014] EWHC 3261 (Admin). This is reflected in paragraph 134 of the NPPF which only permits development resulting in harm to a listed building (including through development within its setting) where the public benefits of the proposal outweigh the heritage harm.

8. The Draft London Plan is inconsistent with section 66 as it establishes the opposite presumption where development is within the setting of a listed building: requiring the heritage (and other) harm to outweigh the benefits of the proposal. Legislation and national planning policy requires the reverse: for the benefits of the proposal to clearly outweigh the heritage harm. Therefore, as written, the policy is inconsistent with national planning policy. It should be amended to make clear at Policy H2(F)(i) that the presumption does not apply to development within the setting of a listed building.

9. Second, the Policy applies within conservation areas (even where harm is caused to the conservation area). This obviously contrary to legislation and the NPPF for the same reasons. Section 72 of the 1990 imposes the same duty as section 66 but in respect of development within a conservation area. Paragraph 134 imposes the same presumption against development that causes harm to the conservation area, and requires this to be outweighed by the public benefits of the proposal. Again, Policy H2 of the Draft London Plan imposes a reverse presumption in favour of development causing harm to a conservation area, and is therefore inconsistent with National Planning Policy. Policy H2F should be amended to exclude all development within a Conservation Area.

10. Third, there is no requirement for the Design Codes referred to in Policy H2B(2) to be designed to preserve and enhance the character and appearance of conservation areas. This requirement must be expressly written into the policy to ensure that development, causing harm to the Conservation Area, is not automatically presumed to be acceptable under Policy H2(E) once Camden adopts its design codes.

11. For all of these reasons, Policy H2 is unsound.

User: The Heath and Hampstead Society

Parts of Policy H2, unless amended, could have a disastrous effect on most Conservation Areas though, of course, we are particularly concerned about those in Hampstead.

The objectives of Policy H2, to encourage housing infill and development are laudable – though in Hampstead there is so much money to be made by developers they need little encouragement in producing luxury housing for the rich.

What could be disastrous is policy H2- clause D - which states that there should be a **`presumption in favour of development`** of all such applications which provide more dwellings and which involve:

- `the demolition and redevelopment of existing buildings` - H2, D clause 2c, and
- `upward development`- H2, D clause 3.

We consider that **clause 2)c and clause 3) should be omitted entirely** – together with the **omission of a `presumption in favour`** of **any** development but particularly development in Conservation Areas.

We are aware that clause 4.2.7 mentions Conservation Areas but this gives little protection – we have noted over the past few years that all applicants and their barristers will state that their proposal `enhances` and, if more dwellings result, Inspectors will usually decide in favour of demolition new building.

We have found it very difficult in the past to save structurally sound buildings which `Contribute to the Conservation Area` from demolition and some areas have been devastated by gradual demolition when in many cases conversion of an existing building rather than demolition would provide an increase in dwelling numbers.

Of course most developers will prefer to knock down a building, build a basement more easily, and save 20% VAT.

We have discussed this problem with Camden Planning Department who, we understand, are considering ways in which the gradual demolition, one by one, and consequent loss of a Conservation Area of might be curtailed or at least reduced.

It should be noted that another part of the draft London Plan (and of Camden`s Local Plan) stresses the importance to the environment of adapting, amending and re-using a building whenever possible rather than the extra carbon use ,etc involved in demolishing and re-building.

User: David Callow

Paragraph 4.2.9. I support the principle of “no net loss of overall green cover” as a result of small housing developments, and support “off-site provision such as new street trees” in order to achieve this principle. I recommend an addition (in CAPS) to the following sentence: "Loss of existing biodiversity OR GREEN SPACE, as a result of small housing developments, should be mitigated through measures such as the installation of green roofs, the provision of landscaping that facilitates sustainable urban drainage, or off-site provision such as new street trees in order to achieve the principle of no net loss of overall green cover. Rainwater attenuation features should be incorporated to achieve greenfield run off rates. LOSS OF ANY PUBLIC GREEN SPACE WILL BE COMPENSATED FOR WITH ALTERNATIVE ACCESSIBLE SITES.”

User: David Tannahill

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User: Elisabeth Rolls

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User: Adrian Malcolm Darley

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User: Joy Brown

Policy H2 Small sites C2). Is this a stealth way of reclassifying gardens as brownfield? In my own area I have known tracts of residential garden to be left overgrown and then claimed as “vacant” when someone wanted to make a fast buck and build or sell on.

D2 d) with its mention of building “within the curtilage of a house” also looks as if it is targeting gardens which the government reclassified from “brownfield” (ie previously developed) to “greenfield” on 9 June 2012. There needs to be a much clearer explanation of the Small Sites proposals as even the Glossary definition of “previously developed land” introduces anomalies.

User: Agnes Byrne

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User: Alan Jacobs

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User: Alan James North

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User: Pat Turnbull

Policy H2 Small sites

References to off-site contributions of 'affordable' (replace with social rented) housing should be deleted. All developments however small should include a proportionate amount of social rented housing based on the needs identified in 1.4.3. See below – and cash in lieu is no use as the borough then has to identify yet another site to put the housing on.

H Boroughs wishing to apply affordable housing requirements to sites capable of delivering ten units or fewer …should only require this through a tariff approach to off-site contributions rather than seeking on-site contributions…

Table 4.2

10 year targets …for net housing contributions on small sites…

4.2.12. As demonstrated by the 2017 SHMA, London has significant unmet need for affordable housing …boroughs should be capable of securing cash in lieu contributions for affordable housing contributions from such sites …

User: Miss Louise Barton

Policy H1 -2. undermines the enlightened approach taken by the Mayor's Environment Stratergy as it opens up the possibility of garden "grabbing" within the vicinity of railways and tube stations. Longer term the policy has deeply worrying adverse consequences for gardens throughout London as it implies that once this 800m halo of gardens around infrastructure is sussessfully exploited by developers, the radius will be extended again and again through successive London Plans until all the gardens in London are developed. Gardens are an important component of green infrastructure - contributing to biodiversity, human well being, flood prevention and cleaner air. It is vital that they are preserved

User: Kathy Clauss

Policy H2. This policy should not apply to Conservation Areas. Our area has suffered from numerous planning applications in recent years where developers have tried to
demolish existing properties and rebuild them with completely inappropriate new housing within our conservation area [give examples: e.g. 28 Redington Road, 29 New End, 192 Haverstock Hill, 266?270 Finchley Road, and the impact this has had or would have had]. Weakening the protection given to our conservation areas will led to
more of these applications being approved, destroying over time the special character of our area.

User: Knoll Residents’ Association

Policy H2 D says boroughs should presume in favour of small developments within 800m of a transport hub or town centre. The target for small site development has tripled for LBB. The policy suggests this target should be met partly by increasing the density of existing residential areas ? through the demolition and redevelopment of existing buildings and infill development within the curtilage. The KRA believes this will encourage a huge increase in the demolition of substantial family homes in order to replace them with much smaller houses or blocks of flats. There is only limited capacity for increasing the density of suburban areas without damaging the character or appearance of the local area. Rather than a blanket ruling LBB should be able to decide what is appropriate so that due consideration can be given to the long term effects on the community. The DLP does not include any targets for family homes.

User: Christine Elsdale

I support the principle of “no net loss of overall green cover” as a result of small housing developments, and support “off-site provision such as new street trees” in order to achieve this principle.

I recommend an addition (in CAPS) to the following sentence: "Loss of existing biodiversity OR GREEN SPACE, as a result of small housing developments, should be mitigated through measures such as the installation of green roofs, the provision of landscaping that facilitates sustainable urban drainage, or off-site provision such as new street trees in order to achieve the principle of no net loss of overall green cover.

User: Louise Chatterton

First, Policy H2. This imposes a new “presumption in favour” of small?scale development of between 1 and 25 homes including demolition and rebuild schemes, the upwards extension of flats and residential extensions. This policy should not apply to Conservation Areas. Our area has suffered from numerous planning applications in recent years where developers have tried to demolish existing properties and rebuild them with completely inappropriate new housing within our conservation area [give examples: e.g. 28 Redington Road, 29 New End, 192 Haverstock Hill, 266?270 Finchley Road, and the impact this has had or would have had].

Weakening the protection given to our conservation areas will led to more of these applications being approved, destroying over time the special character of our area.

User: Mr Mark Davison

First, Policy H2. This imposes a new “presumption in favour” of small-scale development of between 1 and 25 homes including demolition and rebuild schemes, the upwards extension of flats and residential extensions. This policy should not apply to Conservation Areas. Our area has suffered from numerous planning applications in recent years where developers have tried to demolish existing properties and rebuild them with completely inappropriate new housing within our conservation area [give examples: e.g. 28 Redington Road, 29 New End, 192 Haverstock Hill, 266-270 Finchley Road, and the impact this has
had or would have had].

Weakening the protection given to our conservation areas will led to more of these applications being approved, destroying over time the special character of our area.

User:	Fenella Barton

I support the principle of “no net loss of overall green cover” as a result of small housing developments, and support “off-site provision such as new street trees” in order to achieve this principle. I recommend an addition (in CAPS) to the following sentence: "Loss of existing biodiversity OR GREEN SPACE, as a result of small housing developments, should be mitigated through measures such as the installation of green roofs, the provision of landscaping that facilitates sustainable urban drainage, or off-site provision such as new street trees in order to achieve the principle of no net loss of overall green cover. Rainwater attenuation features should be incorporated to achieve greenfield run off rates. LOSS OF ANY PUBLIC GREEN SPACE WILL BE COMPENSATED FOR WITH ALTERNATIVE ACCESSIBLE SITES.”

User: Richard Ferraro

This imposes a new “presumption in favour” of small?scale development of between 1 and 25 homes; including demolition and rebuild schemes, the upward extension of buildings containing flats, and residential extensions. This policy should **not** apply to Conservation Areas. Many Conservation Areas in London (and elsewhere) have suffered in recent years from aggressive commercial Planning Applications; frequently driven by aggressive commercial Planning Consultants. In such cases, and in ruthless pursuit of profit in higher value areas, developers seek to demolish existing properties in Conservation Areas, and rebuild them with inappropriate new housing at higher density. In many cases, these proposals are not in keeping with the principles and details of the Conservation Area Statements that apply.

In my professional experience, the volume and frequency of such planning applications has increased over the last 15 years. Inappropriate proposals of this type are ever more difficult for local communities to fight, where necessary, in order to defend the principles and positive character of Conservation Areas.

Weakening the protection given to Conservation Areas will lead to more of these aggressive and inappropriate planning applications being approved, destroying over time the special character that local communities rightly seek to preserve in Conservation Areas.

User:	Joan Anne Hepworth

Paragraph 4.2.9 any loss of green cover as a result of housing developments must be compensated for by off-site provision of trees or green space. This might includ green roofs, landscaping to ensure adequate urban drainage or street trees.

User: St Anne's Redevelopment Trust

- We welcome the inclusion of community-led housing in the Plan (at 4.2.10) but would have liked to have seen detail on how community-led housing will be enabled, especially in view of the Mayor’s declared commitment to 1000 community-led homes.
- We should like to see highlighted the potential for community-led housing to address social isolation and health inequalities.

User: William Lucy

Paragraph 4.2.9 **Support** the principle of “no net loss of overall green cover” as a result of small housing developments, and support “off-site provision such as new street trees” in order to achieve this principle.

Recommend an addition (in red) to the following sentence: “Loss of existing biodiversity or green space, as a result of small housing developments, should be mitigated through measures such as the installation of green roofs, the provision of landscaping that facilitates sustainable urban drainage, or off-site provision such as new street trees in order to achieve the principle of no net loss of overall green cover. Rainwater attenuation features should be incorporated to achieve greenfield run off rates. Loss of any public green space will be compensated for with alternative accessible sites.”

User: Cllr Caroline Newton

The removal of the ban on back land development will see residential provision packed tight, and with a presumption in favour of small housing developments (up to 25 units) this will end up with the loss of green space. Towns in Bexley originated around railway stations – the family homes that were built in the 1930s are close to town centres and the railways. GLA planners believe that small flats, converted from three bedroom semi detached houses, are suitable family homes. This means streets and streets of semi-detached housing can be converted into – or knocked down and built on for – flats. One street I am Councillor for has seen applications (rejected) for such conversions – meaning the number of dwellings would increase from c170 (approx. 500 to 600 residents) to between 300 to potentially 1000 or more dwellings.

It will change completely the face of the areas around towns and railway stations and will remove badly needed green spaces (gardens). Despite the reassurances of GLA planners, this will not be a piecemeal process given the significant numbers of new housing demanded. However, it WILL be a hotchpotch of developments – and neighbourly contention - without a joined-up plan and using spaces in need of regeneration (as opposed to a couple of good quality houses which can be brought for less than £1 million, knocked down and 25 flats put up). A joined-up plan takes more effort but for the sake of getting it right, the Mayor and GLA team need to be obliged to put the local situation over easy wins resulting in massive change in the local amenity.

Families stay, indeed move, to Bexley for good quality family housing. Removing this choice for Londoners will result in a monotonous, uniform London rather than providing the variety of housing Londoners want and the unique, interesting communities the Mayor seeks to achieve.

User: Cllr Louie French

2) The housing target in Bexley has been increased nearly three-fold, from 446 units a year to 1,245 with NO additional infrastructure promised. Bexley does not have any underground tube stations or DLR. There is also no additional funding allocated for public amenities such as schools or hospitals. The amount of housing coming from small sites has increased from around 110 sites to 865, the highest increase as a % of total supply in London. These small sites will be predominantly in residential areas up to 800m from town centre boundaries and railway stations which in Bexley will include areas with relatively poor accessibility. Clear overdevelopment that is not in keeping with the local environment - both material planning considerations.

3) Timing issue. If these plans are approved, then the already loose planning laws become even more so from day one. This means little local control to allow for sustainable devlopment. The plan contains lots of window dressing, but the social and transport infrastructure required to support the additional housing would take 10-20 years at least to be delivered and there are no guarantees of it coming. This will mean that it will be extremely difficult for residents and businesses to travel without private transport and would result in increased pollution from vehicle travel - a clear contradiction to your other goals.

5) The removal of the ban on back land development which will see residential packed tight and with a presumption in favour of small housing developments (up to 25 units) this will end up with the loss of green space. It will also have a negative impact on local wildlife.

User:	Save Swiss Cottage

3. To facilitate the housing targets, there is to be presumption in favour of small housing schemes (between 1 and 25 homes) on sites that are within 800 meters of a Tube Station (i.e. more than half of London) regardless of whether the proposal involves the demolition of a building making a positive contribution in a Conservation Area. There is an exemption for listed buildings, but the exemption doesn’t apply to a listed building’s setting.

User: L&Q

To achieve the twin objectives of i) encouraging development to come forward and ii) be granted planning permission efficiently the draft London Plan should address the following overarching points:

1. The London Plan should provide a presumption in favour of all residential development2 – There are concerns that housing need is underestimated, housing supply is overestimated and that housing delivery rates may be unachievable. Moreover, the supply of new homes identified in the draft London Plan is reliant upon ‘substantially… increasing the rate of housing delivery from small housing sites’ (paragraph 4.2.1). Whilst delivery from ‘small sites’ may be a ‘strategic priority’ (ibid), the referral criteria will almost always preclude the Mayor from directing the development of any new homes at such locations (or indeed many schemes smaller than 150 homes). This all requires honing in on how the detail of the Plan can be refined to deliver as many homes as feasible. Given the scale of London’s housing crisis the draft London Plan must emphasise that the delivery of new homes should be afforded significant weight when determining planning applications. In this context, the presumption in favour of residential development from some (but not all) ‘small sites’ should be universally extended to all sites. A presumption is important because it will elevate this matter as a planning consideration for the decision-maker.

User: Keith Saunders

The importànce of trees and woodlands cannot be emphasised enough. They improve air quality, provide vital habitat for wildlife, much of which is disappearing from urban areas and aesthetically they help to brea? up views of endless buildings. Also, people feel better and more relaxed in wooded areas. I work as a conservation volunteer and any time spent in woodland makes me feel better in myself.

In the sections listed below (in the same order as they appear in the draft London Plan).

- Paragraph 1.3.3. Recommend an addition (in CAPS) to the following sentence: “Access to green and open spaces, including waterways AND TREES, can improve health, but access varies widely across the city.”
- Paragraph 3.9.5. I support the inclusion of “Protection for trees” as an issue in the amplification of potential negative impacts of large-scale basement development beneath existing buildings.
- Policy H1. Increasing housing supply. I recommend that Sentence B2)d is clarified so that “public sector owned sites” will not include woodland, parks and open spaces.
- Paragraph 4.2.9. I support the principle of “no net loss of overall green cover” as a result of small housing developments, and support “off-site provision such as new street trees” in order to achieve this principle. I recommend an addition (in CAPS) to the following sentence: "Loss of existing biodiversity OR GREEN SPACE, as a result of small housing developments, should be mitigated through measures such as the installation of green roofs, the provision of landscaping that facilitates sustainable urban drainage, or off-site provision such as new street trees in order to achieve the principle of no net loss of overall green cover. Rainwater attenuation features should be incorporated to achieve greenfield run off rates. LOSS OF ANY PUBLIC GREEN SPACE WILL BE COMPENSATED FOR WITH ALTERNATIVE ACCESSIBLE SITES.”
- Policy S4. Play and informal recreation. I support section B2)d, that residential development proposals for schemes that are likely to be used by children and young people should incorporate good-quality, accessible play provision for all ages, of at least 10 square metres per child that: “incorporates trees and/or other forms of greenery”.
- Policy G1. Green infrastructure. I support this policy, and subsequent narrative that mentions the important role of trees.
- Policy G5. Urban greening. I support this policy, including the recommended Urban Green Space Factor, and subsequent narrative that mentions the important role of trees. I support the inclusion of the role and weighting for woodland and trees in Table 8.2 - Urban Greening Factors. I recommend including a reference to Residential Development and Trees (Woodland Trust, 2015, woodlandtrust.org.uk/residentialdevelopments).
- Policy G6. Biodiversity and access to nature. I support this policy. I recommend that Sites of Metropolitan Importance and all ancient woodlands are added to the categories of planning applications that must be referred to the Mayor.
- Policy G7. Trees and woodlands. I support this policy. I recommend that Section B)1 is strengthened as follows (amendments in CAPS): “GIVE THE STRONGEST POSSIBLE protectION TO ‘veteran’ trees and ancient woodland, ESPECIALLY where these are not already part of a protected site”. I support the subsequent narrative on the role of trees, particularly paragraphs 8.71 – 8.73. I recommend referring London boroughs to guidance on ancient woodland and veteran trees: Planners’ manual for ancient woodland and veteran trees(Woodland Trust, 2017, woodlandtrust.org.uk/plannersmanual).

Please accept this my formal response to the consultation. I will look forward to hearing from you as the Plan progresss.

User:	Eastcote and East Ruislip Branch of the Ruislip-Northwood Conservative Association

? The Mayor's approach to small site development has the potential to destroy much of the suburban character in outer London through inappropriate development. This is an unacceptable outcome of a policy that will fail to deliver growth in a sustainable manner.

User: Primrose Hill Conservation Area Advisory Committee

D2 A7 We welcome this clause.

D2 D Design Codes General 1: we are concerned by the reference to Design Codes and their effectiveness. There must be concern that the NPPF's statement (36) that design codes should 'avoid overly prescriptive detail' may make them an inadequate mechanism for managing density **(D6)** in complex and sensitive heritage areas. See also policy **H2 B 2.**

General 2: We are also very concerned over who prepares Design Codes. They need to be undertaken transparently in collaboration with local communities to be consistent with the Mayor's objectives.

Our proposed amendments – reasoning: To achieve effective policy implementation, and consistency with the Mayor's objective of working collaboratively with local communities.

Our proposed revised text: to ADD 'Design Codes should be prepared by Boroughs transparently and in collaboration with local communities, respecting local distinctiveness, and preserving and enhancing heritage assets.'

D2 G 4 Draft policy: 'design review recommendations are appropriately recorded and communicated to officers and decision makers'

Our proposed amendments – reasoning: to ensure consistency with the requirement for transparency at D2 G 1. Our experience is that, while design review is welcome, it lacks transparency, and is not open to scrutiny. Our amendment seeks to address both the means of better achieving high quality design, and the need to build trust in democracy.

Our proposed revised text: 'design review recommendations are appropriately recorded and communicated to officers and decision makers, and made public for scrutiny in good time before officers' recommendations are prepared.'

User:	Primrose Hill Conservation Area Advisory Committee

Our proposed amendments – reasoning: In respect of both our proposed amendments we note the statement at para 4.2.7, that ‘Special attention will be required within conservation areas to ensure that increased housing provision is accommodated in a way that also complements and enhances an area, taking into account conservation area character appraisals and management plans.’ We seek to incorporate this intention into policy. We also seek to ensure that the revised policy is consistent within the Plan, and with both national legislation, which recognizes that conservation areas have been assessed as areas the character and appearance of which it is desirable to preserve or enhance, and the NPPF.

User:	Primrose Hill Conservation Area Advisory Committee

H2 E Draft policy: '… the presumption means approving small housing development unless it can be demonstrated that the development would give rise to an unacceptable level of harm to residential privacy, designated heritage assets, biodiversity or a safeguarded land use that outweighs the benefits of additional housing provision.'

Our proposed revised text: '… the presumption means approving small housing development unless it can be demonstrated that the development would give rise to an unacceptable level of harm to residential privacy amenity, designated heritage assets, biodiversity or a safeguarded land use that outweighs the benefits of additional housing provision.'

H 2 F 1) Draft policy: 'The presumption in favour of small housing developments should not be applied to: 1) statutory listed buildings …'

Our proposed revised text: 'The presumption in favour of small housing developments should not be applied to: 1) statutory listed buildings, registered gardens, buildings which make a positive contribution to conservation areas, and the settings of these buildings.'

User: Nina Glass

This imposes a new "presumption in favour" of small scale development of between 1 and 25 homes. This includes demolition and rebuild schemes, the upwards extension of flats and residential extensions.

This policy indeed should not apply to Conservation Areas.

Over recent years we have, in Hampstead and surrounds, suffered from numerous planning applications where developers have tried to demolish existing properties and rebuild them with inappropriate new housing within the conservation area. These include, but are not limited to, 29 New End, 28 Redington Road, 192 Haverstock Hill, 266-270 Finchley Road.

Weakening the protection given to conservation areas leads to more of these aforementioned sort of applications being approved. This will impact the area - its special character - and is counter conservation protection itself.

User: Shari Donnenfeld

First, Policy H2. This imposes a new “presumption in favour” of small-scale development of between 1 and 25 homes including demolition and rebuild schemes, the upwards extension of flats and residential extensions. This policy should not apply to Conservation Areas. Our area has suffered from numerous planning applications in recent years where developers have tried to demolish existing properties and rebuild them with completely inappropriate new housing within our conservation area [give examples: e.g. 28 Redington Road, 29 New End, 192 Haverstock Hill, 266-270 Finchley Road, and the impact this has had or would have had].

Weakening the protection given to our conservation areas will led to more of these applications being approved, destroying over time the special character of our area.

User: Carole Destre

Making London greener is essential for people’s health and wellbeing. Yet many local green spaces face pressure from new development. The Plan must recognise that loss of green space cannot always be made up for through green roofs and sustainable drainage schemes, valuable though these features are (para 4.2.9). Policy should make clear that provision of and access to green space should always be considered when planning new development. And I mean proper green space, not a tiny 'playground' (as per the one on the Royal Arsenal Riverside development, which is as large as a handkerchief with its three apparatus, just to tick the box 'playground! It is a shame on the developer and the council to have approved this).

User:	David Scott

I welcome the reference to urban greening in Policy D7 Public Realm. This should include a broader commitment to, and requirement for, conserving and restoring urban nature rather than the current common approach to installing trees in concrete or tubs and planting of low nature value.

User: Helen Newman

Making London greener is essential for people’s health and wellbeing. Yet many local green spaces face pressure from new development. The Plan must recognise that loss of green space cannot always be made up for through green roofs and sustainable drainage schemes, valuable though these features are (para 4.2.9). Policy should make clear that provision of and access to green space should always be considered when planning new development. It is well documented that green spaces help our mental health so any new accommodation should be reflected with adequate green space. Flats could be told to include balconies for plants and I have seen some with plants already potted into the structure. London is a great city if cutting edge artists and engineers, when don’t you use these expertise to create ground breaking green spaces. Spaces that inspire the next generation. Who will, we hope and plan and fight and recycle and reuse, breathe cleaner air, live longer, have children with fewer breathing problems, utilise the renewable energy you installed. What a legacy, Sadiq Khan, who inspired London and the world to think greener, outside the box.

User: Regent's Park Conservation Areas Advisory Committees

Chapter 4 Housing

General: We acknowledge the very serious nature of the housing crisis in London, and welcome effective proposals to address it. We would seek to contribute to a plan which would address the problem by establishing means by which communities would welcome new housing, rather than oppose it. We fear that the Draft Plan increases opportunities for conflict, thereby decreasing the likelihood of effective implementation within a reasonable timescale. We, again, see working collaboratively with communities, and respecting local distinctiveness and heritage assets as key to successful implementation.

Our proposed amendments – reasoning: In respect of both our proposed amendments we note the statement at para 4.2.7, that 'Special attention will be required within conservation areas to ensure that increased housing provision is accommodated in a way that also complements and enhances an area, taking into account conservation area character appraisals and management plans.' We seek to incorporate this intention into policy. We also seek to ensure that the revised policy is consistent within the Plan, and with both national legislation, which recognizes that conservation areas have been assessed as areas the character and appearance of which it is desirable to preserve or enhance, and the NPPF.

H2 E Draft policy: '… the presumption means approving small housing development unless it can be demonstrated that the development would give rise to an unacceptable level of harm to residential privacy, designated heritage assets, biodiversity or a safeguarded land use that outweighs the benefits of additional housing provision.'

Our proposed revised text: '… the presumption means approving small housing development unless it can be demonstrated that the development would give rise to an unacceptable level of harm to residential ~~privacy~~ amenity, ~~designated~~ heritage assets, biodiversity or a safeguarded land use that outweighs the benefits of additional housing provision.'

H 2 F 1) Draft policy: 'The presumption in favour of small housing developments should not be applied to: 1) statutory listed buildings …'

Our proposed revised text: 'The presumption in favour of small housing developments should not be applied to: 1) statutory listed buildings, registered gardens, buildings which make a positive contribution to conservation areas, and the settings of these buildings.'

Policy H3 Monitoring housing targets

User: Taylor Wimpey UK

Policy H3 Monitoring housing targets.

Parts C and D state that net non-self contained accommodation for older people (C2 use Class) and Student Accommodation (on a ratio of 3:1) should count towards meeting housing targets.

Whilst NPPG indicates the above approach may be acceptable, there must be no double counting.

Para 4. 3.3

It is the Mayor's view that the Government's proposed Housing delivery test should not unfairly penalise boroughs where housing delivery has been constrained.

We do not feel that London Boroughs should be given any special dispensation regarding the delivery test. Many authorities across the Country also face significant constraints and housing pressures.

Authorities are encouraged to bring forward sites that are deliverable throughout the plan period rather than relying on a small number of major sites that are unlikely to deliver homes until well into the plan period. Whilst major sites are extremely important in their contribution to the overall supply, a range of sites are required to help address the immediate housing crisis.

Given London's housing target is for the first 10 years of the plan, it is vital that sufficient deliverable sites are identified as early as possible, plus a buffer to help achieve its delivery target and maintain a 5 yr housing land supply.

User:	Elephant Amenity Network

3.1 We propose :
• monitoring of homes lost through demolition (section A) should occur when demolition takes place. The current practice of not taking loss through demolition into account until new homes have been delivered means that net housing data in the London Plan Monitoring Reports is incorrect much of the time;
• additional social rented homes should be monitored separately from London Affordable Rent homes;
3
• benchmark targets for student housing (section C) should be set for each borough, along with a requirement to cap delivery above targets set, particularly in parts of London where too much ‘studentification’ has occurred;
• benchmark targets should be set for self-contained older people’s housing, also set out in forms of tenure, (section D) and also for care homes.

User:	Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living

H3 (159)- Monitoring Requirements

There should be an explicit requirement here that older person's housing delivery is monitored on a borough by borough level and by tenure provided.

This should also be measured by type of older persons housing. This information is currently seriously lacking.

Objection: This policy is not positively prepared, nor effective as London has historically under-delivered older persons' housing. We respectfully request that it should be amended.

User: Urbanissta

Policy H3 Monitoring Housing Targets

H3 highlights that the housing targets will be monitored to take into account homes lost through change of use and demolition.

Comment: The policy needs to be refined to set out how often the reviews will take place and whether the information gathered from the reviewed will be published.

User: London Borough of Camden

The Council generally supports the parameters for monitoring housing targets set out in Policy H3, but is concerned that the requirements of Criterion B could cause confusion in the case of mixed use schemes.

The Council proposes that Criterion B should either be amended to refer to "all sites that deliver between 1 and 25 additional homes, including mixed use schemes should contribute towards..." (removing the reference to 0.25 hectares),

or state that "delivery on housing and mixed-use development sites of less than 0.25 hectares should contribute towards...".

The Council welcomes the encouragement included in paragraph 4.2.11 for boroughs to resist the amalgamation of flats where this is causing the sustained loss of homes. We note that in the case of larger blocks, the amalgamations involving small changes to the overall number of homes may not constitute development. However, for consistency, the Council proposes that Criterion A in Policy H3 should refer to "taking into account homes lost through demolition, amalgamation or change of use".

User:	Catalyst Housing Limited
Counting delivery from student housing or shared living schemes The current draft London Plan policy states '*Net non-self-contained accommodation for students and shared living schemes should count towards meeting housing targets on the basis of a 3:1 ratio, with three bedrooms being counted as a single home.'* Such development is currently counted on a 1:1 basis (i.e. each student room is equivalent to a Class C3 1 bed - 1 person (1b1p) studio home).	

There is a logic to the current approach in that in practice each person occupying their own space is in essence a household. If they wanted to live together with a partner, family members or others then they could. The perverse outcome of the approach outlined in the draft London Plan is that monitoring reports would effectively be undercounting delivery for alternative forms of accommodation. This is especially peculiar given 1b1p studios will still be counted on a 1:1 basis when the number of people actually being housed is identical.
The current approach should be maintained and such accommodation counted on a 1:1 basis.

User: 4 Estates Forum

Concerns over London Plan taking precedent over Local Plans

London Plan policies, (including housing targets), take precedence over Local Plans and other matters. Draft London Plan housing targets are seen as a requirement for councils to meet in delivery of new units. In the past the perceived failure to meet targets was often used by Boris Johnson as a reason to take planning decisions away from local authorities, including two on the Isle of Dogs, against the will of the council.

The 4EF is concerned the draft London Plan or the unpublished OAPF breach planning principles by effectively setting Tower Hamlets a housing target for the Isle of Dogs and South Poplar, that isn't deliverable without demolitions of estates or parts of estates.

The 4EF suggests the principal should be maintained that any estimation of new housing units should be reasonably made and delivered in consultation with local boroughs.

The 4EF is very concerned about the significant difference in housing targets set out in the draft London Plan and TH's Local plan for IoD&SP Opportunity Area.

Housing targets in the draft London Plan vs Tower Hamlets Local Plan

The draft London Plan specifies a housing target for net additional units for all Opportunity Areas (OA), including the Isle of Dogs and South Poplar (IOD&SP).

Although the Opportunity Area Planning Framework (OAPF) has not been published, we must assume that the draft London Plan incorporates a housing target for the IOD&SP based on the OAPF's target.

? The Draft London Plan's housing target for our OA is 29,000 from 2019-2029, averaging 2,900 per year

? Tower Hamlets Draft Local Plan housing target for the same Opportunity Area – is 30,601 but this is over 15 years, from 2016-2031, an average of 2,040/year.

The 4EF concern is that the GLA’s draft London Plan assumes a much higher rate of growth than TH Local Plan, that this growth is assumed by GLA to be delivered over the small IoD&SPOA, drastically changing the new unit capacity of the designated sites over what was estimated in TH Local Plan. The alternative would be that the GLA is assuming new sites, yet undisclosed and not thus far designated in TH Local Plan1. The 4EF is concerned

of units will be built. Most have either already been completed (1,625 in 2016/17); are under-development (12,846); or have planning permission (4,831); This makes 14’471 units already delivered / in progress which wouldn’t be counted toward 2019-2029 London Plan.

Thus, the difference between GLA’s London Plan of 29’000 units in 2019-2029 **and TH Local Plan** still to be built on 13 large brownfield allocated sites (9,561) mostly before 2029 **seems to be 20’000 units.**

Another way of looking at GLA and TH target difference would be

? Draft London Plan (2019-2029): 29,000, an average of 2,900/year

? LBTH Local Plan: 30,601 (2016-2031): an average of 2,040/year, some of the development is already in progress, and will have already been built before the London Plan takes effect in 2019. Some are expected to be delivered in 2029-31, after the London Plan period.

? Annual difference: the London Plan expects 840 units more units per year; 8,400 over 10 years from 2019-2029.

hat GLA’s London Plan, if approved, may put undue pressure on decision makers in the planning application approval process in the IoD&SPOA for delivery of and the much-inflated housing targets, which can only be achieved via new-build, potentially on existing estate sites.

The 4EF requires the GLA to provide the rational for their targets, especially for the difference with TH Local Plan targets, to mitigate the risk of pre-empting the planning permission process and development site designation process. As GLA officers are aware, there are very few estates in IoD&SP Opportunity Area which have the capacity for large numbers of new units from in-fill.

Change in TH Local Plan aren’t reflected in the GLA draft London Plan

In the Tower Hamlets Draft Local Plan (late 2016) three of our four estates were highlighted as (unexplained) ‘Regeneration Areas’. Residents thought this risked pre-judging any future planning application, because OHG could imply or explicitly argue to a planning committee that redevelopment would be implementing Local Plan policy, making it difficult for councillors to refuse permission, regardless of the quality of consultation, for fear losing or funding any appeal.

Following protests, in the final Local Plan our estates are no longer highlighted as ‘Regeneration Areas.’

Unfortunately, the draft London Plan is giving us déjà vu – see Draft London Plan: Strategic Areas for Regeneration (based on 20 per cent most deprived lower super output areas in England) Figure 2.19 (PDF page 113, and Plan page 95)

This map seems to designate the Barkantine Estate and Samuda Estate as, 'Strategic Areas for Regeneration' based on multiple deprivation. As no explanations are given, the questions residents need answers to are:

? Why are these estates earmarked for ‘regeneration’ when other estates with similar ‘deprivation’ levels are not?

? Are they more deprived than other estates? If so, in what ways? Or is it just because they’re big enough to register in a ‘super-output area?’

? What does, ‘Strategic Area for Regeneration' mean in terms of the policy ‘solutions’ the GLA expects to ‘strategically’ deliver? ‘Regeneration’ is an abused word because it has several possible meanings. Logical policy responses to ‘deprivation’ could be to improve training and employment opportunities, or local services, but in recent years the approach to improving living conditions in ‘deprived areas’ has been to demolish peoples’ homes and price some out of their communities, using the spurious justification that deprivation is caused by housing conditions. This is largely untrue even where housing conditions are poor. Our estates are not ‘sink estates.’ In general, they are in a relatively good state of repair.

User:	Eastcote and East Ruislip Branch of the Ruislip-Northwood Conservative Association

? The proposed housing target for Hillingdon of 1,553 units per annum will not be delivered.

User: London Assembly Green Party Group

MISSING DESIGN POLICIES

Back garden protection

I am concerned at the removal of the current London Plan policy 3.5A, which says: “boroughs may in their LDFs introduce a presumption against development on back gardens or other residential gardens where this can be locally justified.”

Combined with the new presumption in favour of development on small sites, which covers a range of infill and extension developments that could encroach on back gardens (policy H2) I believe we risk losing a lot of quality green space and their flood alleviation, biodiversity, carbon sequestration and air pollution benefits, without appropriate safeguards being in place.

Policy H4 Meanwhile use

User:	mrs caroline cheales
completely support this. there is too much waiting and under utilised space	

User:	mrs caroline cheales
completely support	

User: MS J GELLER

Object -

This amounts to temorary accomodation which people do not like as they do not wish to move from place to place. Better to spend valuable money constructing permanent housing rather than spending money on that which is temporary.

User: QED Sustainable Urban Developments Ltd

Support -

Boroughs are encouraged to identify opportunities for the meanwhile use of sites for housing to make efficient use of land while it is awaiting longer-term development. **Examples of meanwhile use housing within London include:**
Ladywell, Lewisham – 5-year scheme
Marston Court, Ealing – 10-year scheme
Meath Court, Acton – 7-year scheme

4.4.1 Meanwhile uses are a range of temporary uses on land and property awaiting longer-term development. Some vacant land is suitable for meanwhile use as housing**, key criteria for identifying suitable vacant land include:**

- **Access to public transport**
- **Existing services and local amenities**
- **Non-contaminated**

To make efficient use of land that would otherwise be left vacant, boroughs are encouraged to identify sites that are suitable for residential occupation to be used for meanwhile housing including land in both public and private ownership. **The GLA would encourage Boroughs to use temporary change of use planning consents, time limited by condition as a delivery mechanism to enable meanwhile use housing and provide a supplementary planning guidance notice.**

4.4.2 Opportunities for the meanwhile use of land for housing on large-scale phased developments should be identified during the planning process. The meanwhile use of a site must not result in an unacceptable impact on **existing** residential amenity or prevent development sites from being brought forward for development in a timely fashion. Parameters for any meanwhile use, particularly its longevity and associated obligations, should be established from the outset and agreed by all parties. **Should development experience unexpected delay then the GLA encourage boroughs to grant variation of condition to existing temporary consent to continue provision of housing throughout the delay.**

4.4.**3** Meanwhile housing can be provided in the form of **offsite** manufactured homes, **typically using volumetric technology.** This can reduce construction time, **decrease local disruption** and the units can potentially be reused at a later date on another site. **In circumstances where there is an extraordinary need the GLA accept that some flexibility may be required in applying building regulations standards to meanwhile housing.**

4.4.**4** The time period for meanwhile uses will vary with site circumstances. **Meanwhile use, for planning purpose, is generally accepted for periods of up to 10 years.** Boroughs should consider starting the time period for the meanwhile use from the date of occupation rather than the date of planning permission, in order to support the viability and delivery of meanwhile housing developments.

User: QED Sustainable Urban Developments Ltd

Support -

We believe it is worth considering an SPG to assist with regards to space standards and identified housing need.

Meanwhile development is a great tool for addressing an immediate need. These needs vary significantly over the lives of individuals, when specific needs or requirements arise, or when the market drives a need. A one-size fits all approach to space standards will restrict the possibility of meanwhile development. The housing needs being addressed here are subtle and complex, meanwhile housing is about helping people today and while not a long term solution should be viewed as part of a housing pathway towards a long term solution.

We would suggest that the design and approach to standards, such as space standards, should be driven by the circumstance, need and type of accommodation.

User:	Mrs Sarah Witney

In principle I agree with this as long as they do not become the slums of tomorrow

User: Mr Daniel Willis

Support -

In the London Borough of Newham, one in twenty-five people are currently homeless. With this in mind, Community Links welcomes the Mayor's support for "meanwhile use" and applauds the assertion that both public and private landing awaiting development should be used to provide temporary accommodation for the homeless. However, any such accommodation must be of an acceptable standard – our recent research project (in partnership with The Magpie Project) interviewing women in temporary accommodation in Newham has found that, all too often, it is not. We would also encourage the Mayor and the GLA to consider other potential meanwhile uses for public and private land, including the provision of space for civil society and community-led activities. We also encourage the Mayor and GLA to engage with projects such as The Magpie Project to explore how their excellent work can be better supported.

User:	Levitt Bernstein

Meanwhile Housing appears to be Temporary Housing, rebranded. Any temporary housing needs much more quality control than is defined in this policy. Specific standards and timescales are needed to avoid the substandard, permanent pre-fabs of previous eras.

User: Levitt Bernstein

The time period for “meanwhile” homes is too ambiguous and open to abuse - perhaps it should be linked to a particular development and site phasing strategy, or a maximum number of months, with an option to request an extension.

We would also recommend that more detail is provided in this policy in terms of what groups of people it might be suitable for.

We would recommend borough-wide or sub-regional coordination of this type of provision. If prefabricated and moveable, temporary homes could be GLA owned and rented out to boroughs very cheaply. This could also encourage reasonable quality standards.

User: Mr David Trodden

Land lying fallow: this may relate to Policy H4 page 160 **Meanwhile use -** while awaiting longer-term development.

The former site of Earls Court Exhibition Centre has a significant footprint which is likely to lay fallow for some time while the RBKC planning body re-appraises the development of this site. Could we please ensure that this site is meanwhile used for the good of the people of RBKC & surrounding Boroughs for culture, sport and entertainment. It would be a disgrace if a car park or a shipping container park were to be the permitted use in the meantime of this centrally located (adjacent to Earls Court tube) 22 acre site.

User:	Sport England

Object -

Sport England objects to the supporting text in Paragraph 4.4.1. The encouragement of ‘meanwhile uses’ should not be used to allow development on vacant playing fields or in vacant sport buildings, as this could potentially result in these sites being lost thereby conflicting with paragraph 74 of the National Planning Policy Framework.

User:	Trust for London

Support -

Trust for London supports innovative meanwhile use of land, having invested in YMCA South West London’s Y:Cube modular development of homes for young people, as well as an RSA workshop on Temporary Accommodation which highlighted the innovation of Place Ladywell, by the same architects. Future of London has conducted site visits to a number of innovative meanwhile developments and we would encourage local authorities to learn the lessons from their work.

User: The Access Association

Policy H4 Meanwhile Use

4.4.2 “Meanwhile housing can be provided in the form of precision manufactured homes. This can reduce construction time and the units can potentially be reused at a later date on another site.”

Clarification is sought on the definition of “Meanwhile housing”. The implication is that it refers to what were formerly termed as ‘prefab housing’; which remained in used long beyond the temporary term, and in some cases had a detrimental effect on local neighbourhoods.

There is also the possibility that they would not comply with current housing standards, in being step free or sufficient to accommodate disabled people.

How would this fit with the Policy D2 Delivering good design?

User: London Assembly Green Party Group

Neutral -

This is a very short new policy, but its inclusion in the draft new London Plan is very welcome and is something that was suggested in Towards a new London Plan.

The explanatory text in section 4.4.1 includes (in similar wording to the policy for temporary public realm) the provision: “Parameters for any meanwhile use, particularly its longevity and associated obligations, should be established from the outset and agreed by all parties.”

Meanwhile housing may be particularly suitable for housing people who have been homeless and in hostels as ‘move on’ accommodation. Residents in these homes are not usually given secure tenancies or even Assured Shorthold Tenancy terms, but are often given licenses, similar to the terms under which property guardians occupy empty buildings.

Any implementation of this policy should be careful that homes provided are not substandard and that they do not end up being long-term yet insecure homes for large numbers of Londoners.

Recommendation for policy H4

I recommend the Mayor produces further guidance on meanwhile housing and a model, adaptable set of terms and conditions for sites and requires that at least Assured Shorthold Tenancies are offered to potential residents.

User: Ms Meenakshi Sharma

H4

1. Boroughs are encouraged to identify opportunities for the meanwhile use of sites for housing to make efficient use of land while it is awaiting longer-term development.

Meanwhile uses will lead to areas that have been identified for housing in the Local Plan, such as Ilford South, where 15,000 of 17,230 units have been allocated, becoming a place for temporary housing, particularly in our town centres. The effects of the increased population and infrastructure requirements will be ignored. The other areas of the Borough will remain untouched. We will not have any town centres of any substance.

User: MORA - Monks Orchard Residents Association

MORA Comment:
The duration of “meanwhile use” developments should be limited to a prescribed period, otherwise “meanwhile” could extend to “permanent”.

Recommendation:
Define the limiting duration of “meanwhile” to prevent extension to unacceptable durations.

User:	Putney Society
How about using these sites for smaller scale residential developments? Why wait for the big boys?	

User:	Royal Borough of Kensington and Chelsea

4.4 Policy H4 Meanwhile use

This policy would not work in most areas of this borough. The refurbishment / conversion costs of providing short term residential use in many of our historic buildings and the market requirements for a high specification are factors that would work against it. As a result, the short term provision of residential use is rarely viable for developers.

User:	Telford Homes Plc

Telford Homes supports the use of meanwhile uses, but the terms in which this operates needs to be clarified. Therefore, Telford Homes support paragraph 4.4.1 to ensure there is an established framework going forward with regard to use and duration between all parties.

User: Port of London Authority

Paragraph 4.4.1 of the Draft London Plan recognises that some vacant land is suitable for meanwhile use as housing and policy H4 encourages Boroughs to identify opportunities for the meanwhile use of sites while it is awaiting longer-term development.

Policy SI15 clearly supports the reactivation and use of Safeguarded Wharves for waterborne freight transport including through the use of compulsory purchase powers where necessary, to bring inactivate sites into use. It is also clear at SI15 (E) that temporary uses should only be allowed on a Safeguarded Wharf where they do not preclude the wharf being reused for waterborne freight handling uses. The PLA therefore considers that in order to ensure that Safeguarded Wharves can be reactivated in a timely manner; they should be specifically excluded from the land that Boroughs can consider for meanwhile use.
The PLA therefore recommend the following additional reasoned justification:
Suggested additional explanatory text after paragraph 4.4.1:

"***Sites safeguarded for industrial uses including Safeguarded Wharves are not considered appropriate for meanwhile uses due to the potential impact on their reactivation for industrial uses and waterborne***

***cargo handling uses**.”*

User: Association of Consultancy & Engineering

ACE believes meanwhile use in London can be an efficient use of land by providing other social or construction benefits. Where there is vacant land next to a development, this area could be used a staging post for construction equipment or as storage for materials. This would lessen the impact of moving building equipment on the local transport network and may have the added benefit of speeding up construction times.

The proximity of vacant sites nearby to a new development should be considered at the planning stage, and perhaps local vacant areas could even be shared be multiple developers in an area, creating construction hubs that aim to minimise disruption. These could be on a smaller, more localised scale than what was implemented prior to the 2012 Olympics where logistics hubs were established outside of London.

Alternatively, meanwhile use areas could double as areas for social and communal activities, such as winter markets or open-air cinemas in the summer time. This should be linked into the Mayor’s objective of creating inclusive and vibrant communities.

User:	Brett Group

Whilst fully understanding the principle behind ‘Meanwhile use’ policy, where Boroughs are encouraged to identify opportunities for use of sites for housing to make efficient use of land while it is awaiting longer-term development; we are concerned about the impact that this could have on both land won minerals sites and safeguarded wharfs/ rail heads. Once established there are concerns that such developments will in reality become very difficult to release once housing use is established both potentially sterilising areas for land won mineral but also changing the nature or precluding the use of potential rail head and wharf sites. As a minimum we would like to see the policy excluded from safeguarded wharf and railhead sites.

User:	London Gypsies & Travellers

This should include temporary stopping places for Gypsy and Traveller households who are on unauthorised encampments and have a housing need, to facilitate the negotiated stopping model described in previous comments under H16.

User:	London Assembly Planning Committee

Recommendations

Policy H4 should be amended to explicitly refer to the suitability of offsite manufactured housing for meanwhile use of sites for housing. Paragraph 4.4.2 should be amended to strengthen the encouragement of offsite manufactured housing for meanwhile uses. The Mayor needs to provide a clear and strong leadership role in the development of awareness of the sector's potential.
5.28 There are many potential housing sites in London that are not delivering the new homes the capital requires. Often these sites are temporarily 'stalled' through funding problems, or have been earmarked for development as part of a wider regeneration strategy that is phased over many years. OSM enables these sites to be used almost immediately.43
5.29 The Planning Committee recommends that Policy H4 should be amended to explicitly refer to the suitability of offsite manufactured housing for meanwhile use of sites for housing.

User: Newham Union of Tenants

H4 Meanwhile uses

1. We feel the Mayor should actively support short life user groups / co-operatives in housing people on a short-term basis. We propose that the Mayor actively collate London-wide information of where 'meanwhile' use housing is available and invite short-life user groups to manage homes, as they have done in the past.
2. We are concerned that perfectly good social-rented homes are often left empty for many years (in estate regeneration schemes) resulting in loss of income in terms of rent and council tax – sometimes amounting to amounting to millions of pounds. We suggest that policy should prevent this occurring.
3. 'Meanwhile housing can be provided in the form of precision manufactured housing' should be added to the policy (from the supporting text). We would, however, like to be assured of that good quality materials are used and fire risk is properly considered.

User:	London Waste and Recycling Board (LWARB)

1. We support policy H4 – Meanwhile use. We agree that consideration should be given to the use of meanwhile space for housing to allow optimised use of available space. We would add to this that the use of meanwhile space for other activities should also be considered for example storage of demolition materials for reuse (which has been highlighted as a barrier to increasing reuse within the construction industry). Reuse of building materials supports the circular economy principles set out in the design chapter, and the vision of a low carbon circular economy as set out in the Mayor’s draft LES.

User:	London Waste and Recycling Board (LWARB)

1. We welcome the recognition that precision manufactured homes can reduce construction time and support reuse of materials. We suggest a definition of “precision manufactured homes” is included here to provide clarity, and we would recommend this recognises the need for such homes to be reusable on other sites.

User: London Tenants Federation

4.4.1 Policy H4 Meanwhile uses

We feel the Mayor should actively support short life user groups / co-operatives in housing people on a short-term basis. We propose that the Mayor actively collate London-wide information of where ‘meanwhile’ use housing is available and invite short-life user groups to manage homes, as they have done in the past.

4.4.2 We are concerned that perfectly good social-rented homes are often left empty for many years (in estate regeneration schemes) resulting in loss of income in terms of rent and council tax – sometimes amounting to amounting to millions of pounds. We suggest that policy should prevent this occurring.

4.3 ‘Meanwhile housing can be provided in the form of precision manufactured housing’ should be added to the policy (from the supporting text). We would, however, like to be assured of that good quality materials are used and fire risk is properly considered.

User:	London Borough of Merton

Support with amendments Whilst the principle of the policy is supported, its justification at paragraph 4.4.1 – 4.4.3 is considered overly prescriptive. Often residents, businesses and landowners in local neighbourhoods are best placed to identify potential for meanwhile uses. We would recommend that this justification is changed to support local communities, landowners and the borough working together on identifying viable and attractive meanwhile uses on a particular circumstances; not just the boroughs identifying sites.

User:	London Borough of Haringey
The Council supports the principle of this policy.	

User: London Borough of Lewisham

We support the concept of meanwhile uses in H4 and have been successful in developing a temporary scheme with modular construction techniques at Place/Ladywell.

Further consideration should also be given to:

- That mechanisms will need to be in place to ensure that the land can be developed for the original planned use and within the required timescales.

User:	London Borough of Brent
The policy is supported.	

User:	Save Swiss Cottage

H4 Meanwhile uses
4.1 We feel the Mayor should actively support short life user groups / co-operatives in housing people on a short-term basis. We propose that the Mayor actively collate London-wide information of where ‘meanwhile’ use housing is available and invite short-life user groups to manage homes, as they have done in the past.
4.2 We are concerned that perfectly good social-rented homes are often left empty for many years (in estate regeneration schemes) resulting in loss of income in terms of rent and council tax – sometimes amounting to amounting to millions of pounds. We suggest that policy should prevent this occurring.
4.3 ‘Meanwhile housing can be provided in the form of precision manufactured housing’ should be added to the policy (from the supporting text). We would, however, like to be assured of that good quality materials are used and fire risk is properly considered.

User:	London Borough of Hounslow
LB Hounslow supports this policy	

User:	London Borough of Bromley

The Council welcomes this policy which reflects its approach [involving inviting bids from providers to build modular homes on Council land for homes offsite for homeless households of various sizes].

Confirmation should be provided in the supporting text with regards to if the source of “meanwhile use” contributes to the housing targets in Table 4.1.

User: London Councils

Meanwhile use sites can significantly increase the delivery of housing in the short term (before the permanent development of a site) and it is welcome that the draft Plan recognises this and encourages development. London Councils agrees that meanwhile sites can be particularly suitable for precision manufactured development and modular housing, especially for use in affordable tenures.

A key barrier that prevents the delivery of modular housing on meanwhile use sites is novelty within the planning system. Boroughs, London Councils and the GLA can work together to provide best practice planning guidance for modular developments on meanwhile use sites. This guidance could focus on ensuring that the product granted temporary planning permission is policy compliant, of a high quality and appropriate for its location. The temporary permission or the meanwhile use itself must also not act as a barrier for the permanent development of the site and returning the land to the original purpose.

User:	London Borough of Tower Hamlets

We are supportive of this approach and it is an approach our housing team are already exploring.

However it may be useful to provide greater detail, or encourage boroughs to provide greater detail on how these are processed through the Development Management

User:	Royal Borough of Kingston
Support. Guidance is sought as to how these are monitored, their loss (and a clear exemption from the protection of housing policy regardless of how long they are in use) and whether they contribute to achievement of supply/delivery tests during their lifetime.	

User: HFFTRA

H4 Meanwhile uses

4.1 We feel the Mayor should actively support short life user groups / co-operatives in housing people on a short-term basis. We propose that the Mayor actively collate London-wide information of where ‘meanwhile’ use housing is available and invite short-life user groups to manage homes, as they have done in the past.

4.2 We are concerned that perfectly good social-rented homes are often left empty for many years (in estate regeneration schemes) resulting in loss of income in terms of rent and council tax – sometimes amounting to amounting to millions of pounds. We suggest that policy should prevent this occurring.

4.3 ‘Meanwhile housing can be provided in the form of precision manufactured housing’ should be added to the policy (from the supporting text). We would, however, like to be assured of that good quality materials are used and fire risk is properly considered.

User:	London Borough of Hackney
Hackney supports this in principle.	

User: Westminster City Council

We have no objection to this policy, although the practical difficulties of allowing temporary residential uses of buildings never intended for such use should not be underestimated. It should be made clear that this approach should only be taken in respect of buildings that are suitable and safe for residential use and in appropriate locations, with clear arrangements reflected in the planning permission for the end of the residential use. Given these practical limitations we question whether this really merits a policy of its own. Its relationship to meanwhile space as a source of affordable business space for creative industries, promoted elsewhere in the plan, is also unclear.

User:	London Borough of Southwark

The New Southwark Plan supports meanwhile uses where they deliver community benefits and do not compromise the future redevelopment of the site. As such the policy does not conflict with the New Southwark Plan.

However, the council recommends the Mayor also considers commercial meanwhile uses in suitable locations such as in town centres. The council also recommends the policy acknowledges meanwhile housing should provide an acceptable level of residential amenity.

User:	London Borough of Redbridge

We support the proposals on meanwhile use in policy H4 which will enable the authority to develop options such as modular housing as temporary accommodation, meeting a need for good quality local accommodation to respond to levels of homelessness in the area and prevent the need to use so much accommodation out of borough. Two sites are already proceeding in the borough and we support a proposal that makes these schemes work well.

User:	London Borough of Enfield

Policy H4 looks at ‘Meanwhile Uses’. There is no detail on the types of meanwhile uses that may be suitable. More can be made of the positives of precision-manufactured technologies and pre-fabricated construction. Growth in this sector should be encouraged further. However, it is not immediately apparent what advantage there is in erecting temporary homes on sites already earmarked for residential developments.

User:	London Borough of Wandsworth
Meanwhile use is supported, however it maybe useful that there is flexibility on openspace standards given the temporary nature of the use.	

User:	London Borough of Richmond Upon Thames

Support general approach, where opportunities arise. There may however need to be flexibility for example on residential standards (see comments under Policy D4) given the temporary nature of the use and bearing in mind viability.

User:	London Borough of Harrow

The Council supports the principle of this policy.

However based on the Council’s own experience for this to be financially viable, a lifespan of no less than 10 years would be required. It is therefore unclear how this policy would provide any meaningful contribution to overall housing supply in London.

User:	Royal Borough of Greenwich

As currently worded, this policy is inappropriate. Providing temporary housing on vacant development sites risks exacerbating the housing crisis by failing to deal with the lack of permanent affordable homes for Londoners. With no specified time period for this temporary use many of these temporary homes could become long term. This policy could be seen as providing an opportunity to provide housing on sites that would normally be deemed inappropriate and unsustainable under the pretence that they are temporary. This is likely to lead to pockets of poor quality sub-standard housing in poor locations that falls below design standards. This is not a sustainable approach to housing and will not create mixed and balanced sustainable communities. Furthermore, relocating to other sites once the temporary use has expired could be challenging, time consuming and costly.

User:	London Borough of Havering

This is supported. Will the Mayor of London make funding available to boroughs who could provide this interim solution and what powers will local authorities be given over private landholders to use the land

User:	Berkeley Group

5.7. Meanwhile housing use (H4) needs to be addressed carefully to ensure that it is of appropriate quality and that meanwhile provision does not hinder or delay long term development. The cost associated with meanwhile housing will need to be taken into account when the viability of the eventual development is considered.

User:	London First

We support the principle of policy H4 on meanwhile use as a mechanism for making the best use of land that is not yet ready for development. However, it is important that the temporary nature of the meanwhile housing use is communicated to residents of the development and the existing surrounding community. This should be reflected in the supporting text of the policy. While the policy encourages the identification of opportunities for meanwhile use of sites for housing, the supporting text in para 4.4.1 should be clearer that not all sites will be suitable for meanwhile housing and that it is not a blanket policy approach.

User:	London Borough of Bexley

Whilst the principle of **Policy H4 Meanwhile uses** is welcome, there is concern that including housing as a meanwhile use could cause distress to people occupying these homes; especially if evicting them from the temporary accommodation would mean that, they would become homeless. Even the most well intentioned residential meanwhile use could end up in the courts, with residents unwilling to leave and the subsequent impact being the delay to the longer-term development. The inappropriate growth of small HMOs is an example of the scope to exploit this type of policy. It is recommended that meanwhile uses on development sites be for uses other than housing.

User:	Federation of Small Businesses

We need clarity about ‘Meanwhile use’ as this could also be identified as used for commercial space before longer term development. There might be conflicts on this issue within the council.

User: London NHS Clinical Commissioning Group

Policy H4 Meanwhile use

We support the policy on meanwhile (temporary) uses for sites for housing, but consider that the policy could be extended to other uses which require land or space within buildings for a temporary period. Indeed, Policy HC5 refers to the potential for culture and creative activities as meanwhile uses of vacant properties and land and Policy D7 (paragraph 3.7.12) refers to the meanwhile use of phased development sites to create attractive public realm. In the case of new health facilities and other social infrastructure provision, temporary uses could be introduced to help improve the utilisation of buildings and reduce the financial risk of surplus space, particularly where space requirements will change over time in response to population growth and changing needs.

User: London Federation of Housing Cooperatives

H4 Meanwhile uses

4.1 We feel the Mayor should actively support short life user groups / co-operatives in housing people on a short-term basis. We propose that the Mayor actively collate London-wide information of where ‘meanwhile’ use housing is available and invite short-life user groups to manage homes, as they have done in the past.

4.2 We are concerned that perfectly good social-rented homes are often left empty for many years (in estate regeneration schemes) resulting in loss of income in terms of rent and council tax – sometimes amounting to amounting to millions of pounds. We suggest that policy should prevent this occurring.

4.3 ‘Meanwhile housing can be provided in the form of precision manufactured housing’ should be added to the policy (from the supporting text). We would, however, like to be assured of that good quality materials are used and fire risk is properly considered.

User:	Chartered Institute of Architectural Technologists

Policies H1, H2, H3 & H4

We are in agreement with the proposals contained in the plan.

User:	U+I
Aligned to our partnership approach, we believe that meanwhile-use can be truly worthwhile when it has been conceived from an understanding of the community and a commitment to delivering social and economic value that is authentic to the area.	

User:	British Property Federation

We support the policy. It seems eminently sensible to encourage temporary use of sites for housing, mindful of the considerations set out in the policy.

User:	Apex Airspace Development

We welcome the exploration in using modular housing in under developed land particularly as temporary accommodation can be created using the rooftop model across sites that are awaiting refits or refurbishment.

User:	Apex Airspace Development

Precision manufacture homes can be used as temporary accommodation across London’s unutilised rooftops and potentially reused across other land uses provided that a modular package is specified and produced to be moved around from borough to borough to help alleviate homelessness. Apex housing solutions already has a portfolio of temporary accommodation that can be assessed for such a solution to this issue.

User: London Housing Directors

Meanwhile use sites can significantly increase the delivery of housing in the short- to medium-term (before the permanent development of a site) and it is welcome that the draft Plan recognises this and encourages development.

The London Housing Directors' Group agrees that meanwhile sites can be particularly suitable for precision manufactured development and modular housing, especially for use in affordable tenures. This could ensure the utilisation of sites that would otherwise remain dormant while they await their permanent use, either (for example) because they are earmarked for future uses such as transport infrastructure or because of phased build out timetables for permanent developments. The London Plan needs to recognise the impermanent nature of such developments and the greater financial risks they involve. Planning policies that would normally be applied to traditional permanent developments may make such development unviable. It would therefore be helpful if the new plan could give greater flexibility for such sites in regards to provisions related to issues such as accessibility. From our experience, the provision of facilities such as lift cores can dramatically increase the costs of these schemes. While we believe accessibility requirements should be important on such schemes, it would be helpful if the requirement that 10 per cent of units be accessible could be delivered on the ground floor.

A key barrier that prevents the delivery of modular housing on meanwhile use sites is its novelty within the planning system. The GLA and boroughs can work together to provide best practice planning guidance for modular developments on meanwhile use sites. This guidance could focus on ensuring that the product granted temporary planning permission is policy compliant, of a high quality and appropriate for its location. The temporary permission or the meanwhile use itself must also not act as a barrier for the permanent development of the site and returning the land to the original purpose.

User: Benhill Residents

We feel the Mayor should actively support short life user groups / co-operatives in housing people on a short-term basis. We propose that the Mayor actively collate London-wide information of where ‘meanwhile’ use housing is available and invite short-life user groups to manage homes, as they have done in the past.

We are concerned that perfectly good social-rented homes are often left empty for many years (in estate regeneration schemes) resulting in loss of income in terms of rent and council tax – sometimes amounting to amounting to millions of pounds. We suggest that policy should prevent this occurring.

‘Meanwhile housing can be provided in the form of precision manufactured housing’ should be added to the policy (from the supporting text). We would, however, like to be assured of that good quality materials are used and fire risk is properly considered.

User: 313-349 Ilderton Road LLP

Policy H4 Meanwhile use state that Boroughs are encouraged to identify opportunities for the meanwhile use of sites for housing to make efficient use of land while it is awaiting longer-term development.

We support the principle of this policy, however the Plan must take the opportunity to ensure development delivery is expedited.

User: Elaine Chambers

H4 Meanwhile uses

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4.2 We are concerned that perfectly good social-rented homes are often left empty for many years (in estate regeneration schemes) resulting in loss of income in terms of rent and council tax – sometimes amounting to amounting to millions of pounds. We suggest that policy should prevent this occurring.

4.3 ‘Meanwhile housing can be provided in the form of precision manufactured housing’ should be added to the policy (from the supporting text). We would, however, like to be assured of that good quality materials are used and fire risk is properly considered.

User:	Fairview New Homes

Fairview would like the policy clarified making it clear that it is principally directed at large multi-phased developments. There is a risk that otherwise the policy will be translated into conditions on small sites and add further work for developers trying to justify why they just want to get on with development.

User: Earls Court Public Sector Tenants' Assoc

We feel the Mayor should actively support short life user groups / co-operatives in housing people on a short-term basis. We propose that the Mayor actively collate London-wide information of where ‘meanwhile’ use housing is available and invite short-life user groups to manage homes, as they have done in the past.

We are concerned that perfectly good social-rented homes are often left empty for many years (in estate regeneration schemes) resulting in loss of income in terms of rent and council tax – sometimes amounting to amounting to millions of pounds. We suggest that policy should prevent this occurring.

‘Meanwhile housing can be provided in the form of precision manufactured housing’ should be added to the policy (from the supporting text). We would, however, like to be assured of that good quality materials are used and fire risk is properly considered.

User:	London Property Alliance
Temporary uses of land are not a strategic issue and the inclusion of policy on this topic is unnecessary.	

User:	Bishopsgate Goods Yard Regeneration Limited

Our client is supportive of the policy which seeks to encourage temporary uses on sites for housing. However, this policy should not be restricted to housing sites alone and should be open wider to all development sites.

User: The British Library

Policy H4 – Meanwhile use

The proposal for meanwhile uses on sites waiting for longer term development is supported. However, it is considered that this should not be restricted to just sites for ‘housing’, which are awaiting longer term development.

It is suggested that this policy and supporting text should be reconsidered to allow the potential for meanwhile uses to be provided on other development sites. This could be in addition to this policy, or might be better served in a part of the DLP which is not specifically related to housing.

User:	London Borough of Newham

Policy H4 Meanwhile use

LBN are generally supportive of the policy which is complementary to Newham's Draft Revised Local Plan which seeks temporary accommodation as a meanwhile use on strategic sites.

User:	London Borough of Sutton

SUPPORT. The London Borough of Sutton supports the provisions of Policy H4 and considers it is broadly consistent with the council's current approach of developing modular housing for council owned land.

The London Borough of Sutton considers that the supporting text of Policy H5 should clarify whether housing delivered from this source can count towards the housing target for the borough.

User: Clarion Housing Group

The idea of meanwhile homes needs to be treated with caution. It's an indication of the extent of immediate housing pressure that this is being considered. Re-locatable volumetric homes may provide a small number of temporary homes across the capital, but the realistic timeframe for their use needs to be considered very carefully. If the housing is short lived then the residents are unlikely to establish neighbourhood connections, find local work before they are dispersed and the meanwhile housing is an unsatisfactory stopgap, resulting in disruption to children's education or support networks. If it is being used as part of a larger phasing decanting process, there should be better ways of managing residents temporary moves – Clarion's intention is that existing residents in regeneration projects move only once. Equally the long life of post war prefab's show that temporary homes have an unfortunate habit of becoming permanent. If a site is not suitable for residential housing, or there are concerns about the risk to residents of short term nature of the homes then another meanwhile use would be preferable.

Policy H4 Replace: ***Borough should identify opportunities for the meanwhile use of sites for housing if they can demonstrate that they have carefully considered the negative impact on residents of temporary allocations and have plans to mitigate these***

User: Dagenham Dock Limited

Draft Policy H4 – Meanwhile Use

Whilst DDL is supportive of the GLA's aspiration to install meanwhile uses on sites for housing in order to make efficient use of land whilst it is awaiting longer-term development, Policy H4 must acknowledge that this may not always be feasible on some of the larger, strategic sites in London. For example, whilst DDL's Dagenham Dock site is an extensive area which has been cleared of existing structures, there is an ongoing extensive programme of site clearance and remediation works that would restrict any meanwhile uses during the early stages of work. There may however be potential to consider temporary advertising / leisure type facilities at a later date. DDL therefore request that this is acknowledged by the Mayor on the implementation of Policy H4.

User: Modomo

Guidance on temporary/meanwhile uses is contained within Policy H4 of the Draft London Plan.
The Policy states:

“Boroughs are encouraged to identify opportunities for the meanwhile use of sites for housing to make efficient use of land while it is awaiting longer-term development”.

My client strongly supports the thrust of this policy which illustrates the importance of meanwhile uses as a form of contributing to the increased housing targets. However, the policy presents an opportunity to expand the influence of meanwhile housing within London and we argue that there are further prospects to explore with regard to supporting modular housing in the London Plan.

Wording of Policy:

Whilst the thrust of the policy is strongly supported, we consider the London Plan can further encourage the provision of meanwhile housing. The supporting text makes allowances for theidentification of sites appropriate for meanwhile housing, however there should be a stated presumption in favour of temporary housing for sites awaiting longer-term development. This will encourage developers to identify sites they believe are appropriate for this form of housing which can further contribute to individual housing targets.

The National Planning Policy Framework (NPPF) advocates for a presumption in favour of sustainable development and states that planning must be a creative exercise in finding ways to enhance and improve the places in which we live our lives. Paragraph 14 of the NPPF reiterates that the presumption in favour of sustainable development should be seen as a golden thread running through both plan-making and decision-taking. In accordance with this, developers should not have to wait for Local Authorities to allocate sites for meanwhile uses – development that is sustainable should go ahead without delay, therefore there must be scope within the policy for a presumption in favour of sustainable development where modular housing schemes/sites are coming forward. They offer a creative way of providing affordable housing whilst widening the choice of high quality homes, thus are in full accordance with the aims of the NPPF and this should be reflected in Policy H4 of the Draft London Plan.

Furthermore, there should also be scope for the potential fast-tracking of temporary housing planning applications as they will not be present in the long term, yet can still deliver highly sustainable social homes for London’s growing population. The fast tracking process could potentially only focus on certain conditions such as transport and highway implications of the development and local amenity considerations. Due to the nature of the use, fast tracking applications can have the effect of delivering housing at a faster rate allowing Local Authorities to more efficiently meet their housing targets.

The temporary use of a site for meanwhile housing should therefore be further supported through additional text in the policy, allowing for a presumption in favour of this type of development when determining planning applications and a fast track process for development which only considers certain conditions such as transport and highway implications and residential amenity requirements as set out elsewhere in London Plan documents. It is also considered that greater flexibility should be incorporated into the policy in terms of identifying sites for meanwhile uses. Where a site has been vacant for a certain period of time (for example 1.5 years), it should be considered appropriate for modular housing which can provide an immediate and efficient use.

The supporting text to the policy encourages precision-manufactured homes, stating these can reduce construction time and the units can potentially be reused at a later date on another site. This text is strongly supported by our client who seeks to provide similar modular housing on appropriate sites.

User: DTZ Investors

Scope of the London Plan and deviation from National Planning Policy

General concern is raised that with respect to the admission in the “Introducing the Plan” section that “the Plan deviates from existing national policy and guidance” on the basis that “the Plan is delivering on a specific Mayoral commitment”. It is a fundamental requirement for the London Plan to be consistent with National Planning Policy with Section 337(6)(a) of The Greater London Authority Act 1999 as the Secretary of State has the power to impose a direction to the Mayor of London not publish the London Plan if there is “any inconsistency with current national policies or relevant regional planning guidance”.

In this context, further concern is expressed that the Draft London Plan contains policies that are too detailed and overly prescriptive for a document which is to comprise the Spatial Development Strategy for London and is required by law (under Part VIII, Section 334 of The Greater London Authority Act 1999) to ‘deal only with matters which are of strategic importance to Greater London’.

In this context, particular concern is raised in respect the policies which set out requirements for design scrutiny (Policy D2); detailed internal space standards for housing and hotels (Policies D4 and E10); requirements for hot food takeaways (Policy E9) and temporary/’meanwhile’ uses (Policy H4), as containing a level of detail which goes far beyond the remit for the London Plan, which should addressed by local planning policies and supplementary planning guidance as appropriate, to meet individual boroughs’ needs and requirements. These policies in particular should be deleted or amended to ensure the emerging London Plan accords with the requirements of The Greater London Authority Act 1999.

User:	London Borough of Ealing

The Council supports this policy, in particular, the encouragement for the use of precision manufactured homes.

User: EC Properties LP

Capco is fully committed to engaging with the Mayor and GLA officers in relation to a review of the approved Earls Court Masterplan, to deliver more homes and, in particular, more genuinely affordable homes. Additionally, Capco, as appropriate, is willing and able to assist in the formulation of the London Plan approach to Opportunity Areas, high density and design/development standards. Some general comments and observations in this respect are set out below:

Meanwhile use: Capco supports the principle of Policy H4 on meanwhile use as a mechanism for making the best use of land that is not yet ready for development. However, it is important that the temporary nature of the meanwhile housing use is communicated to residents of the development and the existing surrounding community. This should be reflected in the supporting text of the policy.

User: Peabody

5.1 Meanwhile Use can be an excellent way to make use of land in a way that benefits the community while land awaits development. We are proud to collaborate with Mercato Metropolitano, the popular Italian food market on a Peabody-owned site near Borough. We support the guidance for boroughs to identify opportunities for such uses.

5.2 However, it must be ensured that these meanwhile uses do not later prevent development. Peabody has one site where we are developing a school; the garden was offered as a community garden for Meanwhile Use. Some local campaigners are now attempting to stop the development, which consists of 50% affordable housing. This is unacceptable given local need for these homes and the charitable nature of the temporary agreement.

5.3 We also suggest that Meanwhile Use can serve as an excellent opportunity for boroughs and other landowners to establish a network of temporary stopping places, or transit sites, for Gypsies and Travellers. This would serve the dual purpose of addressing the shortage of appropriate sites for a vulnerable group in housing need, and reducing the impact of unauthorised encampments on the local communities.

User:	Natural England

Natural England believes that there is an opportunity to support the use of suitable meanwhile sites, which can exist for a number of years before development begins in earnest, as locations for community greenspace or allotments. In the intervening period between planning permission and construction these sites may contribute towards providing habitat connectivity and promoting community involvement in the management of greenspace, as would be in line with Environment Strategy policies 5.2.1c and 3.1.1f. As such we would encourage the addition of text to support this aim within this policy. Examples of where this has been done include ‘the Skip garden’ at King’s Cross and Mobile City Garden Stratford.

User:	Hornsey & Wood Green Labour Party

We support the use of precision-manufactured homes to provide housing on sites waiting longer-term development, provided they meet rigorous environmental standards.

User:	Richard Bennett

Policy H4 ‘Meanwhile Use’ is welcomed. This policy should make it clear that ‘meanwhile use’ would be ideal as a temporary stopping place or area of temporary acceptance for the Gypsy & Traveller communities.

User: Mr Gary Hayes

H4 Meanwhile uses

4.1 We feel the Mayor should actively support short life user groups / co-operatives in housing people on a short-term basis. We propose that the Mayor actively collate London-wide information of where ‘meanwhile’ use housing is available and invite short-life user groups to manage homes, as they have done in the past.

4.2 We are concerned that perfectly good social-rented homes are often left empty for many years (in estate regeneration schemes) resulting in loss of income in terms of rent and council tax – sometimes amounting to amounting to millions of pounds. We suggest that policy should prevent this occurring.

4.3 ‘Meanwhile housing can be provided in the form of precision manufactured housing’ should be added to the policy (from the supporting text). We would, however, like to be assured of that good quality materials are used and fire risk is properly considered.

User: Cllr Richard Chatterjee

Policy H4 Meanwhile use

A Boroughs are encouraged to identify opportunities for the meanwhile use of sites for housing to make efficient use of land while it is awaiting longer-term development.

Comment:

The duration of ‘meanwhile use’ developments should be limited to a prescribed period, otherwise ‘meanwhile’ could extend to ‘permanent’.

Recommendation:

Define the limiting duration of ‘meanwhile’ to prevent extension to unacceptable durations.

User: Andrea Carey Fuller

We feel the Mayor should actively support short life user groups / co-operatives in housing people on a short-term basis. We propose that the Mayor actively collate London-wide information of where ‘meanwhile’ use housing is available and invite short-life user groups to manage homes, as they have done in the past.

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‘Meanwhile housing can be provided in the form of precision manufactured housing’ should be added to the policy (from the supporting text). We would, however, like to be assured of that good quality materials are used and fire risk is properly considered.

User: dp9

Paragraph 3.7.12 – Meanwhile uses

Whilst we support meanwhile uses, we do not consider that they are always appropriate or possible, and we would discourage a move towards seeking to impose tighter controls on them as this could have the opposite effect of the draft policy's intention. Part of their attraction is their ease and temporary nature, and there is a likelihood that landowners will be discouraged from doing them if requirements are then imposed on them in terms of their longevity and other 'obligations', as specified at paragraph 3.7.12. Meanwhile uses are only appropriate in limited situations. Often, particularly on constrained sites, land is required for logistics to deliver the permanent development, and the introduction of meanwhile uses could serve to disrupt or delay delivery.

RECOMMENDATION: Delete the requirement to establish parameters for meanwhile uses at the outset.

User:	Kingston First

In addition to new development, draft Policy H4 of the draft Plan also promotes the temporary or 'meanwhile' use of vacant buildings or land. Kingston First does not object such a policy, but asks that the wording is amended to make it clear that such uses are temporary, and should not set a precedent for housing on land which would otherwise be prioritised for commercial use.

User:	Elephant Amenity Network

H4 Meanwhile uses

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4.2 We are concerned that perfectly good social-rented homes are often left empty for many years (in estate regeneration schemes) resulting in loss of income in terms of rent and council tax – sometimes amounting to amounting to millions of pounds. We suggest that policy should prevent this occurring.

4.3 ‘Meanwhile housing can be provided in the form of precision manufactured housing’ should be added to the policy (from the supporting text). We would, however, like to be assured of that good quality materials are used and fire risk is properly considered.

User: London Borough of Camden

The Council supports the principle of meanwhile use of development sites for housing, but has some concerns regarding how this will operate in practice.

We question whether it will often be possible to introduce meanwhile uses without some impact on the future development programme, especially where these involve the erection of temporary buildings and the establishment of residents with some rights of occupation.

In addition, we are concerned that meanwhile housing use could generate additional responsibilities for councils to tackle homelessness and provide replacement temporary accommodation when long-term development proposals are implemented. We therefore propose that paragraph 4.4.1 should require parameters for meanwhile housing use to include arrangements for rehousing the occupiers when the site comes forward for longer term development.

The Council also notes that GLA funding is likely to be necessary to enable meanwhile housing to be delivered in the form of precision-manufactured modular homes and re-used on alternative sites in the future.

User: Pat Turnbull

Policy H4 Meanwhile use

4.4.2. Meanwhile housing can be provided in the form of precision-manufactured homes. **This requires a more precise definition to ensure that these are not container homes and other types of housing unfit for human habitation.**

Policy H5 Delivering affordable housing

User:	Ms Claire Moll

I urge those making the final decision on this plan to keep 50% affordable housing in all new builds. I also encourage them to define affordable housing as Tower Hamlets Council does in terms of area income rather than market price.

User: Jaspar Group

Please provide evidence that the implementation of this policy will not stifle delivery and render most brown field sites unviable.

It is understood that developers can submit a viability assessment to justify a deviation from the policy, however evidence needs to be provided that quoting that 50% of housing should be affordable won't deter land owners bringing forward land for development. This could perversely lead to further house price inflation to market housing and not lead to any increase in the provision of affordable homes.

I have never in my 18 year career come accross a brown field site in private ownership that has been able to provide over 35% mixed tenure affordable housing.

User:	Jaspar Group

Again this section does not recognise direction from Central Government detailing that schemes of 10 units or less of 1000m2 of floor space or less should not be subject to affordable housing contributions. This should be referenced to ensure the plan is sound.

User: Jaspar Group

Please explain when in recent years London Boroughs have relaxed social housing policy requirements? In recent years social housing thresholds have fallen, certain Boroughs apply a threshold of one unit, and policy requirements have risen.

Given that I have seen no relaxation in affordable housing policy, I fail to see how a causal link can be formed with rising land value.

I also would like to see evidence supporting the idea that a rise in land value would result in reduced housing delivery.

This whole section should be removed as it makes vague and innacurate assertions.

User:	Jaspar Group

Review mechanisms should be upwards and downwards to reflect changing market conditions and ensure schemes remain viable in a falling market.

User: Mr Peter Eversden MBE

In Policy H5 the figure of 50% in various places is wrong. According to paragraphs 1.4.3 and 4.5.1, 43,000 or 43,500 new homes annually should be "genuinely affordable." That is 65% or more of the 66,000 additional homes required each year as shown in Table 4.3.

One of those two numbers for annual affordable homes should be changed so that the same figure is used throughout the Plan.

H5 must show the SHMA requirement of 65% of all homes to be affordable in each of its sections.

The Mayor's target of 50% quoted would not deliver the amount of affordable housing, so the requirement of the NPPF to seek to meet objectively assessed need is not met.

There should be explanation in or with Policy H5 on how the 15% shortfall of affordable housing will be planned and delivered. Leaving it to the boroughs to decide what type of affordable homes should be delivered in 40% of the total is unlikely to make up the shortfall, particularly if developers continue to exceed the 35% that is supposed to be the figure for market housing.

In Policy H5 A 4) there is an unrealistically low and unacceptable target of 50% of affordable homes on publically owned land. The figure should be 75% minimum. If land that developers have bought at land values reflecting its potential for housing can deliver 50% affordable homes, then land which is at existing use values and developed as such should be able to deliver higher percentages of affordable homes.

Policy H5 B conflicts with Policy H2 H and paragraph 4.5.5 for whether or not affordable housing should be provided on site.

User:	Mrs Christine Clifford

I do not feel hopeful that this will change anything. It's too vague and offers enough get out opportunities to property developers and local authorities with such developers on planning committees

User:	Mrs Christine Clifford
This will see more luxury development masquerading as affordable housing	

User:	Mrs Christine Clifford

Poor doors

an obnoxious term of recent years. If you want mixed tenure. And many existing council estates are now this post RtB with leaseholders, sub lets as well as council tenants

User:	Mrs Christine Clifford
Truly affordable housing is always possible. There should be no get out clause	

User:	Mrs Christine Clifford
Truly affordable housing is always possible. There should be no get out clause	

User: MS J GELLER

I do not believe that people want mixed use and all inclusive community developments. We all strive to live alongside others that are like ourselves. The mention of affordable housing within a development immediately brings to mind crime, rubbish on the streets and noise. Having these inclusive developments could make some people decide not to buy property within a development like this. We all want to live amongst like-minded folk. Better to have separate developments for affordable accomodation. Trying to mix people from different walks of life will not work. Social integration does not work. The mayor only has to look at the extreme behaviour of some religious groups against others to see that social integration will never happen.

User:	MS J GELLER

Even at 80% of the average local rent, housing in London will never be affordable. Shared ownership schemes are quite ridiculous as a mortgage has to be available and rent and mortgage paid at the same time. How can most normal hard working peope on low salaries afford this when in the end they do not own really anything, just 30% of the value of the property.

User: Mr Bob Phillips

The term "affordable housing" was introduced by Grant Shapps and the Tories in a blithe reenactment of the manipulation of languge at the "Ministry of Truth" in George Orwell's 1984. The term "affordable housing" in current use means unaffordable housing in London - housing that is hugely less affordable thant the Council houses that were part of an equitable fabric of Britain. We must stop using the term. There is social housing and there is expensive housing priced by the market.

User:	Mrs Sarah Witney

I agree in principle with this but an very concerned that "affordable housing" means starter small flats and that there are no affordable/ accessible family homes beng built.

User: Daniel Scharf

I have not read the whole draft but have looked at the Housing SPG.

These suggestions might not all have strategic significance but are important to the future of the City.

1. The Plan should ensure that sufficient serviced plots are offered to people on the statutory registers. If Waltham Forest is typical with no plots having been offered to the 400 on its register then the Mayor/London Plan should require parts of all sites to reserved for this purpose and only passed back to the developer for completion if thee is no interest from the register.

2. The NASCBA estimate that half of all households are interested in self/custom building. The Government expect this to scale from 7% of

150,000 to 20% of 250,000 or even 300,000. This will not be achieved without strong intervention privileging (not just supporting the

idea) custom building.

3. Similarly, co-housing (eg associations of individuals on the

registers) will not happen unless privileged through policy requiring parts of larger sites to be reserved for that purpose.

4. Custom- splitting could help in the provision of a larger numbers of smaller dwellings, reducing unsustainable levels of under-occupation, and enabling an energy refit to some of the 70% of dwellings at EPC D and below (as a condition of a planning permission or LDO) by 2050. See

http://dantheplan.blogspot.co.uk/2017/08/migrating-to-problematic-future.html

User:	Mr Max Millington

Affordable housing must be sensitively incorporated into and across development sites to best achieve social integration and promote social mobility: blocks of ghetto-style housing provided only for social housing abosultely must be resisted, even to the extent it delivers a small incremental addition to social housing stock. The long term consequences for the individuals and the costs to the Borough far outweigh any such attraction.

User:	Levitt Bernstein

If the acceptable minimum provision of affordable housing, under H6-B-1, is 35%, a policy requirement (even a strategic one) for 50% is at best confusing. We are regularly asked to confirm that our designs meet all London Plan policies, and it is bewildering to clients when we explain that due to inconsistencies between policies, this cannot always be achieved and we need to produce a disclaimer. Policies should be distinct from targets and should be generally expected to be met in full.

User:	Levitt Bernstein

We strongly support the direction of travel of this policy. We note, however, that in setting aside only 35% of housing for ‘affordable’ dwellings, under H6, B,1 – and recognising that these are required for those on household incomes of up to £90,000, we are still facing a situation whereby 65% of the housing that we build is not affordable to the majority Londoners.

User:	Levitt Bernstein
We suggest that guidance is provided as to how off site contributions should be monitored so a standard approach is taken across boroughs.	

User: Ms Natasha Sivanandan

a. Writing as a social scientist and trained lawyer as well as a resident of social housing, I make the following points. Research shows that the current housing disaster / crisis in London has been caused by 4 key problems: (1) the scrapping of the Rent Acts, which set fair rents and protected private tenants; (2) the paucity of homes for rent at social rent for those who are on low or no incomes or on benefits; (3) the sale of council homes under the "right to buy" policy, thus depleting good quality housing stock at social rent; (4) the inability of local Councils to use the money from Council home sales to build new homes. (5) In addition, these probelms are being made worse by the Housing and Planning Act 2016 as housing associations get into the business of selling public housing which was bought previously using public funds. **In effect, all these policies transfer public assets into private hands and represent a transfer of wealth from the poor to the rich. The Mayor's Policy does nothing to effectively challenge this.**

b. Therefore what the Mayor should do is scrap all arangements / deals involving getting out of agreeing to build 50% "affordable" housing. The idea that house builders should be able to get out of the 50% affordable housing agreement is wrong and has led to major problems in the past - eg: Heygate Estate / Elephant Park. Though public assets such as public land are being used, the public don't get a good deal out of the existing arrangements and the Mayor's proposals are wholly inadequate and show a lack of clear analysis.

c. The Mayor's formula for "affordable" housing is simply wrong. The formula ignores the fact that a large part of London's workforce work in jobs that pay minimum wages. Looking at "average" income is statitisctically and methodologically unreasonable as the massively inflated incomes of rich Londonders distorts the figures. So The Mayor's definition of "affordable" housing is wrong and misleading because it is not actually affordable for many who live and work in London and who the jobs that keep the city ticking over - that clean our schools, hospitals and offices, who care for our elderly and sick, to give just a few examples. Poor people in London can only afford to rent and they can only afford **social rents, not affordable rents**. **So the Mayor should change the agreement / demand - developers should have to build 50% of homes to be rented at social rent and these homes must <u>not</u> be available to buy. This can be done by making them available to rent at renewable 4-yearly tenancies.**

User:	Goldcrest Land

In section A amend the text as indiacted in italics below:

The strategic target is for 50 per cent of all new homes delivered across London to be affordable *subject to viability of the scheme.*

This is an important matter that should be set out in the opening section of the draft policy.

User: Trust for London

We broadly support this policy, and would encourage an even greater emphasis on homes for affordable rent within the overall policy, given the prevalence of need here.

Evidence from the London Poverty Profile shows that high housing costs push around 1 million additional Londoners into poverty. Over three quarters of those living below a Minimum Income Standard for London are in rented accommodation; for working-age, single Londoners, rent accounts for 50% of income in inner London, and even 40% in outer London, making it essentially impossible to save for a deposit. (Source: https://www.trustforlondon.org.uk/publications/minimum-income-standard-london-2017/)

For those on low incomes, buying a home – even through shared ownership – is not a realistic aspiration, and the priority should be to provide genuinely affordable rented homes. There has been genuine concern about what affordable means and at times the term 'affordable' has taken on an Orwellian dimension. We welcome greater clarity on affordability. We acknowledge that housing supply needs to meet the needs of those who are on low, middle and high incomes. But affordable homes should be within the means of those on low and middle incomes. We would therefore question shared ownership being within the affordable definition given this is not a realistic option for this group, especially those with families and in Inner London.

We agree that affordable housing should be provided on site and is inclusive and mixed by tenure and household income.

As the London Tenants Federation has stated:

“The evidence of need for social-rented homes in London is enormous. GLA housing needs assessments have consistently shown that around 50% of homes [need] to be social rented if the backlog of need were to be met over a 10-year period, while only 17% of homes delivered between 2005 and 2015 were social or affordable rent homes. As the backlog of housing need has grown the response from the Mayor’s office has … [extended] the time period to address the backlog… from 10 to 20 years.” (Source: London Tenants Federation: http://www.londontenants.org/publications/responses/LTF%20reponse%20to%20draft%20London%20Housing%20Strategy%20Dec%202017.pdf)

We also encourage the Mayor to communicate his approach to planning with clarity and consistency, aiming to create certainty, to encourage investment and maximise delivery.

User:	Trust for London

We welcome the new estimates of need for London. We note as part of this the importance of providing housing for those on middle incomes. Research we funded by Danny Dorling and Benjamin Hennig (Oxford University) has shown that, over time, London has seen a 28 percentage point decline in the proportion of people who are neither rich nor poor (defined as above the poverty threshold and below the inheritance tax threshold). It has moved from being by far the largest group in 1980 to roughly one in three households in 2010. (http://www.londonmapper.org.uk/analysis/poverty-and-wealth-1980-2010/). The disappearance of this group from swathes of London, particularly inner London, undermines the goal of achieving mixed communities.

User:	Trust for London

We welcome the threshold approach to viability, which we hope will reduce the waste of resources going into viability testing, reduce costs, and speed up delivery.

User:	Trust for London

We welcome the clarification that off-site delivery should be an exception with extensive justification, and support London First in seeking a consistent approach for this across the capital. We disagree however with London First's assertion that higher-density developments such as town centres are 'not generally suitable for families' (The Off-Site Rule, London First 2016) and that this justifies off-site provision. Rather, in the context of extensive housing need among families, developers must work to make high-density living family-friendly for a range of tenures. This includes providing adequate social infrastructure for families.

User:	Trust for London
As noted above, cash in lieu has exploded beyond reasonable levels, and this loophole should be closed.	

User:	Trust for London

We welcome this clarification and hope that appropriate resources are committed to holding boroughs and developers accountable for their performance on it.

User: London Forum of Amenity and Civic Societies

In **Policy H5** the figure of 50% in various places is wrong. According to paragraphs 1.4.3 and 4.5.1, 43,000 or 43,500 new homes annually should be "genuinely affordable." That is 65% or more of the 66,000 additional homes required each year as shown in Table 4.3. One of those two numbers for annual affordable homes should be changed so that the same figure is used throughout the Plan.

There should be explanation in or with Policy H5 on how the 15% shortfall of affordable housing between the Mayor's aim for 50% and the SHMAA need of 65% will be planned and delivered. Leaving it to the boroughs to decide what type of affordable homes should be delivered in 40% of the total (Policy H7 A 3) is unlikely to make up the shortfall, particularly if developers continue to exceed the 35% that is supposed to be the figure for market housing in new developments.

In **Policy H5 A 4)** there is an unrealistically low and unacceptable target of 50% of affordable homes on publicly-owned land. The figure should be 75% minimum. If land that developers have bought at land values reflecting its potential for housing can deliver 50% affordable homes, then publically-owned land which is at existing use values and developed as such should be able to deliver higher percentages of affordable homes.

In **Policy H5 B** there should be more requirements on how boroughs must plan for affordable housing. London Forum proposes that in H5 and H6 there should be modified parts of Policy 3.11 B and C of the existing London Plan (FALP). The current FALP policies on this subject with which the boroughs are working should not be weakened in the New London Plan, as continuity is important.

User: Montagu Evans

Draft Policy H5 – Delivering Affordable Housing

The Trust supports the Mayor's aims to boost the supply of housing and to deliver more affordable homes for Londoners. This draft policy notes that affordable housing should be provided on site in order to deliver communities which are inclusive and mixed by tenure and household income, providing choice to a range of Londoners.

As with our comments on other draft policies, we consider it important to highlight that affordable housing should not be sought at the cost of investment in important services, including healthcare, that are necessary to the successful functioning of London.

Where affordable housing is provided on surplus NHS land it should be aimed at, in the first instance (e.g. by way of a nominations agreement), healthcare staff and other NHS workers in line with the aims of the 2017 Naylor Review.

User: HEAR Equality and Human Rights Network

The Plan should have greater strength to challenge developers who seek to circumvent targets on affordable housing or use tactics to alter mixes or provide housing in the mix that is not truly affordable

The Plan should not just be about affordable housing but greater provision of social housing, which is vital for the housing provision in London

Affordability must be more clearly defined, the definition must be explicit in the Plan itself and not just via referring to the Housing Strategy, which has already closed for consultation

The new housing policy will force councils to ballot residents on housing estates earmarked for demolition if they are to secure GLA money for the work.

It is acknowledged that there has been a recent change in affordability meaning in the London Housing Strategy:

4.18 The Mayor does not consider 80 per cent of market rents to be genuinely affordable in most parts of London. That is why, through his Affordable Homes Programme, the Mayor is supporting delivery of London Affordable Rent homes with benchmark rents based on social rent levels.

?

Concerns are raised that this isn’t conveyed properly in the London plan and that it should be more clearly linked.

Affordable for whom? many schemes such as shared ownership are branded as affordable but in fact are not affordable for most people, with mix of rent, mortgage and service charges. There are also concerns about how shared ownership properties can be sold.

User:	Diocese of Southwark

The Diocese of Southwark supports the strategic target for 50% of all new homes delivered across London to be affordable and that affordable housing should be provided on site in order to deliver communities that are inclusive and mixed.

The Diocese of Southwark asks the Mayor to specifcally consider the provision of affordable housing for religious leaders, including clergy, together with youth leaders and other faith workers.

User: London Assembly Green Party Group

The figures from the SHMA on London's housing needs shown in table 4.1 define how overwhelmingly London needs new low-cost rented homes. Overall, 65 per cent of new homes provided need to be either low cost rent or intermediate tenures.

In August 2017, I highlighted that no social rented housing had started under Mayoral funding programmes since the Mayor was elected in May 2016.

The London Tenants' Federation outlines in its submission to the draft Housing Strategy that, between 2005 and 2015, London Plan targets for market homes were over-achieved at 124 per cent of targets, while only 53 per cent of targets for social and affordable rented homes were achieved.

In this plan period it is therefore even more crucial that requirements for the proportion of new homes provided under affordable tenures meets the need defined in the SHMA. This draft policy does not yet do this.

Policy H5 (as well as policy H7 which covers the split between different affordable tenures) must be amended to fit the needs of Londoners, both in terms of the proportion of homes that are affordable and whether these are defined as gross targets for the eventual homes on a site or as a proportion of net gains.

Net vs gross

I argued in my response to the draft Housing Strategy that, in terms of meeting need, the net gain in low-cost rented homes is far more important than any gross measure for Londoners and Assembly Members who want to monitor the Mayor's progress.

In discussion with the Housing Committee, officers have confirmed that the percentages given in H5 are currently gross, saying: "The 50 per cent would be 50 per cent of the total number of homes in the planning application. This is a policy for a planning application".

Without a clearer and stronger policy here taking account of the potential loss of homes as part of applications, the Mayor is risking too many new housing developments being targeted at estates and areas with existing homes, while claiming to support the strategic goals of the plan.

Without planning requirements taking the loss of these existing homes into account, we could see far less actually new affordable housing being provided than if net measures were used here instead.

Proposed amendments to policy H5 (changes highlighted in bold):

H5 A – The strategic target is for **65** per cent of all **net** new homes delivered across London to be affordable.

H5 A (3) – affordable housing providers with agreements with the Mayor delivering at least **65** per cent **of net new** affordable housing across their portfolio.

H5 A (4) – public sector land delivering at least **65** per cent **net new** affordable housing across its portfolio.

H5 A (5) – strategic partners with agreements with the Mayor aiming to deliver at least **65** per cent **net new** affordable housing across their portfolio.

Key performance indicators

The current London Plan key performance indicator (KPI) for affordable housing is given in net numerical gains. However, the draft London Plan has changed the relevant KPI to this gross measure: “Positive trend in percentage of planning approvals for housing that are affordable housing (based on a rolling average).” This also needs to be amended to enable progress towards net gains to be monitored and the Mayor held to account.

New council homes for London. MQ 2017/3000 http://questions.london.gov.uk/QuestionSearch/searchclient/questions/question_294715

Consultation response expected to be posted at http://www.londontenants.org. From analysis here: http://www.londontenants.org/publications/reports/10%20years%20-%20housing%20targets%20(FF).pdf

Oral evidence from GLA officers. Item 5, Housing Committee, London Assembly 23 Jan 2018 https://www.london.gov.uk/moderngov/ieListDocuments.aspx?CId=302&MId=6213&Ver=4

User: Arcadis LLP

Policy H5 Delivering Affordable Housing

The requirements set out for affordable housing are more onerous than those currently set out and particularly onerous for public sector land and Strategic Industrial Locations. To achieve these requirements will impact scheme viability and therefore ultimately result in an adjustment of land value. This creates uncertainty going forward and puts more pressure on land already owned. The practical result of this will be a slowdown in overall development and activity which will diminish the number of total new homes delivered and thus the number of affordable homes delivered.

Mixed tenure communities are essential to ensure that we do not re-create the environments for social deprivation that we are currently trying to replace and regenerate.

There should be greater flexibility in the plan that will promote development if there is a real intention to increase the total number of homes delivered across the London.

User: Ms Meenakshi Sharma

H5

The strategic target is for 50 per cent of all new homes delivered across London to be affordable. Specific measures to achieve this aim include:

4.5.5 Affordable housing should be delivered on site to help deliver mixed and inclusive communities. Affordable housing should only be accepted as an **off-site** contribution in exceptional circumstances where it can be robustly demonstrated that affordable housing cannot be delivered on-site or where an off-site contribution would better deliver mixed and inclusive communities than an on-site contribution.

4.5.9 To avoid incentivising off-site provision or in lieu contributions, agreements for this should provide no financial benefit to the applicant relative to on-site provision and should include **review mechanisms** in line with the Viability Tested Route. The policy target for schemes delivering off-site affordable housing or in lieu contributions is 50 per cent affordable housing provided across the main site and any linked sites when considered as a whole.

These strategic targets mean nothing if the viability assessment 'get out' clause remains. We have not achieved any meaningful housing during the last London Plan and this London Plan has no 'teeth' to change the situation. Viability needs to be challenged at the outset. If a development is not 50% affordable viable - don't do it. It does more harm than good. Where is the GLA analysis of what has happened in the last 10 years borough by borough? Where has the money in lieiu gone? We have found in Redbridge, off-site contributions are a deal stitched up by the developers and the Councils, with little benefit for the residents. These sort of developments with money in lieiu should not be allowed. We want affordable housing not money for basic services the government should be funding.

We have experience of the review mechanisms, which are a toothless irrelevance. A Sainsbury development for 700 flats with 4% affordable housing was agreed by Redbridge Council with a review mechanism. Even the consultant for Sainsbury at the appeal enquiry admitted, it was highly unlikely that any further affordable housing would be forthcoming, given the low profit they were making and that their 20% profit margin would have to be met before any other commitment could be considered.

User: McCarthy and Stone Retirement Lifestyles Ltd.

H5 (161) - Delivering Affordable Housing

If the Mayor is serious about increasing the overall supply of retirement housing, then an exemption from this policy is required for specialist housing for older people. We submit that this policy is discriminatory, given the unequal effects it has on the ability of elderly people to gain access to appropriate accommodation. Late Review makes most of the schemes we, as a group, are seeking to bring forward in London very much riskier in financial terms to the point that they are currently stalled.

It is considered that the GLA view off-site delivery by retirement housing to be their 'choice'. The evidence presented by the Mayor to justify this statement is considered to be fundamentally flawed. The reality of the situation is that it is impracticable to provide affordable housing on typical older people's housing sites in a London context. There are valid reasons for this including management costs, affordability and site design constraints making it impossible to accommodate separate management arrangements on often small constrained previously developed sites.

Paragraph 4.5.2 demonstrates how the threshold policy was introduced through SPG in advance of the policy through the DLP. The Mayor has therefore introduced policy early through SPG which is contrary to national guidance and unlawful. We have jointly submitted a legal challenge to this effect.

The supporting text of the DLP further demonstrates how the Mayor fails to comprehend the impact the application of this policy has on housing proposals for older people. Again, we have jointly submitted a legal challenge to this effect.

Currently, the retirement sector overwhelmingly agrees with almost all Local Planning Authorities that, where viable, off site contributions in the form of financial contributions are the best solution to addressing housing need.

Paragraph 4.5.6 of the DLP sets out that in respect of cash in lieu contributions, these should be accepted "in even more limited circumstances". Once again, the DLP appears to promote retirement housing provision on one hand and then misunderstand how it can be viably provided in terms of other DLP policy.

In line with national policy, review mechanisms on single phase proposals should not be promoted as this increases the risk that such

proposals will not come forward.

Objection: This policy is not positively prepared. The approach detailed has not been found to be viable for older persons' accommodation and is neither justified nor effective. We also consider the policy to be inconsistent with national planning policy as it is overly prescriptive for a strategic document. We respectfully request that it should be amended or removed.

User: Fuel Poverty Action

5.1 Most types of ‘affordable housing’ do not meet the needs of households with below median income levels. Policy H5 fails to address this. It sets a target for only 15% of homes delivered to be social rented and leaves boroughs to determine whether there may be any additional.

Housing is not affordable if you can’t afford to heat your home. High rents can leave people not only at risk of eviction, but in many cases unable to pay their bills, or keep prepayment meters topped up. And expensive heating systems or poor insulation can leave people unable to pay their rent or to keep up with mortgage payments.

We do not accept the GLA’s definition of “affordable” housing which includes: Social Rented, Affordable Rented, and Intermediate Housing. In our opinion, the only one of these which comes close to being truly affordable is Social Rented accommodation. At 80 percent of market rent, “affordable rent” is not affordable for many, particularly those living in inner city London. Given that the upper end for “intermediate” homes are households whose annual income is up to £80,000, we do not believe these homes can be considered “affordable”.

FPA have serious concerns about how truly affordable “affordable” housing can be considered (see our comments on H5). As we said, to be considered truly affordable, people must be able to afford to heat their homes.

It is stated that The Mayor’s preferred mix for affordable housing tenure is 30 percent low cost rented (Social Rent/ London Affordable Rent), 30 percent intermediate products (including London Living Rent and London Shared Ownership), and 40 per cent to be determined by the relevant borough based on identified need.

Although the Mayor’s “presumption” is for the 40 per cent determined by the local borough to focus on Social Rent/ London Affordable Rent, this is not a requirement. Given constraints on local authority budgets, to meet their affordable housing targets, councils are likely to prefer to choose to focus on intermediate products. Given that the SHMA assesses the need for 47% low-cost rented to meet London’s need (with just 18% intermediate), the requirements set out in policy should reflect this. The very cold winter this year has brought home to many the fact that increasing numbers of homeless people freezing in shop doorways at night is totally unacceptable and cannot continue.

FPA knows that the more income that people are forced to pay on rent, the less they will have available to spend on heating their homes. It is crucial that the mix of affordable housing focuses on housing that the majority of London households can afford, with a proportion for Social Rent in proportion to need.

User: Abdul-Nasser JG Baston

I am concerned that Mayor Sadiq Khans plan for the metropolis, doesn't include building genuine social housing. I'm informed by social housing campaigners, that so-called affordable housing is typically let at £223per week for a 2 bed flat. This compares with existing social housing let at £ 103 per week.

The health and social costs of poor housing, falling disproportionately on the shoulders of poor people, the very people creating the wealth in goods and services, which keep our city going.

User:	London Borough of Hammersmith and Fulham

How boroughs choose to account for this funding should be at the discretion of each borough. Nominations arrangements will need to be reciprocal for offsite out of borough pooling of contributions.

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User:	Buckinghamshire County Council

Also support and welcome the aspirations of the Plan to deliver affordable housing to meet the need of those who are unable to access market. If more affordable homes are delivered in London, this may reduce pressure for home in the County from household who move to the county for reason of affordability.

Welcome the aspirations to deliver more affordable in partnership with developer who enter into an agreement and development on public sector land. This is a positive direction of the Plan and BCC supports such policy and commitment

User: Mrs Sue Davies

National policy changes are needed on the number of vacant houses that are to be found throughout the capital. Its a national scandal that so many in central London are empty and owned overseas. How much do we need these parasitic investors? This is private enterprise gone mad. If they do own them they should be obliged to rent them out or we should be charging them exhorbitant rates to keep them empty. A solution must be found.

We need low rent housing in the centre of London to keep all the services going there:' bussing' workers in daily is not the answer - it creates an even greater underclass - how can there be any sense of community without creating them as mixed employment areas as they once were? You have a lot of work to do here.

User: King and Company Ltd

We broadly endorse the ambition to create a step-change in the delivery of affordable housing. The affordable requirement (in terms of type and tenure) needs to respond to market signals, and will include family homes as well as apartments for young professionals and key workers.

Read in tandem with the threshold approach (under policy H6) we support the ambition to deliver affordable housing that meets local needs and has inherent flexibility to accommodate different vehicles (which might include PRS or help to buy) that result in the delivery of more homes that are well designed and affordable for Londoners.

We would also note that there are a range of competing pressures which will impact upon the deliverability of brownfield sites close to public transport hubs. These will include environmental performance, affordable workspaces and some elements of policy which would resist buildings which are materially taller or occupy more footprint than the existing.

The design challenge is often substantial, but we conclude that the highest priority should be put upon the delivery of affordable housing and workspaces.

User:	Publica

Publica supports the Mayor’s commitment to the provision of genuinely affordable homes, and understands that a broad mix of tenures is important to ensure that London can continue to be home to a diverse mix of people, and remain a vibrant city, with active and well-used streets.

We welcome the commitment to integrating affordable housing into new developments, as this can avoid spatial stratification of the city according to income.

User: The Selby Trust

The Selby Trust is neutral on this policy. We have specific concerns about the requirement for all development on public owned land to deliver 50% affordable homes. Much public land already has users within or on it. This is the case with the Selby Centre which is an independent community centre located on land owned by the local authority. However, despite our specific example this issue has wider instances than just our case eg small shops in low density units, estates etc.

The Selby Trust is very supportive of affordable housing and many of our clients need access to social housing or low cost housing. However, the organisation is occupying buildings on land allocated for mixed use development. The redevelopment of the site cannot afford to cross subsidise a new community facility capable of delivering the full extent of our current services AND 50% affordable housing. As the incumbent we would prefer the policy position of public owned land to recognise that there will be many public owned brownfield sites with infrastructure requirements, existing users needing to be relocated on site (or in other instances elsewhere) and that therefore 50% affordable housing may not be the first priority nor a viable outcome. In our instance no housing redevelopment can take place until new community provision is reprovided and paid for by the enabling development. After this point we consider that 50% affordable housing of any surplus development may be acceptable (in both our and other similar circumstances).

User:	Putney Society

4.5.1 We support the Mayor’s principle of increasing supply of affordable housing for a sustainable city. However we are concerned by how little of this seems to be actually affordable for the low paid workers on whom the city relies.

User: Home Builders Federation

Policy H5: Delivering Affordable Housing

Generally we are supportive of the approach set out in the policy. The affordable housing challenge is severe in London although we question the extent to which this can be resolved if the London Plan establishes a very ambitious 50% affordable housing target that many sites will struggle to achieve. This judgement is based upon the HBF having considered the viability evidence that supports the local plans of the London LPAs over the last five years. An unrealistic target, might just delay the approval of housing schemes, thereby acerbating the affordability crisis.

We acknowledge that the 50% figure is a strategic target that the Mayor hopes will be achieved by publicly owned sites providing at least 50-60% affordable housing to compensate for lower rates of affordable housing supply on sites that are to be developed by the private sector.

Part B of the Policy is unsound because it conflicts with national policy.

Part B should be amended to reflect the Written Ministerial Statement of the 28 November 2014 which was introduced to provide support for small developers, custom and self-builders. The policy should reflect the exemption from affordable housing contributions and other tariffs requirements for schemes of ten units and fewer or where the gross floor area is no more than 1,000spm. WE consider that it is necessary for the Mayor to align with the national policy to achieve the ambitious small sites targets that are in the London Plan.

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User: EngineersHRW

Policy H5 Delivering affordable housing

Clause H5-A. Amend **50% strategic target to 65%.**

3) Amend **50% to 65%.**

4) Amend **50% to 65%.**

5) Amend **60% to 65%.**

Note. This rebases the affordable housing targets on the evidence base as in the Strategic Housing Market Assessment. It also reinserts strategic guidance on the setting of affordable housing by boroughs in their local Plans which has been omitted from the plan draft. This reinsertion is critical as otherwise boroughs may set their own affordable housing targets too low, which would put at risk the delivery of the London-wide strategic target.

User:	The Pinner Association

Is the “target” of 50% “affordable housing” achievable in practice? In our experience, even with the current more modest affordable housing requirements, developers provide viability assessments that conclude that a site cannot be developed with any affordable housing.

User:	Royal Borough of Kensington and Chelsea

4.5 Policy H5 Delivering affordable housing

Policy H5 sets out a strategic target for 50% of all new homes delivered across London to be affordable. It then refers to the ‘threshold approach’ to affordable housing (set out in Policy H6) in delivering this strategic aim without the use of public subsidy. The threshold approach to affordable housing has already been introduced in the Mayor’s Affordable Housing and Viability SPG. The Council is in the process of adopting a similar policy on affordable housing through its Local Plan Partial Review and supports this approach.

User: London Borough of Islington

Draft London Plan Policy

Policy H5 – Delivering affordable housing

Islington Response

We support this policy and in particular the reference in para 4.5.4, that delivery of overall housing targets should not be relied on as a reason for reducing affordable housing delivery. We commonly see the argument that “50% of nothing is nothing” as an attempted justification for accepting low amounts of affordable housing, but para 4.5.4 provides a direct rebuttal to such arguments.

User:	Kew Society

Affordable housing should be provided on site (paragraph 4.5.5 of the plan), with cash in lieu the exception. Viability assessments where required should be published for public view and comment.

User:	Defence Infrastructure Organisation

Policy H5 sets a strategic target for 50% of all new homes delivered across London to be affordable with a specific target in part 4 of the policy of 50% of housing on public sector land.

MOD supports the delivery of affordable housing, however, as outlined in relation to Policy GG4 B) above and with regard to the increased development costs to which MOD sites are often subject, it is considered that flexibility in this policy will be required in order to ensure maximum delivery of affordable housing for the benefit of the public. In particular where sites have limited capacity for affordable housing full consideration of the off site provision of affordable housing will be required to allow for a more strategic approach to its delivery.

User: Association of Consultancy & Engineering

Currently, the Mayor’s targets for delivering affordable housing are not ambitious enough. There is an identified need in London for 43,500 of the 66,000 to be affordable homes, which equates to 66% of London’s overall need. Current targets are set at a minimum of 35%. If the Mayor and London boroughs are able to achieve success in reaching its targets, it will only reduce the shortage of housing in London. A tougher target should aim to eradicate the current affordable housing need rather than maintaining or reducing the current gap. The target should therefore be closer to 66% in the short term, in line with London’s needs.

ACE believes the Mayor’s efforts to deliver more genuinely affordable housing in London cannot sacrifice the need for these homes to be of high quality and conducive to the life of London’s communities. Affordable housing needs to be seen as an investment, and spending more upfront to build sustainable, well designed and inclusive homes will reduce costs over the life of a house, positively contribute to environmental objectives and provide a social value to residents and the community. The Mayor must avoid overseeing the development of cheap, poor quality and sub-standard housing for Londoners, as this provides an inadequate solution to the housing supply shortage, particularly with land available for development in equally short supply.

ACE agrees with the principle that cash in lieu payments should only be accepted as a last resort and not detrimental to the provision of affordable housing overall. Whilst cash in lieu payments may result in affordable housing in other areas, it presents an easier way for developers to avoid building the necessary housing stock that London needs. To further discourage this, any cash in lieu payments should attract an interest rate applied on top that is proportional to the size of the development. This would provide a significant disincentive for developers to pursue cash in lieu alternatives and would raise additional funding that could be used for further affordable housing gains.

ACE believes the plan must not lose sight of the basic notion on why housing is important to people and communities. Having somewhere appropriate to live that is safe and secure is a key element of the ‘hierarchy of needs’, and we limit a person’s quality of life and ability to contribute to society if we are unable to provide appropriate housing. Inaction on London’s housing need risks the gentrification of areas and pushes more and more people out of the city because they simply cannot afford to live there. This then has severe impacts on the constitution of London’s communities, workforce and has larger consequences for London as a centre of economic activity.

User: Galliard Homes

Galliard objects to the 50% affordable housing target outlined in Policy H5 – Delivering affordable housing. We agree that the inclusion of affordable housing, alongside other land uses (where appropriate), is essential to ensure balanced communities are provided across the capital. However, it is well understood that a strategic target of 50% has significant viability implications that have never been achieved by the private sector, when initially promoted by former Mayor Ken Livingstone at a time was grant funding was more readily available.

This 50% target will be further under threat when considering the aforementioned design policies and intensification aspiration, which bring funding costs and risks when building tall buildings due to the singular nature of the build. The Plan therefore assumes that a private developer is able or willing to accept a greater risk of development to achieve an unattainable (in most cases) target. With greater risk comes great reward, but greater risk with a known reduced reward that is under threat, makes for unviable development.

If Policy demonstrated awareness or acknowledged the commercial realities of development, and the reference to review mechanisms at paragraph 4.5.9 would be more balanced in its approach, meaning there should be no additional provision than policy; there should be no additional benefit received than equivalent to policy; and in a downward market the offer is flexible to ensure the developer receives a competitive return to deliver the scheme; the policy would be more practicable and adaptable in its application.

Policy H5 should set the minimum strategic affordable housing target that is both reasonable, practicable and viable for applicants. Further testing and engagement with applicants and developers should be had to understand what the market can accommodate. Applicants ultimately want certainty regarding delivery, but 50% is unviable to deliver, so certainty is never achieved. A more considered position would secure certainty and that in turn assists delivery.

The additional implication of this policy is its effect on land value. It is well understood that the Mayor’s Housing SPG (August 2017) has sought to secure a minimal level of affordable

housing such to suppress land values. This higher aspiration of 50% will have a greater affect, such that land owners will hold back sites in a bid to wait for better value. The math is simple – without land there is no delivery, no housing, no affordable housing, no employment and no wider public benefits.

The delivery of public land where it is the government body's responsibility to provide in the public interests, can provide 50% affordable. Since World War II, private developers have consistently provided the same level of housing, the acute shortage occurred once the public sector stopped providing housing and relied on the private sector to fills its shortfall. It is accepted that the private sector can't deliver this level of need and nor can it sustain 50% affordable housing.

User:	City of London Corporation

The emphasis in Policy H5 on the delivery of on-site affordable housing reflects national guidance. Although there is reference to off-site provision or cash in lieu in exceptional circumstances, the City Corporation considers that there should be a greater flexibility over the use of off-site contributions where there are demonstrable benefits such as the delivery of a greater quantum of affordable housing on alternative sites. Such an approach would facilitate the City Corporation’s ambition to deliver additional affordable housing on its housing estates outside of the City of London.

User:	London Funders & Greater London Volunteering

In addition, the question of affordability of housing and services, from the perspective of people who work in the not-for-profit sector, is also an issue affective the vibrancy and sustainability of the voluntary and community sector groups that our communities depend upon. We recognise the commitment to increase affordable housing, though would push for a clearer definition of affordable that takes accounts of the needs of our civil society sector alongside those of aligned sectors.

User:	London Borough of Barnet

Barnet has concerns about the ability to deliver both the 50% strategic London wide affordable housing target as well as the 50% affordable housing to be delivered on public sector sites such as TfL land. This will prove challenging to deliver on some Council owned sites and adopting a numbers led approach would appear to conflict with the design led approach advocated in other policies in the DLP. With the second year of the GLA's 2015 to 2018 Affordable Homes Programme it is noteworthy that a report by BNP Paribas1 on the delivery of affordable homes by London boroughs from 2009 to 2015 found that Barnet had delivered 5,029 affordable homes. Only Tower Hamlets, Greenwich, Newham and Southwark had delivered more. Opendoor Homes, a subsidiary of the Council's ALMO, Barnet Homes, has embarked on the delivery of an initial 320 homes for affordable rent for Barnet residents. Working in partnership and building homes through dedicated companies like Opendoor Homes allows development to be undertaken more freely.

User:	Generation Rent

We are disappointed that the targets for affordable housing share are at 50% when the city's needs are closer to 65%. We hope that the Mayor will find ways to increase this share before the proposed review in 2021, including by exploring how to use green belt land near transport infrastructure, land value capture to secure lower cost land, and bring in other sources of funding.

We are please to see that habitable rooms and floorspace will be considered. Families are particularly underserved by the private rented sector in London, so we would hope that this approach will make building more family homes a more economical option.

User: Caroline Pidgeon

The “strategic target” of 50 percent of all new London homes built during your Mayoralty being affordable does not look feasible. £2.2bn of additional funding is needed annually to achieve your manifesto’s aims[1] and you have not set out how you mean to plug the gap in your finances. It looks increasingly likely that you will not meet your ambition on affordable housing and are unable to come up with innovative solutions to London’s housing crisis.

The draft London plan talks about creating “genuinely affordable homes”, but it is still unclear what that means. Your failure to come to an agreement with the Government about the definition of affordable housing, means that the definition of ‘affordable’ set out in the National Planning Policy Framework (NPPF), applies to the London Plan.[2] The affordability measure being used in the draft plan needs to be clarified so that Londoners have a firm grasp of what affordable housing refers to.

[1] London Assembly Budget and Performance Committee, 22nd November 2017

[2] The NPPF states affordable housing is housing provided at a level at which the mortgage payments on the property are more than rent on council housing, but below market levels. Affordable rented housing applies to rents of no more than 80% of the local market rent.

User: London Assembly Labour Group

Suggested Changes

That the term ‘affordable’ is specifically defined here (and throughout the Plan) to mean the Mayor’s definition of affordable.

Justification for Recommendations

Given the number of definitions of ‘affordable’ housing that London has seen over the years we feel that this Plan needs to be much more specific in each instance of the use of the term ‘affordable’ which type of ‘affordable’ is specifically meant.
We have understood in evidence from the Deputy Mayor for Housing that what is meant throughout the document is “the Mayor’s definition of affordable” as set out in 4.7.3.
However, the Glossary defines affordable as the Government’s definition thus, we believe, leaving sections of the Plan open to interpretation.

We believe the Mayor will agree that risk of misinterpretation, no matter how minimal, is too high to be anything other than entirely specific throughout the Plan as to which version of affordable each instance the term refers to.

User:	Stonewall Housing

POLICY H5/POLICY H8: Stonewall Housing welcomes the London Plan's ambitions to deliver more supply of more affordable housing which includes specific targets for local authorities. However, to ensure that these targets reach all communities it should also include targets for groups that share protected characteristics and not simply the supply numbers. For this to take place the Mayor should encourage all developers and local authorities to collect data on sexual orientation and gender identity to ensure their developments and plans are addressing the needs of our communities.

User: Newham Union of Tenants

1. We are concerned that the Mayor set policy first, in election promises (of 50% ‘affordable housing’) rather than using evidence to inform policy and to then negotiate with Government around the funding required to address London’s housing need.
2. We are concerned that the SHMA identifies households that can afford market rents, but who want to eventually buy a home, as having a need for intermediate housing. This is a departure from the way that SHMAs have been carried out in the past. It significantly contrasts with situations in which households that can only genuinely afford social-rented homes, yet are housed in private-rented homes that they will never be able to afford without the support of housing benefit, but are not deemed to need social rented homes. This treats lower income households with inequality. It results in a higher target for intermediate housing than would previously have been assessed. We note, in addition, that the backlog of need for intermediate housing has fallen considerably since the 2013 SHMA was carried out - from 45,705 to just 4,056. The backlog of need for social rented housing however is now 40 times that of intermediate housing, having more than doubled since 2013.
3. We question the SHMA’s departure from usual practice. We note that Bert Provan, Occasional Senior Research Fellow at the Centre for Analysis of Social Exclusion at the LSE and who worked for many years as a Senior Civil Servant in the DWP and DCLG, assessed quite recently (using DCLG data)[1] that nationally only one in five households that benefit from help to buy schemes (such as shared ownership) have incomes below the median. He also highlights that for three out of five households it simply helped them to buy sooner – but would inevitably have bought.
4. The big question in terms of Policy H5 is ‘affordable to who? So-called ‘affordable’ housing covers housing that a wide range of households with incomes can access from less than £12,000 a year (we note that the average social housing income is on average £17,500 a year) to households earning £90,000 and who are in the top 15% of households in London. ‘Affordable’ housing is thus a subjective term. Sub-market housing is a more accurate description for such a wide variety of tenures.
5. Most types of ‘affordable housing’ do not meet the needs of households with below median income levels. Policy H5 fails to address this. It sets a target for only 15% of homes delivered to be social rented and leaves boroughs to determine whether there may be any additional. The likelihood is that in attempts to deliver 50% affordable housing, boroughs will choose to deliver intermediate housing as more can be delivered for the same cost.
6. The Mayor should set a strategic London-wide target as has occurred in previous London Plans, in order that London-wide need might be delivered.
7. We propose:

- The title of policy H5 be renamed, more accurately, ‘sub-market housing’.
- The policy should refer by name to the different types of sub-market housing.
- Targets should be set that address the need identified in the SHMA but reverting to the previous way of assessing need for intermediate housing (that is for households not able to meet the cost of market homes – including private renting).
- This should be 65% sub-market housing, comprising 50% social / low cost rented homes and 15% intermediate. It should be noted that 30,973 social / low-cost rented homes need to be delivered annually over the next 25 years in order to deal with existing and backlog of need. Delivery of less than will continue to increase the backlog of need and increase the number of years that it will take to address the backlog. It should say that if the backlog of need were to be addressed over a 10-year period the social housing target would need to be 62% (of all homes) or higher.
- The Mayor should renegotiate with the Government around the use of all affordable housing grant to enable it in total to be used to deliver social-rented homes.
- The Mayor should require that all section 106 to be used to deliver social-housing.
- Intermediate housing should be delivered without affordable housing grant.

[1] http://blogs.lse.ac.uk/politicsandpolicy/how-help-to-buy-helps-the-privileged/

User: London Borough of Lambeth

Lambeth supports the principle of the threshold approach to affordable housing and agrees with the Mayor that, over time, this is likely to embed policy requirements into land values and help avoid protracted negotiations about viability based on imperfect information. Lambeth also supports the initial thresholds proposed in the draft new London Plan, subject to their early review in 2021 to allow for consideration of changing market factors and evidence on delivery across London and across different types of land.

Lambeth supports the Fast Track criteria that require on-site delivery of affordable housing and compliance with borough-level tenure split policies. It is essential that these criteria are upheld consistently and robustly in decision-making and that the principles of the distinction between the Fast Track route and the Viability Tested route are not eroded over time. See also the comments under policy DF1 about risks to other policy requirements and obligations.

However, the new London Plan needs to be much clearer about how the different thresholds for public sector and private sector land will apply when land is changing hands between sectors. For example, if a private developer is buying public sector land presumably the 50 percent threshold applies to that land even after it has changed hands. How will this be monitored and secured in practice? Similarly, if a public sector body is buying land in private ownership (to achieve a local-authority-led regeneration project for example), it should be the 35 per cent threshold that applies in that case. If not, a public sector body will never be able to compete on a level playing field in the purchase of land with private sector bodies. These scenarios need to be carefully considered and further guidance provided for the threshold approach to work effectively.

User: Greystar Europe Holdings Ltd

Policy H5 ‘Delivering Affordable Housing’ is broadly welcomed, and largely follows on from the ‘Homes for Londoners’ SPG of August 2017. However, we would like to emphasise a few specific points:

o BTR development is able to deliver housing to the market at a much quicker rate than standard residential for sale product. On this basis, the BTR sector has the ability to significantly increase the supply of affordable units over the short to medium term.

o The combination of this contribution and the financial constraints of BTR’s previously recognised ‘distinct economics’ should be recognised through a modified affordable housing target and viability tested threshold. See also our response to Policy H6 below.

o It should also be noted that even open market BTR units are generally more attainable to people who do not qualify for affordable housing, in the context of not requiring the sort of significant deposits, stamp duty or other transaction costs which access to a ‘for sale’ market home would require;

User:	Bexley Labour Group

vi. The group agrees with the Mayors key strategic housing commitment for 50 per cent of all new homes built to be genuinely affordable – to be achieved through planning, investment and building on public land. We strongly support measures to return social rent products at a rate that local people can afford.
vii. The group agrees with the premise of offering private developers a “fast-track route” to planning permission if they reach a minimum of 35 per cent affordable.

User: London Tenants Federation

4.5.1 Policy H5 Delivering affordable homes

We are concerned that the Mayor set policy first, in election promises (of 50% ‘affordable housing’), rather than using evidence to inform policy and to then negotiate with Government around the funding required to address London’s housing need.

4.5.2 We are concerned that the SHMA identifies households that can afford market rents, but who want to eventually buy a home, as having a need for intermediate housing. This is a departure from the way that SHMAs have been carried out in the past. It significantly contrasts with situations in which households that can only genuinely afford social-rented homes, yet are housed in private-rented homes that they will never be able to afford without the support of housing benefit, but are not deemed to need social rented homes. This treats lower income households with inequality. It results in a higher target for intermediate housing than would previously have been assessed. We note, in addition, that the backlog of need for intermediate housing has fallen considerably since the 2013 SHMA was carried out - from 45,705 to just 4,056. The backlog of need for social rented housing however is now 40 times that of intermediate housing, having more than doubled since 2013.

4.5.3 We question the SHMA’s departure from usual practice. We note that Bert Provan, Occasional Senior Research Fellow at the Centre for Analysis of Social Exclusion at the LSE and who worked for many years as a Senior Civil Servant in the DWP and DCLG, assessed quite recently (using DCLG data)9 that nationally only one in five households that benefit from help to buy schemes (such as shared ownership) have incomes below the median. He also highlights that for three out of five households it simply helped them to buy sooner – but would inevitably have bought.

4.5.4 The big question in terms of Policy H5 is ‘affordable to who? So-called ‘affordable’ housing covers housing that a wide range of households with incomes can access from less than £12,000 a year (we note that the average social housing income is on average £17,500 a year) to households earning £90,000 and who are in the top 15% of households in London. ‘Affordable’ housing is thus a subjective term. Sub-market housing is a more accurate description for such a wide variety of tenures.

4.5.5 Most types of ‘affordable housing’ do not meet the needs of households with below median income levels. Policy H5 fails to address this. It sets a target for only 15% of homes delivered to be social rented and leaves boroughs to determine whether there may be any additional. The likelihood is that in attempts to deliver 50% affordable housing, boroughs will choose to deliver intermediate housing as more

can be delivered for the same cost.

4.5.6 The Mayor should set a strategic London-wide target as has occurred in previous London Plans, in order that London-wide need might be delivered.

4.5.7 We propose:

- The title of policy H5 be renamed, more accurately, ‘sub-market housing’.

- The policy should refer by name to the different types of sub-market housing.

- Targets should be set that address the need identified in the SHMA but reverting to the previous way of assessing need for intermediate housing (that is for households not able to meet the cost of market homes – including private renting).

- This should be 65% sub-market housing, comprising 50% social / low cost rented homes and 15% intermediate. It should be noted that 30,973 social / low-cost rented homes need to be delivered annually over the next 25 years in order to deal with existing and backlog of need. Delivery of less than will continue to increase the backlog of need and increase the number of years that it will take to address the backlog. It should say that if the backlog of need were to be addressed over a 10-year period the social housing target would need to be 62% (of all homes) or higher.

- The Mayor should renegotiate with the Government around the use of all affordable housing grant to enable it in total to be used to deliver social-rented homes.

- The Mayor should require that all section 106 to be used to deliver socialhousing.

- Intermediate housing should be delivered without affordable housing grant.

User: London Borough of Merton

(please also refer to Policy H2 above)

Support with amendments The intentions of Policy H5 are supported however requiresclarity to improve its effectiveness. Policy H5 proposes a new London wide affordable housing target of 50% (10% increase per annum on the current target) and specifies a number of specific measures to achieve this including public sector land delivering a minimum of 50% affordable housing.

It is considered that Policy H5 should state whether the affordable housing target is **net** or **gross** and should be included within the policy to improve transparency and understanding. The aim of the policy is to increase affordable housing provision therefore it is considered that the policy should state that the target is net (or additional). Suggested wording as follows: *The strategic target is for 50% of all **net** (i.e. additional) new homes delivered across*
London to be affordable…

The policy should clarify that the whole scheme will be assessed - not just regarding the additional proposed units – in determining whether the *maximum reasonable* Affordable housing provision is proposed and that proposals resulting in net loss will be unacceptable. Similarly to ensure clarity Policy H5 should specify whether the strategic target refers to units, habitable rooms and /or floorspace. There appears to be inconsistency between the Mayor's Affordable Housing Viability SPG and Draft London Plan housing policies and supporting paras concerning how affordable housing requirements are measured.

Draft London Plan supporting para 4.6.3 requires the affordable housing threshold targets set out in Policy H5 to be measured as habitable rooms by stating: T*he percentage of affordable housing on a scheme should be measured in habitable rooms to ensure that a range of sizes of affordable homes can be delivered, including family-sized homes.*

It would help in the comprehension of Policy H5 to clarify the relationship between the habitable rooms measurement approach and the 50% strategic *affordable homes target* requirement – as habitable rooms are not homes but components of homes. In particular explanatory wording to help understand the statement at supporting para 4.6.3 (of policy H6) that *habitable rooms should be of comparable size when averaged across the whole*
development… would be particularly helpful.

User:	London Borough of Haringey

The Council supports the underlying principle of this policy. Haringey is committed to the delivery of affordable housing as the first priority in residential led schemes. But some variation around this general principle should be able to be applied, where appropriate, to ensure that Councils can make the most appropriate use of their land having regard to a range of other planning objectives such as cross-funding the provision of new / improved infrastructure or as a catalyst for town centre renewal or employment-led regeneration.

User: RICS

Delivering affordable housing

With regards to delivering **Policy H5** (affordable homes), RICS agree with the Mayor's suggestion that there should be more affordable housing. However, the long-term goal should be to ensure that the market delivers affordable homes for most people. In the short term however, delivery of affordable housing is made more viable with the financial support, available through grant funding via the affordable homes programme. The Mayor can again use the GLA's land holdings to further support the delivery of affordable homes through joint ventures or direct commissioning.

We recognise the need for the GLA, under government guidelines, to get the best returns from sales or use of public assets. We would encourage the Mayor to talk with RICS about developing thinking on approaches to disposal or use of public assets at less than best financial considerations where non-financial benefits exist and cannot be properly quantified. These could be anything from supported or affordable housing to delivering schemes that retain the character of an area.

There is also scope for the GLA to use its land holding more creatively. For example, this could entail allowing developers or housing associations to build on and manage homes on public owned land without purchasing the land, thereby substantially reducing the cost. The freehold for the land could remain with the GLA and leasehold given with covenants to the developer alongside agreed amount of ground rents to be paid based on negotiations and delivery of rental properties at different price points. Again, we invite the GLA to discuss options with the property sector.

User: London Borough of Barking & Dagenham

The Council supports the Mayor of London's focus on delivering more genuinely affordable housing. Affordable housing is essential to improve quality of life, health and wellbeing and a reduction in inequalities within the capital. Be First's Business Plan commits it to building 1595 new affordable homes in the borough by 2023 to ensure residents are not priced out of the borough. On top of this is supply from third party sites such as Barking Riverside and Beam Park.

The Council is concerned that the focus on delivering 50% of new homes as affordable on public land may be at the expense of providing genuinely affordable new homes. On Barking Riverside 5% of the homes are at 50% market rents and at Beam Park 10% will be at London Affordable Rent. The Council in future would prefer the amount of target or London affordable rent homes to be prioritised over the overall amount of affordable housing achieved. Table 4.3 of the London Plan reinforces this which shows that by far the greatest need is for low-cost rent homes, data from the Council's own Strategic Housing Market Assessment, and the fact the borough's housing register currently stands at 5893 people.

Additionally, the Mayor needs to develop (with partners) definitions for all housing needs and be more explicit about the links to the objectives of the health inequalities strategy.

User: London Borough of Lewisham

As noted in our response to the consultation on the Housing Strategy, we are supportive of the Mayor's approach to his ambitious commitment to affordable housing. It reflects our own ambitious programme of securing affordable housing and our commitment to deliver 500 new Council homes by the end of 2018.

It is however recognised that GLA grants and other funding sources for affordable housing will be essential if the 50% aspirational target in policy H5 is to be met. Without this level of support, there is potential for schemes which may generate a range of wider regenerative benefits to become unviable. This aspirational target may also be difficult to achieve on public sector land where there is often a need to re-provide a range of other infrastructure and services, often at significant cost to the overall development and viability. This may include on key town centre sites where proposals are looking to enhance the retail, civic, employment and leisure function of the town centre whilst providing an environmental uplift and affordable homes, such as Catford town centre.

Further consideration should also be given to:

- How faster build times can be implemented given that it is out of the Council's control. For grant funding programmes, partial funds can be released when construction contracts are in place, with the remainder received if the scheme is completed on time.

User:	London Borough of Brent
The policy is supported.	

User: Save Swiss Cottage

H5 Delivering affordable homes

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5.2 We are concerned that the SHMA identifies households that can afford market rents, but who want to eventually buy a home, as having a need for intermediate housing. This is a departure from the way that SHMAs have been carried out in the past. It significantly contrasts with situations in which households that can only genuinely afford social-rented homes, yet are housed in private-rented homes that they will never be able to afford without the support of housing benefit, but are not deemed to need social rented homes. This treats lower income households with inequality. It results in a higher target for intermediate housing than would previously have been assessed. We note, in addition, that the backlog of need for intermediate housing has fallen considerably since the 2013 SHMA was carried out - from 45,705 to just 4,056. The backlog of need for social rented housing however is now 40 times that of intermediate housing, having more than doubled since 2013.

5.2 We question the SHMA’s departure from usual practice. We note that Bert Provan, Occasional Senior Research Fellow at the Centre for Analysis of Social Exclusion at the LSE and who worked for many years as a Senior Civil Servant in the DWP and DCLG, assessed quite recently (using DCLG data) (footnote 4) that nationally only one in five households that benefit from help to buy schemes (such as shared ownership) have incomes below the median. He also highlights that for three out of five households it simply helped

them to buy sooner – but would inevitably have bought.

5.3 The big question in terms of Policy H5 is ‘affordable to who? So-called ‘affordable’ housing covers housing that a wide range of households with incomes can access from less than £12,000 a year (we note that the average social housing income is on average £17,500 a year) to households earning £90,000 and who are in the top 15% of households in London. ‘Affordable’ housing is thus a subjective term. Sub-market housing is a more accurate description for such a wide variety of tenures.

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5.6 We propose:
• The title of policy H5 be renamed, more accurately, ‘sub-market housing’.
• The policy should refer by name to the different types of sub-market housing.
• Targets should be set that address the need identified in the SHMA but reverting to the previous way of assessing need for intermediate housing (that is for households not able to meet the cost of market homes – including private renting).

• This should be 65% sub-market housing, comprising 50% social / low cost rented homes and 15% intermediate. It should be noted that 30,973 social / low-cost rented homes need to be delivered annually over the next 25 years in order to deal

with existing and backlog of need. Delivery of less than will continue to increase the backlog of need and increase the number of years that it will take to address the backlog. It should say that if the backlog of need were to be addressed over a 10-year period the social housing target would need to be 62% (of all homes) or higher.

• The Mayor should renegotiate with the Government around the use of all affordable housing grant to enable it in total to be used to deliver social-rented homes.

• The Mayor should require that all section 106 to be used to deliver social-housing.

• Intermediate housing should be delivered without affordable housing grant.

(footnote 4) http://blogs.lse.ac.uk/politicsandpolicy/how-help-to-buy-helps-the-privileged/

User:	London Borough of Hounslow

We strongly support policies H5, H6 and H7 in creating a housing market that works better for all Londoners through the delivery of more homes, a strategic target of 50% affordable housing and homes that meet high standards of design. Hounslow Housing Market assessment has identified a demand for 1898 homes of which 48% need to be truly affordable.

User: London Borough of Bromley

The Council notes the overall approach in aiming to deliver an increased level of affordable housing across London, especially if grant is made available for relevant schemes / providers listed in the policy. This is crucial in light of schemes needing to demonstrate that they have sought to increase the level of affordable housing beyond the level that would otherwise be provided. Reference to the levels of funding likely to be made available or relevant programmes should be included within the supporting text of the policy.

There is some uncertainty though whether the fast-track route will incentivise developers not to enter into the viability tested route which could result in the planning process not being sped up.

Additional guidance is required in relation to off-site and cash-in-lieu circumstances.

User: London Councils

London's boroughs are supportive of the ambitious strategic target for 50% of new housing delivered across London to be affordable. As previously stated in the London Councils response to the Mayor's recent Affordable Housing and Viability Supplementary Planning Guidance, there is broad support across London for the threshold approach to securing affordable housing and policy around
encouraging the use of grant to secure further affordable housing. While the threshold approach to securing affordable housing may mean that some individual privately owned sites may not secure the maximum level of affordable housing, the approach is likely to increase provision across the board and delivery will be speeded up.

There is concern from some boroughs that a requirement for them to deliver 50% affordable housing across their land portfolio may hinder development schemes in their pipeline. This policy can be clarified to make clear whether this portfolio approach to affordable housing provision development will apply to development carried out by housing companies which are owned by London's boroughs and on joint venture sites.

This is a particular concern on estate regeneration sites that there is contradictory policy between this policy and policy H10. Policy H10 sets less demanding targets for estate regeneration stating that where loss of existing affordable housing is proposed this should generally involve uplift in affordable housing provision (referring to demolition and replacement). The policy further indicates that the delivery of additional affordable housing should be maximised.

London Councils believes that estate regeneration schemes should be assessed on the basis of policy H10 rather than policy H5 and this should be made clear in each of the policies. When considering individual estate regeneration schemes or larger regeneration programmes on public land, it may not be possible in each case to deliver 50% affordable housing. What can be achieved will depend on the tenure of existing homes on the site, and whether they need to be replaced or refurbished. The GLA should clarify this position in the published plan and link the Plan to guidance in the Good practice guide to estate regeneration document, currently out for consultation. London Councils will be

responding separately to the proposals set out in that document.

The SHMA identifies that that to meet housing need in London, 65% of the housing delivered in London needs to be in affordable tenures and that 47% housing should be low cost rented. There is currently a disconnect between the types of affordable housing that are required and the tenures that affordable units are being delivered in. The GLA and boroughs need to jointly consider how a greater amount of social and low cost rented units can be delivered.

User: Old Bermondsey Village Neighbourhood Forum

Aside from a marked reduction in the importance given to neighbourhood planning, our overarching criticism is that there is no clear instrument that checks development targets demanded of local authorities (especially in Opportunity Areas) by policies GG2, H1, H2, D6 and D8 against the importance of the preservation and enhancement of the social and built fabric of London highlighted in policies H5, H6 HC1, HC3, HC5, and HC7.

We think there is a need to balance the opportunities offered to local authorities in the DLP by way of identifying, protecting and nurturing the distinct identity of areas as the basis for sustainable development versus the potential abuse of these opportunities by planning departments – in particular where potential exists for opportunity areas, site allocations and cultural quarters to become used as guises for insensitive profit driven high-rise and monouse (housing dominated) development.
Neighbourhood Forums should be empowered to have a better part to play in this by the DLP.

The New Southwark Plan for example has just completed formal consultation ignoring widespread calls for a borough wide local list. It contains deeply unsound Area Visions and Site Allocation Policies that ignore local consultation and make no reference to key guidance like Historic England's Advice Note 3 for example.

User: London Borough of Tower Hamlets

We are extremely supportive of the new higher affordable housing targets.

It would be useful for the supporting text to clarify who ‘strategic partners’ are or could be.

The policy needs to consider the monitoring of parts 3, 4 and 5. It is presumed that these portfolios could be across a number of boroughs and schemes and therefore it is unclear how boroughs are meant to assess any individual application from such an applicant in relation to meeting this target.

Finally, the policy needs to consider the definition of public sector land. Is this any land which is or has been (in which case across what timeframe) in public sector ownership? In boroughs where a high receipt of where the delivery of affordable housing is a lower priority, the policy as currently worded risks the transfer of public sector land into Joint Purpose Vehicles or private ownership in advance of planning permission being sought.

User: Royal Borough of Kingston

Generally supportive. However the achievement of such a target is highly aspirational and that it will be well beyond the end of the plan period, if ever, for this to be achieved. This is especially so, because of the reliance on small-sites to deliver the strategic housing target. Such sites are not likely to bring forward affordable housing (AH). RBK also has concerns about the inclusion of a 50% AH requirement from public land. The duty to tackle homelessness and cost of temporary accommodation and other costs associated with homelessness and insecure/inadequate housing are strong drivers for local authorities to maximise delivery of AH where possible on their own sites. However, residential development is often used by public services to fund other community benefits which may not be viable with a 50% AH requirement. In such circumstances, this approach will force local authorities to transfer site ownership to the private sector before developing, which may result in poorer outcomes for the community overall. Flexibility should be provided where there are demonstrable community benefits which would otherwise not be able to be delivered. RBK supports the intent to ensure that affordable housing is delivered on site, but seek further guidance regarding what circumstances would be appropriate for off-site delivery.

User: London Borough of Waltham Forest

We welcome the strategic target for 50% of all new homes to be affordable and are proactively supporting the Mayor in this. However, we consider that the Mayor and the GLA needs to recognise that this target is challenging. We want to meet this challenge but will need support from Mayor, GLA and the Government in terms of resource and funding. The policy should clarify what support, resource and funding will be available to boroughs.

We are about to adopt our Affordable Housing and Viability Supplementary Planning Document to ensure we set out clearly what is expected for affordable housing delivery within our borough to all stakeholders. We have also highlighted the need to deliver more affordable homes in the borough in our Local Plan Direction of Travel.

A key issue for Waltham Forest will be the impact of the proposed MCIL2 tariff which has been increased. We consider that this will severely impact on our ability to increase affordable housing contributions, as CIL is a non-negotiable charge.

Part B of the policy is in line with our existing Local Plan. We agree that affordable housing, where possible, should be delivered on site to ensure inclusive communities and consider this a key component of Good Growth.

User:	London Borough of Hillingdon

The Council does not support the Mayor's strategic target to deliver 50% of all new units across London as affordable housing. This target was included in the 2004 version of the London Plan and removed on the basis that it was not being achieved. The Council is unclear how this will be delivered, given the 35 % threshold set out in the Mayor's Affordable Housing and Viability SPD and Policy H6: Threshold Approach to applications.

The strategic target should reflect the 35% threshold contained in policy H6.

User: HFFTRA

H5 Delivering affordable homes

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5.2 We question the SHMA’s departure from usual practice. We note that Bert Provan, Occasional Senior Research Fellow at the Centre for Analysis of Social Exclusion at the LSE and who worked for many years as a Senior Civil Servant in the DWP and DCLG, assessed quite recently (using DCLG data)4 that nationally only one in five households that benefit from help to buy schemes (such as shared ownership) have incomes below the median. He also highlights that for three out of five households it simply helped them to buy sooner – but would inevitably have bought.

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User: London Borough of Hackney

Hackney support the requirement for public sector land delivering 50 per cent affordable housing across its portfolio.

Hackney would appreciate a clearer definition here of ‘public land’:
Would this policy apply on public sector land held by urban development corporations and JVs? (e.g. LLDC Eastwick/Sweetwater sites)

Would this policy apply on land which is held privately on a long lease where the local authority retains the freehold? (e.g. Berkeley/LB Hackney at Woodberry Down)

Would a ‘public land’ application be treated as ‘fresh’ for the purposes of affordable housing provision where they are revising or varying an existing outline permission, or in reserved matters applications?

Hackney would also welcome any detail of how this programme or portfolio requirement would be monitored geographically and over time.
While Hackney’s own estate regeneration and housing supply programme currently models for over 70% affordable housing across the portfolio, we would welcome any clarity on how this aspiration will be met on development across other public sector estates (e.g. TfL) and whether the London Plan will provide for additional affordable housing on sites in boroughs with acute affordability pressures.

User: Swale Borough Council

There are concerns if London does not achieve its overall housing targets; or achieve the affordable targets within those market sites which are delivered, there could be repercussions for districts outside London. If land in Swale is utilised for London affordable housing provision, this could reduce local development opportunities and thus the provision of affordable homes to Swale residents. Swale has problems of homelessness and with pockets of deprivation. With the London policy requirement (H5) to provide 50% of new build as affordable, failure to provide it within London could have potential impacts on public services, including the Housing Options Team. There is currently limited cross boundary partnership working with London authorities and we would be concerned about the impact on already overstretched public services including health, education and social services.

The London Plan must therefore ensure that the required range and mix of private and affordable housing is delivered within London. London Boroughs should be required to deliver affordable homes within a reasonable vicinity of their area to avoid significant migration into Kent and potential for further overloading of stretched public services.

User: Westminster City Council

Emphasis on increased affordable housing delivery supported. However, if the term “strategic target” is going to be used it should be explained what it means – the failure to do so meant that the last attempt to set a target of this kind was widely misunderstood in ways that eventually undermined its credibility and effectiveness.

We agree with taking an ambitious approach to stepping up delivery. However, our experience of dealing with viability issues in detail at a local level suggests the 50% affordable housing target is unlikely to be achieved in high value, high cost areas like ours. Timeliness of delivery is as important as numbers alone and we would be concerned if development delivering much-needed housing was held up while the Mayor seeks unattainable levels of provision.

In particular, delivery of 50% affordable housing on all public sector land will be extremely challenging and may cause public bodies significant difficulties in realising value to support delivery of public services.

Public bodies (including local authorities) do not hold large reserves of funds, and unless borrowing caps are lifted over the plan period, a significant proportion of market housing will be required to subsidise affordable delivery. Achievement of these requirements is also likely to require trade-offs against other objectives in the plan.

There is an urgent need to clarify the relationship between this policy (and particularly criterion A(4) dealing with public sector land) and policy H10 dealing with estate regeneration. Housing estates tend to be “public sector land”, and it is not clear whether it is intended that estate regeneration proposals should be subject to the 50% requirement in this policy or the “replace and maximise” one in H10. There is also a need to define what is meant by “public sector land” – on one site in Westminster the Mayor’s Office for Policing and Crime have argued that a site currently occupied by a police station is not “public land”, and given the variety of different public, private and hybrid agencies that deliver public services this is not as simple a matter as it may appear.

User: Maidstone Borough Council

The SHMA (2017) identifies that in recent years there has been a very low supply of affordable housing in the capital which has contributed to rising numbers of households who are either homeless or ‘concealed’ due to living as part of another household. Homelessness and rough sleeping have all increased sharply in the last five years, though there are recent signs that this growth may be levelling off.

The past under-supply of affordable housing in London, coupled with increasing house prices, places inevitable upwards pressure on housing in the surrounding authorities in the South East. More specifically, some London boroughs appear to be pursuing a policy of relocating housing clients to properties in authorities outside London where rents are cheaper. This can mean that more vulnerable households are separated from their families and support networks and additional pressure is placed on local community services.

The SHMA (2017) concludes that there is a need for approximately 65% of the future annual housing supply to be affordable (47% social rent/affordable rent and 18% intermediate tenures), equating to 43,500 affordable homes/year.

Policy H5 of the draft Plan sets a strategic target for 50% of all new homes to be delivered across London to be affordable. An omission from the Plan is how the 15% shortfall is to be bridged if affordable housing needs are to be met in full in accordance with NPPF paragraph 47. The prospect of under-provision is further compounded by the fact that the Opportunity Areas may have more relaxed housing targets. This needs to be addressed.

User:	London Borough of Southwark

The council supports the Mayor’s strategic affordable housing target for 50% of all new homes to be affordable.

One element of the approach is that 50% can be achieved across a portfolio of sites in some circumstances. For example, public sector land or housing associations can provide 50% affordable housing across a portfolio of sites.

The council is concerned the portfolio approach set out in the plan is insufficiently clear that any portfolio must be considered within a single borough. As currently worded there is a risk the policy could be interpreted to allow a pan-London approach to development portfolios that would allow for lower levels of affordable housing delivered in the higher values areas of a provider’s portfolio and higher levels in the lower value areas. As a higher value part of London this is of particular concern to the council.

User: London Borough of Redbridge

The Council supports the drive to increase the supply of housing and would support the ambition to deliver the target of 50% of all new homes to be affordable, while recognising that this is subject to viability. We also support the provision of a range of different affordable housing products including low-cost rented, the London Living Rent and shared ownership to meet the needs and aspirations of households on low and medium incomes. The Council is keen to explore this issue with the GLA and housing partners to ensure these products respond to needs at a local level.

Redbridge has 5,271 households on the housing register and 4,468 of whom have a level of housing need sufficient to meet the high thresholds in the Housing Allocations policy for an award of priority. The remaining group are households wanting to move into sheltered housing (approximately 160 households) and Redbridge council tenants seeking transfer with no recognised housing need. The highest priority group on the register are homeless households with over 2,500 households registered as homeless home seekers. 1,500 households have been awarded priority because their current home is overcrowded; of which 158 were Redbridge council tenants who have outgrown their existing accommodation. There are currently 2,269 households in temporary accommodation, over 1,000 of whom are placed outside of the borough because the lack of supply in Redbridge. Rehousing times from the housing register are long, with households requiring 3 bedroom accommodation for example waiting on average over 13 years.

Given this level of need we welcome targets to deliver new homes in the borough and any mechanisms to make this easier. However what is clear is that the need for housing in the borough is concentrated in the group that need affordable accommodation and in family sizes. In particular, three bedroom accommodation where levels of need are acute and the ability to secure supply to meet that need is constrained, both in terms of the small supply of affordable homes becoming available and the limited availability of homes of that size available in the private market at or close to local housing allowance rates. The focus in the supply targets on the contribution from small sites give rise to a concern that these will not deliver the scale of affordable housing that is needed or the bed sizes which would most alleviate our acute levels of need for family sized accommodation. Given the scale of affordable need we would welcome any strengthening in the ability to secure higher proportions of affordable homes on private developer schemes than is often possible at the moment.

User:	London Borough of Enfield

Policy H5 looks at ‘Affordable Housing’. The policy to increase the supply of affordable housing is to be supported but viability will continue to remain the biggest challenge between bridging the gap between meeting evidenced need on the SHMA of 65% and supply. It is difficult to see how the Mayor has reconciled this. The policy should be subject to early review in the event that more grant funding is available. There is also no justification for Affordable Housing delivery being measured in habitable rooms rather than units.

User:	London Borough of Wandsworth

Supportive of this policy approach however criteria A4 must recognise that on estate regeneration schemes, given the commitment to replace existing social rented stock there may be viability challenges in achieving a 50% target. It must be recognised that each estate regeneration project will be impacted by the level of leaseholder buy backs and promises to these owners in relation to levels of equity offered. Clarification should be contained in the policy as to the financial appraisal approach taken to assess the levels of affordable housing to be delivered. There is a risk that the Mayor could take an arbitrary approach in intervention on referable schemes which are not defensible if schemes have to be considered again such as seeking S73 changes or such changes relating to the original approval.

User:	London Borough of Richmond Upon Thames

Support the strategic target of 50%. It should be recognised that local needs and evidence will determine borough thresholds, to address priority needs.

The Council does, however, insist that all sites delivering less than 50% affordable housing submit a viability appraisal to support the level of affordable housing being proposed. The Council also seeks onsite provision of affordable housing on all former employment sites.

Support the emphasis in part B on onsite provision to deliver mixed and inclusive communities, and that offsite or cash in lieu must only be provided in exceptional circumstances. Given the borough’s affordable housing needs and limited land opportunities, the guidance in paragraphs 4.5.6 to 4.5.10 is considered helpful.

User:	Royal Borough of Greenwich

We strongly support the introduction of a strategic affordable housing target of 50% (Policy H5) to begin to address the need for more affordable homes in London. However, we are seeking clarity is needed with regards to public land delivering 50% affordable housing and whether this applies to sites that are disposed of as well as those brought forward by local authorities themselves.

User:	London Borough of Harrow

The Council supports the majority of this policy. However, there are two areas of concern. Firstly, whether there remains scope for locally set affordable housing targets, having regard to local evidence such as Strategic Housing Market Assessments and the viability appraisal of the draft Local Plan (as required under the NPPF). Secondly, the Council questions the planning policy basis for treating public sector land (outside the remit of the Mayor of London) differently to private sector land. Such a requirement reduces the ability of local authorities to make the most appropriate use of their land having regard to a range of planning objectives such as cross-funding the provision of new / improved infrastructure (i.e. planning considerations are not just limited to affordable housing).

User:	Royal Borough of Greenwich

Support increase of the strategic affordable housing target to 50% to begin to address the need for more affordable homes in London. However, clarity is needed with regards to public land delivering 50% affordable housing and whether this applies to sites that are disposed of as well as those brought forward by the public sector itself.

User:	London Borough of Havering
The policy should recognise the importance of housing being provided for ‘key workers’ (including teachers)	

User:	Woking BC
Support high affordable housing target set out in Plan.	

User: Mr Joe Ward

There is a widely recognised crisis in the lack of affordable housing provision in London. This needs to be addressed through bold policies in the London Plan which require a higher proportion of genuinely affordable housing in all developments than currently proposed.

Proposed changes: The strategic target for affordable housing in **Policy H5 should be increased from 50 to 60%, with the target in A 4) increased to 60% and the target in A 5) to 70%; Policy H6 B 1) should set the threshold level of affordable housing initially at a minimum of 50%, with 2) and 3) increased to 65%. Policy H7 should require that a minimum of 50% of affordable housing should be for social/genuinely affordable rent, with other proportions adjusted accordingly.**

Rationale: The evidence in the Strategic Housing Market Assessment identifies the level of need for affordable housing as 65% of the total housing requirement. This level of need will not be met with the targets and threshold levels currently contained in the draft Plan. The final Plan needs to establish challenging yet realistic targets in order to inform the development of policies in Borough Local Plans. Unless significant steps are taken towards addressing the affordable housing crisis in London the Mayor's call for a 'City for all Londoners' will be seen simply as an empty slogan.

User:	(FOE) Friends of the Earth England Wales and Northern Ireland

Housing equity is a vital part of the sustainable development of London. We note that the Strategic Housing Market Assessment assesses London's affordable housing requirement over the 10-year period at 65% of the total requirement of 66,000 homes a year. However, this policy sets a target of 50% affordable housing. We consider that the affordable housing target should be increased in order to better reflect the evidence on need.

User:	Waverley
We also welcome the affordable housing thresholds being sought in the Plan to address the high cost of housing which leads to out-migration from London to surrounding areas.	

User: Berkeley Group

5.8. Affordable housing delivery is important to meeting the needs of the many Londoners who cannot afford market homes. Development viability is complex, and changing, and there will be instances where developments are not able to meet the Mayor's thresholds, especially with high rates of CIL and other policy requirements. Whilst the need to increase housing delivery should not be 'relied on as a reason for reducing affordable housing delivery' (4.5.4); the need for affordable housing should not jeopordise the overall delivery of homes, especially given the need to double delivery. A pragmatic approach is required, and delicate balance, between maximising housing delivery and that of affordable housing. Housing development delivers many benefits and it is important that these are not put at risk by unrealistic policies. Greater recognition of this delicate balance is important.

5.9. We would not agree that there has been a 'relaxation in affordable housing and other planning requirements.' In our experience, the level of affordable housing has reduced as boroughs have adopted very high CIL charges and as a result of reduced grant availability. We suggest that paragraph 4.5.4 is redrafted:

The need to deliver 65,000 new homes each year means that applications should be dealt with positively, and the need to deliver more homes and affordable homes should be carefully balanced. Given the extent of housing need identified for affordable housing in the 2017 SHMA, the delivery of overall housing targets should not be relied on as a reason for reducing affordable housing delivery or other policy requirements, subject to the approach in this policy, Policy H6 Threshold approach to applications and Policy DF1 Delivery of the Plan and Planning Obligations. In previous years where there has been a relaxation in affordable housing and other planning requirements this has typically led to higher land values, rather than an increase in housing delivery.(Strikethrough)

5.10. There will be exceptional circumstances where more/better affordable housing can be provided off-site or through a payments in lieu. It is important that this is supported to ensure the best possible affordable housing contribution is made. We support monitoring and reporting of payments in lieu. Where we have made such payments, it is beneficial to be able to tell the community local to our development where new homes have been delivered as a result of our payment.

User: London First

The lack of affordable housebuilding in London is part of the wider failure to meet London's housing target. The Mayor must continue to prioritise delivery of all forms of housing, including affordable housing. There should be greater flexibility in the Plan's policies on affordable housing to ensure that both that total supply of all homes and specifically affordable housing is increased (see H.6 for suggestions).

We welcome the approach to payments in lieu set out in 4.5.10. Boroughs should not be able to take payments from developers and then not use the money. When spending the money, boroughs should only be able spend it on purposes connected to building new homes.

We also believe that that land-use swaps and affordable housing credits may also be constructively used to meet affordable housing policy. The current system delays the delivery of Affordable Housing until a 'need' is generated by the construction of private housing or other affordable housing generating use. An Affordable Housing (AH) Credit system would enable sites that have been identified for affordable housing to be delivered as soon as possible, with the units created subsequently offset against a scheme that generates an AH requirement. We believe this would be a very positive addition for Policy H5 to promote, rather than discourage, such AH Credit schemes as it would help enable the early delivery of affordable housing in London.

User:	London Borough of Enfield - Public Health

More work is required on what is meant by ‘affordable housing’. Definitions of affordable housing relating to market prices within a market that is overheated may still mean that housing is essentially unaffordable to any but the more wealthy.

User: TUC London, South East and East of England

Policy H5: Delivering affordable housing

1. ‘Affordable’ and ‘genuinely affordable’ need to be clearly defined.
2. The experience is that developers have regularly ‘gamed’ the system, either claiming that sites are not economic with certain levels of ‘affordable housing’, or winning planning permission for schemes and then seeking to vary the proportion of ‘affordable housing’. The state needs more, and more robust, outcomes from partnerships with the private sector.
3. The planning system should include incentives to penalise land-banking/incentive rapid and optimal utilisation of land.
4. The capacity of the Mayor of London and London boroughs to increase the supply of homes of all sorts of tenure including at least 50 per cent low-cost would be greatly increased if clauses in the 1961 Lan Compensations Act were amended or repealed. The London Plan should scope the impact of such reforms.

User: National Grid

National Grid Property comments specifically on the economics of provision in delivering affordable housing in its representations on Policy H6 below. On this basis, we have concerns on the strategic targets set out in the new London Plan.

We support the efforts of the GLA to find new and innovative ways to tackle this crisis. But we are concerned that this draft New Plan establishes affordable housing targets which many of our sites simply will not be able to achieve. This judgement is made having considered the viability evidence that National Grid Property has prepared to support many of its applications on complex sites over the last five years. An unrealistic target could delay the approval of housing schemes, thereby only worsening the affordability crisis.

User: Kennington Oval and Vauxhall Forum (KOVF)

12 In our view, liquidating the housing backlog over 25 years (as the SHMA tries weakly to justify at para 6.15) is just kicking the can down the road. Consistently with NPPF para we think a 65% affordable target should be brought in now, not dithered about in 2021, with a 90% low cost rent/10% intermediate split. As an incentive to developers, the viability-study-avoiding “Fast track”, proving so attractive to our developers (to judge from KOV experience), should forthwith be amended to allow, for the next ten years, fast track (without viability study) to developments providing 50% affordable housing, with a 90% low cost rent/10% intermediate split, which if vigorously implemented over 10 years would significantly ease London’s current housing crisis. This approach should be reviewed in the light of results, in time for any refinement of the policy to be brought in after that first 10 years of application. **Policies GG4B and H5 H6 and H7 should be amended accordingly**

(Please see full document for more detail)

User: Just Space

H5 Delivering affordable housing

The key problem underlying the affordability crisis affecting Londoners is the price of land and the Mayor's priority should be to do all he can to slow land price (and that means house price) escalation. In our chapter on Land Reform (draft) for the next Community-led Plan[1] we have proposed the following:

The Mayor should be

a. Lowering land price expectations by

1. Enforcing upper density limits without flexibility
2. Enforcing his 35% affordability threshold without flexibility
3. Specifying the date at which 35% will become 50%
4. Making his definitions of "affordable" housing much more affordable, relating them to local incomes, not local market rents
5. Applying his requirement of no net loss of social housing equally across all renewal schemes over which he has any planning or financial leverage
6. Require that TfL and other Mayoral-family lands that are disposed of for housing development are used substantially for social housing or other social purposes

These proposals are reflected and extended in the following:

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

bedrooms should also be set.

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

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

[1] ***Land Reform*** download from JustSpace.org.uk/history

User: London Borough of Bexley

The proposed strategic affordable housing target set out in **Policy H5 Delivering affordable housing** is undeliverable. Over the past three reporting years, affordable homes have not exceeded 15% of total housing approvals in London and it is unlikely that any of the specific measures in the policy will alter this performance significantly. Insistence on such an unrealistic target will ultimately be counterproductive, dissuading development from coming forward and reducing the supply of housing overall. In addition, it is unclear from the wording in the policy if the 50% is over the life of the Plan, or an annual target.

Part B of **Policy H5** notes that contributions as off-site or as cash-in-lieu are only to be provided in exceptional circumstances. The only reference to this being the preferred approach to affordable housing delivery on small sites is provided as a footnote to **Paragraph 4.5.6**, and this incorrectly references the wrong part of **Policy H2** (**Part F** is referenced instead of **Part H**). It is recommended that the affordable housing contribution that can be made from small sites be directly set out in **Policy H5**.

Bexley's Local Plan policy *aspiration* is to achieve 50% affordable housing as a proportion of all provision *over the plan period as a whole*, with provision delivered on-site and off-site contributions only accepted in exceptional circumstances. However, historically low land values and high build costs combined with the need to provide other essential social infrastructure on sites means that delivering affordable housing is extremely challenging in Bexley.

User:	HTA Design LLP

Finding a mechanism to increase the delivery of affordable housing is essential if we want to build a successful future or London but the latest Annual Monitoring Report published by the GLA confirms that the viability led approach of the past three years has produced affordable housing at an average of just 24% of conventional housing supply. Measures set in place by the GLA to make viability assessment more transparent is a very positive step in gaining the support for development from local communities and it seems likely that once the affordable housing requirements become established the impact will feed through the reduced land values.

User:	Diocese of London

The need for more housing in London and housing that is affordable for all Londoners is one that many including ourselves strongly support. Policy H5 Delivering affordable housing is very important in this respect. We need to reiterate the comments we made on the Housing Strategy last year, which made the case for key worker housing for third sector workers in the communities they serve as neither the affordable housing policy nor the reasoned justification addressed this.

User:	Diocese of London

The need for more housing in London and housing that is affordable for all Londoners is one that many including ourselves strongly support. Policy H5 Delivering affordable housing is very important in this respect. We need to reiterate the comments we made on the Housing Strategy last year, which made the case for key worker housing for third sector workers in the communities they serve as neither the affordable housing policy nor the reasoned justification addressed this.

User:	Association for the Conservation of Energy

Policy H5 Delivering affordable housing

ACE welcomes the vision and principles of Policy H5 to deliver affordable housing for Londoners. As outlined above, ACE would recommend that the Mayor considers a broader definition of affordability within the London Plan, Housing Strategy and GLA programmes: homes should be affordable to rent or buy and live in, and homes should therefore meet the highest energy standards possible in order to reduce energy bills for residents.

User:	Federation of Small Businesses

FSB London would like the plan to clearly state what is classed as affordable housing and rents by stating it in terms of wages x multiplier for ownership i.e. 4 times x average London wage for single occupancy.

User:	London Healthier Places

Affordable, good quality housing is a major influence on health and wellbeing and the LHP Network welcomes the Mayor’s commitment to deliver affordable new homes. The LHP Network believes that a good mix of housing (ie affordability, tenure, size) in any neighbourhood makes for a more balanced community that will benefit everyone living there.

User:	National Housing Federation

Whilst we are concerned that there is a disconnect between the policy intent of the draft London Housing Strategy and draft Plan for 50% of new homes to be affordable, and affordable housing threshold being set at 35%, we recognise the need for pragmatism to get the strategic aim. However, of greater concern to housing associations is the mismatch in expectations between the Mayor's housing team and planning team. Housing associations are agreeing a five-year programme with the housing team for 50% of their delivery to be affordable. Yet the planning team is delaying planning where individual schemes, within that programme, fail to deliver 35% affordable housing. It will be important for the Mayor to bridge this gap – and ensures his housing and planning team are working in unison.

User: London & Continental Railways Ltd

Chapter 4 Housing

Policy H5 – Delivering Affordable Housing

Policy H6 – Threshold Approach to Applications

It is LCR's understanding that the main intention of Policies H5 and H6 is to encourage developers to include high levels of affordable housing from the outset, which will allow policy compliant schemes to fast track in lieu of a viability test that would be required for schemes that do not meet the target thresholds.

As a public sector land owner, LCR is supportive of the Mayor's initiatives to maximise and incentivise affordable housing on public sector-owned land through the fast track method. We feel that to achieve this objective, it would be beneficial to have further clarity on the impact of public sector land on a land pooled development which may include both public and private sector land. Will the 50% affordable housing be applied to just the units on the public sector land or the whole development? If the latter, this may have the opposite effect, with public sector land being omitted from larger developments. Small pockets of public sector land shouldn't have an adverse effect on the overall viability of the site as it is undesirable for regeneration projects to be made up of fragmented schemes and could leave sites that are unviable on a standalone basis. Although the viability test will still be an option for the developments that don't meet the 50% threshold, from a private landowners' perspective omitting public sector land will allow them to go through the 35% fast track route.

Furthermore, we would welcome further clarity on how public sector land in a land pooled site will impact an approach where 50% affordable housing is provided over a portfolio of sites. For example, if a public sector owned sub-station or access strip is included in a larger private development, how will this impact affordable housing provision throughout the rest of the portfolio?

Finally, the plan should provide a more detailed clarification about land that has already been released from the public sector (as reference in paragraph 4.6.5) and how this will be affected by these new thresholds in practice. For instance, will land that has been or will be sold without an initial view to providing housing be subject to the public sector thresholds if housing is proposed at a later date by a private sector developer? Is there intended to be a fixed time limit after which a site is no longer treated as public land? Clarity over this will help to ensure that development is brought forward as soon as possible and opportunities for delivering additional housing development are encouraged.

We believe that clarity on these policies will ensure all stakeholders are aware of the impact of public sector land from the beginning and allowing it to be properly integrated into land pooled developments with the private sector.

User: Zacchaeus 2000 Trust

Policy H5 – Delivering Affordable Housing

Z2K strongly supports the aim of at least half of all new housing built in London being affordable. Such an outcome would outstrip the reality in almost every year since the 1970s, which shows the scale of the challenge, especially when only relatively limited public subsidy is available. While the ambition of meeting the Strategic Housing Market Assessment (SHMA) of 43,000 is a noble one, Z2K does not believe this is possible without over-development, poor design quality and homes that are not actually affordable to those on low incomes. In fact, it will probably cause all three. We therefore believe the target of 25,000 new affordable homes in the draft London Housing Strategy is both more realistic and sensible for the present moment.

User:	Ministry of Housing, Communities & Local Government

The Annex to the Secretary of State's Letter in response to the draft London Plan consultation refers to wanting to understand further the evidence that has underpinned the Mayor's choice of thresholds for affordable housing provision on developments on public and industrial land.
We have heard some concerns that there could be additional costs of development for housing sites on former industrial land, especially where the industrial floorspace is being retained. This could make a 50% affordable housing level difficult to achieve. We would be interested to see any specific assessment you have made on whether this could impact on the viability of development on this type of land.

User:	Surrey County Council

We also welcome the affordable housing thresholds being sought in the Plan to address the high cost of housing which contributes to out-migration from London to surrounding areas.

User:	SEGRO

It is important to the effective function of our customers that their employees have access to good quality housing within the Capital. We therefore support policies which promote the delivery of new and affordable housing, as well as the delivery a mix of housing products (including build to rent) which broaden housing choice and increase the pace of delivery.

User: London NHS Clinical Commissioning Group

Policy H5 Delivering affordable housing and Policy H6 Threshold approach to applications

Policy H5 sets a strategic target of 50% of all new homes delivered across London to be affordable. Under part A 4 of the policy public sector land is expected to deliver at least 50 per cent affordable housing across its portfolio. Under Policy H6, the Mayor will adopt a threshold approach to applications which are capable of delivering more than ten units or which have a combined floor space greater than 1,000 sqm. The threshold approach is used to introduce a 'Fast Track Route' whereby a viability assessment at the planning application stage is not required. The threshold for public sector land is currently proposed at 50% whilst the threshold for most private sector land is 35%.

We recognise the importance of increasing the delivery of affordable housing to meet London's significant housing needs and to address overcrowding in the existing housing stock and numbers of people living in temporary housing. Excessive housing costs or living in a home that is damp, too hot or too cold can have serious health impacts.

We recognise the contribution that surplus NHS land can make to increased housing provision in London. The Naylor Review of NHS property and estates identified potential capacity for 10,000 new homes on existing sites in London. We note that, in paragraph 4.6.5 that the Mayor is willing to enter into an agreement with public sector landowners to deliver at least 50% affordable housing across a portfolio of sites, with a 35% threshold applied to individual sites.

It should be recognised that the NHS estate is owned by different NHS organisations and the value of land and buildings and development potential varies considerably across London. There is a risk that individual boroughs will seek the 50% affordable housing on each NHS site and their area and as a result each site would be subject to a viability appraisal, which in turn would slow down the release of sites and provision of new infrastructure.

Regrettably, insisting on a higher level of affordable housing will impact on the value of capital receipts needed to re-invest in modern NHS estate which is required to transform and sustain healthcare services. As opportunities are often unique to individual sites and local circumstances we suggest that the policies should be applied flexibly and on larger sites, and the NHS, the GLA and local planning authorities should work closely together to maximise the opportunities.

Therefore, setting a 50% threshold does not take into account the scale of investment required to provide a modern health care system with

the facilities required to meet the increasingly complex health conditions and an aging population. We consider that a 35% threshold, consistent with the private sector, would be more appropriate, reflecting the reality that the development will enable reinvestment in the health estate. The viability evidence supporting the local plan conflates industrial land and public sector land as low value uses. This in many cases is wrong, with the health estate including offices and higher value sites. It would also create the situation whereby the redevelopment of a private health care facility would only require 35% as a threshold figure but the NHS would require 50%. With a revised figure of 35% the portfolio approach would be welcomed to allow the best use of land meeting other London Plan objectives. This should remove any threshold for individual sites providing more than 10 units which would require a detailed viability assessment to be produced for individual sites running counter to the proposed strategic portfolio proposal.

For the reasons outlined above reference to 50% affordable housing on public sector land should be removed from Policies H5 and H6.

We welcome the acknowledgement in paragraph 4.6.5 that public sector land also represents an opportunity to deliver homes that can meet the needs of London's essential workers, including NHS workers. This is repeated in paragraph 1.5.6 in the context of London's resilience where a shortage of affordable housing is hindering the recruitment and retention of public service workers, including health.

The Mayor's draft Housing Strategy, at paragraph 3.42, states that the Mayor will support approaches that set aside a proportion of homes on public land for key workers, such as health and education professionals, but states that this should be in addition to these sites providing 'genuinely affordable homes'. In the context of key NHS sites, we suggest that housing for NHS and other public sector workers could be provided, but should be included within an overall proportion of affordable housing. Further work is needed to identify where these homes would fit within the proposed different affordable housing products or if they would form a variant which may need to be recognised within the Plan. We note the announcement in the Autumn Budget 2017 of a 'Homes for Nurses' scheme which would give NHS workers first refusal on affordable housing generated through the sale of surplus NHS land.

The need for affordable housing as identified in the SHMA is primarily for affordable rent (including social rent) and given this will be at a higher cost (and less viable) than intermediate housing. We consider that the policy should allow for flexibility within the Fast Track Route or where the scheme is providing social infrastructure identified in borough's infrastructure plan.

User: London Federation of Housing Cooperatives

H5 Delivering affordable homes

5.2 We are concerned that the SHMA identifies households that can afford market rents, but who want to eventually buy a home, as having a need for intermediate housing. This is a departure from the way that SHMAs have been carried out in the past. It significantly contrasts with situations in which households that can only genuinely afford social-rented homes, yet are housed in private-rented homes that they will never be able to afford without the support of housing benefit, but are not deemed to need social rented homes. This treats lower income households with inequality. It results in a higher target for intermediate housing than would previously have been assessed. We note, in addition, that the backlog of need for intermediate housing has fallen considerably since the 2013 SHMA was carried out - from 45,705 to just 4,056. The backlog of need for social rented housing however is now 40 times that of intermediate housing,having more than doubled since 2013.

We question the SHMA's departure from usual practice. We note that Bert Provan, Occasional Senior Research Fellow at the Centre for Analysis of Social Exclusion at the LSE and who worked for many years as a Senior Civil Servant in the DWP and DCLG, assessed quite recently (using DCLG data)2 that nationally only one in five households that benefit from help to buy schemes (such as shared ownership) have incomes below the median. He also highlights that for three out of five households it simply helped them to buy sooner – but would inevitably have bought.

The big question in terms of Policy H5 is 'affordable to who? So-called 'affordable' housing covers housing that a wide range of households with incomes can access from less than £12,000 a year (we note that the average social housing income is on average £17,500 a year) to households earning £90,000 and who are in the top 15% of households in London. 'Affordable' housing is thus a subjective term. Sub-market housing is a more accurate description for such a wide variety of tenures.

Most types of 'affordable housing' do not meet the needs of households with below median income levels. Policy H5 fails to address this. It sets a target for only 15% of homes delivered to be social rented and leaves boroughs to determine whether there may be any additional. The likelihood is that in attempts to deliver 50% affordable housing, boroughs will choose to deliver intermediate housing as more can be delivered for the same cost.

The Mayor should set a strategic London-wide target as has occurred in previous London Plans, in order that London-wide need might be

delivered.

We propose:

? The title of policy H5 be renamed, more accurately, ‘sub-market housing’.

? The policy should refer by name to the different types of sub-market housing.

? Targets should be set that address the need identified in the SHMA but reverting to the previous way of assessing need for intermediate housing (that is for households not able to meet the cost of market homes – including private renting).

? This should be 65% sub-market housing, comprising 50% social / low cost rented homes and 15% intermediate. It should be noted that 30,973 social / low-cost rented homes need to be delivered annually over the next 25 years in order to deal with existing and backlog of need. Delivery of less than will continue to increase the backlog of need and increase the number of years that it will take to address the backlog. It should say that if the backlog of need were to be addressed over a 10-year period the social housing target would need to be 62% (of all homes) or higher.

? The Mayor should renegotiate with the Government around the use of all affordable housing grant to enable it in total to be used to deliver social-rented homes.

? The Mayor should require that all section 106 to be used to deliver socialhousing.

? Intermediate housing should be delivered without affordable housing grant.

User: CPRE London

Affordable housing

There is a widely recognised crisis in the lack of affordable housing provision in London. This needs to be addressed through bold policies in the London Plan which require a higher proportion of genuinely affordable housing in all developments than currently proposed.

Proposed changes: The strategic target for affordable housing in **Policy H5 should be increased from 50 to 60%, with the target in A 4) increased to 60% and the target in A 5) to 70%; Policy H6 B 1) should set the threshold level of affordable housing initially at a minimum of 50%, with 2) and 3) increased to 65%. Policy H7 should require that a minimum of 50% of affordable housing should be for social/genuinely affordable rent, with other proportions adjusted accordingly.**

Rationale: The evidence in the Strategic Housing Market Assessment identifies the level of need for affordable housing as 65% of the total housing requirement. This level of need will not be met with the targets and threshold levels currently contained in the draft Plan. The final Plan needs to establish challenging yet realistic targets in order to inform the development of policies in Borough Local Plans. Unless significant steps are taken towards addressing the affordable housing crisis in London the Mayor's call for a 'City for all Londoners' will be seen simply as an empty slogan.

Density, design and local character

User: Chartered Institute of Architectural Technologists

Policy H5

As mentioned previously, the delivery of quality affordable housing is one of the main performance indicators that this plan will be measured against and it is pleasing to note that a strategic target of 50 percent has been set for all new homes constructed. The safeguards which have been put in place within the detailed policy sections of the plan must be monitored and enforced to ensure the success of this policy.

User: U+I

At U+I, we recognise that a big part of solving the challenges London faces is for the city to build more. The responsibility for this exists at all levels – small builders, public sector organisations and large-scale developers – and must be done so in a way that meets London's diverse needs: office space, creative venues, affordable housing, intermediate accommodation and retail offers.

We also know that this is easier said than done. However, we believe there are real opportunities to tackle these challenges. One example of this is ensuring all publicly owned land is put to good use. In addition to the positive steps the Mayor has already taken, we would encourage a system that rewards innovative proposals for schemes that deliver better-than-current use of publicly owned land that meet the needs of local communities – the ultimate owners of this land.

In the light of the suggested 50% target for public land, institutional arrangements which allow for varied percentages of affordable housing across different parts of London will clearly help in achieving viability for more difficult sites without undermining the overall 50% target imperative. For GLA family sites, this means recognition that financial income from site disposals might well become more limited.

User:	U+I

We welcome the emphasis on genuine affordability, not just for those who qualify for social rent but also for the ‘squeezed middle’, who do not qualify for social housing. U+I shares the Mayor’s aim to deliver for this part of the market and would be delighted to work with him to explore ways in which we can deliver for this demographic.

User:	Notting Hill Housing Trust
NHHT supports the Mayor’s strategic target to deliver 50% affordable homes across London.	

User: Roca Investments

Discretionary Social Housing Relief

The Mayor is asked to consider the use of Discretionary Social Housing Relief (DSHR) to encourage more innovative affordable housing models to come forward and help deliver more housing. . At present due to the wording of the CIL Regulations only social and affordable rented housing, intermediate rented housing and shared ownership housing benefit from mandatory SHR. There are very few examples where a Borough has enacted DSHR. This adds significant cost to developers wanting to deliver other forms of genuinely affordable homes for young people, single households and older household requirements. Smaller households are often better suited to be delivered as part of mixed use sites (particular smaller sites).

We would welcome the Mayor leading by example and enact DSHR on Mayoral CIL. This would encourage and incentivise boroughs to do the same. This would potentially deliver more housing and jobs and contribute to infrastructure via CIL.

User: Zbig Blonski

Policies H5 & H6 – Delivering affordable housing/threshold approach

32.Experience over the last 10 years and the policy of the current London Plan clearly demonstrates that over ambitious approaches seeking to achieve over ambitious levels of affordable housing are bound to fall far short within the current system. Though the approach in the London Plan seeks to address this in a way by seeking 35% threshold level. However, it is considered that this will still fail as it will not change land and hope values. This in turn will be reflected in viability appraisals, which will conclude that the inclusion of these levels of affordable housing is not viable. The incentivisation of providing 35% affordable housing to avoid the need for a viability assessment is flawed. In any case viability assessments where a minimum of 35% affordable housing is being provided might well be required for other purposes so this is not really a realistic incentive.

33.Therefore it is considered that a more effective approach would be to set the required amount of affordable housing at a lower level – 25% but to make this a mandatory requirement. Simply development would not be approved unless it included at least 25%. No extenuating construction or other costs would be accepted to allow for exceptions. This would directly effect land values and result in schemes being viable. Overall this should lead to higher levels of affordable housing being actually delivered.

34.There is no justification for the two tier approach requiring the inclusion of 50% on publicly owned land. Public bodies require to raise value from their land assets to finance their activities and services which are for public good and sources of funding have been heavily cut over the last 5 years and more. There is no reason why they should be penalised in the way proposed. In addition developments on publicly owned land often include community and public benefits that are not part of private developments so the costs can be higher. Due to the lower profitability it could well result in lower quality development whereas affordable housing should be of high quality and not distinguishable from private sector housing. Therefore the minimum threshold for publicly owned sites should be the same as for privately owned. If there are opportunities to increase this the public bodies are quite capable of realising such opportunities where it is appropriate.

35.The way it is proposed to measure the proportion of affordable housing is unnecessarily complicated. There should be a single measure. This should be homes and not rooms because that is what is needed to provide accommodation.

User: British Property Federation

We would like to see some emphasis and recognition in policy H5 of the frequently competing needs of planning-related commitments that developers face having to make – not only in s106 obligations but via mayoral and borough community infrastructure levy (CIL). The decision as to whether a proposed development will qualify for the threshold approach route on application will sometimes not be one that the developer is able to make, if there are likely to be significant other planning obligations and CIL payments to be made. Greater emphasis could also be made in the policy on how developers and local authorities should prioritise in order the Plan's policy obligations after CIL and explain the other options that can be considered for enhancing scheme viability e.g. via the funding of necessary infrastructure (e.g. via public funding, tax increment finance, etc.), so as to ensure the optimal type and amount of affordable housing can be delivered.

We also believe that land use swaps and affordable housing credits (AHCs) should be constructively used to help meet affordable housing policy requirements. The current system delays the delivery of affordable housing until "need" can be met by an affordable housing-generating development. An AHC system would enable sites that have been identified for affordable housing to be delivered as soon as possible.

This has been done, an example of which being the Wilton Plaza, Westminster which delivered 74 affordable units, 68 of which were granted the status of an AHC and were completed in May 2009. 25 units were allocated to the Wellington House development that completed in October 2012, and the remaining 43 were allocated in 2014 to Arundel Great Court (a scheme that is still yet to be fully constructed). Compared to the normal process for delivering affordable housing, the AHC mechanism enabled 25 units to be delivered 3.5 years early and arguably the remaining 43 would still not have been delivered.[1]

There have been other instances where developers have found a site capable of delivering off-site affordable housing but been unable to do so because they are not yet able to deliver that scheme that generates the requirement. However, with AHC, developers could proceed with its delivery knowing that costs could be offset the costs against: the generating scheme if it is undertaken; another scheme in the portfolio; or

via a third party that has also generated the need for affordable housing.

[1] Landsec

User: Mrs Annette Gossett

I tried to register to make a comment via the website, but I never got any email back, so I am emailing you directly. I am fundamentally opposed to the definition of ‘affordable housing’ that the plan is hinged on. It is blatantly ridiculous to base it on the market rates, since the market has no checks and balances at all, nothing to keep the rents within the grasp of ordinary people. Their rents are based on what they can get away with and maximising their profits. They have no relationship to people's earnings and do not try to keep communities and families together. But that should be a fundamental aim of any London Plan.

Rents should be linked to people’s salary, typically the minimum wage, since that is what most people will be safely assumed to have. If you want to up the ante, link to the London living wage, but not market rents, which are destroying people’s lives, stability and enjoyment of life. You should know better, let’s not take our measurements of how to treat people’s very homes from the community-blind commercial sector,

User: Claire Mellish

H5 Delivering affordable housing

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

The Mayor should be

a. Lowering land price expectations by

1. Enforcing upper density limits without flexibility
2. Enforcing his 35% affordability threshold without flexibility
3. Specifying the date at which 35% will become 50%
4. Making his definitions of "affordable" housing much more affordable, relating them to local incomes, not local market rents
5. Applying his requirement of no net loss of social housing equally across all renewal schemes over which he has any planning or financial leverage
6. Require that TfL and other Mayoral-family lands that are disposed of for housing development are used substantially for social housing or other social purposes

These proposals are reflected in the following:

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

‘affordable’ housing target. A target that at least 30% of new homes should have 3 or more bedrooms should also be set.

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

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

User:	Town and Country Planning Association

The TCPA welcomes the approach taken to improve housing delivery. The TCPA is undertaking research, supported by the Nationwide Foundation, to provide an understanding of why the planning system is currently unable to secure ‘genuinely affordable homes’ in many parts of England, including in some London boroughs. This research, although not ready during the consultation period on the London Plan will be shared with the GLA planning team as it is completed later in 2018.[1]

[1] TCPA Planning for affordable housing project https://www.tcpa.org.uk/planning-for-affordable-housing

User: Town and Country Planning Association

Policy H5 Delivering affordable housing

3.5.4 The draft London Plan shows a welcome level of ambition in the percentage of affordable homes required in new development. The TCPA agrees with the aim to deliver affordable housing onsite to ensure that mixed communities are secured, and that the wider objectives of a healthy city can be met by access to genuinely affordable, high-quality homes. Policy H5 sets out a requirement for around 43,500 affordable homes per year across London, and recognises that delivering this will need increases from all sources.

User: London Housing Directors

Housing Directors are supportive of the ambitious strategic target for 50 per cent of new housing delivered across London to be affordable. There is also is broad support for the threshold approach to providing affordable housing (set out in the recent affordable housing and viability SPG) as the key delivery mechanism for affordable housing. However, The SHMA identifies that to meet housing need in London, 65 per cent of the housing delivered in London needs to be in affordable tenures and that 47 per cent of housing should be low cost rented. There is currently a disconnect between the types of affordable housing that are required and the tenures of the affordable units that are being delivered. The GLA and boroughs need to jointly consider how a greater amount of social and low cost rented units can be delivered.

While a strong strategic policy in regards to supporting affordable housing provision is important, Directors believe there could be scope to better maximise the provision of affordable housing across public sector land. The requirement to deliver 50 per cent affordable housing on individual sites may be restrictive and hinder development sites within the public sector pipeline. A portfolio approach to delivery, which would focus on delivering the 50 per cent affordable housing contribution is delivered across a range of sites, could be preferable. The policy can be clarified to make clear whether a 50 per cent affordable housing threshold would apply where sites are transferred and developed by borough-owned housing companies and on joint venture sites.

The policy needs to clarify whether a 50 per cent target for affordable housing would apply to estate regeneration schemes, or whether estate regeneration would follow the less demanding targets set out in policy H10 (which states that where the loss of existing affordable housing is proposed this should generally involve uplift in affordable housing provision referring to demolition and replacement). The policy further indicates that the delivery of additional affordable housing should be maximised.

When considering individual estate regeneration schemes or larger regeneration programmes on public land, it may not be possible in each case to deliver 50 per cent affordable housing. What can be achieved will depend on the tenure of existing homes on the site, and whether they need to be replaced or refurbished. The GLA should clarify this position in the published plan and link the Plan to guidance in the Good Practice Guide to estate regeneration document, currently out for consultation.

User:	Community Led Housing London

Community land trusts (CLTs) are a form of community-led housing. Their core purpose is the delivery of housing that is genuinely and permanently affordable. CLTs use a range of innovative methods to achieve affordability. For example the London CLT has developed a model of linking house prices to local median incomes, and imposing a resale price covenant. Housing Co-operatives also provide a way of residents owning and managing their own affordable housing. Given the Mayor's support for community led housing, *Policy H5 Delivering affordable housing* should make specific reference to CLTs and co-ops as recognised sources of affordable housing:

Policy H5 part A 6) working with Community Land Trusts1 and Housing Co-operatives2 to deliver genuinely affordable housing in perpetuity.

User: Miss Clare Joseph

Whilst we welcome a plan for housing in London, **we have concerns around the jargon used in the London Plan and we don't think it goes far enough to ensure that we build enough genuinely affordable homes**, preferably not for profit council homes.

We acknowledge that the term 'affordable' is a Government coined legal term, but **as Labour Mayor you should lead the way in rejecting Tory rhetoric, which stops us looking at the reality of high cost living in a low wage economy.** What is affordable is subjective. We think you appreciate that 80% of market rate, defined by the Government as affordable, is quite clearly UNaffordable for many in need of a home, particularly in Hackney, where the average wage is 33k.

We object to the inclusion of shared ownership within your 'affordable' framework. Many shared ownership residents we have spoken to say they are spending up to 50% of their income on rent, mortgage and service charges for their homes. Service charges are concerning in themselves, with developer appointed managing agents typically charging £3k a year for a one bedroom flat in Hackney. These service charges include large management fees and do not seem to prioritise value for money for tenants. We have also noted that shared ownership tenants in Hackney rarely increase their stake in their homes.

Moreover the entire shared ownership model is stacked in favour of the developer at the expense of would-be buyers, making them poor value which should not be touted as affordable. Please consider the following:

1. Shared ownership introduces new buyers to the market who would otherwise be unable to get a mortgage, thus creating demand. Developers are then able to take advantage of this new market through the receipt of a guaranteed purchase price for shared ownership homes.

2. The flats are not sold in the usual way as they are not exposed to market forces (you cannot submit an offer) – the price is determined by a valuation – thus the developer is guaranteed the valuation price and the buyer is obliged to pay the valuation price.

3. These valuations are often inflated, or optimistic, particularly when you consider that they are new builds and in any slump will likely be the first to lose value on the open market.

4. The case of Richardson v. Midland Heart is an example of a landlord bringing proceedings in court to obtain a possession order using

the same procedure that is used against assured tenants under Housing Act 1988. If this happens the landlord is not obligated to pay the shared owner any compensation for the loss of his or her share in the equity of the property. This is another reason we think shared ownership is of dubious value and should not be touted as affordable.

It is heartening to see that within your draft plan some homes will be provided at a reduced (from market rent) rate. This has been referred to as a **'Living Rent' within your 'Genuinely Affordable' campaign**, where you state that the average cost of a two bedroom flat is around £1,000 a month, as opposed to around £1,800 on the private market in Hackney.

We applaud this as a step in the right direction, **but would urge you to avoid referring to this as a 'living rent'.** It is still incredibly expensive for many people, and most importantly, **it sounds like the Living Wage, something we in Hackney campaign for.**

Please take into account that if a Living Wage in London is £10.20 an hour (approx. £1,401.00 a month based on a 37.5 hour week with tax deductions) then it cannot follow that a Living Rent is £1,000. This would leave only £401.00 a month for food, bills, travel, clothes, phone, internet and any form of entertainment.

There is nothing affordable about spending two thirds of your income on rent and it is certainly not living, or not in a civilised way. Shelter suggests that to be affordable, an individual's rent should take up a maximum of 35% of their income, and clearly the poorer you are and the more dependants you have, the smaller the percentage you can afford give up without suffering.

The terms 'living' and 'affordable', whether utilised by you or by the Tories, inevitably become tainted because they are very subjective. Arguably names have to be coined to distinguish between the various schemes, but isn't it better just to say what things cost? **To describe them as 'living' or 'affordable' will alienate the (many) people who still simply cannot afford them,** particularly if a 'Living' rent does not align with a 'Living' wage**. Please take the lead and simply state the price of homes, allowing Londoners to judge affordability for themselves.** The Labour Party doesn't have to participate in Tory Newspeak.

We welcome your call on the Government to free up Councils to build more and for removal of the Housing Revenue Account borrowing caps. The type of housing that the majority would benefit from is not-for-profit, properly regulated, council housing and you should be clear about that in the face of Tory and media 'sink estate/benefit scrounger' rhetoric. However, unless planning law which favours big developers is reversed, it will remain difficult for Councils to achieve the ideal of many well maintained council homes. The law was changed in 2012 to say that developers must make 'competitive returns' (in practice, a profit of at least 20 %). This has been used to justify developers failing to provide the requested number of 'affordable' homes, and it is likely that this practice will continue, particularly if you do not ban cash in lieu contributions. **It is not enough for your Plan simply to state:**

> **“** ***Cash in lieu contributions should be used in even more limited circumstances[45], and only where there is detailed evidence to demonstrate that on-site affordable housing delivery is not practical, off-site options have been explored but are not acceptable and that accepting a cash in lieu contribution will not be detrimental to the delivery of mixed and inclusive communities.*** **”**

If we are serious about building homes the majority can afford to live in, then we must completely end the practice of accepting cash in lieu of 'affordable' housing. Cash in lieu is unhelpful, as local authorities then have to identify yet another site on which to build housing. As your plan asserts, we lack space in London and we currently have a situation where working class and even middle class people are being pushed out, as developers insist that they cannot house the poor in central London, so they are driven further and further out of the city.

The London Plan calls for empty space to be used for housing, but if it is merely more housing that the majority cannot afford then it will be a scandalous land-grab that infringes on current residents' recreational space with few benefits except profit for developers and sub-contractors. We urge you to go further and set the 'affordable' percentage at a minimum of 65% in new developments, which is what you yourself declare the London Strategic Housing Market Assessment says we need. Instead you have called for a woeful 35% on private land (subject to review in 2021) and 50% on public land.

The sentiment in the plan appears to support more genuinely affordable housing, but it is not supported by radical policy change. We cautiously welcome fast-tracking as an incentive for developers whose plans meet the minimum levels of affordable housing, however we despair at the continued use of 'viability' assessments as an option to justify building less or no cheaper housing. **Please remove statements such as 4.5.3 (set out below) which will allow developers to continue to renege on their obligations:**

> **“** ***Only where there are clear barriers to delivery and it is fully justified through detailed viability evidence, in line with the methodology and assumptions set out in Policy H6 Threshold approach to applications and the Mayor’s Affordable Housing and Viability SPG, should a lower level of affordable housing be considered.***

”

Whilst you cannot change the law, the removal of this clause would send a far clearer message to developers and help ensure that Londoners get some value from developments. If developers cannot afford to include a decent proportion of the housing Londoners actually need, then they must not build and we must not make it easy for them to do so.

It would be useful to include a clause giving local authorities the right to see the accounts of developments which have been deemed, through viability assessments, to be unable to provide the requested affordable housing. If units end up being sold at a higher value than predicted in the viability report and creating more profit than forecast for the developer, then the local authority should be entitled to additional affordable housing on site.

Finally, all of this hard work to build homes is undermined if we do not repeal the right to buy scheme, as we will continue to lose much needed council stock. **Council housing has not been built en masse for forty years or more and since 1980 we in Hackney have lost a quarter of our council housing, whilst 13,000 people languish on the council housing waiting list.** Scotland and Wales have recently announced plans to stop right to buy and we urge you to come out in support of the same. Reforms will not solve the situation; the most frequently proposed reform is decreasing the discount available, making it less likely that a poor person could afford to buy under the scheme. **Right to buy must end as a matter of Labour principle and for the collective good, so please take the opportunity presented by the publication of your London Plan and make a public stand on this issue.**

User:	Catalyst Housing Limited

AFFORDABLE HOUSING

Draft Policy H5 relates to delivering affordable housing. It sets out a range of measures to achieve the Mayor's 50% strategic target, including affordable housing providers with agreements with the Mayor delivering at least 50% affordable housing across their portfolio.

User: Benhill Residents

We are concerned that the Mayor set policy first, in election promises (of 50% ‘affordable housing’) rather than using evidence to inform policy and to then negotiate with Government around the funding required to address London’s housing need.

We are concerned that the SHMA identifies households that can afford market rents, but who want to eventually buy a home, as having a need for intermediate housing. This is a departure from the way that SHMAs have been carried out in the past. It significantly contrasts with situations in which households that can only genuinely afford social-rented homes, yet are housed in privaterented homes that they will never be able to afford without the support of housing benefit, but are not deemed to need social rented homes. This treats lower income households with inequality. It results in a higher target for intermediate housing than would previously have been assessed. We note, in addition, that the backlog of need for intermediate housing has fallen considerably since the 2013 SHMA was carried out - from 45,705 to just 4,056. The backlog of need for social rented housing however is now 40 times that of intermediate housing, having more than doubled since 2013.

We question the SHMA’s departure from usual practice. We note that Bert Provan, Occasional Senior Research

Fellow at the Centre for Analysis of Social Exclusion at the LSE and who worked for many years as a Senior Civil Servant in the DWP and DCLG, assessed quite recently (using DCLG data)4 that nationally only one in five households that benefit from help to buy schemes (such as shared ownership) have incomes below the median. He also highlights that for three out of five households it simply helped them to buy sooner – but would inevitably have bought.

The big question in terms of Policy H5 is ‘affordable to who? So-called ‘affordable’ housing covers housing that a wide range of households with incomes can access from less than £12,000 a year (we note that the average social housing income is on average £17,500 a year) to households earning £90,000 and who are in the top 15% of households in London. ‘Affordable’ housing is thus a subjective term. Sub-market housing is a more accurate description for such a wide variety of tenures.

Most types of ‘affordable housing’ do not meet the needs of households with below median income levels. Policy H5 fails to address this. It sets a target for only 15% of homes delivered to be social rented and leaves boroughs to determine whether there may be any additional. The likelihood is that in attempts to deliver 50% affordable housing, boroughs will choose to deliver intermediate housing as more can be delivered for the same cost.

The Mayor should set a strategic London-wide target as has occurred in previous London Plans, in order that London-wide need might be delivered.

We propose:
• The title of policy H5 be renamed, more accurately, ‘sub-market housing’.
• The policy should refer by name to the different types of sub-market housing.
• Targets should be set that address the need identified in the SHMA but reverting to the previous way of assessing need for intermediate housing (that is for households not able to meet the cost of market homes – including private renting).
• This should be 65% sub-market housing, comprising 50% social / low cost rented homes and 15% intermediate. It should be noted that 30,973 social / low-cost rented homes need to be delivered annually over the next 25 years in order to deal with existing and backlog of need. Delivery of less than will continue to increase the backlog of need and increase the number of years that it will take to address the backlog. It should say that if the backlog of need were to be addressed over a 10-year period the social housing target would need to be 62% (of all homes) or higher.

• The Mayor should renegotiate with the Government around the use of all affordable housing grant to enable it in total to be used to deliver social-rented homes.
• The Mayor should require that all section 106 to be

used to deliver social-housing.
• Intermediate housing should be delivered without affordable housing grant.

User: The Crown Estate

We particularly agree with the Alliance's comments in respect of land use and affordable housing credits and the suggestion that the Mayor should encourage the use of these, especially within CAZ sites. This should be strengthened addressed within policies SD5 and H5.

Off-site provision, land use swaps and the use of credits can all be invaluable tools to satisfy planning policy, especially in central London, contributing to the mix of uses that makes London so distinctive. Allowing off-site provision of housing, land use swaps and the use of credits as part of a portfolio-based approach can often enable better overall outcomes.

We see affordable housing credits as being important to help sustain important commercial clusters, whilst delivering a greater quantity and better quality of affordable housing in London. As we have multiple holdings across London and take a holistic approach to our developments, we may in the future have opportunities to deliver more affordable housing on sites than required by policy. Conversely, there may be some sites where it is impractical to provide the full policy target level of affordable housing on-site. In these cases, enabling the use of affordable housing credits potentially enable us to provide more affordable housing, earlier, than we would otherwise be able to should on-site provision be required. This ensures that overall affordable housing patterns are maximised.

User: Elaine Chambers

H5 Delivering affordable homes

5.1 We are concerned that the Mayor set policy first, in election promises (of 50% 'affordable housing') rather than using evidence to inform policy and to then negotiate with Government around the funding required to address London's housing need.

5.2 We are concerned that the SHMA identifies households that can afford market rents, but who want to eventually buy a home, as having a need for intermediate housing. This is a departure from the way that SHMAs have been carried out in the past. It significantly contrasts with situations in which households that can only genuinely afford social-rented homes, yet are housed in private-rented homes that they will never be able to afford without the support of housing benefit, but are not deemed to need social rented homes. This treats lower income households with inequality. It results in a higher target for intermediate housing than would previously have been assessed. We note, in addition, that the backlog of need for intermediate housing has fallen considerably since the 2013 SHMA was carried out - from 45,705 to just 4,056. The backlog of need for social rented housing however is now 40 times that of intermediate housing, having more than doubled since 2013.

5.2 We question the SHMA's departure from usual practice. We note that Bert Provan, Occasional Senior Research Fellow at the Centre for Analysis of Social Exclusion at the LSE and who worked for many years as a Senior Civil Servant in the DWP and DCLG, assessed quite recently (using DCLG data) that nationally only one in five households that benefit from help to buy schemes (such as shared ownership) have incomes below the median. He also highlights that for three out of five households it simply helped them to buy sooner – but would inevitably have bought.

5.3 The big question in terms of Policy H5 is 'affordable to who? So-called 'affordable' housing covers housing that a wide range of households with incomes can access from less than £12,000 a year (we note that the average social housing income is on average £17,500 a year) to households earning £90,000 and who are in the top 15% of households in London. 'Affordable' housing is thus a subjective term. Sub-market housing is a more accurate description for such a wide variety of tenures.

5.4 Most types of 'affordable housing' do not meet the needs of households with below median income levels. Policy H5 fails to address this. It sets a target for only 15% of homes delivered to be social rented and leaves boroughs to determine whether there may be any additional. The likelihood is that in attempts to deliver 50% affordable housing, boroughs will choose to deliver intermediate housing as more

can be delivered for the same cost.

5.5 The Mayor should set a strategic London-wide target as has occurred in previous London Plans, in order that London-wide need might be delivered.

5.6 We propose:

· The title of policy H5 be renamed, more accurately, ‘sub-market housing’.

· The policy should refer by name to the different types of sub-market housing.

· Targets should be set that address the need identified in the SHMA but reverting to the previous way of assessing need for intermediate housing (that is for households not able to meet the cost of market homes – including private renting).

· This should be 65% sub-market housing, comprising 50% social / low cost rented homes and 15% intermediate. It should be noted that 30,973 social / low-cost rented homes need to be delivered annually over the next 25 years in order to deal with existing and backlog of need. Delivery of less than will continue to increase the backlog of need and increase the number of years that it will take to address the backlog. It should say that if the backlog of need were to be addressed over a 10-year period the social housing target would need to be 62% (of all homes) or higher.

· The Mayor should renegotiate with the Government around the use of all affordable housing grant to enable it in total to be used to deliver social-rented homes.

· The Mayor should require that all section 106 to be used to deliver social-housing.

· Intermediate housing should be delivered without affordable housing grant.

User: Royal London

Policy H5 – Delivering affordable housing

The provision and objective to deliver affordable homes is supported. The provision of affordable housing that a scheme can support or provide is based on a number of factors including site specific constraints and intrinsically the overall financial viability of the scheme. Commercial viability of schemes is wide ranging across London depending on location and the scale of development permissible. From our experience, we would suggest that a 50% strategic target is unrealistic and would result in the majority of developments (if applied to each case) being unviable

The threshold policy (H6) within the Draft London Plan is noted and understood however we would recommend that the strategic target is set to a more realistic level and as a minimum a specific acknowledgment in the wording of the policy of the key role viability will have in determining the affordable housing provision that a scheme can support.

In relation to the supporting text of the policy paragraph 4.5.3 is concerning stating that 'schemes are expected to deliver at least the threshold level of affordable housing without grant of public subsidy...' . This presumption is at odds without the recognition that the affordable housing provision is subject to site specific considerations and viability setting either a 35% or 50% provision as the norm and expectation where a lower provision will in most cases be fully justified.

User:	Fairview New Homes

Fairview support the Mayor’s aspirations for providing the maximum viable affordable housing on larger schemes to address the current housing crisis. As a matter of record, the majority of our schemes, in London over the last 2 years have delivered 35% Affordable Housing by habitable room. The ambitious target of 50% is important, but it is equally important that developers are not discouraged from investing in land, which is increasingly on an unconditional basis by being overly prescriptive in the imposition of 50% affordable. Greater clarity on the use and availably of Housing Grant should also be provided. It must be clear that 50% is a strategic target and not all sites can achieve this level of provision.

User: Earls Court Public Sector Tenants' Assoc

We are concerned that the Mayor set policy first, in election promises (of 50% ‘affordable housing’) rather than using evidence to inform policy and to then negotiate with Government around the funding required to address London’s housing need.

We are concerned that the SHMA identifies households that can afford market rents, but who want to eventually buy a home, as having a need for intermediate housing. This is a departure from the way that SHMAs have been carried out in the past. It significantly contrasts with situations in which households that can only genuinely afford social-rented homes, yet are housed in private-rented homes that they will never be able to afford without the support of housing benefit, but are not deemed to need social rented homes. This treats lower income households with inequality. It results in a higher target for intermediate housing than would previously have been assessed. We note, in addition, that the backlog of need for intermediate housing has fallen considerably since the 2013 SHMA was carried out - from 45,705 to just 4,056. The backlog of need for social rented housing however is now 40 times that of intermediate housing, having more than doubled since 2013.

We question the SHMA’s departure from usual practice. We note that Bert Provan, Occasional Senior Research Fellow at the Centre for Analysis of Social Exclusion at the LSE and who worked for many years as a Senior Civil Servant in the DWP and DCLG, assessed quite recently (using DCLG data)[1] that nationally only one in five households that benefit from help to buy schemes (such as shared ownership) have incomes below the median. He also highlights that for three out of five households it simply helped them to buy sooner – but would inevitably have bought.

The big question in terms of Policy H5 is ‘affordable to who? So-called ‘affordable’ housing covers housing that a wide range of households with incomes can access from less than £12,000 a year (we note that the average social housing income is on average £17,500 a year) to households earning £90,000 and who are in the top 15% of households in London. ‘Affordable’ housing is thus a subjective term. Sub-market housing is a more accurate description for such a wide variety of tenures.

Most types of ‘affordable housing’ do not meet the needs of households with below median income levels. Policy H5 fails to address this. It sets a target for only 15% of homes delivered to be social rented and leaves boroughs to determine whether there may be any additional. The likelihood is that in attempts to deliver 50% affordable housing, boroughs will choose to deliver intermediate housing as more can be delivered for the same cost.

The Mayor should set a strategic London-wide target as has occurred in previous London Plans, in order that London-wide need might be delivered.

We propose:

- The title of policy H5 be renamed, more accurately, ‘sub-market housing’.
- The policy should refer by name to the different types of sub-market housing.
- Targets should be set that address the need identified in the SHMA but reverting to the previous way of assessing need for intermediate housing (that is for households not able to meet the cost of market homes – including private renting).
- This should be 65% sub-market housing, comprising 50% social / low cost rented homes and 15% intermediate. It should be noted that 30,973 social / low-cost rented homes need to be delivered annually over the next 25 years in order to deal with existing and backlog of need. Delivery of less than will continue to increase the backlog of need and increase the number of years that it will take to address the backlog. It should say that if the backlog of need were to be addressed over a 10-year period the social housing target would need to be 62% (of all homes) or higher.
- The Mayor should renegotiate with the Government around the use of all affordable housing grant to enable it in total to be used to deliver social-rented homes.
- The Mayor should require that all section 106 to be used to deliver social-housing.
- Intermediate housing should be delivered without affordable housing grant.

[1] http://blogs.lse.ac.uk/politicsandpolicy/how-help-to-buy-helps-the-privileged/

User: Silvertown Homes

Expectation for grant

Policy H5 currently identifies a specific measure to achieve the strategic target for the delivery of 50% affordable housing as: ‘2) using grant to increase affordable housing delivery beyond the level that would otherwise be provided

This clause should be removed. Applications for planning permission should be determined based on their ability to provide affordable housing, without reference to grant funding. Firstly, introducing this into the decision-making process is in conflict with planning law and policy and secondly it introduces unnecessary delays to decisions being made.
There is no reason why additional funding cannot be introduced into a scheme post-permission and so raise the level of affordable housing provided on site beyond what was stipulated in the decision itself.

In practice, the London Plan monitors actual delivery of affordable housing rather than planning permissions granted. As such, the emphasis should be on expediting delivery and not on the availability or otherwise of grant funding.

User:	Silvertown Homes
Policy H5 currently identifies the following specific measures to achieve the strategic target for the delivery of 50% affordable housing as: ‘3) affordable housing providers with agreements with the Mayor delivering at least 50 per cent affordable housing across their portfolio… 5) strategic partners with agreements with the Mayor aiming to deliver at least 60 per cent affordable housing across their portfolio’ Planning law does not support any approach in which different standards are applied for different applicants. Development plan policy must be revisited so that Registered Providers compete on a level playing field with other homebuilders.	

User:	Silvertown Homes

Delivery at public sector land

‘4) public sector land delivering at least 50 per cent affordable housing across its portfolio

It is unclear what ‘its portfolio’ refers to. Again, planning law does not support any approach in which different standards are applied for different applicants.

This approach must also be considered in terms of the legal requirement of public bodies to achieve ‘best value’.

User:	Brixton Society

H5 & H6, Affordable Housing: Despite planning permissions in our borough exceeding London Plan targets, the percentage of affordable dwellings being achieved is disappointingly low. We support rigorous viability assessments and the threshold approach set out in **H6**.
We deplore the practice of dividing sites into separate phases or ownerships to evade affordable housing contributions. Smaller sites should also contribute, even if it may not be practical to do so within each site. We therefore welcome policy **H5**.

User:	Orbit

Orbit supports the Mayor’s drive to increase the supply of affordable housing across London.

In relation to the requirement for public sector land to deliver at least 50% affordable housing across its portfolio, for situations where public sector land has been purchased by a private landowner there is a lack of clarity as to whether this land is still subject to the 50% requirement?

Orbit request confirmation that in such situations, the land is no longer defined as ‘public sector land’ once the land title and register has been transferred.

User: Lands Improvement Holdings

Policy GG4 Delivering the homes Londoners need

To realistically achieve higher levels of affordable housing the London Plan must look for new solutions beyond just brownfield sites, which have failed to deliver in the past (both affordable and market housing).

London needs space to grow. There are not enough brownfield sites to meet London's projected housing needs as it is. Brownfield sites are also unevenly distributed, expensive to redevelop (due to viability challenges) and are often restricted in terms of the types of housing they can accommodate.

By their nature, brownfield sites are limited in the affordable housing they can reasonably be expected to deliver (in terms of overall quantum, location and type). This is evidenced by the low levels of affordable housing achieved in London over recent years. Most major brownfield schemes in London fail to even achieve the Mayor's 35% threshold target

In 2015/16 there were 6,675 affordable homes built (17% of all new homes built) against a 50% target of 21,195 affordable homes (London AMR 2015/16). That is a shortfall of over 14,500 affordable homes in a single year.

This is not unsurprising or unreasonable as these brownfield sites deliver other transformational benefits (eg transport infrastructure, bringing contaminated land back into use, jobs, schools etc) which cost money and require a pragmatic approach to affordable housing to ensure schemes are viable and come forward.

To offset the lower levels of affordable housing commonly achieved on brownfield sites and deliver the level of affordable homes Londoners need, which is the purpose of Policy GG4, a broader range of sites should be identified. This should include strategic urban extensions in the Green Belt where they are not environmentally valuable, well-connected to existing communities by existing or planned public transport and could deliver a significant proportion of affordable housing.

Change sought to Policy GG4

The wording of Policy GG4 should be amended as follows (or words to the effect of):

"…

E. ~~D.~~ Identify and allocate a range of sites, including small sites ***and, where appropriate, larger strategic allocations,*** *to deliver housing locally, supporting skilled precision-manufacturing that can increase the rate of building and planning for all necessary supporting infrastructure from the outset.*

…"

User: Lands Improvement Holdings

Policy H5 Delivering Affordable Housing

The draft London Plan should include new measures that will significantly boost affordable housing delivery. As drafted Policy H5 largely reflects the status quo which has failed to deliver.

The adopted London Plan set a target of 17,000 additional affordable homes per year. The need for affordable house was assessed in 2013 to be 25,600 per year. Therefore, the proposed target was already below the assessed need. Combined net affordable homes delivered in 2012/13 to 2014/15 was 22,426 units, an average of 7,475 per year. In 2015/16, only 6,675 affordable units were delivered. Therefore, there has been consistent under delivery of affordable units which places greater importance on meeting the undersupply and future demand.

Securing more affordable housing on strategic urban extensions released from the Green Belt and will boost significantly the supply of affordable housing in London.

User: London Property Alliance

Policy H5(A)(1) refers to requiring residential “and mixed use” developments to provide affordable housing. This should be amended to clarify that this refers to mixed-use developments that include residential development. The policy should be entirely unambiguous that other forms of mixed use development that do not incorporate housing are not expected to provide affordable housing. We suggest the following amended wording for H5(A)(1):

“requiring residential and mixed-use developments <u>that incorporate residential</u> to provide affordable housing through the threshold approach (Policy H6 Threshold approach to applications).”

Development proposals within Central London, especially within the CAZ, more often include an element of off-site affordable housing provision, and/or financial payments towards affordable housing provision. This is instead of on-site affordable housing.

This is because redevelopment sites in core central areas are often highly constrained. Further, the exceptionally high land values within Central London mean that the opportunity cost of providing affordable housing on-site is very high.
Providing affordable housing off-site can often lead to very substantially greater affordable housing outturns, with substantially more homes being built than if on-site delivery had been insisted upon, with all the associated opportunity costs and inefficiencies. The use of off-site provision can therefore significantly improve affordable housing outcomes. Clearly, a balance still needs to be struck to ensure that the off-site housing is appropriately located and contributes to creating a balanced and sustainable mix of tenures, but this does not necessarily require onsite provision in all cases. Payment in Lieu (‘PiL’) should also be encouraged in circumstances where neither on-site nor off-site affordable housing provision is

appropriate allowing for affordable contributions to be delivered to address a range of sites.

In land use terms, on-site provision can lead to other land uses, which are also vital within the CAZ and which could not be provided or sustained outside of it, being displaced. Draft Policy SD5A notes that “New residential development should not compromise the strategic functions of the CAZ.” The CAZ SPG recognises the need for flexibility in applying requirements for on-site housing or nearby (paragraph 1.4.13). The Alliance considers that this flexibility needs to be applied to policy H5 when considering affordable housing provision in the CAZ.

Likewise, in some cases - especially smaller developments where factors such as small plot sizes, or limited frontage widths make including multiple tenures impractical - PiL will enable better affordable outcomes to be achieved.

Whilst the Alliance understands the priority for affordable housing to be provided onsite, we suggest that Part B of Policy H5 is moderated to accept that off-site may also be acceptable in some instances, particularly in the CAZ, especially when this leads to more or better affordable housing. It should not be necessary to demonstrate exceptional circumstances whenever off-site affordable housing provision is proposed, particularly within the CAZ.

The use and benefit of using affordable housing credits, particularly in the CAZ, is identified within the current adopted London Plan (para 2.45) and the CAZ SPG.The CAZ SPG recognises that affordable housing credits can deliver benefits as in some instances they help to sustain important commercial clusters, whilst delivering a greater quantity and better quality of affordable housing. The way in which affordable housing credits are delivered – i.e. brought forward in advance of any policy requirements – also assists in delivering affordable housing sooner within development pipelines. It also acts as an incentive for developers to consider additional affordable housing opportunities when delivering schemes, and maximising these opportunities to the fullest (and above policy requirements).

For these reasons, the Alliance considers that land use swaps and affordable housing credits could be constructively used to meet affordable housing policy. This is particularly relevant in central Westminster, where land ownership is relatively consolidated and there may be opportunities to use economies of scale and a land owner/developer's other holdings to deliver more affordable housing, earlier, than a purely-site specific approach. Policy H5(B) should be amended to make reference to the role that affordable housing credits can play, to incentivise and deliver affordable housing and to promote the strategic aims of the CAZ.

The Alliance is concerned that, as drafted, the policy H5 could disincentivise developers from using off-site and payment in lieu mechanisms to maximise the overall delivery of affordable homes, in contrast to the objectives of the policy.

Policy H5(B) should be clear that the preference for on-site affordable housing relates to affordable housing that is required as a result of the operation of Policy H6. Where housing, whether affordable or not, is required/provided in response to local mixed use policies, Policy SD5(I) should apply i.e. taking into account the potential to use land use swaps, credits and off-site contributions. There should be no requirement within Policy H5 for such housing to be on-site within commercial developments where local mixed use policy gives rise to an affordable housing requirement.

We suggest the following amendments to Policy H5(B):

"Affordable housing <u>arising from the application of Policy H6</u> should <u>generally</u> be provided on site in order to deliver communities which are inclusive and mixed by tenure and household income, providing choice to a range of Londoners.

Outside the CAZ, affordable housing must only be provided off-site or as a cash in lieu contribution in exceptional circumstances.

Within the CAZ, on-site provision will be preferred. The use of affordable housing credits and off-site provision will be acceptable where it can be shown that this would lead to an improvement to the quantity or quality of residential units provided and continue to contribute to creating inclusive and mixed tenure communities. Payment in lieu will be acceptable where on-site and off-site provision have been shown to be impractical."

User:	Paul Benedyk

Non-negotiable minimum quotas of affordable housing should be developed within the local plan area.

User:	Bishopsgate Goods Yard Regeneration Limited

Our client acknowledges the need for additional affordable housing in London and the target identified within the policy at 50 per cent of all new homes. In our experience, achieving 50 per cent affordable housing is unrealistic. Further, our client would also like to see some emphasis and recognition of the frequently competing needs of planning obligations that developers face, in respect of Section 106 obligations and the mayoral and local community infrastructure levy and the impact this has on viability of schemes and ultimately the delivery of affordable housing. It would be beneficial if the London Plan identified priority so that relief can be applied to in order to ensure the priority is delivered.

User:	Bishopsgate Goods Yard Regeneration Limited

Our client recognises the merits of the policy in that it reacts to the needs of the Borough directly instead of applying a blanked approach. Although the approach is supported, there needs to be acknowledgement in the policy wording that the overall affordable housing offer is likely to be effected by the tenure split of the affordable offer. For example, a scheme that has a significantly higher proportion of social rented accommodation compared to intermediate may only be able to viably offer a lower proportion of affordable housing, below that of the policy target. The London Plan needs to recognise this point so as not to stifle development and the delivery of the types of affordable accommodation that the Borough needs.

User: Barratt Developments plc

Policy H5 currently identifies a specific measure to achieve the strategic target for the delivery of 50% affordable housing as:
‘2) using grant to increase affordable housing delivery beyond the level that would otherwise be provided’

This clause should be removed. Applications for planning permission should be determined based on their ability to provide affordable housing, without reference to grant funding. Firstly, introducing this into the decision-making process is in conflict with planning law and policy and secondly it introduces unnecessary delays to decisions being made.

There is no reason why additional funding cannot be introduced into a scheme post-permission and so raise the level of affordable housing provided on site beyond what was stipulated in the decision itself.

In practice, the London Plan monitors actual delivery of affordable housing rather than planning permissions granted. As such, the emphasis should be on expediting delivery and not on the availability or otherwise of grant funding.

User:	Barratt Developments plc

Policy H5 currently identifies the following specific measures to achieve the strategic target for the delivery of 50% affordable housing as:

‘3) affordable housing providers with agreements with the Mayor delivering at least 50 per cent affordable housing across their portfolio… 5) strategic partners with agreements with the Mayor aiming to deliver at least 60 per cent affordable housing across their portfolio’

Planning law does not support any approach in which different standards are applied for different applicants. Development plan policy must be revisited so that Registered Providers compete on a level playing field with other homebuilders.

User: Barratt Developments plc

Seeking grant:

Part C 4) of this policy states that to ‘follow the Fast Track Route of the threshold approach, applications must meet all the following criteria… demonstrate that they have taken account of the strategic 50 per cent target in Policy H5 Delivering affordable housing and have sought grant where required to increase the level of affordable housing beyond 35 per cent’.

For the same reasons set out above, this clause should be removed. Applications for planning permission should be determined based on their ability to provide affordable housing, without reference to grant funding.

User: London Borough of Newham

Policy H5 Delivering Affordable Housing

LBN are supportive of the overarching strategic aspiration 50% affordable target which accords with Newham's adopted and emerging Local Plan, welcoming the Mayor's use of grant to boost affordable housing supply and the commitment to ensure Mayoral agreements with affordable housing providers and strategic partners in terms of delivery. It would however be useful for the plan to set out the Mayor's approach in achieving such agreements. LBN are also supportive of the emphasis on on-site affordable housing provision, unless exceptional circumstances can be demonstrated, and consider that this broadly aligns with the LBN's approach, whereby off-site provision is only considerable if on-site is undeliverable or would result in less affordable housing delivered. LBN however object to the application of a blanket approach to affordable housing set out by the threshold approach, which does not accord with LBN's policy position. The reasoning behind this objection is set out in more detail within our response to Draft Policy H6.

User: Stamford Norfolk Limited

The delivery of ‘genuinely affordable’ housing should be afforded significant weight as
a material consideration in favour of a planning application –

As set out at Appendix 2, there is significant identified need for affordable housing. In view of this, where planning applications deliver affordable housing (on or off -site or via a commuted payment) this should beidentified as a significant consideration that weighs in favour of a planning application. The draft
London Plan does not currently advise this. A presumption is again important because it will elevate this matter as a planning consideration for the decision-maker.

APPENDIX 2 – HOUSING NEED, SUPPLY AND DELIVERY (BARTON WILLMORE)

Housing Need and Housing Supply
Paragraph 2.3.3 of the draft London Plan advises both that:
• ‘the GLA’s new Strategic Housing Market Assessment shows that London has a need for approximately 66,000 additional homes a year’ ; and
• ‘the Strategic Housing Land Availability Assessment suggests that London has the capacity for around 65,000 additional homes a year and the housing targets in this Plan reflect this’ .
In terms of the latter, Table 4.1 of the draft London Plan (which sets out ‘10 year targets for net housing completions (2019/20-2028/29)’), adds up to 64,935 homes per annum. The draft London Plan does not set a target beyond 2028/29.
It is self-evident that 64,935 homes is less than ‘approximately 66,000’ . The draft London Plan accordingly falls short of addressing identified need.

Government Consultation
Moreover, in September 2017 the government held a consultation called ‘Planning for the right homes in the right places’ . This proposed a standardised methodology for measuring housing need. Its methodology identifies London’s need for the period 2016 -2026 as 72,400 additional homes per year.
The Mayor of London’s response to this consultation (9 November 2017) incl uded the statement that

‘we note that much of the difference between DCLG’s figure of 72,000 and our own estimate of 66,000 is down to the longer time period used for the latter’ . This statement is hard to substantiate. The draft London Plan may address the period up to 2041 but it does not set a housing target any further than 2028/29 (the timescale provided in Table 4.1).
The Mayor of London’s ‘2017 London Strategic Housing Market Assessment’ (SHMA) (November 2017) provides more commentary on this point stating that:
‘The DCLG formula can however be applied to a longer timescale, as DCLG’s 2014 -based household projections are available up to 2039. When projected household growth over the ful l 2016-2039 period of DCLG projections is fed into the formula it produces an annualised figure of 68,455 homes for London, closer to the figure arrived at using the method in this SHMA’ (paragraph 7.25).
Whilst this 68,455 homes figure may be closer to the Table 4.1 figure (64,935) this still represents a difference of 3,520 homes per annum or 35,200 homes over a 10 year period. To put this figure into perspective, there are c.35,000 homes in Borehamwood or Billericay.

Home Builders Federation’s Analysis
The Home Builders Federation uses the government’s analysis as the basis for a different conclusion on housing need. Its representations to the draft London Plan cite a rationale for why the Objectively Assessed Need for London should be the ‘uncapped requirement’ of 92,000 homes per annum (rounded for ‘the purposes of plan-making’).

Summary of Housing Need
All in all, taken on face value the draft London Plan does not identify sufficient supply to meet identified need. The government’s proposed standardised methodology and analysis by the Homebuilders Federation both indicate that need is significantly higher.

User: Centre for London

Policy H5 Delivering affordable housing

We support the aim of significantly increasing affordable housing levels in London, and the ambitious targets proposed, though *Ideas above your Station: Exploring the potential for development at London's stations (2017)* does argue that flexibility needs to be shown where schemes are also delivering significant transport infrastructure improvements.

- **"The Mayor, the GLA and the London boroughs should adopt a tailored approach to affordable housing in over-station developments in order to reflect the value of station improvements; they should also encourage the use of review mechanisms to ensure viability and share value uplifts."**

However, as set out in our report *Strength in Numbers : Funding and Building More Affordable Housing in London* (2017) we do not believe that on-site provision is always the best option. We appreciate the value of mixed communities, but believe this needs to be balanced against London-wide considerations, including the potential to build significantly more homes and enhancing social mix at the same cost in outer London (where there are fewer affordable homes to start with). Our report recommends a collaborative approach across London, facilitated by the Mayor:

- "The GLA should help broker formal borough partnerships in housing delivery, and use its policies, powers and resources, including publishing a best practice guide, to facilitate and encourage collaboration."

- "The GLA should incentivise collaborative affordable housing delivery through more flexible or enhanced levels of grant for consortia of local authorities, together with housing associations and private developers. The Mayor and London boroughs should also develop a more strategic London-wide approach to building new affordable housing, embedded in the London Plan."

User: Persimmon Homes

In line with London Plan, larger scale housing developments are primarily being delivered by re-use of brownfield land with their associated remediation and higher development costs. The London Plan policies and standards such as those in relation to internal space standard, energy efficiency / zero carbon / district heating, cumulatively have an impact on development viability. It is evident from the schemes that go before the Major through Stage 1 and 2 reviews that in a significant proportion of cases, schemes at present cannot viably meet the London Plan Policies and Standards and deliver a fully Policy compliant level of affordable housing.

Due to the costs, the affordable housing target is proving unachievable in the vast majority of instances. It is particularly unrealistic in regeneration areas where revenues are lower but costs remain high. The ‘strategic’ target is often adopted into London Local Authorities plans. The target gives rise to protracted negotiations and viability reviews which delay the progression of schemes and give rise to significant uncertainty.

The mayor needs to assess and evidence the cumulative impacts on development of all local standards, supplementary planning documents and policies on development viability. This form of assessment is outlined in para 173 / 174 of the NPPF. It is considered that in many cases the cumulative impact of these standards and policies puts implementation of the plan at serious risk.

To encourage investment in regeneration areas and to recognise that development viability is not the same across the whole of London, Policy H5 should recognise that this is a ‘maximum’ and that Boroughs should set their own local target in light of evidence on viability, market conditions and the need to bring forward sites to deliver housing targets in the London Plan.

User:	Legal and General Capital

Policy H5 Delivering Affordable Housing

The draft London Plan should include new measures that will significantly boost affordable housing delivery. As drafted Policy H5 largely reflects the status quo which has failed to deliver.

The adopted London Plan set a target of 17,000 additional affordable homes per year. The need for affordable housing was assessed in 2013 to be 25,600 per year. Therefore, the proposed target was already below the assessed need. Combined net affordable homes delivered in 2012/13 to 2014/15 was 22,426 units, an average of 7,475 per year. In 2015/16, only 6,675 affordable units were delivered. Therefore, there has been consistent under delivery of affordable units which places greater importance on meeting the undersupply and future demand.

Requiring a significant proportion of affordable housing on strategic urban extensions released from the Green Belt will boost significantly the supply of affordable housing in London.

User: Blackheath Society

Policies H5 Delivering affordable housing; H6 Threshold approach to applications; H7 Affordable housing tenure; and H8 Monitoring affordable housing: We support the introduction of these policies and the thrust of the draft supporting text. As noted earlier in connection with Policy D8, we believe there should be a much higher level of transparency/accountability in relation to viability assessments to enable informed debate with interested parties other than the local authority. We strongly support Policy H7 on genuinely affordable housing and in particular the treatment of London Affordable Rent at Policy H7A1 and paragraph 4.7.4. We welcome the prospect of compliance with affordable housing targets being monitored more rigorously than has been the case to date.

User:	Clarion Housing Group

We expect to deliver at least 5,000 high quality, new affordable homes in the capital by 2021, 30% of which will be at genuinely affordable rents with 70% for shared ownership. However whilst we are prepared to deliver 50% affordable homes across future pipeline sites (even though it can impact viability) fast-tracking applications on public land which match this criteria and providing additional subsidy would ease viability and enable us to provide increased affordable housing provision.

User: Dagenham Dock Limited

Draft Policy H5 – Delivering Affordable Housing

Draft Policy H5 sets a strategic target of 50% of all new homes delivered across London to be affordable. In response, DDL believe that there should be greater flexibility in the Plan's policies on affordable housing. Greater flexibility will allow for a wider range of homes to be delivered which are more focussed on the local needs of each borough – see further comments below on Section H.

User:	Aitch Group

My client fully supports the Mayors aspirations for affordable housing delivery, but is concerned that a 50% target is setting himself up to fail, given how difficult it is to get anywhere close to this level on may sites in London.

My client would endorse pursuing maximum reasonable levels of provision on a site by site basis.

User: DTZ Investors

Policy H5: Delivering affordable housing & Policy H6: Threshold approach to applications

It is accepted that affordable housing from residential and mixed-use developments should generally be sought on-site [as long as the mixed use development includes residential provision that triggers an affordable housing requirement in itself]. However, the requirement of part B of draft Policy H5 that affordable housing should be delivered on-site does not acknowledge that it is not always practicable or viable to secure mixed tenure housing provision within mixed use schemes on constrained sites, particularly in central London.

The policy also does not recognise that development proposals in central London can often secure more and better quality affordable housing through off-site provision, through development in the vicinity of the application site, or elsewhere if funded by a contribution in lieu of provision. As off-site delivery of affordable housing is relatively common in central London, it is considered too inflexible for Policy H5 to allow off-site provision or a contribution in lieu of provision only in exceptional circumstances.

In seeking to deliver affordable housing under draft Policy H5, serious concern is also expressed that the accompanying draft policy H6 sets a threshold level for affordable housing provision at 50% for Strategic Industrial Locations (SILs), Locally Significant Industrial Sites (LSIS) and other industrial sites deemed appropriate to release for other uses, in order to benefit from the Mayor's Fast Track Route (whereby applications for major residential developments are not be required to submit viability assessments for review).

Policy E7 of the draft London Plan, advises Development Plans and planning frameworks should consider "whether certain logistics, industrial and related functions" in selected parts of SILs and LSIS "could be intensified and/or co-located with residential and other uses, such as social infrastructure, or to contribute to town centre renewal." However, critical to this approach is the requirement of Part E of the policy for "an increase (or at least no overall net loss) of capacity in terms of industrial, storage and warehousing floorspace with appropriate provision of yard space for servicing."

The requirement for redevelopment schemes within SIL or LSIS to retain or increase industrial, storage and warehousing floorspace and provide service yards, presents a significant constraint for redevelopment of these sites, with the need for careful design to accommodate these employment uses alongside residential development and the need for yard areas inevitably reducing the level of market housing that can be delivered on site, with a significant impact on viability for redevelopment. Additionally, active and passive extensive noise mitigation measures for SIL and LSIS site will be required to ensure industrial activities are not compromised by residential development in accordance

with to the ‘Agent of Change Principle’ to be followed under draft Policy D12.

Coupled with the likelihood that housing on sites alongside industrial uses is also likely to secure lower revenues for developers than in established residential areas, the effect of these measures will inevitably make redevelopment of these sites more challenging and squeeze the viability of redevelopment schemes, which could compromise the development of emerging new communities and the regeneration of areas (in particular Opportunity Areas with substantial levels of protected industrial land).

The basis for setting of a 50% affordable housing requirement for proposals on Strategic Industrial Locations, Locally Significant Industrial Sites and other industrial sites to benefit from the Fast Track route (without the need for a viability assessment) instead of the 35% for development of all land not in public ownership will be likely to mean that all major schemes for redevelopment of these sites are likely to require viability appraisals to demonstrate how this level of affordable housing provision cannot be achieved. This requirement is likely to significantly to slow up the determination of planning applications (and add significant costs) and in turn delay the delivery of new housing and employment. The effect of this approach will be particularly felt in Opportunity Areas, which are expected to contribute to the delivery of circa 87% of the total housing in London over the next 10 years. (568,000 of 650,000 units) and thus the proposed policy could compromise achieving the Mayor’s ambitious proposed housing targets.

Change Sought – It is requested that draft Policy H5 provide greater flexibility by explicitly recognising that within inner London off-site affordable housing provision may be considered acceptable where it can be demonstrated that this would lead to an improvement to the quantity or quality of affordable housing provision compared to that which might be practically and viably achieved on-site. Recognition should also be made to a payment in lieu of provision being deemed acceptable where either on-site or off-site provision is not practicable or viable.

It is also requested that Part (B)3 of draft Policy H6 be deleted to remove reference to a threshold level of affordable housing for residential development of Strategic Industrial Locations, Locally Significant Industrial Sites and other industrial sites being set at 50% in order to benefit from the Mayors Fast Track Route, in favour of applying the 35% threshold to all land not in public sector ownership.

User:	London Sustainable Development Commission

Housing - The commission recognises the acute need to deliver more housing and supports the Plan's focus on housing delivery. However, the push for delivery of higher housing numbers must not be at the expense of sustainability standards. There is a clear risk that sustainability performance functionalities are likely to be 'value engineered' out from a cost cutting perspective, given the range of competing priorities and costs on development. This is picked up to a certain extent in supporting text to Policy H5 (Para 4.5.4) but this point needs to be made more explicitly and clearly. A clear statement is required regarding the priority to be given to ensuring that new homes and commercial buildings will perform to high sustainability standards.

User:	London Borough of Ealing

The Council supports these policies which are largely based on the previously published Affordable Housing and Viability Supplementary Planning Guidance (SPG), August 2017.

User: Highgate Society

H5A.5 - Object

Strategic partners should deliver at least 60%affordable housing and more for the first 5 years. The number of affordable homes built each year reduced from 2010 at 36,700 to 1,102 in 2016/17. However, this will require public funding, as in our responses to Policy GG4 (B) above.

User: Leathermarket JMB & CBS

Section 4: Building genuinely affordable homes
The JMB agrees with the submission from London Tenants Federation that the priority should be for households on the London medium income of £39,000.

We realise that the GLA works within a funding regime set by the government, but schemes aimed at households with an income of £60,000 to £90,000 are regressive: with many people on lower income subsidising home ownership options for the better off.

An analysis of the housing crisis should lead to the conclusion that:

All new private developments should have 25% council rent and 25% London living rent homes, with the remaining 50% for sale.

If this requirement is rigorously imposed by all London councils this will reduce land values and make providing affordable housing an economic proposition. It will also stop developers using the viability assessment argument to reduce the element of genuinely affordable homes.

The JMB agrees with London Tenants Federation that the priority should be to build council rent homes on GLA and Council land. A requirement of at least 75% council rent homes should be applied.

The Mayor should also be acutely sensitive to the loss of council rent homes.

In practice this means not agreeing any estate demolition unless there is demonstrable resident support, including a formal ballot and no loss of council/ housing association rent homes.

Most London Council's are reporting that 40% of ex-right to buy homes are now buyto-rent. Scotland and Wales have suspended right to buy. The housing crisis in London is more acute.

The Mayor should call for the suspension of right to buy or the ending of the discount and other requirements to sell council homes at below their market value.

User: Leathermarket JMB & CBS

Section 5: High quality homes and inclusive neighbourhoods

The GLA should prioritize supporting genuinely democratic and participatory housing providers.

The requirement that organisations bidding for Innovation funds should be registered providers should be removed. This excludes community-led housing organisations
Again we agree with London Tenants Federation, that being genuinely democratic and participatory should be a critical element of the funding criteria. This is a particularly relevant test for larger housing associations.

To encourage smaller democratic organisations there should be a requirement that any development of over 100 homes (public or private), should have 10% developed by community-led housing organisations

The Community Housing Hub should set up a separate organisation (outside government borrowing restrictions) to borrow money and then lend to community-led housing groups.

As demonstrated by Leathermarket JMB, tenant managed organisations, are an excellent vehicles to allow existing communities, with a track record of selforganisation to build new homes.

The government has withdrawn funding for council tenants to exercise their right to manage. The GLA should re-introduce this funding

User:	London Chamber of Commerce and Industry

Policy H5 Delivering affordable homes

70. LCCI recognises that there must be mix of housing stock to cater for the varying needs of all Londoners, including both homes to rent and to buy. An LCCI survey of London businesses reflects the growing importance of affordable homes to rent for Londoners35, which were viewed as equally as important to an improved supply of affordable homes to own.

71. Critical to addressing the problem of Londoners been priced out of the housing market is building more homes. For decades, London has not been able to keep up with demand, with just 29,000 homes built in 2016. This needs to double to meet current demand36

User: Design Council

Affordable Housing

18. We support the Mayor’s commitment to delivering genuinely affordable housing and the focus in the new draft London Plan to ensure a consistent approach to thresholds and viability testing is applied throughout London.

User:	Design Council

19. We support requirement in Policy H5 (a) that public sector land should deliver at least 50% affordable housing across its portfolio, however we are concerned that this aim may be undermined by financial pressure to sell off land. We would encourage that the Mayor should work with public sector bodies to keep land in public ownership and stewardship where possible. Where public sector land is disposed of, its subsequent development should also be subject to the requirement in Policy H5 (a) (4).

User: Gravesham Borough Council

The Strategic Housing Market Assessment (SHMA) indicates a need for 65,878 new homes a year in London, of which 43,500 should be affordable but the London Plan target is for only half of these new homes needed per year to be affordable.

The plan suggests a ‘strategic target of 50% of all new homes being genuinely affordable’ with individual schemes at 35% or above being fast tracked (pg161). A 50% target is also set aside for development on public sector land, but this is to be applied ‘across the portfolio’ rather than on a site-specific basis (pg167).

It states that affordable housing will be measured on the basis of habitable rooms1 rather than units with a requirement for figures to be presented as a percentage of total provision in terms of habitable rooms, units and floorspace to enable comparison (p166). In a change to previous plans, it states that family housing can now be considered as two bedroom and above rather than three bedroom and above (p179). This is welcomed as the plan needs to be based on how people live now rather than historic assumptions.

The following tenure of affordable homes is proposed: 30% low cost (Social or London Affordable Rent), 30% intermediate (including London Living Rent and Shared Ownership) and 40% to be determined by the borough depending on local need (p169).

The Council is aware that the 2004 version of the London Plan included a 50% target for affordable housing provision and that this was not delivered. This is concerning because the draft plan contains no additional incentives to ensure the target is delivered and does not explain its economic viability. The accompanying viability study2 suggests that in lower value areas, it is only the lower density schemes that may be able to achieve 35% affordable housing and for these 50% affordable housing is not generally viable.

User: Countryside Properties PLC

3. **The delivery of '*genuinely affordable*' housing should be afforded significant weight as a material consideration in favour of a planning application –** Given the scale of need for affordable housing, the fact that a planning application will deliver affordable housing (on or off-site or via a commuted payment) should be identified as a significant consideration that weighs in favour of a planning application. Countryside are supportive of the Mayor's target to ensure that 50% of all new homes delivered on public sector land across London are affordable. In other instances, we will work with the Mayor of London and other development partners, such as Registered Providers, to ensure that our developments deliver the maximum viable amount of affordable housing and result in mixed and balanced communities.

A presumption in favour of affordable housing provision is again important because it will elevate this matter as a planning consideration for the decision-maker and ensure that developments that deliver genuinely affordable housing are fast tracked through the determination process.

User: National Health Services England, National Health Services Improvement, Community Health Partnerships.

We suggest the following revised wording for Policy H5:

A. The strategic target is for 50 per cent of all new homes delivered across London to be affordable. Specific measures to achieve this aim include:
1. requiring residential and mixed-use developments to provide affordable housing through the threshold approach (Policy H6 Threshold approach to applications)

2. using grant to increase affordable housing delivery beyond the level that would otherwise be provided
3. affordable housing providers with agreements with the Mayor delivering at least 50 per cent affordable housing across their portfolio
~~4. public sector land delivering at least 50 per cent affordable housing across its portfolio~~
4. strategic partners with agreements with the Mayor aiming to deliver at least 60 per cent affordable housing across their portfolio.

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

User:	Tetlow King Planning

This is an objection and it is on behalf of Tetlow King Planning who have several projects running in the plan area.

The objection relates to affordable housing and specialist housing for the elderly.

User:	South West London and St George's Mental Health NHS Trust

The Trust supports the Mayor’s aims to boost the supply of housing and to deliver more affordable homes for Londoners. This draft policy notes that affordable housing should be provided on site in order to deliver communities which are inclusive and mixed by tenure and household income, providing choice to a range of Londoners.

As with our comments on other draft policies, we consider it important to highlight that affordable housing should not be sought at the cost of investment in important services, including healthcare, that are necessary to the successful functioning of London.

Where affordable housing is provided on surplus NHS land it should be aimed at, in the first instance (for example by way of a nominations agreement), providing accommodation for healthcare staff and other NHS workers in line with the aims of the 2017 Naylor Review.

User:	Thames Valley Housing Association

TVHA are supportive of Policy H5 ‘Delivering affordable housing’ and the strategic target of 50% of new homes being affordable. Paragraph 4.5.1 ‘Meeting the need for circa 43,500 affordable homes per year.’ is especially relevant and supported.

User:	Hornsey & Wood Green Labour Party

We strongly support the delivery of a higher proportion of affordable housing, and agree that this should mean *genuinely* affordable, not as currently, up to 80% of market rent. We consider that the proposed initial threshold for affordable housing should be 45% not 35%, and that it should be reviewed with a view to increasing this to 55% in 2021. The overall aim that 50% of all new homes to be affordable across London should also be increased to 55%.

User: Ruth Blair

In conclusion the key objective of increasing affordable housing is laudable, but the targets are

- unrealistic

- unfunded

- unpopular

and unstainable.

What's more, the targets are not designed to benefit Londoners but to further the interests of overseas offshore investors such as M3 Capital Partners - behind the hideous 24-storey luxury tower block at 100 Avenue Road NW3 - with whom the Mayor may have met on his trip to Chicago within weeks of his 'victory'.

Further in the attempt to achieve this key objective the draft plan is seeking to set aside much of the existing planning framework, in a way that is detrimental to London and not in accordance with legislation and National Planning Policy.

User: Mr Gary Hayes

H5 Delivering affordable homes

5.1 We are concerned that the Mayor set policy first, in election promises (of 50% ‘affordable housing’) rather than using evidence to inform policy and to then negotiate with Government around the funding required to address London’s housing need.

5.2 We are concerned that the SHMA identifies households that can afford market rents, but who want to eventually buy a home, as having a need for intermediate housing. This is a departure from the way that SHMAs have been carried out in the past. It significantly contrasts with situations in which households that can only genuinely afford social-rented homes, yet are housed in private-rented homes that they will never be able to afford without the support of housing benefit, but are not deemed to need social rented homes. This treats lower income households with inequality. It results in a higher target for intermediate housing than would previously have been assessed. We note, in addition, that the backlog of need for intermediate housing has fallen considerably since the 2013 SHMA was carried out - from 45,705 to just 4,056. The backlog of need for social rented housing however is now 40 times that of intermediate housing, having more than doubled since 2013.

5.2 We question the SHMA’s departure from usual practice. We note that Bert Provan, Occasional Senior Research Fellow at the Centre for Analysis of Social Exclusion at the LSE and who worked for many years as a Senior Civil Servant in the DWP and DCLG, assessed quite recently (using DCLG data)4 that nationally only one in five households that benefit from help to buy schemes (such as shared ownership) have incomes below the median. He also highlights that for three out of five households it simply helped them to buy sooner – but would inevitably have bought.

5.3 The big question in terms of Policy H5 is ‘affordable to who? So-called ‘affordable’ housing covers housing that a wide range of households with incomes can access from less than £12,000 a year (we note that the average social housing income is on average £17,500 a year) to households earning £90,000 and who are in the top 15% of households in London. ‘Affordable’ housing is thus a subjective term. Sub-market housing is a more accurate description for such a wide variety of tenures.

5.4 Most types of ‘affordable housing’ do not meet the needs of households with below median income levels. Policy H5 fails to address this. It sets a target for only 15% of homes delivered to be social rented and leaves boroughs to determine whether there may be any additional. The likelihood is that in attempts to deliver 50% affordable housing, boroughs will choose to deliver intermediate housing as more can be

delivered for the same cost.

5.5 The Mayor should set a strategic London-wide target as has occurred in previous London Plans, in order that London-wide need might be delivered.

5.6 We propose:

? The title of policy H5 be renamed, more accurately, ‘sub-market housing’.

? The policy should refer by name to the different types of sub-market housing.

? Targets should be set that address the need identified in the SHMA but reverting to the previous way of assessing need for intermediate housing (that is for households not able to meet the cost of market homes – including private renting).

? This should be 65% sub-market housing, comprising 50% social / low cost rented homes and 15% intermediate. It should be noted that 30,973 social / low-cost rented homes need to be delivered annually over the next 25 years in order to deal with existing and backlog of need. Delivery of less than will continue to increase the backlog of need and increase the number of years that it will take to address the backlog. It should say that if the backlog of need were to be addressed over a 10- year period the social housing target would need to be 62% (of all homes) or higher.

? The Mayor should renegotiate with the Government around the use of all affordable housing grant to enable it in total to be used to deliver social-rented homes.

? The Mayor should require that all section 106 to be used to deliver social-housing.

? Intermediate housing should be delivered without affordable housing grant.

User:	Landsec

H5 Delivering Affordable Housing: We recognise and support the need for more affordable homes and note that 50% is an ambitious target. To be delivered it requires not just an increase in central government funding and public-sector housing delivery, but also the Mayor and LPA’s collaborating with developers and adopting a flexible approach to affordable tenures to encourage the delivery of the highest number of affordable homes.

User:	Landsec

H5 Part B: Offsite and cross borough Affordable Housing provision: Whilst we understand the preference for onsite Affordable Housing provision, in practice this is very restrictive and does not always maximise the delivery and quality of additional housing, particularly in central boroughs and tightly constrained urban areas. We support the Mayor’s aspiration to increase the overall supply of housing and affordable homes and therefore encourage the Mayor to be far more flexible about offsite provision and its location where it can be demonstrated that mixed and balanced communities can be maintained. The Mayor and GLA should use its London wide oversight to permit the delivery of Affordable Housing offsite and across different boroughs, especially where this will result in the delivery of more homes. We encourage you therefore to consider the amendments proposed to Policy H5(B) by the BPF, the Alliance and London First.

User: Julian Cheyne

Seventh, as stated above 'affordable' housing no longer has meaning. Affordable should be replaced by the term social housing and the term social housing should only be used when it applies to housing at Council rent levels.

Eighth, policies on 'affordable' or under the new definition of 'social housing' should be strengthened to ensure that schemes include at least 50% social housing. If there are other intermediate schemes or just higher rent 'affordable' housing these should be on top of the 50% requirement.

Ninth, I consider it is desirable to build schemes which are 100% social housing. Social housing has been incorrectly dismissed as undesirable in itself. The reality is that mixed housing has simply been used as a means of demolishing social or council housing. The new 'mixed' schemes often include undesirable elements such as poor doors and other discriminatory elements which simply continue the same process of rendering social or '(un)affordable' housing second rate and undesirable.

User: Landsec

H5: Affordable Housing Credits (AHC): we also believe that land use swaps and affordable housing credits may also be constructively used to meet affordable housing policy. The current system delays the delivery of Affordable Housing until “need” can be met by an affordable housing generating development. An AHC system would enable sites that have been identified for affordable housing to be delivered as soon as possible, with the units created offset against a scheme that is better suited to meeting an affordable housing requirement. Landsec did this very successfully in Westminster with a scheme called Wilton Plaza (WP). WP delivered 74 affordable housing units, 68 of which were granted the status of an AHC and were completed in May 2009. 25 units were allocated to our Wellington House development that completed in October 2012, and the remaining 43 were allocated in 2014 to Arundel Great Court (a scheme that is still yet to be fully constructed). Compared to the normal process for delivering affordable housing, the AHC mechanism enabled 25 units to be delivered 3.5 years early and arguably the remaining 43 would still not have been delivered. There have been other instances where we have found a site capable of delivering offsite affordable housing but been unable to do so because we are not yet able to deliver the scheme that generates the requirement. However, if we had the benefit of AHC we could proceed with its delivery knowing that we could offset the costs against (1) the generating scheme if it is undertaken; (2) another scheme in our portfolio; or (3) via a third party that has also generated the need for Affordable Housing.

We think it would therefore be a very positive addition for Policy H5 to promote Affordable Housing Credit schemes where appropriate, as it would help enable the early delivery of Affordable Housing in London.

User: Redrow Homes London Division.

Policy H5 currently identifies a specific measure to achieve the strategic target for the delivery of 50% affordable housing as:
‘2) using grant to increase affordable housing delivery beyond the level that would otherwise be provided’

This clause should be removed. Applications for planning permission should be determined based on their ability to provide affordable housing, without reference to grant funding. Firstly, introducing this into the decision-making process is in conflict with planning law and policy and secondly it introduces unnecessary delays to decisions being made.
There is no reason why additional funding cannot be introduced into a scheme post-permission and so raise the level of affordable housing provided on site beyond what was stipulated in the decision itself.

In practice, the London Plan monitors actual delivery of affordable housing rather than planning permissions granted. As such, the emphasis should be on expediting delivery and not on the availability or otherwise of grant funding.

User: Redrow Homes London Division.

Policy H5 currently identifies the following specific measures to achieve the strategic target for the delivery of 50% affordable housing as:

‘3) affordable housing providers with agreements with the Mayor delivering at least 50 per cent affordable housing across their portfolio… 5) strategic partners with agreements with the Mayor aiming to deliver at least 60 per cent affordable housing across their portfolio’

Planning law does not support any approach in which different standards are applied for different applicants.

Development plan policy must be revisited so that Registered Providers compete on a level playing field with other homebuilders.

User:	Redrow Homes London Division.

‘4) public sector land delivering at least 50 per cent affordable housing across its portfolio’

It is unclear what ‘its portfolio’ refers to. Again, planning law does not support any approach in which different standards are applied for different applicants. This approach must also be considered in terms of the legal requirement of public bodies to achieve ‘best value’.

User: Ms Patricia Quigley

Whilst we welcome a plan for housing in London, **we have concerns around the jargon used in the London Plan and we don't think it goes far enough to ensure that we build enough genuinely affordable homes**, preferably ‘not for profit’ council homes.

We acknowledge that the term 'affordable' is a Government coined legal term, but **as Labour Mayor you should lead the way in rejecting Tory rhetoric, which stops us looking at the reality of high cost living in a low wage economy.** What is affordable is subjective. We think you appreciate that 80% of market rate, defined by the Government as affordable, is quite clearly UNaffordable for many in need of a home, particularly in Hackney, where the average wage is 33k.

We object to the inclusion of shared ownership within your 'affordable' framework. Many shared ownership residents we have reported they are spending up to 50% of their income on rent, mortgage and service charges for their homes. Service charges are concerning in themselves, with developer appointed managing agents typically charging £3k a year for a one bedroom flat in Hackney. These service charges include large management fees and do not seem to prioritise value for money for tenants. We have also noted that shared ownership tenants in Hackney rarely increase their stake in their homes.

Moreover the entire shared ownership model is stacked in favour of the developer at the expense of would-be buyers, making them poor value which should not be touted as affordable. Please consider the following:

1. Shared ownership introduces new buyers to the market who would otherwise be unable to get a mortgage, thus creating demand. Developers are then able to take advantage of this new market through the receipt of a guaranteed purchase price for shared ownership homes.

2. The flats are not sold in the usual way as they are not exposed to market forces (you cannot submit an offer) – the price is determined by a valuation – thus the developer is guaranteed the valuation price and the buyer is obliged to pay the valuation price.

3. These valuations are often inflated, or optimistic, particularly when you consider that they are new builds and in any slump will likely be the first to lose value on the open market. This is another reason we think they are poor value and should not be touted as affordable.

It is heartening to see that within your draft plan some homes will be provided at a reduced (from market rent) rate. This has been referred to

as a **'Living Rent' within your 'Genuinely Affordable' campaign**, where you state that the average cost of a two bedroom flat is around £1,000 a month, as opposed to around £1,800 on the private market in Hackney.

We applaud this as a step in the right direction, **but would urge you to avoid referring to this as a 'living rent'.** It is still incredibly expensive for many people, and most importantly, **it sounds like the Living Wage, something we in Hackney campaign for.**

Please take into account that if a Living Wage in London is £10.20 an hour (approx. £1,401.00 a month based on a 37.5 hour week with tax deductions) then it cannot follow that a Living Rent is £1,000. This would leave only £401.00 a month for food, bills, travel, clothes, phone, internet and any form of entertainment.

There is nothing affordable about spending two thirds of your income on rent and it is certainly not living, or not in a civilised way. Shelter suggests that to be affordable, an individual's rent should take up a maximum of 35% of their income, and clearly the poorer you are and the more dependants you have, the smaller the percentage you can afford give up without suffering.

The terms 'living' and 'affordable', whether utilised by you or by the Tories, inevitably become tainted because they are very subjective. Arguably names have to be coined to distinguish between the various schemes, but isn't it better just to say what things cost? **To describe them as 'living' or 'affordable' will alienate the (many) people who still simply cannot afford them,** particularly if a 'Living' rent does not align with a 'Living' wage**. Please take the lead and simply state the price of homes, allowing Londoners to judge affordability for themselves.** The Labour Party doesn't have to participate in Tory Newspeak.

User: Ms Patricia Quigley

We welcome your call on the Government to free up Councils to build more and for removal of the Housing Revenue Account borrowing caps. The type of housing that the majority would benefit from is not-for-profit, properly regulated, council housing and you should be clear about that in the face of Tory and media 'sink estate/benefit scrounger' rhetoric. However, unless planning law which favours big developers is reversed, it will remain difficult for Councils to achieve the ideal of many well maintained council homes. The law was changed in 2012 to say that developers must make 'competitive returns' (in practice, a profit of at least 20 %). This has been used to justify developers failing to provide the requested number of 'affordable' homes, and it is likely that this practice will continue, particularly if you do not ban cash in lieu contributions. **It is not enough for your Plan simply to state:**

Cash in lieu contributions should be used in even more limited circumstances[45], and only where there is detailed evidence to demonstrate that on-site affordable housing delivery is not practical, off-site options have been explored but are not acceptable and that accepting a cash in lieu contribution will not be detrimental to the delivery of mixed and inclusive communities.

If we are serious about building homes the majority can afford to live in, then we must completely end the practice of accepting cash in lieu of 'affordable' housing. Cash in lieu is unhelpful, as local authorities then have to identify yet another site on which to build housing. As your plan asserts, we lack space in London and we currently have a situation where working class and even middle class people are being pushed out, as developers insist that they cannot house the poor in central London, so they are driven further and further out of the city.

The London Plan calls for empty space to be used for housing, but if it is merely more housing that the majority cannot afford then it will be a scandalous land-grab that infringes on current residents' recreational space with few benefits except profit for developers and sub-contractors. We urge you to go further and set the 'affordable' percentage at a minimum of 65% in new developments, which is what you yourself declare the London Strategic Housing Market Assessment says we need. Instead you have called for a woeful 35% on private land (subject to review in 2021) and 50% on public land.

The sentiment in the plan appears to support more genuinely affordable housing, but it is not supported by radical policy change. We cautiously welcome fast-tracking as an incentive for developers whose plans meet the minimum levels of affordable housing, however we despair at the continued use of 'viability' assessments as an option to justify building less or no cheaper housing. **Please remove statements such as 4.5.3 (set out below) which will allow developers to continue to renege on their obligations:**

Only where there are clear barriers to delivery and it is fully justified through detailed viability evidence, in line with the methodology and assumptions set out in Policy H6 Threshold approach to applications and the Mayor's Affordable Housing and Viability SPG, should a lower level of affordable housing be considered.

Whilst you cannot change the law, the removal of this clause would send a far clearer message to developers and help ensure that Londoners get some value from developments. If developers cannot afford to include a decent proportion of the housing Londoners actually need, then they must not build and we must not make it easy for them to do so.

Finally, all of this hard work to build homes is undermined if we do not repeal the right to buy scheme, as we will continue to lose much needed council stock. **Council housing has not been built en masse for forty years or more and since 1980 we in Hackney have lost a quarter of our council housing, whilst 13,000 people languish on the council housing waiting list.** Scotland and Wales have recently announced plans to stop right to buy and we urge you to do come out in support of the same. Reforms will not solve the situation; the most frequently proposed reform is decreasing the discount available, making it less likely that a poor person could afford to buy under the scheme. **Right to buy must end as a matter of Labour principle and for the collective good, so please take the opportunity presented by the publication of your London Plan and make a public stand on this issue.**

User:	Sir Simon Hughes

I support a 50% affordable housing strategy for each development, unless an equivalent amount of affordable housing is provided in the borough within the same postal district.

User:	Sir Simon Hughes
The definition of affordable should relate to the average London wage.	

User: Mr Drew Stevenson

I am aware that, in the consultation meetings held to discuss the draft LP, there have been criticisms made of the affordable housing policy by community groups - mostly because the strategic target for affordable housing is 50%, which has been set below the identified need (65%) and secondly because the definition of affordable means that “affordable”is not affordable to most people.

Whilst I am sympathetic to the target issue, bearing in mind that the overall target for housing delivery will have to “approximately double compared to current average completion rates” I am also sympathetic to the figures in the draft, **provided that** there is a clear commitment to their review within 2 years maximum, from the date of the Plan’s approval.

There is one strengthening of Policy that I would suggest however. I think it is likely that some objectors to the draft Plan will argue that, post Brexit, inward migration will fall and that the Plan therefore overstates the total need for additional housing, including affordable housing.

*****I therefore suggest that** the Plan contains a sentence (in Para 4.1.1?) to the effect that whilst the effects of any form of Brexit on migration specifically into London are currently unclear, the natural increase in London’s existing population, combined with outstanding demand, overcrowding and substandard accommodation, require a net addition of stock of at least the target in the draft Plan for the medium term in any event. If that were to change, the new situation would be tackled through the Plan, Monitor, Review process with due consultation etc. The current figures will therefore be relied on until such a Review.

On the issue of the definition of affordable housing, I note the the definition is consistent with the NPPF 2012 definition and that, within that, the Mayor has set out his preferred tenures. I am not sure that any deviation would be possible and that would stand up to appeal.

*****I suggest that** the Inspector examines this.

User:	Mr Drew Stevenson
***I suggest that** an additional policy H5C be added saying “All affordable housing must be secured in perpetuity.”	

User: Andrea Carey Fuller

We are concerned that the Mayor set policy first, in election promises (of 50% ‘affordable housing’) rather than using evidence to inform policy and to then negotiate with Government around the funding required to address London’s housing need.

We are concerned that the SHMA identifies households that can afford market rents, but who want to eventually buy a home, as having a need for intermediate housing. This is a departure from the way that SHMAs have been carried out in the past. It significantly contrasts with situations in which households that can only genuinely afford social-rented homes, yet are housed in private-rented homes that they will never be able to afford without the support of housing benefit, but are not deemed to need social rented homes. This treats lower income households with inequality. It results in a higher target for intermediate housing than would previously have been assessed. We note, in addition, that the backlog of need for intermediate housing has fallen considerably since the 2013 SHMA was carried out - from 45,705 to just 4,056. The backlog of need for social rented housing however is now 40 times that of intermediate housing, having more than doubled since 2013.

We question the SHMA’s departure from usual practice. We note that Bert Provan, Occasional Senior Research Fellow at the Centre for Analysis of Social Exclusion at the LSE and who worked for many years as a Senior Civil Servant in the DWP and DCLG, assessed quite recently (using DCLG data)[1] that nationally only one in five households that benefit from help to buy schemes (such as shared ownership) have incomes below the median. He also highlights that for three out of five households it simply helped them to buy sooner – but would inevitably have bought.

The big question in terms of Policy H5 is ‘affordable to who? So-called ‘affordable’ housing covers housing that a wide range of households with incomes can access from less than £12,000 a year (we note that the average social housing income is on average £17,500 a year) to households earning £90,000 and who are in the top 15% of households in London. ‘Affordable’ housing is thus a subjective term. Sub-market housing is a more accurate description for such a wide variety of tenures.

Most types of ‘affordable housing’ do not meet the needs of households with below median income levels. Policy H5 fails to address this. It sets a target for only 15% of homes delivered to be social rented and leaves boroughs to determine whether there may be any additional. The likelihood is that in attempts to deliver 50% affordable housing, boroughs will choose to deliver intermediate housing as more can be delivered for the same cost.

The Mayor should set a strategic London-wide target as has occurred in previous London Plans, in order that London-wide need might be delivered.

We propose:

- The title of policy H5 be renamed, more accurately, ‘sub-market housing’.
- The policy should refer by name to the different types of sub-market housing.
- Targets should be set that address the need identified in the SHMA but reverting to the previous way of assessing need for intermediate housing (that is for households not able to meet the cost of market homes – including private renting).
- This should be 65% sub-market housing, comprising 50% social / low cost rented homes and 15% intermediate. It should be noted that 30,973 social / low-cost rented homes need to be delivered annually over the next 25 years in order to deal with existing and backlog of need. Delivery of less than will continue to increase the backlog of need and increase the number of years that it will take to address the backlog. It should say that if the backlog of need were to be addressed over a 10-year period the social housing target would need to be 62% (of all homes) or higher.
- The Mayor should renegotiate with the Government around the use of all affordable housing grant to enable it in total to be used to deliver social-rented homes.
- The Mayor should require that all section 106 to be used to deliver social-housing.
- Intermediate housing should be delivered without affordable housing grant.

[1] http://blogs.lse.ac.uk/politicsandpolicy/how-help-to-buy-helps-the-privileged/

User:	Mill Hill Neighbourhood Forum

We are pleased to see your better definitions of what could really be affordable housing!
We think it should be possible for key workers and those in service-industries to live in the areas
where they work such that they feel a key part of the community they work with. We have seen too many planning applications where developers have tried to fudge the “affordable” issue. The viability statements for developments need far closer scrutiny.

User:	Kent County Council

KCC seeks assurance that the draft London Plan will provide the required range and mix of private and affordable housing within the boundaries of London. London boroughs should be required to deliver social housing/temporary accommodation within a reasonable vicinity of their area, rather than looking at significant relocations into Kent, which places additional strains on resources and on already stretched public services in the County. Where any “exceptional circumstances” are identified (Policy H5), and if the delivery of affordable homes is likely to have an impact on Kent, KCC would expect early engagement from the London Borough with ourselves and the relevant district / city authority. This should ensure that the required infrastructure is in place beforehand to meet the needs of the new residents, with sufficient investment secured as required.

User: Labour Party Victoria Branch

We acknowledge that the term 'affordable' is a Government coined legal term, but **as our Labour Mayor you should lead the way in rejecting Conservative rhetoric, which stops us looking at the reality of high cost living in a low wage economy.** What is affordable is subjective. We think you appreciate that 80% of market rate, defined by the Government as affordable, is quite clearly UNaffordable for many in need of a home, particularly in Hackney, where the average wage is 33k.

It is heartening to see that within your draft plan some homes will be provided at a reduced (from market rent) rate. This has been referred to as a **'Living Rent' within your 'Genuinely Affordable' campaign**, where you state that the average cost of a two bedroom flat is around £1,000 a month, as opposed to around £1,800 on the private market in Hackney.

We applaud this as a step in the right direction, **but would urge you to avoid referring to this as a 'living rent'.** It is still incredibly expensive for many people, and most importantly, **it sounds like the Living Wage, something we in Hackney campaign for.**

Please take into account that if a Living Wage in London is £10.20 an hour (approx. £1,401.00 a month based on a 37.5 hour week with tax deductions) then it cannot follow that a Living Rent is £1,000. This would leave only £401.00 a month for food, bills, travel, clothes, phone, internet and any form of entertainment.

There is nothing affordable about spending two thirds of your income on rent and it is certainly not living, or not in a civilised way. Shelter suggests that to be affordable, an individual's rent should take up a maximum of 35% of their income, and clearly the poorer you are and the more dependants you have, the smaller the percentage you can afford give up without suffering.

The terms 'living' and 'affordable', whether utilised by you or by the Conservatives, inevitably become tainted because they are subjective. Arguably names have to be coined to distinguish between the various schemes, but isn't it better just to say what things cost? To describe them as 'living' or 'affordable' will alienate the (many) people who still simply cannot afford them, particularly if a 'Living' rent does not align with a 'Living' wage**. Please take the lead and simply state the price of homes, allowing Londoners to judge affordability for themselves.** The Labour Party doesn't have to participate in Tory Newspeak.

We are working hard to promote Labour and to change the current government so progressive Labour housing policies can be introduced. Like you, we want to see decent housing for everyone, but we need to speak clearly about our vision when we meet people on the doorstep.

That means avoiding ambiguous jargon which is tainted by a failing housing market. Please revise these terms in your document, so we can engage in a plain-speaking discourse which will do far more to persuade the public to buy into our vision.

User:	YMCA

OPPORTUNITY TO COLLABORATE ON HOUSING

We believe affordability should be extended to a whole-life experience (eg. childcare, transport) and that housing is a social (not individual challenge).

Therefore, potential for new assets (housing typologies, platforms) that encourage whole-life affordability for whole neighbourhoods

User: South East England Councils

iv) The Plan refers to London’s housing delivery not keeping pace with planning approvals, highlighting an unbuilt pipeline of 274,000 homes, which could hinder delivery of the Mayor’s growth aims. The Plan also aims for 50% of all new homes to be ‘truly affordable’ (Policy GG4 & H5). Delivery of approved market and affordable homes and supporting infrastructure is a shared challenge in the South East, holding back local growth plans.

? SEEC welcomes ongoing joint working with the Mayor to press Government for changes that would help address our shared challenges of unimplemented planning permissions and barriers to housing delivery. We would like to see the Plan specify the Mayor’s commitment to working in partnership with SEEC to help London and its neighbours overcome particular barriers to delivering market and affordable homes, such as: local discretionary powers to incentivise delivery (eg. charging council tax on unimplemented permissions); funding powers/freedoms for us to deliver more affordable homes (eg. lifting the HRA cap for all councils) and supporting infrastructure (eg. local retention of stamp duty).

User: L&Q

Expectation for grant

Policy H5 currently identifies a specific measure to achieve the strategic target for the delivery of 50% affordable housing as: ‘2) using grant to increase affordable housing delivery beyond the level that would otherwise be provided’

This clause should be removed. Applications for planning permission should be determined based on their ability to provide affordable housing, without reference to grant funding. Firstly, introducing this into the decision-making process is in conflict with planning law and policy and secondly it introduces unnecessary delays to decisions being made. There is no reason why additional funding cannot be introduced into a scheme postpermission and so raise the level of affordable housing provided on site beyond what was stipulated in the decision itself. In practice, the London Plan monitors actual delivery of affordable housing rather than planning permissions granted. As such, the emphasis should be on expediting delivery and not on the availability or otherwise of grant funding.

User: L&Q

Differentiating between applicants

Policy H5 currently identifies the following specific measures to achieve the strategic target for the delivery of 50% affordable housing as: ‘3) affordable housing providers with agreements with the Mayor delivering at least 50 per cent affordable housing across their portfolio… 5) strategic partners with agreements with the Mayor aiming to deliver at least 60 per cent affordable housing across their portfolio’

Planning law does not support any approach in which different standards are applied for different applicants. Development plan policy must be revisited so that Registered Providers compete on a level playing field with other homebuilders.

User: L&Q

Delivery at public sector land

‘4) public sector land delivering at least 50 per cent affordable housing across its portfolio’

It is unclear what ‘its portfolio’ refers to. Again, planning law does not support any approach in which different standards are applied for different applicants. This approach must also be considered in terms of the legal requirement of public bodies to achieve ‘best value’, as well as in terms of other viability considerations such as the cost of bringing such land into use.

User: National Custom and Self Build Association

Policy H5 Delivering affordable housing

NaCSBA proposes that recognition be given to the role custom and self build can make in delivering genuinely affordable homes for London and help those willing to commit their time, skills (or to learn new skills) to reduce the cost of meeting their housing needs. This can include community led housing projects and group self build.

NaCSBA's Right to Build Tool Kit identifies a number of different models in the UK and overseas that give those in housing need the opportunity to influence the design of their home and to reduce rental or purchase costs by contributing their DIY labour in the construction of the home, in particular through self finish schemes. The commitment of 'sweat equity' can be harnessed to contribute towards a deposit on a shared ownership self finish property.

Local planning authorities can combine their duties to deliver serviced plots to meet demand on right to build registers, through the delivery of affordable custom and self build homes.

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Local planning authorities can combine their duties to deliver serviced plots to meet demand on right to build registers, through the delivery of affordable custom and self build homes.

User: L&Q

Purpose of Planning Policy

The adopted London Plan defines its policies into categories including ‘Strategic’ and ‘Planning decisions’. Draft London Plan policies H5-H8 should accordingly be categorised as follows:

? Strategic policies: H5 Delivering affordable housing.

? Planning decisions: H6 Threshold approach to planning applications; H7 Affordable housing tenure; H8 Monitoring of affordable housing. Emphasising this distinction will both help advise decision-makers and support the pursuit of the London Plan’s objectives, as set out below. Focusing on Delivery: Monitoring Targets The adopted London Plan Key Performance Indicators address housing completions rather than planning permissions. The same approach should be applied in the new London Plan. The Key Performance Indicator under Table 12.1 that reads ‘supply of affordable homes’ ought to read ‘delivery of affordable housing’. The relevant monitoring measure should likewise not be the ‘positive trend in percentage of planning approvals for housing that are affordable housing (based on a rolling average)’ but the trend with respect to homes that are delivered. Delivery Across an Affordable Housing Providers’ Programme Planning law does not support any approach in which different standards are applied for different applicants at the application stage. Affordable housing providers (e.g. Housing Associations) should not be asked to make commitments that are not required of other applicants. This point is relevant because:

? Strategic Targets for Affordable Housing Providers - Policy H5 sets a strategic target for the delivery of 50% of homes across London to be affordable homes. The policy explicitly seeks affordable housing providers with agreements with the Mayor to deliver 50% across their portfolio. ‘Strategic partners’ are expected to aim to achieve 60%. A fundamental point is that this is a strategic objective.

? Reference to Affordable Housing Policy at the Planning Application Stage - Policy H6 sets targets for ratios of affordable housing to be delivered from different types of sites in order for an applicant to qualify for the Fast Track Route. It does not differentiate based on who the applicant is.

Put another way, an affordable housing provider is not expected under the draft London Plan to achieve different levels of affordable housing delivery than other applicants on a site-by-site basis. This should be explicitly set out in the supporting text to Policy H5 so that there is no confusion on this point.

Making Use of Grant Funding Grant

funding makes a fundamental contribution towards achieving strategic targets through increasing the number and affordability of affordable homes that can be delivered across a home builders' portfolio. In practice, grant funding is often invested post-permission. This means the number of affordable homes realised at a site may exceed the minimum number/ratio specified in the original planning permission. At a strategic level, the delivery rates for affordable housing may outstrip what was approved under the relevant original planning permissions. Grant funding should be invested to deliver the best outcomes across a home builders' portfolio (e.g. matching a mix of home sizes and tenure types where this delivery can best address need). Home builders and funders will always prefer this flexibility. Given the above, the draft London Plan should be revised so that commitments regarding the investment of grant funding are not sought at the planning application stage. Seeking grant to be incorporated at the application stage is detrimental to the delivery of the Plan's objectives as it:

? limits flexibility for home builders and funders to deliver the best outcomes across their portfolios and therefore optimise the cross-subsidisation between schemes and maximise the delivery of affordable housing across London;

? is not useful, as the fundamental objective of planning policy is to secure the delivery of affordable homes rather than a number/ratio of homes specified by planning permission; and

? will (as is already being demonstrated in practice) delay decision-making and thus the actual delivery of new homes.

Affordability of Intermediate Homes

The draft London Plan identifies income caps and other thresholds for affordable housing tenures. This has included reducing household income of intermediate rent products to households with combined incomes of £60,000 or less. The median dual income of two Londoners in full-time work is £66,116 (according to figures downloaded from Nomis on 12 February 2018). The income cap of £60,000 therefore excludes a significant proportion of households, many of whom are key workers, from accessing intermediate rented homes. This drop from the previous £90,000 threshold to £60,000 means half a million of London's households are no longer eligible for intermediate rented housing. Whilst the income thresholds for shared ownership housing remains at £90,000, this does not mean all households excluding from accessing

intermediate rent will instead access shared ownership housing. Reasons for this include:

? not all households excluded from renting are however at a stage in their life where they wish to purchase a home.

? not all households want to own a home at all; and

? not all households will have the financial means to purchase a shared ownership home. On the latter point, not every household currently earning £60-90,000 can buy an appropriate home via shared ownership. This may be because of income multipliers required by mortgage providers. When such households find themselves excluded from intermediate rented properties, their housing costs increase and it is yet harder to save for the deposit they may require for the shared ownership property. The reduction in the income thresholds for intermediate rent therefore excludes some Londoners from accessing appropriate homes. They may accordingly find they need to relocate further from family, friends and their place of work. They may relocate out of London. On this basis there is a firm case to restore the intermediate rent income cap to £90,000. For similar reasons there is a firm case to maintain the shared ownership income cap at £90,000.

User: Highams Park Planning Group

POLICY HDA1: Housing Types & Affordability

Development in Highams Park shall provide a range of locally specific housing appropriate for all sections of the community, including affordable housing.

Residential development shall meet the local need for particular home types:

i. In HPDC apartments suitable for downsizing older households and younger, locally-connected first-time buyers shall be supported.

ii. Family housing outside HPDC will be welcomed and should be comprised principally of three and four bedroom houses with gardens suitable for families.

iii. 50% of all new homes built as part of any development of more than 3 homes should be "affordable". Where this is not provided a Viability Assessment shall accompany the submission.

iv. Affordable housing provided as part of any development within the Area should be occupied in the first instance by people who have strong local connections and can demonstrate that they have satisfied at least one of the following criteria:

? lived in the Area for a minimum of two years
? worked in the Area for a minimum of four years
? have immediate family (grandparent, parent, child or sibling) who have lived in the Area for a minimum of six years

v. Applications for development of Self-build or Custom-build homes shall be supported.

Local property values have risen sharply in recent years and well above the rate of increase in construction costs (see Annex 3 - Appendix 2). This increased margin allows all local affordable housing and other social and environmental policies to be applicable to all developments, including smaller developments with their associated small-development cost premium.

User: dp9

Policy H5 – Delivering affordable housing

Whilst we support the ambition to provide more affordable housing, delivery will only occur if development is viable. Replacing the current maximum reasonable approach with numerical targets which provide less flexibility to respond to site-specific or economic challenges is likely to result in fewer affordable homes being delivered, not more, even if the headline percentages being granted planning permission are higher. We would also request that Part A is clarified so that it does not refer to mixed-use developments that provide no new housing, and to clarify that the affordable housing requirements only apply to net additional new housing.

RECOMMENDATION: Amend Part A to require the maximum reasonable amount of affordable housing, and to refer to ‘developments that include net additional new housing’, in place of the terms ‘residential and mixed use developments’.

User: Aitch Group

Affordable Housing

The draft London Plan sets a requirement of 50% affordable housing on Industrial Land, where it is to be released. This figure is significantly above current delivery levels and very challenging in the context of relatively low residential values, pressing infrastructure needs and high remediation costs.

This figure would be extremely challenging for many schemes in Bexley due to viability issues. Low land values and high build costs combined with the need to provide other essential social infrastructure on site, means there is little choice for the Borough but to accept lower levels of provision or defer contributions until later phases in the expectation of capturing subsequent uplifts in value.

In Bexley, the value of land in industrial use in some areas can be equivalent to land in residential use, making a 50% requirement for affordable housing unachievable. The requirement for affordable housing on industrial land should be determined by the Local Planning Authority, understanding local circumstances to ensure this does not become a trigger to stall housing delivery.

User: London and Continental Railways

Draft Policy H5 sets out a strategic target for 50% of new homes to be affordable. Draft Policy H6 expands on this, with a threshold approach to be applied to planning applications for development proposals delivering more than ten units, or a combined floorspace greater than 1,000sqm. This approach sets a level of affordable housing of 35% affordable housing, increasing to 50% on public sector land, Strategic Industrial Locations, Locally Significant Industrial Sites and other industrial sites deemed appropriate to release for other uses. In order to follow the ‘fast track route’ for applications under the threshold approach, applications must satisfy the following criteria:

1 Meet/exceed the relevant threshold of affordable housing on-site without public subsidy;

2 Be consistent with the relevant tenure split (in accordance with draft Policy H7);

3 Meet other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor where relevant;

4 Demonstrate that account has been taken of the strategic 50% target and a grant has been sought where required to increase the level of affordable housing beyond 35%.

In the case of the delivery of a scheme (either as a phase of a masterplan or a single-phase development) comprising two or more land parcels with a mix of public and private ownership, draft Policy H6 itself, nor the reasoned justification for the draft policy and for Policy H5, currently clarify how the affordable housing ‘fast track’ route would be implemented in the case of more complex sites. It is not at all clear how, when public and private land parcels are combined and brought forward together as a comprehensive site and development scheme across land ownership boundaries, this threshold approach would apply; i.e. would the development be required in part to provide 35% and in part 50%, or would a site-wide ‘average’ be applied and how would this be calculated and then assessed by the GLA etc.?

User: Elephant Amenity Network

H5 Delivering affordable homes

5.1 We are concerned that the Mayor set policy first, in election promises (of 50% ‘affordable housing’) rather than using evidence to inform policy and to then negotiate with Government around the funding required to address London’s housing need.

5.2 We are concerned that the SHMA identifies households that can afford market rents, but who want to eventually buy a home, as having a need for intermediate housing. This is a departure from the way that SHMAs have been carried out in the past. It significantly contrasts with situations in which households that can only genuinely afford social-rented homes, yet are housed in private-rented homes that they will never be able to afford without the support of housing benefit, but are not deemed to need social rented homes. This treats lower income households with inequality. It results in a higher target for intermediate housing than would previously have been assessed. We note, in addition, that the backlog of need for intermediate housing has fallen considerably since the 2013 SHMA was carried out - from 45,705 to just 4,056. The backlog of need for social rented housing however is now 40 times that of intermediate housing, having more than doubled since 2013.

5.2 We question the SHMA’s departure from usual practice. We note that Bert Provan, Occasional Senior Research Fellow at the Centre for Analysis of Social Exclusion at the LSE and who worked for many years as a Senior Civil Servant in the DWP and DCLG, assessed quite recently (using DCLG data) that nationally only one in five households that benefit from help to buy schemes (such as shared ownership) have incomes below the median. He also highlights that for three out of five households it simply helped them to buy sooner – but would inevitably have bought.

5.3 The big question in terms of Policy H5 is ‘affordable to who? So-called ‘affordable’ housing covers housing that a wide range of households with incomes can access from less than £12,000 a year (we note that the average social housing income is on average £17,500 a year) to households earning £90,000 and who are in the top 15% of households in London. ‘Affordable’ housing is thus a subjective term. Sub-market housing is a more accurate description for such a wide variety of tenures.

5.4 Most types of ‘affordable housing’ do not meet the needs of households with below median income levels. Policy H5 fails to address this. It sets a target for only 15% of homes delivered to be social rented and leaves boroughs to determine whether there may be any additional. The likelihood is that in attempts to deliver 50% affordable housing, boroughs will choose to deliver intermediate housing as more can be

delivered for the same cost.

5.5 The Mayor should set a strategic London-wide target as has occurred in previous London Plans, in order that London-wide need might be delivered.

5.6 We propose:
• The title of policy H5 be renamed, more accurately, ‘sub-market housing’.
• The policy should refer by name to the different types of sub-market housing.
• Targets should be set that address the need identified in the SHMA but reverting to the previous way of assessing need for intermediate housing (that is for households not able to meet the cost of market homes – including private renting).
• This should be 65% sub-market housing, comprising 50% social / low cost rented homes and 15% intermediate. It should be noted that 30,973 social / low-cost rented homes need to be delivered annually over the next 25 years in order to deal with existing and backlog of need. Delivery of less than will continue to increase the backlog of need and increase the number of years that it will take to address the backlog. It should say that if the backlog of need were to be addressed over a 10-year period the social housing target would need to be 62% (of all homes) or higher.
• The Mayor should renegotiate with the Government around the use of all affordable housing grant to enable it in total to be used to deliver social-rented homes.
• The Mayor should require that all section 106 to be used to deliver social-housing.
• Intermediate housing should be delivered without affordable housing grant.

User: Solum

Viability

Solum makes the following comments with regard to viability:

1. Solum supports the delivery of affordable housing and the expectation that all development proposals should maximise the delivery of affordable housing;

2. The development of operational rail land, including car parks, is complex, time consuming and costly and in most cases it is expected that it will not be possible to deliver 50% affordable housing. Therefore, in the majority of scenarios, planning applications will be required to follow the viability tested route;

3. In order to create certainty and speed up viability negotiations, the Draft London Plan should recognise that existing rail-related assets are a particular asset class with unique costs and challenges to be taken into consideration. The current Draft London Plan will constrain the development of Solum's land assets and prevent the delivery of homes unless the particular difficulties associated with the development of these sites can be recognised.

Solum supports the delivery of affordable housing and the expectation that all development proposals should maximise the delivery of affordable housing. However, they have some fundamental concerns regarding the Mayor's threshold approach to viability, initially detailed in the Mayors Affordable Housing and Viability SPG, which applies a 'one size fits all' to development of public land in London. In particular this approach does not take into account the distinct challenges related to the development of rail related sites.

User:	Mr Chris Lloyd-Williams

I would like to see foreign property investors excluded from purchasing property they do not occupy. Allowing this practice is what is causing local people to fail to be able to afford property where they work and having a significant and negative impact on the housing market in general.

User: Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living

H5 (161) - Delivering Affordable Housing

If the Mayor is serious about increasing the overall supply of retirement housing, then an exemption from this policy is required for specialist housing for older people. We submit that this policy is discriminatory, given the unequal effects it has on the ability of elderly people to gain access to appropriate accommodation. Late Review makes most of the schemes we, as a group, are seeking to bring forward in London very much riskier in financial terms to the point that they are currently stalled.

It is considered that the GLA view off-site delivery by retirement housing to be their ‘choice’. The evidence presented by the Mayor to justify this statement is considered to be fundamentally flawed. The reality of the situation is that it is impracticable to provide affordable housing on typical older people’s housing sites in a London context. There are valid reasons for this including management costs, affordability and site design constraints making it impossible to accommodate separate management arrangements on often small constrained previously developed sites.

Paragraph 4.5.2 demonstrates how the threshold policy was introduced through SPG in advance of the policy through the DLP. The Mayor has therefore introduced policy early through SPG which is contrary to national guidance and unlawful. We have jointly submitted a legal challenge to this effect.

The supporting text of the DLP further demonstrates how the Mayor fails to comprehend the impact the application of this policy has on housing proposals for older people. Again, we have jointly submitted a legal challenge to this effect.

In line with national policy, review mechanisms on single phase proposals should not be promoted as this increases the risk that such proposals will not come forward.

Objection: This policy is not positively prepared. The approach detailed has not been found to be viable for older persons' accommodation and is neither justified nor effective. We also consider the policy to be inconsistent with national planning policy as it is overly prescriptive for a strategic document. We respectfully request that it should be amended or removed.

User:	Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living

Currently, the retirement sector overwhelmingly agrees with almost all Local Planning Authorities that, where viable, off site contributions in the form of financial contributions are the best solution to addressing housing need.

Paragraph 4.5.6 of the DLP sets out that in respect of cash in lieu contributions, these should be accepted “in even more limited circumstances”. Once again, the DLP appears to promote retirement housing provision on one hand and then misunderstand how it can be viably provided in terms of other DLP policy.

User: Urbanissta

Policy H5 Delivering Affordable Housing

Policy H5 sets a strategic target of 50% affordable homes to be delivered across London.

Comment: Many sites will struggle to meet the 50% affordable housing target for Council owned land. The viability assessment for any site that is unable to meet will delay the approval of housing schemes and thereby acerbate the affordability crisis.

User: London Borough of Camden

The Council supports most elements of Policy H5, including the strategic 50% target for affordable housing, the threshold approach to viability testing and the general requirement for on-site delivery. However, we have some concerns in relation to more detailed aspects of Policy H5.

We support the principle set out in Criterion A(4) that public sector land should deliver at least 50% affordable housing, but propose that additional flexibility should be added to the criterion or supporting paragraphs acknowledging that a lower proportion may be appropriate where other significant public benefits being delivered (e.g. community investments such as schools and community centres).

Camden has introduced its Community Investment Programme (or CIP) in response to severe cuts in government capital funding, and the need for significant investment in schools, community facilities and the Council's housing stock. The programme generates investment that would not otherwise be available by ensuring that the Council makes the best use of its property assets, refurbishing or regenerating some sites and selling other sites where they are underused, surplus to requirements, no longer suitable to meet contemporary needs or too expensive to maintain.

CIP involves investment in schools, community facilities, and refurbishing and replacing homes. The scale and scope of the programme means that it is necessary to include a substantial component of new homes for sale as well as new affordable homes. Across the programme, the Council is building 3,050 new homes in total, including 650 replacement council rented homes, 450 new council rented homes, and 300 new homes for Camden Living Rent (homes for residents who cannot afford market rent, but are ineligible for social housing). We are also building 1,650 homes for sale to fund the affordable homes, schools and community facilities.

Examples of CIP schemes that are primarily delivering new or improved community facilities include:

Scheme	**Existing uses**	**Proposed uses**	**Status**
Netley Primary School, 30 William Rd, NW1 2012/2089/P	Primary and nursery school; educational campus (autism spectrum disorder unit, community learning centre, primary pupil referral unit; primary learning support services, ancillary house for caretaker);	Redevelopment for: part replaced/ part refurbished school and educational campus (including all existing facilities and site manager’s flat); 70 market homes (now to be used for HS2 replacement homes); and 10 affordable homes (social rent).	Completed 2014/15

Scheme	Existing uses	Proposed uses	Status
1-30 Camden Street and 67-72 Plender Street NW1 2013/1969/P	Community centre, sports pitch, changing rooms, single storey shops and garages	Redevelopment for: improved community centre and changing rooms; new open space; replacement shops; 31 market homes; and 14 affordable homes (10 social rent, 4 intermediate).	Completed 2017/18
1-33 Liddell Road NW6 2014/7649/P 2014/7651/P	32 one-storey light industrial units B1c	Redevelopment for: new primary school buildings (Kingsgate Primary Lower School); new public space; mixed work spaces B1a-c (larger total floor area than existing units); 102 market homes; and 4 affordable homes (social rent).	Under construction, school building completed 2017/18
Highgate Newtown Community Centre, 25 Bertram Street N19 2016/6088/P	Community centre, 1 ancillary house for caretaker (vacant), 2 leasehold flats	Redevelopment for: improved community centre (27% more floor area); and 31 market homes.	Permitted June 2017

The Council also proposes that Policies H5 and H10 (or their supporting paragraphs) should be amended to clarify the relationship between them. On the basis of Policy H5 Criterion A(4), a 50% affordable housing target would apply to estate regeneration on Council-owned land. However, Policy H10 sets less demanding targets, with Criterion B indicating that where loss of existing affordable housing is proposed this should generally involve an uplift in affordable housing provision (presumably this is referring to demolition and replacement), and Criterion C indicating that the delivery of additional affordable housing should be maximised.

The Council considers estate regeneration schemes should be assessed on the basis of Policy H10 rather than Policy H5 Criterion A(4), and that this should be stated in association with each of the two policies. When considering individual estate regeneration schemes or larger regeneration programmes on public land, it will rarely be possible to deliver 50% of affordable housing. What can be achieved will depend on the tenure of existing homes on the site, and whether they need to be replaced or refurbished. There may be cases where a large number of affordable homes need to be replaced, and the introduction of a high percentage of market homes is needed to fund the scheme and create a mixed and inclusive community. There may also be cases where a large number of leasehold homes need to be replaced at a cost the

residents can afford, and this reduces the ability of the scheme to generate additional affordable housing. We consider that the paragraphs supporting Policy H5 should acknowledge such constraints on estate regeneration schemes.

With respect to Criterion A, and particularly Criterion A(4), the Council considers that the London Plan should clarify whether the affordable housing targets relate to net additional housing, or the overall number of homes, including replacement homes. As stated above, the Council does not consider that the 50% affordable housing target in Criterion A(4) should apply to estate regeneration schemes. However, if the target is applied, the potential for estate regeneration schemes to achieve 50% affordable housing will be greater if overall housing delivery is considered, and the replacement affordable homes are included within the 50%.

We note that Criterion B indicates that an off-site contribution to affordable housing or a payment in lieu of affordable housing should only be provided in exceptional circumstances. The Camden Local Plan 2017 (and its predecessors) have adopted an alternative cascade approach, where on-site provision is the usual approach, but off-site delivery may be acceptable where affordable housing cannot practically be provided on-site (e.g. for small schemes), or off-site provision would create a better affordable housing contribution (in terms quantity and/ or quality). The Local Plan regards a payment in lieu as the lowest tier of the cascade, and this tier (rather than off-site provision) is only accepted in exceptional circumstances.

We consider that Policy H5 Criterion B should be amended to adopt a similar cascade, giving greater flexibility for off-site delivery of affordable housing but maintaining the position that a payment in lieu should only be provided as an alternative in exceptional circumstances. This would be more consistent with the drafting of paragraphs 4.5.5 and 4.5.6, and more consistent with the advocacy of land use swaps, credits and off-site contributions through Policy SD5 and paragraph 2.5.8.

User:	London Borough of Sutton

SUPPORT. The London Borough of Sutton supports the provisions of Policy H4 and considers it is broadly consistent with the council's current approach of developing modular housing for council owned land.

The London Borough of Sutton considers that the supporting text of Policy H5 should clarify whether housing delivered from this source can count towards the housing target for the borough.

User: Battersea Project Land Company Limited

Policy H5 – Delivering affordable housing

Whilst we support the ambition to provide more affordable housing, delivery will only occur if development is viable. Replacing the current maximum reasonable approach with numerical targets which provide less flexibility to respond to site-specific or economic challenges is likely to result in fewer affordable homes being delivered, not more, even if the headline percentages being granted planning permission are higher. We would also request that Part A is clarified so that it does not refer to mixed-use developments that provide no new housing, and to clarify that the affordable housing requirements only apply to net additional new housing.

RECOMMENDATION: Amend Part A to require the maximum reasonable amount of affordable housing, and to refer to ‘developments that include net additional new housing’, in place of the terms ‘residential and mixed use developments’.

User: Tavistock and Portman NHS Foundation Trust

Draft Policy H5 – Delivering Affordable Housing

The Trust supports the Mayor's aims to boost the supply of housing and to deliver more affordable homes for Londoners. This draft policy notes that affordable housing should be provided on site in order to deliver communities which are inclusive and mixed by tenure and household income, providing choice to a range of Londoners.

As with our comments on other draft policies, we consider it important to highlight that affordable housing should not be sought at the cost of investment in important services, including healthcare, that are necessary to the successful functioning of London.

Where affordable housing is provided on surplus NHS land it should be aimed at, in the first instance (e.g. by way of a nominations agreement), healthcare staff and other NHS workers in line with the aims of the 2017 Naylor Review.

User: The Highbury Group

Housing targets

6. The proposed London-wide affordable housing target (in effect a target for sub-market housing at a range of ‘affordability’ levels) is not based on the evidence of the SHMA, which assesses the requirement over the 10-year period at 65% of the total requirement of 66,000 homes a year. As stated in para 1 above, we consider that both of these figures are underestimates. Government planning policy in the National Planning Policy Framework and subsequent detailed planning guidance, requires each Planning Authority to meet the full housing needs within its area. The targets in the plan should therefore be amended to be consistent with the SHMA. This also applies to the targets for different types of sub-market housing and to targets in relation to the bedroom size mix of new homes. The target for low cost rented housing should be 70% of the ‘affordable’ housing target, with the target for intermediate housing being 30% of the ‘affordable’ housing target. A target that at least 30% of new homes should have 3 or more bedrooms should also be set.
Delivering targets

7. The Plan or supporting documentation needs to demonstrate that the delivery mechanisms proposed will achieve the targets set. This is covered adequately in chapter 11 of the plan on funding. Previous London Plans have been supported by documentation demonstrating the delivery constraints and how these could be overcome. In this context, the policy in relation to a viability threshold of 35% is not consistent with the Mayor’s overall 50% affordable housing target, as the Plan fails to demonstrate how the deficit will be met on sites not covered by the threshold policy. This policy must therefore be amended as proposed below.
Defining affordability

8. The definitions of affordability for different types of sub-market housing products need to be related to the household incomes of the groups for whom the housing is to be provided. Such definitions were included in the original London Plan and are essential if schemes given planning consent are to achieve the objectives for which consent was granted. It is also important that intermediate housing provision is made for households across a range of income levels, and not just for those at the margins of access to homeownership. It is important that the compliance of development proposals in relation to these affordability targets are assessed on a consistent basis and the GLA’s viability assessment mechanisms need to be revised to incorporate this with full data to be published on the extent of policy compliance, with justifications for any non-compliance.

9. The requirement for improved monitoring and justifications for non-compliance also applies to the density policy, and the existing system

and key performance indicator for monitoring density of new schemes should be retained.

User: The Highbury Group

H5 Delivering affordable housing

A Amend 50% strategic target to 65%

A3) Amend 50% to 65%

A4) Amend 50% to 65%

A5) Amend 60% to 65%

Borough Affordable housing Targets: Reinsert policy 3.11B and 3.11C from existing London Plan

Explanatory note. This rebases the affordable housing targets on the evidence base as in the Strategic Housing Market Assessment. It also reinserts strategic guidance on the setting of affordable housing by boroughs in their local Plans which has been omitted from the plan draft. This reinsertion is critical as otherwise boroughs may set their own affordable housing targets too low, which would put at risk the delivery of the London-wide strategic target.

User: The Highbury Group

3. Affordable housing targets and application

The SHMA gives annual tenure requirements as:
23,037 market homes (35% of total)

11,869 intermediate homes (18% of total)

30,972 low cost rent homes (47% of total)

Taking the two sub market categories together gives an ‘affordable housing’ requirement of 65% of the total requirement.

As 78% of the backlog is for lower rented accommodation, meeting the backlog over a shorter timescale than 25 years, would increase the proportion of new homes in the plan period which should be low cost rented homes. There is a strong argument for giving priority to meeting the most acute needs, though this factor does not seem to be considered in the plan.

The affordable housing targets in the plan at policy H7 are:

Market 50%

Intermediate (London living rent and shared ownership) 15%

Low cost rent 15%

Affordable housing to be determined by borough 20%.

The disaggregation of affordable housing targets is taken from the Mayor’s Housing Strategy which was published in advance of the completion of the SHMA. The targets therefore appear to be related to the current affordable housing funding regime, rather than the assessment of housing requirements in the SHMA. The overall 50% affordable housing target falls short of the 65% requirement. The minimum target for social rented housing of 15% is far short of the estimated requirement of 47%, and even if all 33 local planning authorities

used all of the 20% discretionary element for low cost rent, the aggregate would at 35% still fall far short of the 47% requirement.

We argue that the targets in the plan should be based on the SHMA rather than on the current funding regime and as a strategic planning authority the Mayor should set London-wide targets rather than leave so much discretion to individual planning authorities - who will have little if any regard to needs presented outside their own authority's area.

The Plan has no policies on how individual boroughs should set affordable housing targets (and targets for different sub-categories of sub-market housing) within their Local Plans. There is no replacement for policy 3.11B, C and D in the 2015. This is a significant deficiency. The new approach to affordable housing focuses on assessment of individual development proposals with a focus on viability assessments rather than on assessment against London-wide or borough-wide targets. This approach would allow a borough either to drop any specific borough wide affordable housing target or to amend or reduce its current Plan targets.

The delivery of the 50% affordable housing target is problematic. In previous versions of the London Plan, policies have required each application referred to the Mayor to be assessed in relation to the London Plan target – 50% in the 2004 and 2008 Plans; 40% in the 2011 and 2016. Policy H6 in the new plan, following the recent GLA affordable housing and viability SPG, proposes that for private sector led schemes without grant, a 35% affordable housing output would be acceptable and such a scheme would be exempt from a viability assessment. Neither the policy nor SPG specify a minimum proportion of low cost rented housing within such a scheme. Policy H6B proposes a 50% affordable housing target on public sector land and a 50% target on sites, which are within Strategic Industrial Locations and Locally Significant Industrial sites. Other policies seek to protect industrial floorspace, so this assumes higher proportions of affordable on mixed use sites, with employment uses retained through intensification. There is an assumption that sites with Mayoral grant will provide at least 50% affordable housing, but again no minimum proportion for low cost rented housing. It is unclear how the aggregation of these different targets will be a London-wide affordable housing outturn of 50%. This could only be achieved if a significant proportion of grant funded schemes achieved affordable housing outputs of at least 65% - this seems unlikely given current funding regimes and limits on grant per home. Moreover, given both funding regimes and targets, the proportion of social rented homes will be far below the proportionate requirement of 47% of total net new supply identified in the SHMA and possibly below the minimum 15% target set.

User: Pocket Living

There is strong support for the Mayor's strategic target for 50% affordable housing which reflects Pocket's own ethos to provide more affordable homes for Londoners. Pocket aims to maximise the delivery of affordable housing and deliver well in ecxess of 50% affordable homes on our sites (particulary on public land). The Mayor should (and has) taken the lead on releasing public land especially to developers who will provide the highest provision of affordable housing.

Where public land is released for housing by public bodies, there should be a presumption in favour of permission for schemes which deliver significantly more than 50% affordable housing. The use of Permission in Principle and Brownfield Registers will assist in this regard and the persumption in favour could be built into the scheduling of sites.

On SIL and other industrial land where a scheme can deliver a substantially increased provision of affordable housing (above 75%) the need for co-location of industrial uses should be waived to encourage the delivery of affordable housing.

User:	Abigail Woodman

It is essential that housing in London is affordable for the people who live here, but the London Plan needs to be much bolder about how it makes this happen

User:	Abigail Woodman

All developments on council-owned land must contain 100% social housing. Public land must not be sold off to line the pockets of developers.

User: Pocket Living

CIL and Discretionary Social Housing Relief

Pocket would wish to see reference in the Draft London Plan (Policies H5 to H7) to an encouragement to London boroughs to utilise Discretionary Social Housing Relief (DSHR) to encourage more innovative affordable housing models to come forward. At present due to the wording of the CIL Regulations only social and affordable rented housing, intermediate rented housing and shared ownership housing benefit from mandatory SHR. Boroughs can utilise DSHR but they have to enact it and produce a statement that DSHR is available in a borough. At present only limited boroughs do so. This adds significant cost to developers such as Pocket providing other forms of genuinely affordable homes.

Pocket considers the Draft London Plan should include encouragement for London Boroughs to enact DSHR across London so as to encourage more affordable housing developments to happen and to encourage more innovative forms of affordable developers.

To this end Pocket believes the Mayor should shoe his encouragement for this be enacting DSHR on Mayoral CIL. This enactment will encourage and incentivise boroughs to do the same.

User:	Sara Chernaik
Developers should not be able to buy their way out of providing affordable housing.	

User: Federation of Enfield Residents & Allied Associations

1. **Affordable housing working against infrastructure;** affordable housing may have presentational appeal but its consequences are clear and substantial, even to reinforcing the conditions that make it hard for newcomers to enter the housing market. Affordability is not free, it is both a drain on market purchasers, who have to contribute towards subsidies for their neighbours, so actually serves to maintain market prices – the very opposite of stated policy. Help to Buy has had a far greater impact on opening the housing market and should be the key tool to promote home owning, leaving much more land development value available to LA's for infrastructure investment.
2. **Pressing need for social housing, managed flexibly**: Social housing is under represented in the London Plan, where we feel a target should be set for each borough, as a top priority, albeit to let to tenants on reviewable conditions: allowing families to earn or inherit rights to subsidised public housing is simply wrong in principle and denies the proper allocation of resources.

User: Pat Turnbull

Policy H5 Delivering affordable housing

Amend heading - remove 'affordable' – replace with 'which most Londoners can afford to live in and maintain a good life style'.

A The strategic target is for 50% of all new homes delivered across London to be affordable …**Amend to read '65 per cent of all new homes delivered across London to be social rented'.**

B 4.5.2…the mayor is adopting a threshold approach to viability. This means that schemes meeting or exceeding the threshold without public subsidy, or consistent with the requirements in Part C of Policy H6 Threshold approach to applications, are not required to submit viability information…**If this policy is to remain, the threshold should be 65 per cent social rented homes. See point 4.5.4. below.**

User:	Pat Turnbull

4.5.4. …In previous years where there has been a relaxation in affordable housing and other planning requirements this has typically led to higher land values, rather than an increase in housing delivery …the London SHMA has identified that 65 per cent of London’s need is for affordable housing.

User: Mrs Sue Davies

National policy changes are needed on the number of vacant houses that are to be found throughout the capital. Its a national scandal that so many in central London are empty and owned overseas. How much do we need these parasitic investors? This is private enterprise gone mad. If they do own them they should be obliged to rent them out or we should be charging them exhorbitant rates to keep them empty. A solution must be found.

We need low rent housing in the centre of London to keep all the services going there:' bussing' workers in daily is not the answer - it creates an even greater underclass - how can there be any sense of community without creating them as mixed employment areas as they once were? You have a lot of work to do here.

User: Association of Directors of Public Health

We welcome the policies in H5 to H8 concerning delivering affordable housing, and in particular references to the Affordable Rent Programme and London Living Rent homes as a significant step toward an accessible London housing market.

We will, however, welcome clarification of H5 A 3) ‘Affordable housing providers with agreements with the Mayor delivering at least 50% affordable housing across their portfolio’. This sort of statement can easily be misinterpreted, and lead to gentrification in areas of high property value, with risks of separating extended families and support networks for example. We would like to see this amended to **Affordable housing providers with agreements with the Mayor delivering at least 50% affordable housing across** (i.e**.** delete their portfolio) **each development.**

We know that affordable housing definitions can vary, which places at risk disproportionate numbers of people from BME, older people, disabled and low income groups living in social housing more at risk of homelessness. We also know that genuinely affordable homes are also vital to increasing the likelihood that family units remain within close proximity, which has inherent benefits such as family members supporting each other with childcare and supporting older family members.

We ask the Mayor develops with partners, appropriate definitions for all housing needs, and is more explicit about the links to the objectives in his Health Inequalities Strategy.

User:	South West London Environment Network

Although we agree that more affordable housing is needed, we are not clear how the housing targets have been reached bearing in mind the wider south east commuter area, the Government's desire to re-focus development away from London to the regions and the effects of Brexit where many people may leave London.

User: Mr Graeme Fraser-Watson

1. Affordable Housing
   I totally support the need for more affordable housing. We must ensure that there is a better supply of affordable housing for young people and for workers in our essential services. The absolute requirement for developments to include a large percentage of affordable housing would, if properly implemented, ensure that development land prices reflect this requirement.

User: Save Swiss Cottage

2. The draft plan seeks to build 65,000 new houses each year, 32,500 of which must be affordable. No finances are given for the affordable housing, but the cost over ten years is estimated to be circa £80 billion, i.e. more than twice the budgeted cost of HS2. The Mayor accepts that there are inadequate finances for the draft plans to be delivered.

10. In conclusion the key objective of increasing affordable housing is laudable, but the definition of what is affordable is out of reach to the average wage and the targets are unrealistic, unfunded, and unsustainable. Further in the attempt to achieve this key objective the draft plan is seeking to set aside much of the existing planning framework, in a way that is detrimental to London and not in accordance with legislation and National Planning Policy. The draft plans should be rejected.

User: Balfour Beatty

Policy H5 – Delivery of affordable housing While we recognise that the delivery of affordable housing across public sector land portfolios is a key priority for the Mayor, and while we support the principle behind the policy, Balfour Beatty is concerned that the evidence base for the Draft New London Plan does not support the specific 50% affordable housing target. In addition to the London Plan Viability Study (December 2017), which wrongly assumed that all public sector land will be able to support 50% affordable housing due to low benchmark land values, the policy also does not take into account that public sector organisations rely on value released through disposals in order to allow them to reinvest in critical public infrastructure projects. Ideally public sector land should be treated the same as land in any other ownership, and at the very least, a mechanism should be included in the policy to allow public sector organisations to set out cases for exemptions from the proposed higher 50% affordable housing target where it can be demonstrated that there is a need to release value to fund infrastructure. We accept that the 50% is a threshold that will be tested through viability. However, this in itself creates uncertainty that can frustrate surplus land from coming forward for much need housing development.

User: L&Q

2. The delivery of ‘genuinely affordable’ housing should be afforded significant weight as a material consideration in favour of a planning application3 – There is significant identified need for affordable housing. In view of this, where planning applications deliver affordable housing this should be identified as a significant consideration that weighs in favour of a planning application. The draft London Plan does not currently advise this. A presumption is again important because it will elevate this matter as a planning consideration for the decision-maker. In addition to the above, the London Plan should provide a concise definition of ‘genuinely affordable’ that can be straightforwardly cited by all, including Officers, decision-makers and Londoners. As it stands, that ‘genuinely affordable’ (a new term introduced by the Mayor of London) is not defined in a single place in the draft London Plan. This makes its meaning (and the change that the Mayor has introduced in this regard) harder to explain to Londoners.

4. The London Plan must focus on the delivery of affordable homes rather than what is secured by planning permission5 - National planning policy focuses on the delivery of homes (including affordable homes) rather than what is described in planning permissions. The London Plan monitoring targets should equally focus on delivery, not what planning permissions approve. A fundamental point is that the ratio of affordable homes delivered is not always defined by a planning permission. In practice, funding (including sources of grant) can be invested postpermission so that more homes are realised than the minimum number specified by a planning permission. The planning application stage should therefore be considered as the ‘without grant’ scenario. Discussions on grant at the application stage can delay the determination of planning applications and thus the delivery of homes. The draft London Plan should be revisited so that it does not seek any commitments regarding the use of grant funding to be made at the planning application stage.

5. More support should be provided for middle earners6 – Affordable housing Income thresholds should be revisited to help middle earning Londoners faced with the ‘housing crisis’. In the first instance the household income cap for access to intermediate rent should be restored to £90,000.

6. Housing Associations must be able to compete on a level playing field7 – Planning law does not support any approach in which different standards are applied for different applicants at the application stage. Affordable housing providers (e.g. Housing Associations) should not be asked to make commitments that are not required of other applicants. On this point, the Draft London Plan, together with the Housing and Viability SPG), is unsound. L&Q and the GLA have underlined their commitment to work together in partnership to deliver homes and affordable homes in London through a new, well-funded Strategic Partnership. Through this partnership, L&Q is committed to delivering 60% of homes built as affordable, including London Affordable Rent, London Living Rent and Shared Ownership. This model allows the partnership to maximise delivery in the right locations across L&Qs ambitious home building programme, benefitting from both grant funding and

crosssubsidisation gained from L&Q’s own surplus and funding. It is clear, however, that schemes need to be delivered within a highly competitive open market, and therefore setting a higher bar for Housing Associations at the planning application stage is counter-productive and could potentially hinder, rather than aid, the delivery of the programme. L&Q feels very strongly that best means for guaranteeing delivery of its affordable homes programme is through the Strategic Partnership and funding agreement, and this is best kept separate from the planning regime The draft London Plan must be amended to clarify that affordable housing providers (e.g. Housing Associations) are not expected under the draft London Plan to achieve different levels of affordable housing delivery than other applicants on a site-by-site basis. The draft Plan must also be revised so that commitments regarding the investment of grant funding are not sought at the planning application stage. This is for the reasons outlined in our accompanying note.

Policy H6 Threshold approach to applications

User: Crest Nicholson PLC

We consider this Policy to be unsound as currently drafted and amendments are required.

Policy H6 Part B(2) and explanatory text paragraph 4.6.5

Crest Nicholson do not agree with Policy H6B and believe the evidence base and the justification for the threshold level of 50% affordable housing for public sector land needs to be set out more clearly and examined for soundness. Any policy position needs to have prospect of being achievable, but this has not been demonstrated. In respect of the threshold level of 35%, further justification for this level is also required. Crest Nicholson suggest the wording is amended to include the exception of very special circumstances.

Policy H6 Part B
Given the 35% forms part of a policy, Crest Nicholson considers that this percentage can only lawfully be be altered through a review and revision of Policy H6 itself rather than what is being proposed i.e. via SPD.

Policy H6 Part B (3)

Crest Nicholson objects to the 50 per cent threshold for “Strategic industrial Locations, Locally Significant Industrial Sites and other industrial sites deemed appropriate to release for other uses”. When converting such sites to residential use there are often significant technical constraints and high associated construction/build costs such as remediation of contamination from previous industrial uses and additional noise/vibration attenuation required to allow residential and residual employment uses to sit alongside one another. Such costs may have a detrimental effect on viability as regards achieving the 50 per cent threshold. Given the Government’s brownfield first agenda, the Mayor’s desire to accommodate housing need within the London Plan area rather than export need to neighbouring authorities and other policy aspirations such as protection of the Green Belt, these industrial locations will have been released for alternative residential uses to address housing need. It would be counter-productive to impose unnecessarily high thresholds as compared to other non-public sector land as this may stymie development of such sites thereby resulting in such sites laying dormant so not delivering the market and affordable housing that the Mayor is keen to achieve. We consider the application of the 35% threshold and Part C criteria would be appropriate.

Policy H6 Part C (3)

To provide flexibility and to enable some discretion for the Boroughs, Crest Nicholson considers that Part C (3) should be re-drafted to allow the Boroughs to decide the overall policy package having regard to the overall viability of the scheme and other material considerations. We would propose the following change to Part C (3):

“meet other relevant policy requirements and obligations where feasible and viable to the satisfaction of the borough.”

Policy H6 Part C (4) and Explanatory Text 4.6.9

Crest Nicholson object to the manner in which the threshold level of affordable housing is set then augmented by the additional criteria in Part C (4). The consequence of Part C(4) is that it requires applicants to have to seek confirmation of an offer for acquisition of units with grant from Registered Providers in advance of a planning application being submitted in order to secure a fast track application route. The Registered Providers may be able to use non-specific site grant that they have been awarded by Homes England but any grant offer will be subject to a time frame which the applicant may not be in control of; and further sometimes grants and indeed offers from Registered Providers are withdrawn. Therefore it would be unreasonable to require applicants to seek grant in order to qualify for the fast track route. Instead we suggest that if the Mayor wishes applicants to pursue grant funding opportunities that this requirement be incorporated into a new separate sub-policy that requires applicants during the determination of the application to seek opportunities to secure grant funding and evidence of such efforts and their results be supplied to the determining authority. Grant will not be available for affordable housing secured by way of s106, so it would be important to ensure that any additional affordable housing provided by way of grant be documented outside of the s106 instead via planning condition. This requires amendment to explanatory text paragraph 4.6.9.

Policy H6 Part E (2)

The Policy requires that those applicants who have to go down the Viability Tested Route are to commit to Early and Late stage reviews. The Government's guidance in the NPPG considers that reviews after planning permission has been granted should only be considered for multi-phased (usually large) schemes that will be built out gradually over a long period of time where values may well fluctuate significantly. As the NPPG advises at Paragraph: 017 Reference ID: 10-017-20140306:

"How should changes in values be treated in decision-taking?

Viability assessment in decision-taking should be based on current costs and values. Planning applications should be considered in today's circumstances.

However, where a scheme requires phased delivery over the medium and longer term, changes in the value of development and changes in costs of delivery may be considered. Forecasts, based on relevant market data, should be agreed between the applicant and local planning authority wherever possible."

It is not appropriate for the Mayor to expect all single phase developments to submit to an Early and Late Review; which would add delay and uncertainty and may impede sustained housing delivery.

Further it does not appear that any thought has been given as to how Policy H5 Part B and this part of Policy H6 interact. Policy H5 Part B states that contributions by way of cash in lieu of on site provision should only be provided in exceptional circumstances. Where a late review if undertaken pursuant to Policy H6 Part E (2)(b) it may not be practically possible to accommodate additional affordable housing on site. For example where dwellings are provided within tall buildings, the whole building will have been constructed and dwelling units formed (although perhaps not not all fitted out capable of occupation) by the time when the Late Stage review as proposed by the draft policy is triggered, so the size or location within the building of remaining dwellings may not be appropriate for affordable dwellings. As such late stage viability reviews should factor in and permit contributions to be made in cash or off-site rather than on site.

We recommend that Part E 2) is amended to read that:

"Viability tested schemes will be subject to an Early and Late Stage Review where such schemes involve several distinct phases to be built out over several years. Single phase schemes will not be subject to Early or Late Stage Reviews. Where Late Stage Reviews identify that additional affordable housing is capable of being delivered then this may constitute exceptional circumstances for the purposes of Policy H5 Part B should it not be feasible or appropriate for any reason to accommodate such additional affordable housing on site."

Policy H6 explanatory text paragraph 4.6.11

We concur with the HBF's representation on this policy and text. The Mayor's direction in this paragraph that Existing Use Value Plus (EUV+) be the only presumed approach to determining benchmark land value (BLV) is unsound because it is inconsistent with national policy. The Mayor cannot insist that his favoured approach to determining BLV is followed and require all developers to conform to this. First it is unclear what amounts to an acceptable 'plus'. Second, the NPPF requires plan-makers to ensure viability which includes the need to "provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable". This could involve using EUV+ as a way of assessing the viability of a scheme, but it might not and other viability models should not be discounted out of hand. Landowners need to be incentivized to release land for development and have their own minimum requirements to encourage them to do so. They and applicants may also have their own approaches to assessing viability. We note that the Harman viability guidance does not specify that EUV+ is the only route appropriate to assessing viability. See the discussion on page 29 of the Harman Report for example the note that:

"The precise figure that should be used as an appropriate premium above current use value should be determined locally. But it is important that there is evidence that it represents a sufficient premium to persuade landowners to sell."

London is a large geographic area with widely different land and development values. Establishing appropriate Benchmark Land Values is best left to the local planning authorities when preparing their Local Plans. It cannot be done on a pan-London basis.

The Mayor cannot and should not stipulate EUV+ as the basis for assessing scheme viability. The Mayor will have to adopt a more flexible approach. We recommend that paragraph 4.6.11 is deleted.

User: CBRE Global Investing

Policy H6 states that a threshold approach to allow planning applications to be ‘fast tracked’ (i.e. not having to provide a viability appraisal at application submission stage) should be applied to affordable housing within development proposals capable of delivering more than 10 units. The threshold level of affordable housing is initially set at:

1) a minimum of 35 per cent;
2) 50 per cent for public sector land;
3) 50 per cent for Strategic Industrial Locations (SILs), Locally Significant Industrial Sites (LSISs) and other industrial sites deemed appropriate to release for other uses (see Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London’s economic function).

Points 1) and 2) were included in the Mayor’s Affordable Housing and Viability SPG (2017) Consultation, however, point 3), which requires SIL/LSISs to also provide 50% affordable housing, was not, and was included within the adopted version without having undergone a formal consultation process.

CBRE Global Investors does not consider the 50% requirement for SILs, LSISs and other industrial sites appropriate given the aim of the policy to maximise the efficient use of land to deliver mixed-use residential schemes which include affordable housing. LSIS/SIL-led mixed-use development already faces development constraints as set out in the discussion regarding Policy E7, and therefore, further requirements to provide significantly higher levels of affordable housing as well as preserving industrial floorspace on underperforming industrial sites will not achieve positive planning.

There are implications in terms of viability, deliverability, density and design. Many industrial sites are contaminated and complex brownfield sites. As such, it is at significant risk that developers will proceed with such proposals, particularly if these are co-located with industrial uses and required to provide 50% affordable housing. Redundant industrial land is an important source of housing supply which should be optimised, and it is considered that this policy will discourage its redevelopment, which will work against the strategic aims of the plan.

Therefore, there is unlikely to be sufficient incentive for developers or landowners to bring forward SIL/LSIS sites for intensification and co-location of uses as promoted by Policy E7, given the minimised developer return which would render sites unviable, and may risk development which is caught by the affordable housing review mechanism as stipulated within the Mayor's Affordable Housing SPG. Furthermore, due to the uncertainty and protracted timescales associated with the non-fast tracked route, it is highly unlikely that such sites will come forward for development of residential uses, which will restrict and constrain a significant source of housing supply from these sites.

Under Policy H6 part D there is a requirement for Fast Tracked applications to undergo a viability review should an agreed delivery timescale (two years from implementation is suggested albeit could be varied at the Borough level) not have been met. This element of the policy is not considered to represent positive planning as applicants who have provided a policy compliant affordable housing mix in order to speed up delivery through the planning process could then be penalised with further delays and obligations during the delivery phase of development, thus providing limited incentive for applicants to follow the Fast Track route. Major schemes providing affordable housing can easily take more than 2 years to progress to implementations and delivery, particularly brownfield sites which are subject to outline planning permission for example. Land ownership constraints and site preparation works are likely to cause longer timescales for implementation. Furthermore, such policy will add delay to implementation given the level of uncertainty over the financial returns from the development, which will have significant implications on land disposal for delivery to housebuilders and Registered Providers.

Part E (2) of the Policy stipulates that where applications have been viability tested, they will be subject to at least two subsequent reviews, one at 2 years as above, and one on completion of 75% of unit sales/lettings. Further reviews mid-phase may be added by Boroughs.

For the reasons above, and the addition reasons that, if an applicant has gone through the arduous viability review process, there should not be further burden placed on the re-assessment of this given that the applicant and Borough will have rigorously tested and agreed an appropriate level of Affordable Housing provision to make the development acceptable.

We therefore propose that the timescales for review be extended to reflect the reality of delivery of complex urban sites, to 5 years post-grant of planning permission/implementation.

Proposed Policy Amendment Sought

CBRE Global Investors does not consider this 50% affordable housing requirement appropriate on SIL/LSIS sites, and would request that point 3 of Policy H6 be removed. Furthermore, we propose that the viability review triggers in part D and E are explicitly extended within the policy wording to 5 years to provide sufficient yet realistic incentive for delivery.

User: Catalyst Housing Limited

AFFORDABLE HOUSING

Draft Policy H6 sets out the threshold approach to applications, which CHL generally supports.

However, CHL objects to the 50% threshold to be applied where SIL, Locally Significant Industrial Sites ('LSIS') and other industrial sites come forward for residential development (this also applies to draft Policy E7 and supporting text). Sites of this nature are likely to be very expensive to deliver; imposing a 50% threshold will exacerbate this and could frustrate delivery. If the principle of releasing a particular site for alternative use is deemed appropriate, it should not then be subjected to additional burden by comparison to any other development site, particularly when the remediation and other costs are likely to be high. The threshold should therefore be reduced to 35%, consistent with other development sites.

Parts G-J of draft Policy H6 relate to S73 applications. It is quite common to seek revisions to largescale schemes that are developed over many years, in order for the later phase(s) to respond to (for example) changes in circumstance. In the case of estate regeneration, this often results in enhanced regenerative benefits. If a later phase(s) is built out under a new S73 permission, it has to be able to work with the original consent, given that some elements of the scheme (not least the provision of affordable housing) will have been based upon a site-wide strategy and carefully calibrated accordingly. Whilst revisiting a later phase through S73 (or indeed through an entirely fresh application) may present an opportunity to consider any additional benefits that might arise (compared with the extant consent), we think it is important to take the extant consent into account as a material consideration, with sufficient flexibility within policy to enable exceptions to avoid prohibitive requirements. In other words, the site should still be considered holistically.

Paragraph 4.6.3 of the supporting text states that the percentage of affordable housing on a scheme should be measured in habitable rooms, but also refers to floorspace. It then goes on to state that applicants should present affordable housing figures as a percentage of total residential provision in habitable rooms, units and floorspace to enable comparison.

It is essential that there is clarity as to what the ultimate 'measure' is – if an estate regeneration scheme is measured such that reprovision is secured to avoid net loss of habitable rooms and floorspace and unit numbers, this will not work and could compromise the ability to effectively meet the needs of the existing community. For example, an estate characterised by over-occupation may need a smaller number of larger units; one characterised by under-occupation may need a higher number of smaller units. In the case of the CHL Portobello Square in RBKC, the legal agreement secures the provision of either a minimum number of units or habitable rooms, with the 'fix' being 'no less than' X floorspace.

User:	Benhill Residents

We object to this policy – for pretty much the same reasons as above.

Having a threshold 35% target for ‘affordable homes’ will not necessarily address evidenced need.
Policy H7 – Affordable housing tenure

User: 313-349 Ilderton Road LLP

Policy H5 Delivering affordable housing sets out the strategic target is for 50 per cent of all new homes delivered across London to be affordable.

We support the principle of affordable housing however it should be noted that any increase from the adopted viability thresholds within Boroughs Development Plans up to 50% can jeopardise development and viability testing should be accounted for in the determination of planning applications.

The policy will result in the Mayor's Affordable Housing and Viability SPG becoming policy which will prejudice the delivery of housing. The threshold approach, explored further below, sets out that applications must be "consistent with the relevant tenure split and meet all of the other relevant policy requirements and obligations" to qualify for Route B 35 per cent affordable housing. However, the requirement for the developer to meet all other 'requirements and obligations' will ultimately result in most schemes becoming unviable. The requirement of more extensive clawback mechanisms for schemes below the target threshold could also prove detrimental to housing delivery, particularly when review mechanisms are applied to all major applications, not just more complex and phased schemes.

It is specifically recommended that where planning applications are commenced within 2 years of the date of the consent and where this is delivered in a single phase no review mechanism is necessary. This provides certainty to the development industry and provides a clear focus upon the initial/ submission stage financial viability exercise. The move towards the review mechanism process undermines the initial stage Financial Viability assessment and represents a retrograde approach to a plan-led and front-loaded planning application system.

This is supported by the Royal Institution of Chartered Surveyors within the 'Financial Viability in Planning' Report (2012) which states that re-appraisal mechanisms should only be considered in exceptional cases. The approach as proposed does not provide a robust or consistent policy and is therefore unsound in this regard.

User: 313-349 Ilderton Road LLP

Policy H6 Threshold approach to applications sets out the threshold approach which applies to development proposals which are capable of delivering more than ten units or which have a combined floor space greater than 1,000 sqm. The threshold level of affordable housing is initially set at:

1. a minimum of 35 per cent;
2. 50 per cent for public sector land;
3. 50 per cent for Strategic Industrial Locations, Locally Significant Industrial Sites and other industrial sites deemed appropriate to release for other uses (see Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function).

It further sets out the Fast Track Route of the threshold approach and the Viability Tested Route as already published within the Mayor's Affordable Housing and Viability SPG.

We do not support this requirement for 50 per cent affordable housing provision in areas designated as Strategic Industrial Land. This conflicts with the delivery of the housing and employment floorspace, particularly within Opportunity Areas. Such areas are critical in realising identified housing need and imposing a punitive and arbitrary increase in minimum affordable housing threshold is unsound, particularly where infrastructure requirements are also part-funded through development.

For example the London Borough of Southwark, where the adopted Development Viability SPD (2016) requires 35 per cent provision, maintains this headline level of affordable housing whilst introducing an increased CIL charge rate of £218 per square metre for the Bakerloo line extension. Together with the plan requirement for B Use class floorspace re-provision, the cumulative impact of this financial burden will prejudice the delivery of 20,000 homes in the Old Kent Rd Opportunity Area and Area Action Plan, where the policy requirement is increased to 50 per cent affordable housing. The financial viability testing that underpins the Southwark Plan demonstrates that the 35 per cent affordable housing provision represents the maximum viable level of provision .

In respect of the threshold approach, under Route B of the Affordable Housing and Viability SPG, the developer has to meet the 35 per cent threshold to avoid having to provide a viability assessment but the application must also be “consistent with the relevant tenure split and meet all of the other relevant policy requirements and obligations”. This means a scheme under route B must meet all statutory and non-statutory requirements. The available evidence base demonstrates this is not possible and will result in all schemes proceeding via route A. In order to avoid this, it is imperative that a practical and viable policy level of affordable housing is specified in Strategic Policy.

User: Elaine Chambers

H6 Threshold approach to applications

6.1 We object to this policy – for pretty much the same reasons as above.

6.2 Having a threshold 35% target for ‘affordable homes’ will not necessarily address evidenced need.

User: Royal London

Policy H6 – Threshold approach to applications

RL supportive of threshold approach in principle. However, to provide certainly to the market and ensure residential delivery there needs to be greater clarity and confidence given that boroughs will comply with this approach (both in terms of total provision, tenure and review mechanisms). Paragraph 4.6.13 (different levels in Opportunity Areas) needs to be changed to provide more confidence and clarity to developers who are bringing forward or purchasing land at significant risk. An explicit sentence within the policy requiring LPAs to comply and ensure policies are in accordance with this approach would assist greatly rather than the current wording which could lead to Councils at a local level taking a different approach undermining the certainty that this policy aims to provide to the development sector.

In relation to the 35% threshold based on our experience of development viability we consider that this provision as a standard is too high and that a reduced level of a maximum of 25% would better reflect the typical viability of proposals in London. We would consider that this level would be much likelier to result in the residential delivery coming forward top meet the needs as established within the Plan.

RL do not consider the 50% requirement for SILs, LSISs and other industrial sites appropriate or well considered. There are implications in terms of viability, deliverability, density and design. Many industrial sites are not located in areas of high land values, and are often complex sites adjacent to other industrial uses with poor public transport connections. As such, it is at significant risk that developers will proceed with such proposals, particularly if these are co-located with industrial uses and required to provide 50% affordable housing. Furthermore, industrial sites often have abnormal costs due to contamination, the provision of open spaces etc, which can further dis-incentivise delivery. Redundant industrial land is a big source of housing supply which should be optimised, and it is considered that this policy will discourage its redevelopment. RL do not consider this 50% affordable housing requirement appropriate, and would request that sub point 3 in the above policy thresholds is removed with the same fast track threshold target provision applied as for other land uses.

In relation to viability our experience is that insufficient weight or consideration is given to legitimate risk and costs in terms of legals, neighbourly matters, changing market conditions, build costs and time. We would press the GLA to provide confidence and certainty that these matters will be fully taken into account when assessing the viability of proposals. Our valuations are based on RICS Red Book guidance and this should be a starting point for any viability assessment. In addition, RL have significant concerns over the misuse of viability review mechanisms which provide no incentive to maximise returns and are unduly cumbersome in application. We would request that the GLA is very firm with boroughs who are applying review mechanisms as standard contrary to the approach of the GLA and direction of the Draft London Plan.

User: Fairview New Homes

Fairview supports the use of Supplementary Planning Guidance in setting the 35% Affordable Housing threshold for fast track planning applications. We know from our experience this introduced certainty and consistency which is important for developer confidence and rapid delivery. We continue to support the Mayor in Policy H6 (Part B) in the need to keep the percentage reviewed on a regular basis. We would question whether this should be undertaken on a more regular basis reflecting trends in the property cycle. 35% affordable provision works in many instances now, but if we are at the top of the property cycle as many leading commentators suggest, a reduction in the threshold maybe required within the next 2-3 years, to ensure delivery is not slowed by overly prescriptive viability reviews.

In respect to H6 B(3) we remain concerned that 50% is being applied on SIL and LSIS across the capital without any scope for local circumstances to be reflected. The values of SIL/LSIS vary enormously across the Capital. It is of note that Southwark's Old Kent Road Masterplan has tested viability in SIL for a central London Borough and determined 35% Affordable provision to be appropriate. It cannot, therefore, be the case that higher percentages should be the threshold in places like Hillingdon and Barnet. Each Borough and each risk needs to be individually and carefully tested. Even a banding of Borough's would reflect a more logically position.

We share the HBF concern in respect to (H6, Part C, 3). No application for residential development made in London is ever able to be fully policy compliant in all respects. To provide flexibility, and to restore an element of discretion to the London Boroughs, we strongly recommend that Part C 3) is re-drafted to allow the London Boroughs to decide the overall policy package having regard to the overall viability of the scheme and other material considerations.

In respect to Part H6(D) Fairview supports the early stage review process providing there is clear guidance on what constitutes a reasonable level of progress and that the period for compliance is no more than 2 years. As many authorities will not accept that they are performing very badly in clearing too many conditions, it is important that their poor performance does not trigger unnecessary reviews.

Recommendation
Part H6(B)
“The effectiveness of the 35% threshold in supporting housing delivery will be reviewed in 2019 and if appropriate, a review of the London Plan will commence to revise Policy H6 if by 2020 housing delivery has fallen below the target of 65,000 net additions.

Part H6(D) – clarity on the agreed level of progress on implementation is required.

User:	Fairview New Homes

Whilst we agree with the HBF reps on the Existing Use Value Plus we are also pragmatic that many of the London Boroughs are following a similar approach and what is needed now is consistency and certainty.

User:	Earls Court Public Sector Tenants' Assoc

We object to this policy – for pretty much the same reasons as above.

Having a threshold 35% target for ‘affordable homes’ will not necessarily address evidenced need.

User:	London Industrial and Logistics Sounding Board

The 50% threshold for SIL and LSIL sites will mean that most sites will need to go through the viability tested route. We do not consider that it reflects the costs of delivering intensified industrial uses and may act as a deterrent to intensification of existing sites and potentially slow the speed of housing delivery. The plan should therefore clarify if this is the intention of the proposed threshold. This policy objective could also undermine the plan's other objectives to seek to deliver affordable workspace through Section 106 obligations.
In certain locations, there may also be opportunities for co-location of non-residential uses – such as offices – on industrial sites. This policy should encourage local authorities to work with local businesses and land owners to identify such areas in their Local Plans.

User:	Silvertown Homes

Part C 4) of this policy states that to ‘follow the Fast Track Route of the threshold approach, applications must meet all the following criteria… demonstrate that they have taken account of the strategic 50 per cent target in Policy H5 Delivering affordable housing and have sought grant where required to increase the level of affordable housing beyond 35 per cent’

For the same reasons set out above, this clause should be removed. Applications for planning permission should be determined based on their ability to provide affordable housing, without reference to grant funding.

User:	Brixton Society

H5 & H6, Affordable Housing: Despite planning permissions in our borough exceeding London Plan targets, the percentage of affordable dwellings being achieved is disappointingly low. We support rigorous viability assessments and the threshold approach set out in **H**6.
We deplore the practice of dividing sites into separate phases or ownerships to evade affordable housing contributions. Smaller sites should also contribute, even if it may not be practical to do so within each site. We therefore welcome policy **H5.**

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User: Silvertown Homes

Delivery of affordable homes at industrial sites

The draft policy currently seeks 50% affordable housing at (most) industrial sites.

However other policies in the plan present other challenges to delivering viable schemes at such sites (including a methodology which will nearly always or always seek an uplift in Class B2 and/or B8 floorspace.

In practice such developments will generally be subsidised by the market housing provided. As such seeking 50% affordable housing from such developments will disincentivise if not preclude such development being brought forward.

In view of the overall objectives set out across the draft London Plan the threshold land of affordable housing should be the standard threshold applied (currently 35%).
If industrial floorspace is still being delivered or re-provided on site then there is no justification for 50% as the land won’t be lost for SIL.

User: Silvertown Homes

‘The EUV+ approach is usually the most appropriate approach for planning purposes… and in most circumstances the Mayor will expect this approach to be used. An alternative approach should only be considered in exceptional circumstances which must be robustly justified by the applicant and/or the borough in line with the Mayor’s SPG.’

This statement is unrealistic. It is very often the case that development for an alternative land use to housing (for example offices) would also be supported in principle. In such instances an applicant will simply not pursue a residential scheme if it does not achieve an equivalent financial outcome. Such an instance would not be ‘exceptional’.

The draft London Plan must be revisited to recognise that reference to an alternative use value is entirely appropriate. Not recognising this could mean protracted discussions and a delay to the delivery of new homes.

User: New Policy Institute

Delete B1, B2 and B3 and replace with:
B1) a minimum of 40 per cent affordable housing OR 30 per cent low-cost rent (social rent or London affordable rent)
B2) 47 per cent low cost rent (social rent or London Affordable rent) and 18 per cent intermediate for: public land; Strategic Industrial Locations; Locally Significant Industrial Sites; other industrial sites deemed appropriate to release for other uses.

The 2017 Strategic Housing Market Assessment (SHMA) has identified that 65 per cent of housing in London needs to be affordable with 18 per cent of these intermediate housing products and 47 per cent low-cost rent. The threshold level of affordable housing set at 35 per cent is therefore barely half what is required.
To give the SHMA real force, some developments must adhere to the letter of its recommendations. This amendment identifies which those should be. It also raises the general threshold and prioritises low-cost rent housing (social rent or London Affordable rent)

User:	New Policy Institute

Add to F:
Viability assessments should be made publicly available.

Where viability assessments are required these should be open to public scrutiny. This is intended to ensure a focus on the maximum delivery of affordable homes

User: Orbit

As per comments under draft Policy H5, Orbit welcomes confirmation on land which is purchased and which was previously under public sector ownership is not required to fulfil the threshold affordable housing target of 50%.

In response to the threshold requirement of 50% affordable housing provision for industrial sites, Orbit considers that this figure should be reduced and instead the provision on these sites should be considered on the same basis as other sites. This is because the redevelopment of industrial/brownfield land can present significant viability challenges which can make a development unviable if 50% affordable housing is also required as a minimum. We would question the assumption about the difference in values between industrial and residential development, in some cases the value of land in industrial use in some areas can be equivalent to land in residential use, making a 50% requirement for affordable housing unachievable.

Orbit considers this high threshold level may prevent housing coming forward on appropriate industrial sites, which in turn could lead to boroughs ambitious housing delivery targets not being achieved.

In relation to draft supporting paragraph 4.6.14, Orbit would welcome a definition as to the scale of ‘demolition of existing dwellings’ which would trigger the requirement for schemes to follow the Viability Tested Route. Orbit understand that this relates to estate regeneration, rather than the demolition of, for example, a singular house.

Orbit seeks clarity on the wording of draft paragraph 4.6.14.

User: London Property Alliance

Policy H6(A) should be amended so that it is clear that the threshold approach applies to residential development. We propose the following amendments:
“The threshold approach applies to residential development proposals and mixed use development proposals that include residential that are capable of delivering more than ten residential units or which have a combined residential floorspace greater than 1,000sqm.”

The Alliance considers that the threshold level for the use of the Fast Track Route should be either the local affordable housing target, or 35%, whichever is the lower, to relate to the central London context where the maximum reasonable level has been established at between 25% and 35%.

The Alliance has previously advised that review mechanisms should not be used.17
If they are to be retained, they should:
a) Not be applied to proposals that achieve the local affordable housing target; and
b) Not require profit share above a level equivalent to meeting that local target.

It is likely that some housing and affordable housing development within the CAZ will continue to come forwards as a result of local mixed-use policies as provided for at Policy SD5(I). This type of development will frequently provide a range of on-site and off-site provision, as well as financial payments. In most cases, such schemes would be required to follow the Viability Tested Route, even where the local affordable housing target was met. This, in itself, may discourage commercial development which is contrary to the objectives for the CAZ within SD4.

Use of off-site affordable housing, and payments in lieu, should not automatically trigger the need to follow the Viability Tested Route. Policy H6(C)(1) and paragraph 4.6.14 should be amended accordingly (see our comments, above regarding the relative priorities for on-and off-site provision).

Alternative Use Value (‘AUV’) should be an acceptable contributory factor in establishing the benchmark land value for development schemes within the CAZ, given the high values associated with other uses permitted by Development Plan policy that do not require affordable housing. For example, an underused site within the CAZ could be redeveloped for a range of potential uses beside residential and the site’s value should reflect these, rather being based only on the EUV+ approach. Paragraph 4.6.11 should be amended accordingly to recognise the role of AUV within the CAZ.

Policy H6(C) should provide for greater flexibility in affordable housing tenure types, both in type and proportion, especially within the CAZ. Some variation from the Mayor’s preferred mix should be permitted without automatically requiring development to follow the Viability Tested Route.

User: London Property Alliance

Scheme Amendments – Section 73 applications and deeds of variation (Policy H6G-J)

The Alliance considers that it is not appropriate for the strategic plan to set out within policy detailed procedural requirements as to how certain types of applications, such as Section 73s, will be determined. S73 applications are common for most large developments progressing through detailed design, including those that have been through the Viability Tested Route. Requiring such schemes to be re-appraised or to prove that there is no change to the ‘economic circumstances’ of the scheme introduces potential additional uncertainty, cost and delay at a time in the development cycle when physical works are often already underway. The unintended result will be that developers will not submit S73 applications but rather proceed with schemes as they are approved which do not fully adapt to changing market and occupier requirements.

Sections G – H of Policy H6 should be deleted.

User:	Vital OKR

para 4.66 requiring higher levels of affordable housing on land released from industrial, is unlikely to be realistic, and it could have the effect of suffocating the potential for industrial intensification associated with such developments, and the potential for incorporating industrial as part of mixed developments that include residential. The objectives for greater weaving in of industrial accommodation, and increased density (including multi?storey) presents viability challenges that are proving hard to overcome. This policy needs careful review.

User: Barratt Developments plc

The draft policy currently seeks 50% affordable housing at (most) industrial sites. However other policies in the plan present other challenges to
delivering viable schemes at such sites (including a methodology which will nearly always or always seek an uplift in Class B2 and/or B8 floorspace. In practice such developments will generally be subsidised by the market housing provided. As such seeking 50% affordable housing from such developments will disincentivise if not preclude such development being brought forward.

In view of the overall objectives set out across the draft London Plan the threshold land of affordable housing should be the standard threshold applied (currently 35%).

User: Barratt Developments plc

‘The EUV+ approach is usually the most appropriate approach for planning purposes… and in most circumstances the Mayor will expect this approach to be used. An alternative approach should only be considered in exceptional circumstances which must be robustly justified by the applicant and/or the borough in line with the Mayor’s SPG.’

This statement is unrealistic. It is very often the case that development for an alternative land use to housing (for example offices) would also be supported in principle. In such instances an applicant will simply not pursue a residential scheme if it does not achieve an equivalent financial outcome. Such an instance would not be ‘exceptional’.

The draft London Plan must be revisited to recognise that reference to an alternative use value is entirely appropriate. Not recognising this could mean protracted discussions and a delay to the delivery of new homes.

User: London Borough of Newham

Policy H6 Threshold Approach to applications

LBN object to the threshold approach to affordable housing set out within draft policy H6. In introducing a sweeping approach at regional level, the Mayor may inadvertently impede individual boroughs' ability to gain more from development proposals in terms of an affordable offer. Indeed, impacts are already being felt with the Council's officers spending disproportionate time during Development Management negotiations justifying an already adopted position which yields considerable levels of affordable housing.

LBN's current approach – a 50% strategic target delivered through a 35% to 50% range target - accounts for variations in land values in different parts of the borough, and acknowledges the potential for large scale regeneration to impact upon growth and have considerable effects on levels of affordable housing available in schemes. Given that recent high level viability testing (undertaken as part of Local Plan review) is clear that some sites in Newham can achieve the maximum level now, whilst others are more likely to in the future when factoring in growth, it is necessary to ensure that detailed viability testing takes place between the 35% and 49% range on all sites (not just those subject to SIL release or under public ownership), to allow for full interrogation of schemes. With this approach, LBN currently delivers affordable housing at a healthy consistent rate (in excess of many other London boroughs) and it is essential, given updated viability work, that this position be upheld. Whilst it is understood that the GLA is attempting embed affordable housing requirements into land values, 35% instead acts as a cap and flexibility should be applied to that threshold where boroughs have supporting evidence. It is considered possible to embed affordable housing requirements into land values at more localised levels, provided that support is given to local authorities' approaches at the regional level. Moreover, whilst the Mayor's commitment to the use of grant to boost affordable housing is welcomed, it is unclear as to why giving the variations show in the GLA's viability report, that 35% is the only threshold that is to be applied, regardless of the proposal or context.

In addition, LBN object to the assessment of affordable housing on a habitable room basis, and the application of the policy only on schemes of 11 units or more and consider that flexibility at a local level should apply. Although the London Plan approach follows the controversial Ministerial Statement and NPPG amendment, and some decisions made in court regarding the threshold for affordable housing, given the acknowledgement from a legal viewpoint that these do not render existing adopted policy null and void, it is LBN's intention to maintain the adopted policy, applying affordable housing requirements to schemes of 10 units plus.

In relation to units vs. habitable rooms, where as in Newham, a significant proportion of all new homes are sought as 3 bedroom (39% in Newham) – delivering more rooms per unit within any given scheme - seeking housing on a habitable room basis could result in less affordable provision comparably. For example, in a scheme of 10 units delivering a policy compliant level of family homes, the total habitable rooms is 31. In a borough without the family housing requirement, habitable rooms are likely to be higher. Assuming a 50% affordable provision, 5 units would be required to reach the maximum affordable threshold. If however 50% affordable provision were sought on a habitable rooms basis, only 16 rooms would be required to be affordable. Assuming that larger 3 bed units are the affordable offer, this equates to 4 affordable units, less than could have been achieved if seeking affordable provision on a unit basis. When considering the significant cumulative impact that this would have on affordable housing delivery within the borough, a unit basis remains the most appropriate approach in Newham.

The reliance on viability review mechanisms and EUV+ benchmark land values are supported

User:	London Borough of Sutton

OBSERVATION. The London Borough of Sutton considers that there is a significant degree of uncertainty whether the fast-track route will incentivise developers to avoid the viability-tested route given that the industry's arguments around viability assessments is well rehearsed. It is likely that land traders, as opposed to actual developers, will still favour the viability route over the threshold approach.

The London Borough of Sutton recommends that Clause D of Policy H6 should make references to the need for details of the Early Stage Review to be set out in a S106 agreement.

User: Old Oak Park Limited

We do not consider it appropriate for the threshold to be capable of amendment using supplementary planning guidance, given that it is such a fundamental development plan policy. However, whichever route is used to assess whether the level should increase, it should also consider the impact that 35% has had on starts and equally consider whether it should be reduced.

The supporting text to Policy H6, at paragraph 4.6.13, recognises that a different affordable housing threshold approach may be appropriate for Opportunity Areas. OOPL considers this to be essential given the very challenging nature of most Opportunity Areas and the priority to be afforded to the funding of infrastructure necessary to enable development to come forward. However, the approach taken by paragraph 4.6.13, as currently drafted, only envisages the potential for targets higher than 35% (or 50% in respect of public land). OOPL questions the logic of this. For Opportunity Areas there ought to be the ability for a bespoke threshold to be set that responds to the specific viability considerations of individual Opportunity Areas, where this can be appropriately and robustly evidenced. For some Opportunity Areas, significant funding from development may be necessary in order to unlock and deliver required infrastructure improvements – especially in respect of transport infrastructure.

The Old Oak OA is a good example of where there is a requirement for significant investment in new and improved transport and social infrastructure in order to meet or exceed the number of new homes and jobs envisaged by the Draft London Plan, and in order to deliver the quality of placemaking that the Plan requires. Development will play a critical role in realising necessary funds for this infrastructure to be delivered. The need and priority for affordable housing is wholly appreciated and supported, but clearly, there are also other priorities that must to be balanced with this. An ability for the threshold affordable housing level to be ‘flexed’ accordingly, to respond to such a balance, is considered important and necessary for the effectiveness of the Draft London Plan.

RECOMMENDATION: We request the following amendments to this policy:

- Amend Part B to recognize lower threshold levels in Opportunity Areas where these have been set through the Development Plan process, and to delete the reference to the 35% level being increased through Supplementary Planning Guidance; and
- Amend 4.6.13 to recognize that OA levels could be less than 35%.

User: Argent (Property Development) Services LLP

However, there are a range of new policy requirements in the draft Plan which will significantly add to the existing challenges of redevelopment within the OAs and we urge the Mayor's team to review these carefully. Without the following changes, we consider that the London Plan has not been positively prepared consistent with the NPPF:

1. ***Draft Policy SD1 (A5)***

This policy requires the maximisation of affordable housing. However, it should be revised to be 'maximum reasonable' consistent with viability and deliverability considerations as required by paragraph 173 of the NPPF. That paragraph states that ….*'the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.'*

1. ***Draft Policy H6 (Threshold approach to applications) & supporting text at para 4.6.13***

Argent welcomes the principle of a localised affordable housing threshold approach in OAs, however, there are similar concerns to those relating to draft Policy SD1, and the policy should not as a default set a threshold which seeks to increase affordable housing provision 'beyond 35% where possible'. As explained above, delivery of housing including affordable housing is challenging in OAs and local thresholds should be informed by each Borough's own assessment of what can be achieved in that area, taking into account of viability, deliverability, local needs and other requirements, consistent with paragraphs 47 and 173 of the NPPF. By way of an example, in Tottenham Hale LB Haringey is successfully implementing a 'portfolio approach' to affordable housing which responds to each site's specific characteristics while targeting a borough-wide figure of 40% (as set out in their adopted Local Plan). This approach means that affordable housing delivery can vary from site to site with sometimes lower than the overall policy target, taking account of the impact of other non-residential uses (health centre, education uses, social and community uses, work space) on the ability to reach the levels of affordable housing that would be possible on similar sites if they were purely residential. Further, it allows the tenure mix to respond individually to different sites across that area so, for example, in the new mixed-use District Centre, the predominant tenure mix is identified as home ownership or private rent with a minimum 25% affordable low cost ownership homes. Council land value in the District Centre can then be used to further supplement affordable homes, including higher proportions of homes for rent, in other parts of the Housing Zone, such that overall, LB Haringey will achieve their borough-wide target of 40%. Such a successful approach should be supported by the new London Plan and we would urge the Mayor's team to ensure that the text of the plan facilitates its use elsewhere.

1. ***Draft Policy SI1 (A3) Improving Air Quality***

This requires development in OAs to propose methods to achieve an Air Quality Positive Approach. The `supporting text (9.1.3) states that there should be 'an aim to be air quality positive' with reference to examples of low or zero emission heating and energy. However, such requirements are already covered by policy SI2 (minimising greenhouse gasses) and there is no justification for a different approach to OAs or whether the policy will be effective. Consequently, Argent consider that the requirement should be deleted.

Pages 28 to 56 provide background commentary on the priorities for the opportunities with the OAs grouped along transport corridors. The commentary on each of the OAs is not consistent and is insufficient, and therefore not effective, to adequately set the necessary strategic direction for these important areas. Using Argent's interests as an example, there is currently very limited commentary on the Brent Cross/Cricklewood OA and none at all on the King's Cross or the Isle of Dogs and South Poplar OAs. Contrast this with the Lee Valley OA which has a specific heading with a page of text providing context and objectives. The text should be comprehensively updated to ensure that each OA has commentary on its role, function, the current status of each OAPF.

The Draft London Plan refers to the Isle of Dogs Opportunity Area (OA), but should ensure this is updated to reflect the Isle of Dogs and South Poplar.

User: Argent (Property Development) Services LLP

Draft Policy H6: Threshold approach to applications

Argent welcomes the Mayor's strategy to seek to provide greater certainty about the approach to affordable housing, which is largely set out in Policy H6 (Threshold Approach to Applications). However, we have significant concerns around the following aspects of the policy which we consider to be unsound:

1. **Part B** states that the 35% threshold approach will be reviewed in 2021 and, if appropriate, increased through Supplementary Planning Guidance. Such an approach is inconsistent with the NPPF (Para. 173) which requires the scale of obligations to be considered to ensure that viability and deliverability are not threatened and is therefore flawed. An upward only review would preclude changes to reflect more challenging viability and deliverability. The process for the review is unclear and it is inappropriate for this to be deferred to supplementary planning documents which are required to be consistent with development plan policy but are not part of the development plan.

2. **Part H** refers to scheme amendments being excluded from the FastTrack approach if the original permission did not meet the required threshold, tenure or other considerations. In practice such an approach is likely to deter the development industry from making amendments to consented proposals and thereby hindering the effectiveness of the plan. Proposals which potentially increase the number of homes and jobs which help to deliver the overall objectives of the plan could be abandoned. The consented position, including the proportion and tenure of the affordable housing, is a significant material consideration and the focus should instead be on scrutinising the uplift or change in a scheme rather than the overall viability.

User: PRP

The drive from the Mayor to increase the provision of affordable housing across the capital is welcomed by PRP. Access to cheaper forms of housing is vital if London is to retain its status as a global city.

The threshold approach as set out in policy H6, as already established in the Affordable Housing SPD, is welcomed in providing clarity to developers who would like to avoid a protracted viability route for any application. However, it is noted that in part B of policy H6 it states that the 35% threshold will be reviewed in 2021 and if necessary reviewed through supplementary planning guidance (SPG). This statement causes uncertainty around the future of the threshold approach which is not helpful to providers of housing currently developing longer term investment strategies for the capital. Furthermore, a change in SPG would not have the effect of successfully altering the thrust of policy H6 which would remain in place and a conflict would therefore be created in planning policy terms.

It is requested that further clarity is provided by the Mayor on the future of the threshold approach as set out in policies H5 and H6.

User: One Housing Group

Draft policy H6: ‘Threshold approach to applications’

OHG welcome the Mayor’s strategy to seek to provide greater certainty about the approach to affordable housing, which is largely set out in draft policy H6 (Threshold Approach to Applications). However, there are significant concerns that the following aspects of the draft policy are unsound:

a. **Part B** states that the threshold approach will be reviewed in 2021 and, if appropriate, increased through supplementary planning guidance. Such an approach is flawed and is inconsistent with the NPPF (paragraph 173) which requires the scale of obligations to be considered to ensure that viability and deliverability are not threatened. An upward review only would preclude changes to reflect more challenging viability and deliverability. The process for the review is unclear and it is inappropriate for this to be deferred to supplementary planning documents which are required to be consistent with development plan policy but are not part of the development plan.

b. **Part H** refers to scheme amendments being excluded from the FastTrack approach if the original permission did not meet the required threshold, tenure or other considerations. In practice such an approach is likely to deter the development industry from making amendments to consented proposals and thereby hindering the effectiveness of the Draft Plan. Proposals which potentially increase the number of homes and jobs, thereby helping to deliver the overall objectives of the Draft Plan, could be abandoned. The consented position, including the proportion and tenure of affordable housing, is a significant material consideration. The focus should instead be to apply scrutiny to the uplift or change in a scheme and not the overall viability.

User: Persimmon Homes

Elements of the policy are unsound because they are unjustified and ineffective.

The Affordable Housing SPG established a minimum rate of 35% affordable housing and introduced early and late review processes. As detailed above, it is very difficult to guarantee at least 35% affordable housing against the Mayor's preferred tenure split as well as full policy compliance in all other areas.

It is considered that the Policy fails to recognise the different circumstances that existing within London. As part of the London Local Authorities review of their affordable housing policy, it is considered that they should have the ability to set a lower threshold for the 'fast track route'. We recommend the following change to Part b 1):

The threshold level of affordable housing is initially set at:
1) a minimum of 35 per cent unless a lower threshold is established by a London Local Authorities in their development plan.

We recommend the following change to Part C 3):
"meet other relevant policy requirements and obligations where feasible and viable to the satisfaction of the borough."

We share the HBF's concerns that Part B is unsound because it is inconsistent with national policy. The Mayor cannot introduce new policy, or a revision to existing policy, through SPG. Notwithstanding this, it is considered that this stated intention to review and potentially increase the threshold gives rise to further uncertainty. This is considered unhelpful at a time when the housing industry is being encouraged to further increase investment and delivery.

Part E 2) is unsound in terms of early and late stage viability reviews because it conflicts with the Government's advice in its national guidance.

We share HBF's concerns that the requirement for early and late viability reviews for all schemes not meeting the threshold is contrary to NPPG advice.

Paragraph 4.6.11 Existing Use Value Plus

Persimmon recognises the benefit of adopting standard approaches to valuation methodology and benchmarking land values. However, such a prescriptive approach does not accord with the guidance set out in the NPPF (Para 173). We share the HBF's concerns regarding the Mayor's direction that Existing Use Value Plus (EUV+) is the presumed approach to determining benchmark land value (BLV).

The NPPF requires plan-makers to ensure viability which includes the need to "provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable". The NPPF is not being prescriptive as to the appropriate model to test viability and nor should the London Plan.

What constitutes an acceptable 'plus' is not clear in the London Plan and as such is open to interpretation. It should be recognised that landowners need to have an incentive / premium to release their land for development. There are localised and other factors that establish what this premium. London is a large geographic area with widely different land and development values.

The Mayor cannot stipulate EUV+ as the basis for assessing scheme viability and should adopt a more flexible approach.

User: Blackheath Society

Policies H5 Delivering affordable housing; H6 Threshold approach to applications; H7 Affordable housing tenure; and H8 Monitoring affordable housing: We support the introduction of these policies and the thrust of the draft supporting text. As noted earlier in connection with Policy D8, we believe there should be a much higher level of transparency/accountability in relation to viability assessments to enable informed debate with interested parties other than the local authority. We strongly support Policy H7 on genuinely affordable housing and in particular the treatment of London Affordable Rent at Policy H7A1 and paragraph 4.7.4. We welcome the prospect of compliance with affordable housing targets being monitored more rigorously than has been the case to date.

User: Kesslers Stratford Limited

Kesslers welcomes the Mayor's strategy to seek to provide greater certainty about the approach to affordable housing, which is largely set out in Policy H6 (Threshold Approach to Applications). However, they are concerned that aspects of the policy could potentially be unsound.

Part B states that the threshold approach will be reviewed in 2021 and 'if appropriate' increased through Supplementary Planning Guidance. Such an approach is flawed and is inconsistent with the NPPF, where paragraph 173 requires the scale of obligations needs to be considered to ensure that viability and deliverability are not threatened. An upward only review would preclude changes to reflect more challenging viability and deliverability considerations and therefore the review should not be restricted in this way. The process for the review is unclear and it is inappropriate for this to be deferred to Supplementary Planning documents which are required to be consistent with development plan policy but are not part of the development plan.

Draft Policy H6 should also be **revised** to exclude the requirement for Locally Significant Industrial Sites and other industrial sites to be subject to a 50% rather than 35% affordable housing threshold. There is no justification for the higher threshold in terms of delivery or viability. We can find no viability evidence in the London Plan Viability Study (December 2017) to justify why such sites should the subject of a higher 50% affordable housing threshold. By their very nature these sites are expensive to redevelop because they have been previously developed. They typically lack infrastructure and amenities required for residential use which need to be provided as part of the proposals. A default position of 50% affordable housing on these sites will only make delivering new development on them more difficult. In this respect the plan has not been 'positively prepared' and should be revised.

User: Barnet Society

Para 4.6.5

We support the Mayor’s belief that public sector land can play a significant role in meeting affordable housing need, and would like to see such developments giving priority to key public service workers. But the definition of ‘affordability’ in the Glossary is insufficiently robust.

User:	Clarion Housing Group

Clarion has commented in detail on the threshold approach in our submission on the Mayor’s Housing Supplementary Planning Guidance (SPG): The recently established London Housing threshold approach conditional on percentage of affordable homes appears to be working at the strategic scale, with greater transparency over the viability mechanisms. Whether it provides a fast track route is yet unclear and there still needs to be recognition that land values will need to adjust.

The application of the approach does vary across individual Boroughs who need to make clear to developers what is expected and then not to deviate from that position.

User: Clarion Housing Group

Clause H6-I

“Any proposed amendments that result in a reduction in affordable housing, affordability or other obligations or requirements of the original permission should be rigorously assessed under the Viability Tested Route. In such instances, a full viability review should be undertaken that reconsiders the value, costs, profit requirements and land value of the scheme.”

It is acceptable that reductions in the agreed amount of affordable housing subject to grant should be re-assessed, and if the scheme is large enough, be referred to the Mayor. However the wording of Clause H6-I to include other obligations or requirements of the original permission is onerous, especially if the suggestion that a full viability review would be required.

Clause H6-I Delete: *other obligations or requirements of the original permission*

User: Dagenham Dock Limited

Draft Policy H6 – Threshold approach for Affordable Housing

Draft Policy H6 establishes a threshold approach to affordable housing for development proposals delivering 10+ dwellings or more than 1,000 sq.m of development. The thresholds established are i) a minimum of 35%; ii) 50% on public sector land; and iii) 50% for Strategic Industrial Locations, Locally Significant Industrial Sites and other industrial sites deemed appropriate for release for other uses.

DDL strongly object to the 50% threshold established for former industrial land. Para. 4.6.6 states that the higher level of affordable housing provision is required due to the difference in values between industrial and residential development. However, Draft Policy H6 and the supporting text at para. 4.6.6 pays no regard to the extensive costs often associated with the clearance and remediation of industrial sites which have been subject to previous contaminating uses. For example, and in the case of DDL's Dagenham Dock asset, DDL are currently engaged in the UK's largest demolition and remediation contract in 2017 – incurring significant costs prior to the planning and development process. This is a significant consideration, particularly as part of the remediation costs are associated with the restoration of the land to levels which are considered acceptable for 'vulnerable' residential uses and Human Health criteria. This level of remediation is beyond that required for a replacement industrial use which should be factored into the consideration of affordable housing viability on the assessment of development proposals.

In the case of DDL's Dagenham Dock site, understandably due to the significant remediations costs, requirement to provide a secondary school, heritage centre and substantial open space, in an area on the lower scale of sales values in London, meeting the 35% target will be a significant challenge and may not be deliverable. Raising the threshold to 50% would result in an entirely unreasonable level. DDL would without question be forced down the 'viability tested route', whereas the existing 35% threshold defined within the London Plan Homes for Londoners SPG (2017) offers a more realistic target for the fast track route.

In light of the above, DDL is supportive of para. 4.6.3 which advises that the Boroughs may wish to consider a localised affordable housing threshold in Opportunity Areas for the Fast Track Route or fixed affordable housing requirements. This approach would provide developers with certainty. However, for this approach to be honoured by the GLA in later pre-application submissions and referable schemes; DDL encourages the GLA to include a specific clause of this nature within Draft Policy H6.

User: Aitch Group

My client will always seek to achieve the Mayor's minimum 35% threshold on all sites. However, that can be extremely difficult to achieve. We would suggest that the Mayor relook at the wording of this policy to provide more flexibility, particularly in relation to tenure split, which in some circumstances, may make this target easier to deliver.

My client does not support the Mayor's suggestion for delivering 50% affordable housing on Strategic Industrial Land/ other industrial sites.

In many instances, such sites are the most challenging to deliver affordable housing because by their nature they are often in very low value areas. Affordable housing delivery should be treated on a case by case basis and subject to maximum reasonable levels of provision taking account of the target 35% threshold approach.

The Mayor needs to be more pragmatic if the development of such sites is going to make a critical contribution towards London's housing targets.

User: DTZ Investors

Policy H5: Delivering affordable housing & Policy H6: Threshold approach to applications

It is accepted that affordable housing from residential and mixed-use developments should generally be sought on-site [as long as the mixed use development includes residential provision that triggers an affordable housing requirement in itself]. However, the requirement of part B of draft Policy H5 that affordable housing should be delivered on-site does not acknowledge that it is not always practicable or viable to secure mixed tenure housing provision within mixed use schemes on constrained sites, particularly in central London.

The policy also does not recognise that development proposals in central London can often secure more and better quality affordable housing through off-site provision, through development in the vicinity of the application site, or elsewhere if funded by a contribution in lieu of provision. As off-site delivery of affordable housing is relatively common in central London, it is considered too inflexible for Policy H5 to allow off-site provision or a contribution in lieu of provision only in exceptional circumstances.

In seeking to deliver affordable housing under draft Policy H5, serious concern is also expressed that the accompanying draft policy H6 sets a threshold level for affordable housing provision at 50% for Strategic Industrial Locations (SILs), Locally Significant Industrial Sites (LSIS) and other industrial sites deemed appropriate to release for other uses, in order to benefit from the Mayor's Fast Track Route (whereby applications for major residential developments are not be required to submit viability assessments for review).

Policy E7 of the draft London Plan, advises Development Plans and planning frameworks should consider "whether certain logistics, industrial and related functions" in selected parts of SILs and LSIS "could be intensified and/or co-located with residential and other uses, such as social infrastructure, or to contribute to town centre renewal." However, critical to this approach is the requirement of Part E of the policy for "an increase (or at least no overall net loss) of capacity in terms of industrial, storage and warehousing floorspace with appropriate provision of yard space for servicing."

The requirement for redevelopment schemes within SIL or LSIS to retain or increase industrial, storage and warehousing floorspace and provide service yards, presents a significant constraint for redevelopment of these sites, with the need for careful design to accommodate these employment uses alongside residential development and the need for yard areas inevitably reducing the level of market housing that can be delivered on site, with a significant impact on viability for redevelopment. Additionally, active and passive extensive noise mitigation measures for SI

L and LSIS site will be required to ensure industrial activities are not compromised by residential development in accordance with to the ‘Agent of Change Principle’ to be followed under draft Policy D12.

Coupled with the likelihood that housing on sites alongside industrial uses is also likely to secure lower revenues for developers than in established residential areas, the effect of these measures will inevitably make redevelopment of these sites more challenging and squeeze the viability of redevelopment schemes, which could compromise the development of emerging new communities and the regeneration of areas (in particular Opportunity Areas with substantial levels of protected industrial land).

The basis for setting of a 50% affordable housing requirement for proposals on Strategic Industrial Locations, Locally Significant Industrial Sites and other industrial sites to benefit from the Fast Track route (without the need for a viability assessment) instead of the 35% for development of all land not in public ownership will be likely to mean that all major schemes for redevelopment of these sites are likely to require viability appraisals to demonstrate how this level of affordable housing provision cannot be achieved. This requirement is likely to significantly to slow up the determination of planning applications (and add significant costs) and in turn delay the delivery of new housing and employment. The effect of this approach will be particularly felt in Opportunity Areas, which are expected to contribute to the delivery of circa 87% of the total housing in London over the next 10 years. (568,000 of 650,000 units) and thus the proposed policy could compromise achieving the Mayor’s ambitious proposed housing targets.

Change Sought – It is requested that draft Policy H5 provide greater flexibility by explicitly recognising that within inner London off-site affordable housing provision may be considered acceptable where it can be demonstrated that this would lead to an improvement to the quantity or quality of affordable housing provision compared to that which might be practically and viably achieved on-site. Recognition should also be made to a payment in lieu of provision being deemed acceptable where either on-site or off-site provision is not practicable or viable.

It is also requested that Part (B)3 of draft Policy H6 be deleted to remove reference to a threshold level of affordable housing for residential development of Strategic Industrial Locations, Locally Significant Industrial Sites and other industrial sites being set at 50% in order to benefit from the Mayors Fast Track Route, in favour of applying the 35% threshold to all land not in public sector ownership.

User:	London Borough of Ealing

The Council supports these policies which are largely based on the previously published Affordable Housing and Viability Supplementary Planning Guidance (SPG), August 2017.

User: EC Properties LP

Capco is fully committed to engaging with the Mayor and GLA officers in relation to a review of the approved Earls Court Masterplan, to deliver more homes and, in particular, more genuinely affordable homes. Additionally, Capco, as appropriate, is willing and able to assist in the formulation of the London Plan approach to Opportunity Areas, high density and design/development standards. Some general comments and observations in this respect are set out below:

Affordable housing threshold approach in Opportunity Areas: The supporting text to Policy H6, at paragraph 4.6.13, recognises that a different affordable housing threshold approach may be appropriate for Opportunity Areas. Capco considers this to be essential given the very challenging nature of most Opportunity Areas and the priority to be afforded to the funding of infrastructure necessary to enable development to come forward. However, Capco is concerned that the approach taken by paragraph 4.6.13, as currently drafted, only envisages a ‘flex’ upwards – above 35% (or 50% in respect of public land). This is concerning and Capco questions the logic of what is proposed. For Opportunity Areas there ought to be the ability for a bespoke threshold to be set (above or below the threshold levels currently stated) that responds to the specific viability considerations of individual Opportunity Areas (including other public benefits), where this can be appropriately and robustly evidenced.

User: EC Properties LP

Capco is fully committed to engaging with the Mayor and GLA officers in relation to a review of the approved Earls Court Masterplan, to deliver more homes and, in particular, more genuinely affordable homes. Additionally, Capco, as appropriate, is willing and able to assist in the formulation of the London Plan approach to Opportunity Areas, high density and design/development standards. Some general comments and observations in this respect are set out below:

Viability reviews: Policy H6 and paragraph 4.6.12 set out the Mayor's approach to viability review mechanisms. On major, complex regeneration projects – such as the ECWKOA – reviews should be downward as well as upward, recognising the significant risk of such projects and the need to respond to economic cycles.

User: Peabody

As detailed in our response to the Affordable Housing Supplementary Planning Guidance, we support the use of a threshold approach. Increasing the supply of affordable housing is one of our strategic goals and proposals to reduce the level of information required from developers who commit to a higher proportion of affordable homes is welcome, particularly an exemption from the need to submit viability information for schemes which deliver above 35%. We believe developers will soon start to actively consider this new approach in their assessment of bids for land and applications for planning.

We also welcome the inclusion of Build to Rent to the Fast Track Route, presuming they meet the affordability requirements.

While we do not necessarily oppose the proposal to permit greater flexibility in viability assessments Opportunity Areas, we are considered that this could have a negative impact as uncertainty can lead to higher land prices.

User: Ballymore Group

Policy H6 – Affordable Housing Threshold Approach

The 50% affordable housing threshold for Strategic Industrial Locations, Locally Significant Industrial Sites and other industrial sites deemed appropriate for release for other uses is a highly onerous one that will in Ballymore's view be extremely difficult to achieve from a viability perspective.

The justification for this requirement appears to be predicated on the difference in values between industrial and residential development. However, this presumption fails to acknowledge that many industrial sites have been acquired for their redevelopment potential prior to the formulation of this draft policy and on the basis that other strategic and local policy documents supported their regeneration in principle for residential or other uses. Whilst it is appreciated that this could be interpreted as developer risk it must also be considered a practical challenge in ensuring that a viable redevelopment scheme can come forward during the lifetime of the Plan.

By complying with Policy E4 (C) of the draft London Plan developers will already be required to ensure no net loss of industrial floorspace on their sites. To implement the intensification and co-location approach set out in Policy E7 it would be necessary for any developer to finance more complicated and often expensive scheme designs that successfully intensify the replacement business uses on a smaller area of the site (often with a poor rental return versus the level of investment required). Design and construction costs would be further increased by the need to ensure an appropriate relationship between the replacement business uses and new residential homes on the site and the responsibility for mitigating impacts from existing noise-generating activities in line with Policy D12 (Agent of Change).

Poor quality and underused industrial land provides the greatest opportunity to deliver large-scale genuine mixed use schemes. If it has been identified through a plan-led process or as part of a co-ordinated masterplanning exercise that an industrial site is underperforming and would benefit from intensification then it is considered unreasonable for a potential developer to also accept the burden of a complicated and expensive mixed use development alongside a 50% threshold requirement for affordable housing. Ballymore feel that this will either a) discourage intensification as a tool for regeneration or b) de-incentivise developers from seeking the Fast Track Approach. This would result in either the continued decline of existing floorspace through underperformance or a missed opportunity in terms of on-site affordable housing delivery.

Ballymore therefore suggests that Part B (3) of Policy H6 is removed from the Plan so that a 35% minimum threshold applies to industrial sites (including SIL, LSIS, and non-designated industrial sites).

User: Ballymore Group

Policy H6 - Fast Track Approach of the Threshold Approach

Viability discussions throughout the course of a planning application can result in lengthy delays to the planning process and subsequently the delivery of housing. Ballymore therefore strongly support the Mayor's concept for a Fast Track approach in Policy H6 whereby a viability assessment is not required to be submitted provided certain criteria are met. However, the criteria that needs to be met in order to follow the Fast Track Route (as outlined in Policy H6(C)) is difficult to achieve and will limit the number of applicants being able to benefit from this approach.

Ballymore are supportive of the need to meet or exceed relevant threshold levels of affordable housing and be consistent with the relevant tenure split outlined in Policy H7 in order to benefit from the Fast Track Route. However, Part 3 of the criteria to require applications to *'meet other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor'* is a highly vague and easily exploited criterion given the wide breadth of planning policies applicable to any particular scheme. There are few planning application schemes that achieve full compliance with all relevant planning policies and Ballymore believe that this fact will enable Boroughs to conclude that the requirements for eligibility to the Fast Track Approach route have not been met and that a full viability assessment is required.

In the interests of ensuring efficient housing delivery we therefore recommend that Part C (3) of Policy H6 is removed so that residential schemes which seek to deliver the minimum affordable housing threshold and relevant tenure split can benefit from the Fast Track route.

User: Ballymore Group

In respect of industrial lands the 50% affordable housing threshold for industrial lands, to be intensified through a plan-led approach, will in the majority of cases prove to be unviable and prevent the unlocking of land for redevelopment. Ballymore also contend that the overly restrictive wording of certain policies may deter local authorities (or provide them with an excuse) from fully investigating the potential for intensification of industrial lands within their area, thereby impacting significantly on housing delivery. This concern is exacerbated by considerable ambiguity within policy wording as to how the plan-led approach to intensification, co-location and substitution of industrial land should take place.

The representation also highlights further potential issues of implementation and delivery in respect of the affordable housing Fast Track Approach, which is currently too loosely worded and potentially ineffective, and the requirements for re-provision of low-cost business space and affordable workspace.

User: Unite Students

Threshold Approach to Applications - Policy H6

The threshold approach applies to development proposals which are capable of delivering more than ten units or which have a combined floor space greater than 1,000 sqm and sets the threshold level of affordable housing at a minimum of 35 per cent. The 35 per cent threshold will be reviewed in 2021 and if appropriate increased through Supplementary Planning Guidance. It is not clear whether this policy applies to student accommodation, however, in-case there is an intention to apply Policy H6 we provide supporting evidence **as set out in Appendix C 'Representations to the London Plan prepared by James. R Brown and Co'.**

Proposed London Plan Policies H6, H13, H15, H17 and H18 are not justified by robust viability evidence because the evidence in the London Plan Viability Study ('LPVS') is fundamentally flawed and/or wrong. We assume that there is an onus on the GLA to provide appropriate evidence to justify the proposed London Plan policies and that, where this evidence is missing or lacking, the consequence will be (or should be) that the proposed policy cannot be adopted.

The London Plan Viability Study ('LPVS') is fundamentally flawed and/or wrong because:- (N.B. We refer to the main body of the LPVS as the LPVS and its accompanying Technical Report as the LPVSTR below).

a) Support or Inform:-
Para 1 of the LPVS Executive Summary says its purpose is to 'support' the new London Plan. However, this implies a fait accompli as surely the main purpose of the LPVS should have been to 'inform' the potential policies in the new London Plan.

As the LPVS is dated December 2017, it would not seem credible that the proposed new London Plan policies were generated almost immediately thereafter. Para 1.2.4 of the LPVS suggests that consultation on the proposed London Plan started at the end of November which pre-dates or almost coincides with the LPVS.

The LPVS appears to have been written to support pre-determined policies in the new London Plan rather than inform policy making which is in-appropriate and undermines its credibility as ‘evidence’.

b) Intervention & Justification for 35%:-
Whilst planning policy has been intervening in the affordability and consequential value of housing for some years now, is this fundamentally legal and/or a planning policy matter? What part of what law permits and/or promotes this?

c) Data Sources, Analysis and Non-Ascertainable Logic through to Conclusion:-
The LPVS/LPVSTR is a very thin on data, detail and analysis.
We have regularly seen more substantial viability reports relating to a single site.
There is no clear audit trail from data to conclusion, especially as there are no explicit financial viability appraisals provided. As such, the LPVR does not represent evidence.

d) Incorrect and/or Misrepresented Data:-
We are familiar with the Savills forecasts on page 16 of the LPVS but the LPVS fails to clarify that these forecasts do not apply to ‘new build’ which London Plan policies are aimed at. Furthermore:-

? the forecasts listed on page 16 of LPVS are already out of date as most of the cited forecasters have since pegged back their growth forecasts, and;
? the LPVS fails to use ‘independent’ data sources rather than estate agent forecasts (who might wish to avoid gloomy predictions). Forecasts from independent bodies (e.g. MOLIOR) should feature.

Assuming the LPVS has used incorrect and/or has misrepresented base data such as this throughout, the LPVS is not professionally reliable.

Build Costs:-
Although the build cost rates are reported to have been produced by Turner & Townsend, this is not evidence in itself. Detailed comparable contract evidence is surely needed to justify these rates to represent ‘evidence’.
In our experience the build cost rates suggested by Turner & Townsend are un-realistically low even if they relate to total scheme GIAs (which the LPVS fails to clarify). If they relate to NIAs The LPVS needs to provide extensive and explicit evidence regarding build costs as, at the moment, the build cost rates used are unclear and un-substantiated.

f) Model:-
Although one cannot see any of the financial viability assessments that we assume the authors of the LPVS have prepared using the Three Dragons/GLA Toolkit, we question why the authors (i.e. The Three Dragons et al) have used the Three Dragons/GLA Toolkit software bearing in mind the vast majority of viability consultants (acting for either Councils and/or applicants) dispensed with this as an inferior model several years ago.
Independent reviews of the Three Dragons/GLA software (e.g. by BNP Paribas) have previously confirmed that it is inferior to software such as ARGUS, so why use it?
We fully expect the appraisals prepared by The Three Dragons et al in the LPVS to contain ‘error equivalents’ as a consequence of the software used which undermines its conclusions.

g) General Approach to Viability Testing:-
The LPVS makes no reference to (and does not appear to have given any consideration to) the RICS's Guidance Note 94/2012 (Financial Viability in Planning).
The RICS has been the pre-eminent professional institution representing the UK property and development industry for many decades. To evade guidance provided by the RICS ignores input from most of the UK development industry which is not reasonable and questionable.
Charles Solomon (now head of viability at the GLA) was part of the Core Working Group that produced the RICS GN 94/2012 and so one would reasonably expect viability studies instructed by the GLA to consider it.

h) Approach to BLVs (echoing the Mayor's Affordable Housing SPG and referred to in notes to proposed London Plan Policy H6):-
The approach used within the LPVS to derive BLVs is misguided and the evidence used is not evidence.

In our opinion, the RICS's guidance on arriving at BLVs as set out in their GN94/2012 is well thought through and reasonable, albeit unavoidably open to some criticism.
However, certain stakeholders in the planning system are seeking to dismiss the RICS's guidance in favour of guidance within the Mayor's Affordable Housing SPG which is open to a lot more criticism.

There is no perfect approach and cannot be for a variety of reasons. The LPVS has heeded the Mayors guidance on viability and therefore inevitably concludes what the Mayor's Affordable Housing SPG promotes. This is a major problem as the required approach to viability within the Mayor's Affordable Housing SPG is echoed within the proposed London Plan (particularly via H6 and Sections 4.6.1 to 4.6.15)

We have already made representations on the Mayors Affordable Housing SPG and its viability guidance and we would re-iterate everything we said therein (see Appendix A). Via the new London Plan, we feel the Mayor is in-appropriately seeking to politically intervene in the free market via the planning system by unduly influencing/directing how Benchmark Land Value ('BLVs') should be arrived at (whereupon the required approach is also poorly defined). We think the Mayor's guidance needs to be less prescriptive.

Via Section 4.6.10, 4.6.11 in the proposed London Plan plus the Mayor's SPG and the LPVS/LPVSTR, the narrative is in danger of practically enforcing the use of 'EUV plus a land-owner's premium' ("EUV Plus") as the only acceptable approach to BLVs. The Mayor and the proposed London Plan (including numerous references to the Mayor's Affordable Housing SPG) effectively supress Alternative Use Value ("AUV") and/or Market Value (as defined by the RICS in their GN 94/2012) as an approach to BLVs.

In reality, land values are ultimately determined by the market and prospective vendors of land will always consider AUVs and Market Value before selling. Meanwhile, purchasers of development land will usually seek to minimise what they need to pay for development land and so it would be wrong to assume that they readily over-pay.'EUV Plus' is poorly defined compared to the extensive/clear definition and explanation
provided by the RICS for Market Value in their GN 94/2012. AUV is also poorly defined but is effectively a component of Market Value.

With respect to EUV Plus, the key question is what the 'Plus' bit should be? For no apparent or logical reason, the GLA and their supportive consultants keep pointing to '20%' on numerous projects we have worked on but this is arbitrary. It also makes no sense whatsoever on sites that are cleared but have obvious 'alternative use' potential.

The Mayor’s Affordable Housing SPG says that land-owner’s premiums “could be 10 per cent to 30 per cent, but this must reflect site specific circumstances and will vary”. This Mayoral SPG wording is in danger of being interpreted to mean land–owner’s premiums should or must be 10% to 30% which is highly problematic and in-appropriate. We think the London Plan needs to absolutely clarify this if the EUV Plus approach is to be endorsed as the preferred approach (and/or used as alternative terminology for Market Value as defined in the RICS’s GN 94/2012).

In reality, the ‘Plus’ percentage or sum (as there is no logic to suggest it should ever be any particular percentage) will or should take the BLV up to the sum that is equivalent to Market Value (as defined by the RICS in their Guidance Note GN 94/2012, as opposed to the ‘Red Book’, and whereupon full regard to planning policy must underpin development land purchaser prices). This may well be via the identification of alternative use development potential.

Some people point to ‘Parkhurst’ as important appeal case precedent on the topic of BLVs.

At the Parkhurst appeal (APP/V5570/W/16/315698) the Inspector considered an SVB of £6.75m to be reasonable even though the EUV was negligible or, at best, up to £700,000. Whatever terminologies one wants to use, the Inspector effectively considered a BLV equivalent to EUV plus 868% as reasonable. This confirms that it is not appropriate or reasonable for the Mayor or any Council to try and claim that a land-owner’s premium should be 20% or within the range of 10% to 30%.

The Mayor's Affordable Housing SPG requires that landowner premiums are justified and yet, ultimately, there is no way of justifying any particular landowner premium (be it zero, 20%, 300% or £3m) without some kind of reference to land transaction evidence as it is otherwise arbitrary. Whilst the Mayor's SPG indicates that the level of premium can be informed by benchmark land values that have been accepted for planning purposes on other comparable sites, we do not think this is reasonable. It would not necessarily mean a 20% premium (for example) is reasonable just because 20% was agreed (by way of an incidental 'equivalent' percentage) on a neighbouring site. Firstly, it may not have been 'agreed' but rather accepted under protest and, secondly, it would be equally reasonable to suggest that if a BLV equivalent to £10m per acre was agreed on a neighbouring site, that £10m per acre should be applied to the subject site – whether this equates to a premium over and above EUV of 20% or indeed 300%. In other words, references to and/or the application of land-owner's premiums via 'percentages' is in-appropriate and the London Plan should clarify this.

Furthermore, AUVs (which are effectively a component of Market Value) should not be supressed by the wording of the proposed London Plan policies and/or by its references back to the Mayor's Affordable Housing SPG. The London Plan should support the use of an AUV and/or Market Value approach where the subject site is cleared (i.e. with no physical existing use thereon). N.B. We are currently working on a cleared un-contaminated 3.8 acre site in an urban centre in a south-eastern London Borough where a prolific viability consultant to London Boroughs and the GLA is seeking to apply a BLV of £1 based upon EUV Plus. In practice, this is where EUV Plus can lead (i.e. to a nonsense).

A BLV is the most crucial assumption within financial viability assessments and yet contention still exists with regard to how these should be reasonably derived.

There is no meaningful, logical or reasonable evidence supporting the Mayors guidance to viability. The RICS is apolitical and is surely the appropriate body to provide guidance in this regard.

Returning specifically to the LPVS/LPVSTR, this seeks to use BLVs agreed on certain planning consents by alleging that BLVs in associated S.106 Agreements (e.g. within review clauses) were 'agreed'.

We believe most of the LPVS BLV examples cited in Annexe J to the LPVSTR are connected to one particular viability consultant who only act for certain Boroughs and who will not negotiate on their approach to BLVs at local level (i.e. effectively EUV Plus only). However, we were involved in some of those projects where we know the BLVs were/are not agreed and that the applicant was practically force fed the EUV Plus approach by the Councils advisor (with the Mayor's SPG in the background) and where the 'Plus' bit has typically been 20% without evidential justification. In some cases, this has led blighted and un-implementable consents. Furthermore, there are only 35 BLV examples relied upon by the LPVS in Annexe J across only 13 London Boroughs. This is a completely deficient sample size and a fundamental flaw which undermines the LPVS.

Para 2.1.12 in the LPVS confirms that land values (and therefore BLVs) "should be informed by comparable, market-based evidence but excluding transactions above the norm". The LPVS does not present and has not considered any true comparable market-based evidence. This should reasonably include actual development land transaction evidence and analyses thereof.

i) Profit:-
Para 2.5.6 of the LPVS says its viability testing assumes a 'private developer'.
Clearly, the identification of reasonably necessary profit targets to private developers is therefore crucial to determining viability.
The LPVS states at Para 2.5.4 that "residential values and profit targets have been compiled by Housing Futures Ltd".

Having sought to establish what experience Housing Futures Ltd have with regard to residential values and profit targets, there is very little information available on the internet and we cannot find their web site. It appears that Housing Futures Ltd may be a person called Peter Redman who, some internet references say, has 'worked in social housing for 40 years' including a number of housing association and local authorities.

With respect, we are concerned that 2 crucial assumptions (i.e. profit targets and values) that are fundamental to the LPVS's conclusions and London wide planning policy have been 'compiled' by a consultancy that might not have sufficient experience in this regard. Furthermore, it is not clear what 'compiled' means in context. Have they determined what reasonable profit targets are?

The LPVS makes no mention of having gathered any evidence from Banks, financial intermediaries, equity and mezzanine financiers/funders with regard to what they need to see as prospective development profits in order to satisfy their conditions precedent to lending across a variety of property types and development risk profiles. If this evidence has not been obtained and considered as part of the LPVS, the LPVS cannot be credible as, without funding, development cannot happen.

At the moment, we are not convinced that sufficient evidence has been obtained and analysed to determine what a reasonable/necessary development profit is across the various housing, quasi-housing and mixed-use development projects considered within the LPVS because it is not apparent.

j) Finance Costs:-
Table 5.15 (page 34) in the LPVS indicates that the GLA have instructed the authors of the LPVS what finance rates to use. Surely the authors of the LPVS should produce evidence and express a justified opinion in this regard? This is not evidence.

Although Table 5.14 suggest that the GLA have evidence to support the instructed finance rates, we have looked at ‘The Value, Impact and Delivery of Community Infrastructure Levy’ (University of Reading, Three Dragons, Smiths Gore and David Lock Associates – Feb 20127) for example but see nothing in there that represents evidence to support any particular finance rate assumption.

Our experience of finance rates to the average hypothetical developer is that they are significantly higher than the GLA are suggesting including finance facility fees (which should not be ignored). Up to date explicit evidence is required regarding finance cost assumptions before the LPVS can be considered credible in this regard.

With respect to footnote 50 on page 34 of the LPVS, it is not appropriate to spread land finance costs over half the development period as professional development valuers would confirm. It is usually reasonable to spread finance costs on construction in this way because construction costs are indeed spread over the development period. However, finance costs on land compound from the day of purchase and usually continue compounding until the end of the development (or close to) unless the development is substantially phased (which is rarely the case with student accommodation development). This indicates that, in all likelihood, the results from the LPVS’s viability testing of their 2 student development archetypes are wrong for this reason alone.

In conclusion, finance rate/cost assumptions significantly affect viability tests and yet the LPVS provides no evidence in support of its assumed rates/costs and has also applied them incorrectly with respect to land finance. This undermines the LPVS’s conclusions regarding student accommodation development.

Proposed London Plan Policy H17 should not be adopted for this reason.

k) Transparency & Financial Viability Assessments:-

The LPVS/LPVSTR needs to provide the explicit financial development appraisals that must have been prepared to arrive at viability testing results.
Without these, one cannot reasonable scrutinise the workings behind the LPVS.

l) Review Clauses:-

If Policy H6 applies to student accommodation development and review clauses will end up being required on viability tested schemes that do not offer 35% affordable housing as a consequence of the London Plan, this would be unreasonable, unjustified and in-appropriate because:-

? The LPVS is fundamentally flawed for a number of reasons identified above and so 35% is not justified by evidence to start with, and;

? Evidence demonstrating that review clauses are not prejudicial to the fundability of development has not been provided and has not been properly considered (if at all). In earlier London Plans, review clauses were only considered appropriate on long term phased development projects and nothing has occurred since to warrant any deviation from that approach, and;

? Sound advice from the RICS (in their GN 94/2012) indicates that, for short term projects, review clauses are not appropriate and, for longer term phased projects, only pre-implementation reviews are appropriate. There is no evidence or ultimately constructive sense to have ‘near end of development’ reviews on short term projects and no need for pre-implementation reviews if a viability exercise has just been gone through. Review clauses are a serious threat to development especially as the GLA will combine them with un-realistically low BLV references. Although some review clauses have been agreed in what has been a rising market over recent years, we think these are in danger of seriously blighting development over the next few years where growth is not forecast, and;

? Banks, equity and mezzanine development financiers/funders need to be consulted directly, independently and comprehensively to establish what they will do if review clauses coupled with low BLVs become the norm. This is an imperative but has not apparently been done, and;

? Review clauses will seriously damage the ability to fund schemes as, in particular, loan security valuers will not be able to demonstrate adequate loan to value cover and risk cover.

WITHOUT PREJUDICE
23rd February 2017
Dear Sirs,
COMMENT ON THE DRAFT AFFORDABLE HOUSING & VIABILITY SUPPLEMENTARY PLANNING GUIDANCE (SPG).
Introduction:-
My views herein are on behalf of; James R Brown & Company Ltd and all past/present/future clients whether they are planning applicants or Boroughs.
We mainly act for planning applicants but occasionally act for Boroughs.
I have been appraising the viability of development projects for approaching 30 years and I am a qualified RICS Registered Valuer. I have also been directly employed by property development companies in the past.
Over the last 5 years (i.e. since the demise of Housing Association Grant), I estimate that I have produced viability reports for planning purposes on over 350 projects in London ranging from a two house scheme up to individual projects with Gross Development Values approaching £1bn (e.g. Whiteleys, W2).

Affordable housing provisions have been agreed at local level on about 98% of those projects following scrutiny of my reports by independent viability consultants. On average, the vast majority of those projects ended up with significantly less than 35% affordable housing but more than the 13% referred to in Section 1.2 of the SPG.

General Response to the SPG:-

a) The current system of negotiating affordable housing provisions on a site specific basis often involves numerous debates/issues but it is the optimum reasonable system in so far as Section 106 ("S.106") is capable of delivering affordable housing.

b) Whilst greater certainty in development would theoretically be welcome, any quasi fixed affordable housing percentage (especially a high one like 35%) will eliminate numerous potential sites which can only come forward viably with less than 35% affordable. Recent history tells us that this is indeed most sites (hence the recent 13% delivery quantum referred to within the SPG).

c) Although, the SPG does not prevent viability representations being submitted for schemes with less than 35% affordable, the implication of extended review clauses (bearing in mind how these are panning out in terms of how Boroughs are requiring them to operate seemingly without full appreciation of the related funding implications or the delays review clauses tend to bring about with respect to structuring and policing them) is such that either path to agreeing affordable housing provisions presented by the SPG (i.e. Routes A or B via the Threshold Approach) are un-sustainable. I do not think either option will incentivise the market, quite the opposite.

d) Whilst everybody would like to see more affordable homes and a greater percentage proportion of affordable homes, the S.106 model is not the answer. The S.106 model is not meant to be a tax but a means to address harm caused by development. The Mayor and Government need to look at other affordable housing delivery models (and/or be more flexible with respect to the time duration of affordable housing 'restrictions' on S.106 affordable housing and affordability issues) as the S.106 model is already delivering as much quantum/quality as it can.

e) As we all know, property markets move in cycles and most market commentators were calling the top of the market in London (notwithstanding that there are variances between Central & Outer London etc) towards the end of 2015.

f) Recent 'start on site' statistics (e.g. as reported by MOLIOR – Page 14 Quarterly Analysis: Sales – January 2017) indicate a sharp reduction in the number of starts between 2015 and 2016. Now is not an appropriate point in the market to introduce an SPG like this.

g) I believe that, in summary, this is because short to medium term markets are particularly

Policy H7 Affordable housing tenure

User:	Kingston and Surbiton Constituency Labour Party

We welcome the emphasis on affordable housing, but the London Living Rent (4.7.5) looks complex and if it varies by ward could create anomalies near ward boundaries.

User: London Federation of Housing Cooperatives

Policy H7 – Affordable housing tenure

7.1 We propose that this policy should be renamed '**sub-market housing tenures'.**

7.2 The term '**genuinely affordable'** should be defined more rigorously. Genuinely affordable to who?

7.3 We propose that

? H7A(1) should be at altered to at least 50% (of all housing) to be social / low cost rented – to meet need identified in the SHMA.

? H7 A(2) should be altered to 15% (of all housing) to be intermediate housing to take into account the need identified in the SHMA – but also accounting for the fact that the SHMA figure is not accurate in terms of evidenced need.

? H7A(3) This should be removed. We are extremely concerned this will result in delivery of more intermediate housing than is evidenced as being needed at the expense of delivery of social / low cost rented homes.

? current text should be removed. Alternative text should say 'boroughs should ensure that all affordable housing grant is used to deliver low cost rented homes and section 106 should also be prioritised for delivery of social rented homes'.

7.4 Regarding Policy H7 supporting text

4.7.3 **Social-rented** should be included. The government has said that some affordable housing grant might be spent on delivering social-rented homes and also some boroughs may be able to deliver social-rented homes on their own land without access to affordable housing grant. Social-rented should be defined as **homes with existing social rents and service charges** and with any future rent increases as determined by government policy (not 50% higher than existing council rents – see comment below).

4.7.4 It is incorrect to say that **London Affordable Rents** are based on traditional social rents. They are based on the targets for convergence which it was assumed social-rents would reach through ‘rent restructuring’ by 2012. As this had not occurred the Lib-Dem / Conservative coalition extended the deadline for convergence to 2015/16. However, convergence was not reached by that date and in high value property areas like London, the gap between actual rents and the target rents had actually widened.3 The government ended the convergence policy in 2015/16 and introduced social rent reductions of 1% for four years (to reduce housing benefit costs). London affordable rents are based on the higher convergence target4 which are actually 50% higher than existing council rents and around 30% higher than existing housing association rents; a significant uplift.

We understood that ‘affordable rents’ should include service charges, but London Affordable Rent does not. With service charges added, housing costs can be £35 a week or more, we fear that in some instances above benefit caps.

We propose a cap be applied to London Affordable Rent plus service charges, ensuring that they are always below benefit cap levels.

4.7.5 – It should be made clear that **London Living Rents** are only accessible to middle income households with incomes of up to £60,000 a year. The text should be clear as to whether the ‘average’ is the median or mean income in London (the mean being **£51,770 and the median being £39,100**)

The supporting text should state that intermediate housing should be delivered without access to affordable housing grant. There are private companies already providing intermediate housing in this way.

4.7.6 The text of this paragraph should specify the levels of household incomes that may be able to access London Shared Ownership homes.

User: CPRE London

Affordable housing

There is a widely recognised crisis in the lack of affordable housing provision in London. This needs to be addressed through bold policies in the London Plan which require a higher proportion of genuinely affordable housing in all developments than currently proposed.

Proposed changes: The strategic target for affordable housing in **Policy H5 should be increased from 50 to 60%, with the target in A 4) increased to 60% and the target in A 5) to 70%; Policy H6 B 1) should set the threshold level of affordable housing initially at a minimum of 50%, with 2) and 3) increased to 65%. Policy H7 should require that a minimum of 50% of affordable housing should be for social/genuinely affordable rent, with other proportions adjusted accordingly.**

Rationale: The evidence in the Strategic Housing Market Assessment identifies the level of need for affordable housing as 65% of the total housing requirement. This level of need will not be met with the targets and threshold levels currently contained in the draft Plan. The final Plan needs to establish challenging yet realistic targets in order to inform the development of policies in Borough Local Plans. Unless significant steps are taken towards addressing the affordable housing crisis in London the Mayor's call for a 'City for all Londoners' will be seen simply as an empty slogan.

Density, design and local character

User:	Chartered Institute of Architectural Technologists

Policies H6, H7, H8, H9, H10, H11, H12, H13, H14, H15, H16, H17 & H18

We are in agreement with the proposals contained in the plan.

User:	Notting Hill Housing Trust

NHHT supports the Mayor’s commitments to ensure that genuinely affordable homes are delivered through the planning system. We also welcome the flexibility offered by H7.A.3 but encourage greater liaison between LPAs and RPs to give more certainty on how the 40% will be applied. NHHT encourages LPAs to clarify their approach in affordable housing SPGs. We would request that this policy stipulates that where a different tenure split is agreed with the borough according to local need/site circumstance/funding of transport infrastructure as noted in our comments to Policy H1, that this should also be eligible for the Fast Track route.

User:	Watkin Jones Group

Policy H7 Affordable Housing Tenure

This latest iteration of the affordable housing tenure policy is fully supported because the policy introduces a new level of flexibility for tenures subject to the relevant local housing need context. This added flexibility enables LPA’s and developers to be able to provide the required tenures for that Borough.

User: Town and Country Planning Association

Policy H7 – Delivering genuinely affordable homes

3.5.10 The TCPA welcomes the focus of the draft London Plan on the delivery of genuinely affordable housing, with a variety of housing products to meet different sections of the housing market in housing need. It is encouraging to see the emphasis on tenures that match affordability to earnings rather than market prices – such as the London Living Rent. Products such as the London Living Rent have the potential to provide stability to those renting (by intended a minimum tenancy offer of three years) and help them to save up for a deposit. It is also encouraging to see that local flexibility is provided for on 40% of the affordable housing required in new development.

User: Crest Nicholson PLC

We consider this Policy to be unsound as currently drafted and amendments are required.

Whilst Crest Nicholson recognizes the preference that the Mayor has set out as regards tenure mix, we consider that the policy should be amended to recognise that where it would be possible to increase the quantum of affordable dwellings to be provided within a proposed development by adjusting the tenure from that stipulated that this will be acceptable. 70% Social Rent/London Affordable Rent is likely to be the requirement arising from the combination of Part A (1) and Part A (3). It is recognised by valuers and Boroughs that where viability is an issue for a scheme that this proportion of rental tenures will have an impact on the viability of the scheme and the quantum of affordable dwellings that will be capable of being offered. As such we believe it would be right to
positively reference the ability to vary this mix where viability could be improved by doing so, where less affordable dwellings than the thresholds in Policy H6 would otherwise be delivered.

User: Benhill Residents

We propose that this policy should be renamed ‘submarket housing tenures’.

The term ‘genuinely affordable’ should be removed. Genuinely affordable to who?

We propose that
• H7A(1) should be at altered to at least 50% (of all housing) to be social / low cost rented – to meet need identified in the SHMA.
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Regarding Policy H7 supporting text

4.7.3 Social-rented should be included. The government has said that some affordable housing grant might be spent on delivering social-rented homes and also some boroughs may be able to deliver social-rented homes on their own land without access to affordable housing grant. Social-rented should be defined as homes with existing social rents and service charges and with any future rent increases as determined by government policy (not 50% higher than existing council rents – see comment below).

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The supporting text should state that intermediate housing should be delivered without access to affordable housing grant. There are private companies already providing intermediate housing in this way.

4.7.6 The text of this paragraph should specify the levels of household incomes that may be able to access London Shared Ownership homes.

User: Elaine Chambers

Policy H7 – Affordable housing tenure

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User: Earls Court Public Sector Tenants' Assoc

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[1] Page 20 - House of Commons Library Briefing Paper on Rent Setting (social housing June 2017) - http://researchbriefings.parliament.uk/ResearchBriefing/Summary/SN01090

[2] Average weekly London Council rents in 2015/16 were £107.93 (up from £65.75 in 2002/03). https://www.gov.uk/government/statistical-data-sets/live-tables-on-rents-lettings-and-tenancies (table 702)

Average weekly Housing Association rents in 2016 and £125.47 in 2016 – up from £67.99 in 2003 (as of 31st March 2013). https://www.gov.uk/government/statistical-data-sets/live-tables-on-rents-lettings-and-tenancies (table 704)

User: Orbit

Orbit is supportive of the statement under draft paragraph 4.7.2 that within some boroughs there may be a need for a broader mix of affordable housing tenures due to viability constraints or in order to create more mixed and inclusive communities. Orbit considers that a single approach to tenure mix across London is not appropriate or responsive to local borough needs, and that local planning authorities, in conjunction with developers, should be able to determine the optimum tenure split for a site based on the local context. This flexibility should also be applied to estate regeneration schemes.

Orbit welcomes the flexibility provided under paragraph 4.7.13 for sites providing over 75% affordable housing offer to follow the Fast Track Route regardless of tenure mix, as long as the type and tenure are supported by the borough, and the new homes are considered to be genuinely affordable.

User:	Orbit

Orbit is supportive of the statement under supporting draft paragraph 4.7.2 for draft Policy H7 that within some boroughs there may be a need for a broader mix of affordable housing tenures due to viability constraints or in order to create more mixed and inclusive communities. This recognition should be a key consideration when assessing estate regeneration schemes.

User: London Property Alliance

It is vital that London continues to provide homes for the key workers needed to maintain its services. To achieve this – particularly in the context of Central London – flexibility on the location, type and tenure terms of new housing is essential.

The Alliance considers that the proposed approach to tenure split in Policy H7 and elsewhere within the draft Plan is too prescriptive, particularly for central London boroughs.

The Mayor should not be prescriptive in defining types of tenure and eligibility criteria at the strategic level. For example, the Mayor's eligibility criterion for intermediate rent of £60,000 per year is too low given high land prices within the CAZ (para 4.7.8).

There are households in high value areas of the CAZ, with incomes that exceed the eligibility criteria for intermediate rent and/or shared ownership but that are too low to enable them to afford homes on the open market and are therefore unable to access housing that meets their needs.

There is a particular problem of marginality, for households with incomes that just exceed the relevant income levels.

The eligibility criteria should therefore not be prescriptive in the Plan, and preferably, far greater flexibility provided to allow locally-set rents and income levels, rather than relying upon the caps within the Plan or Housing Strategy. RPs should be provided with greater flexibility to determine the appropriate mix of tenure and rental levels to meet demand and maximise affordability. A range of rents should be permitted within affordable housing so that a wider range of needs of those that cannot access market housing can be met. A one-size fits all approach across London is not appropriate. A more flexible approach would also increase the overall proportion of affordable housing.

The explanatory text to Policy H7 should also be amended accordingly.

The Alliance welcomes the additional flexibility introduced in Policy H7 to allow boroughs to develop their own preferred tenure mix. It is important that this extends to the detail of eligibility and target rents. The Alliance suggests that Policy H7 is amended as follows to remove reference to the specific tenure types:

“The Mayor is committed to delivering genuinely affordable housing. The following split of affordable products should be applied to development:

1) a minimum of 30 per cent low cost rented homes, allocated according to need and for Londoners on low incomes ~~(Social Rent/ London Affordable Rent)~~
2) a minimum of 30 per cent intermediate products which meet the national definition of affordable housing, ~~including London Living Rent and London Shared ownership~~
3) 40 per cent to be determined by the relevant borough based on identified need, provided they are consistent with the definition of affordable housing.”

User: London Borough of Newham

Policy H7 Affordable Housing Tenure

LBN are general supportive of draft policy H7 and consider that it is broadly aligned with the LBN's approach to tenure requirements. However, given the above concerns about the low level (35%) threshold for detailed viability appraisal (set out in the response to H6) there should be flexibility about how part B is applied locally (e.g. it should only be applied in a Newham context where schemes meet the 50% affordable housing target and demonstrate the appropriate tenure split).

User:	London Borough of Sutton

SUPPORT WITH CONDITIONS. The London Borough of Sutton’s adopted Local Plan sets an affordable housing tenure split of 75%/25% between social/affordable rent and immediate/shared ownership products. Draft London Plan Policy H7 sets a split of 30% social/affordable rent, 30% immediate rent and 40% to be determined at a borough level. The London Borough of Sutton notes that paragraph 4.7.2 would support the council allocating this entire 40% to social/affordable rent products to achieve broad consistency with the Sutton Local Plan. As such the council supports Policy H7.

However, the council is concerned that it may not be possible to deliver the level of affordable housing set out in Policy H5 with grant if national funding is focussed on intermediate products instead of affordable rent/social rent.

User: PRP

Policy H7 sets out that affordable housing tenure will be split for developments at 30% social/affordable rent, 30% shared ownership, and the remaining 40% to be decided by the individual borough. This approach provides a significant change in affordable housing tenures from borough to borough which creates ambiguity for registered providers and developers who operate across the capital.

As with the affordable housing threshold approach, it is also stated within policy H7 that the tenure split will be reviewed in 2021 and addressed through a further SPG. This also creates uncertainty for developers wanting clarity on investment in housing in the capital. The ambition of the Mayor to address any change through an updated SPG will also create potential conflict between future guidance and policy within the adopted London Plan.

User: Persimmon Homes

The policy is unsound as it is not evidenced that this will unduly impact viability.

London Boroughs should not base their determination of tenure on the ‘40%’ of the total affordable housing based on housing need alone as detailed in draft Policy H7. In line with Par 50 of the NPPF, Consideration should also be given to local demand, widening choice where appropriate and the objective of widening the opportunities for stair casing to home ownership. In addition, London Local Authorities should consider the impact of tenure on development viability and the cumulative impacts of policies within the London Plan and their Local Plan.

User: Blackheath Society

Policies H5 Delivering affordable housing; H6 Threshold approach to applications; H7 Affordable housing tenure; and H8 Monitoring affordable housing: We support the introduction of these policies and the thrust of the draft supporting text. As noted earlier in connection with Policy D8, we believe there should be a much higher level of transparency/accountability in relation to viability assessments to enable informed debate with interested parties other than the local authority. We strongly support Policy H7 on genuinely affordable housing and in particular the treatment of London Affordable Rent at Policy H7A1 and paragraph 4.7.4. We welcome the prospect of compliance with affordable housing targets being monitored more rigorously than has been the case to date.

User: Barnet Society

Policy H7 – Affordable housing tenure

We support the Mayor's commitment to various forms of affordable rent and shared ownership, but would like to see more positive support for social housing. Social housing should be specified as general needs rented accommodation with a subsidised rent provided by Local Authorities or Housing Associations. Also, a percentage of this type of housing should be designated for key workers.

User:	Clarion Housing Group

As a housing association, we understand the need for a variety of housing products to suit different needs for both sale and rent. We are particularly supportive of the London Affordable Rent which recognises the need for a genuinely affordable rental product linked to what people on lower incomes can afford rather than out-of-control market rents. We are also committed to a programme of Shared Ownership which in our experience continues to provide an affordable and well understood route into home ownership. Yet it is important to recognise that having multiple products can lead to competition between similar housing products, and flexibility is required to move between various products depending on the local market.

User:	Dagenham Dock Limited

Draft Policy H7 – Affordable Housing Tenure

Draft Policy H7 establishes future tenure of affordable housing. The policy requires 30% low cost rented homes (Social Rent / Affordable Rent), 30% intermediate products (Shared Ownership / London Living Rent); with the final 40% to be determined by the relevant borough based on identified need. Whilst DDL are not opposed to this policy aspiration, it is important that the GLA recognise all factors contributing to the overall development viability, and apply an element of flexibility to the proposed tenure split if it results in the delivery of i) a higher provision of affordable housing, or ii) a more preferable housing tenure for the borough. As currently worded, Draft Policy H7 could be considered at odds with the aspirations of the affordable housing policies included within the borough's Development Plans. This is referenced within para. 4.7.1 – 4.7.2, but should however be incorporated into the policy wording of Policy H7.

User: Imperial College London

Understandably, the section on affordable housing discusses the problem in general terms and sets out the Mayor's draft policies for trying to deliver more homes that are affordable.

Organisations like Imperial College London are finding that the shortage of housing that is affordable is diminishing the attractiveness of London as a place to live and work, making it difficult to attract and retain the best academic and research minds. The high and rising cost of living in London is a fundamental threat to Imperial College London's ability to recruit and retain. Staff are the most critical resource for Imperial College London in maintaining its global top 10 status.

The cost of housing is an issue across all levels of Imperial College London's 8,000 strong staff community. There is a particular crisis around the impact on its postdoctoral community of around 2,500 people. Attracting and retaining this highly skilled group of people is a high priority for both Imperial College London and the wider business and tech community. The globally competitive nature of these research fields, combined with the high cost of living in London, results in too many of the very best researchers taking up offers at institutions in more affordable locations. A recent survey by Imperial College London of the postdoctoral research community identified that researchers are already considering leaving and potential new recruits are not taking up offers, due in part to the high living costs in London. In the survey, 58% of respondents viewed housing costs as the biggest challenge to working in London and 54% are currently having to pay rent that GLA policy considers unaffordable.

Due to the historic limitations of policy around key worker accommodation, Imperial College London is now directly providing homes in order to address this problem and is committed to building a portfolio of key worker housing for its staff, with affordability weighted to target the income banding of its postdoctoral staff.

Experience has demonstrated to Imperial College London that a mix of one and two bedroom units, rather than larger family units, is the accommodation that is most suitable for addressing the area of greatest need.

An effective solution for the challenges faced by this unique sector would be the creation of an additional policy, specifically supporting and facilitating key worker housing with flexible tenure requirements suitable for the relevant organisation. Imperial College London would welcome the opportunity to work with the Mayor to formulate the precise wording for this policy.

If the Mayor is not prepared to create this additional policy, it is requested that an additional paragraph be added after 4.7.7 to recognise that particular organisations who encounter housing problems that have an adverse impact on their business, will be supported by the Mayor in plans to provide their own key worker housing and that each such proposal will be considered on its merits, without necessarily needing to follow the tenure splits applied to general housing.

User:	Aitch Group

Whilst my client welcomes the Mayors approach in terms of looking to diversify affordable housing tenures, their experience has been that this does not always receive support at borough level who have their own aspirations for tenure split.

The Mayor needs to ensure there is a clear directive and approach to tenure across London.

My client does not support the Mayor looking to set housing mix requirements, particularly for market housing, which should be determined at borough level taking account of site characteristics.

User:	London Borough of Ealing

The Council supports these policies which are largely based on the previously published Affordable Housing and Viability Supplementary Planning Guidance (SPG), August 2017.

User: Highgate Society

Object

An “affordable” rent in London is taken at 70-80% of market value. This is patently discriminatory against the majority of key workers Rents in high value areas like Highgate, and possibly over most of London, are still not “affordable” even with this reduced percentage.

The balance/loss of rented accommodation through RTB over the years should be addressed.

User: Peabody

We welcome the Mayor’s work to ensure rents are linked to local incomes and the clarity this provides. In our experience, some boroughs are attempting to drive rents below this position through the planning process. As an organisation which has historically worked to keep rents as low as possible while still maintaining a significant development programme, we do understand the importance of low rents. However, recent research conducted by Capital Economics has suggested that tenants London and the Southeast can sustain higher rents and in doing so, support the development of more sorely needed social homes. The national 1% rent reduction policy has reduced our ability to develop low-cost rented homes, at the expense of low-income families trapped in the expensive private rented sector, as well as the long-term Housing Benefit bill. It is thus important that rent policy in London is consistent and does not prioritise short-term reductions in rents over the long-term output of low-cost rented units.

Regarding point 4.7.9 “For dwellings to be considered affordable, annual housing costs… should be no greater than 40 per cent of net household income”, while this is a good aspiration, there is a clash with high value areas. Shared ownership can become unviable. We suggest a tier system for different value areas, and a phased introduction. We have sites currently owned that are assessed on different criteria and this affects the viability of those schemes.

User: Mr Gary Hayes

Policy H7 – Affordable housing tenure

7.1 We propose that this policy should be renamed ‘sub-market housing tenures’.

7.2 The term ‘genuinely affordable’ should be removed. Genuinely affordable to who?

7.3 We propose that

? H7A(1) should be at altered to at least 50% (of all housing) to be social / low cost rented – to meet need identified in the SHMA.

? H7 A(2) should be altered to 15% (of all housing) to be intermediate housing to take into account the need identified in the SHMA – but also accounting for the fact that the SHMA figure is not accurate in terms of evidenced need.

? H7A(3) This should be removed. We are extremely concerned this will result in delivery of more intermediate housing than is evidenced as being needed at the expense of delivery of social / low cost rented homes.

? current text should be removed. Alternative text should say ‘boroughs should ensure that all affordable housing grant is used to deliver low cost rented homes and section 106 should also be prioritised for delivery of social rented homes’.

7.4 Regarding Policy H7 supporting text

4.7.3 Social-rented should be included. The government has said that some affordable housing grant might be spent on delivering social-rented homes and also some boroughs may be able to deliver social-rented homes on their own land without access to affordable housing grant. Social-rented should be defined as homes with existing social rents and service charges and with any future rent increases as determined by government policy (not 50% higher than existing council rents – see comment below).

4.7.4 It is incorrect to say that London Affordable Rents are based on traditional social rents. They are based on the targets for convergence which it was assumed social-rents would reach through ‘rent restructuring’ by 2012. As this had not occurred the Lib-Dem / Conservative coalition extended the deadline for convergence to 2015/16. However, convergence was not reached by that date and in high value property areas like London, the gap between actual rents and the target rents had actually widened.5 The government ended the convergence policy in 2015/16 and introduced social rent reductions of 1% for four years (to reduce housing benefit costs). London affordable rents are based on the higher convergence target6 which are actually 50% higher than existing council rents and around 30% higher than existing housing association rents; a significant uplift.

We understood that ‘affordable rents’ should include service charges, but London Affordable Rent does not. With service charges added, housing costs can be £35 a week or more, we fear that in some instances above benefit caps.

We propose a cap be applied to London Affordable Rent plus service charges, ensuring that they are always below benefit cap levels.

4.7.5 – It should be made clear that London Living Rents are only accessible to middle income households with incomes of up to £60,000 a year. The text should be clear as to whether the ‘average’ is the median or mean income in London (the mean being £51,770 and the median being £39,100)

The supporting text should state that intermediate housing should be delivered without access to affordable housing grant. There are private companies already providing intermediate housing in this way.

4.7.6 The text of this paragraph should specify the levels of household incomes that may be able to access London Shared Ownership homes.

User: Mr Timothy Gill

There is a predicted increase in children in London (see SHMA, fig. 26). The current housing mix table in the Plan does not seem to reflect this fact, and does not reflect the aims of policy GG4 to ‘create mixed and inclusive communities.’ The Plan should either be updated to reflect the need for more family housing, or set out a clear strategy to reduce levels of under-occupation and free up existing family housing for families that need it.

User:	Landsec

H7 Tenure mix: The Plan is very prescriptive in terms of tenure, which may have a negative impact on the quantum and quality of affordable homes produced. The clarification at 4.7.12 that tenure split is a "starting point for negotiation" where the viability test is not met is helpful. We believe however the Plan should be less prescriptive to enable the Mayor and LPA’s to respond appropriately to local need and on a site by site basis. London First have proposed some helpful amendments to the Plan in this area that we ask you to consider.

User: Andrea Carey Fuller

We propose that this policy should be renamed ‘**sub-market housing tenures’**.

The term ‘**genuinely affordable’** should be removed. Genuinely affordable to who?

We propose that

- H7A(1) should be at altered to at least 50% (of all housing) to be social / low cost rented – to meet need identified in the SHMA.
- H7 A(2) should be altered to 15% (of all housing) to be intermediate housing to take into account the need identified in the SHMA – but also accounting for the fact that the SHMA figure is not accurate in terms of evidenced need.
- H7A(3) This should be removed. We are extremely concerned this will result in delivery of more intermediate housing than is evidenced as being needed at the expense of delivery of social / low cost rented homes.
- current text should be removed. Alternative text should say ‘boroughs should ensure that all affordable housing grant is used to deliver low cost rented homes and section 106 should also be prioritised for delivery of social rented homes’.

Regarding Policy H7 supporting text

4.7.3 **Social-rented** should be included. The government has said that some affordable housing grant might be spent on delivering social-rented homes and also some boroughs may be able to deliver social-rented homes on their own land without access to affordable housing grant. Social-rented should be defined as **homes with existing social rents and service charges** and with any future rent increases as determined by government policy (not 50% higher than existing council rents – see comment below).

4.7.4 It is incorrect to say that **London Affordable Rents** are based on traditional social rents. They are based on the targets for convergence which it was assumed social-rents would reach through 'rent restructuring' by 2012. As this had not occurred the Lib-Dem / Conservative coalition extended the deadline for convergence to 2015/16. However, convergence was not reached by that date and in high value property areas like London, the gap between actual rents and the target rents had actually widened.[1] The government ended the convergence policy in 2015/16 and introduced social rent reductions of 1% for four years (to reduce housing benefit costs). London affordable rents are based on the higher convergence target[2] which are actually 50% higher than existing council rents and around 30% higher than existing housing association rents; a significant uplift.

We understood that 'affordable rents' should include service charges, but London Affordable Rent does not. With service charges added, housing costs can be £35 a week or more, we fear that in some instances above benefit caps.

We propose a cap be applied to London Affordable Rent plus service charges, ensuring that they are always below benefit cap levels.

4.7.5 – It should be made clear that **London Living Rents** are only accessible to middle income households with incomes of up to £60,000 a year. The text should be clear as to whether the 'average' is the median or mean income in London (the mean being **£51,770 and the median being £39,100**)

The supporting text should state that intermediate housing should be delivered without access to affordable housing grant. There are private companies already providing intermediate housing in this way.

4.7.6 The text of this paragraph should specify the levels of household incomes that may be able to access London Shared Ownership homes.

[1] Page 20 - House of Commons Library Briefing Paper on Rent Setting (social housing June 2017) - http://researchbriefings.parliament.uk/ResearchBriefing/Summary/SN01090

[2] Average weekly London Council rents in 2015/16 were £107.93 (up from £65.75 in 2002/03). https://www.gov.uk/government/statistical-data-sets/live-tables-on-rents-lettings-and-tenancies (table 702)

Average weekly Housing Association rents in 2016 and £125.47 in 2016 – up from £67.99 in 2003 (as of 31st March 2013). https://www.gov.uk/government/statistical-data-sets/live-tables-on-rents-lettings-and-tenancies (table 704)

User: Lendlease

This policy is overly prescriptive. LPA's may wish to set locally specific targets on tenure mix and such a strict policy across the city is not appropriate. Given that the London Plan is a spatial strategy which Local Plans must be 'in general conformity' with such a precisely delineated split is not appropriate.

A The Mayor is committed to delivering genuinely affordable housing. T~~he following split of affordable products should be applied to development~~: **development should be in general accordance with the following standards, or in accordance with a locally defined alternative split:**

1) ~~a minimum of~~ 30 per cent low cost rented homes, allocated according to need and for Londoners on low incomes (Social Rent/ London Affordable Rent)
2) ~~a minimum of~~ 30 per cent intermediate products which meet the definition of affordable housing, including London Living Rent and London Shared ownership
3) 40 per cent to be determined by the relevant borough based on identified need, provided they are consistent with the definition of affordable housing.
These minimums will be reviewed in 2021, and if necessary, updated ~~through Supplementary Planning Guidance.~~
~~B Only schemes delivering the threshold level of affordable housing with a tenure split that meets the requirements set out in part A can follow the Fast Track Route for viability.~~

Part B repeats the requirements of Policy H6 and in the interests of reducing what is a very lengthy and detailed plan should be removed. Furthermore, amending the tenure split would need to have regard to viability, such a change would represent a change of policy which should be subject to rigorous viability testing and examination, not the reduced level of consultation required for an SPG which provides additional information to guide interpretation of a policy, not change it.

The policy as currently worded is too rigid, it does not allow sufficient flexibility to respond to change as required by para. 14 of the NPPF and as the London Plan is a spatial strategy, not a local plan, it should ensure that there is sufficient flexibility to adapt policies to local needs. This level of prescriptive detail is not justified and it should be amended as set out above to ensure it is sound.

User:	Unknown

Our client supports the Mayor’s ambition to provide a diverse mix of affordable housing tenures; however, as our client has experienced across several plots, achieving the threshold of 35% affordable housing and the necessary tenure mix is very challenging. Providing 30% intermediate products including LLR can be very challenging particularly with values in Brent. Including specific threshold targets for tenure groups (such as LLR) can reduce the quantum headline figure compared with other tenures (DMR). Achieving a policy compliant tenure mix and 35% affordable housing is very challenging in Brent.

User: Taylor Wimpey UK

Policy H7 Affordable housing tenure

We object to this Policy given it is overly prescriptive and unjustified.

Details of affordable housing tenure should be addressed by individual planning authorities through their development plans.

Where developers provide a minimum of 35% affordable housing that reflects the needs of the Local Authority, the applicant should benefit from the fast track approach.

User: Aberfeldy New Village LLP

Tenure Split (Policy H7)

We consider that the precise split included within this policy is overly prescriptive given the strategic nature of the plan and varied priorities of the boroughs. Some flexibility should be built in to reflect location, site characteristics, viability and the passage of time. The NPPF (Paragraph 14) states that Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change

In this regard we propose the following changes:

A The Mayor is committed to delivering genuinely affordable housing. ~~The following split of affordable products should be applied to development~~: ***development should be in general accordance with the following standards, or in accordance with a locally defined alternative split:***

1) ~~a minimum of~~ 30 per cent low cost rented homes, allocated according to need and for Londoners on low incomes (Social Rent/ London Affordable Rent)

2) ~~a minimum of~~ 30 per cent intermediate products which meet the definition of affordable housing, including London Living Rent and London Shared ownership

3) 40 per cent to be determined by the relevant borough based on identified need, provided they are consistent with the definition of affordable housing.

These minimums will be reviewed in 2021, and if necessary, updated ~~through Supplementary Planning Guidance~~.

~~B Only schemes delivering the threshold level of affordable housing with a tenure split that meets the requirements set out in part A can follow the Fast Track Route for viability.~~

Part B repeats the requirements of Policy H6 and this repetition should be removed. Furthermore, amending the tenure split would need to have regard to viability. Accordingly, this would require a change of policy which should be subject to rigorous viability testing and examination, not the reduced level of consultation required for an SPG which provides additional information to guide interpretation of a policy, not change it.

The policy as currently worded is unnecessarily rigid and does not provide adequate flexibility to respond to change as the NPPF (para. 14) requires. This level of prescriptive detail is not justified and is unlikely to be effective, particularly given the strategic level of the draft Plan. I should be modified as suggested above.

User: Elephant Amenity Network

Policy H7 – Affordable housing tenure

7.1 We propose that this policy should be renamed ‘sub-market housing tenures’.

7.2 The term ‘genuinely affordable’ should be removed. Genuinely affordable to who?

7.3 We propose that
• H7A(1) should be at altered to at least 50% (of all housing) to be social / low cost rented – to meet need identified in the SHMA.

• H7 A(2) should be altered to 15% (of all housing) to be intermediate housing to take into account the need identified in the SHMA – but also accounting for the fact that the SHMA figure is not accurate in terms of evidenced need.
• H7A(3) This should be removed. We are extremely concerned this will result in delivery of more intermediate housing than is evidenced as being needed at the expense of delivery of social / low cost rented homes.
• current text should be removed. Alternative text should say ‘boroughs should ensure that all affordable housing grant is used to deliver low cost rented homes and section 106 should also be prioritised for delivery of social rented homes’.

User:	Elephant Amenity Network

Regarding Policy H7 supporting text

4.7.3 Social-rented should be included. The government has said that some affordable housing grant might be spent on delivering social-rented homes and also some boroughs may be able to deliver social-rented homes on their own land without access to affordable housing grant. Social-rented should be defined as homes with existing social rents and service charges and with any future rent increases as determined by government policy (not 50% higher than existing council rents – see comment below).

User: Elephant Amenity Network

4.7.4 It is incorrect to say that London Affordable Rents are based on traditional social rents. They are based on the targets for convergence which it was assumed social-rents would reach through ‘rent restructuring’ by 2012. As this had not occurred the Lib-Dem / Conservative coalition extended the deadline for convergence to 2015/16. However, convergence was not reached by that date and in high value property areas like London, the gap between actual rents and the target rents had actually widened. The government ended the convergence policy in 2015/16 and introduced social rent reductions of 1% for four years (to reduce housing benefit costs). London affordable rents are based on the higher convergence target which are actually 50% higher than existing council rents and around 30% higher than existing housing association rents; a significant uplift.

We understood that ‘affordable rents’ should include service charges, but London Affordable Rent does not. With service charges added, housing costs can be £35 a week or more, we fear that in some instances above benefit caps.

We propose a cap be applied to London Affordable Rent plus service charges, ensuring that they are always below benefit cap levels.

User:	Elephant Amenity Network

4.7.5 – It should be made clear that London Living Rents are only accessible to middle income households with incomes of up to £60,000 a year. The text should be clear as to whether the ‘average’ is the median or mean income in London (the mean being £51,770 and the median being £39,100)

The supporting text should state that intermediate housing should be delivered without access to affordable housing grant. There are private companies already providing intermediate housing in this way.

User:	Elephant Amenity Network
4.7.6 The text of this paragraph should specify the levels of household incomes that may be able to access London Shared Ownership homes.	

User: Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living

H7 (169) - Affordable Housing Tenure

As set out above, we believe that retirement proposals should be exempt from affordable housing requirements given the bespoke identified housing need for this type of housing and the very low levels currently being provided.

In general this policy creates a number of questions.
? It creates uncertainty in testing and appraising land prior to purchase as for example, how quickly will boroughs set out their 40% requirement?
? How can land be bought with certainty on this basis?
? If Boroughs are exempt from preparing their own SHMA, how can they accurately determine local tenure requirements and those specific to specialist retirement housing?
? Is there a 50% or even 35% affordable requirement for specialist forms of affordable housing? This is not the case for every London Borough in Annex 5.
? Finally, how has this tenure mix requirement been adequate tested within the DLP viability testing when the borough level tenure requirement is unknown?

All of the above leads to a very confusing picture for developers attempting to purchase land with any certainty and is likely to be detrimental to the DLP aspiration to increase the supply of housing in general.

Objection: This policy is not positively prepared. The approach detailed has not been found to be viable for older persons' accommodation and is neither justified nor effective. We also consider the policy to be inconsistent with national planning policy as it is overly prescriptive for a strategic document. We respectfully request that it should be amended or removed.

User: Urbanissta

Policy H7 Affordable Housing Tenure

The Mayor sets out the following preferred split of affordable products:

- A minimum of 30% low cost rented homes (social rent/London affordable rent)
- A minimum of 30% intermediate products which meet the definition of affordable housing including LLR and LAR

40% to be determined by the relevant borough

Comment: This Policy takes away LPA power and we consider that it should be under the discretion of London LPAs to determine through their Local Plans. This is not a strategic matter.

User: London Borough of Camden

The Council supports the overall breakdown of 30% London Affordable Rent, 30% intermediate housing, and 40% borough-determined tenure, as set out in Policy H7.

In Policy H7, social rent and London Affordable Rent are referred to by the collective term "low cost rented homes". We consider this term to be misleading, as the phrase "low cost" has commonly been applied to intermediate products, notably "low cost home ownership". In our view, the Criterion A (1) should simply refer to a minimum of 30 per cent London Affordable Rent and / or Social Rent homes, allocated according to need for Londoners on low incomes.

In addition, in our view the London Plan should acknowledge that shared-ownership is not a suitable affordable tenure where house prices are high (including most of Camden), and should also allow more regard to be had to the relatively high incomes needed for London Living Rent in parts of London such as Camden.

House prices in Camden mean that shared-ownership will rarely be affordable to households with incomes below the £90,000 cap, and consequently the Camden Local Plan 2017 sets out a strong preference for intermediate rent. The Mayor's SPG on Affordable Housing and Viability recognises that shared ownership will not be appropriate where capital values of homes exceed £600,000, but this recognition is absent from the new London Plan.

Furthermore, we have recently adopted an Intermediate Housing Strategy and set up the company Camden Living. These aim to provide intermediate housing for Camden residents and workers (subject to a priority matrix) with incomes of £30,000 to £40,000, which is significantly lower than the cap for London Living Rent.

The Council considers that the London Plan should make greater reference to the provisions of the Mayor's SPG on Affordable Housing and Viability in relation to shared ownership, and particularly the £600,000 as the maximum value of a home that can be accessed at a range of incomes below the £90,000 income cap. These considerations could be included in paragraph 4.7.9. The London Plan should also provide greater flexibility to deliver local intermediate rent products, without a 'rent to buy' requirement (i.e. they continue to be available for rent after 10 years), and targeted at lower income groups in accordance with local priorities.

In particular, supporting paragraph 4.7.10 indicates that boroughs can set their own eligibility/ income cap criteria, but then states that these should be released to the London-wide eligibility criteria after a 3-month period, and should not apply to resales and relets. The Council considers that the London-wide eligibility criteria should only be imposed where GLA funding is provided, and that the GLA should restore the provision in existing London Plan paragraph 3.62 – this indicates that “If boroughs wish to set eligibility criteria... agreements should secure them... for no more than three months from the point of initial marketing (whether that be when new or at re-sale or re-let)”.

We note that in association with Policy H7, Table 4.3 sets out the findings of the 2017 SHMA with respect to the need for homes of different sizes (in terms of numbers of bedrooms). We have a number of observations in relation to Table 4.3:

- We consider that the categories used in Table 4.3 should better dovetail with the categories used in paragraph 4.7.3. As indicated in our comments above, we consider the term "low cost rent" to be misleading, as the phrase "low cost" has commonly be applied to intermediate products. Reference to the London SHMA 2017 indicates that the “low cost rent” category in Table 4.3 essentially gives an indication of the need for London Affordable Rent, and does not include households who would be able to afford London Living Rent. We note that the “intermediate” category in Table 4.3 gives an indication of the need for intermediate housing of all types, including London Living Rent and London Shared Ownership. Consequently, in our view, the third row of the table should be labelled as London Affordable Rent and / or Social Rent homes.

- Table 4.3 relates more closely to the requirements of Policy H12 Housing Size Mix than the requirements of Policy H7. We suggest that Table 4.3 should be moved to the paragraphs supporting Policy H12, or that thorough cross-referencing with internal links should be introduced to connect Table 4.3 with Policy H12 and supporting paragraphs.

- The pan-London indication of needs in Table 4.3 does not necessarily relate closely to local needs at the borough level, and certainly does not closely reflect the needs identified by the Camden SHMA 2016. The Council’s comments on Policy H12 seek greater recognition of local circumstances and local needs for homes of different sizes.

User: The Highbury Group

Policy H7 Affordable Housing tenure

A1 Replace 30% low cost rented homes by 70% A2 Leave 30% target for intermediate homes. Delete A3 (40% to be determined by relevant borough)

Para 4.7.4 Affordable rent products should have costs no greater than 30% net income for households with income in the lowest quartile of London household incomes. Further guidance will be given in Supplementary Planning guidance and updated annually through the Annual Monitoring Report.

Para 4.7.6 At least 50% of shared ownership units provided within a development should be affordable by households on annual incomes below £45,000. This will be updated on an annual basis through the Annual Monitoring Report.

Para 4.7.8 At least 50% of intermediate rented units provided within a development should be affordable by households on annual incomes below £45,000. This will be updated on an annual basis through the Annual Monitoring Report.

Explanatory note: These amendments introduce targets for different types of affordable housing which are based on the proportionate requirements set out in the SHMA. They reintroduce explicit income related definitions for different types of affordable housing and would ensure that part of the sub-market intermediate provision are targeted at middle income households and not just at those at the top of the intermediate housing income range. This was specified in some previous London Plans.

User: The Highbury Group

4. Definitions of affordable housing

The Plan policies defining the affordability of different categories of sub-market housing are unsatisfactory. This is a complex issue given Government policies state that any housing for sale at a price below 80% of market value and for rent at below 80% market rent is considered to be
affordable in planning terms and consequently contributes to any affordable housing target set in a Local Plan. The former Mayor of London was required by central government to remove the separate definition of social rent from the 2011 London Plan. However, the Government now recognises the need for new social rented housing (including council housing) and the opportunity to restate a satisfactory income-related definition of social rented housing should not be lost, as it would now be difficult for the Government to object to this. The Mayor should be seen to be taking a lead.

User: The Highbury Group

Para 4.74 on London Affordable Rent (put forward as a new form of low-cost rent) , refers to rent levels well below the Government's definition of ' affordable rent' (which is at up to 80% market rent) ' based on traditional social rents' and then refers to the Mayor's Affordable Homes Programme 2016-21. However, this is not a statutory planning document. Moreover, this programme terminates in 2021 at which point a new programme will be established, with potentially new funding criteria, whereas the new Plan is to extend to 2041. The term 'traditional social rent' is not defined within the Plan and there is no reference to rent levels in relation to household income levels. The solution to this problem is to restate the definition of social rent housing costs (rents and service charges) included in the 2004 and 2008 London Plans as 30% of net incomes for the lowest quartile of households. This will ensure schemes aiming to provide low cost rent units, whether or not funded from the Mayor's Affordable Homes Programme, can be assessed as to whether or not they meet explicit affordability criteria. This is important given that some schemes may be provided directly by boroughs or indirectly through s106 agreements without grant from the Mayor's programme.

User:	The Highbury Group

Para 4.7.5 refers to London Living Rent aimed at households on middle incomes. No rent levels are stated. Para 4.7.8 recognises that this is an ‘intermediate’ housing product and states that this is aimed at households with incomes up to £80,000 a year. Para 4.79 referred to an assumption of 40% of net average income for intermediate housing products, though the mechanism for assessing proposals for specific schemes is unclear. We think that the financial viability appraisal system must reintroduce this affordability assessment mechanism.

User: The Highbury Group

Paras 4.7.6 and 4.7.8 refer to London Shared Ownership. This is based on an income limit of £90,000, which will also apply to other forms of intermediate housing products such as discounted market sale. The previous distinction in upper limits between family sized homes and smaller homes has been dropped. While para 4.7.9 encourages boroughs ‘to ensure that intermediate provision provides for households with a range of incomes below the upper limit’ to ensure this objective is achieved, we consider that it is necessary to reintroduce the requirement (as in the 2008 Plan) that half of provision should be for households below a specified mid-point in the income range (which as at February was £35,600, but which now would be higher). As in previous years the income limits for different types of intermediate provision will be reviewed on an annual basis through the annual monitoring report. It would be helpful if the Plan set out as a footnote the methodology for such reviews, to give an assurance that affordability in relation to household incomes will not worsen over the full plan period.

User: Age UK London - a charity working with older Londoners

POLICY H7: AFFORDABLE HOUSING TENURE

PROPOSED POLICY AMENDMENT:

A. The Mayor is committed to delivering genuinely affordable housing. The following split of affordable products should be applied to development:

1) a minimum of 30 45 per cent low cost rented homes, allocated according to need and for Londoners on low incomes (Social Rent/ London Affordable Rent)

2) a minimum of 30 per cent intermediate products which meet the definition of affordable housing, including London Living Rent and London Shared ownership

3) 40 25 per cent to be determined by the relevant borough based on identified need, provided they are consistent with the definition of affordable housing.

User: Age UK London - a charity working with older Londoners

33. H7 A1 and 3. LINK TO POLICY CHANGE The proposed amendments suggest a more appropriate split between low cost social housing and other affordable housing products; they are based on the following evidence:

(i) “To alleviate London’s current housing crisis, where demand outstrips supply, more affordable social housing is urgently required. We recommend that available public land be transferred to LAs and HAs (Housing Associations) at low prices and LA borrowing limits eased enabling them to build new social housing and to refurbish existing stock to a decent standard.
To retain these valuable assets for future generations, we recommend LAs and HAs should be able to choose not to sell.
For a sustainable housing policy that ensures sufficient decent affordable homes for all Londoners in future, housing demand must be stabilised by discouraging overseas buyers from using ‘Buy to Leave’ and ‘Buy-to-Let’. We recommend disincentives to using London housing need as an investment for capital gain and policies at national and regional level to distribute employment opportunities more evenly across the UK”
(Professor Anthea Tinker and Professor Jay Ginn, ‘How Far has London Come as an Age Friendly City?’).

(ii) From our consultation conference on 8.2.18
“£170k a year is the average income in Kensington and Chelsea. The average income in our Housing Association is £12k a year I and my friends would never be able to afford a so-called ‘affordable rent’. Many older people have low fixed incomes, just above benefit levels or at benefit levels. Our incomes won’t go up as rents go up. This has to be taken into account” see Appendix 2.

(iii) This was a top priority for people extensively consulted by Age UK London, with reference to the Mayor’s Draft London Housing Strategy and submitted in December 2017.

(iv) It is our view that inadequate housing perpetuates poverty and ill health. It contributes to social unrest, and to a lack of social cohesiveness. In an ageing society, inter-generational reciprocity, one of the planks of the UK pension system, continues to be crucial. Investing in the young, therefore, starting with decent low- cost social rented homes that give rise to settled communities is deemed to be essential. The proposed variations in the split in 1 and 3 in our view better reflect the need for low cost social rented housing whilst observing the Mayor’s desire to assist those Londoners with middle incomes.

User:	Pocket Living

There is broad support for the need to provide a range of tenures within boroughs and within development schemes. The proposed formula will allow boroughs to be more flexible in the approach to indvidual development schemes.

Whilst the focus on LAR, LLR and LSO as the principle tenures is understood, there needs to be stronger support for other forms of intermediate housing which meet the definition of affordable housing in the NPPF. Pocket's approach to the delivery of intermediate housing is well known and Pocket has delivered over 500 homes in 12 London Boroughs over the last decade.

User:	Pocket Living

The wording in Para 4.7.7 suggests other forms of affordable housing may be acceptable as long as they meet the definition of genuinely affordable. This is applying a second test to the definition of affordable housing which applies further restrictions through the eligibility criteria set out in the AMR. Pocket considers the wording should be positive and state that other forms of affordable housing will be acceptable unless they do not meet the tests set out in the NPPF. It is important that the policies of the London Plan allow for a range of household income thresholds to be addressed. Pocket and other forms of intermediate housing are 'genuinely affordable' (as confirmed by the Mayor himself) and meet the definition set out in the London Plan. They are tied to affordability in terms of eligibility and perpetuity through Section 106 Agreements. The Mayor should be more definitive in his support for a wider range of affordable tenures.

User:	Pocket Living

There is support for the Mayor's insistence that local income caps should only apply for three months as noted in para 4.7.10. A number of boroughs across London seek to apply more onerous local restrictions for longer periods which can be problematic as buyers struggle to secure a mortgage if restrictons extend beyond 24 weeks on resale. Pocket consider the approach should be that the Mayor's income threshold (as set out in the AMR) is the default position and that boroughs only adopt local housing income restrictions for 3 months in exceptional circumstances and where this can be fully justified through detailed evidence.

User:	Pocket Living

The objective of Para 4.7.13 is strongly supported as it provides innovative developers like Pocket the opportunity to benefit from the Fast Track Route by delivering wholly intermediate homes as long as the affordable element comprises at least 75% of them. Pocket's schemes are almost always over 75% affordable and Pocket always seeks to maximise the number of affordable homes within its schemes to assist Londoners to secure their first homes. However, on a number of sites, Council policies seek a range of tenures/unit mix and based on the wording of the policy, a number of boroughs are likely to require that Pocket's schemes follow the Viability Tested Route even when providing 100% affordable homes.

User:	Pocket Living

Furthermore given the importance of the percentage figure in paragraph 4.7.13, Pocket considers the wording related to 75% should be added to the main policy text in Policy H7 and not provided as accompanying text. This wording of the policy should make clear that the default position should be the Fast Track Route for schemes providing the required percentage of affordable housing notwithstanding tenure or mix.

User:	Joy Brown

Policy H7 Affordable housing tenure. This specifies tenure split but not location split. In my own area there are developments where the social and affordable housing is confined to specific blocks or specific floors within blocks. This does not facilitate community integration.

User: Mr Dave Putson

I attended the LGA meeting on The New London Plan in LB Bexley on 1st February 2018.

I was generally accepting of the ambitions of the proposals. However, despite having stated that parties had to be careful with their language to describe the proposals I found some of the language less than accurate. let alone acceptable.

We all know that the term "Affordable Housing" is a Tory definition and means that rents would be 80% of the "market rate", whatever that variable is dependent upon location . And of that 80% any affordable housing would only be available in building units of more than 10 homes. Any such development should generally have 35% "affordable homes". Of this allocation 70% should be "social", 30% intermediate. This in real terms offers less than 25% for social housing. The New London Plan offers three newer elements still dubbed "affordable" with lesser criteria, as set by the Mayor. However, everybody already accepts the Tory version of "affordable" so attempting to redefine the terminology will be lost in a sea of semantics. To clarify the London Mayor's position on housing the term "affordable" should be dropped entirely and replaced with the already accepted and understood term "social housing" . This being understood to mean council housing.

The concept still being offered of a "Housing market" to be addressed and should also be challenged. Housing is a right. The right to have a home. The Tories should not be allowed either the terminology or attitude to promote the concept of commodification or monetising of Housing. Council Housing should be a requirement of all builders up to the Mayors specified building numbers, before any private allocations are accepted over and above our housing need.

In Bexley we previously had less than 500 families placed in temporary accommodation, this has now soared, in short order, to 1200 at a cost of £5 million per year. Each family and families children are then detrimentally impacted by the dire consequences of this social status and the attributable poverty. This has impacts on health and well being for the rest of these families lives with consequent shorter life expectations (Michael Marmot : "The Health Gap"). To provide a home for all Londoners is imperative, to eliminate the necessity for temporary housing requirement is imperative, to disown Tory terminology and the attitudes it implies,and imbues debate with, is essential.

If the Mayor's New London Plan does anything it should, I agree, be careful about its use of language. A Labour London Mayor should ensure that he does not use, in a lazy manner, Tory terminology which can effect, and implies an acceptance of, offensive terminology such as those referenced above.

User: Pat Turnbull

Policy H7 Affordable housing tenure

A …The following split of affordable products should be applied to development:

1) a minimum of 30% low cost rented homes, allocated according to need and for Londoners on low incomes (Social Rent / London Affordable Rent)

2) a minimum of 30 per cent intermediate products which meet the definition of affordable housing, including London Living Rent and London Shared Ownership

3) 40 per cent to be determined by the relevant borough based on identified need, provided they are consistent with the definition of affordable housing…

4.7.2. There is a presumption that the 40% to be decided by the borough will focus on Social Rent / London Affordable Rent…

4.7.8 Currently all intermediate rented products such as London Living Rent and Discounted Market Rent should be affordable to households on incomes of up to £60,000. Intermediate ownership products such as London Shared Ownership and Discounted Market Sale (where they meet the definition of affordable housing), should be affordable to households on incomes of up to £90,000. Further information on the income caps and how they are applied can be found in the Annual Monitoring Report.

This entire section needs to be completely altered. All references to affordable products should be replaced with social rented housing. 65 per cent of what is required on all developments should be social rented housing. There should be no leeway for boroughs as there should be no leeway for developers. Almost all of what is proposed above as 'affordable' housing is aimed at households at well above the London median income.

User:	Pat Turnbull

Table 4.3 2017 SHMA findings

For dwellings to be considered affordable, annual housing costs …should be no greater than 40% of net household income…**Amend to read 30 per cent.**

User:	Crest Nicholson PLC
f) Policy H7 – flexibility should be included within the policy to allow for variations to the tenure which in turn may allow for a greater number of affordable dwellings to be provided than would be the case if the tenures set out in the draft policy were rigidly applied as the policy indicates;	

Policy H8 Monitoring of affordable housing

User:	Mr Peter Eversden MBE

Policy H8 should have added a section following C for 'Boroughs should monitor the percentages of the different types of affordable housing they have approved and the number that have been delivered.

Policy H8 D should become E and have "A-C" replaced by 'A-D'

User:	Levitt Bernstein
We would recommend standardising monitoring formats across boroughs.	

User:	Trust for London
We believe proposals for monitoring in the Plan are a strength, and welcome the emphasis on accountability.	

User: London Assembly Green Party Group

The requirements of this policy need to be set out in more detail. Monitoring information provided by boroughs and reported in the London Development Database in a transparent way must include:

- The total amount and percentage of affordable housing for each development in gross and net terms
- The detailed split of affordable tenures for each development, and the amount and percentage of affordable homes at each tenure in net and gross terms
- The amount of money required and received in lieu of provision for any very small or exempt developments
- Details of rents charged and how these compare with previous rents when social rented homes are replaced as part of developments.

These requirements should be set out in supporting text if not added to the policy box.

User: McCarthy and Stone Retirement Lifestyles Ltd.

H8 (173) - Monitoring of affordable housing

Beyond the requirement set out within this DLP policy, Boroughs should also publish how long they hold cash in lieu payments as well as a planned programme.

User:	Home Builders Federation

The policy is unsound because it is ineffective.

We support the provisions of the policy but the Policy should include an automatic review of policies H5 and H6 if housing delivery fails to achieve the London-wide target of 65,000dpa in 2019.

User:	Stonewall Housing

POLICY H5/POLICY H8: Stonewall Housing welcomes the London Plan's ambitions to deliver more supply of more affordable housing which includes specific targets for local authorities. However, to ensure that these targets reach all communities it should also include targets for groups that share protected characteristics and not simply the supply numbers. For this to take place the Mayor should encourage all developers and local authorities to collect data on sexual orientation and gender identity to ensure their developments and plans are addressing the needs of our communities.

User: Newham Union of Tenants

H8 Monitoring affordable housing

We propose that policy H8A also require that boroughs to monitor how much affordable housing are delivered through section 106 agreements.

User:	London Borough of Lambeth

Lambeth supports the proposed approach. However, the information requirements associated with this policy will have significant resource implications, so boroughs need an appropriate transition period before it comes into force. The full implementation of this provision needs to commence after final publication of the new London Plan.

User: London Tenants Federation

4.8.1 Policy H8 Monitoring affordable housing

We propose that policy H8A also require that boroughs to monitor how much affordable housing is delivered through section 106 agreements.

User:	London Borough of Merton

Support with amendments This Policy is supported however it needs to be consistent with Policy H3 (and also suggested changes to Policy H5) by setting out that monitoring of affordable housing should be in net terms taking account homes lost through demolition or change of use / tenure.

User:	London Borough of Haringey
The Council supports this policy	

User:	London Borough of Lewisham
We acknowledge the additional resources that will be required in London Boroughs in order to monitor affordable housing in line with H8.	

User:	London Borough of Brent
The policy is supported.	

User:	Save Swiss Cottage

H8 Monitoring affordable housing
8.1 We propose that policy H8A also require that boroughs to monitor how much affordable housing is delivered through section 106 agreements.

User:	London Borough of Bromley

The Council supports the above policy that will ensure affordable housing delivery will be monitored effectively.

User:	London Borough of Hounslow
LB Hounslow supports this policy	

User:	London Councils

Boroughs often record data on affordable housing delivery through annual monitoring reports and will continue to do so, meeting the criteria set out in this draft policy.

Lack of available land for affordable housing development in boroughs and restrictions around the ability to combine monetary contributions in lieu with grant and right to buy receipts mean that boroughs can struggle to spend affordable housing contributions. The GLA can work with boroughs and registered providers in order to establish how these in lieu monetary contributions can best be spent to maximise the supply of affordable housing.

User:	London Borough of Tower Hamlets

We are supportive of the proposed monitoring and publication. We presume that this will form part of the London Development Database to ensure all boroughs provide the same information and it is clearly accessible to residents.

User:	Royal Borough of Kingston
Monitoring will be undertaken by RBK as described in this policy.	

User:	London Borough of Waltham Forest

We consider that these two policies (H3 and H8) could be merged. We also agree with the principle of Policy H8 part D; but consider that this will take significant additional resource and funding by individual boroughs. Our proposal to help alleviate the resourcing pressure for boroughs is a pan London resource that could be provided to Boroughs with limited resources.

User: HFFTRA

H8 Monitoring affordable housing

8.1 We propose that policy H8A also require that boroughs to monitor how much affordable housing is delivered through section 106 agreements.

User:	London Borough of Hackney

Support the policy however Hackney seek clarification on whether part D prescriptively describes as a monitoring requirement that s106 agreements and review mechanism outcomes be available to view in the public domain.

User:	London Borough of Wandsworth

The Council supports the policy but flexibility should be offered on the level of monitoring detail required in the short term to give the opportunity for the Council to adapt its monitoring process to ensure more detailed reporting in the longer term.

User:	London Borough of Richmond Upon Thames

The Council supports the policy but flexibility should be offered on the level of monitoring detail required in the short term to give the opportunity for the Council to adapt its monitoring process to ensure more detailed reporting in the longer term.

User:	London Borough of Harrow
The Council support this policy.	

User:	London First

As set out in response to H.5, we welcome the Mayor taking a more robust approach to payments in lieu; policies B and D will help ensure that more affordable homes are built.

User: TUC London, South East and East of England

Policy H8: Monitoring of affordable housing

There has been a collapse in trust in housing regeneration projects associated with evidence of regeneration schemes where tenants were not re-housed on the new scheme in suitable accommodation with low cost rents and secure tenancies. Providing the ‘so called’ affordable housing ‘off-site’ is often a cause of major resentment and mistrust, and either is, or can be characterised as ‘estate cleansing’, dispersing communities, and is contrary to the commitments made to build mixed and diverse communities in this iteration of the London Plan.

User: Just Space

Policy H8 Monitoring of affordable housing

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

User:	London Federation of Housing Cooperatives

H8 Monitoring affordable housing

8.1 We propose that policy H8A also require that boroughs to monitor how much affordable housing is delivered through section 106 agreements.

User:	Chartered Institute of Architectural Technologists

Policies H6, H7, H8, H9, H10, H11, H12, H13, H14, H15, H16, H17 & H18

We are in agreement with the proposals contained in the plan.

User:	British Property Federation
We support the policy.	

User: 313-349 Ilderton Road LLP

Policy H8 Monitoring of affordable housing sets out that Boroughs are required to have clear monitoring processes to ensure that the affordable housing secured on or off site is delivered in line with the Section 106 agreement; Monitoring processes should ensure that any cash in lieu payments are used to deliver additional affordable housing; Boroughs should ensure that where a review mechanism is triggered, it is implemented and the number of extra homes delivered, or cash in lieu secured is recorded; Boroughs must publish monitoring information on A-C annually to ensure transparency in the planning process and so the public know how funds are being spent. This information should be shared with the GLA so it can be part of the annual monitoring process.

We support the principle of affordable housing monitoring and cash in lieu payments being used to deliver additional affordable housing.

User:	Benhill Residents
We propose that policy H8A also require that boroughs to monitor how much affordable housing is delivered through section 106 agreements.	

User: Elaine Chambers

H8 Monitoring affordable housing

We propose that policy H8A also require that boroughs to monitor how much affordable housing is delivered through section 106 agreements.

User:	Earls Court Public Sector Tenants' Assoc

We propose that policy H8A also require that boroughs to monitor how much affordable housing is delivered through section 106 agreements.

User:	London Borough of Newham

Policy H8 Monitoring Affordable Housing

LBN are supportive of this policy in principle.

User:	London Borough of Sutton
SUPPORT. The London Borough of Sutton supports Policy H8.	

User: Blackheath Society

Policies H5 Delivering affordable housing; H6 Threshold approach to applications; H7 Affordable housing tenure; and H8 Monitoring affordable housing: We support the introduction of these policies and the thrust of the draft supporting text. As noted earlier in connection with Policy D8, we believe there should be a much higher level of transparency/accountability in relation to viability assessments to enable informed debate with interested parties other than the local authority. We strongly support Policy H7 on genuinely affordable housing and in particular the treatment of London Affordable Rent at Policy H7A1 and paragraph 4.7.4. We welcome the prospect of compliance with affordable housing targets being monitored more rigorously than has been the case to date.

User:	Clarion Housing Group

We agree with the need to monitor delivery of affordable housing and other contributions Developers' obligations in the form of S106 and Mayoral and local CIL contributions have to be

Developers' obligations in the form of S106 and Mayoral and local CIL contributions have to benegotiated transparently and published. CIL levels need to be set at realistic levels, reviewed regularly so as not act as a barrier to development. The community-based contributions from developers such as housing associations or Community Land Trusts or social purpose vehicles which enable affordable housing to function well should be monitored and recognised.

User:	London Borough of Ealing

The Council supports these policies which are largely based on the previously published Affordable Housing and Viability Supplementary Planning Guidance (SPG), August 2017.

User: Mr Gary Hayes

H8 Monitoring affordable housing

8.1 We propose that policy H8A also require that boroughs to monitor how much affordable housing is delivered through section 106 agreements.

User:	Andrea Carey Fuller
We propose that policy H8A also require that boroughs to monitor how much affordable housing is delivered through section 106 agreements.	

User:	Elephant Amenity Network

H8 Monitoring affordable housing

8.1 We propose that policy H8A also require that boroughs to monitor how much affordable housing is delivered through section 106 agreements.

User:	Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living

H8 (173) - Monitoring of affordable housing

Beyond the requirement set out within this DLP policy, Boroughs should also publish how long they hold cash in lieu payments as well as a planned programme.

User: Urbanissta

Policy H8 Monitoring of Affordable Housing

Policy H8 requires boroughs to have a clear monitoring process to ensure that affordable housing can be delivered on or off site in line with the S106 agreement.

Comment: This Policy should include a trigger for the review of policy H5 and H6 if the target of 65,000 dpa is not achievable.

Policy H9 Vacant building credit

User:	Royal Borough of Kingston
Support, Vacant Building Credit is rarely applicable in London and the criteria are appropriate to determine where it should be applied.	

User:	Westminster City Council

The vacant building credit is set out in national guidance and the Mayor cannot simply disapply it. Its application is a matter for local planning authorities to consider in each case (and they would be open to challenge if they did not). Equally, administration of the Community Infrastructure Levy is a matter for boroughs as collecting authorities and the London Plan cannot tell them how the payable amount should be calculated (the vacancy test is part of the calculation under regulation 40 of the CIL Regulations; it is not a relief as paragraph 4.9.3 suggests).

User:	London Borough of Southwark

The New Southwark Plan does not accept the Vacant Building Credit in any circumstances as the viability of a scheme will always be considered on a case-by-case basis.

The council requests the Mayor inserts the caveat that the Vacant Building Credit should not be applied at all where a borough Local Plan proscribes its use.

User:	London Borough of Richmond Upon Thames
Welcome the stricter assessment of when VBC is applied and the evidential test required.	

User:	London Borough of Harrow
The Council support this policy.	

User:	Royal Borough of Greenwich

Support the recognition that in most circumstances the application of the vacant building credit will not be appropriate. Consider B and C are reasonable in the London context and provide the necessary clarity regarding the limited circumstances that would justify application of the credit.

User: Berkeley Group

Policy H9 Vacant building credit

~~A The Vacant Building Credit is unlikely to bring forward additional development in London, therefore in most circumstances, its application will not be appropriate in London. However(strikethrough)~~, There may be some limited circumstances where the vacant building credit would, in line with the intention of the credit, provide an incentive for development on sites containing vacant buildings that would not otherwise come forward for development. As part of assessing whether this is the case, decision-makers are advised to take account of the criteria below as well as locally-specific factors influencing the site.

B In the limited circumstance where a borough feels the credit should be applied, boroughs ~~are advised to(strikethrough)~~ may consider applying the credit only where all of the following criteria are met:

C To demonstrate that a building has not been made vacant for the sole purpose of redevelopment, an applicant will be required to demonstrate that it has been vacant for a continuous period of at least ~~five~~(strikethrough) three years before the application was submitted and will also be required to provide evidence that the site has been actively marketed for at least two of those five years at realistic prices.

User:	Ministry of Housing, Communities & Local Government

The Secretary of State’s Letter in response to the draft London Plan consultation refers to inconsistencies with national policy, including the NPPF.

The Vacant Building Credit was announced in the written ministerial statement of 28th November 2014 and is set out in para 21-23 of the NPPG on Planning Obligations.

The Mayor should consider whether the approach set out in the Plan is consistent with national policy.

User:	U+I

The indiscriminate exclusion of national policy across London is inappropriate and likely to reduce development viability – in our view it should be deleted. If retained, a variety of sites within areas otherwise allocated under the exclusion in paragraphs b 2) and b 3) would become unviable, such that criterion b 2) and b 3) should be deleted. To avoid unnecessary sterilisation, the period for ‘required’ vacancy should be reduced to two years prior to implementation of alternatives.

User:	Chartered Institute of Architectural Technologists

Policies H6, H7, H8, H9, H10, H11, H12, H13, H14, H15, H16, H17 & H18

We are in agreement with the proposals contained in the plan.

User:	British Property Federation
We support the policy.	

User: Crest Nicholson PLC

We consider this Policy to be unsound and unjustified as currently drafted and amendments are required.

The vacant building credit (VBC) was introduced by the Government through its Written Ministerial Statement of 28 November 2014 and so is national planning policy. It is also covered in the Planning Policy Guidance. The VBC was one of the measures introduced by the Government to help support small developers, custom and self-builders by unlocking small scale development.

Policy H9 seeks to effectively dis-apply the VBC in a blanket fashion which is contrary to national policy and is unjustified. Crest Nicholson does not agree with the Mayor's interpretation of how a VBC could be justified and applied as set out in Part B which sets out four criteria all of which need to be satisfied. The national policy and guidance (Paragraph: 023 Reference ID: 23b-023) does not include the caveat set out in Part B(3) which should be deleted. Further Part B(1) should be amended to be consistent with national policy and guidance so it states "the building has been abandoned at the time the application is submitted". This is important as "not in use" can be interpreted differently to "abandoned" in law.

The claim that the VBC is unlikely to bring forward much additional development in London is unsubstantiated and the policy removes the ability for VBC to help contribute to delivery of brownfield development. VBC may help to improve viability of brownfield sites by reducing the scale of S106 obligations expected. In view of the emphasis in the London Plan on bringing forward small sites the Mayor's case for removing the VBC is unjustified.

We consider that the application of the national planning policy on the VBC is a matter that it is more proper for the London LPAs to assess as part of the production of Part 1 Local Plans. Part A of the policy should be re-drafted to read:

"A ~~The Vacant Building Credit is unlikely to bring forward additional development in London, therefore in most circumstances, its application will not be appropriate in London~~. The London LPAs should have regard to the national planning policy on the Vacant Building Credit when preparing their Local Plans. Subject to evidence, it may be appropriate to limit the application of the credit to circumstances where the criteria in Part B of this policy apply."

The rest of the text of Part A should be deleted.

User:	313-349 Ilderton Road LLP

Policy H9 Vacant building credit sets out that the Vacant Building Credit is unlikely to bring forward additional development in London, therefore in most circumstances, its application will not be appropriate in London.

We do not support the loss of Vacant Building Credit as this is not in accordance with national planning policy and guidance. The London Plan is therefore unsound as currently drafted in this regard.

User: Fairview New Homes

We objected to the Mayor's approach to Vacant Building Credit in the Affordable Housing SPG and repeat that objection to Policy H9. The Vacant Building Credit was introduced via the Written Ministerial Statement of 28 November 2014.In London the instances where VBC will be relevant are diminishing, but we would contend that it should remain an option to kick start regeneration on larger sites where development costs are high and revenues currently suppressed.

Fairview asserts that this section of the draft London Plan should be redrafted or removed altogether, because the restrictions imposed on the operation of the Vacant Building Credit are so far-reaching as to nullify its effect and we believe it is outside the remit of the draft London Plan to effect removal of national planning policy. If the policy remains it will make the Draft London Plan unsound.

Recommendation
Vacant Building Credit is National Planning Policy and should be removed from the guidance provided by the draft London Plan. Alternatively, and as suggested by the HBF, the policy should be reworded as follows:

"A ~~The Vacant Building Credit is unlikely to bring forward additional development in London, therefore in most circumstances, its application will not be appropriate in London.~~ The London LPAs should have regard to the national planning policy on the Vacant Building Credit when preparing their Local Plans. Subject to evidence, it may be appropriate to limit the application of the credit to circumstances where the criteria in Part B of this policy apply."

The rest of the text of Part A should be deleted.

User:	London Borough of Newham

Policy H9 Vacant Building Credit

LBN are supportive of this policy in principle and welcome clarification from the GLA in this regard.

User:	London Borough of Sutton

SUPPORT. The London Borough of Sutton considers the Policy H9 on vacant building credits provides greater clarity on its application in London and the ‘London approach’ will assist with the delivery of affordable housing.

User: PRP

The Mayor is unequivocal in his stance that Vacant Building Credit (VBC) is unlikely to bring forward much development in London and is not deemed as appropriate.

In reality, VBC was introduced through a Written Ministerial Statement in 2014 and is applicable throughout the country regardless of geographical location. It is therefore not within the remit of the Mayor to decide not to apply this in London due to concerns over the provision of affordable housing.

User: Persimmon Homes

The policy is unsound because it is inconsistent with national policy and because it is unjustified.

Vacant building credit is established through national policy and was introduced to promote development on brownfield sites containing vacant buildings. The current government guidance is considered fit for purpose and does not need to be reinterpreted via the London Plan.

A significant element of the new housing in London will be built upon brownfield sites and therefore the Mayor should be less dismissive of its application and ability to aid development viability. The necessity of this policy is questioned. In any event, the criteria in part B need to be amended to reflect national guidance in the PPG.

User:	London Borough of Ealing

The Council supports this policy and, in particular, agrees with the assertion that: “in most circumstances, its application will not be appropriate in London.”

User: National Health Services England, National Health Services Improvement, Community Health Partnerships.

The NHS supports the legitimate use of vacant building credit, in line with the government's intentions. The NHS has benefited from the application of the credit where it is seeking to obtain a residential planning permission for a surplus property, in line with NHS Estate Code, prior to its disposal on the open market. In such cases, the credit has meant that the NHS can advance policy-compliant schemes with lower affordable housing provision. This has improved the viability position of complex vacant sites and assisted in the delivery on additional homes. It has also helped the NHS to reduce the revenue costs associated with holding vacant property and generate capital receipts through disposals, both of which increase the amount of money that is available to spend on the delivery of new and improved healthcare services and facilities.

There is a concern that the test that must be met to demonstrate that a building has not been made vacant for the sole purpose of redevelopment is too strict. The very high bar set by this policy, in terms of the overall period of vacancy required, would cause delays to the disposal of vacant property, which would hold-up the delivery of much needed new residential development and result in increased holding costs for land owners.

12.6. It also appears to be at odds with Planning Practice Guidance (PPG), which states that vacant building credit "is intended to incentivise brownfield development, including the reuse or redevelopment of empty and redundant buildings" (Paragraph: 023 Reference ID: 23b- 023-20160519). The test that must be met to demonstrate that the building has not been made vacant for the sole purpose of redevelopment would act to materially reduce this incentive and is therefore not consistent with national policy.

12.7. The test should be changed to reflect the occupancy test for the Community Infrastructure Levy (CIL), which requires buildings to have been occupied for six months in the three years immediately preceding the date on which planning permission first permits the development. This would cause less delay and provide an incentive for development. It would also be in line with national policy and generally accepted approaches to such tests.

12.8. In relation to the restriction of vacant building credit being applied to sites that are protected for an alternative use other than residential, it is suggested that additional wording is addedto the policy supporting text to make it clear and prevent misinterpretation. The supporting text should state that this restriction would not apply where the loss of an otherwise protected use would be acceptable under other proposed policies in the Draft New London Plan.

There is currently a risk that the wording of the policy could be interpreted to mean that vacant building credit should not be applied in cases where social infrastructure or health and social care facilities would be lost, even though such a loss could be in accordance with proposed Policies S1 and S2.

We suggest the following revised wording for Policy H9:

A. The Vacant Building Credit is unlikely to bring forward additional development in London, therefore in most circumstances, its application will not be appropriate in London. However, there may be some limited circumstances where the credit would, in line with the intention of the credit, provide an incentive for development on sites containing vacant buildings that would not otherwise come forward for development. As part of assessing whether this is the case, decision-makers are advised to take account of the criteria below as well as locally-specific factors influencing the site.

B. In the limited circumstance where a borough feels the credit should be applied, boroughs
are advised to consider applying the credit only where all of the following criteria are met:
1. the building is not in use at the time the application is submitted
2. the building is not covered by an extant or recently expired permission
3. the site is not protected for alternative land use
4. the building has not been made vacant for the sole purpose of redevelopment.

C. To demonstrate that a building has not been made vacant for the sole purpose of redevelopment, an applicant will be required to demonstrate that it has been in lawful use for a continuous period of fewer than six months within the period of three years vacant for a continuous period of at least five years before the application was submitted and will also be required to provide evidence that the site has been actively marketed for at least two of those three five years at realistic prices.

We suggest that the following text is added to form a new Paragraph 4.9.3 between proposed Paragraphs 4.9.2 and 4.9.3:

For the avoidance of doubt, the application of vacant building credit should beconsidered in cases where the loss of social infrastructure or health and social care facilities would accord with Policies S1 and S2, as in such cases sites should not be regarded as protected for alternative land use.

User:	Taylor Wimpey UK

Policy H9 Vacant building credit

There is no sound basis for removing the VBC as set out in the proposed policy.

VBC as introduced by the Government through its Written Ministerial Statement of 28 November 2014 should continue to apply to London.

User: Parkview International Ltd Group of Companies

Draft Policy H9 – Vacant Building Credit

We disagree strongly with the statement that “The Vacant Building Credit is unlikely to bring forward additional development in London”. The Credit should not be viewed in isolation but is simply one of numerous measures the cumulative effect of which, it is hoped, is to bring forward much needed additional development, particularly of affordable housing where profitability is necessarily marginal.

Following the decision in the Court of Appeal on the ‘West Berkshire’ case National Planning Practice Guidance reintroduced in May 2016 the Vacant Building Credit.

The Government introduced the vacant building credit as incentive for brownfield development on sites containing vacant buildings. Where a vacant building is brought back into any lawful use, or is demolished to be replaced by a new building, the developer should be offered a credit equivalent to the existing gross floorspace of relevant vacant buildings when the local planning authority calculates any required affordable housing contribution. Affordable housing contributions may be required for any increase in floorspace.

We note that the draft London Plan’s proposes increases in planning and Community Infrastructure Levy contributions relating to:

- Affordable housing requirements as set out draft policies H5, H6 & H7
- The funding of transport infrastructure through planning – Draft Policy C9
- Draft Policy S12 – which seeks make London “a zero carbon city” and where residential development should aim to achieve 1- per cent over part L of the Building Regulations.

It is our opinion that the cumulative effects of these and other draft policies of the draft London Plan will negatively affect the viability of residential led regeneration developments which are required to come forward to meet London’s growing housing of London as set out in Table 4.1 of the draft plan over the plan period and so run directly counter to one of the principal aims of the Plan, namely to encourage increased supply of affordable housing.

Removing the vacant building credit can only further negatively affect the viability of residential led regeneration projects and therefore makes it less likely that the affordable housing targets of the Plan will be achieved.

Recommendation

We consider that the Draft Policy needs to be deleted because:

- The Policy is contrary National Planning Guidance of May 2016.
- The draft policy will not incentivise residential re-development of vacant buildings in London because the viability of such developments will be at greater risk when combined with other planning obligations and MCIL requirements as proposed in the draft London Plan as outlined in this representation. This also makes it less likely that brownfield sites will be developed, leading to greater pressure to develop green spaces.

User: Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living

H9 (174) - Vacant Building Credit (VBC)

The NPPG has distinct criteria for where and how VBC should apply. It does not prescribe a time frame against which individual buildings should be assessed.

The intention of this policy is to incentivise vacant land to be brought forward sooner than it would otherwise have. We believe there are instances in London where this policy would enable vacant buildings to be brought forward for housing sooner than otherwise would be the case and the Mayor should avoid encouraging a wholesale ban on VBC usage across London.

Objection: This policy is not positively prepared. We also consider the policy to be inconsistent with national planning policy. We respectfully request that it should be removed.

User:	London Borough of Camden
The Council agrees that it is unlikely to be appropriate to apply the Vacant Building Credit to sites in London, and therefore supports Policy H9.	

Policy H10 Redevelopment of existing housing and estate regeneration

User: Ms Deirdre Woods

H10

The London Plans says:

Policy H10

Redevelopment of existing housing and estate regeneration

A

Loss of existing housing is generally only acceptable where the housing is replaced at existing or higher densities with at least the equivalent level of overall floorspace. This includes the loss of hostels, staff accommodation, and shared and supported accommodation that meet an identified housing need, unless the existing floorspace is satisfactorily reprovided to an equivalent or better standard.

B

Where loss of existing affordable housing is proposed, it should not be permitted unless it is replaced by equivalent or better quality accommodation, providing at least an equivalent level of affordable housing floorspace, and generally should produce an uplift in affordable housing provision. All such schemes are required to follow the Viability Tested Route (see Policy H6 Threshold approach to applications).

C

For estate regeneration schemes the existing affordable housing floorspace should be replaced on an equivalent basis i.e. where social rented floorspace is lost, it should be replaced by general needs rented accommodation with rents at levels based on that which has been lost, and the delivery of additional affordable housing should be maximised. All schemes should follow the Viability Tested Route (see Policy H6 Threshold approach to applications)

Comments:

Food production must be at the heart of estate regeneration helping to improve the social economic and physical environment in which homes located. Regeneration and intensification must include food production areas for residents,.This will help to alleviate densification problems giving residents productive places to be outside doing productive work, helping to live healthier, less expensive and less isolated lives.There are many aspects of the food industrial complex that need addressing that are far beyond the scope of London's Mayor but he must set the direction and vision for a London less dependant on ecologically and financially expense monopoly of food producers. 80% of the worlds food is produced by small family farms and subsistence farmers (FAO, 2014). That does not mean scrapping a living at survival levels but producing enough food to give their families a good standard of living. This reality translated into a London context is a vision of every person having access to a certain amount of land, either around their house or in nearby community garden or farms to produce food. This means each new home needs to have this land committed to it near by. There is also a need for resources necessary for food production such as water, seeds, trading places and keeping of bees, small livestock and fowl.

Amended policies to read

Redevelopment of existing housing and estate regeneration

A

Loss of existing housing is generally only acceptable where the housing is replaced at existing or higher densities with at least the equivalent level of overall floorspace including food growing spaces as either individual spaces or community spaces. This includes the loss of hostels, staff accommodation, and shared and supported accommodation that meet an identified housing need, unless the existing floorspace is satisfactorily reprovided to an equivalent or better standard.

B

Where loss of existing affordable housing is proposed, it should not be permitted unless it is replaced by equivalent or better quality accommodation, providing at least an equivalent level of affordable housing floorspace, and generally should produce an uplift in affordable housing provision and include food grpwing spaces as either individual spaces or community spaces. All such schemes are required to follow the Viability Tested Route (see Policy H6 Threshold approach to applications).

C

For estate regeneration schemes the existing affordable housing floorspace should be replaced on an equivalent basis i.e. where social rented floorspace is lost, it should be replaced by general needs rented accommodation with rents at levels based on that which has been lost, and the delivery of additional affordable housing including food growing spaces as either individual spaces or community spaces should be maximised. All schemes should follow the Viability Tested Route (see Policy H6 Threshold approach to applications)

User:	Barnet Society

Policy H10 – Redevelopment of existing housing and estate regeneration

We support the proposal that no general needs rented accommodation or supported housing should be lost on regeneration schemes.

User: Clarion Housing Group

It is positive that the Mayor is committed to monitor the numbers of homes demolished and replaced and that replacement of affordable homes is on the basis of floor space rather than numbers of units replaced. Policy D6- D refers to the measures of density required for a proposal (all schemes to provide number of units per hectare; number of habitable rooms per hectare; number of bedrooms per hectare; and number of bed-spaces per hectare.)

We feel that floor space is the best measure to be considered alongside unit mix and sizes, and that the Best Practice Guidance “Better Homes for Local People” acknowledges that floorspace is an issue to be discussed with residents.

However the wording in the Plan that calls for existing or higher densities at equivalent floor space

leads to the risk to provision of the same floor space subdivided into smaller (typically one bed / studio) units. This may achieve the aim to increase overall number of affordable housing units or avoid net loss of floor space but may not provide the mix and size of homes that a scheme

needs. Clarion’s Sherwood Close scheme in Ealing is an example which replaces an inappropriate unit mix (60% single bed units / bedsits) with a greater mixture of one and two bed homes, closer meeting the existing community’s needs within the same floor space. Residents who wish to return to a regenerated scheme may want to downsize or have more space for a larger family, so it can not be assumed that the bedspace requirement for social tenants will remain the same during the programme of the regeneration. Delivering a suitable mix for new or future residents is equally important.

Clause H10-A

Clarify: ***That the measure of density reflects a balance of units, habitable rooms, bedrooms and bedspaces suitable to the needs of the regeneration scheme, and that the balance may need to be adjusted to accommodate the needs of the existing residents who want to return to the estate and future residents.***

User:	Clarion Housing Group

Clause H10-B

“Where loss of existing affordable housing is proposed, it should not be permitted unless it is replaced by equivalent or better quality accommodation,:

London’s housing stock is ageing. While most social housing estates meet the Decent Homes Standard, many are increasingly failing to meet modern expectations and nearing the end of their useful lives. The replacement of poor quality unsatisfactory or unsuitable homes with ones of a better quality is a key reason for regeneration. We are committed to maintaining the quality of our assets and ensuring that our residents are living in good quality homes.

User: Clarion Housing Group

The existing London plan para 3.82 is far more responsive to the particular local housing need and overarching regeneration aims of fostering a more balanced mix of tenure and incomes. It also recognises that redevelopment of a particular scheme or estate needs to be seen as part of a wider picture of the regeneration of larger areas. So we would wish to see the retention of the existing London plan para 3.82 ensuring that these local circumstances and contribution to a boroughs wider plans are taken into account.

Clause H10-B) Add: ***The following local circumstances and contribution to a Borough's wider regeneration plans should be are taken into account when considering the mix of housing provided. These include:***

- ***the regeneration benefits to the local community;***
- ***the proportion of affordable housing in the surrounding area and the need to provide mixed and balanced communities; and***
- ***the amount of affordable housing intended to be provided elsewhere in the borough.***

User:	Clarion Housing Group

The comment above sets out the detailed clarification needed around like-for-like replacement of space and that floor space is the best measure. There is a similar issue, requiring clarification, about rent levels and tenure of the new homes. We'd agree with the principle of maintaining at least the same number of rental homes for households on low incomes. Affordable housing current includes a mix of products (the NPPF current definition covers rental homes at social rent (London Affordable Rent), affordable rent or other Low Cost Home Ownership products such as London Living Rent or Shared Ownership Rent levels in different products may be similar but under different tenure conditions. Delivering the maximum additional housing may require a mix of these affordable products. This diversity of products means that over time when residents move out, the most suitable tenure need can be reassessed. Fixing a tenure type in perpetuity might limit future responsiveness. .

User: Clarion Housing Group

We believe that we are already able to work with our residents in a variety of ways to ensure that the majority of occupants feel reasonable solutions are achieved. We already record and demonstrate that we are acting on the outcomes of resident engagement / consultations. Sometimes ballots might be a useful approach but not as a blanket measure and we know that working closely with residents is the only way that schemes will proceed successfully. Much of the suggested good regeneration practice in the Mayor's guidance is actually normal practice for housing associations (See g15 response to the Draft Estate Regeneration Guidance and " Meeting the Challenges of Urban Renewal" report) so for example, Clarion's existing approach is to make all occupants (leaseholder included) a fair and reasonable offer (see Clarion's Merton offer) within the cost and affordability envelope.

We support the aims and intentions of the Mayor Best Practice Guide but as our response to the consultation on "Proposed new funding condition to require resident ballots in estate regeneration" explores in detail we are concerned that a blanket requirement for ballots for GLA funded redevelopment will have unintended consequences:

- The proposed eligibility criteria for ballots are complicated to verify. We have concerns about the difficultly of confirming who is eligible to vote, and the potential for dissention that might arise from close results, potential fraudulent eligibility or coercion that might occur.
- A ballot gives non–social leaseholders and homeowners the power to veto whether social housing gets investment. They will have different motivations in a vote.
- A ballot can only be a subjective snapshot at one point in time – the timing will be very

  sensitive. It risks being a referendum on a complex matter at a point where it is unlikely that a holistic picture of the scheme will be known. We feel it is better to have a continuous process of collective decision making throughout the whole process rather than a stop / go decision relatively early on.

- Ballots will slow down and increase the risk in what are already long drawn out, and uncertain regeneration programmes, and are a disincentive to investing early on in the process at just the point when the focus should be on investigating residents' needs and exploring the underpinning master planning principles. If the ballot fails then there will be abortive costs against any possible works to the estate. For some schemes refurbishment isn't an option, and 'do nothing' is just as undesirable, but once a no vote has been made, removing the option for any demolition will mean that any regeneration plans will halt.
- These increased risks may restrict the appetite to proceed with plans to improve existing estates leaving residents in poor quality accommodation or for landlords to seek to sell estates which are in need of substantial remodelling.

Until these detailed aspects of the Best Practice Guide are resolved (in line with MCH:LG's over regeneration guidance) their inclusion in the London plan may restrict the progress and appetite for further regeneration schemes in the Capital.

Para 4.10.3: Add: wherever possible

User:	Footwork Architects Limited

- In Policy H10 insert a paragraph D to explain the need to take into account the potential loss of social heritage, identity and character, through demolition as part of estate regeneration

User:	London Borough of Ealing

The Council supports this policy. We recognise the need to protect existing tenants' ability to remain on site in relation to their affordable housing needs.

However, some flexibility does need to be exercised to reflect local circumstances. Such regeneration schemes are often a very complicated process balancing up a wider range of issues than the affordable housing provision element.

User: Peabody

We are participating in a joint response with the g15 which will address the Mayor’s policy on regeneration in more detail.

As an organisation whose primary development goal is to maximise provision of low-cost affordable rented homes, we recognise the Mayor’s concern that regeneration should not result in lower levels of affordable housing.

We are going ahead with two successful regeneration schemes at Parkside (Lewisham) and St John’s Hill (Wandsworth). Both of these will improve the quality of the homes as well as significantly increasing the number of units. In the future we are concerned that schemes like this would be too difficult and lengthy to progress. The housing market is getting increasingly difficult to operate in, especially for market sale which funds our affordable rented homes. Additional delays could prevent these schemes from happening.

However, we have concerns that the Draft Plan is overly prescriptive in its requirements and does not allow sufficient flexibility to address the needs of current and future residents. Once again we would like to draw attention to the conflict between policies that explicitly prioritise increased density and optimum use of land, and policies that make doing so increasingly challenging or even unviable. It should be clearer which takes precedence out of intensification or these policies.

User: Mr Martin Saggers

My wife and I bought in 2013, and specifically looked for a 3 bedroom property. I needn't state that this took years to save for, as I'm sure many others are in this boat too. Since buying, we've done a number of improvements to it which would have increased it's value (new kitchen, new boiler/radiators).

It would appear from the plan that people in 3 bedroom homes living, as I do, on the Benhill estate in Sutton are at risk of losing the homes we've each fought hard to attain in the first place.

Despite mine and my wife's efforts (her taking on extra tuition work in addition to an already demanding schedule as a teacher, and my commuting 3 hours a day to get to my place of work), we would be completely priced out of the market if we were to lose our home and attempt to find a property of the same requirements. The latest development on our high street for flats is an average of £350K - £400 for a property vastly smaller than we have now. We'd therefore have to look outside of London to afford a home, and this in turn would put even more on to our commute times. This change doesn't just impact home life, but work life also!

Having our home taken away puts us in an impossible position, namely because together we earn too much to be able to claim for benefits, but not enough to be able to afford rents as they are in Sutton. And just so you're aware, my mortgage is currently approx £900 per month. The average rental for a 3 bedroom property in my current postcode (or within half a mile)? Half as much again. Yes, the average is approx £1500 per month - a colossal jump in our monthly outgoings, I'm sure you'll agree.

When Sutton 2031 was first raised as an issue by the residents of the Benhill Estate, we finally were told by council officials that if we were to lose our home to redevelopment, we'd be offered a like for like property. Your overriding plan would seem to contradict that.

Sutton is known as one of the best places to raise a family, but if there are fewer and fewer families able to live here, this is a reputation we will lose.

I don't expect much, if any, reply from your office. But I wanted it in writing of my objections to this proposed plan.

User:	Hornsey & Wood Green Labour Party

We agree that where there is loss of existing housing it should be replaced by better quality housing of the same or greater density, at rents that are the same as what has been lost, and if possible, a greater proportion of affordable housing floorspace. The redevelopment of specific areas should not result in an increase in rent and all tenants should be able to return on the same or better terms than their existing ones.

User: Mr Gary Hayes

Policy H10 – redevelopment of existing housing and estate regeneration

9.1 Proposed alternative policy text to H10B ‘Where loss of existing affordable housing is proposed, it should not be permitted unless it is replaced by ~~equivalent or~~ betterquality accommodation, providing at least the equivalent level of affordable housing floorspace, flat sizes, density and tenure. Rental and service charge costs should be as existing. ~~and generally should produce an uplift in affordable housing provision~~. Where additional homes are delivered this should comprise 65% affordable homes (50% social rented and 15% intermediate). Refurbishment options, to demolition. should always be considered.

9.2 Proposed additions / alterations to (c) For estate regeneration schemes the existing affordable housing floorspace should be replaced at least on an equivalent basis (including floor space, flat size and density). Any replacement social housing should be of the same tenure, rents and service charges as existing. Where additional homes are delivered this should comprise 65% affordable homes (50% social rented and 15% intermediate). Refurbishment rather than demolition should always be considered. A thorough comparative analysis of social, economic and environmental costs and benefits should always be carried out.

9.3 We propose addition of the following – ‘In all instances involving loss of social rented homes through estate regeneration (whole estate or sections of estates), should only go ahead where agreed by the majority of tenants, determined via a ballot.’

User:	Sean Creighton

Given the concerns about the way in which Croydon’s Brick by Brick Company is proposing additional housing on Council estates against the wishes of residents, the Croydon Assembly supports the need for a requirement that any schemes to estates should be subject to a ballot of residents.

User: Andrea Carey Fuller

Proposed alternative policy text to H10B ‘Where loss of existing affordable housing is proposed, it should not be permitted unless it is replaced by ~~equivalent or~~ better-quality accommodation, providing at least the equivalent level of affordable housing floorspace, **flat sizes, density and tenure. Rental and service charge costs should be as existing.** ~~and generally should produce an uplift in affordable housing provision.~~ **Where additional homes are delivered this should comprise 65% affordable homes (50% social rented and 15% intermediate). Refurbishment options, to demolition. should always be considered.**

Proposed additions / alterations to (c) For estate regeneration schemes the existing affordable housing floorspace should be replaced **at least** on an equivalent basis **(including floor space, flat size and density)**. **Any replacement social housing should be of the same tenure, rents and service charges as existing. Where additional homes are delivered this should comprise 65% affordable homes (50% social rented and 15% intermediate). Refurbishment rather than demolition should always be considered. A thorough comparative analysis of social, economic and environmental costs and benefits should always be carried out.**

We propose addition of the following – ‘In all instances involving loss of social rented homes through estate regeneration (whole estate or sections of estates), should only go ahead where agreed by the majority of tenants, determined via a ballot.’

User: Mr Adrian Whyatt

Although I don't live in London I do have a number of friends, with hoarding problems, who do and who may therefore be affected by any changes which can be brought about.

I have major concerns over the way councils, environmental health and social services approach hoarding. They largely seem to assume that hoarders are either dirty people or are mentally incapable, which clearly is far from the truth. Consequently, property clearance, or even eviction, is all too often the way they deal with it. My own view is that in every borough there should be cross department teams, which must include the Community Healthcare Team (or whatever they call them now). The first line of action should always be for a proper health assessment (including mental health) to be carried out, if appropriate including the person's GP. Then, if underlying physical or mental health issues are identified, appropriate treatment must be offered. Local Government organisations also need to be made aware that hoarders are often petrified of them and will not answer the phone to them, or open letters, for fear of what might happen. It is usually not that they don't want to cooperate, but they want help. Instead they often face fear and anxiety.

Property clearance should always be the absolute last recourse. Even then, local government bodies who do this must be held accountable. I have heard anecdotal accounts, which obviously I cannot confirm, of personal possessions and valuables being taken during clearances. Where clearances have to be done it must be in a controlled way, using only DBS checked staff who have been properly trained or, preferably, reputable decluttering companies who are experienced in working with vulnerable people.

User: Lendlease

We agree that estate regeneration has significant potential to deliver environmental benefits, tackle inequalities and deliver new community facilities whilst achieving an uplift in housing. Estate renewal can also add to the viability of local businesses and vitality of local community hubs. We support, in principle, the requirement to obtain the maximum viable affordable housing delivery through estate regeneration and are committed to providing a range of affordable housing tenures and fully support the approach that all tenants are offered a new, safe well designed new home that meets their need. The potential benefits of estate regeneration are substantial and multifaceted with a number of major economic and social benefits and a variety of stakeholder needs to balance and deliver. This potentially significant qualitative enhancement of old estates is an important and significant benefit, which should be taken into consideration.

Each estate is unique and has particular site constraints, many were developed at a very different time where (for example) making the most efficient use of land, tacking inequality or environmental sustainability was not a priority. With this in mind, and having consideration to the Mayor's Good Growth agenda and associated draft policies, we consider that habitable rooms is a more relevant comparison than floorspace as currently set out in the draft policy.

It is important that local decision-takers can fully assess proposals in the round and consider overall viability of bringing such schemes forward. The requirement for affordable housing to be provided on an equivalent floorspace basis could prevent regeneration coming forward in some cases, even if it was locally supported. The approach to estate regeneration should therefore be deferred to the LPAs in line with their own Borough wide housing strategies and within the reasonable parameters on maximising affordable housing and increasing housing delivery within their Borough. In this way they can consider the appropriate tenure split having regard to their own particular local circumstances.

In this regard, we are concerned that, as currently worded, Part C could have the unintended consequence of delivering homes at the low and high ends of the price range, but not in the middle where there is substantial housing need.

Our suggested change is:

"For estate regeneration schemes the existing affordable housing ***(habitable room provision)*** *~~floorspace~~ should be replaced on an equivalent basis i.e. where social rented* ***dwellings*** *~~floorspace is~~* ***are*** *lost, ~~it~~* ***they*** *should be replaced by general needs rented accommodation with rents at levels based on that which has been lost, and the delivery of additional affordable housing should be maximised.* ***Where this cannot be viably achieved or where the local Housing Strategy indicates that a different approach is appropriate under the local circumstances, alternative arrangements can be agreed with the LPA, following consultation****. All schemes should follow the Viability Tested Route (see Policy H6 Threshold approach to applications)."*

These changes ensure that the Plan is not overly prescriptive and allows for local interpretations of the policy within the strategic framework. This will allow LPA's some latitude to respond to local circumstances while being in general conformity with the London Plan as required by the GLA Act 1999.

We support the aims of estate regeneration set out in Policy 4.10.2. We would suggest that "where possible constructing net additional high quality new homes to help meet London's housing needs" should be added to this list as is compatible with and could assist in realising the three current aims.

User:	Oneill Homer

H10 Neighbourhood plans are very well suited to tackle Estate Regeneration: by providing local communities with a degree of ownership of the project; by sharing the technical evidence to provide a common platform to identify and discount reasonable options; by raising the awareness of local people of the practicalities for delivering viable development; by enabling local communities to innovate to generate options that development partners may have ignored or discounted; by providing an independent examination of the final proposals; and by requiring a referendum to validate the final outcome.

User: Highams Park Planning Group

SUB-DIVISION OF HOMES

An Article 4 Direction is in place across the whole of Waltham Forest which removes the Permitted Development rights pertaining to the creation of Homes in Multiple Occupation and policies that would apply to any such application are contained in the Waltham Forest Development Plan.

However, concerns have been expressed about the condition of some properties in the Area which have been sub-divided into more than one home - particularly about the poor quality of such development. The conversion of houses into multiple units should generally be resisted and high standards enforced. In the case of new conversions there should be restrictions covering: the number of units to be provided within an existing property; the effect on the character and appearance of the building, gardens or adjacent buildings or the streetscape; the impact on neighbouring residential properties and amenities; the provision of adequate storage space for waste and recycling bins and containers; the provision of adequate, off-street parking.

The same criteria should apply for retrospective approvals.

The Plan therefore requires that the sub-division of any existing building within the Plan Area for the provision of housing satisfies the conditions laid out in Policy HDA3 below.

POLICY HDA3: Sub-Division of Homes

Conversions of buildings to smaller self-contained homes (C3), will only be permitted where:

i. The conversion provides at least one home of at least 74sqm, suitable for 4 person occupation and with access to a dedicated rear garden area of no less than 50sq metres.
ii. All other homes within the development should have a floor area of at least 50sqm
iii. It is close to public transport, shops and services.
iv. It respects and reflects the original architecture.
v. It provides high quality doors and windows.
vi. It is well insulated from noise.
vii. It provides good refuse and storage facilities.
viii. It provides appropriate levels or safe and secure cycle parking.
ix. It provides at least one off-street parking space where two dwellings are proposed and two where three are proposed (and so forth).
x. Meets the requirements of this Neighbourhood Plan in terms of energy and water efficiency.
xi. Driveways should provide appropriate drainage and at least 50% of the front garden should be laid to grass, trees, shrubs and flowerbeds.

User: 4 Estates Forum

4 Estates Forum: summary of objection and request for the Examination in Public

The 4 Estates Forum (4EF) is made up of elected representatives of residents of One Housing Group's (OHG) 2,027 homes on 4 estates on the Isle of Dogs (St Johns; Barkantine; Samuda; and Kingsbridge). We have been active since 2016 act as an umbrella group for all residents (whether tenants, leaseholders or freeholders) on our estates.

The Forum promotes discussions, debates and negotiations with any, and all, public sector, voluntary sector or private sector entities which are already playing a part (or could, or would wish to, play a part) in the future of the Barkantine, Kingsbridge, St Johns and Samuda Estates.

The 4EF has been actively monitoring the housing targets set by Tower Hamlets and those set by GLA, based on the SHLAA work, in their London Plan and IoD&SP Opportunity Area.

In this letter the 4EF are objecting to the London Plan and request to attend the Examination in Public on following grounds:

? The London Plan's housing target for the Isle of Dogs and South Poplar Opportunity Area (OA) assumes net additional units;

? It appears a significant number of those additional units could only be built after the demolition of existing housing estates – including some of our homes.

We therefore believe that the draft London Plan as it stands contravenes planning guidance and principles in two main ways:

d) *The GLA's Strategic Land Availability Assessment (SHLAA)*: the principle that the element of a GLA housing target for an area that is assumed to come from estate 'redevelopments' should **not influence future planning decisions in individual cases**.

e) *The Mayor of London's draft Best Practice Guide to Estate Regeneration:* the guidance that **estates should only be redeveloped with residents' support**.

? As at Feb 2018 no consultation has begun regarding any proposals for the four Island Estates. Any proposals, which may include the redevelopment of our estates, are at an early stage. Results of a stock condition survey won't be published until end of February 2018. The next stage - option appraisal - will take several months, only then could consultation begin, and residents' support be assessed.

? Any London Plan's housing target that assumes net additional units based on the demolition of homes before resident consultation has even started risks unduly influencing future planning decision.

? Any London Plan's housing target that specifies additional housing on currently resident occupied land where no consultation has begun is undermining residents' confidence that a consultation process is genuinely open to options other than estate demolition. **Those London Plan's targets are therefore unreliable and do not support interests of any stakeholder: residents', OHG's, or the GLA's**.

4EF representatives would like to attend the Examination in Public to obtain specific answers to several questions concerning how the OA housing target has been arrived at.

Specifically, the GLA need to demonstrate how London Plan housing targets for the Isle of Dogs and South Poplar Opportunity Area can be delivered without demolishing any homes on our estates.

The draft London Plan's OA housing target of 29,000 net additional units is much higher than Tower Hamlets' Local Plan for new housing in this area – by some 8,000 to 20,000 units. We have reasonable concerns that the London Plan's 'extra' units target pre-empts demolition and redevelopment of our estates. We are also concerned the still unpublished OAPF includes unfounded and pre-emptive London Plan's targets.

Knowing the local planning approval process is based on local targets, but the decision can be overturned by Mayor of London based on GLA targets, we are concerned the new unit numbers are significantly misaligned between the London and TH Local Plan.

The significance of the difference between London and Local Plans is exacerbated by the ongoing delay in publication of the OAPF. The postponement of the publication of the OAPF seems to indicate the target numbers between the two plans might be viewed as contentious.

The Mayor of London's role

Any future redevelopment proposals are likely to be for more than 150 units, so would be referable to the Mayor of London for comment. If the Mayor of London supports any application in principle pre-planning, this could put undue pressure on planners and councillors in Tower Hamlets in determining any future planning application, regardless of the quality of any resident consultation. If a scheme does come forward that delivers net additional units, it is not unreasonable to believe that the Mayor of London would be minded to approve it on the grounds that the London Plan housing targets for the area already assume new units from the redevelopment of our estates.

The Isle of Dogs and South Poplar Opportunity Area Planning Framework (OAPF)

The draft London Plan was published on November 29th, 2017. Its 29,000-unit housing target for the Isle of Dogs and South Poplar (IOD&SP) Opportunity Area must be informed by the IOD&SP Opportunity Area Planning Framework (OAPF), which will include a housing target for the area.

Opportunity Areas are designated by the GLA as priority areas to deliver new housing. Their Planning Frameworks are GLA-led, ‘in consultation’ with local councils. The GLA decides the contents of OAPFs, rather than local councils.

The final version of a draft OAPF was due to be published in spring or summer 2017, long before the Draft London Plan, following a local consultation, but has been delayed by several months.

The GLA OAPF team consulted the 4 Estates Forum and others, most recently in early 2017. An early draft of the OAPF effectively assumed that an unspecified but significant number of additional housing units would come from the ‘regeneration’ of our estates. This would likely involve the demolition of at least some of our homes.

A revised housing target appeared to assume a much more modest number of new homes from ‘estate regenerations’ across the whole area. These numbers could conceivably be based on possible in-fill schemes coming forward during the plan period. However, it remains unclear how OAPF numbers are flowing to the Draft London Plan, and if the "revised" housing targets will be kept in the London Plan.

Mayor of Tower Hamlets objection to OAPF

Following the GLA consultation, John Biggs, the Mayor of Tower Hamlets, publicly stated that he was intending to object to the revised draft OAPF, on the grounds that its housing target might be thought to include many new units coming from the redevelopment of our estates. We believe that this disagreement still remains as the OAPF still hasn’t been published, and as far as we know, Tower Hamlets council is disinclined to support it.

User: 4 Estates Forum

Evidence of failure to consult or obtain resident approval and potential undue influence over the planning process

Despite the fact that no meaningful consultation process has started on our estates, the evidence suggests that GLA planners already support in principle the demolition and redevelopment of our homes.

- ? In 2015, under the previous Mayor of London, OHG lobbied to obtain provisional support for Project Stone, a plan to completely demolish all four estates, by way of consulting planning officers at the GLA and Tower Hamlets

Recently OHG's new chief executive said this proposal is "now dead" and OHG are open to exploring all options, a change residents have welcomed. But we also note that demolitions have not been ruled out, and OHG have not committed to hold a resident ballot.

- ? In March 2017, OHG bid for £6m from the GLA's Affordable Housing Programme without telling Tower Hamlets Council, residents, or Argent, their development partner. The bid assumed total demolition of the Kingsbridge Estate. Its status was an 'indicative' or 'provisional' bid for funding, that apparently would not 'prejudge' any future planning application.

Residents were sceptical, on the grounds that GLA officers would be likely to support any future planning application, as important for delivering their programme through funding already earmarked, regardless of whether its formal status was only 'indicative' or not. OHG withdrew the bid and apologised for not consulting residents. They stated that they only included the Kingsbridge Estate in their overall funding bid because GLA officers asked them to. Irrespective of who initiated this bid, the residents have legitimate cause for seeing it as lobbying for GLA support in planning terms, as well as for funding, albeit provisionally, and subject to future consultations.

Meaningful consultation – risk for pre-empting consultation results – e.g. Heygate

GLA planners will make the valid point that any future estate redevelopment proposals will be judged on several 'material considerations', including the requirement for 'meaningful' resident consultation. Although we accept this, we also point out that 'meaningful' is undefined, and under current guidance social landlords have gained planning permission against residents' will, for example at the Heygate estate in Southwark, which nobody can cite as a good practice example of achieving a sustainable community or protecting existing residents.

Changes to development plan after planning approval – e.g. Indescon Court

The 4EF is concerned that the high GLA housing targets exacerbate the known issue of developers changing their development plan after the planning application is granted.

London Plan policies, (including housing targets), takes precedence over Local Plans and other matters. Isle of Dogs residents know this from experience, because it has been demonstrated in several cases locally, including Indescon Court, where, according to Tower Hamlets council, One Housing Group and/or their development partner contravened the ‘spirit’ of a Section 106 agreement by delivering ‘affordable’ rent homes instead of social rent.

This was a complicated case with several elements, but in the end ‘affordable’ rents were allowed because the original S106 was not sufficiently clear in defining sub-market rents, despite the fact that ‘affordable’ rent didn’t exist in 2008 when the original S106 was signed by the developer. The relevant point is that Tower Hamlets officers approved the conversion, with conditions, in a difficult situation. In theory, several ‘material considerations’ were relevant to this application, but in the end one prevailed over all the others - the councils’ understandable imperative to meet their London Plan housing target by delivering new units.

In that context, we hope a planning inspector can understand that our concerns are legitimate ones that can’t be dismissed. They are also underlined by two other relevant examples of (draft) planning policies that have given residents cause for concern, at a local level, and London-wide, through the designation of (some) of our estates a ‘regeneration’ areas, as already mentioned.

User: 4 Estates Forum

Resident ballots

We also note that if resident ballots were required by law or recommended in planning guidance, residents would have less concerns about whether the planning system could be rigged, because they would be collectively empowered to take the final decision about whether their interests are protected or not, so inadequate proposals are less likely to reach the planning application stage. Residents wouldn't be the only people to benefit from that.

Since this response was written the Mayor of London has published a final version of his best practice guide to estate regeneration. This will require resident approval ballots, as a condition of GLA funding, not as a planning condition, although ballots are recommended for all schemes involving demolitions. The details about how ballots are conducted and who is eligible to vote is being consulted on. While this is a huge positive step we also note that schemes without GLA funding will not be required to have ballots, and there are several proposed exclusions. Two especially seem unjustified to us:

a) Excluding schemes of less than 150 units. The threshold is suggested because these schemes are referable to London' Mayor under planning regulations, and therefore the GLA could scrutinise them. We see this as illogical and unnecessary. The ballot requirement is a funding condition, not a planning condition, so all schemes getting GLA grant regardless of size should require ballots. Also, it not necessary for the GLA to scrutinise small schemes which aren't referred to the Mayor. Local authorities, landlords, and residents could do that, along with the independent organisation recommended to run elections.

b) Schemes delivering important social infrastructure (undefined) could be exempt. This could include anything from a primary school to a community centre, not just major transport infrastructure projects subject to Parliamentary bills and some democratic scrutiny. Therefore, it is open to landlords and developer partners to argue that a ballot should not apply to their scheme because it delivers or enhances community heat and power schemes, community hubs etc. This is a serious loophole.

As a result, there is still no guarantee of a ballot to enable residents to protect their interests, and all our concerns about the planning process remain valid anyway.

User: Aberfeldy New Village LLP

Redevelopment of existing housing and estate regeneration (Policy H10)

We are working alongside Poplar HARCA, a housing association, on the ongoing regeneration of the Aberfeldy Estate in Tower Hamlets. From our experience we would fully agree with the Mayor that estate regeneration has significant potential to deliver environmental benefits, new community facilities and a significant uplift in housing, adding to the viability of local businesses and vitality of community spaces and facilities.

We support the aims of estate regeneration set out in Policy 4.10.2. We would suggest the following addition to the list *"where possible constructing net additional high quality new homes to help meet London's housing needs" this is compatible with and could assist in realising the three current aims. It is also compatible with the Mayor's wider spatial vision.*

The potential benefits of estate regeneration are substantial and varied. New development will be high quality, providing improved insulation, along with new community facilities and amenity spaces. It can deliver important socioeconomic improvement and qualitative improvements to the environment. Each housing estate is different and any redevelopment whether partial or complete will face a unique set of challenges.

It is important that local decision-takers can fully assess proposals in the round and consider overall viability of bringing such schemes forward. We support, in principle, the requirement to obtain the maximum viable affordable housing delivery through estate regeneration and are committed to providing a range of affordable housing tenures. However, we consider that the number of dwellings is a more relevant comparison than floorspace. The requirement for re-provision of floorspace of the same tenure may not be viable and so could prevent regeneration coming forward in some cases, even if it was locally supported. It is important that a holistic approach is taken considering in full the wide ranging benefits that estate regeneration can provide.

The approach to estate regeneration should therefore be deferred to the LPAs in line with their own Borough wide housing strategies and within the reasonable parameters on maximising affordable housing and increasing housing delivery within their Borough. In this way they can consider the appropriate tenure split having regard to their own particular local circumstances. It is important that the policy guarded against unintended consequences. It should not prevent the redevelopment of estates where this could lead to significant improvements in the quality of homes, improved facilities and net additional homes.

We support the aims of estate regeneration set out in Policy 4.10.2. We would suggest the following addition to the list *"where possible constructing net additional high quality new homes to help meet London's housing needs" this is compatible with and could assist in realising the three current aims. It is also compatible with the Mayor's wider spatial vision.*

We would suggest that the text for Part C is amended as follows:

"For estate regeneration schemes the existing affordable housing ***dwellings*** *~~floorspace~~ should be replaced on an equivalent basis i.e. where social rented* ***dwellings*** *~~floorspace~~ is* ***are*** *lost, it* ***they*** *should be replaced by general needs rented accommodation with rents at levels based on that which has been lost, and the delivery of additional affordable housing should be maximised.* ***Where this cannot be viably achieved or where the local Housing Strategy indicates that a different approach is appropriate under the local circumstances, alternative arrangements can be agreed with the LPA, following consultation.*** *All schemes should follow the Viability Tested Route (see Policy H6 Threshold approach to applications)."*

These changes provide room for local interpretations of the policy within the strategic framework. This will allow LPA's sufficient scope to local circumstances while being in general conformity with the London Plan as required by the GLA Act 1999.

User: Elephant Amenity Network

Policy H10 – redevelopment of existing housing and estate regeneration

9.1 Proposed alternative policy text to H10B ‘Where loss of existing affordable housing is proposed, it should not be permitted unless it is replaced by equivalent or better-quality accommodation, providing at least the equivalent level of affordable housing floorspace, flat sizes, density and tenure. Rental and service charge costs should be as existing. and generally should produce an uplift in affordable housing provision. Where additional homes are delivered this should comprise 65% affordable homes (50% social rented and 15% intermediate). Refurbishment options, to demolition. should always be considered.

9.2 Proposed additions / alterations to (c) For estate regeneration schemes the existing affordable housing floorspace should be replaced at least on an equivalent basis (including floor space, flat size and density). Any replacement social housing should be of the same tenure, rents and service charges as existing. Where additional homes are delivered this should comprise 65% affordable homes (50% social rented and 15% intermediate). Refurbishment rather than demolition should always be considered. A thorough comparative analysis of social, economic and environmental costs and benefits should always be carried out.

9.3 We propose addition of the following – ‘In all instances involving loss of social rented homes through estate regeneration (whole estate or sections of estates), should only go ahead where agreed by the majority of tenants, determined via a ballot.’

User: Urbanissta

Policy H10 Redevelopment of Existing Housing and Estate Regeneration

Policy H10 sets out that loss of existing housing is acceptable provided that they are replaced by better quality and high density housing.

Comment: This Policy requires a threshold approach even for estate regeneration schemes which are replaced on an equivalent basis (where rented floorspace is lost). This again will slow down development.

User: London Borough of Camden

The Council generally supports Policy H10, but proposes some amendments in relation to detailed aspects of the policy and supporting text.

As stated in our comments on Policy H5, the Council considers that Policies H5 and H10 (or their supporting paragraphs) should be amended to clarify the relationship between them, and should state that estate regeneration schemes will be assessed on the basis of Policy H10. When considering individual estate regeneration schemes or larger regeneration programmes on public land, it will rarely be possible to deliver the 50% of affordable housing target envisaged by Policy H5 Criterion A(4).

Criterion A - As noted in the Council's comments on Policy H2 Small sites, the Council welcomes the encouragement included in supporting paragraph 4.2.11 for boroughs to resist the amalgamation of flats where this is causing the sustained loss of homes. However, Policy H10 Criterion A and paragraph 4.10.1 directly address the loss of housing, therefore the Council considers that encouragement for measures to resist amalgamation should be included or cross-referenced here.

Criterion C – this indicates that where social rented floorspace is lost, it should be replaced by general needs rented accommodation with rents at levels based on that which has been lost. The Council considers that Criterion C and supporting paragraphs should provide flexibility for replacement social homes to be let at target social rent levels.

Rent levels on Camden Council estates are currently below target rent levels in many cases. Where estate regeneration takes place, replacement homes provided through Camden's Community Investment Programme (CIP) will be higher quality, more energy efficient, and in many cases larger. To make estate regeneration viable, it will be necessary to charge target social rents for replacement homes. These rents are 'based on' the rents of the housing that has been replaced, but they may be a little higher (although heating costs will be lower in the replacement homes).

User:	London Borough of Camden
The Council suggests that the aims of estate regeneration projects included in this paragraph should include the delivery of additional homes.	

User:	The Highbury Group

Redevelopment of existing housing and estate regeneration 10. Policy H10 paragraph C wording should be tightened up and made consistent with Mayor's Guide
to Good Practice to Estate Regeneration (which had not been finalised at the time the Draft London plan was published. In particular it is confusing to refer in policy paragraph C to "..general needs housing.." when the discussion begins with "social rented". Secondly the phrase "..rents at levels based on that which has been lost .." is too vague to be of any value. In the same way as was drafted with the inclusion of a reference to the "Viability Tested Route", the reference to the Mayor's Good Practice Guide on Estate Regeneration should be brought into the Plan Policy wording and not just in the accompanying text (para 4.10.3)

User: The Highbury Group

H10 Redevelopment of existing housing and estate regeneration

Reword H10C as follows: “For estate regeneration schemes the existing affordable housing floorspace should be replaced on an equivalent basis ie where social rented floorspace is lost, it should be replaced by social rented accommodation with rents and security the same or very similar to that which has been lost, and the delivery of additional affordable housing should be maximised. All schemes should follow the Mayors Good Practice Guide to Estate Regeneration, including the use of ballots as appropriate, and the Viability Tested Route (see Policy H6 Threshold approach to applications).”

Explanatory note: This amendment would bring the policy into line with the recently published Mayor’s Good Practice Guide to Estate Regeneration

User:	Sara Chernaik
Any regeneration projects should guarantee that any residents temporarily rehoused are able to return to new, affordable homes in the area.	

User: Pat Turnbull

Policy H10 Redevelopment of existing housing and estate regeneration

4.10.1. The regeneration and intensification of London's housing areas has been, and will continue to be, a key part of the evolution of London, and critical to meeting its housing needs…**Delete this sentence. Regeneration of London's housing estates has reduced the amount of social rented housing and replaced it with large amounts of market housing that do not meet need.**

4.10.2 The aims of an estate regeneration project will typically fall into three broad categories. These are

*maintaining good quality homes

*maintaining safe and good quality homes

*improving the social, economic and physical environment in which homes are located…**Delete this point. This is entirely subjective; what often actually happens is that households on below median income are forced out and replaced with households on well above median income, or investors.**

4.10.3 In some cases, regeneration will include the loss and replacement of homes and it is important that any such scheme is delivered with existing and new **delete and new** residents in mind …take account of the requirements of the Mayor's Good Practice Guide.

4.10.4 ..all estate regeneration schemes should go through the Viability Tested Route…

User:	Balfour Beatty

Policy H10 - Redevelopment of existing housing and estate regeneration Balfour Beatty acknowledges the challenges in delivering long and complex estate regeneration schemes. These schemes must improve the quality of life for residents, whilst also contributing to wider housing provision. Proposed Policy H10 C for affordable housing to be replaced on an equivalent basis and the delivery of additional affordable housing to be maximised may pose challenges for some schemes. We urge the Mayor to consider the inclusion of an exception whereby a reduced percentage of new affordable housing is required where Estate Regeneration programmes call for substantial additional public infrastructure which requires cross-subsidy from private income. Without this, the affordable housing requirements for estate renewal schemes could prevent the delivery of infrastructure that would be funded by private sales and the introduction of private tenures that would create balanced communities. This is especially concerning as estate regeneration is often only marginally viable

Policy H11 Ensuring the best use of stock

User:	Mrs Sarah Witney

The Mayor should be pressing for legislation to

- double the rateable value of empty property

- increase the ratebale value of short term let properties

- Shortening the period planning permision lasts to enscourage quicker building

User:	Levitt Bernstein

It is not clear how this policy will work in practice. What mechanisms are envisaged to establish and monitor the number of vacant dwellings? Have any boroughs had any success in this regard?

User:	Levitt Bernstein

This approach to “Holiday Rental” is far too lenient. 90 days a year is too much but the fact that it is impossible to police effectively is an even greater problem. The effect this has on the rental sector is dangerous and can result in far less reasonably priced rents in a particular area. Lessons should be learned from cities such as Berlin and Barcelona in this regard.

User:	Trust for London

Support -

We welcome this. We have committed to support research on approaches to ‘buy to leave’ by Empty Homes, which would deliver research on good practice from around the world in the next 12 months.

User:	London Forum of Amenity and Civic Societies

Neutral -

H11 B: This needs to be strengthened beyond seeking to ensure stock is occupied.

London Forum **strongly supports** these measures to “recover” these elements of the stock which are reducing the amount of housing available to meet objectively-assessed need – vacant dwellings and “buy-to-leave”, especially newly-completed stock, which never enters full-time occupation, and holiday rentals which diminish the stock.

User: London Assembly Green Party Group

Object -

I very much welcome this policy, in particular H11 B which allow boroughs with identified problems with ‘buy to leave’ properties “to put in place mechanisms which seek to ensure stock is occupied.”

In Towards a new London Plan, I made the proposal below and I am glad the Mayor has attempted to support these kinds of conditions in the draft new London Plan.

Policy H11 could be made stronger by specifying that one possible mechanism is lease conditions being required as part of planning agreements.

Prohibit ‘buy-to-leave’ for new builds

"On the growing tendency for second homes and ‘buy to leave’ purchases in new developments, the new London Plan should require developers to apply lease conditions to the homes they build which make sure these are the primary residence of the new owners.

"The need for new housing for Londoners is the basis of housing targets, and homes that are not lived in or used only infrequently do not contribute towards these goals, so a condition that newly-built homes should be lived in is justifiable. Those wishing to buy a second home in London will not be prohibited from buying older stock under this planning policy, but it will help to prevent waste in new housing supply from pure speculation."

Towards a new London Plan

User:	Mrs Jayne Huntley

How many houses have been purchased in elite parts of London by overseas investors or Companies and remain empty? This is unjust and should be tackled by those in power to utilise for proper community housing.

User:	Putney Society
Policy H11 – Ensuring the best use of stock This policy should include a requirement for developments to be marketed locally first.	

User: Home Builders Federation

The policy is unsound because it is ineffective.

It is unclear what would constitute a home bought as ‘buy to leave’. It is unclear how long a dwelling would need to be left empty before it qualified as something that had been purchased with the intention of being left unoccupied. Nor is the policy clear about what actions the boroughs could lawfully take to confiscate such homes or put tenants into them. The policy is woolly and consequently ineffective.

Evidence of dwellings deliberately bought but left unoccupied shows that this is a very small problem. The research produced for the GLA in 2017 by the LSE and the University of York suggests that in 2014 and 2015 less than 1% of the stock bought by overseas investors might feasibly be construed as being deliberately left empty. Most homes bought in London by investors, including those from overseas, are rented out.

User:	Annington Homes

Policy H11 – Annington Homes are supportive of measures by the GLA and Boroughs to use all the tools available to reduce the number of vacant dwellings in London. This is particularly so on public land to deliver the Plans outcomes.

User:	Royal Borough of Kensington and Chelsea

4.10 Policy H11 Ensuring the best use of stock

The Council considers that this policy could go a lot further on controlling the number of "buy to leave" properties which is an issue common to all central London boroughs.

Instead it does not offer any new guidance/policy but only encourages boroughs to use all the tools at their disposal such as Empty Dwelling Management Orders to bring long-term vacant stock back into use as affordable housing. This does not go far enough in offering a strategic lead on this important issue.

User: London Borough of Islington

Draft London Plan Policy

Policy H11 – Ensuring the best use of stock

Islington Response

The Council supports the scope of policy H11, although the policy itself is no more than a broad statement of support for various policy approaches. Islington have an adopted SPD which aims to limit the ‘buy-to-leave’ phenomenon, and we would welcome further discussions on how this approach can be more definitively incorporated into the London Plan.

London boroughs have no meaningful ability to limit the impact of short-term lettings due to the changes in the Deregulation Act. We would support reinstatement of the previous restrictive provisions, and the Mayor could use his lobbying role to advocate for this with Government.

We note that Part C of the policy is potentially at odds with policy E10(F) which is seemingly more supportive of short term lettings. We would support a restrictive approach to limit any impacts on housing stock.

User: London Borough of Islington

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We note that Part C of the policy is potentially at odds with policy E10(F) which is seemingly more supportive of short term lettings. We would support a restrictive approach to limit any impacts on housing stock.

User:	Battersea Society Planning Comittee

We endorse the proposals set out in the following and trust that action will be taken without delay.

User:	Kew Society
We support efforts to ensure that housing stock is occupied.	

User:	Association of Consultancy & Engineering

Part of London making the best use of its housing stock is about ensuring homes are occupied by the most appropriate people. Whilst the policy has some solid recommendations relating to the best use of empty dwellings, there is no provision within the policy for encouraging people into homes that are appropriate for their needs. The Mayor must consider ways to encourage Londoners to move into more appropriate sized homes, and they must be extensively supported in doing so. For many older people, living in a home larger than they need can be problematic, and maintaining the property is especially difficult. However, adequate provision must be made by the Mayor to ensure people are not simply transplanted out of their social and local networks in order to free up homes for other people, as this risks creating fractured communities.

User:	Galliard Homes

Galliard objects to Policy H11 – Ensuring the best use of stock, and it should be removed - particularly part B. The implication of `putting in place mechanisms which seek to ensure housing stock is occupied', goes well outside the planning remit, especially where it relates to planning permissions. Who enforces this? How is that assessed? And, against what criteria?

User: London Assembly Labour Group

Suggested Changes

To include the wording after A (1) Boroughs should promote efficient use of existing stock by using all the tools available to reduce under-occupation of homes and encourage down- sizing in all tenures.

Justification for recommendations

This plan should encourage the best use of the stock London has. We know that a great many family sized homes are under-occupied, not only in the market but also in affordable tenures.

We would want the Plan to both encourage and help Boroughs to assess their stock in this way to help tackle over-crowding.

User:	Airbnb
See attached	

User:	London Waste and Recycling Board (LWARB)

1. We support policy H11 – Ensuring the best use of stock. Optimising use of buildings and space will help to increase housing supply, and support the principles of Good Growth and the circular economy.

User: Newham Union of Tenants

Policy H11 – Ensuring the best use of stock

1. Given high levels of needs for new homes it is essential to take good care of existing homes. This policy needs to be far stronger in respect of requiring good management and maintenance of existing stock of all tenures.
2. The policy for example could require that in any estate regeneration scheme that there is a full fire statement / independent fire strategy is required (as D11B)
3. Section C should mention of Airbnb, as this is a significant problem in some areas.
4. We propose that there should be a requirement for all new housing to last for at least 150 years and for good quality management and maintenance plans to be put in place in order that we plan for longevity of our housing stock.

User:	London Borough of Lambeth

What support can the GLA provide to boroughs in identifying evidence on buy-to-leave? There are limited sources of data available to boroughs about this phenomenon. Please could the Mayor also continue to lobby central government on the mechanisms needed by local government to tackle this issue.

Lambeth welcomes the efforts to date by the GLA to engage with on-line holiday letting portals and encourage them to self-police the 90 days-a-year rule. It would be extremely helpful to the boroughs if the GLA could maintain this engagement and monitor the position London-wide, as the boroughs have very limited resources for this activity and the portals operate at a wider-than-borough level.

User: London Tenants Federation

4.11.1 Policy H11 – Ensuring the best use of stock

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4.11.2 The policy for example could require that in any estate regeneration scheme that there is a full fire statement / independent fire strategy is required (as D11B)

4.11.3 Section C should mention of Airbnb, as this is a significant problem in some areas.

4.11.4 We propose that there should be a requirement for all new housing to last for at least 150 years and for good quality management and maintenance plans to be put in place in order that we plan for longevity of our housing stock.

User:	London Borough of Merton

Support In contrast to a number of the other policies which are overly prescriptive, this policy largely reads more as statements of intent rather than policy setting out clear requirements.

User:	London Borough of Haringey
The Council supports this policy	

User: RICS

More homes and better use of stock

London doesn’t just need more homes, but it needs the right type of homes that are suitable for its population. Although we agree with **Policy H11** (ensuring the best use of stock) that would provide London Boroughs powers to penalise ‘buy to leave’, this plays a relatively small role in the market.

User:	London Borough of Barking & Dagenham

The Council supports the Mayor’s concern around buy to leave properties even if this phenomenon hasn’t reached Barking and Dagenham. However rather than rely on boroughs to tackle this issue the London Plan should make clear this will not be tolerated.

User:	London Borough of Brent
Supported as will reduce pressure to provide additional homes for London, but not really a significant Brent issue currently.	

User:	Save Swiss Cottage

Policy H11 – Ensuring the best use of stock
11.1 Given high levels of needs for new homes it is essential to take good care of existing homes. This policy needs to be far stronger in respect of requiring good management and maintenance of existing stock of all tenures.
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11.3 Section C should mention of Airbnb, as this is a significant problem in some areas.
11.4 We propose that there should be a requirement for all new housing to last for at least 150 years and for good quality management and maintenance plans to be put in place in order that we plan for longevity of our housing stock.

User:	London Borough of Bromley
The Council notes the policy and is itself exploring potential for conversion of vacant properties for use as temporary or settled provision.	

User:	London Borough of Hounslow

Policy H11 should provide greater emphasis on planning for size mixes reflecting identified local need, and in terms of HMOs, take account of the challenge and potential problems caused by this type of housing, especially in suburban environments.

User:	London Councils

London Councils is supportive of this policy and agree that the number of vacant dwellings in London should be reduced where possible. Boroughs are already using all the tools at their disposal such as increased rates of council tax, grant and loan schemes, all the way through to Empty Dwelling Management Orders where appropriate to bring empty homes back in into use and will continue to do so. The GLA recent research into overseas investors in London's new build housing market estimated that the propensity to leave homes empty or under-used in some way is greater among properties of higher values, in small prime areas of London. The GLA, and boroughs that contain areas of high value property, can work together to alleviate issues to do with overseas investors leaving properties empty.

London Councils agrees that the use of dwellings as short-term holiday rentals can have a detrimental impact on the supply of homes. The GLA can work with boroughs and the providers of short-term holiday lets online platforms (such as Airbnb) to ensure that users are properly policed and not letting homes for more than 90 days.

User: London Borough of Tower Hamlets

We support the objectives of this policy and are glad that this issue has been acknowledged in the London Plan.

However, we do consider there to be a strategic role in addressing this issue, in particular in relation to actions which could be taken outside of the planning system.

We are aware that the Housing Strategy has a number of work streams which relate to this and these could usefully be referred to in the supporting text.

User:	Royal Borough of Kingston
Support.	

User:	London Borough of Waltham Forest

We agree that existing housing stock should be used efficiently, including reducing the number of empty dwellings. However, the policy does not set out the tools which boroughs should be using to assist in this endeavour. We would welcome further guidance from the Mayor and GLA on the delivery of this policy

User: HFFTRA

Policy H11 – Ensuring the best use of stock

11.1 Given high levels of needs for new homes it is essential to take good care of existing homes. This policy needs to be far stronger in respect of requiring good management and maintenance of existing stock of all tenures.

11.2 The policy for example could require that in any estate regeneration scheme that there is a full fire statement / independent fire strategy is required (as D11B)

11.3 Section C should mention of Airbnb, as this is a significant problem in some areas.

11.4 We propose that there should be a requirement for all new housing to last for at least 150 years and for good quality management and maintenance plans to be put in place in order that we plan for longevity of our housing stock.

User:	London Borough of Hackney

Hackney support the intent of the policy although further guidance on how this can be achieved through the planning system would be useful.

User: Westminster City Council

We are dismayed that the Mayor has failed to take this opportunity to make a clear statement opposing the loss of mainstream housing stock to nightly letting. This is a genuinely strategic issue for Greater London which is having a significant impact in Westminster and other boroughs. We would strongly urge that the strong view on this issue taken in both previous London Plans should be carried forward in the DRLP, with policy supporting boroughs taking action to address the negative impacts nightly letting can cause to availability of housing, and amenity, including in making the case for exemptions to central government. The absence of any commitment to lobbying government to address enforcement issues surrounding nightly letting is also concerning.

Conversely, there is little the planning system can do to tackle empty homes – as boroughs who have sought to introduce such policies in London have found. Enforcement of such policies is extremely difficult and they involve a degree of intrusion into private matters that planning inspectors have proved unwilling to countenance.

User:	London Borough of Redbridge

We broadly support policy H11. Redbridge has no significant issues currently within its council housing stock in terms of long term voids and is proactive in trying to bring empty homes back into use. A reliance on measures such as Empty Dwelling Management Orders as an effective method to produce any significant impact on empty properties however does not recognise the reality that they are only a suitable option in a very small number of cases and are often not financially viable options for the authority.

User:	London Borough of Wandsworth

Whilst welcoming this principle of reducing the levels of empty homes, the Council would like to see clarification that older residents who may temporarily leave their homes, to assess residential or other types of accommodation offers, are not penalised by this approach.

User:	London Borough of Richmond Upon Thames

Whilst welcoming this principle of reducing the levels of empty homes, the Council would like to see clarification that older residents who may temporarily leave their homes, to assess residential or other types of accommodation offers, are not penalised by this approach.

User:	London Borough of Harrow
The Council support this policy.	

User:	Royal Borough of Greenwich

H11C

Whilst RBG agree that holiday rentals can have a significant impact on the supply of homes, it is difficult to see how this policy would work in practice. Local authorities would not have the means to gather or monitor information on the number of holiday homes in the borough and particularly how many days they are used per year. Furthermore, local authorities would not have the power or resources to enforce such a policy.

User:	Marble Arch Partnership

We are concerned that the Plan should take a stronger approach to tackling short term lets. We have a huge number of short term lets that have taken over permanent residential flats within the large mansion blocks in our area. These are not a new problem but are being fuelled by London's booming gig economy. While they contribute to demand for restaurants and late night entertainment, they can have a devastating effect on communities where they become intensified and outstrip regular residential uses. They can also harbour organised crime, such as vice and trafficking. The plan should have a clear policy preventing the use of residential premises as short term lets. The Plan might usefully have a policy that promotes the development of properly designed short term lets in appropriate locations.

User: London Young Labour

Empty Homes

While we recognise that bringing long term vacant properties into use can only make up part of any strategy to solve London's housing crisis, we believe having tens of thousands of homes sit empty – many in luxury private developments – while so many people are homeless or in inadequate housing is unacceptable. We therefore strongly support the provisions of Policy H11, particularly the provisions in 4.11.1 to encourage local councils to use Empty Dwelling Management Orders to make better use of housing stock.

We note, however, that the actual use and enforcement of Empty Dwelling Management Orders by councils has been relatively low since its introduction in 2006, and would support City Hall investigating how it can encourage and support local authorities to use their powers more effectively. Accordingly, we strongly support the provisions of H11B: 'The Mayor will support boroughs with identified issues of homes being left empty as 'buy to leave' properties to put in place mechanisms which seek to ensure stock is occupied'. We believe City Hall has a valuable strategic role to play across councils to reduce the number of empty homes.

User: Just Space

Policy H11 Ensuring the best use of stock

This is welcome but should be stronger.

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

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

User:	Rosalind Readhead

Under occupation of dwellings shows where densification is possible. Car Parks and car infrastructure like garages must be the first to be developed for housing.

https://www.theguardian.com/money/2013/apr/18/half-privately-owned-homes-under-occupied

https://www.london.gov.uk/sites/default/files/housing_in_london_2015_v3.pdf

User: London NHS Clinical Commissioning Group

Policy H11 Ensuring the best use of stock

We support the Mayor's commitment in clause B of the policy to support boroughs with identified issues of homes being left empty as 'buy to leave' properties by putting in place mechanisms which seek to ensure stock is occupied. The issue of under-occupation of new homes makes it difficult to plan for future service and estate needs and increases the risk of over-providing infrastructure.

User:	Kingston and Surbiton Constituency Labour Party

We welcome the greater use of EDMOs and control of short-term lets (4.11.1) also support for specialist accommodation (Policy H14) and attempts to reduce the speculative building of student accommodation (H17).

User: London Federation of Housing Cooperatives

Policy H11 – Ensuring the best use of stock

11.1 Given high levels of needs for new homes it is essential to take good care of existing homes. This policy needs to be far stronger in respect of requiring good management and maintenance of existing stock of all tenures.

11.2 The policy for example could require that in any estate regeneration scheme that there is a full fire statement / independent fire strategy is required (as 11B)

3. Section C should mention of Airbnb, as this is a significant problem in some areas.

11.4 We propose that there should be a requirement for all new housing to last for at least 150 years and for good quality management and maintenance plans to be put in place in order that we plan for longevity of our housing stock.

User:	Chartered Institute of Architectural Technologists

Policies H6, H7, H8, H9, H10, H11, H12, H13, H14, H15, H16, H17 & H18

We are in agreement with the proposals contained in the plan.

User: British Property Federation

We think the policy wording in H11c could be stronger. Currently it reads:

Boroughs should take account of the impact on the housing stock of applications for homes to be used as holiday rentals for more than 90 days a year.

We would advocate a stronger policy that is along the lines of:

Where it is demonstrable that there will be no significant impact on housing supply, Boroughs should take a considered approach to approving planning applications for homes to be used as short term/holiday rentals for more than 90 days a year.

User: Apex Airspace Development

We welcome the proposition that local authorities should do everything in their powers to reintegrate vacant properties and put them back into working use. Our proposition in targeting freeholders that lack the immediate capital to undertake these works is to help them use their assets in a worthwhile way to unlock value and put their properties back on the market.

We are disappointed that the London Plan does not include in this chapter a proactive look at the potential that using existing stock that could increase the volume of housing through Airspace developments. Given that their potential changes to the planning policy will increase the ability of a freeholder to explore the possibility of upwar extensions we feel that this is an opportunity missed.

User: Benhill Residents

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We propose that there should be a requirement for all new housing to last for at least 150 years and for good quality management and maintenance plans to be put in place in order that we plan for longevity of our housing stock.

User: Elaine Chambers

Policy H11 – Ensuring the best use of stock

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User: Earls Court Public Sector Tenants' Assoc

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User:	London Borough of Newham

Policy H11 Ensuring the best use of housing stock

Although LBN are broadly in support of the draft H11, much of the policy is outside of its role as a local planning authority. In relation to Mayoral support over ‘buy to leave’ it is noted that neither the policy nor accompanying text provides detail on how this would be demonstrated

User:	London Borough of Sutton

SUPPORT. The London Borough of Sutton supports Policy H11 and the aim of making the best use of existing housing stock.

User:	London Borough of Ealing

The Council supports this policy, in particular, the new provisions about ‘buy to leave’ and short-term holiday rentals.

User:	Wokingham Borough Council

WBC supports the inclusion of a specific policy (H11) relating to minimising incidences of vacant properties, such as those which have been ‘bought to leave’. WBC considers however that this policy, and supporting text, could more explicitly refer to investment properties, such as by international investors, which are acquired purely for their money generating potential and are left unoccupied.

User:	Hornsey & Wood Green Labour Party

We strongly support taking all possible measures to take empty and ‘buy to leave’ properties back into use, and that Boroughs should take all measures at their disposal, including Empty Dwelling Management Orders, to bring vacant stock back into use as affordable housing.

User: Mr Gary Hayes

Policy H11 – Ensuring the best use of stock

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User:	Sir Simon Hughes

Key worker housing should comprise at least 10% of all affordable housing and for sale housing offered to London residents first.

User: Andrea Carey Fuller

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The policy for example could require that in any estate regeneration scheme that there is a full fire statement / independent fire strategy is required (as D11B)

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We propose that there should be a requirement for all new housing to last for at least 150 years and for good quality management and maintenance plans to be put in place in order that we plan for longevity of our housing stock.

User:	Mrs P Matthews

I think that houses that are bought and left empty often by people who are not even living here, should be sold on by the council, if the owner doesn’t agree to do so and the owner then reimbursed when sold.

User: Elephant Amenity Network

Policy H11 – Ensuring the best use of stock

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User: Urbanissta

Policy H11 Ensuring the Best Use of Stock

Policy H11 enables councils to promote efficient use of existing stock by equipping them with mechanisms to ensure stock is occupied.

Comment: This policy will need refining. It is not clear on how long property should be left vacant before it is considered as 'buy to leave'. The policy also needs to be clear on the steps that will be taken to ensure best use of stock.

User: London Borough of Camden

The Council generally supports Policy H11, but considers that the London Plan should take a more active stance to ensure homes are available to long-term residents, and that Policy H11 should indicate that the Mayor's support for boroughs in resisting use of homes as holiday rentals for more than 90 days per calendar year.

The Camden Local Plan 2017 indicates that the Council will seek to use planning obligations ensure that new homes for sale are marketed and available to buy in London for at least two months before they are marketed more widely. The Council suggests that the London Plan could helpfully provide explicit support for this measure.

User:	Karl Brown
4.11.2 For the avoidance of doubt I would suggest a change of wording to: “Homes should not be used as short-term holiday rented accommodation for an aggregate ~~a cumulative~~ period of more than 90 days in any one year period without seeking planning permission”	

Policy H12 Housing size mix

User:	Peabody
We welcome the flexibility to bring forward a range of different sized units.	

User:	Thames Valley Housing Association

Policy H12 ‘Housing size mix’ is supported by TVHA. Securing the correct size and mix of housing is key to the success of developments, as such the comments set out in paragraphs 4.12.3, 4.12.4 and 4.12.5 on family units, one and two bed units and one bed units is generally supported.

User:	Hornsey & Wood Green Labour Party

A We agree with most of the proposals, in particular the requirement to deliver mixed and inclusive neighbourhoods, and the use of new development to reduce pressure on conversion and sub-division of existing stock. However the implication in 9 (the role of one and 2 bed units to free up family housing) that older residents will wish to downsize, is problematic and should not be regarded as a reliable indicator when assessing the unit mix of a new build development.

User: Councillor for Coulsden East Ward, LB Croydon

The removal of targets for family homes.

The New London Plan fails to make sufficient provision for new family homes of three and four bedrooms. This is especially concerning in the context of the removal of the 36% family homes target from the draft Housing Strategy. This will result in there being no policy to encourage family homes.

It is vitally important that there is a target for family homes, otherwise developers will be tempted to predominantly build smaller units that are cheaper and do not provide for communities of tomorrow.

The SHMA methodology should be reviewed in order to ensure that the correct quantities of family housing are being provided. Furthermore, policies that promote two bedroom units as family housing and the use of space standards as a maximum should be resisted, otherwise there will be a dramatic reduction in the production of family homes which will ultimately lead to poor living conditions for future families.

User: Mr Gary Hayes

Policy H12 – Housing size mix

12.1 The SHMA incredibly assesses that the need for one-bedroom homes has more than doubled since 2013 (from 16,381 to 36,335). This is based on an assumption of zero under-occupation in all but owner-occupied homes, which we feel is incorrect.

12.2 A formal evaluation of the bedroom tax carried out for the DWP, published in Dec 2015 found that “not more than 8% of those affected” had downsized to smaller properties. There was some evidence that larger homes had been re-let, and there had been a “small increase” in the numbers of overcrowded tenants rehoused. Landlords were apparently reporting that there was an insufficient supply of new properties for downsizers to move to.

12.3 However, Policy in Practice http://policyinpractice.co.uk/housing-benefit-reformsimpact-tenants-towns-cities-london-boroughs-update/ says that a significant share of tenants impacted by the bedroom tax have chosen to remain in their homes and top up the rent instead – therefore not freeing up family sized homes.

12.4 We are also concerned that building so many homes for single people or couples is not reasonable. Older people may need separate rooms and / or space for someone caring for them at some stage. Most single people do, later, have children.

12.5 We are generally concerned that the targets will fail to deliver mixed and balanced communities – particularly in new large-scale development areas.

12.6 We are also concerned that delivery of such high levels of particularly one-bedroom homes is environmentally unsound – families and people sharing produce less C02 emissions and use less water per person.

12.7 We feel that following a reassessment of need for family sized dwellings that a strategic target for delivery should be set.

User:	Mr Ian Leonard
the removal of targets for family homes – in Croydon all of the planned Brick by Brick new homes appear to be one or two bedrooms	

User:	Redrow Homes London Division.

The recognition that new development and the delivery in particular of one and two bed homes assists with this is welcomed.

The Plan should cross-refer to these principles in Policy H13 Build to Rent and Policy H18 Large-scale purpose-built shared living. These are fundamental aspects of the wider public benefits that such developments will provide

User:	Redrow Homes London Division.
‘’applicants and decision-makers should have regard to… the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in more central or urban locations’ This is welcomed but it is crucial that the London Plan provides a definition of ‘central’ and ‘urban’.	

User:	Redrow Homes London Division.
‘Boroughs should not set prescriptive dwelling size mix requirements (in terms of number of bedrooms) for market and intermediate homes.’ This is welcomed.	

User: Redrow Homes London Division.

It is encouraging to see that the Mayor recognises that onebedroom units play a very important role in meeting housing need. However, this paragraph appears to omit any recognition of the demand for “smaller” or “shared Living” units which are smaller than the minimum space standards contained with Table 3.1. These units are attractive to professionals and key workers that want to be independent but cannot afford to rent a larger one-bed flat (37 to 50 sqm). Whilst these selfcontained units are smaller than the normal rental market unit, they also tend to benefit from a reduced rental level (because of the size of the units) and benefit from shared facilities such as workspace, gym, community space and amenity space.

We respectfully request that this type of product (and the demand for it) is acknowledged in this section of the New Draft London Plan.

User: Sean Creighton

The statement in Para 4.12.3 that ‘as many families do live in two bedroom units this should be taken into account when assessing the needs that different sized units can meet (in terms of bedrooms) and the design and approach to management of a development both for market and affordable housing’ is flawed.

A family of two adults and two children in a two bedroom unit, even if built to the now suggested minimum space standards, is crammed and does not allow for separate bedrooms for the children as they grow up or develop health problems, and ensure a quiet area for homework. If the homes are in blocks there may be inadequate provision of garden/amenity space in which children can play safely.

User: Sean Creighton

The recognition in para 4.12.7 that the quality of Houses in multiple occupation (HMOs) gives rise to concern is welcome, it is very disappointing that there is no robust set of policies to ensure action to improve the quality, to improve the role of Councils to increase their role to achieve either quality improvements or to compulsory purchase them and pass them to a social housing or community led housing provider. Poor quality fuels homelessness and the need for more social housing. If a tenant is helped because of the latter all it does is create a vacancy for a new letting and further demand on the Council.

User: Andrea Carey Fuller

The SHMA incredibly assesses that the need for one-bedroom homes has more than doubled since 2013 (from 16,381 to 36,335). This is based on an assumption of zero under-occupation in all but owner-occupied homes, which we feel is incorrect.

A formal evaluation of the bedroom tax carried out for the DWP, published in Dec 2015 found that “not more than 8% of those affected” had downsized to smaller properties. There was some evidence that larger homes had been re-let, and there had been a “small increase” in the numbers of overcrowded tenants rehoused. Landlords were apparently reporting that there was an insufficient supply of new properties for downsizers to move to.

However, Policy in Practice http://policyinpractice.co.uk/housing-benefit-reforms-impact-tenants-towns-cities-london-boroughs-update/ says that a significant share of tenants impacted by the bedroom tax have chosen to remain in their homes and top up the rent instead – therefore not freeing up family sized homes.

We are also concerned that building so many homes for single people or couples is not reasonable. Older people may need separate rooms and / or space for someone caring for them at some stage. Most single people do, later, have children.

We are generally concerned that the targets will fail to deliver mixed and balanced communities – particularly in new large-scale development areas.

We are also concerned that delivery of such high levels of particularly one-bedroom homes is environmentally unsound – families and people sharing produce less C02 emissions and use less water per person.

We feel that following a reassessment of need for family sized dwellings that a strategic target for delivery should be set.

User:	Lendlease

We fully support the Mayor’s proposed policy in relation to housing mix. The location of a site, particularly within central and urban locations and specific site constraints means that in some cases one and two-bedroom home are more suitable. Whilst we support family homes in the right locations, having such a flexible policy will allow the most suitable homes to be delivered where there is need. This approach too can free up family housing from elsewhere in the Borough and can help to optimise the potential of number of homes.

User: Unknown

Our client supports the wording in 4.12.2 that “Boroughs should not set policies or guidance that require set proportions of different-sized (in terms of number of bedrooms) market or intermediate units to be delivered”, and the reasons why this is the case.

However, 4.12.5 then contradicts this by stipulating that “while one-bedroom units play a very important role in meeting housing need, and provision in new developments can help reduce the pressure to convert and subdivide existing larger homes, one-person and one-bed units are the least flexible unit type. Thus, unless supported by the borough as meeting an identified need, schemes consisting of over 10 units which mainly comprise of one-person/one-bed units should be avoided to ensure that there is a mix of unit sizes.”

Our client considers that if the Mayor is dissuading Boroughs from having unit mix-based policies, he should not be then being stipulating his own. This should certainly not apply to BtR.

Two bed units should be regarded as family housing and our client support this. Two bedroom units provide a real family need in urban areas for both market and affordable housing. Our client supports paragraph 4.12.4 of the London Plan which acknowledges that “well-designed one- and two- bedroom units in suitable locations can also attract those wanting to downsize from their existing homes, and this ability to free up existing family stock should be considered when assessing the unit mix of a new build development”. Our client has first-hand experience of families moving into two bedroom units in order to downsize from larger family homes. Policies which consider 3+ bed units are solely family units are out of date with current demand.

User: L&Q

Reducing housing pressure and freeing up family housing

The recognition that new development and the delivery in particular of one and two bed homes assists with this is welcomed.

The Plan should cross-refer to these principles in Policy H13 Build to Rent and Policy H18 Large-scale purpose-built shared living. These are fundamental aspects of the wider public benefits that such developments will provide.

User:	L&Q

Homes at more central or urban locations

‘’applicants and decisionmakers should have regard to… the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in more central or urban locations’

This is welcomed but it is crucial that the London Plan provides a definition of ‘central’ and ‘urban’.

User:	L&Q

Mix of market and affordable homes

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

This is welcomed.

User: National Custom and Self Build Association

Policy H12 Housing size mix

A) To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, applicants and decision-makers should have regard to:
10) the potential for custom-build and community-led housing schemes.

NaCSBA supports Policy H12 and the requirement for applicants and decision makers to have regard to the potential for custom-build and community-led housing schemes. NaCSBA proposes that this be extended to include self build.

The potential for custom and self build is further set out in Appendix 2.

NaCSBA proposes that The New London plan makes reference to using a number of different sources to provide an evidence base for plan making and site allocation, including demand modelling.

User:	Local London Partnership

We object to and disagree with the assertion in para 4.12.3 that because families live in two bedroom units that should be taken into account in assessing the unit size (in terms of bedrooms) of developments and how it meets needs (both in market and affordable rent developments). Observing where families may have to live, most likely on cost grounds, is not the same as understanding their needs. This approach is likely to lead to an increase in overcrowded household and is not in accord with Policy GG 3A. Policy H12 A9 should be deleted in favour of relying on Policy H12 A1 and not increasing the inequality faced by Londoners wanting access to suitable homes.

User:	Local London Partnership

In order that boroughs can meet need for an appropriate mix of housing units set out in H12 A1 there must be the option for boroughs to be able to prescribe a dwelling size mix for market and intermediate homes and therefore Policy H12 C should be deleted. To leave this Policy in the Plan will mean that boroughs will have to achieve an appropriate dwelling mix through Policies only affecting a proportion of the housing supply. The outcome is likely to be an under-provision of large family units with the adverse impacts on Policy GG 3A outlined above.

User: dp9

Policy H12 – Housing size mix

We support part C of the policy, which states that boroughs should not set prescriptive dwelling size mix requirements for market and intermediate homes.

User: Elephant Amenity Network

Policy H12 – Housing size mix

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12.2 A formal evaluation of the bedroom tax carried out for the DWP, published in Dec 2015 found that “not more than 8% of those affected” had downsized to smaller properties. There was some evidence that larger homes had been re-let, and there had been a “small increase” in the numbers of overcrowded tenants rehoused. Landlords were apparently reporting that there was an insufficient supply of new properties for downsizers to move to.

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12.4 We are also concerned that building so many homes for single people or couples is not reasonable. Older people may need separate rooms and / or space for someone caring for them at some stage. Most single people do, later, have children.

12.5 We are generally concerned that the targets will fail to deliver mixed and balanced communities – particularly in new large-scale development areas.

12.6 We are also concerned that delivery of such high levels of particularly one-bedroom homes is environmentally unsound – families and people sharing produce less C02 emissions and use less water per person.

12.7 We feel that following a reassessment of need for family sized dwellings that a strategic target for delivery should be set.

User:	Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living

H12 (178) - Housing Size Mix

This policy should be amended to ensure older peoples' housing proposals have a flexible requirement with no prescribed mix of units.

Boroughs should not be prescriptive of unit sizes on retirement proposals and need to consider the economics of provision.

Objection: This policy is not positively prepared. We also consider the policy to be inconsistent with national planning policy. We respectfully request that it should be removed.

User: N\A

The removal of targets for family homes.

The New London Plan fails to make sufficient provision for new family homes of three and more bedrooms. This is especially worrying in the context of the removal of the 36% family homes target from the draft Housing Strategy. This will result in there being no policy to encourage family homes.

It is vitally important that there is a target for family homes, otherwise developers and councils will be tempted to predominantly build smaller units that are cheaper and do not provide for communities of tomorrow.

Other proposed policies – such as the small sites policy - actually encourage the demolition of family homes in order for blocks of flats to replace them. It is particularly important, as we increase the number of one and two bed flats available by such large amounts, that we see growth in availability of larger properties to match, so protecting the ones we have is a sound strategic objective. The alternative would condemn expanding families to stay in overcrowded conditions due to lack of available larger properties close to their local support networks. The definition of small sites has been expanded and has become too wide. This seems likely to result in an increase in development on very cramped sites, with inadequate amenity space.

The SHMA methodology should be reviewed in order to ensure that the correct quantities of family housing are being provided. Furthermore, policies that promote two bedroom units as family housing and the use of space standards as a maximum should be resisted, otherwise there will be a dramatic reduction in the production of family homes which will ultimately lead to poor living conditions for future families.

User: London Borough of Camden

The Council generally supports Policy H12, but proposes some amendments in relation to detailed aspects of the policy and supporting text.

The Council's comments on Policy H7 Affordable housing tenure include a number of observations on the accompanying Table 4.3, and these are also relevant to Policy H12.

- Table 4.3 relates more closely to the requirements of Policy H12 Housing size mix than the requirements of Policy H7. We suggest that Table 4.3 should be moved to the paragraphs supporting Policy H12, or that thorough cross-referencing with internal links should be introduced to connect Table 4.3 with Policy H12 and supporting paragraphs.

- We consider that the categories used in Table 4.3 should better dovetail with the categories used in paragraph 4.7.3. As indicated in our comments on Policy H7, we consider the term "low cost rent" to be misleading, as the phrase "low cost" has commonly be applied to intermediate products, notably "low cost home ownership". Reference to the London SHMA 2017 indicates that the “low cost rent” category in Table 4.3 essentially gives an indication of the need for London Affordable Rent, and does not include households who would be able to afford London Living Rent. We note that the “intermediate” category in Table 4.3 gives an indication of the need for intermediate housing of all types, including London Living Rent and London Shared Ownership. Consequently, in our view, the third row of the table should be labelled as London Affordable Rent and/ or Social Rent homes.

- The pan-London indication of needs in Table 4.3 do not necessarily relate closely to local needs at the borough level, and certainly do not closely reflect the needs identified by the Camden SHMA 2016. The Council therefore considers that Policy H12 should recognise more fully that the provision of homes of different sizes should be informed by local circumstances and local evidence of needs; a single Londonwide approach is not able to reflect local needs.

The Camden SHMA 2016 indicates that the housing mix needed in LB Camden is quite different from the mix needed across London. Overall, there is less need for one bedroom homes and a much greater need for two and three bedroom homes.

Housing mix needed for Camden 2016-31 (source Camden SHMA 2016 figure 96)

	1-bedroom	**2-bedroom**	**3-bedroom**	**4-bedroom +**	**All sizes**
Market housing	1,000*	2,400*	2,700*	400*	6,600
Percentage	15%	37%	42%	6%	100%
Affordable	400	3,900	3,600	2,300	10,200
Percentage	4%	38%	35%	22%	100%

*Total market requirement is 6,600, but the rounded figure for the different sizes sums to 6,500, so 6.500 has been used to calculate percentages

The needs identified by the Camden SHMA reflect an extreme skew toward small units in Camden's existing housing stock. The 2011 Census indicates that 70% of all Camden households live in homes with two bedrooms or fewer, rising to 75% for households in social rented housing. Correspondingly, the Census indicates that 11.7% of households overall are overcrowded (bedroom occupancy ratio of -1 or lower), compared with 19.3% for households in social rented housing, and 5.7% for households in owner-occupation and shared ownership.

In this context, the Council considers it essential that Policy H12 should ensure that Camden's particular circumstances are fully taken into account in determining the mix of unit sizes required locally.

In relation to Criterion A, the Council considers that:

- regard should be had to local assessments of housing need wherever they are up-to-date, and the words "where relevant" should be deleted from part (1);

- the list of considerations in Criterion A should include the "the mix of unit sizes in the existing local housing stock";

- in Camden, conversion of the existing stock more commonly takes the form of amalgamations rather than sub-divisions, and part (8) should reflect this by making reference to "pressure on conversion, sub-division and amalgamation of existing stock";

- the relationship between the appropriate mix of unit sizes and the potential for custom-build and community-led schemes is not clear, either part (10) should be deleted from the list of considerations, or its relevance should be explained in the supporting paragraphs.

In relation to Criterion C, the Council's response to Policy H7 sets out the difficulties of providing intermediate homes (including shared ownership and intermediate rent) that are affordable below the income caps of £90,000 and £60,000 respectively. These difficulties are particularly pronounced for shared ownership where the capital value of homes exceeds £600,000, as recognised by the Mayor's SPG on Affordable Housing and Viability. In Camden, the capital value of homes with 3-or-more bedrooms exceeds £600,000 in almost every case, and consequently the Council does not seek intermediate homes with 3-or-more bedrooms. We consider that Policy H12 should be amended to take this consideration into account, either by deleting the words "and intermediate" from clause C, or by including specific recognition in supporting paragraphs that boroughs where the capital value of homes is very high may wish to specify studio, 1-bed and 2-bed homes as their priority unit sizes for intermediate homes.

In relation to Criterion D, the Council considers that:

- as indicated in our comments on Table 4.3, the term "low cost rent” does not dovetail with the terms used in paragraph 4.7.3, and could helpfully be replaced by the term "London Affordable Rent", which more clearly excludes intermediate products including London Living Rent; and

- the list of considerations guiding the mix of affordable housing included in Criterion D and amplified in paragraph 4.12.6 should include any existing skew in the local housing stock towards small homes.

Paragraph 4.12.7 relates to the protection of houses in multiple occupation. The Council supports this paragraph, but does not consider that it relates to Policy H12 on Housing size mix. We consider that this paragraph should be moved to form part of the supporting paragraphs to Policy H10 Redevelopment of existing housing and estate regeneration.

User: Catalyst Housing Limited

Reducing housing pressure and freeing up family housing

It is encouraging to see that the Mayor recognises that one-bedroom units play a very important role in meeting housing need. However, this paragraph appears to omit any recognition of the demand for “smaller” or “shared Living” units which are smaller than the minimum space standards contained with Table 3.1. These units are attractive to professionals and key workers that want to be independent but cannot afford to rent a larger one-bed flat (37 to 50 sqm). Whilst these self-contained units are smaller than the normal rental market unit, they also tend to benefit from a reduced rental level (because of the size of the units) and benefit from shared facilities such as workspace, gym, community space and amenity space.

We respectfully request that this type of product (and the demand for it) is acknowledged in this section of the New Draft London Plan.

User:	Battersea Project Land Company Limited

Policy H12 – Housing size mix

We support part C of the policy, which states that boroughs should not set prescriptive dwelling size mix requirements for market and intermediate homes.

User:	The Highbury Group

H12 Housing Size Mix

Insert new policy;

At least 30% of a new development should be units with at least 3 bedrooms, unless the local planning authority determines that a specific site is unsuitable for residential accommodation for households with children.

Delete H12C 9 (Boroughs should not set prescriptive dwelling size mix requirements for tenures other than social rent)

Explanatory note. This reintroduces a London-wide target for family sized homes, based on the SHMA evidence base, while leaving some flexibility on its application to avoid the provision of family housing on unsuitable sites, and the division between tenures. Boroughs should be able to set local housing size mix requirements by tenure, which are based on evidence and local priorities.

User:	Pocket Living
The wording of Policy H12 (A) is supported as it supports the provision of one and two bed units in central and urban locations and notes the role small units play in freeing up family houses.	

User: Pocket Living

Pocket's innovative model for the provision of intermediate housing for London is primarily a 38sqm one bed-one person unit. Pocket has successfully redeveloped a large number of sites across London and delivered hundrerds of their signature one bedroom one person homes. Pocket is seen as an exemplary provider affordable homes not just in London but worldwide. Pocket's homes are genuinely affordable and meet the definition of affordable housing and intermidate housing in the NPPF and London Plan and have provided the opportunity for hundreds of Londoners to move from expensive private rental accomodation to low cost home ownership. Pocket's pipeline of new schemes will see it delivering thosands of homes across London in the next five years. These homes will help the Mayor meets his housing targets for both housing and affordable housing in London. Indeed, nearly all of the 1,059 homes which we have agreed with the GLA to start by 2021 will be one-bedroom homes.

The reference to lack of flexibility in smaller units is both ill-advised and does not reflect either the quality of what Pocket has achieved or the purpose of one bed one person homes which is to maximise the opportunites of home ownership. Once onto the housing ladder, Londoners have greater choice of housing.

User:	Pocket Living

It is considered that the policy wording in (B) is unnecessary and will have a significant detimental impact on the delivery of homes across London. Furthermore it contradicts the wording of H12(C) which states that LPA's should not set prescriptive dwelling size mix requirements (in terms of number of bedrooms) for market and intermediate homes.

Pocket strongly objects to the proposed wording (where it relates to genuinely affordable and space standard compliant self-contained homes) and requests the Mayor delete Policy H12(B) or clarify the purpose of the wording in the policy and paragraph 4.12.5 to reference non-self-contained and non-space standard compliant schemes only.

User: Pat Turnbull

Policy H12 Housing size mix

A …6)…a higher proportion of one and two bed units generally more appropriate in more central or urban locations. **Delete this sentence. It appears to encourage the removal of families from 'central or urban' locations. The number of families in temporary accommodation or unsuitable private rented properties shows there is a shortage of family housing. Building family housing frees up smaller units for smaller households.**

D For low cost **replace with social** rent, boroughs should provide guidance … to ensure affordable **replace with social rented** housing meets identified needs …take account of:

1) the criteria set out in part A **delete**

2) the local and strategic need for affordable family accommodation

3) local issues of overcrowding

4) the impact of welfare reform

5) the cost of delivering larger units and the availability of grant

4.12.3 Family units have historically been considered to be those consisting of three or more bedrooms. However, as many families do live in two-bedroom units…**Delete this last phrase. It appears to accept as inevitable worsened living conditions for families. What, in our rich 'world city'?**

Policy H13 Build to Rent

User:	London Borough of Haringey
The Council supports this policy	

User: RICS

Institutionalised Private Rental Sector

The Mayor's support for Build to Rent as stated in **Policy H13** is encouraging to investors. An institutionalised Private Rental Sector (PRS) can greatly boost that level of investment in housing while at the same time improving standards through professional management. The RICS has developed a PRS code, in collaboration with other industry bodies, which will support greater standards for tenants as well as provide institutional investors the confidence to invest in a professionally managed product. Of course, this is beyond the scope of the London plan, however, we believe introduction of the PRS code could add momentum to institutional investment into PRS housing. We encourage the GLA to adopt our code.

User:	London Borough of Barking & Dagenham

The Council supports the London Plan in its continued support of the Build to Rent sector housing. The content of Policy H13 *Build to Rent* broadly reflects that set out in Affordable Housing and Viability Supplementary Planning Document (SPG) (August 2017). However, this policy says nothing about buy to let which lacks most of the benefits of build to rent for example longer tenancies, better management etc. Indeed by placing a threshold of 50 units it doesn't control at all the quality of smaller rented developments despite the fact that 35% of supply is envisaged from small sites. Policy H2 rightly focuses on the need for good design of small sites but it also needs to address the issues caused by Buy to Let on small sites which will not be captured by this policy. Greater controls need to be placed on new build sale properties to ensure that were they are bought to rent they are subject to the same standards set out in these policies for build to rent.

User:	London Borough of Lewisham

We support H13 and acknowledge that the Plan notes the structural change in the housing market, leading to tenure shifts and eventually to an ever-growing number of Londoners renting from private landlords in an insecure and largely unregulated market. We are at the

forefront of advocating Build to Rent and particularly the role that London Living Rent has in improving the quality of life for lower income renters. We support the creation of Build to Rent with a fully pepper-potted affordable split in the block with all renters offered longer tenancies - irrespective of tenure - if they want one.

User: London Borough of Brent

The Council supports the principle of the policy but considers that better evidence is required and regular review is required on certain aspects. Whilst there is the potential for PRS to accelerate supply, this might be at the expense of traditional affordable housing. For example at Wembley Park where the majority of new homes from now on will be PRS there has been a significant shift in likely affordable housing delivery rates related to the different viability modelling aspects of the scheme. These initially at least seem to show much lower delivery than that which will be achieved compared to normal market housing.

There should also be consideration given to whether the current threshold for a PRS scheme should be 50 units. Evidence so far tends to suggest that institutional investors are focused on significantly larger schemes.

User:	Save Swiss Cottage

H13 Build to Rent
13.1 ‘Genuinely affordable rent’ (section A) to who? This should be removed.
13.2 We are of the view that this type of sub-market housing should be delivered without access to affordable housing grant.

User:	London Borough of Bromley

The Council notes the policy and the advice in para 4.13.1 that the planning system should take a ‘positive approach’ to the build to rent sector.

User:	London Borough of Hounslow

LB Hounslow strongly support the clarification provided by policies H13, 14, 15, 16, 17 and H18 on other tenure types. However, consideration should be given to ensuring that policy H13 is well regulated so as to ensure they do not provide exploitative and result in poor quality accommodation and its implications on community cohesion and place making.

User: London Councils

London Councils is broadly supportive of the build to rent policy. Build to rent homes can play an important role in creating the mixed communities needed to alleviate London's housing crisis. Build to rent can also create additional affordable housing in London, and due to rental market absorption rates can be delivered faster than traditional market housing. However, alterations to the policy could improve it to better reflect borough priorities.

The definition of build to rent is prescriptive. The policy identifies that developments of only 50 units and above will qualify as build to rent and that developments that are below 50 units should be treated as build for sale. The policy could be amended to allow some flexibility for smaller rental schemes which still meet all the other criteria in the build to rent definition as set out in the policy.

London Councils is particularly supportive of the build to rent approach to fast track applications set out in this document. The provision of 35% or more affordable housing on build to rent schemes is welcome. However, proposes that 30% affordable housing will take the form of London Living Rent
units and just 5% will be in other tenures. On suitable development schemes boroughs could be given more flexibility to negotiate the provision of other affordable housing tenures with lower levels of rent where this better meets local need. However, it is appreciated that this is a new tenure and the GLA's aim is to increase certainty to ensure that a pipeline of build to rent homes is delivered.

The policy also does not provide any guidance on nominations. As the management of both market and affordable units will be carried out by the developer (or a contractor hired by them) it is understandable that they will want control over which tenants they let properties to. However, the GLA can support boroughs which have published intermediate housing waiting lists to have greater control over nominations rights for the discounted market rent units provided as part of a scheme.

London Councils supports the placing of covenants on build to rent development to ensure that they remain in single ownership and that units cannot be sold in a certain time period. With the understanding that this is a new market for London, London Councils believes that a 15 year covenant period should be a transitional arrangement and there is scope to extend this to 20 or 25 years when the market has further matured.

A clawback mechanism that works for boroughs is important and individual boroughs will add their own specific comments on this point. However, it is important that the affordable housing element on build to rent developments is in perpetuity be it through retained on site provision of units or financial contributions.

Built to rent in this form is a relatively new tenure in London. It may be useful to consider lessons learned in other countries (in particular about the delivery of affordable supply). Additionally while London Councils is supportive of the tenure, there can be specific design challenges that we should endeavour to fully understand and ameliorate if appropriate – for example the difficulties of providing dual aspect supply in this kind of development.

User: Be Living Ltd

Policy H13 – Build to Rent We believe that the methodology used to assess the value of BtR and DMR homes in the London Plan Viability Study is potentially flawed and, therefore, the rationale behind the introduction of the 35% threshold for Fast Track for BtR developments could be incorrect.

Whilst we accept that this is a target effectively this threshold is too high and is likely to set aspirations for LAs that are unlikely to be achievable. It is also at odds with the recognition that the BtR sector has distinct economics when compared to housing for sale as well as other beneficial aspects for the local housing offer and economy.

Setting the threshold at this level also means that BtR schemes are unlikely to achieve a Fast Track route through planning requiring the inclusion of Late Stage Viability Review which, as stated previously, is not appropriate for BtR developments.

It appears that the threshold has been set at 35% based on the Viability Study undertaken but as we set out below we believe there are fundamental issues with the way the value of both BtR and DMR values have been calculated which brings into doubt whether the basis for setting the threshold is correct. There are also a number of areas where we feel the viability methodology is inconsistent with the provisions of the draft Plan.

o **Use of DCF as method of assessing BtR value** –given that the vast majority of viability assessments are undertaken using more the traditional residual valuation methodology and that this is the methodology suggested within the most recent RICS guidance, we suggest that this methodology should have been used as the basis for assessing the value of BtR and DMR units in the London Plan Viability Study.

The Technical Report recognises that the form DCF modelling used needs careful operation because of heightened sensitivity to assumptions and it would appear that some of the assumptions used may have not been incorrect – see below.

o **Assumptions used in DCF modelling** – the assumptions made in the DCF modelling appear not to take adequate account of the risks taken by investors during the development, let up and operational phases of the developments life.

The rental stream value of the BtR example in point 40 suggests that this represents 95% of the open market value of the unit. Based on our experience and market evidence this is not representative of the value that can be generated when risks associated with the development phases of the scheme are considered.

o **Assessments of gross to net income** – the quantum of costs associated with the operation of the completed asset are understated. There does not appear to be sufficient allowance for costs associated with the required on-site management, lettings and day-to-day costs (such as cleaning, servicing, H&S and VAT) as set out in the definitions of BtR developments within the draft Plan.

There is no industry benchmark for operational costs but our experience suggests that an absolute minimum of 25-27% excluding any allowance for major repairs/life cycle costs is required.

• **Developer returns** – these are stated in the Viability Study (point 65) to range from 10-13% of GDV. This range is too tight (as a result of being averaged between construction returns and full development risk) and does not adequately reflect the risks (both short and long term) being taken on BtR developments. It is correct that on forward funded schemes developer returns could be lower but in this instance some development risks will be factored into the investor return requirements and, therefore, the estimated GDV value of the development. Returns should be within a range of 10-15% of GDV with the key differentiators being complexity, market demand and building height.

• **Affordability** – DMR homes appear to be assumed, in the viability modelling undertaken to assess viability, to be let at 80% of market rents in Bands C/D/E.

This contradicts Section 4.13.6 of the Plan which states that to follow the Fast Track Route '*30% of housing must be at LLR with the remainder (of the DMR homes) should be provided at a range of discounts below market rent based on local need to be agreed with the borough and Mayor where relevant, for example with half of the remaining units at 50 per cent and half at 70 per cent of market value'*

The rental income from DMR units in the viability modelling has, therefore, potentially been overstated.

• **DMR rent level** - the formula £60,000 x 70% X 40% (set out in the Annual Monitoring Report) effectively sets the maximum rent payable for a DMR home to be affordable at £16,800 per annum.

However, the example in Appendix B (point 40) quotes a ‘DMR rent charged’ of £18,323 per annum for a typical 2-bed DMR home. The rental income and, therefore, value of the DMR unit in the example is overstated by c.£40k as this is assumed to be let at a higher level than is possible under the affordability consideration.

• **Management costs** - Section 4.13.4 states that ‘*DMR homes should be fully integrated into the development with no differences between DMR and market rent units’.*

In Appendix B (point 40) the management allowance drops between market rent, DMR and LLR units. If DMR/LLR homes are to be treated equally then it should be assumed that the costs of managing and operating the homes would be consistent regardless of tenure.

User: London Borough of Tower Hamlets

We consider this policy responds to a number of concerns we had in relation to the Affordable Housing and Viability SPG.

In particular by allowing boroughs to stipulate the affordable housing requirement from such schemes, we can ensure that the delivery of this housing typology doesn't undermine the delivery of affordable housing. Whilst the policy indicates an expectation that boroughs will allow a percentage of affordable housing with a smaller market discount, it would be possible for boroughs where the gap between market values and affordability is larger to require the same affordable housing mix as for market sale housing developments. We also read paragraph 4.13.3 to mean that boroughs could require a range of affordable products – not just discounted market rent. We are supportive of this flexibility as it is our view that larger build to rent scheme, are just as able to provide London Affordable Rent products delivered by a registered provider, as a build to sell scheme.

The policy should also confirm that where affordable housing is delivered in such a scheme it should be allocated via local authority nomination. As stated in the NPPF definition, 'Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing'. Therefore for any housing delivered through build to rent to meet the definition of affordable housing, it must be allocated to those who are eligible. This eligibility can only be determined by a local authority against their agreed housing allocation policy.

The policy is also still silent on space standards. We would presume this form of development would also have to meet the standards outlined in policy D4. We think this should be made explicit within the policy.

User:	Royal Borough of Kingston
No objection.	

User:	London Borough of Hillingdon

Whilst it is acknowledged that Build for Rent has a role to play in housing delivery, this should not be at the expense of developing new homes for sale. Owner occupation is still the tenure that many aspire to and although it requires greater upfront expenditure, the ongoing housing costs are comparable and in some instances less than housing for rent.

User:	HFFTRA

H13 Build to Rent

13.1 ‘Genuinely affordable rent’ (section A) to who? This should be removed.

13.2 We are of the view that this type of sub-market housing should be delivered without access to affordable housing grant.

User: London Borough of Hackney

Boroughs should be able to set affordable housing tenure requirements for Build to Rent schemes locally. There are significant affordability issues in Hackney and the policy should enable Boroughs to decide what proportion of affordable housing should be a particular tenure such as London Living Rent, which is considered to be more affordable locally.

Hackney Council wants to see a well-managed private rented sector that provides truly affordable, decent and safe housing for Hackney residents.

Hackney share the Mayor's 'strong preference' for London Living Rent as the ideal DMR rental product (in paragraph 4.13.4), as a consistent, city-wide and publicly-mandated rent level. We would however want the Build to Rent affordable tenures to more prescriptively require minimum levels of London Living Rent and London Affordable Rent – the current wording provides moral rather than legal weight.

This fast track viability route for Build to Rent schemes (in paragraph 4.13.6) allows for 10.5% of residential units to be provided at London Living Rent. A higher minimum level of London Living Rent should be specified as a threshold for fast track planning.

We propose too that the London Plan Build to Rent policy discourages the bunching of affordable units at upper level income bands by explicitly capping at £60,000 p.a. household income the level at which discounted market rent units are affordable at not more than 40% gross income towards housing costs.

Further guidance would be welcome in the Affordable Housing and Viability SPG on the distinct methods of calculating Build to Rent values rather than in RICS guidance notes, in order to help build confidence around the consistency in viability testing across different Build to Rent applications and for appropriate methodological adjustments in relation to conventional for sale financial appraisals.

The wording on covenants, clawbacks and review mechanisms should provide sufficient flexibility for London boroughs to set longer timeframes (up to or beyond 20 years), especially for high value areas like Hackney where the temptation of developers to convert rent to sale units at the soonest opportunity will be highest.

User: London Borough of Southwark

The policy is similar to the policy P4 in the New Southwark Plan ‘Private Rented Homes’.

However, P4 applies only to schemes providing at least 100 homes whereas policy H13 applies to schemes providing at least 50 homes. It is recommended the policy is amended to allow for boroughs to set their own thresholds.

P4 requires the market rent homes to be secured for a minimum period of 30 years and H13 requires the market rent homes to be secured for a minimum period of 15 years. Again, it is recommended the policy is amended to allow for boroughs to set their own minimum covenant lengths.

The policy states affordable housing may be provided as Discount Market Rent with the majority at London Living Rent. This is broadly consistent with the approach in P4 which requires just over half of the DMR homes to be provided at London Living Rent and the remainder to be provided with a combination of social rent equivalent and DMR with less deep discounts for higher earning households.

Further to the council’s comments earlier regarding the threshold approach to viability, the council urges the Mayor not to open the threshold route to viability to build to rent schemes. The economics of build to rent are fundamentally different to built for sale schemes and the Mayor should ensure there are no unknown incentives to bring forward build to rent development in place of built for sale development.

User:	London Borough of Enfield

Policy H13 ‘Build to Rent’ should draw out the distinct roles of planning policy matters and operational housing matters. The policy guidance should go further to enable Build to Rent developers to compete with market sale developers when acquiring land.

User: London Borough of Wandsworth

The Council is supportive in principle of Build to Rent. However there would be concerns where large scale Build to Rent developments are proposed as to their impact on local amenities, infrastructure and existing residents. We believe that it should be the LPA that determines the suitability of such development in different areas of the borough, as clearly some sites would be better suited to the needs of a more transient population. The Council requests clarification that build to rent is C3 use and not in any circumstances C2 use unless designated for particular purposes – as a Care Home facility or student residences where there is an identified need and an educational institution identified who will use the spaces.

The criteria provide a useful and consistent approach across London, however the policy should not preclude assessment on a case by case basis if a better outcome could be delivered.

User: London Borough of Richmond Upon Thames

The Council recognises that the PRS can assist in meeting a range of needs and be particularly suitable for certain locations, however wholly PRS proposals are unlikely to be supported by the Council where they do not contribute to the higher priority need for affordable housing, given the limited opportunities for sites of 50 units and above.

The Council is concerned in relation to the affordability and usefulness of this product given that it is the highest valued Outer London Borough and in some parts of it LLR would not help to meet evidential housing need for single and couple households. Analysis of the proposed LLR rent levels suggest that for one bedroom homes these would either significantly exceed or be equivalent to market rents. For 2 bed homes in 8 wards these levels are equivalent to 88% market rents, suggesting that the product will not help to meet housing need. Existing evidence from the recently published SHMA, shows the priority is for lower rented affordable homes, having the fourth lowest stock in London.

The SHMA demonstrated that 38% of households have incomes below £40,000, with 19.5% between £40 and £60,000. In only 5 wards in the borough (for two bedroom homes) would the LLR household incomes be below £40000, this would therefore not meet the needs of

households aspiring to form a family and move towards home ownership. The principle of supporting an increased supply of private rented homes with greater security of tenure would be welcomed.

User:	London Borough of Harrow

The Council support this policy.

However, whilst the Council recognises the role PRS can play in offering a range of housing options and accelerating build-out rates, regard needs to be given to the prevalence of such schemes within a locality in order to ensure that mixed and balanced communities are achieved and overall affordable housing provision is not significantly affected. The Policy should therefore make reference to ensuring such balanced communities / localities.

User:	Royal Borough of Greenwich

Support the general approach to Build to Rent development and the requirement for delivery of affordable housing on-site. However, concerned that the affordable housing provision on such schemes will be limited to intermediate rent and the impact this could have on meeting the priority need for social/affordable rent.

User:	Royal Borough of Greenwich
Welcome the acknowledgement of the role that new, non-specialist residential developments in accessible locations play in providing suitable and attractive options for downsizers/older Londoners.	

User:	Berkeley Group

5.25. Development of bespoke build to rent is an important element of housing supply, especially as many young people have to rent for longer. Recognition of the importance of build to rent is welcome. Ensuring the quality of the homes and buildings is important, including ensuring efficient and effective management. We support the proposed threshold of buildings containing fifty homes, and do not consider that boroughs should set different thresholds. Policy H13 footnote 53 should be deleted.

User: London First

We welcome the introduction of the first comprehensive London Plan policy on Build to Rent (BTR). This is an emerging market that can provide high-quality homes and offer tenants professional service and management.

Essential to this growth is an understanding on the part of boroughs about what BTR is and why it is relevant to their local housing needs. In September 2017, we jointly produced a report with London Councils and Turley (Everything you need to know about Build to Rent, London Councils, London First, Turley: September 2017) aimed at councillors and officers, explaining the benefits of BTR. After the local elections in May 2018, we will be organising tours to BTR developments for the same audience.

In addition to changing policy and guidance, the Mayor should consider what else he can do to provide a better understanding of BTR. We would be happy to work in partnership with the GLA on a broader education programme, for example.

As the BTR policy in the Affordable Housing and Viability Supplementary Planning Guidance is transitioned into the London Plan, a balance must be struck between providing certainty on the quantum of affordable housing that is being asked for and the level of the discount these homes have to market rent. A high quantum of affordable housing, for example, is likely to mean that the level of discount to market rent will not be as high compared to a scenario where the quantum of affordable housing is lower, and Grainger have submitted evidence in their response to indicate this.

We welcome that affordable housing (Policy H13 A) in BTR schemes can be solely Discount Market Rent (DMR). While the policy expresses a preference for such homes to be set at London Living Rent (LLS) level, and requires 30% of the 35% of affordable homes to be set at LLR (Policy H13 C), it would be more suitable to allow applicants and boroughs to determine the most appropriate DMR rental levels on the basis of both local need and the viability of the scheme. We are aware that some local authorities have sought social rent equivalent, rather than London living rents / products affordable on £60,000-£90,000 income bands. If local authorities seek social rent, this will inevitably have a significant impact upon the percentage of overall affordable homes when the economics of build to rent are considered.

In an immature market with few real BTR schemes having been developed, the data that is currently available to justify the 35% threshold is not robust enough. While the threshold is an option rather than a requirement, it will undeniably set a political expectation in London, but it is not one at this stage that is supported by sufficient data. This could jeopardise the growth of the sector which in turn will reduce its obvious potential in helping to increase housing supply in London.

User: TUC London, South East and East of England

Policy H13: Build to rent

1. Build to Rent is a laudable scheme where tenants wish to buy in the long-term, but the scheme needs to viable for both public sector and purchases in the medium term in which house prices may not increase in line with inflation, and during which interest rates will rise.
2. If real house prices continue to rise the state can build public sector housing and keep it as an appreciating asset. Presently, public sector money is used to seek to influence private sector provision to meet social needs. Direct commissioning of high quality homes with the mix that is locally desired offers more control, potentially better value for money and along term investment if there is a real rise in house prices in London in the long term.

User: Just Space

H13 Build to Rent

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

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

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

Add at the end: and never exceeding CPI.

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

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

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

User:	London Borough of Bexley

The provision of a definition, in **Policy H13 Build to Rent**, and guidance for a planning covenant to cover specific planning permission for rental development with clawback arrangements if units are sold outside of the rental market is welcomed. Clarity on how affordable housing will be delivered in Build to Rent development models, including guidance on management is also welcomed.

User:	London Healthier Places

The LHP Network acknowledges that there are positive contributions that Build to Rent schemes can give to the housing market, especially if subject to the same fast track affordability criteria of Build to sale property (35% AH). It is however essential that the same high quality of design and minimum standards of space described in Policy D4 should apply to Build to rent developments and that security of tenancy, affordability and access for all communities to this type of housing is ensured.

User:	National Housing Federation

We are supportive of the approach to Build to Rent and recognise its role in increasing housing supply in capital. We are also pleased to see that Build to Rent providers will be held to more comparable affordable housing obligations than those proposed at the national level - it is absolutely right that all housing development contribute towards affordable housing supply.

User: Zacchaeus 2000 Trust

Policy H13 - Build-to-Rent

Z2K does not have a preference for home ownership over renting or *vice versa*. Our key concern is that people have the degree of security they need to make the place they live in a real home, and to enjoy the many advantages of being part of a sustainable community. We recognise that, while the PRS never provided a decent, secure and affordable home for all, for a century or so, institutional investment meant generations of Londoners did at least have a roof over their heads, and for some it was a genuinely settled home. For that reason and others, we understand the benefits of encouraging an expansion of institutional investment.

That said, Z2K is uneasy about the rapid growth of the "Build-to-Rent" sector in London over the past decade. We believe too many of the developments permitted so far have failed to include an appropriate proportion of genuinely affordable homes. Even where the local planning authority has the desire to ensure "Build-to-Rent" schemes include affordable housing too, the difficulties of scrutinising and challenging rental income values has made it hard to ensure targets are met.

The Mayor has clearly tried to address this in his recently-approved Supplementary Planning Guidance on Affordable Housing & Viability. Even this document, however, accepts that *"where a developer is proposing a Build-to-Rent development …. The affordable housing offer can be entirely Discounted Market Rent (DMR)"*. The Mayor's preferred DMR model - the London Living Rent - is specifically designed for households on middle incomes who want to be able to build up savings to buy a home.

Z2K understands the logic of this approach for developers pursuing Build-to-Rent schemes, but we believe the failure to include social housing for homeless and overcrowded families is too great a price to pay. We will never make meaningful progress in tackling London's now chronic housing crisis, unless we ensure all new developments play their part in meeting need. Z2K also concerned about the number of housing associations now pursuing this model themselves, with small flats at barely sub-market rents offering security of tenure only slightly greater than an AST.

As such, if Build-to-Rent schemes are not to include genuinely affordable social homes at London Affordable Rent, then we believe the Mayor of London should discourage them.

User:	Ministry of Housing, Communities & Local Government

The Secretary of State’s Letter in response to the draft London Plan consultation refers to the detail and complexity of policy throughout the document and the need to retain a Strategic Focus in the London Plan.

The Mayor should consider carefully how this policy could impact on the extent to which the Plan can be easily used as part of the planning process. Such issues may be more relevant to the Mayor’s Housing Strategy. We would also welcome seeing the evidence that has been used as a basis to set a 35% affordable housing threshold for Build to Rent schemes.

User:	SEGRO

It is important to the effective function of our customers that their employees have access to good quality housing within the Capital. We therefore support policies which promote the delivery of new and affordable housing, as well as the delivery a mix of housing products (including build to rent) which broaden housing choice and increase the pace of delivery.

User:	London Federation of Housing Cooperatives

H13 Build to Rent

13.2 We are of the view that this type of sub-market housing should be delivered without access to affordable housing grant.

User: U+I

One aspect of the housing crisis that we believe requires urgent attention is the acceleration of the phenomenon we call ‘Hollow London’. Central London is being hollowed out as land values rise and rents become ever more unaffordable to key workers, the younger generation and those on middle incomes, forcing many of them out of Zones 1 and 2.

We believe that one partial solution to this problem can be found in our ‘town flats’ concept - rental-only housing exclusively for intermediate income earning singles and couples looking for thoughtfully-designed and centrally-located housing at London Living Rent levels. There are a number of barriers to bringing these forward and we are keen to explore what might be possible with the Mayor, in terms of using public sector land and making a sensible, controlled and limited exception to space standards. We know there is a real demand for this amongst a group of people happy to trade space for place at a certain time in their life.

User:	U+I

Build to Rent offers an opportunity for middle income earners to secure high quality homes on a low rent basis, improving the mobility of the workforce, while increasing the range of tenures. Evidence from the UK's biggest cities shows that there is the institutional capital available to make the necessary investments, representing a major boost for housing and a useful new residential option for the market. U+I welcomes the fact that the London Plan recognises the benefits of Build to Rent as a distinguishable component of the overall housing market and believes that this is a critical element of addressing our housing crisis. We believe that our concept of Town Flats has the potential to become a key part of a broad spectrum of Build to Rent delivery in London.

User:	Chartered Institute of Architectural Technologists

Policies H6, H7, H8, H9, H10, H11, H12, H13, H14, H15, H16, H17 & H18

We are in agreement with the proposals contained in the plan.

User: Zbig Blonski

Policy H13 – Build to rent

38.Build to rent proposals are not supported as when they are built on a large scale they can undermine the social character and fabric of local communities. They inevitably involve a large amount of short stay occupants and result in their transitional character undermining community life. This is different to the character of affordable housing where occupants do generally not move on such a continuing short term basis due often to their links with an area but also primarily because of their financial inability to do so.

39.A similar approach should be taken as in the case of affordable housing that there should be a mix of tenures and that there should be a limit of 35% of build to rent accommodation in any development of over 25 homes.

User: British Property Federation

We welcome the further development of a Build to Rent policy and proactive approach to codifying this in supplementary planning guidance and now the draft LP. Much of the policy is helpful and we support. There are some aspects, however, that we think could be improved.

We agree that a covenant of 15 years is applicable at the present time, but the exact term of the covenant should be left for individual local authorities to determine. However, the suggestion from the Build to Rent sector is that this figure will increase as the market matures. We think to make that assertion now is premature and that should be left to further development of the policy at a future time.

B6) asks that longer tenancies of three years or more are available to all tenants. We support that approach, but the draft policy goes on to stipulate that these should have break clauses for renters, which allow the tenant to end the tenancy with a month's notice any time after the first six months. Bearing in mind the longer tenancies being given, we do not think it is unreasonable for the landlord to ask for a slightly longer period of notice than would be the norm, and therefore any period up to three months' notice would be more appropriate.

Our most significant feedback, however, is on parts C. and D. of the policy. Part C, stipulates that the threshold approach to Build to Rent should be set at 35%. Part D., however, recognises the difference in financial viability between Build to Rent and Build for Sale developments. Therefore, setting the same threshold seems illogical and will adversely impact the Residual Land Values for Build to Rent and will therefore make it uncompetitive with regards to land acquisition and pricing compared to Build for Sale. This economic advantage given to Build for Sale is in direct contradiction with aforementioned policies aiming to support the Build to Rent sector.

As a result, the LP policy is in danger of stifling London BTR development and at a time when there is strong and growing investment interest in BTR in other regional markets, and therefore diverting vital investment away from London. The LP policy indeed risks squandering what has been an advantage for London of having a well-developed BTR policy. Only politics can explain the evolution in the threshold approach to BTR. What was a policy in the preparation of the Housing SPG, which was to have a separate and specific threshold for BTR that was based on evidence, has become one based on a threshold that bears no relation to evidence.

We estimate, based on advice from our members, that there are very few Build to Rent developments in London that have, or could, deliver 35% affordable housing at the kinds of rents the Mayor prefers. If the Mayor has evidence to the contrary, then it should be made available as part of the Plan's evidence base.

Setting 35% affordable housing for the threshold approach to viability to all intents and purposes means that Build to Rent developments will not qualify for the fast track route to application determination. Worse, however, if local authorities think that is the correct threshold for affordable housing in BTR developments then in the slow track process they will use that incorrect assessment as their opening negotiating position on viability. We would rather see a bespoke, worked-up Build to Rent threshold and would be very willing to assist in its formulation.

Some work has been done in that respect by our members, In undertaking detailed financial modelling comparing generic and hypothetical yet realistic Build for Sale schemes and Build to Rent schemes in London at varying levels of affordable housing and discounts, it has shown that a Build for Sale scheme can pay 29.2% more for land than a Build to Rent scheme on a like-for-like basis (35% affordable housing, with a third of this being offered at 30%, 40% and 50% discount to market levels respectively). Therefore, Build to Rent can only compete against Build for Sale in two scenarios:

35% of units as affordable homes at a 20% discount to market rent, or

20% of units as affordable homes at varying discounts of 30%, 40% and 50% (one third each)[1]

The sector generally has a preference for the second of these approaches in the bullets above. It would prefer to deliver deeper discounts and cater for a variety of Londoner's incomes, than deliver more 'affordable' homes, but at a shallower discount.

It would be helpful to continue dialogue on this aspect of the plan over the coming months and we remain very willing to make our evidence available to the GLA so that a proper bespoke threshold approach to BTR can be developed.

[1] Financial modelling undertaken by Grainger PLC

User: Watkin Jones Group

Policy H13 Build to Rent

The Housing White Paper entitled ‘Fixing our Broken Housing Market’ published in February 2017 outlined the importance of the rise of build to rent schemes. It states that “Our key proposals are to change the National Planning Policy Framework, so authorities know they should plan proactively for Build to Rent where there is a need, and to make it easier for Build to Rent developers to offer affordable private rental homes instead of other types of affordable housing”.

In addition, within the Affordable Housing and Viability Supplementary Planning Guidance 2017 it states that “The Mayor believes that Build to Rent developments can make a particular contribution to increasing housing supply and are beneficial in a number of ways including that they can attract investment into London’s housing market that otherwise would not be there, particularly since Build to Rent is attractive to institutional investors seeking long-term, inflation-tracking returns.”

It is pleasing to see that the Draft London Plan agrees with these sentiments and indeed makes policy provision for Build to Rent schemes. For that reason, the general aims of Policy H13 are supported by the Watkin Jones Group. However, there are some matters that we consider do need addressing to ensure the policy is fair to all parties.

A late stage review that occurs after practical completion of a Build to Rent scheme fundamentally fails to consider the ‘unique economics of build to rent’. The delivery and operation of these projects is often broken down into two phases with a developer achieving planning permission and delivering the scheme and agreeing to sell the scheme to a long-term investor/operator at or usually prior to practical completion, typically under a ‘forward funding’ structure. This is a common deal structure which has been used to deliver a large proportion of the current Build to Rent pipeline and stock in the UK.

A review at, or after practical completion of a build to rent scheme delivers a significant amount of uncertainty and will often be considered an unacceptable risk to a future investment buyer. This will hinder a developer's ability to forward fund the project and in turn could inadvertently reduce the amount of build to rent developments that are delivered, and which are an important housing source. We therefore propose that the late stage viability review does not apply to Build to Rent. Indeed, we also question the need for any viability review after a permission has been granted and the affordable housing requirements agreed with the local planning authority if the development proceeds before the two-year trigger at which it would automatically be required to undertake a review for not commencing. This would remove a significant layer of risk and uncertainty from forward funding transactions and enable the sector to deliver more housing.

As an alternative we would propose that if there is to be a late stage review, this occurs no later than practical completion and the estimated GDV of the development at review will be fixed at the price agreed at the 'first point of sale' (assuming this meets the criteria of an arm's length transaction). This would enable the developer to make a 'clean break' once the scheme has completed and the investor to acquire the scheme for a fixed price. In addition, we also propose that the overall amount is capped at the amount necessary to deliver the policy level of affordable housing (35%) so the investor can be certain of their downside risk.

We welcome the introduction of the 35% fast-track being applied to build to rent schemes, however we do have concerns over the prescribed rate of at least 30% of those being at the London Living Rent (LLR). We consider that the policy is overly weighted towards the London Living Rent. Within the Housing White Paper 'Fixing our Broken Housing Market' published in February 2017 it stated that Build to Rent schemes should be required to provide Discount Market Rented (DMR) properties at 80% of market rent. We therefore consider that the rental mix which the Draft London Plan is promoting is at odds with this and there should be a fairer weighting to ensure that Build to Rent schemes are delivered. No reasoned justification for this split is set out in the supporting text of the policy and we therefore think this point should be reconsidered.

Point 1 of Part B of the policy states that a qualifying build to rent scheme must consist of 50+ units. We would query why this figure has been chosen as it appears to be a completely arbitrary figure with no justification within the supporting policy text to confirm the reasoning for the figure.
Point 3 of Part B of the policy seeks that a clawback mechanism is in place to recoup additional affordable housing contributions in the event of the covenant being broken. We do not agree with this provision as we are concerned that a clawback provision could be overly onerous as it effectively leaves the investor 'locked in' under a 'worst case scenario' which would impact their pricing and the viability of the project. We therefore propose that the clawback is subject to taper relief that steps down every year to effectively equal zero after 15 years.

This gives the investor greater flexibility to pursue an alternative exit strategy if the scheme is unsuccessful as a build to rent project (likely to be symptomised by significant void levels). It is worth noting that in such a scenario it would also be in the GLA's mutual interest for the units to enter the 'for sale' market if this will result in full occupancy.

We propose that the amount of clawback payable is capped at the amount necessary to deliver the policy level of affordable housing (35%) under a conventional 'for sale' scheme at the time of grant of planning consent. This should be off-set by any additional affordable provided under a viability review. We propose that disposal costs are deducted from the market sale in the calculation values to ensure the difference reflects the investors true profits from the break up.

We also consider that in the event that a build to rent scheme becomes a build to sell scheme, that the type of affordable product in the build to sell scheme should be agreed at that stage with the LPA, as it may be that LLR/DMR cannot be operated within a 'for sale' scheme with no Build to Rent operator/manager in place. We would suggest that the most practical solution in this circumstance would be for the LLR/DMR units to be converted to an alternative intermediate product such as Shared Ownership.

User: Claire Mellish

H13 Build to Rent

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

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

I am profoundly alarmed by three other features of the SHLAA:

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

Although 'regeneration' isn't defined in the *Plan*, it's pitched as being a force for good that brings lots of benefits. For many Londoners, however, 'regeneration' has become a dirty word, in part because local communities don't have a say in where and how it happens; in part because it benefits corporations and investors. If the Mayor is serious about sustainable and inclusive regeneration, strong community participation is essential in all schemes from the outset. This would go some way in restoring the democratic deficits currently embedded in regeneration policies.

Just Space's submission to the Assembly Regeneration Committee hearing on Transport and "regeneration" in July 2015 highlighted one of the major weaknesses in regeneration policy: without long-term studies tracking the impacts of regeneration schemes, it's impossible to find out whether it's the original residents and businesses who benefit (or not) from changes in an area, or new people who move in as a result of regeneration. Three years on, these studies are still needed. This research gap goes to the very heart of plan-making and the soundness of the London Plan. How can the Mayor propose policies on regeneration without reflecting on or analysing whether or not previous policies have worked?

User: 313-349 Ilderton Road LLP

Policy H13 Build to Rent states that to recognise that the Build to Rent development model differs from a traditional for sale scheme and the potential role it can play in accelerating delivery, where a development meets the criteria set out below, the affordable housing offer can be solely Discounted Market Rent at a genuinely affordable rent, preferably London Living Rent level. Affordable housing should be secured in perpetuity.

The policy further sets out that for Build to Rent schemes to follow the Fast Track Route they must deliver at least 35 per cent affordable housing, of which at least 30 per cent should be at London Living Rent Level, with the remainder being at a range of discounts below market rent to be agreed with the borough and/or the Mayor where relevant. Schemes must also meet all other requirements of part C of Policy H6 Threshold approach to applications. This threshold and affordable housing tenure split, will be reviewed and if necessary updated in 2021, through Supplementary Planning Guidance.

We support the principle of a Build to Rent policy as this is an important instrument to delivering much needed housing. However, the minimum of 50 units, 15 year covenant and minimum 3 year tenancies all will restrict the provision and limit the delivery of units. Further, the threshold approach to affordable housing could seriously reduce the growth of the Build to Rent sector especially when the sector is relatively new and the viability of affordable housing provision is untested.

User:	Benhill Residents
Genuinely affordable rent’ (section A) to who? This should be removed. We are of the view that this type of sub-market housing should be delivered without access to affordable housing grant.	

User: Elaine Chambers

H13 Build to Rent

‘Genuinely affordable rent’ (section A) to who? This should be removed.

We are of the view that this type of sub-market housing should be delivered without access to affordable housing grant.

User:	Earls Court Public Sector Tenants' Assoc

‘Genuinely affordable rent’ (section A) to who? This should be removed.

We are of the view that this type of sub-market housing should be delivered without access to affordable housing grant.

User:	Silvertown Homes

This is welcomed.

The recognition that affordable housing should entirely be provided as intermediate rented housing, managed by thes ame party as the market element avoids protracted discussion on this matter and so will help bring forwards delivery. Please see comments elsewhere regarding freeing up family housing.

User: London Borough of Newham

Policy H13 Build to rent

Whilst LBN are in support of the policy in terms of the promotion of Build to Rent (BtR), welcoming this product (in accordance with the criteria set out in part B) as part of a broader housing mix within the emerging Local Plan, the approach to affordable housing set out in Part A, C, and D is objected to. LBN's objections to the Threshold Approach have been made clear in the response the draft policy H6. LBN are also of the opinion that affordable housing policy in relation to build to rent should allow for flexibility at local level in terms of mix, type etc. where boroughs have supporting evidence or divergent housing needs. It is unclear as to why, in welcoming BtR, that this product should be required to contribute to only one type of affordable product, regardless of local need.

User: London Borough of Sutton

SUPPORT WITH CONDITIONS: The London Borough of Sutton supports Part B(1) of Policy H13 that allows boroughs to set their own thresholds to reflect local circumstances. The London Borough of Sutton also supports Part B(6) that would allow residents to secure longer tenancies of 3 or more years and Part B(10) that would ensure residents do not have to pay any upfront costs. However, it is considered that Part B(2), footnote 54, would benefit from greater clarity on the period of time that covenant periods are expected to increase by.

Whilst part B ensures that prospective tenants are in a better / more secure position that they would be renting in the second hand or mainstream market and whilst building for rent may attract additional sources of investment and help accelerate delivery, unless rents are genuinely affordable (and preferably at no more than LHA levels) then its contribution to meeting housing need in London is limited.

Para 4.13.3 states that the affordable housing offer of a Build to Rent development can be entirely at Discounted Market Rent, albeit that the Mayor's preference is for London Living Rent. However, the council thinks that it's questionable as to how many households on modest or average incomes could afford to save for a deposit to buy in London, within any reasonable timescale, when they're paying an intermediate rent (even a London Living Rent) plus service charges assuming they're renting a flat. If the policy were designed in practice to support 'Rent to Buy' it would be more acceptable from a housing needs perspective.

User:	Elephant & Castle Properties Co Limited

Policy H13 – Build to Rent. We support the provision of a specific policy for Build to Rent, recognising the contribution it can make to housing and affordable housing delivery. We agree with H13(B)2) that a 15 year covenant is appropriate, but whilst this figure may be expected to increase as the market matures, that should not be specified at this time and instead be deferred to subsequent policy in the future.

User: Argent (Property Development) Services LLP

Draft Policy H13: Build to Rent

Argent supports the introduction of a Build to Rent policy in draft policy H13 which recognises the different approach to sale products. It is noted that Part C of that policy sets out the approach that must be taken for Build to Rent under the Fast Track Route for viability assessment. This is supported, although it should be clarified that the London Plan approach supersedes the adopted Affordable Housing & Viability SPG which states that Build to Rent schemes are not accepted under the Fast Track Route and must be considered under the Viability Tested Route. Consequently, draft Policy H13 should be revised so both documents are aligned.

User: PRP

The inclusion of a specific policy in relation to build to rent is welcomed by PRP as this sector represents a significant increase in housing delivery across the capital in the past 5 years. Whilst a criteria based policy is appropriate to deem whether a scheme falls into a build to rent typoplogy, further guidance and focus is required on the exit strategy of build to rent schemes. On the basis that most build to rent schemes are brought forward with a covenant to secure the units for rental for an initial period, the focus for many PRS developers is on the ability to sell the units as general needs housing after the covenant period has ended.

It is therefore important to ensure that the proposed PRS blocks are designed in a manner such that any future change in tenure to general needs housing is not detrimental to either existing or proposed residents or indeed the character and vitality of the surrounding area, including the potential impact on the local housing market.

User:	Durkan

Policy H13 (Build to Rent) recognises that the Built to Rent development model differs from a traditional ‘for sale’ scheme, an approach that is welcomed. In this respect, the policy should provide more detail on how flexibility can be applied for such schemes, particularly with regard to the scope for micro-units that do not meet residential standards (as set out in the Affordable Housing and Viability SPG).

In addition, a threshold of 50 units is set in order for developments to classify as Build to Rent. Policy H13 should recognise that smaller developments have scope to provide appropriate Build to Rent accommodation, particularly given the focus within the plan on progressing smaller sites.

Therefore Policy H13 should provide additional detail on how Build to Rent can be built out flexibly. In addition, it should include scope for developments of less than 50 units to accommodate new operating models in the future.

User: Footwork Architects Limited

Principle 1
Social needs must be identified and addressed as a prerequisite to development

Description:

Whether creating a new neighbourhood, or regenerating an existing one, to transform the built environment alone will not provide for social needs. There must be a thorough understanding of social context and existing problems, then specific steps identified to address them. Until these social factors are tackled, built environment professionals cannot create the physical conditions to help a community thrive. It is essential to avoid repeating the mistakes of the past and to learn from what has worked, through developing and implementing mechanisms for the measurement of success.

Assessment:
Methodology is already in place to assess local social needs:

- *Index for Multiple Deprivation* (the generally accepted measure)
- *Joint Strategic Needs Assessment* and *Joint Health and Wellbeing Strategies* (see Marmot
- Report and the Social Care Act 2012 – aimed at reducing health and social inequalities)
- *Healthwatch* (for local anecdotal data)

Application:

- Each borough to provide a **Social Needs Assessment** within their *Development Plan* and *Local Plan*, referred to within the *Core Strategy* and detailed as a Supplementary Planning Document, which must be kept updated
- This requirement could be inserted at Policy D2 of the Draft New London Plan, by dividing item ‘A’ into two parts. New ‘A’ to be an evaluation of socio-economic and well-being factors, heritage/ character and social infrastructure (currently points 1, 7 and 11); and new ‘B’ an evaluation of the data relating to physical and environmental factors (all the remaining points)

- Local authorities, Clinical Commissioning Groups and other service providers to take steps to address existing social needs, identified in the Social Needs Assessment and against agreed benchmarks, as a pre-requisite for designating *Opportunity Areas*, *Local Areas for Regeneration* and *Strategic Areas of Regeneration*
- *Supplementary Planning Guidance* (SPG) to be prepared (perhaps combined with the SPG on Social Infrastructure currently being reviewed - see below). This must be referenced in all strategic and major development proposals, with the inclusion of a Social Needs Assessment and a strategy for how identified local social needs and well-being are to be taken into account
- *Design Review Panels* to consider strategies to address social needs and well-being as an agreed component of the quality of a design. This must also to form part of the Mayor's planned Guidance on Design Reviews
- *Post-occupancy Surveys* (RIBA Plan of Work Stage 7) to become a contractual obligation for all major housing developments, at 1 year and 5 years after full occupancy. This will be an invaluable reference point for Development Plans and should be obligatory

[Policy GG2: 1.3.1, 1.3.2
Policy GG3: A, D
SD9: 2.10.2, 2.10.1, 2.10.3, 2.10.4; 2.10.5
Policy D2: A
Policy H13: 4.14.1
Policy S2: A: 1; 5.2.7, 5.2.8]

User: Deloitte LLP

Policy H13 Build to Rent

Deloitte firmly believes that the Build to Rent sector (BTR) will play a vital role in meeting London's housing needs. Through its partnership with GLL, the firm recognises how important the rental market is to London, particularly for younger generations who are looking for employment, but are either unable to or do not wish to own their own homes. We support the London Plan's approach to having a specific strategic policy for BTR, given the benefits to residents of occupying professionally managed accommodation.

Deloitte would like to ensure that the Build to Rent policy in the London Plan will enable new developments in the sector, and that it does not introduce unintended obstacles to BTR schemes coming forward. In particular, we are aware that it is very difficult for BTR providers to acquire sufficient land at viable prices to meet growth plans, and we support calls for a levelling of the playing field in the land market. In particular, providers need greater certainty about levels of affordable housing and rents that can be charged, so that they can bid for land at a level that is competitive with providers of homes for sale.

In this context, Deloitte makes the following comments on the approach to Policy H13:

- Benefits of Build to Rent – paragraph 4.13.1 helpfully confirms that the planning system should take a "positive approach to the Build to Rent sector to enable it better contribute to the delivery of new homes". Deloitte suggests that Part A of Policy H13 should also include this positive encouragement to the sector, particularly to reflect the benefits that are expressed in paragraph 4.13.1. We also suggest that paragraph 4.13.1 should include an additional important benefit about the role of BTR in helping to provide housing to support London's economic growth benefit, reflect the principle in Part D of draft Policy GG5.

- Affordable housing – Deloitte considers that the London Plan should include a lower threshold level of affordable housing to enable BTR schemes to take advantage of the Fast Track viability route. Parts A and D of Policy H13 recognise that there are differences between the financial viability of Build to Rent and Build for Sale developments. It is therefore unrealistic to expect the BTR sector to achieve a 35% threshold before it qualifies for the Fast Track Route. The 35% threshold establishes a political expectation that this level of affordable housing should be provided in BTR schemes. It will substantially increase the risk, time and cost of the planning process for BTR projects, while reducing certainty to the sector. The high threshold will also make it harder for BTR providers to compete in the land market to acquire sites, as the higher expectation on affordable housing will significantly reduce financial offers. A lower threshold for BTR will create increased certainty for the sector, will support its ability to meet the growing need for professionally managed rental accommodation, and will reduce the cost of taking projects through the planning system.

- Discount Market Rent – Policy H13 is currently unclear about the approach to achieving Discount Market Rent units (DMR) and how to qualify for the Fast Track viability route. Part A suggests the “preference” for DMR at London Living Rent, and Part C states that the range of other discounts below market rent should be agreed with the borough and/or the Mayor “where relevant”. The policy should provide more certainty about what levels of rent should be provided in order to qualify for the Fast Track Route, as the default may be for schemes to be automatically sent down the Viability Tested Route. We also question whether it is relevant that BTR should be required to satisfy “all other requirements” of Part C of Policy H6 Threshold approach to applications, particularly the requirements to take account of the strategic 50% target and to seek grant funding to increase levels of affordable housing.

- Allocating specific sites – Deloitte supports the principles in paragraph 4.13.13 that boroughs should allocate specific sites for BTR and include an element of BTR in large sites. However, we suggest that these principles should be explicitly included in Policy H13.

We would be pleased to discuss these comments with officers at the GLA. We will also continue to work with the GLA to explore how to encourage other large businesses to follow Deloitte’s programme of supporting staff in meeting their housing needs in the private rented sector.

User: Provewell Limited

Reference (Part B of policy) 1): the development, or block or phase within the development has at least 50 units

It is understood that at the footnote of this policy, it states that boroughs may set their own thresholds to reflect local housing market circumstances and affordable housing needs. However, Provewell requests amendment to the wording of this part of the policy to indicate a greater flexibility on the 50-unit threshold and/or to clearly state that the threshold is subject to local market circumstances. It should also be noted that the 50-unit threshold is restrictive in terms of site capacity, which may limit the number of sites coming forward and thus, limiting the number of new homes to be delivered.

Reference (Part B of policy) 4): All the units are self-contained and let separately

Provewell requests for clarification on this point as it does not appear to consider different types of uses including the emerging warehouse living uses, which can also be considered to fall under a Build to Rent development model. Specifically, clarification is requested as warehouse living units generally consists of multiple bedrooms with communal living areas, rather than multiple self-contained units.

User:	London Borough of Ealing

The Council supports this new policy and acknowledges the increasingly important role this sector plays in meeting housing delivery.

User:	London Chamber of Commerce and Industry

Policy H13 Build to rent

72. LCCI has cautioned against prioritising delivery of homes to own over homes to rent, with a thriving and affordable rental market crucial to London given the make-up of its workforce (including those seeking short-term or flexible tenures). The Mayor should work with local authorities to ensure sufficient numbers of homes to rent are included in new developments, and support London gaining greater powers to determine for itself which types of affordable homes - including homes rent - should be built locally.

User:	Aberdeen Standard Investments

Policy H13 – Build to Rent

We support the thrust of this policy which provides a fast track viability assessment route for Build to Rent properties, bringing the tenure in line with for sale housing. Notwithstanding this, the comments set out above in relation to Policy H6 also apply to Policy H13.

User:	Gravesham Borough Council

Build to Rent
The growth of the Build to Rent (BTR) sector is acknowledged and welcomed within the document with specific policy H13. We support the recognition that BTR can help accelerate the delivery of housing in the capital and that it is particularly encouraged in town centre locations.

We are unsure about the decision that has been made that BTR can qualify as part of affordable housing if it meets certain criteria (pg184). We understand that the affordable component can be solely Discount Market Rent but London Living Rent is the preference. BTR is also able to qualify for the 35% ‘fast track’ route where 30% is London Living Rent and the remainder at discounted rents (pg181). All other affordable routes are to follow the Viability Tested Route.

User:	Hornsey & Wood Green Labour Party

We support these proposals, with the proviso that the standards identified in Chapters 2 on Design and 9 on Infrastructure are rigorously met.

User: James R Brown & Company Ltd

Proposed Draft London Plan Policies H6, H13,
H15, H17 & H18.
Financial Viability Orientated Representations.
1/3/2018
Proposed London Plan Policies H6, H13, H15, H17 and H18 are not justified by robust viability evidence because the evidence in the London Plan Viability Study ('LPVS') is fundamentally flawed and/or wrong.
We assume that there is an onus on the GLA to provide appropriate evidence to justify the proposed London Plan policies and that, where this evidence is missing or lacking, the consequence will be (or should be) that the proposed policy cannot be adopted.
The London Plan Viability Study ('LPVS') is fundamentally flawed and/or wrong because:-
(N.B. We refer to the main body of the LPVS as the LPVS and its accompanying Technical Report as the LPVSTR below).
a) Support or Inform:-
Para 1 of the LPVS Executive Summary says its purpose is to 'support' the new London Plan. However, this implies a fait accompli as surely the main purpose of the LPVS should have been to 'inform' the potential policies in the new London Plan.
As the LPVS is dated December 2017, it would not seem credible that the proposed new London Plan policies were generated almost immediately thereafter. Para 1.2.4 of the LPVS suggests that consultation on the proposed London Plan started at the end of November which pre-dates or almost coincides with the LPVS.
The LPVS appears to have been written to support pre-determined policies in the new London Plan rather than inform policy making which is in-appropriate and undermines its credibility as 'evidence'.
b) Intervention & Justification for 35%:-
Whilst planning policy has been intervening in the affordability and consequential value of housing for some years now, is this fundamentally legal and/or a planning policy matter? What

part of what law permits and/or promotes this?
c) Data Sources, Analysis and Non-Ascertainable Logic through to Conclusion:-
The LPVS/LPVSTR is a very thin on data, detail and analysis.
We have regularly seen more substantial viability reports relating to a single site.
There is no clear audit trail from data to conclusion, especially as there are no explicit financial viability appraisals provided. As such, the LPVR does not represent evidence.
d) Incorrect and/or Misrepresented Data:-
We are familiar with the Savills forecasts on page 16 of the LPVS but the LPVS fails to clarify that these forecasts do not apply to ‘new build’ which London Plan policies are aimed at.
Furthermore:-
? the forecasts listed on page 16 of LPVS are already out of date as most of the cited forecasters have since pegged back their growth forecasts, and;
? the LPVS fails to use ‘independent’ data sources rather than estate agent forecasts (who might wish to avoid gloomy predictions). Forecasts from independent bodies (e.g. MOLIOR) should feature.
Assuming the LPVS has used incorrect and/or has misrepresented base data such as this throughout, the LPVS is not professionally reliable.
e) Build Costs:-
Although the build cost rates are reported to have been produced by Turner & Townsend, this is not evidence in itself. Detailed comparable contract evidence is surely needed to justify these rates to represent ‘evidence’.
In our experience the build cost rates suggested by Turner & Townsend are un-realistically low even if they relate to total scheme GIAs (which the LPVS fails to clarify). If they relate to NIAs The LPVS needs to provide extensive and explicit evidence regarding build costs as, at the moment, the build cost rates used are unclear and un-substantiated.
f) Model:-
Although one cannot see any of the financial viability assessments that we assume the authors of the LPVS have prepared using the Three Dragons/GLA Toolkit, we question why the authors (i.e. The Three Dragons et al) have used the Three Dragons/GLA Toolkit software bearing in mind the vast majority of viability consultants (acting for either Councils and/or applicants) dispensed with this as an inferior model several years ago.

Independent reviews of the Three Dragons/GLA software (e.g. by BNP Paribas) have previously confirmed that it is inferior to software such as ARGUS, so why use it?
We fully expect the appraisals prepared by The Three Dragons et al in the LPVS to contain ‘error equivalents’ as a consequence of the software used which undermines its conclusions.
g) General Approach to Viability Testing:-
The LPVS makes no reference to (and does not appear to have given any consideration to) the RICS’s Guidance Note 94/2012 (Financial Viability in Planning).
The RICS has been the pre-eminent professional institution representing the UK property and development industry for many decades.
To evade guidance provided by the RICS ignores input from most of the UK development industry which is not reasonable and questionable.
Charles Solomon (now head of viability at the GLA) was part of the Core Working Group that produced the RICS GN 94/2012 and so one would reasonably expect viability studies instructed by the GLA to consider it.
h) Approach to BLVs (echoing the Mayor’s Affordable Housing SPG and referred to in notes to proposed London Plan Policy H6):-
The approach used within the LPVS to derive BLVs is misguided and the evidence used is not evidence.
In our opinion, the RICS’s guidance on arriving at BLVs as set out in their GN94/2012 is well thought through and reasonable, albeit unavoidably open to some criticism.
However, certain stakeholders in the planning system are seeking to dismiss the RICS’s guidance in favour of guidance within the Mayor’s Affordable Housing SPG which is open to a lot more criticism.
There is no perfect approach and cannot be for a variety of reasons.
The LPVS has heeded the Mayors guidance on viability and therefore inevitably concludes what the Mayor’s Affordable Housing SPG promotes. This is a major problem as the required approach to viability within the Mayor’s Affordable Housing SPG is echoed within the proposed London Plan (particularly via H6 and Sections 4.6.1 to 4.6.15).
We have already made representations on the Mayors Affordable Housing SPG and its viability guidance and we would re-iterate everything we said therein (see Appendix A).
Via the new London Plan, we feel the Mayor is in-appropriately seeking to politically intervene in

the free market via the planning system by unduly influencing/directing how Benchmark Land Value (‘BLVs’) should be arrived at (whereupon the required approach is also poorly defined). We think the Mayor’s guidance needs to be less prescriptive.

Via Section 4.6.10, 4.6.11 in the proposed London Plan plus the Mayor’s SPG and the LPVS/LPVSTR, the narrative is in danger of practically enforcing the use of ‘EUV plus a land-owner’s premium’ (“EUV Plus”) as the only acceptable approach to BLVs. The Mayor and the proposed London Plan (including numerous references to the Mayor’s Affordable Housing SPG) effectively supress Alternative Use Value (“AUV”) and/or Market Value (as defined by the RICS in their GN 94/2012) as an approach to BLVs.

In reality, land values are ultimately determined by the market and prospective vendors of land will always consider AUVs and Market Value before selling. Meanwhile, purchasers of development land will usually seek to minimise what they need to pay for development land and so it would be wrong to assume that they readily over-pay.

‘EUV Plus’ is poorly defined compared to the extensive/clear definition and explanation provided by the RICS for Market Value in their GN 94/2012. AUV is also poorly defined but is effectively a component of Market Value.

With respect to EUV Plus, the key question is what the ‘Plus’ bit should be? For no apparent or logical reason, the GLA and their supportive consultants keep pointing to ‘20%’ on numerous projects we have worked on but this is arbitrary. It also makes no sense whatsoever on sites that are cleared but have obvious ‘alternative use’ potential.

The Mayor’s Affordable Housing SPG says that land-owner’s premiums “could be 10 per cent to 30 per cent, but this must reflect site specific circumstances and will vary”. This Mayoral SPG wording is in danger of being interpreted to mean land–owner’s premiums should or must be 10% to 30% which is highly problematic and in-appropriate. We think the London Plan needs to absolutely clarify this if the EUV Plus approach is to be endorsed as the preferred approach (and/or used as alternative terminology for Market Value as defined in the RICS’s GN 94/2012).

In reality, the ‘Plus’ percentage or sum (as there is no logic to suggest it should ever be any particular percentage) will or should take the BLV up to the sum that is equivalent to Market Value (as defined by the RICS in their Guidance Note GN 94/2012, as opposed to the ‘Red Book’, and whereupon full regard to planning policy must underpin development land purchaser prices). This may well be via the identification of alternative use development potential.

Some people point to ‘Parkhurst’ as important appeal case precedent on the topic of BLVs.
At the Parkhurst appeal (APP/V5570/W/16/315698) the Inspector considered an SVB of £6.75m to be reasonable even though the EUV was negligible or, at best, up to £700,000. Whatever terminologies one wants to use, the Inspector effectively considered a BLV equivalent to EUV plus 868% as reasonable. This confirms that it is not appropriate or reasonable for the Mayor or any Council to try and claim that a land-owner’s premium should be 20% or within the range of 10% to 30%.
The Mayor’s Affordable Housing SPG requires that landowner premiums are justified and yet, ultimately, there is no way of justifying any particular landowner premium (be it zero, 20%, 300% or £3m) without some kind of reference to land transaction evidence as it is otherwise arbitrary. Whilst the Mayor’s SPG indicates that the level of premium can be informed by benchmark land values that have been accepted for planning purposes on other comparable sites, we do not think this is reasonable. It would not necessarily mean a 20% premium (for example) is reasonable just because 20% was agreed (by way of an incidental ‘equivalent’ percentage) on a neighbouring site. Firstly, it may not have been ‘agreed’ but rather accepted under protest and, secondly, it would be equally reasonable to suggest that if a BLV equivalent to £10m per acre was agreed on a neighbouring site, that £10m per acre should be applied to the subject site – whether this equates to a premium over and above EUV of 20% or indeed 300%. In other words, references to and/or the application of land-owner’s premiums via ‘percentages’ is in-appropriate and the London Plan should clarify this.
Furthermore, AUVs (which are effectively a component of Market Value) should not be supressed by the wording of the proposed London Plan policies and/or by its references back to the Mayor’s Affordable Housing SPG. The London Plan should support the use of an AUV and/or Market Value approach where the subject site is cleared (i.e. with no physical existing use thereon). N.B. We are currently working on a cleared un-contaminated 3.8 acre site in an urban centre in a south-eastern London Borough where a prolific viability consultant to London Boroughs and the GLA is seeking to apply a BLV of £1 based upon EUV Plus. In practice, this is where EUV Plus can lead (i.e. to a nonsense).
A BLV is the most crucial assumption within financial viability assessments and yet contention still exists with regard to how these should be reasonably derived.
There is no meaningful, logical or reasonable evidence supporting the Mayors guidance to

viability. The RICS is apolitical and is surely the appropriate body to provide guidance in this regard.

Returning specifically to the LPVS/LPVSTR, this seeks to use BLVs agreed on certain planning consents by alleging that BLVs in associated S.106 Agreements (e.g. within review clauses) were ‘agreed’.

We believe most of the LPVS BLV examples cited in Annexe J to the LPVSTR are connected to one particular viability consultant who only act for certain Boroughs and who will not negotiate on their approach to BLVs at local level (i.e. effectively EUV Plus only). However, we were involved in some of those projects where we know the BLVs were/are not agreed and that the applicant was practically force fed the EUV Plus approach by the Councils advisor (with the Mayor’s SPG in the background) and where the ‘Plus’ bit has typically been 20% without evidential justification. In some cases, this has led blighted and un-implementable consents.

Furthermore, there are only 35 BLV examples relied upon by the LPVS in Annexe J across only 13 London Boroughs. This is a completely deficient sample size and a fundamental flaw which undermines the LPVS.

Para 2.1.12 in the LPVS confirms that land values (and therefore BLVs) “should be informed by comparable, market-based evidence but excluding transactions above the norm”. The LPVS does not present and has not considered any true comparable market-based evidence. This should reasonably include actual development land transaction evidence and analyses thereof.

i) Profit:-

Para 2.5.6 of the LPVS says its viability testing assumes a ‘private developer’.

Clearly, the identification of reasonably necessary profit targets to private developers is therefore crucial to determining viability.

The LPVS states at Para 2.5.4 that “residential values and profit targets have been compiled by Housing Futures Ltd”.

Having sought to establish what experience Housing Futures Ltd have with regard to residential values and profit targets, there is very little information available on the internet and we cannot find their web site. It appears that Housing Futures Ltd may be a person called Peter Redman who, some internet references say, has ‘worked in social housing for 40 years’ including a number of housing association and local authorities.

With respect, we are concerned that 2 crucial assumptions (i.e. profit targets and values) that

are fundamental to the LPVS's conclusions and London wide planning policy have been 'compiled' by a consultancy that might not have sufficient experience in this regard. Furthermore, it is not clear what 'compiled' means in context. Have they determined what reasonable profit targets are?

The LPVS makes no mention of having gathered any evidence from Banks, financial intermediaries, equity and mezzanine financiers/funders with regard to what they need to see as prospective development profits in order to satisfy their conditions precedent to lending across a variety of property types and development risk profiles. If this evidence has not been obtained and considered as part of the LPVS, the LPVS cannot be credible as, without funding, development cannot happen.

At the moment, we are not convinced that sufficient evidence has been obtained and analysed to determine what a reasonable/necessary development profit is across the various housing, quasi-housing and mixed-use development projects considered within the LPVS because it is not apparent.

j) Finance Costs:-

Table 5.15 (page 34) in the LPVS indicates that the GLA have instructed the authors of the LPVS what finance rates to use. Surely the authors of the LPVS should produce evidence and express a justified opinion in this regard? This is not evidence.

Although Table 5.14 suggest that the GLA have evidence to support the instructed finance rates, we have looked at 'The Value, Impact and Delivery of Community Infrastructure Levy' (University of Reading, Three Dragons, Smiths Gore and David Lock Associates – Feb 20127) for example but see nothing in there that represents evidence to support any particular finance rate assumption.

Our experience of finance rates to the average hypothetical developer is that they are significantly higher than the GLA are suggesting including finance facility fees (which should not be ignored). Up to date explicit evidence is required regarding finance cost assumptions before the LPVS can be considered credible in this regard.

With respect to footnote 50 on page 34 of the LPVS, it is not appropriate to spread land finance costs over half the development period as professional development valuers would confirm. It is usually reasonable to spread finance costs on construction in this way because construction costs are indeed spread over the development period. However, finance costs on land

compound from the day of purchase and usually continue compounding until the end of the development (or close to) unless the development is substantially phased (which is rarely the case with student accommodation development). This indicates that, in all likelihood, the results from the LPVS's viability testing of their 2 student development archetypes are wrong for this reason alone.

In conclusion, finance rate/cost assumptions significantly affect viability tests and yet the LPVS provides no evidence in support of its assumed rates/costs and has also applied them incorrectly with respect to land finance. This undermines the LPVS's conclusions regarding student accommodation development.

Proposed London Plan Policy H17 should not be adopted for this reason.

User:	Landsec

Policy H13 Build to Rent: We welcome the Mayor’s recognition of the importance of Build to Rent homes (BTR) but like the BPF and London First we are concerned with the draft Plan adopting the same 35% affordable housing threshold as build for sale. We encourage the GLA to consult with the BTR sector in an open book manner to establish a suitable lower threshold for BTR developments, that will enable it to be viable, compete fairly for land and help deliver the quantum of new homes required.

User: Mr Gary Hayes

H13 Build to Rent

13.1 ‘Genuinely affordable rent’ (section A) to who? This should be removed. 13.2 We are of the view that this type of sub-market housing should be delivered without access to affordable housing grant.

User:	Mr Drew Stevenson

Policy H13, referring to Build to Rent, says in Para A “Affordable housing should be secured in perpetuity.” This is welcomed, but I do not see this requirement in the main Affordable Housing policies.

User: Moda Living Limited

An overly restrictive use of residential space standards which do not recognise the high levels of amenity and comprehensive recreational provision which are integrated and fully available to residents within a Moda Living Build to Rent regeneration project. As an investor, developer and operator of Build to Rent properties, it is important that decision makers acknowledge that the highly efficient use of space within a Build to Rent property throughout the lifetime of the building is essential to creating a viable and developable product together with an integrated community. Greater flexibility in the interpretation and application of these standards should form a key element of emerging Policy D4 entitled “Housing Quality and Standards” and Build to Rent Policy H13.

The imposition of overly aggressive financial viability appraisals can have a significantly detrimental effect on the ability to deliver new high-quality Build to Rent homes. It is important that decision makers and Build to Rent Policy H13 recognise that the financial modelling of a Build to Rent regeneration product is distinctly different to an open market development. Whilst emerging policy has begun to acknowledge this difference, it is essential that decision makers recognise not only the importance of the Build to Rent market in providing high quality homes and a diversity of choice but also acknowledge these modelling differences particularly when applications are presented to planning committee. The managing of targets and expectations in relation to affordable housing provision and Section 106 obligations is an essential element of delivering fully managed high-quality Build to Rent homes.

User:	Moda Living Limited

The imposition of overly restrictive Community Infrastructure Levy (‘CIL”) payment terms on Build to Rent developments has a direct and detrimental impact on the ability to deliver new high-quality Build to Rent homes. Greater flexibility in the phasing of CIL payments should form a key element of emerging Build to Rent policy.

User:	Moda Living Limited

Overly restrictive car parking standards which require the provision of inappropriate levels of car parking that exceed the requirements of the Build to Rent market given the excellent sustainability credentials of this use. Greater flexibility in the interpretation and application of these standards should form a key element of emerging Build to Rent policy in the London Plan.

User:	Moda Living Limited

It is essential that the Build to Rent investor, developer and operator has overall and unfettered management control of a single landlord Build to Rent development to ensure the comprehensive long-term quality and lettability of the product which is a vital element of securing the investment required to deliver new Build to Rent homes.

User:	Andrea Carey Fuller

‘Genuinely affordable rent’ (section A) to who? This should be removed.

We are of the view that this type of sub-market housing should be delivered without access to affordable housing grant.

User: Lendlease

We welcome the inclusion of a policy on Build to Rent within the draft Plan. We also welcome the Mayor's proposed use of a Build to Rent 'pathway' through the planning system, with 'principles' defined that are intended to provide greater clarity and consistency in approach. However, our strong view is that both fewer restrictions and more clarity are required to enable Build to Rent opportunities to be fully realised in London.
We have concerns over some elements of the definition.

The proposed requirement for a covenant of 'at least 15 years' is too narrowly defined. In the first instance, the time period becomes a threshold by the use of the terms 'at least'; it creates more uncertainty and the scope for greater inconsistency across London and could make investment decisions in this sector - and in particular schemes - potentially difficult. Fifteen years could be set as a benchmark covenant period but with scope for flexibility, subject to particular circumstances regarding viability etc. We would suggest the definition instead reads as follows:

"…Given that the market is now maturing, the Mayor expects to see all schemes having a covenant of 15 years but with scope for flexibility depending on particular circumstances regarding viability etc."

We do, however, recognise that the 'modus operandi' of Build to Rent developments can include the offer of longer tenancies than those that are standard in the wider private rented sector – particularly in the Buy to Let rental market. However, the potential for offering longer term tenancies stands outside the legitimate extent of planning control. We would instead suggest that the ambition for longer tenancies is included in the supporting text.

We also object to the requirement for London Living Rents in part C. Analysis supporting our representations to the Affordable Housing and Viability SPG in February 2017indicates that the London Living Rent would fluctuate significantly across wards and could have unintended consequences for the provision of affordable rented housing. Examples of possible ‘fluctuations’ that could arise from London Living Rent relate to development locations (especially, outer vs inner London wards), affordability levels and potential delivery rates.

If a comparison of affordable rent and London Living Rent is made, what emerges is that London Living Rent varies more across London’s wards, as the cap is set at the same level (i.e. 80% market rent) but London Living Rent changes according to the median household income at ward level. This could, therefore, lead to the delivery of heavily discounted units in some parts of London (especially Inner London), where house prices are higher and median household incomes are lower; accordingly, it is fair to assume that where London Living Rent will be set at lower rates (e.g. East Ham North in Newham) the number of units delivered will be lower while, on the other hand, where London Living Rent will be capped at 80% market rent (e.g. Upminster in Havering) developers will be able to deliver the same number of units as for affordable market rent.

Therefore, our previous analysis suggests that this intervention could lead to an uneven distribution of both Build to Rent schemes and London Living Rent products across London. Accordingly, London Living Rent may not always be appropriate, having regard e.g. to location, development viability, eligibility and affordability, and if these potential consequences are not fully assessed before the SPG is finalised, the guidance could lead to the imbalanced delivery of Build to Rent across London. Part C should be removed as is could disincentivise build to rent development in central and highly accessible areas where it may well be particularly suitable. It is ineffective.

User: Moda Living Limited

In Chapter 4 entitled “Housing” in the draft plan, Policy H13 focused specifically on Build to Rent is introduced. Moda Living welcomes and supports the introduction of a specific Build to Rent policy within the London Plan.

Moda Living welcomes the recognition within the draft London Plan that Build to Rent offers a different model to the traditional ‘for sale” approach and can play an important role in providing high quality residential accommodation and accelerating housing delivery.

Moda Living also welcomes the recognition that Build to Rent operators can manage discounted market rent (“DMR”) homes as affordable provision without the need to introduce a third party registered provider.

As highlighted earlier, the imposition of overly aggressive financial viability appraisals can have a significantly detrimental effect on the ability to deliver new high-quality Build to Rent homes. It is important that Policy H13 does not seek to impose standardised rental thresholds within the London Plan which should be the subject of a carefully considered analysis on a case-by-case basis as part of a detailed viability assessment process. Where a viability assessment process is followed, reference to the London Living Rent (paragraph 4.13.4) should be considered in the context of the conclusions and recommendations of the viability assessment and the levels of affordability which can be sustained by the specific development being assessed rather than against a non-site specific approach advocated within the London Plan.

User: Unknown

Our client welcomes the further development of a Build to Rent policy and proactive approach to codifying this in supplementary planning guidance and now the draft LP. Much of the policy is helpful and is supported. There are a small number of aspects, however, that they think could be improved.

The Build to Rent Policy is very prescriptive and is not a Strategic Policy. The policy has a number of requirements which will be difficult to achieve.
The BtR sector already offers longer tenancies when compared to other forms of rented homes. This is seen as good practice within the industry as it secures a more stable long term income stream, fosters stronger communities and improves tenant retention. However, whist the sector is still at an early stage in its development, our client does not consider it is reasonable for planning authorities to set minimum tenancies. It is likely this would undermine investor and developer confidence in BtR and in turn reduce delivery. Many funds will not loan on schemes with leases more than 3 years as they are no longer considered to be Assured Shorthold Tenancies. Furthermore, our client's research shows that despite offering up to 3 year tenancies, the overwhelming majority choose 12 month terms. Our client has not yet had a customer elect for anything more than 18 months to date.

Our client generally agrees with criterion B2 that a covenant of 15 years is applicable at the present time. Their most significant feedback, however, is on parts C. and D. of the policy. Part C, stipulates that the threshold approach to Build-to-Rent should be set at 35%. Part D, however, recognises the difference in financial viability between Build-to-Rent and build for sale developments. Therefore, setting the same threshold seems illogical.

Our client estimates that there are very few Build-to-Rent developments in London that have, or could, deliver 35% affordable housing. If the mayor has evidence to the contrary, then it should be made available as part of the Plan's evidence base.

Setting 35% affordable housing in the threshold approach to all intents and purposes means that Build-to-Rent developments will not qualify for the fast track route to application determination. Worse, however, if local authorities think that is the correct threshold, then in the slow track process they will use that incorrect assessment as their opening negotiating position. Our client would rather see a bespoke, worked-up Build-to-Rent threshold and would be most willing to assist in its formulation. As currently drafted H13 provides little, if any, incentive toward the delivery of BTR over market for sale and it certainly won’t unlock the additionality required if London is to meet its housing targets.

User: L&Q

Build to Rent

The draft Policy stipulates that build to rent schemes deliver 30% housing at London Living Rent levels, amongst a total of 35% affordable housing. The presumption is that the remainder is also provided on a discount market rent basis. There are however circumstances (for example to aid viability and so allow a development to come forward) that an applicant may prefer an alternative mix. This could include shared ownership.

The draft London Plan should be revisited on this basis.

User: Aberfeldy New Village LLP

Policy H13 (Build to Rent)

We welcome the inclusion of a policy on Build to Rent within the draft Plan. Institutional investment in the private rented sector is growing and it provides a complementary product to traditional for sale housing which can speed up delivery rates. This aspect of it is particularly compatible with the Mayor's ambitious growth targets. The viability assessment requirements for Build to Rent should not adversely impact upon delivery. In this regard future viability assessments on BtR developments, other than a pre-implementation review, are not appropriate or workable for BtR developments and should be specifically excluded.

Build to Rent deals are usually forward funded by a future asset owner or are sold during the development period. Under both of these scenarios the asset owner/investor is looking for certainty of return and is taking market risk. They will be providing a fixed level of capital based on a long-term view of how the asset will perform. It is, therefore, not appropriate for a review to be undertaken after a short period of time and for any uplift to be shared as there may be issues affecting the performance of the asset over its lifetime on which the asset owner will have taken a view. In addition, the investor/asset holder will not have allocated additional capital to cover such an eventuality and the develop will have sold the asset and no longer have any involvement in the development.

Part D of this policy should go further than recognising the differences between Build to Rent and Build for Sale development and explicitly state that post commencement viability reviews will not be sought on Build to Rent deals. This is necessary to make the policy effective.

User:	Standard Life Investments

Policy H13

We support the thrust of this policy which provides a fast track viability assessment route for Build to Rent properties, bringing the tenure in line with for sale housing. Notwithstanding this, the comments set out above in relation to Policy H6 also apply to Policy H13.

User:	Elephant Amenity Network

13.D While we think that it is appropriate that all BtR developments should provide a viability assessment, we do not think it is appropriate to apply different measures or adopt different assumptions for BtR than for any other free market housing development, for reasons given below 4.13.2.

13.E We cannot see the purpose of allowing schemes which are part BtR and part build for sale and the Plan does not state what benefit they might bring. We can see that such schemes will have complicated affordable housing requirements, which will allow developers an opportunity to game the system.

User:	Elephant Amenity Network

4.13.1 ‘Positive’ support for any kind of housing, including BtR, should be based on assessment of relative housing needs and which tenure is most appropriate for those needs, rather than following market trends. Notwithstanding the claimed advantages of BtR it should still be required to deliver the same levels and type of affordable housing as traditional ‘build for sale’ schemes; BtR will otherwise become the preferred option for developers who do not want to provide true affordable housing, particularly social rented housing.

User:	Elephant Amenity Network

4.13.2 BtR is free-market housing and a model chosen by the developer for what they hope is their profitable advantage. There is no reason why any disadvantages, such as slower rate of return, should be compensated for by a loss of affordable housing, or the exclusion of lower value, social rent. The benefits of the ‘maintain(ing) the integrity’ of BtR development are unexplained. In fact, management will by rental management companies, not dissimilar in their functions to registered providers and Plan should therefore require that registered providers should manage the affordable housing (see 4.13.3 also).

User:	Elephant Amenity Network

4.13.3 To repeat our comment to 13A - no substantial case is made for allowing Build to Rent (BtR) to deliver Discounted Market Rent as opposed to social rent and intermediate for sale housing. BtR should be required to deliver the same kind of affordable housing as traditional for sale schemes; in particular it should be required that it delivers social rented housing, for which there is overwhelming need. Further, it is not apparent why a form of housing that does not deliver the same levels of rented affordable housing, at the cheapest cost to the tenants, should be encouraged.

User:	Elephant Amenity Network

4.13.4 London Living Rent (LLR) is an intermediate housing product, designed for those who wish to eventually wish to purchase their homes. There is therefore no reason why it should be adopted as the benchmark rent level for DMR homes, which are not for purchase. Further LLR is the most expensive of the various kinds of sub-market rented homes and its adoption as the benchmark will exclude those who can only afford social rents.
Notwithstanding this, if it is the Mayor's intention to moderate DMR levels to LLR, then it should be stated as a requirement of the Plan, not just a 'preference'.

User:	Elephant Amenity Network

4.13.6 In line with our comment above 13.C, and notwithstanding our comments that the BtR affordable housing requirements should be the same as build for sale schemes, and our objection to the Fast Track Route under 4.13.10, the level of London Living Rent required to qualify for the Fast Track Route should be the entire quantum of affordable housing and that should be 50%.

User:	Elephant Amenity Network

4.13.9 Please see our comments to 13.B)2 and 13.B)3 about the inadequate length of covenant and clawback mechanism.

(13.B)2 The covenant period is too short and should be at least 30 years. We note footnote 54 states the period is expected to increase as the market matures. We would suggest that it is for the London Plan to set this parameter.
13.B)3 The need for a clawback mechanism indicates that BtR developments will be sold out of the rental sector before the end of the covenant period, should it be in the developer's interests to do so. It is unlikely that they will be deterred if the profit is great enough.)

User:	Elephant Amenity Network

4.13.10 All BtR schemes should be subject to full viability assessment with the aim of maximising affordable housing. This is particularly needed because the Plan acknowledges that the BtR market is not a mature one and to establish that encouraging BtR is justified by the results.

User:	Elephant Amenity Network

4.13.12 We are concerned that the encouragement of BtR by the Mayor and further encouragement via the boroughs (by requiring a BtR element in developments) will be at the expense of social rented housing, which, while the cheapest form of affordable housing for rent, is yet the least encouraged. The first bullet point should be removed.

User: Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living

H13 (180) – Build to Rent

This proposed policy creates a further possible ‘route’ for addressing affordable housing policy within the DLP which has not been properly tested within the DLP viability analysis and is inconsistent with the NPPG.

It is proposed that Build to Rent proposals qualify for the ‘fast track route’ as long as they provide 35% affordable housing, of which 30% must be at a ‘discounted rent’ (‘**preferably**’ London Living Rent) with the remainder to be determined by the local planning authority. This creates a further ‘tier’ to the tenure requirements set out within DLP policy H7 which creates considerable uncertainty.

The impact of the various approaches has not been adequately tested and puts at risk the delivery of overall housing targets set out within the DLP. This approach is inconsistent with national policy in the form of the NPPG which promotes a comprehensive and consistent approach to the viability testing of local plans.[2] Furthermore, the NPPG advocates the testing of viability for build to rent proposals on a case by case basis due to the unique funding requirements for such proposals.[3]

A recent appeal decision at Cheam[4] reaffirmed the requirement for London Plan policy to retain consistency with national policy with the Inspector in this case highlighting the inconsistency of the Draft (at the time) Homes for Londoners SPG with the NPPG (see paragraphs 40 and 41).

Objection: This policy is not positively prepared and creates considerable uncertainty. We also consider the policy to be inconsistent with national planning policy.

[2] Paragraph: 004 Reference ID: 10-004-20140306
[3] Paragraph: 018 Reference ID: 10-018-20150326
[4] Appeal Ref: APP/P5870/W/16/3159137

User:	London Borough of Camden

The Council generally supports more development of homes built specifically to rent and the provisions of Policy H13.

User: Pat Turnbull

Policy H13 Build to Rent

This whole section needs to be rethought. As it stands it does not look as if this sector will deliver anything like the type of housing that meets Londoners' needs.

User: Balfour Beatty

Policy H13 - Build to Rent The policy recognition of BtR, which can contribute significantly to the delivery of new homes, within the New Draft London Plan is welcome. However, affordable housing requirements will impact on the ability of BtR to be offered at discounted rents on the basis of the efficiencies that can be achieved and do not take account of the ways in which BtR is funded. Indeed, the London Plan Viability Study (December 2017) shows that viability for BtR housing is more challenging that for sales housing, which reflects that fact that BtR schemes are often funded differently. Generally, a careful balance must be struck between requirements for the amount of affordable housing and the level of the discount on market rent. A large amount of affordable housing, for example, is likely to mean that the level of discount to market rent will not be as high. We also welcome the proposal that affordable housing in Build to Rent schemes, as set out in proposed Policy H13 A, can be solely Discount Market Rent. While the policy expresses a preference for such homes to be set at London Living Rent level, it would be more suitable to allow applicants and boroughs to determine the most appropriate rental levels that reflect both local need and the viability of the scheme, and the Draft New London Plan should not be prescriptive in this respect. As it is currently written, proposed Policy H13 B2 does not understand how covenants work in the BtR sector. BtR providers will have a covenant applied by the developer; boroughs seek to apply their own covenants and the Draft New London Plan is also seeking to apply a covenant. Balfour Beatty believes that the Mayor should consider reviewing the approach to covenants with providers. In an immature market with few BtR schemes having been delivered, the data that is currently available in the London Plan Viability Study (December 2017) is not robust enough to support proposed Policy H13's affordable housing position. The initial position through the threshold approach, that 35% of housing delivered as part of BtR schemes should be affordable, will undeniably set an expectation in London, as with sales housing. This in our view is counter intuitive and could jeopardise the growth of the sector and housing delivery.

Policy H14 Supported and specialised accommodation

User:	Mr Liam Kelly

Whilst it clearly can’t be a legal requirement of the plan, an advice note to ensure aids and adaption’s are maintained as a permanent feature of the affordable housing units in all new development. LA’s currently frequently remove these when doing void turnover’s of their stock.

User: London NHS Clinical Commissioning Group

Policy H14 Supported and specialised accommodation and Policy H15 Specialist older persons housing

We welcome Policies H14 and H15 and the supporting text which support the provision of sufficient residential or nursing care accommodation and specialist older persons housing which will help to reduce admissions and re-admissions into hospital and speed up discharges from hospitals. However, for many older people support and care can be provided at home, without the need to move to specialist accommodation. Nevertheless, homes that have not been modernised or adapted, can lead to chronic and acute illnesses and lead to reduced mobility, falls and depression.

Paragraph 4.15.1 recognises that by 2029 the number of older person households (aged 65 and over) will increase by 37%, with households aged 75 and over (who are most likely to move into specialist older persons housing) increasing by 42%.

The plan identifies a demand for over 4,000 specialist older persons units a year between 2017 and 2029. However, the GLA Older Persons Housing Needs Assessment Report (Three Dragons Nov 2017) study notes that only 471 new homes a year have been permitted in the past two years. As a result, a step change in the delivery of specialist older persons housing older is needed in London and it is widely recognised that more housing options are required, particularly extra care housing.

We support Table 4.4 which provides annual borough benchmarks for specialist older persons housing between 2017-2029. However, the benchmarks are not provided by type or tenure, unlike Table A5.1 of the current London Plan provides benchmarks for private sale, intermediate sale and affordable rent. It is also considered that private/market rent could play an important role. The distribution of provision and need is uneven across London and a concentration of accommodation in one area will place pressure on services, including GP, community and hospital healthcare. To deliver a step change in the delivery of specialist older persons, we suggest that the Plan needs to give a stronger strategic direction to the type and location of specialist housing needed in London.

In addition to specialist housing, the supporting text should refer to Policy D5 Accessible Housing which requires all new homes to be ‘accessible and adaptable dwellings’ (Building Regulation M4 Category 2) with 10% ‘wheelchair user dwellings’ (Building Regulation M4 Category 3). By creating new accessible and adaptable homes this enables older people to remain in their homes for longer.

Care homes will continue to play an important role to provide accommodation for older people who require personal or nursing care. To meet the predicted increase in demand for care home beds to 2029, paragraph 4.15.10 states that London needs to provide an average of 867 care home beds a year. The GLA Older Persons Housing Needs Assessment Report 2017 notes that about two-thirds of the increase in provision could come from new build and the rest from remodelling current stock. It would be helpful if the supporting text could be clearer to state a strategic requirement for new build provision, the locations where further new build provision would be preferred, and support the aim to continue to improve the quality of existing care home provision. Paragraph 4.15.9 refers to the total number of older people with dementia in London predicted to rise from 73,825 in 2017 to 96,939 in 2029, an increase of 31%. It states there “is currently no clear evidence identifying the best method of provision of dementia care or accommodation, and it is likely that a range of solutions will continue to develop”. Paragraph 5.3 of the GLA Older Persons Housing Needs Assessment Report 2017 refers to a range of options, including dementia villages, cluster schemes and extra care / retirement villages.

Paragraph 4.15.9 states that Boroughs should consider the need for accommodation for people with dementia within specialist older persons housing developments. Given the importance of the issue and the need for strategic direction we consider that this requirement should be part of Policy H15.

User:	Kingston and Surbiton Constituency Labour Party

We welcome the greater use of EDMOs and control of short-term lets (4.11.1) also support for specialist accommodation (Policy H14) and attempts to reduce the speculative building of student accommodation (H17).

User:	Chartered Institute of Architectural Technologists

Policies H6, H7, H8, H9, H10, H11, H12, H13, H14, H15, H16, H17 & H18

We are in agreement with the proposals contained in the plan.

User:	Notting Hill Housing Trust

As mentioned in response to Policy H12 Housing size mix, NHHT would support the LPAs identifying suitable sites in their Strategic Site Allocations as providing specialised housing can make an important contribution to freeing up general needs family housing.

User:	British Property Federation

We believe it is right that boroughs undertake assessments of the short and long-term accommodation requirements for different groups of people. As noted in our response to D5: Accessible Housing; accommodation must be as diverse as the Londoners it is seeking to house, to truly meet the needs of the capital. Existing accommodation options should be reviewed, and shortfalls identified; if available, current homes should be refurbished to a standard set against minimum criteria. The population of London is a transient and mobile one and as such, boroughs must work across their boundaries to meet their diverse needs.

User:	London Borough of Newham

Policy H14 Supported and specialised accommodation

LBN are supportive of this policy in principle and consider that it currently aligns with specialist housing policy of the Local Plan and ongoing work as part of the its Infrastructure Delivery Plan

User:	London Borough of Sutton

SUPPORT. The London Borough of Sutton notes the provisions of Policy H14 and supports the clause that requires supported and specialised accommodation to meet an identified need.

User:	Alzheimer's Society

1. Recently Alzheimer’s Society identified a significant issue around people with dementia who are medically fit to be discharged but don’t have somewhere to move on to. Policy **H14.A.3** identifies the need for re-ablement accommodation which would help with this need. When the placement and design of this accommodation is considered, it should be done do with people with dementia in mind. However we are also aware people with dementia are often not considered for this option, and the plan should highlight the opportunity for all to be eligible for re-ablement accommodation.

User:	Defend the Whittington Hospital Coalition

- **Residential units for NHS staff -** Building co-located residential units for NHS staff mitigates many problems in a single sweep, e.g. staff located near to work will be housed locally in good quality housing allowing them time to rest rather than commute and would be a big selling point when recruiting NHS staff.

User:	YMCA

LONDON YMCA CO-OPERATIVES/ CO-LIVING/ APPRENTICESHIP CAMPUS

YMCA has a rich tapestry of social and supported housing developments. Diverse increasingly complex challenges - from land-prices to loneliness - require innovative models. YMCA to use its expertise in supported housing and community infrastructure to deliver communal living models that support tenants - and the wider neighbourhood - to thrive. These models will be inclusive and intergenerational: with rooms available for all ages and targetting those who could otherwise not afford to live in London. Apprentices in particular will be catered for, and have access to our re-skilling and development gyms.

User: London Borough of Camden

The Council generally supports the development of supported housing dedicated to groups with particular needs and the provisions of Policy H14.

However, we are concerned about the general reference in Criterion A (2) to accommodation for young people, as this could be interpreted as support for student housing, and 'co-living' schemes which are effectively equivalent compact living developments aimed at a wider range of young people. We consider that Policy H14 and the supporting text should be clarified to indicate that these provisions relate to dedicated provision where occupation is restricted to a specific groups with specialist housing needs, and provide cross-references to the policies providing for wider groups of students and other young people, namely Policy H17 Purpose-built student accommodation and Policy H18 Large-scale purpose-built shared living.

User:	Association of Directors of Public Health

In terms of Policy H14 we would like to see a commitment to a proportion of supported and specialised housing being affordable, and recommend an amendment to H14 A: **The delivery, retention and refurbishment of supported and specialised housing which meets an identified need should be supported, and there should be a commitment to a proportion of this supply being affordable.**

User: Women's Resource Centre

H14 – Supported and specialised accommodation

- The Plan acknowledges the priorities for supported and other forms of social housing and aims to tackle homelessness. What is missing however is the hidden state of Women's homelessness, not counted separately for example within the rough sleepers statistics.
- There is generally a lack of data on women and housing issues in London neither Government nor the Mayor's office provide sufficient gender breakdown of the statistics they publish.
- Cuts and changes to social security benefits, including but not only relating to housing benefit have worsened the housing crisis for women.
- There is huge importance in improving the housing strategy to incorporate Women's needs. Without a home, everything else fails.

"Women's homelessness requires forms of preventative intervention and service models that recognise and respond to women's specific needs."[6]

- 78 women and 78 children are turned away from refuge on the average day. About 1 in 4 referrals to refuge services in 2015/16 were declined due to lack of spaces.

User: McCarthy and Stone Retirement Lifestyles Ltd.

Dear Mayor,

DRAFT LONDON PLAN (2018) REPRESENTATIONS

This is a joint representation made on behalf of Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living. As the market leaders in the provision of sheltered housing for sale to the elderly, we consider that with our extensive experience in providing development of this nature we are well placed to provide informed comments on the London Plan (referred to as 'the DLP' from here on) consultation, insofar as it affects or relates to housing for older persons. Together we as a group are responsible for developing in the region of 90% of England's specialist owner occupied retirement housing.

Each of the aforementioned companies has historically sought to develop a greater presence in London and in so doing has taken steps to actively engage with the Mayor of London and the London Boroughs in the preparation of planning policy. Regrettably, we have collectively felt that our individual representations voicing concerns over emerging policy and protocol have not been given due regard and as such we are increasingly concerned that we will be unable to provide much needed specialist housing for older persons within London. We are subsequently making this representation collectively which we hope will encourage the Mayor to consider our views more seriously and, if necessary to jointly challenge the DLP should the delivery of housing choices for older Londoners be prejudiced.

The Identified Need for Specialist Owner-occupied Housing for Older People

In terms of the specific need for housing for older people, the 2017 London Strategic Housing Market Assessment states the following:

London is expected to experience substantial growth in its older population over the coming years. The number of people aged 65 or over is projected to increase by 73% between 2016 and 2041, and the number of those aged 75 or more by 94%.

While many older people will continue to live in mainstream housing, a growing number are likely to require specialist accommodation. Research commissioned by the GLA identified a total potential demand across all tenures for just over 4,000 'C3' specialist homes for older people over 60 years of age (both extra-care and sheltered housing) every year between 2017 and 2029.

We do not accept the reference to Extra Care uses under the classification of use class C3 and we have not seen any detailed work to support this amalgamation of targets for specialist accommodation for older persons. The Borough-level benchmarks for the provision of specialist accommodation based on this research are set out in the draft London Plan but do not include a tenure breakdown of need as per the current London Plan's Annex 5. We consider the removal of the tenure breakdown to be ill-advised and contrary to guidance and good practice.

The research also identified a need for 870 new 'C2'care home beds a year, including units designed to support the needs of people with dementia.

The need for specialist housing for the elderly is clear; moreover the fact that previous projections are incorrect by circa 20% does raise serious questions. It is clear that a large constituent of London's population mix will be made up of the elderly and a diverse range of accommodation to meet their needs will be required. Further development must also be encouraged and not stifled with overly prescriptive policies and constraints. It must be remembered that this is a strategic policy document.

A Strategic Plan

The Mayor sets out at paragraph 0.0.20 that the DLP deviates from current national planning policy in a number of respects. The Mayor asserts his local political mandate to further justify these departures. There are instances in the DLP where the deviation from national policy is significant and has much wider consequences for other areas of the country. While the desired outcomes of the DLP are largely understood, deviation from national policies and particularly housing policies to such an extent as proposed in the DLP is problematic for many reasons. The NPPF sets the foundations for establishing planning policies for housing across the country and to an extent provides certainty for the industry to enable investment and growth. The more detailed HBF representations in this respect are supported.

Furthermore, the purpose of the London Plan, or similar document, is set out within Part VIII of the Greater London Authority Act 1999 (Section 334). It is clear that the purpose of the London Plan is to provide an overarching strategic plan, not to impose top down targets, or to provide prescriptive policy, which should be at the auspice of the relevant local authority.

The DLP should only deal with matters of strategic importance to Greater London and as such the prescript detail contained within proposed policies within the DLP is not appropriate in many cases.

The DLP goes significantly beyond its function as a strategic document; the level of detail currently in the policy is more akin to a core strategy or local plan document. In our view, policies are overly detailed and too prescriptive for a strategic document causing the DLP to overstep its remit. Paragraph 182 of the NPPF details the criteria by which the policies of a local plan are assessed in order to be considered to be "sound". While the soundness tests as set out by the NPPF are not benchmarks by which the London Plan in its position as legislation supported by the GLA Act 1999 (as amended), we believe these are nationally accepted 'yardsticks' which provide important guidance to plan-makers. We believe the lack of clarity in the role of the London Plan is such that the policies have not been evidenced to the extent where they can be considered sound, and indeed we consider that a number of policies contradict and conflict with each other.

An example would be the proposed policies in relation to older people's housing, which on the one hand (DLP Policy H15) promotes a step change in the delivery of this type of housing from an estimated 200 unit per annum to 4,000 units per annum. On the other hand, the Mayor is proposing to make the delivery of older people's housing consequently more difficult than is already the case in a London context by inflicting even greater risk on developers (DLP Policy H5, H6, H7, H9, H12). This approach is illogical and has been proposed without consultation with the industry as the Mayor expects the industry to increase output in this sector by **2000%** per annum (from a current estimated supply annual of 100-200 units).

The review of the London Plan is fundamentally flawed as it exceeds its remit as a strategic document yet does not provide the required level of evidence to be sufficiently robust to justify the detail of the policies proposed.

Summary

In general, the group strongly supports the recognition by the Mayor of the significant need for specialist housing for older people in London. The introduction of a specific policy (H15) is certainly a move in the right direction to achieve the desired outcome of enabling a step change in delivery of this type of housing in London. However, the Mayor needs to go much further in our view to create a policy environment across London which facilities this growth.

The group do not consider that the current approach to the DLP is fit for purpose. The plan is too prescriptive in nature and insufficiently evidenced to justify such an approach. We consider that the DLP would be deemed unsound during Examination in Public. We consider a radical rethink of the policies is necessary and that the DLP should be comprehensively redrafted to fulfil its role as a strategic plan. Should this not be the case, we would wish to be heard at Examination and formally state our intention to do so.

We have highlighted within our representations, a number of draft policies within the DLP which in our view will negatively impact delivery of housing for older people across London.

Going forward we would be happy to assist in formulating workable policies, which would help with the delivery of the Mayor's housing aspirations. With this in mind the group would be willing to meet with the Mayor and his policy advisors to discuss in further detail how the DLP can be shaped to facilitate growth and address housing need in the specialist older persons housing sector.

We look forward to receiving acknowledgment of receipt of our comments and further contact from the Mayor and his policy advisors on this matter.

Policy H15 Specialist older persons housing

Policy H16 Gypsy and Traveller accommodation

User: Mr Ray Smith

Whilst I support the positive message in policy H16 in general there are two major aspects to which I object. The first, and main one, is that there is no reference within this policy whatsoever and frankly inexplicably to Travelling Showpeople who whilst part of the overall travelling community in some respects have separate needs which have been recognised in Government Guidance since 1991 and were fundementally part of the previous considerations around the London Plan including the GTTSAA in 2008 to which this section refers. At that time there were 185 plots with circa 900 people living there and a need for an additional 85 for 425+ people. They have now disappeared from this report's consideration.

Showpeople living on privately owned land and many of the communities in London have been in the area for over100 years. They provide leisure and entertainment for events large and small from Winter Wonderland to local fetes and of course many fairs in London parks where they not only entertain the public but also pay significant fees to the local authorities. They are part of all religious festivals from Christmas and Easter, Eid and Diwali, the Chinese New Year and many more. Without showpeople there would be no theme parks as these evolved from the industry and they also provide quality mobile catering and other services. Their exclusion is astonishing.

Showpeople living spaces are defined as plots to differentiate them from Pitches for other travellers. This is because a showperson's site requires space for fairground equipment adjacent to the home to protect it and space for maintenance. An average plot will be 0.5 hectares but these do vary. There have been no new sites since 2008 but some boroughs have permitted expansion of existing ones and I give praise to Bromley in particular.

The definition quoted in the 2008 survey is the one I would suggest taking that of members of an organised group of Travelling Showpeople or Circus People whether travelling together as such They include those who may have ceased travelling either temporarily or permanently due to their changed patterns of work, or their families' health or educational needs, but excluding Gypsies and Travellers.

The omission of showpeople will even during the consultation period give difficulties for showpeople as it will indicate to local authorities and others that Showpeople are not considered to have any status in the mind of the Mayor and an early indication this will be rectified will be appreciated.

The second objection relates to Showpeople and also to Gypsies and Travellers. At the EiP of the 2010 London Plan the Panel accepted the views of the Showmen's Guild and the representatives of the Travelling Communities that need identified should not just be the responsibility of the boroughs in which the travellers lived, otherwise travellers would be effectively ghettoed in areas where they already live which is poor planning. Regional need, from neighbouring areas, should be a factor in joint working and this improves planning as land in one borough where there are no Travellers or showpeople may meet the needs of those communities nearby. Furthermore where need arises outside the GLA boundary, for instance in Thurrock where Europe's largest site for showpeople is around 250 metres from the Haringey border, should be recognised within the policy.

The land needed to meet the appalling conditions of all sections of the Travelling Community, including Showpeople, is very little and this is a "problem" that can be solved with political will and courage. The failure to include Travelling Showpeople is shocking.

User: Cllr Evelyn Carpenter

I strongly support the new Policy H16 on Gypsy and Traveller accommodation.

I am pleased that the Draft Plan has an inclusive definition of Gypsies and Travellers. I have been very concerned about the Government's planning definition which does not recognise all Gypsies and Travellers. The government's definition in my view does not comply with the Equalities Act 2010, and discriminates against groups with protected characteristics under the Act.

I attended a meeting of the London Gypsy and Traveller Forum at the GLA on 13 February 2018 about the draft London Plan where there was vociferous support for targets being set for Gypsies and Travellers' accommodation in the same way that there are housing targets by borough for housing completions as set out in detail in Chapter 4 on "Housing". I believe that not treating Gypsies and Travellers' housing needs in the same way as the housing needs of other Londoners is inadvertently discriminatory.

I hope the final London Plan will set targets for Gypsies and Travellers additional pitches by borough with speedy timescales for completion of new pitches and sites. It is heart-breaking that a lack of policy direction in this area has led to no growth in sites and pitches for many years in spite of an assessment of need by the GLA in 2008. As a result, Gypsies and Travellers have been forced into fixed "bricks and mortar" housing detrimental to their culture, and health and well-being.

I support the reference to Mayoral funding set out 4.16.8. London boroughs will need substantial funding from the Mayor to enable them to address the special housing needs of Gypsies and Travellers.

Policy H16 refers to boroughs doing a new assessment of need of the accommodation needs of Gypsies and Travellers but does not specify timescales and completion targets for meeting the assessed need. Without more robust direction, what guarantee is there that there will be any change at the borough level to make sure that the unmet accommodation needs of Gypsies and Travellers is appropriately met in a timely way? Past history here does not inspire confidence that the policy here, without more teeth, will lead to positive change.

Policy H 16 section F states that boroughs should actively plan to protect existing Gypsy and Traveller accommodation capacity and this should be taken into account when considering new residential developments to ensure inclusive, balanced and cohesive communities are created. This statement is supported.

However, boroughs will need clearer direction from the London Mayor to ensure this happens. The Mayor should provide more direction here. The policy on new Gypsy and Traveller sites as part of the regeneration of areas of London for housing and other purposes needs to be strengthened. For example, Gypsies and Travellers' pitches and sites require a larger footprint of land compared to other types of housing: these will be in competition for space with housing for other priority groups such as homeless people, for example. In these circumstances, without firm and clear direction from the London Mayor, it will be difficult for boroughs to prioritise the accommodation needs of Gypsies and Travellers.

Paragraph 4.16.5 refers to insufficient pitch provision leading to a rise in unauthorised encampments. Sometimes, unauthorised encampments happen as Gypsies and Travellers carry out their traditional and nomadic way of life as they cross London. There is a need for a small network of stopping places across London for Gypsies and Travellers to enable to move across the region without causing distress and friction to settled communities.

The draft London Plan is deficient because it does not recognise the need for stopping places for Gypsies and Travellers which is different from the need for additional permanent pitches and sites for Gypsies and Travellers. This has implications for the London Plan's sections on Spatial Development, the Economy, and Heritage and Culture, for example, as well as the chapter on Housing.

The London Mayor needs to give firm direction to London Boroughs to enable a network of stopping places to be identified in consultation with Gypsies and Travellers, and then implemented. My own borough, the London Borough of Barking and Dagenham, is willing to partner with neighbouring boroughs in the provision of a stopping place for Gypsies and Travellers to prevent unauthorised encampments. Sometimes, unauthorised encampments are used by criminals to dump toxic waste leading to very high costs for the local authority, or businesses, in cleaning up sites. These unauthorised sites used for criminal purposes are also damaging to the reputation of an area which may be ear-marked for regeneration.

My borough is willing to partner with neighbouring boroughs to provide a stopping place to support Gypsies and Travellers nomadic way of life, and help combat criminal activity causing pollution and distress to residents and businesses in the area.

However, my borough does not want to be the only stopping place in the London region: this would not be a sustainable position either for the local authority or the Gypsies and Traveller communities.

Therefore, the London Mayor needs to lead a London-wide initiative to identify a network of stopping places across the region. The London Plan ought to include this duty for the London Mayor, and also identify the responsibilities of London boroughs to comply in collaborating together to identify and implement a network of stopping places across the region.

Just as the London Plan refers to Mayoral funding (paragraph 4.16.8) to support the accommodation needs of Gypsies and Travellers so Mayoral funding will be needed to fund the capital and revenue costs of the network of stopping places for Gypsies and Travellers. This will help support both the traditional nomadic way of life of Gypsies and Travellers, their culture and heritage, and boroughs deter criminals using unauthorised encampments to dump toxic waste creating pollution and damaging the environment.

Cllr Evelyn Carpenter

Cabinet Member for Education Attainment and School Improvement

Champion for Travellers and Gypsies

London Borough of Barking and Dagenham

User:	Mrs Sarah Witney
I agree with this policy	

User: Mr Ray Smith

Dear Colleagues

I have for 12 years worked for the Showman's Guild of Great Britain on a variety of matters including Planning. I worked at the time Mayor Livingstone was drafting a Plan which was then taken over by Mayor Johnson.

Mayor Livingstone quite specifically and in accordance with the then Government Policy arranged a full London wide GTAA for Gypsies Travellers AND Travelling Showpeople with the intention of including the findings in the London Plan. Mayor Johnson when he took over omitted the findings even though they had been through a full Examination in Public.

The Guild would welcome Mayor Khan's approach apart from the fact that there is no mention of Showpeople whatsoever. Why is this? Showpeople sites are described as Plots and not pitches as they are larger needing space for the fairground vehicles. Travellers and Showpeople do not share sites for practical reasons; showpeople move vehicles in and out regularly and the family and community traditions are very different as indeed they are amongst different traveller groups who are not one homogeneous "lump". The current Government Guidance still includes a separate definition for Showpeople that whilst needing tidying up at least requires they are done. Separately!

Can you please correct this at once? We would want to see positive policies for showpeople in the draft NOW so we can comment and support. We do not want to waste this precious period banging on about this omission.

If you do not then it is certain that local authorities commissioning GTAAs may well either ignore showpeople completely or include them in an overall.traveller count and this would give no useful data at all.

I attach the previous GTAA from 9 years ago and await an explanation as to.why this long standing London community, many of whom are at present for the Capital's great festivals in Hyde Park Clapham Common and Crystal Palace, have been erased from your plan.

User: Community Law Partnership solicitors

The Travellers Advice Team at Community Law Partnership (CLP) advises and represents Gypsies and Travellers throughout England and Wales and has dealt with (and continues to deal with) many cases in London. We are just responding here to the piece in the draft London Plan on Gypsies and Travellers: https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/draft-new-london-plan/chapter-4-housing/policy-h16-gypsy-and-traveller-accomodation

Due to the virtual impossibility of finding stopping places in London, the vast majority of those Gypsies and Travellers in London who require pitches have been forced, for the time being, into housing. The dire situation has been greatly exacerbated by the discriminatory and prejudicial new definition of Traveller contained in ‘Planning policy for traveller sites’ (2015). In this context, we fully support and welcome the proposals contained in this section and, above all, the proposed definition of Gypsy/Traveller.

Our only criticism relates to 14.8.9 where we would point out that all existing pitches are protected by the Mobile Homes Act 1983 and pitches should only be ‘re-located’ or ‘re-provided’ if the Gypsy and Traveller residents voluntarily agree to this. Aside from that, we look forward to this section being brought into force as soon as possible.

CLP 26 February 2018

User:	Mr Ray Smith
see attachment	

User:	Trust for London

We welcome the inclusion of this section, as a long-term supporter of London Gypsies & Travellers. We would ask whether the Mayor should include an element of accountability here, to ensure that Boroughs follow through on this policy. Over the eight years of the last London Plan, fewer than 10 new pitches were provided across all of London, despite the identified need for more than 800.

User:	London Forum of Amenity and Civic Societies
Paragraph 4.16.2 third bullet point should be changed at the end to ‘, women and single parents.’	

User: Tracie Giles

Policy H16 Gypsy and Traveller Accommodation

I am a Romany Gypsy who lives on Newham's official Gypsy and Traveller site. I have lived there since I was 11 years old, for 34 years. My family have lived in the borough on the official site since 1971 when it was opened. My grandmother campaigned for Newham to build their site after the 1968 Caravan sites Act was introduced. Our site consists of 15 pitches and houses 5 generations of one extended family. Due to family growth there is a great need for new pitches. We have families doubling on pitches because they've got nowhere to go. Parkway Crescent was relocated in 2007 for the 2012 Olympic Games. Previous to Parkway we lived on Clay's Lane which was compulsory purchased for the Athletes' Village.

In the next 25 years I'd like new sites to be built on par with was done after the 1968 Caravan Sites Act. During the 1970s and 1980s there was an increase in Gypsy and Traveller council run sites in London, but after the duty was removed some sites were closed down and very little has been done.

We welcome the Mayor's new definition of Gypsies and Travellers. Newham was the first council in London to use the government's planning definition and came out with zero need. There is an internal need on our site of around 30 new pitches from young people and overcrowding. Our site is in an area of regeneration and we are so close to the boundary of the LLDC. The council not recognising the need can have an impact in the future of how well the site is protected.

Leaving it to councils to meet Gypsy and Traveller needs has not worked and will not work in the future because it's not a duty, so there is no incentive or sanction for them not delivering. There's a lot of pressure on councils to build more housing and that comes from the targets in the London Plan. The London Plan should also set targets for new pitches to show that this is also a priority when councils are identifying land. The targets should be based on the mid-point figure of need in the 2008 London GTANA as a minimum to be achieved in the next 5 years. The Mayor should then commission a new London wide needs assessment in line with the general housing evidence. Councils and the GLA should include new pitches in general housing development so that housing associations and developers can contribute to site delivery.

I would like to attend the Examination in Public hearings on the London Plan to discuss this policy in more detail and give evidence.

User: London Assembly Green Party Group

I welcome the clarification of the definition of Gypsies and Travellers set out in policy H16 B, and the addition in parts (2) and (3) of the following categories of need among those who are not currently travelling.

It has been argued in discussions I have attended with these groups that boroughs should assess need, but this is another area where boroughs may not be able to do this in a timely way. It also contrasts with other areas of the plan where strategic, London-wide issues have been assessed by the GLA and targets set for boroughs, such as for small sites.

I support the calls from campaigners for borough targets for new Gypsy and Traveller sites to be set by the Mayor as part of the London Plan.

User:	Alliance for Childhood

4.16.10 Where new pitches are proposed, the pitch and site layouts and the design of service blocks should be accessible and adaptable to ensure they are suitable for a range of users including disabled and older people, **children and young people** and families with young children.

User:	Inclusive Design and Access Panel

- H16 – 4.16.10, Support, very encouraging to see a requirement for accessible development.

User: Royal Borough of Kensington and Chelsea

4.14 Policy H16 Gypsy and Traveller accommodation

The Council welcomes that the Mayor is seeking to provide consistency for London boroughs on how to determine need and the requirement to undertake needs assessments in a timely manner. Further to this, consistency could be provided by setting out a standard London wide approach/ methodology to be followed for undertaking needs assessments. It may also be appropriate for the Mayor to define

groupings of London authorities who should work together under the Duty to Cooperate to establish need and make provision for this group of the community. This could significantly assist inner London boroughs which are tightly constrained and have extremely limited or no capacity for gypsy and traveller sites.

This borough is severely constrained with a uniquely dense built environment which limits the availability of sites. It is subject to heritage constraints with about 73% of the borough in a designated conservation area and about 4,000 listed buildings. It also has extremely high land values with median house prices the highest anywhere in the UK. Policy H16 does not acknowledge these circumstances.

The Council supports the requirement for an audit of pitches and sites. This should be coordinated and collated by the Mayor to establish where capacity may exist across London for traveller pitch provision and how it could address needs across London. However, as stated, the Mayor needs to recognise that this borough is severely constrained and may not be able fully address any issues that may be identified.

Policy H16: Gypsy and Traveller Accommodation sets out the Mayors definition of "Gypsies and Travellers" that boroughs should use when assessing needs. This differs to the Government’s Planning Policy for Traveller Sites. This is likely to result in a range of needs figures being established as boroughs will need to comply with both the Government and the Mayor’s definition. The different definitions have the potential to cause issues at a borough level in respect of consistency with national policy.

The policy refers to Table 3 of the GLA Gypsy and Traveller Accommodation Topic Paper 2017. However, the needs figures are based on evidence over 10 years old. Given the London wide variations in undertaking such assessments the Mayor should have addressed traveller needs on a strategic London wide basis by undertaking an 17

updated assessment. This could then be used as the basis of needs for those boroughs who have not undertaken a needs assessment since 2008.

User: London Borough of Islington

Draft London Plan Policy

Policy H16 Gypsy and Traveller accommodation

Islington Response

Policy H16 introduces a new definition of gypsies and travellers, which includes those who live in bricks and mortar accommodation (unlike the Government definition). Islington's need is entirely from bricks and mortar families, with no existing sites. The approach in the London Plan requires boroughs to undertake a new assessment as part of the Local Plan review, but in the interim to use a figure derived from the previous London-wide assessment from 2008; Islington's figure is 2 pitches. Islington's current approach is to allocate a site where defined need becomes evident, which based on the draft London Plan we now have. However, using the Government's definition would mean Islington may not have any need currently, although there would still be an emphasis on us to do an updated assessment. Using the new GLA definition may mean that Islington have to identify pitches, despite having no existing sites. Given the significant constraints on land in the borough there is an argument that delivery may not be available; in addition, need may not be sufficient to create a realistically viable site in terms of scale and also quality. We would suggest that the policy approach for boroughs with no existing sites, low levels of identified need and where significant land constraints exist should be identified by the policy and alternative approaches considered.

User:	London Borough of Barnet

The DLP requires the use of a new definition for gypsies and travellers due to concerns that the existing Government planning definition fails to recognise those who have ceased to travel or live in (bricks and mortar) housing. Clearly this approach remains to be tested and we would question the robustness of GLA's justification for deciding to depart from national definition of travellers and particularly whether such an approach is likely to be supported by Government. Barnet has jointly commissioned ORS to produce a West London assessment for gypsies and travellers' accommodation needs (GTANA). Initial findings from the West London GTANA highlight that the levels of need required under the London Plan definition significantly exceed the levels of need under the Government planning definition. Note that this currently excludes any assessment of need from households living in bricks and mortar which is likely to increase the levels of need by some margin. According to our consultants it is estimated that it costs approximately £100k to put in place a new pubic pitch and in the region of £5m per hectare for land purchase in West London. Therefore the financial implications are huge if the London Plan definition were to be adopted.

User: London Gypsies & Travellers

In the following section we propose suggested changes (in bold), with a justification and further evidence presented below each point.

Introduce a new table

Table x.x. Cumulative need for residential pitches from London Boroughs' Gypsy and Traveller Accommodation Needs Assessment March 2008, with midpoint need figure 2007-2017. (From the GLA 2017 Gypsy and Traveller Accommodation Topic Paper)

A. Table x.x sets the baseline figure of need at the start of this plan period. Boroughs must include these as targets for net completions in their Development Plan documents. Targets should be frontloaded for the first 5 year period and reviewed in light of the updated GTANA to set targets for the next 10 years.

The strategic approach of setting targets for each Borough for new housing completions has been relatively successful over successive iterations of the London Plan. This approach has enabled Boroughs to plan accordingly and prioritise the allocation of land for residential uses, as well as allowing public monitoring and scrutiny of overall delivery. The first iteration of the Draft Replacement London Plan 2009 had taken a similar approach to setting targets for Gypsy and Traveller site provision, based on the evidence study 2008 London Gypsy and Traveller Accommodation Needs Assessment commissioned by the GLA. At that time the policy was welcomed by the community and voluntary sector as a fair and equitable approach that would ensure delivery. Unfortunately over the following rounds of alterations these targets were removed and the London Plan reverted to a discriminatory approach of delegating target allocations to Local Plans in line with the national guidance Planning Policy for Traveller Sites.

Our research monitoring the implementation of the PPTS demonstrates that this approach has been highly ineffective and has contributed to the further exclusion of Gypsy and Traveller needs from plan making process across a large number of London Boroughs. We therefore argue for the introduction of minimum targets based on the 2008 London GTANA mid-point figure. While this is actually backlog need, as it should have been met between 2007-2017,for the purpose of speedy delivery, we support this as a baseline target for the next 5 years.

B. The Mayor will work with Boroughs and GT communities to undertake a London wide GTANA within the first 5 years of this plan, to form the basis of targets for years 6-15. This will be based on the definition below in Point E.

The 2008 London GTANA was the first and only GLA commissioned study on the needs of Gypsy and Traveller communities, and despite some of its shortcomings, it is still to date the most comprehensive source of evidence. Since the adoption of the PPTS only a third of Boroughs have commissioned their own GTANA. We do not consider the approach suggested currently in the Draft London Plan to be sufficient to ensure the full assessment of the accommodation needs of the community. While there is a London wide housing needs assessment which includes elements of specialist housing need (the Strategic Housing Market Assessment commissioned by the GLA), there is no similar study for Gypsies and Travellers. This differential treatment is not sustainable over the longer term as it will reinforce the exclusion and delays of assessing accommodation needs for Gypsies and Travellers in local plan-making. A London wide GTANA commissioned by the GLA but conducted in close collaboration with local authorities and Gypsy and Traveller communities and support organisations would ensure a consistent and fair approach, benefitting more equitably Gypsies and Travellers across the whole city.

C. To ensure the first 5 year targets are met Boroughs must prepare delivery focused DPDs which
a) allocate a sufficient range and number of sites
b) encourage development on other appropriate windfall sites not identified in Development Plans through the Plan period
c) enable the delivery of new pitches in Opportunity Areas and Housing Zones, working closely with the GLA.
d) enable the inclusion of pitches as part of larger residential/mixed use development schemes

D. To ensure targets for years 6-15 are met Boroughs must publish and annually update a 5-year supply of land which identifies the sources of site capacity (including windfall) expected to contribute towards achieving pitch targets and should work with the Mayor to resolve any anticipated shortfalls.

Identifying land for Traveller sites is one of the biggest barriers to delivery1. The requirements in Policy H1 Increasing housing supply need to apply to Gypsy and Traveller site accommodation as well.

Gypsy and Traveller community members have extensive knowledge of available local land that would be suitable for caravan sites, though they don’t always have access to other information

such as land ownership, technical specifications etc. Many of the local authority Traveller sites that
we have in London today, for example in Southwark, Hackney, Tower Hamlets, Camden, have started off as unofficial camps and became recognised and developed through the campaigning efforts of Gypsies and Travellers and support organisations. Other more recent examples include the Crossrail relocation of the Eleanor Street Travellers' site in Tower Hamlets, voluntary work undertaken by a local Traveller activist in Camden to identify land for a new site and the Bartrip Street site allocated in the LLDC Local Plan as a result of Traveller community submissions to the Hackney Site Allocations Local Plan.

In implementing this policy the GLA could support by:

- resourcing site searches by local Gypsies and Travellers;
- creating an accessible register of land identified by community members and supporting technical appraisal and constraint mitigation processes that are participatory and transparent;
- facilitating relationships between local Gypsy and Traveller communities, support organisations, local authorities, delivery partners and other agencies to make tangible progress on the delivery of new sites.

E. We support the new planning definition of Gypsies and Travellers introduced in the Draft London Plan.

We welcome the definition which includes all Gypsies and Travellers living and working in London, which reflects on of the strongest demands in the London Gypsy and Traveller Forum 2016 Manifesto. This broader definition is entirely appropriate in response to the evidence presented in the GLA 2017 Gypsy and Traveller Accommodation Topic Paper.Since 2014 we have campaigned alongside members of the Gypsy and Traveller community firstly to oppose the change to definition introduced by national government, and subsequently to monitor the impacts of this change on the community. The definition of Gypsies and Travellers introduced in the Draft Local Plan is lawful because

a. Romani Gypsies and Irish Travellers are protected as separate ethnic minorities by the Equality Act 2010.
b. Gypsies and Travellers are among the most disadvantaged ethnic minorities in England and Wales.
c. Central to their culture and ethnicity is living in caravans and mobile homes, on settled sites as well pursuant to a nomadic way of life.
d. Gypsies and Travellers who do follow a nomadic way of life experience racism and discrimination, a lack of safe places to stop, and difficulties accessing services such as education and healthcare. The pursuit of a nomadic way of life is difficult even for young and able-bodied Gypsies and Travellers but it is particularly challenging for Gypsy and Traveller families with children or elderly, infirm, or disabled members.
e. PPTS as issued in August 2015 removed the words “or permanently” from this definition [158]. As a result, Gypsies and Travellers who have become too old or too ill to travel, or who have stopped travelling to help their children get an education, have been stripped of their ethnicity for planning purposes.
f. This is unjustified and unlawful indirect discrimination on grounds of age and disability and a
breach of Article 8 and Article 14 of the European Convention on Human Rights (ECHR). In addition, the new planning definition used by H16 is consistent with taking steps to advance equality of opportunity required pursuant to the public sector equality duty.

Some of the expected impacts include: increase in unauthorised encampments with repercussions for families and children; increasing lack of maintenance and management of council sites and increasing threats from regeneration projects; insecurity for Gypsies and Travellers living on their own private sites as more difficult to get planning permission. In London, the introduction of the government’s definition has resulted in many GTANAs identifying zero need for the next 15 years, which is inadequate in light of historic under-provision, current levels of overcrowding and future family formation.

We believe the London Plan definition is justified.

F. Boroughs should undertake an audit of existing pitches and sites, identifying:
1) areas of overcrowding
2) areas of potential extra capacity within existing sites
3) pitches in need of refurbishment.
Boroughs should plan to address issues identified in the audits.

Introduce new requirements:
Audits must be undertaken in close collaboration with site residents.

The Mayor should produce guidance for undertaking audits in close collaboration with GT communities and support organisations.

The Mayor should also produce new site design guidance, building on the 2007 DCLG Site Design guidance, best practices from London and other UK regions, in close collaboration with GT communities and support organisations to develop innovative and high quality solutions.

From our experience working with Gypsy and Traveller site residents groups and supporting them in liaising with their councils on issues related to repairs and maintenance, we recommend that audits should be commissioned and conducted in close collaboration with community members. This would ensure that all the relevant issues are included, that the study is done in an open and transparent way and that funds are saved by tapping into the knowledge and expertise of the residents. We are keen to work with the GLA over the coming months to facilitate a collaborative process for developing guidance for local authorities. We believe this is also a key opportunity to build on the specialist knowledge of community members, support organisations, academics and other interested stakeholders in revising design guidelines for Gypsy and Traveller sites. These should reflect the high standards that are proposed throughout the London Plan particularly in the Design chapter.

G Boroughs should actively plan to protect existing Gypsy and Traveller accommodation capacity, and this should be taken into account when considering new residential developments to ensure inclusive, balanced and cohesive communities are created. **The GLA and boroughs must prioritise the safeguarding of existing sites. No replacement should be allowed without securing like for like accommodation in the same neighbourhood.**

From our experience monitoring the loss of council sites across London, but also supporting residents groups through the Olympic and Crossrail relocation processes, there are very high risks of losing existing provision without the very close involvement of site residents and support organisations. The identification and delivery of a replacement site prior to redevelopment is essential to ensure no net loss of existing stock, as highlighted in the case of Lewisham, where over 8 years have passed since the council site was closed and no replacement has been secured yet.

H. The Mayor will work with Boroughs, Gypsy and Traveller communities, support organisations and other stakeholders to develop a negotiated stopping model at local and sub-regional level in response to unauthorised encampments and to facilitate a nomadic way of life. This will involve where necessary the identification of suitable land for temporary stopping places and the facilitation of cross-borough and cross-agency work.

In developing approaches to addressing unauthorised encampments that seek to reduce the negative social impacts on Gypsy and Traveller communities, community tension, and costs to local authorities and the police, we recommend the implementation of the negotiated stopping model2, which requires London wide coordination and close working with Boroughs, Gypsy and Traveller communities and other stakeholders. This has been previously put forward to the Mayor as a recommendation from the London Assembly Housing Committee in 20153. While this entails many elements that are beyond the scope of the London Plan, it is essential for the policy to include mentions of temporary accommodation which is culturally suitable for Gypsies and Travellers in order to facilitate their nomadic way of life.

Other general points:

The differential approach between the general housing policies and H16 is discriminatory and will continue to reinforce the inequalities facing Gypsies and Travellers in terms of accessing culturally suitable accommodation that meets their needs. This is closely linked to negative impacts in terms of access to education, health and other facilities, family life, cultural identity and heritage. The suggested changes seek to address this deficiency and ensure a fair and similar treatment to ensure delivery.

The KPIs and Annual Monitoring Report should monitor the net delivery of new pitches against set targets.

The SHLAA is deficient as it does not identify capacity for Gypsy and Traveller accommodation. If this is essential for housing delivery, the same treatment should apply to Gypsy and Traveller accommodation.

The IIA is deficient as it does not assess the risks and adverse impacts of continuing to delegate delivery to local authorities, and not having a consistent approach with housing evidence and policy approach (e.g. SHMA and SHLAA etc)

The Plan is deficient as it does not cover the accommodation needs of Travelling Showpeople and Bargee Travellers (Boat dwellers) – this should be rectified through the introduction of new policies in close collaboration with representatives from these communities.

User: London Gypsies & Travellers

The London Gypsy and Traveller Forum aims to improve the lives of Gypsies and Travellers in London, particularly in relation to their accommodation needs; and to promote their rights as Londoners, to equal treatment. It does this through exchange of information, discussion, promotion of good practice, challenge of poor practice, and advice to the GLA, the London Mayor and all other London authorities.

The Forum is open to London Gypsies and Travellers, organisations representing them, council officers, elected representatives, service providers and other interested individuals and organisations who live or work in London, and who support and are prepared to work towards the above aim. The Forum was established in September 2004 and meets on a quarterly basis at the City Hall when possible.

The Forum's response to the Draft London Plan is based on the discussion we had at the meeting held on 13th February 2018 at City Hall.
There is support for the new definition of Gypsies and Travellers in the London Plan, however there were concerns expressed regarding how this will be taken up in Local Plans.

Policy H16 was considered to go in the right direction, but not strong enough to ensure the actual delivery of new sites. Many participants, particularly members of the Gypsy and Traveller community expressed disappointment at the lack of ambition of the policy. The disparity between the general housing policies and the Gypsy and Traveller accommodation policy was also noted – in terms of the evidence base, approach to delivery and monitoring.

In the Strategic Housing Land Availability Assessment land is earmarked for 65000 new homes, but this does not include land for Gypsy and Traveller sites. Councils are under pressure to build all the new housing, which leaves very little available land for any new pitches. Members of the Gypsy and Traveller community across London gave examples of how no land has been identified in their local authority development plans, despite this being required by national planning policy. Community members have repeatedly made suggestions and submitted site proposals to their local councils but this has not resulted in any real change. The London Plan should require councils to identify land and have a rolling 5-year supply of land updated annually, in line with the general housing requirements.

Using the 2008 GTANA figures as a ten year identified need is not necessarily the best approach, as some councils had identified a very low figure. However, the 2008 GTANA mid-point is a reasonable indication of backlog need and should be used as a target in the London Plan for speedy delivery over the next 5 years. The GLA should commission a new London wide study in line with the housing evidence base within the next 5 years to have an up to date assessment of need.

Given the failure of successive governments to adequately address the needs and human rights of Gypsies and Travellers, this London Plan should be driven by delivery. A comparable approach to housing delivery should be taken in the London Plan – through securing new pitches in larger residential schemes, supporting housing associations, charities and developers to make provision for Gypsies and Travellers, so they are not pushed onto the worst pieces of land which are left over from plan making that is driven by housing.
There should be ways for the Mayor to hold local councils to account if they do not deliver on their targets and identified need. New pitch delivery should be included as a Key Performance Indicator in the Monitoring chapter.

There are cases of very significant local opposition to Gypsy and Traveller site delivery – for example in Lewisham there were two petitions signed by hundreds of people to oppose the allocation of land for three new pitches. The Mayor should send a message through the London Plan that discrimination against this community is not acceptable.

There are concerns about the Affordable Homes Fund as this is a limited amount of money and councils and registered providers will apply only for housing delivery if they are not actively supported to deliver Gypsy and Traveller sites.

The London Plan should also support the provision of private sites. Although these are less common in London, there are a few Boroughs where community members have been able to buy low cost land in the Green Belt. The Plan should allow for some flexibility on Green Belt land where councils are unable to identify other suitable locations.

The London Plan is deficient as none of the policies address the accommodation needs of Travelling Showpeople and Bargee Travellers or houseboat dwellers.

The London Plan cover illustration – the map of London – should include caravan sites and boaters' communities in recognition that London's diversity needs to be inclusive of different types of accommodation.

User: London Gypsies & Travellers

I am Marian Mahoney, I'm an Irish Traveller and live on the Old Willow Close site in Tower Hamlets. I've been an activist for Travellers' rights for 40 years. I have travelled all over England and London and together with my family we always fought to have facilities and official designation after the 1968 Caravan Sites Act was introduced. We finally settled in Bow and got the site recognised and designated by the council and have been there for 36 years.

Our site was threatened by the Crossrail redevelopment and we had to fight for 10 years to keep our site. There are 19 pitches on the site and 3 generations live here, but no new sites have been in built in Tower Hamlets to house growing families and young people. The council knows how many kids there are on the site who need their own pitch, yet nothing has been done to meet this need.

We are hoping that the London Plan will ask every council to build at least 3-4 pitches every five years; we only need small sites, not big pieces of land. When other housing gets built they need to acknowledge Gypsies and Travellers who work and pay taxes in the area and treat them the same as everyone else, while recognising our ethnicity and way of life and the culturally suitable homes we need. There is money available for sites from the Mayor and shouldn't be so hard to build new sites if we were included with all the new housing that is getting built.

We have been discriminated and prejudiced for centuries. This affects our culture, education, families. Because there are not enough sites, we get pushed into housing, our families suffer from mental health, our old people are not being looked after because there is nowhere to live. We are Londoners and we want the same as everyone else. The Mayor and each borough should monitor that sites are getting delivered and that funding is being used. Under the previous Mayor money was sent back by councils because they said they can’t find any land.

We see the evidence of land becoming available to build supermarkets and other things, yet there is never anything for Travellers. It is very cruel what’s happening to us and it’s time to stop this. We need a fair Mayor who can ensure there will be delivery.

User: London Assembly Labour Group

Suggested Changes
G. Boroughs must set their own targets for pitches and sites based on their needs assessments.

These targets, set by the Boroughs, will form the basis of a KPI in this Plan which the GLA will monitor.

Justification for Recommendations

The London Plan provides targets for units in all other tenures, in accordance with the GLA's duty to equalities, the London Plan should also seek to gather targets for pitches and sites based on needs assessments.

Insufficient pitch provision can lead to a rise in unauthorised encampments, with implications for the health and wellbeing of Gypsies and Travellers, community cohesion and costs for boroughs.

A particular challenge is the fact that many local authorities take a blanket approach, not being able to separate between different types of encampments such as families with strong connections to an area and families passing through the borough.

In seeking to address this Boroughs must work to set their own targets for pitches and sites based on their needs assessments.

User:	Stonewall Housing

Stonewall Housing welcomes the London Plan’s directive that local authorities should undertake or update needs assessments for Gypsies and Travellers (**POLICY H16**), and we request that the London Plan should make similar directives for LGBT communities since our communities have very poor access to emergency accommodation, supported housing and sheltered accommodation.

User:	London Assembly Planning Committee

Recommendations The Assembly would like to see the policy include encouragement for boroughs to provide a single point of contact for Gypsies and Travellers. Provision of a single point of contact would facilitate dialogue between the Gypsy and Traveller community and the boroughs.
5.42 The Housing Committee carried out an investigation into Gypsy and Traveller site provision in London in 2014/15, where we heard that Gypsy and Traveller residents in those boroughs who had a single point of contact felt much more engaged.

User: London Borough of Lambeth

Lambeth objects strongly to the inclusion of a different definition of Gypsy and Traveller than that included in national Planning Policy for Traveller Sites (PPTS). Under section 41 of the GLA Act 1999, the London Plan must have regard to the need to ensure that the strategy is consistent with national policies. Draft London Plan policy H16 is not consistent with national policy. The proposed new definition refers to “people with a cultural tradition of nomadism, or living in a caravan, whatever their race or origin” (emphasis added). This encompasses anyone who, by choice or not, is living in a static caravan, irrespective of their cultural identity and association or not with the Gypsy and Traveller community; and it assumes that this person therefore automatically wishes to continue to do so, requiring LPAs to plan accordingly. This would include people who are living in caravans because they cannot find conventional affordable housing elsewhere, given the high level of unmet conventional housing need. This is not an effective way to plan to meet housing need, particularly given the priority in every other part of the Plan to intensification of the use of land, optimising residential densities, maximising provision of affordable housing and the quality of housing.

PPTS rightly gives priority to “persons of nomadic habit of life whatever their race or origin” (emphasis added), and rightly includes those who have ceased to travel temporarily. However, the proposed new London Plan definition goes further to include within the definition of Gypsy and Traveller those who have ceased to travel permanently. The priority for Traveller pitches in a city with very scarce land resources should be given to those who genuinely lead a nomadic life or genuinely would do so if they could. This is a much smaller group of people than that encompassed by the proposed new London Plan definition, and is an appropriate basis for planning to meet this specialist form of housing need.

User:	London Borough of Haringey

The Council is concerned that the draft Plan’s definition of Gypsies and Travellers goes beyond Government policy and the reasons for doing so (paragraph 4.16.2) do not appear to be supported or justified by evidence. The onus is on the Mayor to demonstrate why the definition should depart from that of Government policy.

User:	London Borough of Barking & Dagenham

The Council understands why the Mayor of London has adopted a more inclusive definition for Gypsies and Travellers. However, an impact assessment should be undertaken to understand the implications of operating one definition for London and another for the rest of the country. In addition, London Boroughs will need substantial funding from the Mayor to enable them to address the special housing needs of Gypsies and Travellers.

User:	London Borough of Brent

The Borough supports the policy. It understands that the definition of Gypsies and Travellers is wider than Government's in terms of planning to meet needs. As such early clarification following representations received from MHCLG of which methodology for meeting needs should be used for planning purposes would be appreciated to allow certainty of numbers for the purposes of site identification.

User: London Borough of Bromley

The Council objects to the London specific definition of Gypsies and Travellers which will artificially increase the need within London compared to neighbouring authorities outside London. By addressing this higher need the effect will be to overprovide traveller pitches within London's boundaries relative to the surrounding area. Given the land intensive nature of traveller pitches relative to other forms of residential development this relative overprovision would be contrary to the sustainable use of land and detrimental to the requirements of the London Plan to deliver housing targets.

The Bromley Traveller Accommodation Assessment (2016) was prepared to support the draft Local Plan (currently at examination), in line with "Gypsy and Traveller Accommodation Needs Assessments Guidance (2007)" and the Governments Planning definition of Gypsies and Travellers.

Subject to the findings of the Inspector sets targets for Bromley over the next 10 years which can be accommodated from within the proposed Local Plan allocations. The Council objects, as it did in 2009, to the proposed 'fall back' targets for Boroughs who have not undertaken an assessment are set within the GLA Gypsy and Traveller Accommodation Topic Paper 2017. The targets based on the 2008 GTANA and are skewed by a formulaic approach to psychological aversion which does not reflect the need experienced through Council waiting lists. The 'mid point approach', which was considered, subsequently reduced and ultimately rejected altogether in the development of the London Plan 2010, produces artificially high targets.

User: London Councils

The majority of London’s boroughs are already planning to meet the identified need for permanent gypsy and traveller pitches in line with national policy. There are concerns that the prescriptive policy set out is not consistent with national requirements. The definition set out in the London Plan includes ‘those who have ceased to travel permanently’ and ‘those who have a cultural preference not to live in bricks and mortar accommodation’

The inclusion of ‘those who have ceased to travel permanently’ in the GLA definition of Gypsy and Travellers is contradicts the national definition provided in the Planning Policy for Traveller Sites which was amended in 2015 to exclude this group.

The inclusion ‘those who have a cultural preference not to live in bricks and mortar accommodation’ is of concern. ‘Preference' is not currently considered to be an aspect of housing need for any group in national policy, and its inclusion could have far-reaching implications for boroughs. There are many other groups, including other groups who have protected characteristics in terms of the Equality Act 2010, who would have some justification for claiming a preference for a particular housing type.

The London Plan's proposed definition would be likely to lead to a significant increase in the assessed need for pitches. The effect of the definition would be that any individual or household could state a cultural preference not to live in bricks and mortar accommodation, and boroughs would need to plan to meet that preference. This would create expectations that simply cannot be met in terms of site availability and cost for boroughs. The Mayor's estimate that there are 30,000 gypsies and travellers in London contrasts markedly with the 2011 Census count of 8,196 usual residents who identified as gypsies or Irish travellers.

London Councils believes that the GLA should collaborate with boroughs to carry out a new pan-London assessment of pitch needs on the basis of the national definition of gypsies and travellers. The Mayor can also provide guidance on how needs can be met on a pan-London basis. This could include making suitable GLA land available for pitches and providing grant to boroughs to make land available where required.

User:	London Borough of Tower Hamlets

We are supportive of this policy and consider it extremely positive that Mayor of London acknowledges wider housing requirements of gypsy and travellers.

However given the difficulties many (in particular inner and central) London boroughs have in finding suitable locations for additional sites and pitches (which will be exacerbated by the new London Plan land intensification approach), it is considered that the London plan should play a role in identifying suitable locations to meet London’s needs (with a recognition of the preference to maintain local links).

User:	London Borough of Merton

Object – not consistent with national policy. This policy is not consistent with national policy and as such is not sound. The discretion should remain with Local Authorities to determine based on their local evidence whether or not to depart from Government Guidance on the definition of Gypsies and Travellers, where they consider this can be robustly justified and evidenced. The evidence used in the GLA research paper dates from c10 years ago, in some cases longer. No other policy attempts to justify a departure from national policy on out-of-date evidence.

User: Royal Borough of Kingston

Support the proposed definition for Gypsies and Travellers. Councils should assess the needs for pitches from all members of the community - not just those who currently lead a nomadic lifestyle.

Given the strategic, cross-boundary nature of this issues affecting the Gypsy and Traveller community, it is disappointing that the GLA has not undertaken a GTANA, in a London-wide manner, to ensure consistency across the city.

While the policy sets out a solid basis for assessing needs, it does not make clear how Councils should meet those needs. RBK has one public site that has recently been redeveloped to increase the capacity of the site to 18 pitches. It is not capable of being extended further. All of the other current private sites (either authorised or unauthorised), lie within the Green Belt and realistically, it is only Green Belt/MOL that could provide further land for pitches to meet assessed needs. However, the Mayor has made it very clear in policy G2 that any harm to the Green Belt should be avoided and that any alteration of the Green Belt boundary would not be supported. For this reason, further guidance is sought regarding how the needs of the Gypsy and Traveller community can be met, consistent with other policies in the plan.

User:	London Borough of Hillingdon

The proposed change in the definition of Gypsy and Traveller Groups, as set
out in draft policy H16 differs significantly from that contained in the DCLG Guidance
document: Planning policy for traveller sites. There is no justification for a departure from national planning guidance on this matter and the DCLG definition should be retained in the policy.

User:	London Borough of Hounslow

LB Hounslow strongly support the clarification provided by policies H13, 14, 15, 16, 17 and H18 on other tenure types. However, consideration should be given to ensuring that policy H13 is well regulated so as to ensure they do not provide exploitative and result in poor quality accommodation and its implications on community cohesion and place making.

LB Hounslow supports this policy see above

User: London Borough of Hackney

Support the re-introduction of a bespoke Gypsy and Traveller policy in the new London Plan.

Need in itself does not translate into pitch targets, and targets for boroughs does not appear to have been set in either the new London Plan or Topic Paper 17. This is in direct contrast to tables 4.1 and 4.4 of the new London Plan which sets targets for general housing and specialist older person housing by borough.

H16 represents an opportunity for the London Plan to take a strategic lead on a Londonwide needs assessment, setting individual or sub regional targets for boroughs and clearer routes / assistance to delivery on an issue which many boroughs have struggled to effectively address. As section 4 of Topic Paper 17 highlights since 2008 10 new pitches - spread between three London boroughs - have been delivered, while the need between 2007 and 2017 is a minimum of 231 and a maximum of 701 residential pitches (Table 2 summary of need for residential pitches 2007-2017).

User:	Westminster City Council
We question whether the Mayor should be seeking to overlie national planning policy and guidance on this issue.	

User: Maidstone Borough Council

Policy H16 of the draft Plan proposes a different definition of Gypsies & Travellers for the purposes of planning within London, more expansive than that set out in Planning for Traveller Sites (PTS) to include those who have permanently ceased to travel. This is due to concerns that the Government's definition of Gypsies and Travellers fails to recognise the needs of many ethnic Gypsies and Travellers, namely those who have ceased to travel permanently, those who live in bricks and mortar and those who are no longer travelling because of education, heath or old age. The Plan states that results in Gypsies and Travellers not being counted in needs assessments.

The Council supports that Policy H16 directs that the London boroughs to plan to meet the need for permanent pitches in full but the council also notes that this different basis for assessing needs likely to be challenged if approaches are made under Duty to Co-operate to authorities outside London to accommodate unmet need.

User:	Chelmsford City Council

At paragraph 4.16.2 of the Plan, it is noted that the Mayor has adopted a new definition of Gypsies and Travellers which is different to the Government. It is questioned whether all the London Boroughs have agreed to this new definition and whether they are obliged to adopt it when assessing need for Gypsy and Traveller accommodation.

Paragraph 4.16.7 of the Plan states that Boroughs should actively plan for Gypsies and Travellers' accommodation needs. The Plan does not clarify the position if need cannot be met and what steps should be taken by Boroughs to address unmet need.

User: London Borough of Redbridge

The Council notes the Mayor's new definition for Gypsies and Travellers in policy H16. Whilst this new definition goes further than the government's definition in relation to not recognising many Gypsies and Travellers, it will be important that government endorse this definition. This change in policy has the potential to cause soundness issues for boroughs when developing their plans and being in conformity with the London Plan on the definition but not in line with government guidance.

The policy provides a transitional type arrangement for how boroughs should now properly assess the needs for Gypsies and Travellers and undertake a needs assessment. The Redbridge Local Plan is supported by an up-to-date Gypsies and Travellers Needs Assessment (2016) that overall illustrated a slight increase in the number of pitches required over the next 15 years. It concluded that the identified need could be met on the existing site in the borough. CLG needs to endorse this definition.

The policy needs to go further and reflect that typically most gypsy and traveller sites are quite often in outer London and on the green belt. As such "exceptional circumstances" will need to exist for land to be released from the green belt in order to meet the need for Gypsies and Travellers. Some flexibility within the policy in relation to green belt is required. Fixed wording that alteration to the green belt as set out in policy G2 isn't supported and as a result will impact on the ability for outer London boroughs to find additional sites to meet the needs for Gypsies and Travellers.

Further to the issue about need and capacity, one of the really difficult issues is around inclusion. Local experience as well as expressed views suggests that various groups generically identified as travellers (i.e. English gypsies, Irish travellers and Roma gypsies) experience tensions when on the same sites. This suggests a difficulty in achieving a "wider inclusive neighbourhood" and more research around this is welcomed.

User:	London Borough of Enfield
Policy H16 focuses on ‘Gypsies and Travellers’ and should refer to ‘Travelling Showpeople’. Also, Mayoral Development Corporations should also identify sites for Gypsy and Traveller pitch need.	

User:	London Borough of Wandsworth

There is no rationale for the London Plan adopting a new definition, different to the national definition, particularly as the Plan leaves the boroughs to undertake local assessments.

Without new burdens funding to carry out a review of the Councils Gypsy and Traveller needs assessment, there will not be the capacity to undertake this level of newly defined extensive assessment. The change in definition will require far more intensive work to assess.

User:	London Borough of Richmond Upon Thames

There is no rationale for the London Plan adopting a new definition, different to the national definition, particularly as the Plan leaves to boroughs to undertake local assessments. The change in the Government definition was on the basis that it is fair that if someone has given up travelling permanently then applications for planning permission should be considered as they are for the settled community. This is particularly important in London given land constraints.

Without new burdens funding to carry out a review of the Councils Gypsy and Traveller needs assessment, there will not be the capacity to undertake this level of newly defined extensive assessment. The change in definition will require far more intensive work to assess.

User:	London Borough of Harrow

The Council is concerned that the draft Plan’s definition of Gypsies and Travellers goes beyond Government policy and the reasons for doing so (paragraph 4.16.2) do not appear to be backed-up by evidence. The onus is on the Mayor to demonstrate why the definition should go beyond that of Government policy.

User:	Royal Borough of Greenwich

Concerned that the implications of a London-specific definition of gypsies and travellers which contradicts the Planning Policy for Traveller Sites (PPTS) has not been properly assessed. Local authorities must produce local plans that are in line with both national and regional policy, which would be impossible when the two definitions are contradictory. Furthermore, this would also make carrying out a gypsy and traveller needs assessment very difficult as these two definitions would require different methodologies and are likely to lead to different levels of need. A more strategic approach to gypsy and traveller accommodation is needed across London.

User:	London Borough of Havering

Havering strongly considers that boroughs should be able to identify targets for gypsies and travellers based on up to date assessments and in line with the **current** Government planning policy.

The proposed policy will introduce artificially high ‘need’ within London relative to neighbouring districts outside London.

User: Just Space

H16 Gypsies and Travellers

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

a) allocate a sufficient range and number of sites

b) encourage development on other appropriate windfall sites not identified in Development Plans through the Plan period

c) enable the delivery of new pitches in Opportunity

Areas and Housing Zones, working closely with the GLA.

d) enable the inclusion of pitches as part of larger residential/mixed use development schemes

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

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

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

User: Mobile Homes Sales and Management

H16

1. Boroughs should plan to meet the identified need for permanent Gypsy and Traveller pitches.

Mobile Homes Sales and Management Ltd (MHSM) in collaboration with Continental Holiday Homes, are a national mobile home provider; and site acquisition and management company. MHSM are committed to providing decent and suitable mobile home accommodation for Gypsies and Travellers; and those traditionally settled communities that are seeking a mobile home solution to their accommodation needs. MHSM have tenants in more than half of all local authorities in England, Scotland and Wales. This national portfolio helps inform a wide perspective on Gypsy and Traveller sited provision across the UK.

This London Plan comes at a time of crisis in Housing, with rapidly increasing homelessness, and a changing London demographic that is an increase of the young and old. This context presents significant challenges to the Plan. A review of homelessness by the national charity Shelter (Nov 2017) is verified unmistakable evidence that the accommodation crisis is mounting. The study reveals that more than 300,000 people in Britain are now homeless, this is 1 in every 200 people across the UK. This is particularly acute for Greater London as this is shown as the worse affected area. The 10 local authorities with the highest rates of homelessness and 18 of the top 20 are all within the capital.

For most of the last decade London’s population has continued to grow at above 1% of the national average. With an increasing population, the demand for homes and land to build them on is great. In the Strategic Housing Land Availability Assessment, land is earmarked for 65,000 new homes, but this does not include land for Gypsy and Traveller sites. Councils are under pressure to build the new housing, which leaves a limited supply of land for any new Gypsy and Traveller pitches. The London Plan must require councils to identify land and incorporate a rolling 5-year supply of land updated annually, in line with the Governments general housing requirements.

MHSM are strong supporters of Policy H16 as a significant step in the right direction, although identifying that to meet the needs of Gypsies and Travellers it must go further. MHSM would strongly recommend the plan identifies and indicates how it will ensure the delivery of new sites for the growing population. It could be that it is useful to apply the same kind of rigour to Gypsy and Traveller accommodation, as is given to general housing policies: in terms of an evidence-based approach to delivery and monitoring. The Plan should make explicit how it will monitor the progress of London Boroughs in ensuring new decent suitable Gypsy and Traveller provision in London is delivered.

Historically, even when funding is available, London Boroughs have failed to implement policy and deliver new site provision. A report by London Gypsies and Travellers (2016) into research of London Boroughs implementation of PPTS concluded: ‘that whilst this could have seen a steep change in meeting Travellers’ accommodation needs, instead ‘in London the policy was effectively thwarted by Local Authorities who with few exceptions did not undertake collaborative work with Gypsy and Traveller organisations or with neighbouring Local Authorities, produced needs assessments that underestimated actual need and did not identify and allocate land for new Traveller sites.’

This experience is born out again and again in practice. Tactics employed by decision makers to stall the planning system meeting the needs of Gypsies and Travellers: such as separate Gypsy and Traveller Local Plans, that allow Core Strategies to go forward, whilst Gypsy and Traveller site provision may be handled alternatively. Following Fordhams (2008) London wide Needs Assessment; Kensington and Chelseas’ Core Strategy had a bold vision to meet the identified need. A decade on and despite numerous DPDs, Needs Assessments, Site searches, land identified for delivery and many tens of thousands of £’s of officer and legal costs: no additional site provision has been provided. This serves to frustrate a community that is constantly promised that their needs will be taken seriously by all parties. A story that is echoed across London. As demonstrated in the ‘London Gypsies and Travellers (2016)’ research, less than one third of London boroughs had undertaken a ‘Needs Assessment’ since 2012 despite a legal requirement to do so.

In London, meeting the Gypsy and Traveller Accommodation need, has in the past been perceived as the ‘Gypsy and Traveller issue’. Other areas of the country are taking very different approaches to delivering their Gypsy and Traveller site provision. In Buckinghamshire, for example, five of the Local Authority sites have been successfully privatised. In Leicester, there is a Mobile Home Park that has mixed communities of those traditionally ‘settled’ families and Traveller and Gypsy’ tenants. In Norfolk, Transit Provision is being turned into a permanent site: again, for mixed communities of ‘settled’ and ‘Gypsy and Traveller’ communities.

Given the failure of successive governments to adequately address the needs and human rights of Gypsies and Travellers, this London Plan should be driven by delivery. A comparable approach to housing delivery should be taken in the London Plan – through securing new pitches in larger residential schemes, supporting housing associations, charities and developers to make provision for Gypsies and Travellers, so they are not pushed onto the worst pieces of land which are left over from plan creations that are driven by housing.

MHSM would ask that the Plan make explicit the opportunity for London Councils to properly engage with the private sector to help deliver more provision. The private sector has a significant role to play in helping meet Housing Needs nationally and that should especially be encouraged in the London Plan for Gypsy and Traveller accommodation too as a corporative and cost consideration for Councils integrated with and affected by the London Plan.

At present private provision for the accommodation and sites of Gypsies and Travellers is less common in London, although there are Boroughs where community members have been able to purchase low cost land in the Green Belt for this facility. MHSM believe that the Plan should allow for some flexibility on Green Belt land where councils are unable to identify other suitable locations.

This plan has the potential reverse what has traditionally been perceived as an issue on its head and embrace more mobile provision for Gypsy and Travellers, whilst also addressing needs for traditionally settled communities that are seeking affordable or appropriate accommodation..

1. As of the start of this Plan period, boroughs should use the following definition of ‘Gypsies and Travellers’ as a basis for assessing need: People with a cultural tradition of nomadism, or living in a caravan, whatever their race or origin, including:

MHSM welcome the Mayors bold statement to challenge the governments poorly defined definition. However, the definition could perhaps be broadened to include Travelling Showpeople and Travelling Bargee.

1. those who are currently travelling or living in a caravan
2. those who currently live in bricks and mortar dwelling households whose existing accommodation is unsuitable for them by virtue of their cultural preference not to live in bricks and mortar accommodation
3. those who, on grounds of their own or their family’s or dependants’ educational or health needs or old age, have ceased to travel temporarily or permanently.

1. Boroughs that have not undertaken a needs assessment since 2008 should either:

MHSM might suggest that using the 2008 GTANA figures as a 10-year identified need is not necessarily the most efficient approach. This is because historically a percentage of councils had identified a very low figure of Gypsies and Travellers that has often been disputed and does not reflect up to date figures. However, the 2008 GTANA mid-point is a reasonable indication of backlog need and should be used as a target in the London Plan for speedy delivery over the next 5-years. The GLA could commission a new London wide study in line with the housing evidence base within the next 5-years to have an up to date assessment of need.

Whilst waiting for a London wide ‘Needs Assessments’ or other local delivered ‘Needs Assessments’ to update the Fordhams (2008) study, it could be considered a more sensible option for all the London Boroughs to start reviewing their existing Development Plan process; adopting the midpoint figure as an initial starting place. In this way conducting the ‘Needs Assessment’ will not in any way delay the delivery of new provisions for the London Plan.

1. undertake a Gypsy and Traveller accommodation needs assessment within the first two years of this Plan period (based on the definition set out above); or
2. use the midpoint figure of need in Table 10 of GLA Gypsy and Traveller Accommodation Topic Paper 2017 as identified need for pitches (over the next 10 years) until a needs assessment is undertaken as part of their Development Plan review process.

1. Boroughs that have undertaken a needs assessment since 2008 should update this (based on the definition set out above) as part of their Development Plan review process.
2. Boroughs should undertake an audit of existing pitches and sites, identifying:
    1. areas of overcrowding
    2. areas of potential extra capacity within existing sites
    3. pitches in need of refurbishment.
3. Boroughs should plan to address issues identified in the audits.
4. Boroughs should actively plan to protect existing Gypsy and Traveller accommodation capacity, and this should be taken into account when considering new residential developments to ensure inclusive, balanced and cohesive communities are created.

MHSM do strongly agree with ‘G’. For example: in Southwarks Gypsy and Traveller site MHSM understand that a plot and the accommodation that that plot meets for tenants and potentially a family, could be lost directly as a result of redevelopment works on the Bermondsey site. This slow erosion of existing provisions for accommodation must be addressed or risk failing a growing communities need within London.

User:	London Borough of Bexley
The requirements set out in **Policy H16 Gypsy and Traveller accommodation** are noted, along with the acknowledgement in **Paragraphs 4.16.2** and **4.16.3** that this policy is not consistent with government's current planning definition.	

User: Mena Mongan

My name is Mena Mongan, I'm an Irish Traveller living on one of the sites in Hackney. Ihave lived all my life in a caravan, growing up on the roadside in Ireland, moved to London, experienced travelling, being with my family and meeting new people. Iliked being on the move but this also came with prejudice and racism which hurt very much. Iended up settling in Hackney in 1995 where my son Daniel was born and Ihad 4 more kids. Ihave a good memory of being free. Hackney was very good for stopping places, the council used to supply fresh water, toilets and getting help for kids and healthcare. Inow live on one of the council run sites which has been relocated due to the Olympic Games. I have always been interested in speaking up for my community and over the years Igot to know London Gypsies and Travellers as Iwanted to go back into work. Now Iwork there as a community campaigner.

My kids grew up but there is no more room for them on our 8 pitch site so they got pushed on the roadside, in temporary accommodation like hostels and they find it very hard to be in bricks and mortar housing. Ican't understand why they are not allowed to live the way of life of their parents as they grew up with. There are no sites for the young generation and my kids don't understand why they can't travel. This is all to do with the laws and regulations that affect our culture and our way of life.

For the future Iwould like to see a big change in the Mayor's London Plan, for our way of life to be accepted and for new sites to be built. My children want to raise their kids in caravans and not have our culture and tradition taken away.

The way the London Plan policy is at the moment, it comes across as councils don't actually have to do anything to deliver new sites. There has to be a rule so that Gypsy and Traveller sites are at the top of the list alongside all other housing. The london Plan should set targets and monitor what is being delivered. Councils should be able to ask for pitches to be included in larger housing schemes done by housing associations and developers. The GLA should use land it owns or land owned by Transport for london for new site provision.

We are Londoners and want to be counted as Londoners. We are a very loving and caring community, we are all about family and living together with our family is central to our culture and our accommodation needs. So we need the london Plan to make sure that new sites are built for the new generations to come.

I would like to attend the Examination In public hearings on the london Plan to be part of the discussion on this policy.

User:	Ministry of Housing, Communities & Local Government

The Secretary of State’s Letter in response to the draft London Plan consultation refers to inconsistencies with national policy, including the NPPF.

The Mayor should consider whether the approach in the draft Plan is consistent with national policy set out in the National Planning Policy Framework, the Written Ministerial Statement (WMS) of 22 July 2015, and the Planning Policy for Traveller Sites (PPTS) 2015. Annex 1 of the PPTS provides a definition of travellers within scope of that policy statement, and the WMS clarifies that those outside that definition should have their accommodation needs assessed under the NPPF. The PPTS should be in read in conjunction with the NPPF.

User: Mr Daniel Mongan

I'm Daniel Mongan, an Irish Traveller born and bred in Hackney, where I grew up on the caravan site and went to school. After I started my own family and had a son there was no longer room for us on the site. The government is saying it's illegal to be living on the side of the road and because there are not enough sites Travellers get pushed into houses.

I have been in temporary accommodation where I was placed by my local council for 1.5 years. I have separated from my son's mother and the courts said that I can have him 2 days a week every week. This should class me as priority for housing according to the council's website. But two weeks ago they took my accommodation away from me and kicked me out on the streets. They now say I don't class as priority because my son's mother gets benefits for him, so they don't see me as a proper parent, although the courts have made a decision and think I am a good father. I found the council to be discriminating against me and they made me homeless.

I was fortunate to find accommodation through a charity and I hope they will also consider that I have a son and I need a proper place to have him over at the weekend. As a parent I need security and safety, a place where I can look after my son. Thousands of people are being made homeless every year. But for Travellers it's even worse and we are not allowed to live our way of life. There is so much discrimination as well. If you have grown up living on a site being pushed in housing has very bad effects on your mental health. How can the councils and government expect you to live a normal life, get into work, pay a rent in private rented housing if you've gone through all this and have been made homeless? I went on through so much heart ache but I have to keep fighting and fighting.

The Mayor's London Plan needs to make sure there is enough accommodation delivered by councils to keep people from being made homeless and to allow Gypsies and Travellers to continue their culture and ethnic way of life. Permanent sites and temporary stopping places need to be provided the same as other housing and there should be better oversight from the Mayor to make sure this happens.
I would like to attend the Examination in Public to be part of the discussion on this policy.

User:	Chartered Institute of Architectural Technologists

Policies H6, H7, H8, H9, H10, H11, H12, H13, H14, H15, H16, H17 & H18

We are in agreement with the proposals contained in the plan

User:	East of England Local Government Association

At paragraph 4.16.2 of the Draft London Plan, the Mayor has adopted a new definition of Gypsies and Travellers which is different to the Government. It is unclear whether the London Boroughs have agreed to this new definition as paragraph 4.16.6 is in fact a requirement of all of them.

User:	East of England Local Government Association

Additionally, 4.16.7 of the Plan states that London Boroughs should actively plan for Gypsies and Travellers' accommodation needs. The Plan does not clarify the position if this need cannot be met and what steps should be taken to address unmet need.

User: Canal & River Trust

The Trust has previously provided the Mayor with information on the rapid growth in the number of boats on our waterways in London and these figures are presented (rounded) in the waterways section of the ‘Sustainable Infrastructure’ chapter of the Plan. Our Draft London Mooring Strategy provides more information on the growth experienced. The London Assembly Environment Committee also considered this issue it its 2013 report ‘Moor or Less’. Evidence collected by the Trust, from two separate recent surveys (Who’s on London’s Boats and the Boat Owners’ Survey), suggests that approximately 50% of boats on our waterways in London are now used as permanent homes. 50% of boaters responding to the relevant question in our ‘Who’s on London’s Boats’ survey also said that affordability / financial reasons were one of their main motivations for living on a boat. That this growth has occurred at a time when bricks and mortar housing has become less affordable and at a time of welfare changes may indicate that it is in part due to the problems in London’s housing market that the Plan is seeking to resolve.

The Housing & Planning Act (section 124) introduced a requirement for housing authorities to “consider the needs of people residing in or resorting to their district with respect to the provision of places on inland waterways where houseboats can be moored”. Whilst this statutory requirement sits with local authorities, many boaters in London move around regularly, meaning that a proper assessment of needs would need to be carried out at regional or sub-regional levels to have any chance of properly considering the issue. We suggest that policy H16 should be renamed so that it relates to people living in caravans and boats, consistent with the Housing and Planning Act, and it should include a requirement for local planning authorities to work together to consider the needs of people living on boats in London and put in place strategies for how these needs will be met. We suggest that the following wording is added:

<u>G Boroughs should cooperate to consider the housing needs of people residing in or resorting to inland waterways in their areas and to prepare strategies to address issues identified.</u>

We consider that such an approach would help to ensure that the plan better responds to the recommendations of the London Assembly Environment Committee’s ‘Moor or Less’ report than simply relying on the qualified, and currently inconsistent, policy position provided by policies SI16 and SI17.

User: National Bargee Travellers Association

Policy H16 is non-compliant as it fails to address the needs of boat dwellers as required by s.124 of the Housing and Planning Act 2016.

The NBTA therefore requires amendments to H16 and lays out a revised form of H16 below that the NBTA considers to be compliant. While there is no obligation on the GLC to adopt these changes, should the GLC decline to accept these (or changes materially the same as these) then the GLC will be vulnerable to judicial review for (a) promulgating non-compliant policy and (b) failing to take correcting steps when these are identified and requested.

The NBTA draws the attention of the GLC to the requirement laid down in the statutory guidance of Communities relating to the execution of BTAAs [2]. The textual-change recommendations laid out below amount to a consultation response by the NBTA within this scope.
[2] https://www.gov.uk/government/publications/review-of-housing-needs-for-caravans-andhouseboats-draft-guidance

H16
A Boroughs should plan to meet the identified need for:
(i) permanent Gypsy and Traveller pitches;
(ii) permanent boat-dweller moorings;
(iii) Bargee Traveller transit moorings; and
(iv) certain Bargee Traveller facilities.
B As of the start of this Plan period, boroughs should use the following definition of ‘Gypsies, ~~and~~ Travellers, boat-dwellers and Bargee Travellers’ as a basis for assessing need: People with a cultural tradition of nomadism, or living in a caravan or on a boat, whatever their race or origin, including:

1 those who are currently travelling or living in a caravan or on a boat

2 those who currently live in bricks and mortar dwelling households whose existing accommodation is unsuitable for them by virtue of their cultural or habitual preference not to live in bricks and mortar accommodation

3 those who, on grounds of their own or their family's or close relative's or dependant's educational or health needs or old age or other Protected Characteristic, have ceased to travel temporarily or permanently.

C Boroughs that have not since 2008 undertaken:
(i) a ~~needs~~ Gypsy and Traveller Accommodation Assessment in accordance with with s.225 Housing Act 2004 ("GTAA"); or

(ii) a Gypsy and Traveller Accommodation Assessment in accordance with with s.124 Housing and Planning Act 2016 ("n-GTAA"); or

(iii) a Bargee Traveller Accommodation Assessment in accordance with with s.124 Housing and Planning Act 2016 ("BTAA")
~~since 2008 should~~ shall either:

1 undertake:
(i) (based on the definitions set out above) a ~~Gypsy and Traveller accommodation needs assessment~~ n-GTAA; and ~~within the first two years of this Plan period~~

(ii) a BTAA ~~(based on the definition set out above)~~
within one year of this Plan period; or

2 (i) in relation to caravan dwellers use the midpoint figure of need in Table 10 of GLA Gypsy and Traveller Accommodation Topic Paper 2017 as identified need for pitches (over the next 10 years) until a ~~needs assessment~~ n-GTAA is undertaken as part of their Development Plan review process; and

(ii) in relation to Bargee Travellers and boat-dwellers plan for the conducting of a BTAA to be executed within one year of this Plan period.

D. ?Boroughs that have undertaken ~~a needs assessment~~ GTAA, a n-GTAA or a BTAA since 2008 should update ~~this~~ these (based on the definitions set out above) as part of their Development Plan review process.

E. Boroughs should undertake an audit of existing pitches, ~~and~~ sites, transit moorings, permanent moorings and facilities (whether provided by a navigation authority or the Borough) identifying:

1 areas of overcrowding, areas of potential extra capacity within existing sites, pitches in need of refurbishment, areas of potential extra transit mooring capacity, areas of potential extra permanent mooring capacity, moorings in need of refurbishment and Borough-provided facilities in need of refurbishment.

2 Boroughs should plan to address issues identified in the audits.

E1 Boroughs should undertake periodic audits of off-side (non-towpath side) land that could be used for creation of transit moorings and permanent moorings. The work product of these audits should inform the development of strategies to meet the outcomes of BTAAs.

F. Boroughs should actively plan to protect existing Gypsies, y and Travellers, boat-dwellers and Bargee Travellers accommodation capacity, and this should be taken into account when considering new residential developments to ensure inclusive, balanced and cohesive communities are created. In particular where waterside developments are considered these must specifically:
(i) not curtail mooring by boat-dwellers or Bargee Travellers; and
(ii) ensure that, if not already in existence, moorings are made available for use by boat-dwellers or Bargee Travellers; and ~~including specifically developer~~
(iii) not seek to subvert the public right of navigation (including the right to moor for a reasonable time) where this exists (specifically on natural rivers); and
(iv) have these obligations established by means of an agreement with the developer and freeholder under s.106 of the Planning Acts (as amended).

G Boroughs should undertake BTAAs in all cases where navigable water exists or is believed to exist within their boundary, even if this navigable water is not connected to the main inland waterway network.

User: National Bargee Travellers Association

Estimates show there are around 30,000 Gypsies and Travellers in London [59] and 7,600 boat-dwellers and Bargee Travellers [59a]. . Their culture and traditions have developed through a nomadic way of life over centuries, and although many Gypsies, ~~and~~ Travellers, boat-dwellers and Bargee Travellers try to maintain this, the lack of pitches on local authority sites or mooring space (including towpath) on the waterways often presents a barrier to this.

Around 85 per cent of Gypsy and Traveller families in London have been forced to live in housing, or on roadside encampments due to overcrowding, or an unsuitability, or lack of availability of, pitches.

The lack of access to secure accommodation and suitable living environments has far-reaching implications for their physical and mental health, welfare, education, employment and access to the wider opportunities London has to offer.

A smaller number of boat-dwellers and Bargee Travellers in London have been forced to navigate in a pattern that negatively impacts upon employment, access of school children to education, ability to care of aged or disabled family members or in some cases caused the boat-dweller or Bargee Traveller to give up their home entirely.

Although no analytical research has been executed, extensive ad-hoc evidence through NBTA casework has clarified that significant persecution of boatdwellers and Bargee Travellers by both Boroughs and navigation authorities takes place leading to extensive physical and mental health deterioration.

[59] http://www.londongypsiesandtravellers.org.uk/why-were-needed/
[59a] NBTA Response to Chapter 4 (Air Quality) of Mayor’s Draft London Environment Strategy

User: National Bargee Travellers Association

In this Plan, the Mayor has adopted a new definition for Gypsies, and Travellers, boat-dwellers and Bargee Travellers. This is due to (a) the inclusion of boat dwellers in Section 124 of the Housing and Planning Act 2016 and (b) concerns that the existing Government planning definition does not recognise many Gypsies and Travellers, for example:

- Gypsies, ~~and~~ Travellers, boat-dwellers and Bargee Travellers who have ceased to travel permanently due to some or all of:~~;~~

(i) a lack of available permanent pitches, transit sites ~~or~~ stopping places, permanent moorings or transit moorings;
(ii) frequent enforcement action (evictions) leading to homelessness;
(iii) imposition of onerous (and ultra vires) navigation pattern, persecution for non-compliance;
(iv) failure to recognise a Protected Characteristic, subsequent failure to make allowance for the Protected Characteristic and subsequent enforcement action including eviction leading to homelessness;
(v) failure to ensure that children are able to attend school;
(vi) lack of opportunities and barriers to work

- Gypsies, and Travellers, boat-dwellers and Bargee Travellers who live in (bricks and mortar) housing due to the lack of sufficient, affordable and good quality caravan site, transit mooring or permanent mooring provision; ~~or~~
- Gypsies, Travellers, boat-dwellers and Bargee Travellers who live in (bricks and mortar) housing due to their own or their family's or dependants' educational or health needs or old age. This is most likely to affect ~~Gypsies and Travellers~~ families who face multiple and intersecting inequalities (for example older people, people with disabilities, ~~led Gypsies and Travellers~~, women and single mothers); or
- The existing Government planning definition does not include Bargee Travellers who do not travel for work but because they are required by Section 17 (3) (c) (ii) of the British Waterways Act 1995 to travel to a different place every 14 days or who travel because they do not have a permanent mooring or who travel through choice.

User:	National Bargee Travellers Association
For these groups, it is often very difficult or impossible to demonstrate that they would have immediate plans to travel for work in the future (as required by the current Government planning definition although this is the subject of legal challenge) because (i) there are no viable options; or (ii) because doing so would have a significant impact on their health, wellbeing and security of income.	

User:	National Bargee Travellers Association
This often results in Gypsies and Travellers not being recognised or counted in needs assessments, with many needs assessments identifying zero need. This has a direct impact on the housing options available to Gypsies and Travellers, their ability to retain their cultural status and identity, and can lead to greater inequalities in terms of access to safe and secure accommodation, health care and education. In spite of the fact that boat-dwellers and Bargee Travellers fell within scope of s.225 Housing Act 2004 no accommodation assessments of boat dwellers or Bargee Travellers were conducted and consequently the adverse effects listed above have never been assessed.	

User:	National Bargee Travellers Association

Insufficient pitch provision can also lead to a rise in unauthorised encampments, with implications for the health and well-being of Gypsies and Travellers, community cohesion and costs for boroughs. The lack of readily available permanent moorings, the absence of Transit Moorings on the Thames and the persecution of Bargee Travellers by the navigation authority on the canal system has led to grave difficulty for this demographic.

User:	National Bargee Travellers Association

The new definition should be used within London for the purposes of assessing accommodation need, and auditing and protecting existing sites and pitches, temporary moorings space on waterways and permanent moorings on waterways.

User:	National Bargee Travellers Association

Boroughs should actively plan for the outcomes of n-GTAAs and BTAAs ~~Gypsies and Travellers' accommodation needs~~, and should ensure that new sites, new transit moorings and permanent moorings, are well-connected to social infrastructure, health care, education and public transport facilities, and contribute to a wider, inclusive neighbourhood.

User:	National Bargee Travellers Association

To assist boroughs in meeting identified need, Mayoral funding will be available through the Homes for Londoners 2016-21 Affordable Homes Programme for the provision of new pitches, on a single or multi-borough basis, and for refurbishment of existing pitches identified via an audit of existing pitches. Boroughs should note that the New Homes Bonus applies to new permanent residential boat moorings.

User:	National Bargee Travellers Association

If existing pitches, transit moorings or permanent moorings have to be relocated or re-provided within a borough, the new provision should take into account existing family or community groupings and avoid splitting these up wherever possible. The community should be involved in the planning of any unavoidable re-locations to ensure satisfactory solutions are achieved.

User: National Bargee Travellers Association

Where new pitches, transit moorings or permanent moorings are proposed, the pitch and site layouts and the design of service blocks should be accessible and adaptable to ensure they are suitable for a range of users including disabled and older people, and families with young children.

NEW PARAs SUGGESTED 4.16.11:

Boroughs should not create permanent moorings that replace transit moorings on waterways. Where new provision of both permanent moorings and transit moorings is being planned, boroughs should endeavour to increase the overall mooring space available for boat dwellers and Bargee Travellers by utilising sites on the off-side of the waterway (i.e. the non-towpath side) and should investigate the availability of such sites. Boroughs should avoid replacing 14 day temporary mooring space, which is needed by Bargee Travellers, with short-stay visitor mooring space of less than 14 days.

In relation to the facilities needs of boat dwellers and Bargee Travellers, Boroughs should:

(i) inform themselves of the facilities needs (in the abstract) of boat dwellers and Bargee Travellers (for example potable water taps, chemical toilet disposal, compost toilet disposal, “pump-out” toilet holding tank provision, rubbish disposal, recycling and bulky/hazardous waste disposal; and
(ii) identify metrics for the ratio between (a) the numbers of boat dwellers and Bargee Travellers resident in or who resort to the borough and (b) the numbers of each type of facility necessary; and
(iii) identify the number of each type of facility provisioned (irrespective of who performs the provision; and
(iv) where facilities are considered necessary but absent any provision, provide them.

Boroughs should assess the needs of boat dwellers, who have permanent moorings, for residential planning consent for the use of existing leisure (i.e. non-residential) moorings as their homes. Boroughs should develop a strategy for seeking and securing, from the LPA, residential planning consent for existing leisure moorings currently used by boat dwellers, where there is an identified need.

User:	Reigate and Banstead Borough Council

The council would welcome cross boundary discussions over H16 Gypsies and Travellers as

there are shared issues in relation to need and provision.

User:	Elizabeth Maughan
Full comment - see attachment	

User: London Borough of Newham

Policy H16 Gypsy and Traveller accommodation

Whilst LBN are committed to supporting Gypsy and Traveller communities, draft policy H16 is objected to as it fails to conform with the national policy position, under which local planning policy pertaining to Gypsy and Travellers has recently been prepared.

Planning policy at national level, Planning Policy for Travellers Sites (2015), is clear that in planning terms Gypsies and Travellers are persons of a nomadic habit of life (i.e. those that travel for the purposes of work). Prepared in accordance with the PPTS, using a methodology accepted by various Inspectors in terms of establishing planning need under the new definition, as well as how the needs of those who do not should be interpreted, Newham's Gypsy and Traveller Accommodation Assessment 2016 is a robust credible demonstration of the planning need in LBN for Gypsy, Traveller, and Travelling Showperson's accommodation. The document which demonstrates no planning need within the borough, informed LBN's now adopted Gypsy and Traveller Accommodation DPD (2017) that does not contain any site allocations.

Whilst households that do not travel fall outside of the planning definition of a Traveller, LBN are mindful that this does not negate any responsibility to such persons. However, it is the responsibility of the Council in its role as a Local *Housing* Authority - under the Housing Act (1985) and Housing and Planning Act (2016) - to assess and consider how to meet the need for non-travelling Gypsies and Travellers, as part of its wider responsibilities to plan for the accommodation needs of the settled community and in light of the Equalities Act (2010). The housing needs of all Gypsy and Traveller households have in fact been assessed by Authority's SHMA (2016), albeit in aggregate, whether they travel or not. As such, in planning terms LBN will meet their need as part of planning to meet the overall OAN. Furthermore, provisions set out in the Housing and Planning Act (2016) includes a duty for local authorities to consider the needs of people residing in or resorting to their district with respect to the provision of sites on which caravans can be stationed.

Policy H16 therefore would be unjustifiably costly for LBN in terms of renewing evidence base given the timeframes specified, or would result in a reliance on out of date GLA evidence. It is submitted that the GLA should instead undertake this work at the regional level with the input of boroughs, and support sub-regional cooperation and co-ordination to ensure that needs are met.

User:	London Borough of Sutton

SUPPORT. The London Borough of Sutton supports the Mayor’s definition of Gypsy and Travellers, which is consistent with how the Sutton Local Plan has defined Gypsies and Travellers.

User: London Borough of Ealing

The Council notes that the draft London Plan introduces a new and broader definition for Gypsies and Travellers which differs from the existing Government definition. A joint evidence base report (GTANA) is currently in preparation in association with a number of other West London boroughs and this suggests that if the new definition were to be applied there would be a shortfall of 26 pitches for the London Borough of Ealing and 200 over West London. This currently excludes any assessment of need from households living in bricks and mortar which is likely to increase the levels of need by some margin. This will have serious financial and land use implications for the Council and neighbouring authorities.

Land that is suitable for residential development is at a premium and more housing need could be met by high density housing developments rather than caravan pitches. Our estimate is that it costs approximately £100k to put in place a new pubic pitch and in the region of £5m per hectare for land purchase in West London. Therefore the financial implications are huge if the London Plan definition were to be adopted. Whilst it is noted that Mayoral funding will be available through the Affordable Homes Programme to help meet such needs, this is likely to be oversubscribed and insufficient.

A definition that includes gypsies and travellers who live in bricks and mortar is therefore not considered appropriate.

User:	Peabody

We welcome the recognition that Gypsy and Traveller accommodation is included in the Plan and especially welcome the proposed 'cultural' definition when assessing local need. We would encourage boroughs to consider a range of new accommodation for Gypsies and Travellers including Group Housing which may be compatible with other new housing developments.

User: Gravesham Borough Council

Gypsy and Traveller accommodation

The draft London Plan includes a policy specifically dedicated to Gypsy and Traveller accommodation using the Mayor’s definition which differs from the current Government planning definition. The Mayor has adopted a new definition for Gypsies and Travellers because of his concerns that the existing Government planning definition does not recognise all Gypsies and Travellers because of the need to have immediate plans to travel for work in the future. It requires boroughs to carry out accommodation needs assessments and to plan to meet identified need based on the new definition.

We are concerned that the Mayor is proposing to use his own definition and not the definition which is intended to apply nationally. An inconsistent approach to definitions could cause problems when looking at need across Boroughs and surrounding districts, especially if the area isn’t intending to fully meet its need.

User:	Richard Bennett

Policy H16C (2) refers to the Table 3 of GLA Gypsy & Traveller Accommodation Topic Paper 2017, it is suggested that the figures in that table should be incorporated into the London Plan. Boroughs should be required to work to those figures in the first instance and whilst a new GTAA is carried out on a London-wide basis by the Mayor. See 2[d] above.

User: Richard Bennett

There should be a policy aimed at ensuring that Boroughs do not delay delivery of pitches for Gypsies & Travellers against the existing targets whilst a new GTAA is carried out. Boroughs should, initially, be required to plan for Gypsy & Traveller site provision based on the midpoint figures referred to above whilst a new GTANA is carried out. This is important because, unless this is done, there will be further delay built into the system that will further exacerbate the current chronic shortfall in pitch provision.

There should be a new policy requiring Boroughs to publish their trajectories for pitch delivery on an annual basis in the same way as they are required to publish their trajectories annually for housing completions.

There should be a new policy that ensures that 10 year pitch requirements are met.

User:	Richard Bennett
Policy H16 E requires a time frame to be added – within one year.	

User:	Richard Bennett
Para 4.16.4 line 3 refers to ‘housing’ – this should be ‘accommodation’.	

User:	Richard Bennett
Para 4.16.10 refers to new pitches and design without referring to the DCLG Design Guide – it is acknowledged that this document is now some years old but it is the best available and actually quite good! It should be referred to in this paragraph.	

User:	Richard Bennett

The new definition of Gypsy & Traveller is welcomed but the definition makes no reference to boat dwellers and others. Also, the definition tries to define race in terms of lifestyle rather than accepting ethnicity as the definition of race. Further, the new definition will be of little value if there is in-built discrimination within the London Plan in the treatment of Gypsies & Travellers with pitch provision as compared to all other Londoners and their accommodation provision.

User:	Richard Bennett

Policy H16 F needs to read in conjunction with para 4.16.9. Where it is necessary to relocate existing pitches – and this should be only under exceptional circumstances – it should be a requirement that the new pitches are made available prior to the existing pitches being removed from use. Further, there should be an understanding that the new pitches should, at least, meet the specifications in the old DCLG Site Design Guide. If it is unacceptable to use the DCLG Site Design Guide, the London Plan should include a site design guide.

User: Angela Mahoney

I am a 16 year old Irish Traveller living on a site, in a caravan in Bow. If I was forced to live in a house I feel like I would be caged in and out of my comfort zone. I would have mental health issues and feel more scared to live there.

It is much harder for our children to live the way of life if they live in houses. Gypsies and Travellers children can learn from each other and play in and out of the caravans and our men can get work because there are working together. We watch our children play and watch them learn from one another by putting us in a house we cannot live in the same way. This is our way of life.

By leaving it up to the councils to give us more sites we are never going to get them because to the councils we don’t matter and they never listen to us. I would love to have more sites built, the councils are not giving us more sites. They instead are taking our identity away from us. We are lower on the list than the students, they are listened to but we are not.

The mayor we should put more pressure on the councils so they include us and count us. We all feel like we don’t count and that they don’t want to help us. It actually feels like they want to hide us. They force us off in houses and we feel caged and scared to walk out of our front door.

Gypsies and Travellers we learn from each other and guide each other and we can’t do that when we are in a house. We love each other because we are family and friends, we have large extended families. We have lived together like this since childhood.

As the Mayor of London I wish you could see us and count us. We need more pitches, our home is London just like so many other communities and we live on sites, these are our homes.

I hope you listen to us and build more sites.

User:	Andrea Carey Fuller

In D5, GG1 F, SD6 H, H16 4.16.10 and S6, add ‘children and young people as follows: disabled people, older people, children and young people and families with young children.

User:	Kent County Council

Expand H16 D 3) as follows to ensure good design and resilience for G&T sites and pitches :

3)pitches and sites in need of refurbishment and/or provision of enhanced infrastructure(including utilities, open space and landscaping).

User: Mr Ray Smith

The policy is something I would fully support but it is important that this reflects the huge contribution made by Travelling Showpeople to the family provision of entertainment for communities in London. Funfairs and Circuses, small and large, visiting local areas bring people to their local parks for high quality value for money entertainment and also pay to local authorities significant revenue, therefore rather than subsidised festivals which are of course vital to the life blood of the Capital, they are contributing in every way. Furthermore Funfairs are now found at events celebrating the cultural diversity of London at functions such as Christmas, Diwali, Eid, Chinese New Year and many more.

Unfortunately the Draft London Plan has no reference at all to Travelling Showpeople in any section, including the vital aspect of homes where they are excluded from any mention. They should also appear in this section.

User: London Borough of Camden

The Council agrees that that the London Plan should seek to make provision for the accommodation needs of travellers, but does not consider that the provisions in criteria B and D of Policy H16 are appropriate or consistent with national policy.

In particular we object to the use of a distinct London Plan definition to require boroughs to plan to meet specialist needs of:

- those who have ceased to travel permanently;

- those who have a cultural preference not to live in bricks and mortar accommodation.

We object to the inclusion of those who have ceased to travel permanently because their inclusion directly contradicts the national definition provided in the Planning Policy for Traveller Sites (PPTS), which was amended in 2015 to exclude this group. In effect, Policy H16 redefines travellers to include people who do not have a nomadic lifestyle, and therefore do not need specialist accommodation to support it.

We object to the inclusion of 'preference' for a particular accommodation-type in the definition because 'preference' is not currently considered to be an aspect of housing need for any group, and its inclusion could have far-reaching implications. There are many other groups, including other groups who have protected characteristics in terms of the Equality Act 2010, who would have some justification for claiming a preference for a particular housing type.

We consider that the London Plan Policy H16 and the accompanying Gypsy and Traveller Accommodation Topic Paper 2017 are based on a misconception of which aspects of eligibility arise from the definition in the Planning Policy for Traveller Sites (PPTS), and which aspects arise from an interpretation of that definition based more broadly on case law. We appreciate that a number of need assessments have adopted an interpretation such that a traveller is only eligible for inclusion in the assessment if he/ she has regularly spent periods living in another location for work or economic purposes, and we recognise that many travellers find it very hard to demonstrate that they satisfy this test. However, the test is not intrinsic to PPTS definition.

It is perfectly possible for a needs assessment to be carried out on the basis of the PPTS definition whilst adopting a broader and more sensitive view of what constitutes travelling. In this respect, we note that PPTS indicates in paragraph 7 that authorities should cooperate with travellers, their representative bodies and support groups to understand accommodation needs, and we note that PPTS Annex 1 indicates that factors to be considered in determining whether persons meet the definition of gypsies and travellers include any previous nomadic habit of life, reasons for ceasing that, and any future intention to adopt a nomadic habit of life. The Council would not object to guidance in Policy H16 or supporting paragraphs that when needs assessments are carried out, these should be sensitive to the cultural traditions of gypsies and travellers, and should not take a narrow economic view of what constitutes a traveller.

The London Plan's proposed definition would be likely to lead to a significant increase in the assessed need for pitches. The effect of the definition would be that any individual or household could state a cultural preference not to live in bricks and mortar accommodation, and boroughs would need to plan to meet that preference. This would create expectations that simply cannot be met in terms of site availability and cost. The Mayor's estimate that there are 30,000 gypsies and travellers in London contrasts markedly with the 2011 Census count of 8,196 usual residents who identified as gypsies or Irish travellers.

The London Plan's proposed definition would be likely to lead to a significant increase in the assessed need for pitches. Preference for a particular accommodation-type does not usually form part of a definition of housing need, and could create expectations that simply cannot be met in terms of site availability and cost. The Mayor's estimate that there are 30,000 gypsies and travellers in London contrasts markedly with the 2011 Census count of 8,196 usual residents who identified as gypsies or Irish travellers.

In Camden, feasibility work carried out by officers suggests that minimum pitch sizes would need to be around 150 sq m to 200 sq m in order to accommodate a mobile home (or alternative light weight construction), a utility block and touring caravan. This site coverage is equivalent to a residential density of around 60 homes per hectare, which is extremely low compared with residential sites in and around Central London. A London Plan requirement to house a much larger number of households at this density is not consistent with other London Plan provisions seeking to make efficient use of land (such as Policy D6 Optimising housing density and Policy H1 Increasing housing supply), will make it almost impossible for Central London boroughs to bring forward local plans that are in general conformity with the London Plan in terms of provision for gypsies and travellers, and will harm the ability of LB Camden and other boroughs to deliver the number of homes envisaged by London Plan Table 4.1.

Our feasibility work also suggests the value of land needed for each pitch could be £830,000 to £950,000, and the income generated would be negligible. If provided on Council land that would otherwise be developed (or sold for development), this represents a significant financial loss; if provided on a private development site this would severely diminish our ability to secure other public benefits such as affordable housing. While the GLA has offered financial assistance towards provision and refurbishment of pitches, the cost of GLA funded schemes from 2011-15 ranged from £11,000 to £110,000 per pitch (average £49,000), which is a fraction of the likely cost of a pitch in the Borough.

The Council considers that the Mayor should collaborate with boroughs to carry out a new pan-London assessment of pitch needs on the basis of the national definition of gypsies and travellers. The Council also proposes that the Mayor should work with the boroughs to consider how needs can be met on a pan-London basis, and should provide meaningful assistance towards meeting those needs in terms of making suitable GLA land available and/or in terms of providing grant levels commensurate with the cost of providing land and delivering fully serviced pitches with utility blocks.

As stated above, the Council would not object to inclusion in the London Plan of guidance that when needs assessments are carried out, these should be sensitive to the cultural traditions of gypsies and travellers, and should not take a narrow economic view of what constitutes a traveller.

User: Noah Purcell

It's been a long time coming...

...but I know change is gonna come

Response to the draft London Plan

Policy H16 Gypsy and Traveller accommodation

I am a member of the Gypsy and Traveller community and a Londoner. I want to thank you for recognising us in your new definition and asking boroughs to make sure they count the needs of everyone in our community.

I am concerned that Policy H16 is not strong enough. You are asking boroughs to build 66,000 new homes a year over the next ten years. Pitches are homes, new pitches will go towards meeting your housing targets and boroughs should be held accountable if they don't deliver.

You can make the London Plan stronger by protecting existing caravan sites and ensuring the delivery of new sites.

#wearelondonerstoo #weareallsomanythings

User:	Ellena Costello

I am concerned that policy H16 is not strong enough. You are asking boroughs to build 66,000 new homes a year over the next ten years. Pitches are homes, new pitches will go toeards meeting your housing targets and boroughs should be held accountable if they don't deliver. You can make the London Plan stronger by protecting existing caravan sites and ensuring the delivery of new sites.

User: Marian Mahoney

I am Marian Mahoney, I'm an Irish Traveller and live on the Old Willow Close site in Tower Hamlets. I've been an activist for Travellers' rights for 40 years. I have travelled all over England and London and together with my family we always fought to have facilities and official designation after the 1968 Caravan Sites Act was introduced. We finally settled in Bow and got the site recognised and designated by the council and have been there for 36 years. Our site was threatened by the Crossrail redevelopment and we had to fight for 10 years to keep our site. There are 19 pitches on the site and 3 generations live here, but no new sites have been in built in Tower Hamlets to house growing families and young people. The council knows how many kids there are on the site who need their own pitch, yet nothing has been done to meet this need.

We are hoping that the London Plan will ask every council to build at least 3-4 pitches every five years; we only need small sites, not big pieces of land. When other housing gets built they need to acknowledge Gypsies and Travellers who work and pay taxes in the area and treat them the same as everyone else, while recognising our ethnicity and way of life and the culturally suitable homes we need. There is money available for sites from the Mayor and shouldn't be so hard to build new sites if we were included with all the new housing that is getting built.

We have been discriminated and prejudiced for centuries. This affects our culture, education, families. Because there are not enough sites, we get pushed into housing, our families suffer from mental health, our old people are not being looked after because there is nowhere to live. We are Londoners and we want the same as everyone else. The Mayor and each borough should monitor that sites are getting delivered and that funding is being used. Under the previous Mayor money was sent back by councils because they said they can't find any land.

We see the evidence of land becoming available to build supermarkets and other things, yet there is never anything for Travellers. It is very cruel what's happening to us and it's time to stop this. We need a fair Mayor who can ensure there will be delivery. I would like to attend the Examination in Public to contribute to the discussion on this policy

User: London Gypsy and Travellers Forum

The London Gypsy and Traveller Forum aims to improve the lives of Gypsies and Travellers in London, particularly in relation to their accommodation needs; and to promote their rights as Londoners, to equal treatment. It does this through exchange of information, discussion, promotion of good practice, challenge of poor practice, and advice to the GLA, the London Mayor and all other London authorities.

The Forum is open to London Gypsies and Travellers, organisations representing them, council officers, elected representatives, service providers and other interested individuals and organisations who live or work in London, and who support and are prepared to work towards the above aim. The Forum was established in September 2004 and meets on a quarterly basis at the City Hall when possible. The Forum's response to the Draft London Plan is based on the discussion we had at the meeting held on 13th February 2018 at City Hall. There is support for the new definition of Gypsies and Travellers in the London Plan, however there were concerns expressed regarding how this will be taken up in Local Plans

User: London Gypsy and Travellers Forum

Policy H16 was considered to go in the right direction, but not strong enough to ensure the actual delivery of new sites. Many participants, particularly members of the Gypsy and Traveller community expressed disappointment at the lack of ambition of the policy. The disparity between the general housing policies and the Gypsy and Traveller accommodation policy was also noted – in terms of the evidence base, approach to delivery and monitoring.

In the Strategic Housing Land Availability Assessment land is earmarked for 65000 new homes, but this does not include land for Gypsy and Traveller sites. Councils are under pressure to build all the new housing, which leaves very little available land for any new pitches. Members of the Gypsy and Traveller community across London gave examples of how no land has been identified in their local authority development plans, despite this being required by national planning policy. Community members have repeatedly made suggestions and submitted site proposals to their local councils but this has not resulted in any real change. The London Plan should require councils to identify land and have a rolling 5-year supply of land updated annually, in line with the general housing requirements.

Using the 2008 GTANA figures as a ten year identified need is not necessarily the best approach, as some councils had identified a very low figure. However, the 2008 GTANA mid-point is a reasonable indication of backlog need and should be used as a target in the London Plan for speedy delivery over the next 5 years. The GLA should commission a new London wide study in line with the housing evidence base within the next 5 years to have an up to date assessment of need.

User: London Gypsy and Travellers Forum

Given the failure of successive governments to adequately address the needs and human rights of Gypsies and Travellers, this London Plan should be driven by delivery. A comparable approach to housing delivery should be taken in the London Plan – through securing new pitches in larger residential schemes, supporting housing associations, charities and developers to make provision for Gypsies and Travellers, so they are not pushed onto the worst pieces of land which are left over from plan making that is driven by housing.

There should be ways for the Mayor to hold local councils to account if they do not deliver on their targets and identified need. New pitch delivery should be included as a Key Performance Indicator in the Monitoring chapter.

There are cases of very significant local opposition to Gypsy and Traveller site delivery – for example in Lewisham there were two petitions signed by hundreds of people to oppose the allocation of land for three new pitches. The Mayor should send a message through the London Plan that discrimination against this community is not acceptable.

User: London Gypsy and Travellers Forum

There are concerns about the Affordable Homes Fund as this is a limited amount of money and councils and registered providers will apply only for housing delivery if they are not actively supported to deliver Gypsy and Traveller sites.

The London Plan should also support the provision of private sites. Although these are less common in London, there are a few Boroughs where community members have been able to buy low cost land in the Green Belt. The Plan should allow for some flexibility on Green Belt land where councils are unable to identify other suitable locations.

The London Plan is deficient as none of the policies address the accommodation needs of Travelling Showpeople and Bargee Travellers or houseboat dwellers.

The London Plan cover illustration – the map of London – should include caravan sites and boaters' communities in recognition that London's diversity needs to be inclusive of different types of accommodation.

Policy H17 Purpose-built student accommodation

User: Get Living London

GLL supports the proposal to link ASA rents to the market by applying a nationally recognised index such as CPI. It is not however considered appropriate to allow borough's the option to link ASA to levels set out in the Mayor's ASA. This would result in detachment from the market, prohibiting institutional investment.

Specific Amendment Sought

GLL considers that para 4.17.10 B should be amended to delete *'A review period, such as every three years, could be set by the borough to allow for recalibrating the affordable student accommodation to the level stated as affordable in the Mayor's Annual Monitoring Report'* to ensure the plan is effective.

User: Get Living London

GLL supports confirmation that PBSA should not be required to provide conventional Use Class C3 Affordable Housing. It is however considered that this should be made explicit within Policy H17.

Specific Amendment Sought

GLL considers that Policy H17 should be amended to add sub section to Policy H17 which states *'PBSA should not be required to provide on-site provision of, or a contribution towards, conventional Use Class C3 affordable housing'* to ensure the plan is effective.

User: Get Living London

A requirement to focus PBSA delivery in locations which are well connected to local services is supported. It is however considered that a further requirement to ensure PBSA is located away from existing concentrations in Central London is contradictory. Providing PBSA within the finite number of Central London locations which have excellent connections will ultimately lead to a degree of concentration.

Specific Amendment Sought

GLL considers that Policy H17 (B) should be amended to delete '*but away from existing concentrations in Central London*' to ensure the plan is effective.

User: London Borough of Islington

Draft London Plan Policy

Policy H17 Purpose built student accommodation

Islington Response

The new London Plan policy on student housing carries forward the current policy which specifically seeks ‘dispersal’ of such accommodation away from Central London boroughs such as Islington. The policy has been expanded to include requirement for affordable student accommodation which provides a proportion of rooms at a discounted rent. While the principle of securing affordable accommodation would normally be supported, we are concerned that this effectively amounts to a subsidy to allow people to live in what is often fairly luxurious and expensive accommodation, which may not be the best use of such subsidy. There should be some flexibility to secure equivalent off-site AH contributions which could then be used to deliver genuinely affordable housing.

Our main concern with this policy is that our ability to continue with our policy of securing student bursaries from student accommodation schemes might be jeopardised. We are the only borough in the country that requires a proportion of annual rent to be provided in order to fund bursaries for Islington students in hardship. The new London Plan policy should recognise the importance of local approaches to increasing opportunities to access higher education, and that the requirement for affordable student accommodation may need to be balanced against this.

The supporting text, para 4.17.2 encourages boroughs to allow temporary use of student accommodation during vacation periods, for ancillary uses. There is often pressure to use accommodation for general short-term letting (akin to a hotel), which can cause amenity impacts. While we note that para 4.17.2 does not use this example, it is not an exhaustive list, and we would fully expect operators to argue that a vast array of uses would be ancillary. The paragraph should be amended to explicitly rule out use as general visitor accommodation and state clearly that any ancillary use must be a specific use related to a university activity.

User: Stonewall Housing

Similarly, for student accommodation (**POLICY H17**): to achieve the aim of mixed and inclusive neighbourhoods the London Plan should address the specific needs of LGBT communities. New student accommodation is being developed in Stockton for trans students and similar initiatives should be on offer in London. LGBT people surveyed in the Still Out There report, funded by Trust for London in 2016, expressed concern that there were no LGBT-specific services in their local area, which is now more troubling since 2 more London-based LGBT charities have closed since the survey was carried out. Therefore, the London Plan should address the loss of these assets just as much as the loss of commercial venues (**POLICY HC5**) by supporting the London LGBT voluntary sector to attract more investment to meet its communities' needs.

In 2016, Stonewall Housing opened two more supported housing schemes for LGBT people over the age of 25 years old with partners using intensive housing management to fund part of the support offered. These have proved vital for people who do not have the support networks of family and friends and they have developed their own peer support network as well as received specialist support from Stonewall Housing to support their access to employment and more permanent accommodation. However, for such schemes to be replicated across the city, especially in the light of potential changes to the funding of supported housing, the London Plan should support voluntary and community groups to develop new innovative solutions to ensure their communities' housing and health needs are addressed.

User: London Assembly Planning Committee

Recommendations The Assembly welcomes the encouragement in this policy, as we advocated in 2015, for new student accommodation focused on locations outside of central London. This is often more affordable, offering a greater range of price points to students. We have previously suggested that PBSA developments should require an affordable element, so we cautiously accept the inclusion of PBSA in the threshold approach. We would also like to see in the supporting text the need for a diversification of room types on offer to students, including non-en-suite rooms or shared rooms, which are generally cheaper to rent.
5.43 In 2015 the Housing Committee met to examine the issue of providing PBSA in London. We heard from a range of experts, including students, and visited a variety of different types of student accommodation. The committee heard concerns from universities and students' unions about the impact that rising rents are having on students from middle-income backgrounds and students with siblings, as well as the increasing lack of affordability of student accommodation. A large percentage of new rooms were en-suite (over half in 2012/13) meaning that rents for these rooms were high.
5.44 Including affordable accommodation is likely to lead to increased costs for developers or reductions in quality of accommodation, particularly in inner London. This requirement should encourage wider dispersal of PBSA to outer London. However, we would suggest that this decision is kept under review, in case it detrimentally affects the provision of student accommodation in London as a whole.

User: Newham Union of Tenants

H17 Purpose-built student accommodation

We propose that the following be added to this policy

- Student housing should not compromise capacity to meet the need for conventional homes (particularly social / low cost rented homes).
- New student housing should be avoided in boroughs that already have the highest concentrations: Camden, Islington, Southwark and Tower Hamlets – identified in the last London Plan and any other boroughs that may also have very high levels of student densification.
- There needs to be a way of measuring where development of student housing does / doesn’t contribute to delivering mixed and inclusive neighbourhoods.

User:	London Borough of Lambeth

Lambeth supports the policy approach but, on sites that would otherwise be suitable for general needs self-contained housing, boroughs should be given scope to require general needs affordable housing or a contribution to this. Otherwise, high values associated with PBSA will compete for land with general needs housing providers – a phenomenon already experienced on several sites in Vauxhall. The priority should be general needs housing, with a managed supply of PBSA to meet a defined level of specialist need for this type of accommodation, rather than a market-driven approach.

Lambeth welcomes the provision in this policy that discourages the location of PBSA close to existing concentrations in central London.

User: University of the Arts London

UAL shares the Plan’s intention to increase the affordability of student accommodation in London. Affordability is a material consideration for most of our students, as it is for our early-career alumni.

We welcome the requirement that providers must work with an institution for their development to qualify as PBSA. This will provide an incentive for developers to collaborate more closely with institutions to provide facilities that support students properly.
We note the Plan’s proposal to adopt the student maintenance loan as the baseline criterion for affordability, tied to a target of 35% of units at this level. In principle, we applaud the ambition in this proposed measure.

However, the measure is unrelated to the market and does not adjust for differences in cost of provision between e.g. Zone 1 and Zone 4. If the plan pushes the affordability threshold on universities and developers without allowing any flexibility, schemes could become unviable. This is likely to:
• drive up costs for 65% of students in order to reduce costs for 35%. This is clearly inequitable
• reduce the overall stock of new student housing, particularly in central London, as fewer schemes will be regarded as achieving maximum value from the developers point of view

These consequences are due to the fact that, unlike in the rest of the housing market, there is a natural ceiling to rents among students, most of whom fall into demographic category E for the duration of their studies. The viability threshold for PBSA is therefore lower, particularly where land is expensive, than for other types of development.

The measure appears to be targeted at commercial developers, operating on a good margin with their rents. However, for institutions who deliberately do not make a margin on student rents, this measure is likely to make it unviable for them to build their own PBSA. For example, UAL recently invested in new halls of residence, which we operate at a low margin as part of our affordability strategy. We aim to generate from rents the surplus to recoup the cost of building over a 20 year period. As an institution, UAL deliberately does not seek to make a margin on student rents – it provides good quality affordable student housing at or near breakeven. The Plan's measure is likely to make it unviable for institutions with the same approach as UAL to build their own PBSA, because the cost of land, finance and building cost all make the recovery period for invested capital excessive.

To ensure continued viability and avoid these consequences, the planning authority would need to take concomitant measures to reduce land prices, for example by releasing more sites for student housing. In the meantime, we suggest the Plan balances the affordability test with an additional viability threshold which factors invariables including type of developer and area of London. The proposed Viability Tested Route will not give the sector the ability to plan affordability strategically in partnership with the Mayor.

We also note that there should be a mechanism to review the maintenance loan for living costs as a benchmark for affordability. The maintenance loan includes a CPI inflater which will not necessarily move with the market or with the cost of living in London.

User: Greystar Europe Holdings Ltd

Student Housing
The recognition that the role student housing makes to the residential sector, as set out in paragraph 4.1.1, is welcomed.

- The recognition of the local and strategic need for student housing identified in Policy H17 ‘Purpose-Built Student Accommodation’ (PBSA), is strongly welcomed by Greystar. However, the need for Point A(2) within the policy is questionable given that the land-use for student accommodation is Sui Generis and will be secured within any given planning permission through the description of development, and associated application documentation that is approved.
- Linked to this, Point A(3) is considered to be unnecessarily restrictive where it requires student accommodation to be occupied by students from specified higher education institutions. Greystar’s student lettings via specific institutions currently accounts for approximately a quarter of our total in London but, by limiting the accommodation students can access to certain developments in certain places, the market will be unnecessarily skewed.
- Furthermore, there is relatively little PBSA in London and therefore much of the student accommodation is substandard conversions of existing stock, often at the expense of family dwellings.
- To limit PBSA to certain institutions, it is considered that this will not alleviate this issue and could in fact increase the problem in certain geographical areas. Furthermore, the higher education system is dynamic, constantly changing and is moving away from the historic focus on a smaller number of larger institutions. The proliferation of smaller institutions is growing swiftly, and these organisations will not have access to the residential capacity or financial ability to link to a PBSA development. As a result, this could severely restrict the number of students from smaller institutions living in PBSA, putting even more pressure on the residential housing market.
- With regard to Point A(4) of Policy H17, there are concerns with regard to this requirement and particularly the link to government policy on grants. PBSA developments are undertaken in a market context with all the associated costs of development. Any discounted rate should be considered against the market, not against government policy on grants (which could change). Furthermore, requiring affordable student accommodation will inevitably force up the cost of the market product which will make the units less affordable more generally.
- Greystar remain concerned that the combination of Points A(3) and A(4) of Policy H17 will serve to constrain future opportunities for PBSA and for the affordability of the market units within PBSA. Where the pipeline of units is constrained, and the units coming forward are artificially costly, the result is surely to be increased pressure on the wider London housing market.

- A further concern relates to supporting paragraph 4.17.4. This paragraph notes that where ascheme is not linked to a higher education institute, it will be treated in accordance with PolicyH18 ‘Large-Scale Purpose Built Shared Living’. Greystar believe that a scheme must be able to beapproved as student accommodation without a nominations agreement, but Policy H18 is notcurrently drafted to allow for such an occurrence. Equally, the affordable housing requirementthat such schemes are subject to is far in excess of those in Policy H17 and would thus furtherreduce the likelihood of PBSA schemes coming forward
- With regard to supporting text paragraph 4.17.13, it is suggested that the link to conventionalUse Class C3 affordable housing is removed entirely. Allowing such a link will again reduce theaffordability of the PBSA units brought to the market and reduce accessibility to a wider groupof students. Furthermore, it will also serve to dis-incentivize PBSA developers from bringingforward much need student accommodation to relieve the strain on the housing market.
- Lastly, we note that Policy T5 ‘Cycling’ and associated Table 10.2 sets minimum cycle parkingstandards. These suggest student accommodation should be provided with one cycle space perstudio i.e. 1 space per bed. This level of cycle parking is far in excess of what is needed, used oris reasonable to provide. As evidence for this view, Greystar currently operate over 4,500 bedspaces in TfL Zones 1 and 2 (the remainder of our portfolio is in active development). In the2017-18 academic year, we note there are currently 118 bikes stored throughout this portfolio.There is cycle parking capacity for 646 cycles and so this equates to a usage level of less than 20%overall, or 0.14 spaces per bed in the portfolio.
- The policy requirement in Policy T5 would therefore be to increase this ratio by ten-fold. InGreystar’s experience there is no evidential basis for this substantial increase in provision andthis should be revised downwards, particularly where operators promote specific cycle-hireschemes within their communities or where PBSA is located within easy reach of widercommunity cycle hire schemes. If the currently prescribed level of provision is not amended, itis considered that this requirement would be a further burden on development and at thedetriment to the delivery of providing PBSA.

User: London Tenants Federation

4.17.1 Policy H17 Purpose-built student accommodation

We propose that the following be added to this policy

- Student housing should not compromise capacity to meet the need for conventional homes (particularly social / low cost rented homes).

- New student housing should be avoided in boroughs that already have the highest concentrations: Camden, Islington, Southwark and Tower Hamlets –

identified in the last London Plan and any other boroughs that may also have very high levels of studentification.

- There needs to be a way of measuring where development of student housing does / doesn't contribute to delivering mixed and inclusive neighbourhoods.

4.19.1 Proposed additional Policy – Co-operative / community led housing.

We propose that the Mayor should

(i) work with existing, newly formed or developing London-based co-operatives, TMOs and CLTs to assess their existing and future potential (including resources and capacity) to develop new social / low-cost rented homes;

(ii) with the boroughs, identify and set aside public land that might be available to them to deliver community led housing;

(iii) with the boroughs, develop a London-wide list / online map of potential small development sites to match co-operatives / community led housing organisations with available development sites (particularly public land) for homes that will remain in perpetuity at costs that can be afforded by households of below median income levels;

(iv) provide support social housing tenants who wish to manage or collectively own their own homes.

User:	London Borough of Haringey

The Council supports this policy and its emphasis on ensuring mixed and inclusive neighbourhoods.

User: RICS

More homes and better use of stock

We believe there is an enormous potential to address shortcomings in the housing market by providing homes and accommodates specifically for certain demographics, such as for older people (**Policy H15**) and students (**Policy H17**). Supporting the delivery of homes specifically for those demographics could not only provide accommodations more suited for their needs, it could also free up larger homes to go back on the market for others on the housing ladder, as well as provide additional sources of investment into housing.

RICS, in its 2015 Residential policy paper, made recommendations to government to support older people downsize when they want to. Homeowners over 55 are sitting on a substantial amount of housing wealth, which can be used to fuel housebuilding if new developments are marketed to them and cater for their needs. This could also release larger homes back onto the market, effecting a movement along the housing ladder, when older people downsize. The relevant recommendations are:

- RICS endorse recommendations that arose from the APPG on Housing and Care for Older People's inquiry into 'The affordability of retirement housing'. This includes the support for alternative ownership models, the stamp duty land tax discount for older people in lower value homes under 'Help to Move' and a requirement for local authorities to provide housing and financial advice to people as they transition into old age.

  ?

- RICS has found that communication of housing options for older people were poor meaning that emerging models for housing in later life that included retirement rentals, co-housing, housing co-operatives and shared ownership models were not fully exploited. Moreover, there is an apparent disconnect between financial advisers and housing advisers meaning that those providing advice on one topic are not fully aware of the options available in the other.
- RICS recommends that government, both central and local, work with the property industry and financial advisers to create and develop an innovative catalogue of housing solutions for older people. Then use key transition and contact points in the aging process (e.g. when applying for age related benefits) to distribute that information.

- We also recognise there is a very strong emotional dimension to people’s homes, with considerable effort, both physical and emotional, to moving.
- In recognising the difficulty of moving one’s possession at an older age, we recommend providing a moving fund to help with moving costs. This is similar to something that is already offered by Bristol City council.
- Knowing one’s neighbours and feeling a sense of community is also an important factor in deciding to move homes for some older people. RICS recommends that local authorities and industry work together to provide accompanied visits to suitable properties to mitigate emotional distress and create a more positive experience.

User:	London Borough of Lewisham

We support H17 and student accommodation. We have a number of universities and FE institutions and due to its good links to the Central London universities, we believe that our highly accessible location is appropriate for student accommodation.

However, we feel that at least 50% of accommodation should be affordable.

User:	London Borough of Brent

The Borough supports the policy. Whilst the previous London Plan had some commentary about ensuring that provision of student accommodation did not undermine conventional housing supply, the Council considers that Point A 1) provides sufficient means by which to ensure that displacement of conventional housing opportunities is not excessive. The 3 for 1 bedrooms to dwelling for the purposes of monitoring ensures that sites that do come forward for student accommodation do not place additional burdens on the Council in identifying further sites for housing.

User:	Save Swiss Cottage

H17 Purpose-built student accommodation
17.1 We propose that the following be added to this policy
• Student housing should not compromise capacity to meet the need for conventional homes (particularly social / low cost rented homes).
• New student housing should be avoided in boroughs that already have the highest concentrations: Camden, Islington, Southwark and Tower Hamlets – identified in the last London Plan and any other boroughs that may also have very high levels of studentification.
• There needs to be a way of measuring where development of student housing does / doesn’t contribute to delivering mixed and inclusive neighbourhoods.

User:	London Borough of Bromley
The Council notes the policy and the housing target contribution and welcomes the required link to a specific institution	

User:	London Borough of Bromley

The Council notes the policy. The supporting text should clarify the contribution of Large-scale purpose-built shared living to the housing target figures in line with the draft London Plan Policy H3C.

User: London Councils

London Councils supports the aim of this new policy to deliver student accommodation which contributes to mixed and balanced communities in London. It is also welcome that the draft Plan is taking a to threshold approach to student housing applications, ensuring that detailed viability information is required for schemes not providing at least a 35% affordable student accommodation.

London Councils agrees with the principal that the use of such accommodation should be only for students and linked to one or more specified high educational institutions. The policy states that if an application is not secured specifically for students, or linked to a higher education facility then ‘it should not be considered as purpose-built student accommodation or meeting a need for purpose-built student accommodation’ but instead be considered as an application for large-scale purpose-built development as set out in policy H18. While London councils agrees that student accommodation should be linked to education establishments, the demand for student accommodation is very high across London and the impacts of this policy on the availability of student accommodation will need to be monitored and altered if there is harmful effect on development.

User: London Borough of Tower Hamlets

We are supportive of this policy approach, in particular the strengthened requirement for the provision of affordable student housing and the further detail provided on the setting and operation of the affordable housing requirement.

We are also supportive of the acknowledgement of existing concentrations in central London and the policy approach to direct student accommodation away from these locations.

However we consider that ‘locations well connected to local services by walking, cycling or public transport’ should be better defined. This could be in relation to PTAL, a set distance or in relation to town centres etc. The current phrasing is too open to broad interpretation of suitable locations.

User:	Royal Borough of Kingston

The policy is supported in principle and explicitly stating that student bedrooms count as part of the housing target is welcomed. In relation to student housing (Policy H17), as noted above, RBK does not agree that student bedrooms should be counted on a 3:1 ratio. Each student bedroom is capable of meeting the needs of a household (i.e. a single student) and therefore each bedroom should be considered as a home for monitoring purposes.

User:	London Borough of Waltham Forest

We welcome this policy. We agree with purpose-built student accommodation having to provide 35% affordable student housing. We consider that there may be some practical issues with the university nomination rights and would seek further guidance from the GLA and Universities on how this will work in practice at a Borough level.

User: HFFTRA

H17 Purpose-built student accommodation

17.1 We propose that the following be added to this policy

? Student housing should not compromise capacity to meet the need for conventional homes (particularly social / low cost rented homes).

? New student housing should be avoided in boroughs that already have the highest concentrations: Camden, Islington, Southwark and Tower Hamlets – identified in the last London Plan and any other boroughs that may also have very high levels of studentification.

? There needs to be a way of measuring where development of student housing does / doesn't contribute to delivering mixed and inclusive neighbourhoods.

Additional Policy – Co-operative / community led housing.

We propose that the Mayor should

(i) work with existing, newly formed or developing London-based co-operatives, TMOs and CLTs to assess their existing and future potential (including resources and capacity) to develop new social / low-cost rented homes;

(ii) with the boroughs, identify and set aside public land that might be available to them to deliver community led housing;

(iii) with the boroughs, develop a London-wide list / online map of potential small development sites to match co-operatives / community led housing organisations with available development sites (particularly public land) for homes that will remain in perpetuity at costs that can be afforded by households of below median income levels;

(iv) provide support social housing tenants who wish to manage or collectively own their own homes.

User:	London Borough of Hounslow

LB Hounslow strongly support the clarification provided by policies H13, 14, 15, 16, 17 and H18 on other tenure types. However, consideration should be given to ensuring that policy H13 is well regulated so as to ensure they do not provide exploitative and result in poor quality accommodation and its implications on community cohesion and place making.

LB Hounslow supports this policy see above

User:	London Borough of Hackney

Hackney supports the need for provision of student accommodation to be linked to higher education institutions is welcomed and is something Hackney are requiring in emerging local policy as well. Support for temporary use of the accommodation during vacation periods is also welcomed.

User:	Westminster City Council

We do not consider the level of prescription in this draft policy to be appropriate for a strategic plan. The approach suggested in paragraph 4.17.10 is over-complex and is unlikely to be effective.

User: London Borough of Southwark

This policy conflicts with the New Southwark Plan in respect of affordable housing. For direct-let student accommodation (i.e. those which are not secured for use for a specified higher education provider) the council requires 35% conventional affordable housing and as much affordable student accommodation as is viable. For student homes secured for specific higher education providers the rooms should all be affordable and the development should provide as much conventional affordable housing as is viable. The council recommends the draft policy allows boroughs to prioritise conventional affordable housing over affordable student accommodation.

Further to the council's comments earlier regarding the threshold approach to viability, the council urges the Mayor not to open the threshold route to viability to student accommodation schemes. The economics of build to rent are fundamentally different to built for sale schemes and the Mayor should ensure there are no unknown incentives to bring forward build to rent development in place of built for sale development.

User: London Borough of Wandsworth

Whilst the Council recognises the importance of student accommodation to support educational establishments, we would expect these institutions how they have researched the local market to identify local accommodation and to evidence the need for new build. Support for BPSA would be subject to consideration of Community demands for other forms of affordable housing in the area. Any student accommodation developed must be linked to an educational establishment – the SHMA would not consider student accommodation so any application bought forward must meet very specific requirements – locally evidenced for local institutions and not at the expense of mainstream provision to meet identified housing needs.

Concern that implementation of Part A (4) could be complex –for example factoring in occupation by foreign students, availability of scholarships, sponsorships, grants and bursaries etc on affordability, subsidisation of students is best carried out by the educational establishment or local education authority on an individual basis rather than on the housing stock

User:	London Borough of Richmond Upon Thames

Support a specific policy to address PBSA. The Council recognises the importance of student accommodation to support educational establishments, however we would expect these institutions to demonstrate how they have researched the local market to identify local accommodation and to evidence the need for new build. The London SHMA may have identified an overall strategic requirement for PBSA in London however as in previous London Plans it should be recognised there remains uncertainty over future growth in the London student population and its specialist accommodation needs. The work of the Mayor's Academic Forum has recognised for example it is unknown how the UK leaving the EU will affect London's student population. It should not be assumed for needs to have stayed the same, as needs can change within a short time period, and particularly in the university sector it is understood there appears to be levelling off in student numbers (except for the Russell Universities Group) due to changes in population and international flows. The HESA figures for institutions within this borough revealed in 2015/16 approximately a 5% drop in student numbers compared with 2014/15.

It is recognised that the strategic need is not broken down into borough level targets,

however the concern that the policy lacks any recognition of priority local housing needs where boroughs land supply is so constrained, it should be assessed within the overall context of borough SHMAs. Any student accommodation developed must be linked to an educational establishment so any application bought forward must meet very specific requirements – locally evidenced for local institutions and not at the expense of mainstream provision to meet identified housing needs. The requirement for strategic need to be addressed across London could otherwise create unsustainable travel patterns for example accommodation being built in parts of the borough on the basis it will support institutions in say central and east London. There should be further clarification in paragraph 4.17.3 as to how local needs will be assessed.

The Council supports the introduction of 35% affordable student rents in principle, however object to paragraph 4.17.13 as on large sites, where affordable housing provision could be accommodated alongside student housing, this restricts boroughs abilities to secure AH in accordance with local priority needs.

User:	London Borough of Harrow

The Council support this policy and its emphasis on ensuring mixed and inclusive neighbourhoods. The ratio of 3:1 (three bedrooms counting as one dwelling) in Policy H3 addresses the potential for new student accommodation within the borough to undermine the ability to meet overall housing targets (expressed as dwellings).

User: London Young Labour

Student Accommodation

Many of our members are students living in London or recent graduates of London universities, and we are deeply concerned that the high cost of accommodation in the city is becoming increasingly unaffordable for those on lower incomes. Research from the TES, for instance, showed that in 2017, students from the most disadvantaged parts of the UK made up just 3.5% of entrants to King's College London (down from 4.8% in 2016), 3.8% of entrants to Imperial College (down from 3.9%) and just 4% of entrants to University College London (4.3%).

Accordingly, we strongly support measures for a minimum proportion of affordable bedrooms in new student developments, such as those outlined in 4.17.6, particularly 'Providers of PBSA are encouraged to develop models for delivery of PBSA in London which minimise rental costs for the majority of the bedrooms in the development'. We believe addressing the cost of affordability is crucial for tackling the cost of living crisis for students in the capital. Hidden charges are also often punitive for students in London and therefore welcome paragraph 4.17.9 which clarifies City Hall's position.

While we support the priniciple of ensuring there is a defined minimum quantity of affordable student housing (35% as outlined 4.17.6 and 4.17.8) but feel this could go further or be more clearly defined. For example, rents could be based on a calculation of living costs rather than the calculation outlined in 4.17.7 (55% of maximum income) which is in danger of being relatively low if the maximum grants available are not significantly above average.

Members also expressed particular concern about the quality of student housing, with many personally experiencing student accommodation of predominantly low quality. We strongly support the principle behind 4.17.5 but feel this could be taken further; with many developers exploiting construction loopholes to construct second-rate student accommodation. We feel that City Hall should work as closely as possible with developers in ensuring student accommodation is built to the same standards as residential accommodation.

User: London First

We have several concerns with policy H17 and the supporting text. Existing purpose-built student accommodation (PBSA) policy was only adopted two years ago in the Further Alterations to the London Plan and has not been tested to a significant extent as to its practicality and impact on development. Suggested alterations are listed below.

H17 A1: We are concerned that this policy will be used by boroughs to demand that PBSA built in their area should be linked to a Higher Education Institutions (HEIs) in their area. This will reduce choice for students in general and make it harder for central London institutions to accommodate their students. It should be removed.

H17 A2: We support PBSA being secured for students.

H17 A3: This policy is too restrictive and should be removed. Its inclusion effectively ends the current model of direct let PBSA by requiring such accommodation to secure occupation agreements with higher HEIs. It is anti-competitive, forcing direct-let private sector developers into agreements that some may not want to enter or, at the very least, unfair negotiating terms with HEIs, knowing that their occupation agreement is required for a scheme to proceed.

This policy does not reflect how higher education delivery is evolving in London. While large London universities remain the main provider, growth is coming from teaching and research establishments that are smaller, often subsidiaries of universities from elsewhere in the UK or prestigious organisations abroad.

Equally, the establishments at which students are studying are far more diverse than is perhaps perceived. Postgraduates for example, may be studying at an institution anywhere in the world, but come to London for a period of weeks or months to complete a specific piece of research. PBSA is excellent at catering for their needs.
The proposed new policy may work for large academic institutions in London, which are able to offer links to private providers. For the many smaller academic institutions, however, they will not be able to establish such links and therefore their students will struggle to access the PBSA market. We do not think that is the right direction for policy. Students should be able to choose the course that best suits their needs, devoid of any consideration as to whether they will be able to access accommodation or not.

Finally, HEIs offer accommodation to first-year students and those from overseas. This policy would mean that second-year and third-year students will need to seek accommodation in House of Multiple Occupation, regardless of levels of affordability.

H17 A4: We are concerned about the evidence to justify the requirement for PSBA to provide 35% of bedrooms at affordable income levels. Student accommodation is demonstrably different from market-sale housing and applying the same approach to affordable housing across all types of accommodation is too simplistic. We are aware of evidence submitted by Unite Students which highlights significant concerns with the viability assumptions underpinning the 35% policy. While it may be legitimate to seek some form of affordable accommodation, the current approach is likely to constrain supply and increase the cost of student accommodation for all students. The 35% requirement should be removed with applicants making an affordable contribution based on the schemes viability.

H17 B: This policy should be reworded to reduce the emphasis on developing student accommodation outside of existing concentrations in central London. While we agree that the dispersal of student accommodation should take place, it will only happen on a significant scale if HEIs develop campuses outside of central London. The policy should not therefore penalise student accommodation providers from building in the obvious location for its market. Furthermore, the policy contradicts Policy H17 A which seeks to ensure boroughs take account of both local and strategic need.

Paragraph 4.17.1: We welcome the inclusion of this supporting text which highlights the importance of PBSA to maintaining London's world-class higher education sector and the inclusion of such development to meeting London's overall housing need. This makes the introduction of H17 A3 even more concerning. Paragraph 4.17.1 should also reference that PBSA has a broader benefit to London's housing market by providing students with bespoke accommodation that matches their needs and moving them away from houses of multiple occupation.

Paragraph 4.17.3: The inclusion of the word 'local' (as below) should be removed. Its inclusion is confusing and contradicts the last sentence in the paragraph which says that there is no requirement for the HEI to be in the borough.
*To demonstrate that there is a **(delete "local")** need for a new PBSA development and ensure the accommodation will be supporting London's higher education institutions, the student accommodation must either be operated directly by a higher education institutions or the development must have an undertaking in place….*

Paragraph 4.17.7: This paragraph makes no mention in terms of the income a student could earn of part-time paid work student could earn. Some allowance for this should be made in the calculation of what an affordable living cost is.

Paragraph 4.17.12: We welcome the acknowledgement of the need for the temporary use of PBSA during vacation periods of ancillary uses.

User: Just Space

H17 Student accommodation

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

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

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

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

User:	London Borough of Bexley

The definition and provision of affordable student accommodation set out in **Policy H17 Purpose-built student accommodation** is welcomed. The new local SHMA, currently in preparation, will assess Gypsy and Traveller accommodation in the borough, and the requirement for student accommodation.

User: Kingston University

Policy H17 Purpose-built student accommodation

Kingston University welcomes Policy H17 (4) which identifies that boroughs should seek to ensure local and strategic need for purpose-built student accommodation is addressed.

The draft policy however also requires that at least 35 per cent of new accommodation is secured as affordable student accommodation and that the accommodation provides adequate functional living space and layout. These are matters of principle that are supported by the University as good quality, affordable accommodation is just as important to students, as it is for others.

The supporting paragraph to Policy H17 (para 4.17.12) notes that to maximise the delivery of affordable student accommodation by increasing profitability, boroughs should consider allowing the temporary use of accommodation during vacation periods for ancillary uses (e.g. conference delegate accommodation or interns on university placements). This approach is supported by the University, given that it will assist in supporting affordable accommodation and will also assist universities with their summer education programmes.

User:	London NHS Clinical Commissioning Group

Policy H17 Purpose-built student accommodation

Policy H17 or the supporting text should recognise the impact on healthcare services, particularly where new concentrations of student accommodation are created outside of central London. There should be a requirement for boroughs to identify the impact of existing and emerging concentrations of student accommodation and to mitigate the impact through developer contributions.

User:	Kingston and Surbiton Constituency Labour Party

We welcome the greater use of EDMOs and control of short-term lets (4.11.1) also support for specialist accommodation (Policy H14) and attempts to reduce the speculative building of student accommodation (H17).

User: London Federation of Housing Cooperatives

H17 Purpose-built student accommodation

17.1 We propose that the following be added to this policy

? Student housing should not compromise capacity to meet the need for conventional homes (particularly social / low cost rented homes).

? New student housing should be avoided in boroughs that already have the highest concentrations: Camden, Islington, Southwark and Tower Hamlets – identified in the last London Plan and any other boroughs that may also have very high levels of studentification.

? There needs to be a way of measuring where development of student housing does / doesn’t contribute to delivering mixed and inclusive neighbourhoods.

User:	Royal Holloway Students’ Union

Having read and discussed the content of the new London Housing Plan, specifically Policy H17 regarding purpose build student accommodation (PBSA), Royal Holloway Students’ Union would like to flag certain issues within the proposal. For the most part, it is both exciting and refreshing to see considerations being made for low income students, and is a welcome change in such policies. The overarching ethos is clearly in the right place, however, the nuances are somewhat amiss.

User: Royal Holloway Students' Union

Firstly, an issue that has been raised numerous times regarding the appropriateness of maintenance grants is once again raised due to point 4.17.7: , which reads:

"*The definition of affordable student accommodation is a PBSA bedroom*

that is provided at a rental cost for the academic year equal to or below 55

per cent of the maximum income that a new full-time student studying in

London and living away from home could receive from the Government's

maintenance loan for living costs for that academic year."

The issue here is not with the 55% of student income, it is instead with the use of the maximum income from a maintenance loan. Whilst low income students certainly would benefit as they are caught in this bracket, and high income students are able to rely on family subsidies, students left in the middle tiers, especially those from the lower tiers, could suffer greatly due to this.

The second issue would be with the lack of definition of a "Higher Educational Institution". A suggested option could be to consider that an HEI is defined as such due to its presence and approval on the register maintained by the Office for Students.

User: Royal Holloway Students' Union

The third issue comes from section 4.17.12, which reads:

"*To enable providers of PBSA to maximise the delivery of affordable*

student accommodation by increasing the profitability of the development,

boroughs should consider allowing the ***temporary use of accommodation***

during vacation periods for ancillary uses."

Whilst we believe that this will absolutely help with affordability, we also believe that provisions should be made for students wishing to live beyond the 38 weeks, especially international students. Longer letting periods should be readily available for all students, and priority should be given to international students for these lets. Priority should also be given to students on longer courses, to those in the future who will be studying two year accelerated courses, and to students required to work over the holiday period.

Nominations agreements, whilst offering security, favours larger developers over smaller, not for profit organisations. We would suggest providing an option for those who guarantee 100% of their rooms as affordable, in which they are no longer required to gain a nominations agreement with the university, however all other rules would still apply. We would also like to see clearer definitions of the nominations agreements, and what they would entail – we could recommend a clear, binding, hard set of agreements which would ensure the security and wellbeing of students living in the accommodation.

User:	Royal Holloway Students' Union

Finally, one concerning aspect can be found in section 4.17.8, which reads:

"*If 35 per cent affordable student accommodation is not met,*

a scheme will be considered under the ***Viability Tested Route*** *in line with*

part E of Policy H6 Threshold approach to applications and the Mayor's

Affordable Housing and Viability SPG."

We have concerns that this may be considered as an out for developers. The affordable PBSA is a crucial element of the plan, and to see it go to waste would be greatly disappointing. We believe that this 35% figure needs to be secured and guaranteed for this plan to be the success it could be.

User:	Chartered Institute of Architectural Technologists

Policies H6, H7, H8, H9, H10, H11, H12, H13, H14, H15, H16, H17 & H18

We are in agreement with the proposals contained in the plan.

User: LASAN

LASAN is generally supportive of the proposed new arrangements in the London Plan for student accommodation under H17 (pp.193-197) and understands the rationale behind it; given the nature of high end, high rent student accommodation that has been built in the capital over the last 15 years.

Ensuring PBSA (Purpose Built Student Accommodation) providers, including ‘the not for profit’ sector, which we represent, are required to work with Universities to provide new student accommodation, can not only be in the best long-term interest of both concerned, but also students.

The proposals also recognise the need to deliver a proportion of affordable accommodation in all new student accommodation, to match the incomes of some poorer students and help support thriving Universities in the capital. Something that the, not for profit sector has been delivering already, through affordable rents and bursaries.

The addition of 3500 extra rooms per year, realistically enables the capital to deliver much needed student accommodation and take students away from HMO’s.

User:	LASAN
Full comment - see attachment	

User: LASAN

1) Regarding the need for a nomination agreement, para **4.17.3** ‘the development must have an undertaking in place from initial occupation to provide housing for students at one or more specified higher education institution’

i) The requirement of a form of nomination agreement with a University or Universities by the PBSA sector, offers little for charitable/not for profit providers, as the likelihood is that Universities will engage with large existing providers in delivering new accommodation. The policy naturally gives advantages to large established universities and large established PBSA providers. As the charitable/not for profit sector is relatively small this, puts this sector at a disadvantage and will not encourage its growth. This proposals, will lead to a lack of competition and diversity of student accommodation provision in London.

ii) The policy may mean that smaller specialist University institutions in London will struggle to get access to PBSA, as they will find it harder to be able to enter large financial agreements.

iii) The policy does not determine the nature of the nomination agreement, it seems to imply local authorities determine this at a local level, this needs clarification.

iv) There are a myriad of forms of nomination agreements and there are advantages and disadvantages to both Universities and developers/operators of applying soft or hard nomination agreements (in effect leases). For example, if a University can show an ‘on balance sheet’ nomination agreement, for more than 7 years with a developer a building it becomes exempt from CIL.

For Universities a soft nomination keeps it off the balance sheet, means there is little financial commitment on their part.

Hard nominations are generally what PBSA would want, but universities have difficulties committing and putting on their balance sheet. Universities generally want to see the accommodation built, and delivered on time, before a hard nomination commitment.

A policy suggestion to ease the problem would be if **the PBSA could get through planning, by a soft nomination or letter of comfort and then look to enter a hard nomination agreement with a University when the building is built.**

The proposals talk about a an ‘ undertaking in place from initial occupation’ for how long? It also states ‘that the development will continue to maintain a nominations agreement’ what happens when agreement ends or if there is a dispute. It then goes on to say ‘for as long as it is used for student accommodation or such time period as the borough deems appropriate’ what happens if the deal finishes and no higher education establishment wants to enter into a deal with the PBSA and the Borough says it still wants it to be used for student accommodation, how is that going to work?

We would therefore propose that the nature of the nomination agreement, the role of the LPAs (Local planning authorities) and what happens at the cessation of any agreement should be clarified in the SPG (supplementary planning guidance) following the adoption of the proposals.

User:	LASAN
There needs to be a clear definition of a University, what is a specified institution, as lines are being blurred in this sector with new entrants. Also, to avoid confusion, there needs to be a definition of what is PBSA, how large does a building have to be, 25 student rooms?	

User: LASAN

Regarding **summer use**, para 4.17.12, this usage is servery restricted. Summer usage should be as wide as possible allowing student accommodation to be used for many purposes. Many existing PBSA, Charitable providers and Universities rent rooms to language schools, tourists and people working in London over the summer. This benefits the London economy, ensures that buildings are used instead of remaining empty, employs staff over the period. It benefits students by enabling providers to offer cheaper rents during term time and not forcing them to sign up to 50 week contracts. The proposals in the Draft London Plan are so restrictive that it could have buildings empty, for approximately three months of the year making it impossible to deliver affordable rents.

User:	LASAN

Regarding 4.17.6 it states ‘Providers are encouraged to develop models of delivery of PBSA in London which minimise rental cost for the majority of the bedrooms in the development and bring these rates nearer the rate of affordable accommodation’ We are supportive of this, but it is not achievable because, unless the development is classed as a ‘dwelling’ under HMRC rules, i.e. a cluster flat or studio, it becomes liable for VAT on build costs. If you wished to develop, for example a hostel style model, with small single rooms, which could be cheaper, then the development will fall under the RRP rules (Relevant Residential Purpose), under that rule to be able to be VAT free on build costs, it must be used for 95% of the time for student accommodation. This then of course conflicts with the need to provide 38 week contracts on affordable rooms, as you would not be able to offer rooms out for alternative use in the summer and the building would not be viable.

User: LASAN

The student housing charitable sector in London would like to **propose** an additional approach to supplement what is being proposed in the London Plan.

If you provide new PBSA and the whole building, every room is affordable (under the Mayors criteria) on an ongoing planning covenant, then it does not have to have an undertaking by a University. This building would still need of course to meet all the space planning requirements for single rooms. This we believe would encourage the Charitable/Not for profit sector, as affordability is at the heart of the sectors charitable aims. A charity might want to deliver all the rooms at an affordable level and might, in the shortterm subsidies a new building from existing stock, that it has had for some time. This proposal gives this embryonic sector the freedom to do it alone, without University involvement. We cannot see any downsides on this proposal, the allocation is simple as all the rooms are affordable, it encourages the building of affordable rooms, encourages innovation and probably dispersal from the centre. It’s not dissimilar from how it works for housing associations and social housing sector, in fact it might encourage some of them to enter this market.

We would therefore propose that where 100% of the rooms in the student development meet the affordability criteria there will be no need for a nomination agreement with a University.

User: British Property Federation

We are pleased to see that the substantial contribution London's universities make to the economy is recognised in the draft plan. The sector contributes directly (through fees, accommodation and student spend), indirectly (e.g. provision of skills) and retrospectively (e.g. employment) to the economy and requires clear policy guidance to encourage Boroughs to positively plan for this sector. We are therefore pleased that the housing requirements of students in London have been recognised as an important part of meeting London's overall housing need. We believe that new student schemes should be built close to good transport links across all London boroughs, including new emerging locations, to match student numbers and lessen the pressure on the capital's residential housing stock.

The following policy however, we believe, needs amending:

"the student accommodation must either be operated directly by a higher education institution or the development must have an undertaking in place from initial occupation, to provide housing for students at one or more specified higher education institutions" (194)

As stated above, London has insufficient purpose-built student housing in comparison with its student numbers, which puts significant pressure on the capital's residential housing stock. We are therefore concerned that this draft policy will particularly limit access to purpose-built accommodation for students attending smaller institutions. The higher education system is dynamic, constantly changing and is no longer just focused on large, well-established universities. The number of smaller institutions is growing, they rarely have housing of their own and they lack the financial resources and expertise to invest the significant time required to partner with developers in respect of a specific purpose-built student housing development. Furthermore, developers are unlikely to engage with these smaller providers through the planning process if underwrite levels amount to only low numbers of beds. Conversely, smaller PBSA operators will not have the capacity to develop schemes appropriate for large Higher Education Institutes. The draft plan could therefore severely restrict the number of students from smaller institutions living in purpose-built student housing, putting more pressure on the conventional residential housing stock. Fundamentally, this draft policy is too narrow, biased towards large HEIs and large suppliers and is likely to diminish the emergence of new purpose-built student housing schemes.

A further issue with this policy is that it does not explain what constitutes a nomination agreement. We would welcome clarity about whether this is an agreement that local authorities determine at the local level. Higher education providers may be reluctant to make binding arrangements prior to planning approval given the subsequent changes to design and massing that can occur later in the process. The draft plan is also silent on length of term and what percentage of beds within a scheme constitute an “undertaking”. Accounting treatment considerations force HEIs, who need agreements to be off balance sheet, to introduce break clauses or room hand-back provisions, which enable them to mitigate demand risk and comply with Higher Education Funding Council rules on lease liabilities. It is therefore essential that a lower test than a full legal undertaking, pre-planning, is applied and that PBSA owners and operators do not breach planning if such agreements naturally lapse or demand from an institution reduces and agreements need renegotiating later.

A final issue with this policy concerns VAT. There are two ways in which student accommodation can qualify for VAT reliefs. One is to ensure the accommodation qualifies as ‘dwellings’, however there are conditions for this, particularly around the terms of planning, which envisage accommodation being for students at specified HEIs. The alternative route to VAT relief is to ensure that the accommodation is intended for at least 95% student use. However, as PBSA relies on substantial non-student use during student summer vacations for financial viability purposes (as acknowledged in the plan- 4.17.12), this exemption is not feasible. In HMRC’s current view, the policy will be understood that accommodation which links to specified HEIs will be unable to qualify for zero-rating VAT reliefs (and other reliefs) as ‘dwellings’. This is likely to result in a substantial increase in development costs, by up to 20%, and therefore private sector developers are likely to pursue other opportunities, perhaps in other cities. We would suggest that the GLA needs to engage with HMRC on this issue, and that any comfort that HMRC can offer needs to be published.

The following policy also needs to be reviewed in our view:

“*a proportion (35 per cent) of bedrooms in PBSA are required to be affordable at this income level*” (195)

The categorisation of ‘affordable’ here needs addressing. It is unclear why affordability is being linked to personal ‘income’ rather than to a percentage of market rent. Student income is largely subject to government policy and not the economic realities of developing student accommodation in London.

While the concept of affordable student housing is of course laudable, we are concerned that such a policy will further constrain the development of private PBSA in London and as such have a negative impact on the total provision of student accommodation, which is still very scarce in the capital. Imposing affordability quotas on developers is likely to lead to the supply of PBSA being constrained, which will apply further pressure to the capital's wider housing stock. A market without such restrictions will encourage an increased supply of PBSA, which will lead to a wider range of products being created to satisfy a range of location, price and quality needs. We see that rent levels will ultimately respond to supply with downward pressure created by a healthy pipeline of new development. Rents, and more especially, tenancy agreement lengths, have respectively flattened and shortened in markets such as Wembley where PBSA competition is now significant.

We ask the GLA to clarify whether the 35% affordability threshold is intended to apply to the intensification of existing student schemes as well as the development of new schemes. From a planning perspective, intensifying existing schemes provides a valuable, potential fast-track to growing PBSA in London and should be excluded from affordability requirements. This will avoid these schemes having potentially very small and difficult to administer percentages of affordable units.

We also ask the GLA to clarify why the affordable housing threshold is now applicable on all PBSA, even when nominations have been agreed. The current London Plan only seeks affordable housing where the nomination is not agreed. We would like to know what has changed in the short time since the last update to the London Plan and what evidence base has been provided which means that this element of the policy is now justified.

The two policies specified above, especially when combined, are likely to severely constrict the development of PBSA at a time when London's student numbers significantly outweigh the number of purpose-built student units, and while London's wider housing landscape is going through a shortage. Meanwhile, and by way of contrast, Nottingham City Council has encouraged PBSA investment in the city centre to match their student demand, lessen pressure on traditional houses being converted to HMOs and to ultimately improve their housing provision[1]. This has led to the creation of 1787 PBSA bed spaces over the last three years, freeing up many existing homes for the wider residential market, improving affordability and easing their housing shortage[i]. The development of PBSA has also improved Nottingham's economy as it has led to more students living in the city centre who in turn have supported struggling shops and businesses[ii]. Nottingham serves as a good case study and exemplifies a strategy which local authorities in London could adopt, via a London Plan policy, to ease their own housing shortages and regenerate areas.

We believe, schemes in London, which can demonstrate that they can directly link with a higher education provider, should have the 35% affordability requirement removed.

We believe that where 100% of the rooms in the student development meet the affordability criteria, there should be no need for a nomination agreement with a university.

We are pleased that the Plan acknowledges the need for temporary alternative summer use of accommodation. However, this should be drawn as widely as possible, allowing student accommodation to be used for many types of occupation. This would allow the accommodation to potentially help reduce overall cost of term time rent and thus meet affordability requirements. The current Plan wording is too restrictive and could result in empty rooms in the summer and therefore increased term time rents.

The plans specify that new PBSA developments should double their bicycle allocation to one space per room, and while the notion is laudable, the demand is not there to justify the significant burden this will have on development. Strong evidence shows that the vast number of spaces in basement areas are not being used[iii] and many operators are in discussion with local authorities about re-purposing such spaces. Covered cycle storage is created at the expense of other amenities that are in much better demand, and thus there should be no increase in requirement. We also believe the Plan should encourage innovative spatial alternatives to the simple “one hoop per resident” policy such as double-racking, folding bike allocations and free membership of cycle hire schemes. These latter two, for example, should permit the developer to remove the requirement altogether.

We would also ask that PBSA is clearly defined in the plans. This is to avoid confusion about how large the building should be and how council tax gets categorised.

[1] The number of full-time students living in the City is 46,000 (an increase of nearly 20,000 since 2001) with students making up 15.0% of the City’s population. (*Nottingham City land and planning policies. Sustainable, Inclusive and Mixed Communities. Background Paper. September 2013*)

[i] Unipol Student Homes data, 15th December 2017

[ii] http://www.nottinghampost.com/news/nottingham-news/one-12-homes-classed-student-344296

[iii] Unite Data- Appendix A; IQ survey finds a low level of bike usage with residents in their schemes.

User: Watkin Jones Group

Policy H17 Purpose-Built Student Accommodation

The encouragement for the development of purpose-built student accommodation is welcomed by the Watkin Jones Group. In addition, the counting of student accommodation towards housing completions is also supported as this is in accordance with planning practice guidance contained within the NPPG (paragraph 021 Ref: ID: 2a-021-20150326) which states that “Local planning authorities should plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus. Student housing provided by private landlords is often a lower-cost form of housing. Encouraging more dedicated student accommodation may provide low cost housing that takes pressure off the private rented sector and increases the overall housing stock.

The Watkin Jones Group is one of the UK’s largest developers of purpose built managed student accommodation (who typically forward sell during the construction period to an institutional investor). We are increasingly developing on sites that have previously been allocated for residential development but, due to the constraints of that site both physically and commercially, they do not work for Class C3 residential development. The use of these sites for purpose-built student accommodation also allows for a more efficient use of the site, aligning with other policies in the London Plan. This enables local authorities to have more flexibility and consider which form of residential development is more appropriate for a site and ultimately could lead to the delivery of more student accommodation (if the delivery of schemes was not hampered by the other policies which are proposed).

In terms of the individual provisions of the policy, we agree and support Points 2 and 5 of Part A and also much of Part B of the draft policy. However, notwithstanding our general support for the policy overall, Watkin Jones Group do have considerable concerns in relation to some provisions of the policy and these are dealt with below:
Firstly, with regards to Point 1 of Part A of the policy we would like to see some clarification on a definition of a mixed and inclusive neighbourhood. Many local authorities become hung up on the potential studentification of certain areas and have differing ideas on what level of student accommodation is acceptable in creating the ‘mythical’ balanced community. It should also be noted that recent case law has proven that successfully managed student accommodation schemes are no more likely to cause additional noise and disturbance to an area than more traditional residential schemes.

Secondly, Point 3 of Part A of the policy requires that student accommodation is secured for occupation by members of one or more specified higher education institutions. We do not agree with this provision that partnerships between universities and developers should be in place before a scheme can be considered/determined. The reasons we disagree with this provision are set out below:

• The provision will lead to direct let developments being forced out of the market. Direct let schemes are a vital part of the student accommodation market and they add to the mix of products available on the market. As with other members of society, students seek variety in the properties and tenures available at differing price ranges.
• The Watkin Jones Group have progressed and are constructing schemes for purpose-built student accommodation since the current adopted student accommodation policy was introduced, these schemes being supported by universities. It is our experience, and indeed the experience of other developers, that the universities will only show interest before an application is determined, and this interest will only subsequently be secured once planning permission has been granted for the development and the intricacies of the development have been ironed out. Therefore, this policy approach does not work from a commercial point of view and will scupper a host of suitable developments from coming forward ultimately having a negative impact on the supply of student accommodation.
• Furthermore, this policy approach will ensure that universities will effectively be able to reduce the amount of money that they can offer to purchase schemes or provide as rent through nominations agreements as they will be aware that developers need these to obtain planning permission for a student accommodation development in the first place. This could very easily impact upon the student accommodation market in London as a whole and result in the impact of student accommodation developers pulling away from London completely.
• Finally, these unnecessary additions to policy will result in a reduction of the amount of student accommodation being delivered across London, which is contrary to the London Plan requirement for further purpose-built student accommodation. A further impact will be that there would be an increase in rents and ultimately the supply becoming stagnant, this is again at odds to the desire of the Mayor to provide affordable student accommodation in the capital.

With regards to Point 4 of Part A of the policy, it is our belief that the provision of affordable student accommodation should only be required on a direct let scheme and subject to a viability assessment if less than 35% affordable student accommodation is proposed. In addition, if a university is linked to the scheme then no affordable student accommodation should be required as per the existing policy situation. The requirement for a university link and the provision of affordable student accommodation would be a double-whammy on student developers and would unduly impact the viability of the majority of schemes which would subsequently impact on the supply of purpose-built student accommodation.

In relation to Point B of the policy, we support much of this policy apart from the last sentence which alludes to the fact that student accommodation should be away from existing concentrations in Central London and as part of mixed-use regeneration and redevelopment schemes. We do not agree that student accommodation schemes should always be part of a wider mixed-use regeneration or redevelopment scheme. There are a range of sites that could be suitable for the provision of stand-alone student accommodation in areas that are perfectly acceptable for such developments.
In addition to the above, we consider that the fast track approach should be available for student accommodation developments, this would ensure that there is consistency across the range of residential development types.

User:	Watkin Jones Group

Finally, we support the Mayor's statement within the policy's supporting text at 4.17.13 which states that "*Where a PBSA development meets all the requirements of part A of Policy H17 Purpose-built student accommodation boroughs should not require on-site provision of, or a contribution towards, conventional Use Class C3 affordable housing*". We are aware that some of the London boroughs (e.g. Southwark) have required that purpose built student accommodation provide Class C3 affordable housing. Any such requirements should be removed (if schemes are genuinely restricted to occupation by students), to prevent any potential for a double whammy of affordable housing and affordable student accommodation being provided by a student accommodation developer.

User: London School of Economics

Residential accommodation is a critical consideration for virtually all students of the LSE when weighing up offers from global universities that are competing for their talent. If the LSE is to attract the very best students and researchers, we must be able to offer them a very high standard of accommodation that is commensurate with the likes of MIT, Harvard and the Oxbridge colleges. Our most popular accommodation is our own stock which we manage ourselves as opposed to halls where we have a nomination agreement. Our research has shown that this must be less than 30 minutes walk of our single campus. We feel that there is a lack of clarity in policy H17 (B) which suggests that new student accommodation should be outside Central London. Similarly, there is no indication of what the characteristics of a 'concentration' might be. The LSE exists largely within the Central Activity Zone (CAZ) and it is difficult to imagine an over concentration of student accommodation given the intensity of other land uses.

We support draft policy H17A (3) that student accommodation must be secured for occupation by students of specific higher education institutions. This can relate demand from education establishments to appropriate supply of accommodation. It has also been a frustration to institutions to see supposedly student accommodation being rented to other groups, in some instances despite legal agreements intended to counter this. Given the number of Central London higher education institutions, any specialist student housing provider will have a highly competitive market to select a partner from, should that be a concern. We also support the inclusion within the text that multiple higher education institutions could have nomination agreements within one building. This would allow smaller or specialist institutions to secure accommodation.

We are supportive of para 4.17.12 which identifies the importance of higher education institutions having the flexibility to use student accommodation for temporary uses during vacation periods.

Similarly, we welcome the firm clarification in paragraph 4.17.13 that conventional C3 affordable housing is not required to be delivered as part of a purpose-built student residential accommodation development.

With regards to policy H17 which has an expectation for delivery of affordable student accommodation on all sites. The LSE is generally supportive of this policy aspiration. The LSE spend the highest percentage of its higher fee income on access initiatives including bursaries than any other Russell Group university. Therefore, access to higher education is not merely a question of accommodation costs and a wider understanding of the efforts that a university chooses to implement is needed. Whilst we are fundamentally in favour of delivering affordable student accommodation that encourages a socially diverse range of students, we have previously clarified the importance of our central location to achieving the draft plan's objectives but this locational need comes at a considerable cost given competing land values. It is consequently not feasible to set such a specific expectation for affordable student accommodation on every scheme when the rental levels required to make a scheme ‘stack- up’, will have a significant variance between sites within Central and Outer London. We acknowledge the availability of the Viability Tested Route but the policy needs to recognise the circumstances of centrally located institutions explicitly within the text and make note of the likelihood that they may require greater flexibility.

User: Benhill Residents

We propose that the following be added to this policy

• Student housing should not compromise capacity to meet the need for conventional homes (particularly social / low cost rented homes).
• New student housing should be avoided in boroughs that already have the highest concentrations: Camden, Islington, Southwark and Tower Hamlets – identified in the last London Plan and any other boroughs that may also have very high levels of studentification.
• There needs to be a way of measuring where development of student housing does / doesn't contribute to delivering mixed and inclusive neighbourhoods.

Additional Policy – Co-operative / community led housing.

We propose that the Mayor should

(i) work with existing, newly formed or developing Londonbased co-operatives, TMOs and CLTs to assess their existing and future potential (including resources and capacity) to develop new social / low-cost rented homes;
(ii) with the boroughs, identify and set aside public land that might be available to them to deliver community led housing;
(iii) with the boroughs, develop a London-wide list / online map of potential small development sites to match cooperatives / community led housing organisations with available development sites (particularly public land) for homes that will remain in perpetuity at costs that can be afforded by households of below median income levels;
(iv) provide support social housing tenants who wish to manage or collectively own their own homes.

User: Elaine Chambers

H17 Purpose-built student accommodation

We propose that the following be added to this policy

· Student housing should not compromise capacity to meet the need for conventional homes (particularly social / low cost rented homes).

· New student housing should be avoided in boroughs that already have the highest concentrations: Camden, Islington, Southwark and Tower Hamlets – identified in the last London Plan and any other boroughs that may also have very high levels of studentification.

· There needs to be a way of measuring where development of student housing does / doesn't contribute to delivering mixed and inclusive neighbourhoods.

User: Earls Court Public Sector Tenants' Assoc

We propose that the following be added to this policy: Student housing should not compromise capacity to meet the need for conventional homes (particularly social / low cost rented homes).

- New student housing should be avoided in boroughs that already have the highest concentrations: Camden, Islington, Southwark and Tower Hamlets – identified in the last London Plan and other boroughs that have high levels of student flats.
- There needs to be a way of measuring where development of student housing does / doesn’t contribute to delivering mixed and inclusive neighbourhoods.

User: University College London

Policy H17 Purpose-built student accommodation

UCL welcomes the addition of the point 4(a) in Policy H17, which requires that “at least 35 per cent of the accommodation is secured as affordable student accommodation”. UCL considers it vital that accommodation does not ever act as a barrier to higher education, and therefore recognises the need for this requirement.

UCL guarantees accommodation to all first-year undergraduates and first year postgraduates. This guarantee is considered as an essential component of UCL’s offer to attract the best students, both from the UK and abroad. Other major universities within the UK also offer this guarantee and it is imperative that this guarantee is maintained.

UCL has experienced significant growth in student numbers in recent years. Over the last four years (2012/13 to 2016/17) undergraduates have increased by 3,515 (+24%), and postgraduates by 3,187 (+27%).

Significant growth of student numbers is forecasted to continue, as set out below.

Student Type	Student numbers in 2016/17	Forecasted numbers in 2021/22	% Increase
Undergraduate	17,582	19,163	8.25
Postgraduate	20,951	23,651	11.42
Total	38,533	42,814	10

It is essential that UCL continues to increase its student accommodation stock to accommodate expected growth and maintain its guarantee to new students.

User: Queen Mary University of London

Student Accommodation

QMUL is aware of the ongoing housing pressures within London and of the Mayor's commitment to increasing the provision of housing (c. 66,000 per annum), particularly affordable housing and a range of other housing products. The London Plan is supported by a Strategic Housing Market Assessment ('SHMA') which covers all housing need across London and specifically includes requirements and housing figures for Purpose Built Student Accommodation ('PBSA').

QMUL are supportive of the acknowledgement within the London Plan relating to the role that higher education institutions have in terms of their contribution to London's economy and labour market.

Through their own research QMUL have identified the significant detrimental impact that a lack of suitable and affordable student accommodation can have on their student intake. QMUL have clearly identified that the ability to attract the best students is reliant upon the ability to guarantee new students an offer of high quality student accommodation in close proximity to teaching and ancillary student spaces. As a result of the growth in student numbers the University now has an immediate need for at least 1,000 additional bed spaces. Therefore, QMUL welcome the introduction of a standalone policy which addresses the key elements of the provision of student housing. Whilst QMUL welcome the commitment to student housing set out in the Draft London Plan, they do have some concerns relating to specific elements of the proposed policies, specifically with regards to the requirement to provide affordable student accommodation.

Policy H3 (Monitoring Housing Targets) sets out that "net non-self-contained accommodation for students should count towards meeting housing targets on the basis of a 3:1 ratio, where three bedrooms will count as a single home." Whilst QMUL understand that the provision of student housing is a key component of London's overall housing need, we would suggest that flexibility should be built into this policy, so as to not unduly impact upon the growth and development aspirations of University's across London.

QMUL have concerns that they would be restricted by strategic policies which seek to resist the loss of housing across London. Student accommodation forms a fundamental component of their estate, and in some circumstances surplus or poor-quality student accommodation is being re-purposed to create teaching and support space to facilitate the growth of the University. Therefore, where bedspaces are lost in this manner there would be significant restrictions which could unduly restrict QMULs delivery of higher quality facilities across their Estate.

Therefore, given the strategic nature of the policies, it is considered that reference is made in the supporting text regarding the loss of student accommodation and where appropriate to student accommodation that can be lost where justification exists for the loss and the re-provision of an alternative floorspace.

As abovementioned QMUL welcome the introduction of **Policy H17** (Purpose Built Student Accommodation) which provides support for PBSA and acknowledges the contribution that higher education institutions make to the economy and labour market. QMUL support the principle that the accommodation is secured by members of one or more specified higher education institutions and the encouragement of developing student accommodation in locations well connected to local services by walking, cycling and public transport, especially in relation to their aspirations and opportunities for students, however, there is acknowledgement that some flexibility will be required in order to not unnecessarily delay the supply. QMUL welcome further engagement with the GLA to ensure that PBSA is secured to meet the needs of its students, is of high quality design and in highly accessible locations in close proximity to existing campuses and facilities. As such it is considered that Part B should be amended to have less emphasis on developing student accommodation outside of existing concentrations in central London. There are many co-location benefits from locating student accommodation near to teaching and research space.

QMUL would seek clarity on Policy **H17 Part A5** insofar as they would like to understand whether there will be standards adopted to control and guide the design and development of student accommodation to meet the changing needs of students. Should there be a specific design approach QMUL would happily engage with the GLA on this matter. For example, it is considered that national space standards would not be appropriate for the design of student accommodation given the temporary nature of residents.

QMUL acknowledges the need to ensure that a percentage of affordable student accommodation is provided for, and QMUL are themselves committed to ensuring that their own student accommodation is provided at different price ranges including a level which is affordable. This, is more apparent and achievable where they are able to develop their own campus and land holdings to provide additional student accommodation. Whilst there is an overall support for this direction in terms of providing a level of accommodation that is affordable, there is a concern about the level which has been set at 35% and the basis of the affordability.

The draft Plan sets out that the affordable level for student accommodation should be set in the ‘Annual Monitoring Report’ (‘AMR’) for the previous year; as such for the academic year 2017/18 the annual rental cost for affordable PBSA must not exceed £6,051 per annum. This equates to the following weekly rentals for a 38-week rental period this equates to c. £159.00 p/w. for a 51-week let on a student accommodation unit this equates to c.£118.00p/w. Whilst QMUL understands and supports the need to ensure that student accommodation is affordable it does not consider that the level set out in the Annual Monitoring Report (‘AMR’) is an achievable price especially for new building taking account of development and operational costs. Further QMUL would not want within its own developments to effectively have to adopt policies that created differential price points, so that the development as a whole could support 35% of the rooms being made available at the AMR target.

QMUL have significant concerns surrounding the achievability of delivering high quality student accommodation which would be inclusive of 35% affordable at the levels set out above and therefore the impact which this could have on the deliverability of stock to meet growth levels.

At present QMUL estimate new student accommodation costs not less than £95,000 per room, and given current borrowing rates, this equates to a cost of capital of circa £4,300 per annum. QMUL spends upwards of £1,800 a year operating a student room. Accordingly, before allowing for land costs, repayment of capital, planned long term maintenance and renewals and depreciation, a room costs over £6,000 a year. QMUL offer undergraduates 38 week tenancies, and aim to let the rooms in the summer period for approximately 6 weeks. Even if QMUL undertake development on its existing land holdings and put the land cost in as zero, it could not afford to build new residences and let them at the target levels set out in the current AMR.

User:	Queen Mary University of London

Secondly, in relation to Student Accommodation, again QMUL are supportive of the introduction of Policy H17 (Purpose-built Student Accommodation) and its commitment to ensuring that local and strategic need for PBSA is addressed, however they do have concerns relating to specific elements of the policy wording. Their main concern relates to the provision of 35% affordable student housing, and how these levels are set at a London level, where Universities are providing long-term lets on their student housing the current affordable levels are considered to be unachievable and could be detrimental to the delivery of high quality student accommodation.

User: Natalya Palit

In policy H17 consideration should be given to embedding expected minimum design criteria that should be applied to the provision of student accommodation. Case law sets dangerous precedents for the quality of accommodation that has historically been considered to be acceptable (for example the permission granted by a planning inspector at 465 Caledonian Road). This goes against the principles of the plan which aspires to achieving an equal and good quality environment for all. It is important to recognise the value of students as citizens of this city. There is significant evidence to show that mental health issues can be a particular concern in student populations and thus a commitment to quality, including good ventilation and daylight and sunlight levels within accommodations should be a requirement.

User:	London Borough of Newham

Policy H17 Purpose-built student accommodation

LBN are broadly supportive of the draft policy and consider that it does not contravene the current local policy position which seeks to deliver student accommodation, where need can be demonstrated. The strengthening of policy in terms securing affordable housing is welcomed, however if this is to be benchmarked at a 35% minimum, further detail should be added into policy allowing for flexibility at a local level

User:	London Borough of Sutton

SUPPORT. The London Borough of Sutton notes Policy H17. Whilst the Sutton SHMA did not identify a need for student accommodation in the borough the council welcomes the contribution it can make to housing targets. The council supports the requirement of Policy H17 to link student accomodation to specific higher education institutions.

User: Imperial College London

The draft policy makes no distinction between higher education authorities trying to deliver accommodation for its students and schemes undertaken for profit by developers. Whilst it is appreciated that in land use terms it may be difficult for the London Plan to make a distinction, the reality is that funding resources are scarce and it is already difficult to provide the accommodation that students need.

Imperial College London supports the new requirement that purpose-built student accommodation must be operated by a higher education institution or a developer must have an undertaking for a specified higher education institution. However, it considers that the determination and provision of affordable student accommodation should rest with higher education institutions themselves, as they are best placed to take account of the allocation of the varying rents and costs that are applied across a significant portfolio (over 3500 beds in Imperial's case), in order to ensure that provision of student accommodation is financially sustainable in perpetuity. Imperial College London and other universities already offer a range of financial measures to help those in need. As such, Imperial College London objects to the requirement for 35% of student bedrooms in purpose built student accommodation provided in a development to be affordable. It should be noted that the provision of student accommodation is of benefit in itself. Not only does it help to attract the best students from around the world, which has a longer term benefit for Imperial College London and the UK, but purpose built student accommodation that satisfies this specialist area of housing need, also frees up more traditional housing stock that would otherwise be occupied by students, thereby providing additional homes for others.

Imperial College London also requests that the draft wording in paragraph 4.17.12 is amended. It rightly says that boroughs should consider allowing the temporary use of student accommodation during vacation periods for ancillary uses and gives the example of providing accommodation for conference delegates or summer students. It is not always possible to fill student accommodation from these sources alone. Imperial College London therefore requests that the wording be expanded to include general short term lets. This would ensure best use is made of all accommodation, rather than it lying empty for long periods of time. This would accord with Policy E10 paragraph 6.10.4, where it is acknowledged that “the use of student halls as visitor accommodation during university vacation periods can help meet seasonal fluctuations in demand.” This would also serve to assist in keeping short term let provision away from the supply of conventional housing and minimise impacts on traditionally residential areas, by increasing the supply of an ideally-suited form of accommodation for short term lets at times which will not compromise the academic calendar.

User: Imperial College London

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User:	London Borough of Ealing
The Council supports this policy.	

User: King's College

In terms of Policy H17 which deals with PBSA, King's is potentially in a unique position to comment being a developer, funder and occupier of both its own student accommodation and that provided via Nomination Agreements by the private sector. Whilst many private sector providers will object to the provision of 35% as affordable student accommodation, from a students' and HEI's point of view it is to be welcomed unless it prevents the private sector from providing PBSA. Whether the suggested rental level of approximately £160 per week is sustainable is also questionable because in order to achieve this it is likely that the remaining 65% would have to be at considerably higher levels in order for private sector developers to secure sites against other competing uses. An alternative approach would be for the basis of the affordable rents to be set as a percentage of open market rents in any particular location, thereby removing a direct political influence on rents.

Another concern with Policy H17 relates to the need for the occupation of the accommodation to be secured for students of one or more specified higher education institutions, where the accommodation is not managed or operated by a higher education institution. If this is required at planning application stage it could mean a commitment some 3-4 years before the development is capable of occupation. This is considered onerous for the majority of higher education institutions particularly smaller institutions unless the Nomination Agreement could be with an overriding institution such as the University of London acting on behalf of all HEI's in London and not simply its constituent Colleges. The earliest any commitment should be required is at the grant of a planning permission via the Section 106 Agreement. It would be more preferable to link any commitment to simply be prior to any occupation of the completed development.

Whilst the narrative around the Policy H17 encouraging boroughs to allow temporary use of the accommodation is to be welcomed in principle, there are concerns from that it will lead to more or all of development costs being subject to VAT, either because it would mean student use being less than 95% or there was a limitation on who could occupy the student accommodation. This will simply lead to an increase in rents as neither students or HEIs will be able to recover all of the VAT.

User:	National Union of Students

Overall we agree and support the policy aims on purpose-built student accommodation (PBSA) as set out in the consultation. We are supportive of the need for 3,500 PBSA bed spaces to be provided annually (section 4.17.2)

Overall, we strongly welcome the Mayor’s efforts to increase the supply of purpose built student accommodation in the Capital and to ensure affordable accommodation is available in sufficient amount, and allocated to students that are in the greatest need.

User:	National Union of Students

We are supportive of the principals involved in defining and calculating affordable student rents in London (4.17.6 and 4.17.7).

Our support for the definition of affordable student accommodation is conditional on the understanding that the calculation used to determine an affordable rent (55% of the maximum amount of maintenance loan available) is based on an average contract length of 38 weeks. It is the short-term nature of student rental periods (namely 38 weeks out of 52), as well as the inclusions of utility and service costs within the rent, that allows for a higher income ratio threshold, of 55%, to be considered as an affordable rent.

User:	National Union of Students

6.a Section 4.17.3 – Specified HE Institution
We support this policy but a definition is needed for a higher education institution or provider. This should be a body which is listed on the proposed register to be drawn up and maintained by the newly constituted Office for Students (OfS). The OfS will be operational from April 2018 replacing the current Higher Education Funding Council for England.

User: National Union of Students

6.b Section 4.17.11 – Nominations Agreement

In our opinion the higher education institutions, students and developers in London would be better served if there was more detail in this section of the policy. Given there are a range of types of nomination agreements, will the nature of an agreement be determined by local authorities determine at a local level?
The policy may mean smaller specialist HE institutions in London (nearly 30% of mainstream HE institutions) will struggle to gain access to PBSA, as they will find it harder to enter into large financial agreements with developers or HE consortia.

We therefore propose several aspects need to be clarified in any subsequent Supplementary Planning Guidance (SPG), including the nature of a nomination agreement, the role of local planning authorities, and options/consequences following the cessation of any agreement.

User:	National Union of Students

6.c Section 4.17.12 - Alternative Uses

We support the broadest possible use of PBSA over the summer in order that the income generated from that activity can be used to offset the lower rental income achieved from rooms offered at an affordable rent.

However, our support for this is predicated on the understanding that students who have a need for a longer tenancy or accommodation contract that extends beyond 38 weeks, for example students estranged from their families, care-leavers, healthcare students, international students, and students on two-year accelerated degrees, are given priority and are able to reside in their accommodation without disruption or financial penalty.

User: National Union of Students

Additionally, we support the proposal from the student charitable housing sector in London as follows; If an organisation provides new PBSA and 100% of the rooms are offered at an affordable rent (under the Mayor's criteria) on an ongoing planning covenant, then it does not have to have an undertaking by a University prior to its development. The building would still be required to meet all the space planning requirements for single rooms, as well as all other relevant regulatory requirements. We believe this would encourage the charitable/not for profit sector to develop PBSA, as it would be in keeping with their charitable aims. This proposal gives this embryonic sector the freedom to develop, without the limitation of a mandatory arrangement with University, which may be hard to secure for a new entrant to the PBSA sector, or a smaller provider. We believe this measure would encourage the building of affordable rooms, encourage innovation in building design and potentially lead to dispersal of accommodation from the centre of London. The model is comparable to that in the social rented sector for housing associations and may encourage similar organisations to enter the PBSA sector.

Finally, we would like to point out that higher and further education institutions, and their Students' Unions, can have an important role in local communities and regeneration plans, not just from their direct economic impact but also through social, community and cultural activities and interactions with local businesses for skills training and knowledge exchange.

User:	Unite Students

Draft London Plan Policy H17 (Purpose-Built Student Accommodation) states:

A. Boroughs should seek to ensure that local and strategic need for purpose-built student accommodation is addressed, provided that:
1. at the neighbourhood level, the development contributes to a mixed and inclusive neighbourhood;
2. the use of the accommodation is secured for students;
3. the accommodation is secured for occupation by members of one or more specified higher education institutions;
4. at least 35 per cent of the accommodation is secured as affordable student accommodation as defined through the London Plan and associated guidance;
5. the accommodation provides adequate functional living space and layout.

B. Boroughs, student accommodation providers and higher education institutions are encouraged to develop student accommodation in locations well-connected to local services by walking, cycling and public transport, but away from existing concentrations in central London as part of mixed-use regeneration and redevelopment schemes.

The London Plan provides the following justification for Policy H17 “London’s higher education institutions make a significant contribution to its economy and labour market. It is important that their attractiveness and potential growth are not compromised by inadequate provision for new student accommodation. The housing need of students in London, whether in Purpose-Built Student Accommodation (PBSA) or shared conventional housing, is an element of the overall housing need for London determined in the 2017 London SHMA. London’s overall housing need in the SHMA is expressed in terms of the number of conventional self-contained housing units. However, new flats, houses or bedrooms in PBSA all contribute to meeting London’s housing need. The completion of new PBSA therefore contributes to meeting London’s overall housing need and is not in addition to this need. Every three student bedrooms in PBSA that are completed equate to meeting the same need that one conventional housing unit meets, and contribute to meeting aborough’s housing target (set out in Table 4.1) at the same ratio of three bedrooms being counted as a single home”.

Draft Policy H17 (Student Accommodation) comprises of a Part A with 5 separate points, followedby a Part B which are addressed in turn below.

1. Point A1 of Policy H17 requires Borough’s to ensure that local and strategic need for PBSA is addressed, provided “at the neighbourhood level, the development contributes to a mixed and inclusive neighbourhood”.

Point A1 is inconsistent and contradictory to the strategy proposed in Part B as the proposed policy wording implies there is a concern that the provision of student accommodation in new locations may have an adverse impact upon the local area and cohesiveness of the community, whereas, Part B seeks to divert student accommodation away from existing concentrations in central London i.e. in new locations.

The student population should be afforded an equal standing to residents given that they contribute significantly to the local and wider economy and the provision of student accommodation alleviates pressure on housing land supply in the same respect as conventional residential dwellings. In addition the need of a typical student to access GP, optician and dentist services are far lower than those residential properties with older family members or children. Students will invariably attend GP facilities on campus or where the parental home is. PBSA developments will also pay for their refuse collection which is generally undertaken within the development themselves, thereby minimising any inconvenience on the street or to the Council services.

Furthermore, the landlord is the long-term key stakeholder (i.e. Unite) whose reputation is dependent upon the responsible management of the student accommodation premises to ensure the amenity of neighbouring properties is not adversely affected and the proposal will positively contribute to community cohesion. It is an established practice for the applicant to prepare and submit a student management plan which addresses matters of noise, disturbance and anti-social behaviour as well as setting up regular meetings with local resident and business groups, and also providing contact points for neighbouring occupiers to alleviate these concerns.

The report titled ‘The Economic Impact of the London Higher Education Sector, April 2014’ assessed major economic characteristics of the sector including its revenue, expenditure, employment and secondary knock-on effects. Notably, the sector attracted approximately 102,995 students from outside the UK and in addition to paying fees, money is spent on rent, food and other living expenses, much of which accrues to the local area. International student off-campus expenditure amounted to an estimated £1.2 billion and domestic student off-campus expenditure was estimated at £1.4 billion which is regarded as a significant injection into the local and regional economy. The research acknowledges that all student expenditure is crucial to the local economy and is seen by local businesses as a core part of their revenue stream which is visually evident in the areas surrounding a university with the plethora of bars, cafes, shops and other services that serve the student population.

Accordingly it is considered that the point A1 serves no planning purpose and should be deleted.

User:	Unite Students

Point A2 states “the use of accommodation is secured for students.”

We agree with this approach, however, we consider it important to add further clarification to ensure the wording of the policy is not misinterpreted and propose the following: “the use of accommodation is secured for students across London”.

Student accommodation should be accessible to all students from all Boroughs. For example, if a student is enrolled at the University of Westminster they should be able to have the option to live instudent accommodation located within the LB of Lambeth and vice versa. If student accommodation is required to be secured for students attending HEIs within the same Borough it places heavy restrictions upon student choice and the ability for accommodation providers to efficiently occupy the rooms.

User: Unite Students

Point A3 of Policy H17 is supportive of student accommodation providing “the accommodation is secured for occupation by members of one or more specified higher education institutions”.

Paragraph 4.17.3 provides further justification and states “To demonstrate there is a local need for a new PBSA development and ensure the accommodation will be supporting London’s higher education institutions, the student accommodation must either be operated directly by a higher education institution or the development must have an undertaking in place from initial occupation, to provide housing for students at one or more specified higher education institutions, for as long as the development is used for student accommodation. A majority of the bedrooms in the development must be covered by such an undertaking. Therefore, the borough should ensure, through condition or legal agreement, that the development will continue to **maintain a nominations agreement** or enter new nomination agreements with one or more specifiededucation institution(s) for a majority of the bedrooms in the development, for as long as it is used as student accommodation or such time period as the borough considers is appropriate. There is no requirement for the higher education institution linked by the agreement to the PBSA to be located within the borough where the development is proposed”.

As stated above, Unite are supportive of Policy H17, Point A2 which requires accommodation to be secured for student use. This is in-line with current practice in London whereby the use of the accommodation is robustly secured in perpetuity by way of planning condition or clause in a Section 106 Agreement which usually reads “the occupation of the accommodation hereby permitted, shall be limited to students in full time education”.

However, Point A3 imposes a further requirement which states that unless the accommodation is secured by a specified University through a binding legal agreement, the development will not be supported. Unite do not support this approach as this type of binding connection with a specified provider at such an early stage in the planning process is extremely restrictive and does not coincide with the manner in which Unite operate which is to generate demand through students letting directly. Additionally, Unite have found that Universities are often reluctant to engage in such agreements where they are liable to pay void payments if they are unable to fill rooms or take a risk on losing a development (and therefore committed rooms) if it falls behind in the planning and / or construction process, which as articulated earlier can take between 4 – 5 years. This is further exacerbated if another development does come online but has gone to another HEI, therefore compounding the loss...It should be recognised that specialist student accommodation providers have the wealth of knowledge, experience and skills to offer and manage the accommodation within a community without the need to enter a nominations agreement with a specified provider.

The proposed implementation of a nominations agreement is far too restrictive and contradicts normal planning policies and practice which do not usually require an applicant to specifically identify by way of a formal agreement the end-user/occupant of land/building/unit prior to the granting of planning permission. In a practical context, this would be the equivalent of an application for office or retail development to be supported subject to the applicant been able to demonstrate
that the occupant of the building would be restricted to ‘KPMG’ or ‘Tesco’ for as long as the building remained in office or retail use (Use Class B1a/ Use Class A1). This would completely contradict the principle of competition which underpins the planning system. Furthermore, this does not allow for any unforeseen external circumstances beyond the applicant’s control which may occur between the date planning permission is granted to the point of occupation.

The proposed requirement of a nominations agreement is not only disadvantageous to the applicant but also from the University perspective. The agreement will force a University to commit to a selected accommodation provider at least 6 years prior to the completion of the development based upon realistic timescales allowing 1 year for acquisition, 2 year for planning and 3 years for construction. This is considered a conservative estimate as this doesn’t account for appeal timescales or construction delays. Therefore, as a minimum, 6 years may pass before a University can be guaranteed the agreed number of bed spaces but they are tied by nominations agreement nonetheless.

In light of the above, the proposed implementation of a formal nomination agreement is an excessive measure which will further delay the rate of development and will unnecessarily complicate the application process rather than promote and aid the delivery of sustainable development and is therefore considered unsound. The removal of this restriction will afford the applicant a greater degree of flexibility and enable rather than hinder the delivery of high quality student accommodation schemes which is essential to addressing the student accommodation shortfall in London Boroughs over the plan period.

Recommendation: We therefore request that Point 3 of Draft Policy H17 is removed in its entirety. The policy wording of Point 2 is sufficient in ensuring the accommodation is robustly secured for student use.

User: Unite Students

Point A4 of the Policy supports PBSA providing “at least 35 per cent of the accommodation is secured as affordable student accommodation as defined through the London Plan and associated guidance.”

Unite are concerned that the proposed affordable rent requirement for student accommodation is too high and will ultimately hinder the future delivery of good quality student schemes. Affordable rent cannot be considered in isolation and must be considered alongside the introduction of Borough and Mayoral CIL which collectively amount to significant additional development costs and will continue to have a dramatic adverse impact on the supply of student accommodation in the City. This will ultimately deter the delivery of student schemes and consequently place additional pressure on the supply of other conventional forms of housing. Unite, amongst other student housing providers are concerned that additional barriers will further slow-down the delivery of pipeline schemes across the city and ironically, result in unintended consequences comprising:

? A reduction in the supply of purpose built student accommodation;
? A reduction in the supply of affordable rent;
? Lack of supply of student housing not being able to address the increased demand and thus existing rents increasing; and
? An increase in students using the HMO/general needs housing market and thus reducing the supply of conventional housing.

With supply being reduced, market forces will dictate the rents of the limited supply of purpose built student accommodation and will inevitably become more expensive. Additionally, if the 35% affordable rent requirement is strictly enforced it is highly likely that accommodation providers will increase the rent levels on the remaining 65% to mitigate the financial impact on viability. As such, the practicality of the implementation of this policy and the principle is ultimately flawed and should be left to the free market.

The proposed wording is not only counterproductive to the policy of delivering affordable student accommodation but also to overall housing requirement given the positive contribution PBSA can make to the release of other conventional forms of housing. Constrained supply will mean higher rents which will inevitably undermine the London Plan aim to increase affordable student accommodation. In order to convey the outcome of this policy logically, an example is provided below.

tier of student rent	**Existing scenario across a student accomodation development**	**Post policy implementation scenario**
A (expensive)	A low proportion of students pay high rents (approximately 25%)	The proportion of students who pay high rent increases to 65%
B (Median/average)	The vast majority of students pay the median rent values (approximately 75%)	This value band of rent is lost
C (low cost)	No students pay discounted rent 0%	ewuirement for 35% of the development to be low cost rent.

The Draft New London Plan recognises that the provision of student accommodation makes a significant contribution in terms of alleviating pressure upon the supply of conventional housing across all London Boroughs. Paragraph 4.17.1 states “new flats, houses or bedrooms in PBSA all contribute to meeting London’s housing need. The completion of new PBSA therefore contributes to meeting London’s overall housing need and is not in addition to this need”.

PBSA is integral to the delivery of a wide range housing requirement and has a positive impact on housing supply through the release of other market housing on to the general market for example the release of HMOs back into family housing. However, the strict implementation of a 35% affordable housing requirement will render the development of student accommodation unviable and unattractive which will possibly result in the long term sustained shortage of PBSA which will exert significant pressure on more traditional housing markets. This is particularly unsustainable in respect of the increasing projections in student demand anticipated at additional 20,000 – 31,000 places up until 2025 and the increasing pressures on the conventional housing market in London. These would equate to a loss of 6,666 – 10,333 housing units (based on the Mayor’s guidance of 3 student bedrooms is the same as a 3 bedroom house) from the general housing stock.

In light of the increasing projections, it is clear there is a demonstrable need for student accommodation which is distinct from the need for affordable housing. Therefore, requiring affordable housing from this would double count the supply and subsequently conflict with paragraph 38 of National Planning Practice Guidance which states:

“All student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can be included towards the housing requirement, based on the amount of accommodation it releases in the housing market. Notwithstanding, local authorities should take steps to **avoid double-counting**”.

The evidence base document ‘The London Plan Viability Study, December 2017’ doesn’t adequately demonstrate with supporting evidence how the proposed 35% requirement for affordable housing has been justified. This requirement does not reflect the approach taken by a number of London Borough Council’s and contradicts initiatives proposed by student accommodation providers. Some boroughs already have in place affordability schemes such as bursaries and require developers to sign up to these. Where this is the case, another affordability scheme is not required and would be a double provision. If insisted upon, it will only serve to reduce the viability of student accommodation development which is already under pressure due to rising land values in London. Examples of Council’s adopted planning policy in respect of student accommodation and affordable housing are provided below:

? LB Southwark – Core Strategy Policy 8 (Student Homes) – “Allowing development of student homes within the town centres, and places with good access to public transport services, providing that these do not harm the local character”.

? LB Islington – Policy DM3.9 (Part H) – “Student accommodation will be approved where; the site has been allocated for student accommodation use; it can be demonstrated there will be no adverse impact on amenity… Planning conditions and agreements will be used to ensure student accommodation is occupied by only students”

? LB Lambeth: Policy H7 (Student Housing) – “Student housing will be secured by planning obligation or condition relating to the use of the land or its occupation by members of a specified educational institution. Where the accommodation is not secured for students, the development will be subject to the requirements of policy H2 in respect of affordable housing provision.”

? LB Greenwich: Core Strategy Policy H3 (Affordable Housing) – “Developments of student accommodation that are not robustly secured for student use (either by planning agreement or condition relating to the use of the land or to its occupation by members of specified educational institutions to make a contribution towards the provision of affordable housing.”

The ‘London Plan Viability Study December 2017’ uses two case study example schemes to provide evidence and convey that 35% affordable rent is viable and achievable. Paragraph 4.2.1 of the study notes that the case studies selected are hypothetical schemes to reflect the typology of sites likely to come forward over the life of the plan and are not intended to represent specific development proposals. Details of the schemes are as follows:

? Ref: SR1 – 9 Storey building, 300 beds (6,300 sqm)/ 0.38 hectares;
? Ref: SR2 – 15 Storey building, 300 beds (6,300 sqm) / 0.3 hectares.

The study only assesses two hypothetical examples of student accommodation schemes and concludes that the taller building SR2 is less viable than SR1 in all value bands and at (paragraph 10.4.3) “student accommodation is more viable (than some other uses), and this includes all of the value bands, although there are some exceptions to 50% being viable against the high benchmark land values, particularly in Value Band A. In these cases, 35% is generally viable”.

The assessment of two hypothetical similar schemes does not qualify as robust evidence base to support and justify viability calculations in order to establish the affordable requirement threshold for student accommodation; neither is it an accurate representation of student accommodation development across London and is therefore flawed. Enclosed within Appendix C are representations prepared by James. R. Brown and Co which robustly demonstrates why this policy is flawed and the evidence it is based upon is not substantial.

We note a number of recent student schemes across London Boroughs that have not provided student accommodation in strict accordance with this policy requirement as it would render the scheme unviable. We have undertaken research on student accommodation schemes which have been consented in London following the adoption of the Mayor's affordable rent policy **(Appendix D – Consented London Student Schemes, prepared by RPS).** From the research, we note at least 6 examples including:

Site at Junction of western Avenue and Old Oak Road (LB Hammersmith and Fulham)
The development proposed 306 student rooms across a part 6/7 storey building and planning permission was granted on 19 October 2016. The scheme was not referable to the GLA neither was an affordable rent contribution sought.

Holbrook House, Victoria (LB Ealing)
Redevelopment of the site to construct a part 16/18 storey building comprising 424 bed spaces and commercial units for flexible use. Planning permission was granted on 14 February 2017 accepting the provision of 10% affordable units with a discount of at least 20% on the full rent. The affordable rent quantum is based on the conclusions of viability testing by the applicant.

Emperor House, 35 Vine Street (City of London)
The redevelopment of the site to provide a mixed use building, including 619 student bedspaces was recommended for approval at Committee on 25 July 2017 and is currently awaiting determination. The proposal did not provide a contribution to affordable rent.

140 Wales Farm Road, Acton (LB Ealing)
The redevelopment of the site proposed 5 buildings up to 31 storeys in height comprising 736 student bedspaces, residential flats and commercial floorspace. The application was approved at Committee on 16 August 2017 despite no contribution to affordable housing but the applicant demonstrated the development would provide University accommodation to meet the needs of Imperial College.

4-10 Forest Road (LB Waltham Forest)
Planning permission was granted at Committee on 12 October 2017 for the construction of a 9 to 17 storey student accommodation block to provide 353 student rooms and 900 sqm of commercial floorspace. The proposal did not provide a contribution to affordable rent as it was demonstrated this was unviable.

Parkwood House (LB of Brent)
The planning application was recommended for approval at planning committee on 13 December 2017. The proposed development comprises the erection of a part 13 and 17 storey building to provide 283 student bedrooms. The applicant did not demonstrate a connection with a higher education provider, however, it has been agreed that this will be sought through a clause in a Section 106 Agreement. In the event this is not achieved, a viability review mechanism will be implemented to secure affordable student accommodation.

The above examples demonstrate that a flexible approach has been taken in the determination of recent planning applications for major student schemes since the affordable housing policy has been in force. This indicates that the policy has not been enforced strictly or consistently and in many circumstances it has been deemed appropriate to consider applications on a case by case basis and negotiate an appropriate provision which would be viable and satisfy all parties. Similar to the example of 140 Wales Farm Road, we consider it appropriate to remove the affordable housing requirement if student accommodation schemes are able to demonstrate a connection with a higher education provider.

Recommendation: We therefore propose that Point A4 of Draft Policy H17 (Purpose-Built Student Accommodation) is amended to:
“10 per cent of the accommodation is secured as affordable student accommodation as defined through the London Plan and associated guidance. However, if student accommodation schemes are able to demonstrate a connection with a higher education provider, point 4 of this policy does not apply and an affordable rent contribution will not be sought”.

As an alternative, Unite propose the concept of off-setting affordable rent through the promotion of existing sites whereby the affordable rent requirement is pooled and distributed amongst existing student developments in their portfolio. The benefits of this include that the affordable rent is immediately realised following the granting of full planning permission in the sense that Unite would commit the existing property to affordable rent irrespective of when development commenced on site. On average, this would equate to affordable rent being implemented two years prior to the main development (calculated on the basis of a 24-36 month construction period). As a result, this would prevent developers land banking and encourage them to build out planning permissions in
order to realise the value of them.

User: Unite Students

Point A5 of the policy requires that “the accommodation provides adequate functional living space and layout”.

The supporting text in paragraph 4.17.5 sets out additional information and notes that the design of the development must be high quality and in accordance with the requirements of Policy D1 London’s form and characteristics.
Point A4 of Draft Policy D1 (Design) states that proposals should deliver appropriate outlook, privacy and amenity. However, the above policies do not precisely specify what constitutes ‘adequate functional living space’ and there are no set space standards for student accommodation. In this instance, it is assumed that the minimum room size requirements and space standards for residential development are applicable.

We consider that the requirements and amenity space standards deemed ‘adequate’ for residential development should not be applied strictly to student accommodation given that they do not fall under the same Use Class, are occupied differently and should therefore be treated differently. In the assessment of appropriate space standards for student schemes a degree of flexibility should be applied which take into consideration a number of factors including, the wider merits of the scheme, access to communal living spaces, access to areas of open space, provision and access to leisure facilities and other outdoor spaces. In addition, the level of ‘concierge-style’ management, 24hour security and understanding pastoral care that Unite staff can provide on the wellbeing concerns for students, are not fully taken into account.

User: Unite Students

Part B of Draft Policy H17 (Purpose-built Student Accommodation) details the locational strategy for student schemes and states “Boroughs, student accommodation providers and higher education institutions are encouraged to develop student accommodation in locations well-connected to local services by walking, cycling and public transport, but away from existing concentrations in central London as part of mixed-use regeneration and redevelopment schemes”.

We reinforce the support for student accommodation in well-connected locations and encourage student schemes across all London Boroughs including new emerging locations. However, the latter part of the policy wording above seeks to deter student schemes away from central London locations. This has perhaps been influenced by the recognition that growth in student accommodation has previously been concentrated in central London Boroughs with Islington, Tower Hamlets, Southwark and Camden having accommodated approximately 57% of the provision for new student schemes over the adopted plan period. However, in perspective, 60% (23 of 38) of London’s HEIs are located within the central sub-area therefore demand here will be the greatest.

Furthermore, given that the majority of London's HEIs are concentrated within the central area, it is a logical and sustainable location for further student developments as this is where demand is greatest and future developments can benefit from the infrastructure, services and facilities which are already in place and those which are tailored specifically to serve students. Students want easy access to the institutions where they are studying and student accommodation providers are simply following this demand. The dispersal of student accommodation can only be sustainable where this coincides with the location of HEIs, for example, if they are seeking to expand or relocate to areas beyond their traditional "core locations" (typically central London). Similarly to HEIs, the concentration of student accommodation should be embraced as there are economic benefits/economies of scale which derive from their agglomeration in their existing central locations.

The evidence base document 'Student Population Projections and Accommodation Need for New London Plan 2017' refers to research undertaken by University of London Housing Services (ULHS) which estimates the existing provision of PBSA bedspaces in London at 83,000 and the projected net requirement between 2016 and 2041 at 88,500 additional bedspaces which equates to 3,500 per anum when assumed over the 25 year plan period. These statistics reinforce the need to deliver a greater number of student accommodation schemes throughout London.

Recent data presented in a report prepared by Jeremy Leach Research Ltd on behalf of The Watkin Jones Group, June 2017 titled 'Study of Demand for Student Accommodation' indicates that the need for student bedspaces within Central London outweighs the current supply. The report considers the existing and future provision of University maintained accommodation and private sector developers against the existing and projected need for bedspaces and concludes there is a significant undersupply within the central sub-region. Page 2 of the report states:

“Assessing the position amongst Central sub-region HEIs only, on the assumption that all of the pipeline (including schemes currently at the application stage) in the sub-region (6,855 bedspaces) will be constructed and with growth in student numbers averaging 2% per year, the level of provision of PBSA in the Central sub-region is projected to stand at 30.4% by 2020 which equates to a gap of 102,707 bedspaces. By 2020, therefore, with the current pipeline, although the level of provision of bedspaces will have increased from 28.1% to 30.4%, the gap in the number of bedspaces being provided will have increased by more than 5,000 from 97,307 to 102,707.”
The above statistics demonstrate there is a significant undersupply of student accommodation in all London Boroughs therefore we do not support the intention of the policy to divert student schemes away from central London areas. There are a total of 23 HEIs in central London which are recognised as making a vital contribution to the local economy subsequently the requirement for associated facilities should not be understated neither should their future growth be comprised by an inadequate provision of new student accommodation.

Recommendation: We propose to amend the policy wording of Part B in order to remove restrictions which may limit the geographical distribution of student accommodation across London and consequently supress future supply. The policy should read: **“Boroughs, student accommodation providers and higher education institutions are encouraged to develop student accommodation in locations well-connected to local services by walking, cycling and public transport.”**

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Draft London Plan Policy H17 (Purpose-Built Student Accommodation) states:

1. Boroughs should seek to ensure that local and strategic need for purpose-built student accommodation is addressed, provided that:

1. at the neighbourhood level, the development contributes to a mixed and inclusive neighbourhood;
2. the use of the accommodation is secured for students;
3. the accommodation is secured for occupation by members of one or more specified higher education institutions;
4. at least 35 per cent of the accommodation is secured as affordable student accommodation as defined through the London Plan and associated guidance; and
5. the accommodation provides adequate functional living space and layout.

1. Boroughs, student accommodation providers and higher education institutions are encouraged to develop student accommodation in locations well-connected to local services by walking, cycling and public transport, but away from existing concentrations in central London as part of mixed- use regeneration and redevelopment schemes.

Our client has requested that representations are submitted in order to challenge restrictive components of the above draft policy.

It appears to us that Part 1 of the draft policy is in conflict with part B. Requiring student accommodation to contribute to a ‘mixed and inclusive neighbourhood’ is acceptable in theory but how is this measured in practical circumstances? What is meant by ‘mixed’ and ‘inclusive’? We suggest that a high proportion of mixed and inclusive neighbourhoods are located within central London, which part B of the draft policy states is an unacceptable location for purpose-built student accommodation. Further clarity and justification regarding this approach is required.

Part 3 sets out that all future purpose-built student accommodation is secured for occupation by members of one or more specified higher education institutions. This is an unreasonable and restrictive requirement that should not be required as part of the determination of a planning application. Residential schemes do not identify the end user/future occupants as part of the determination of a planning application and this should not apply to student accommodation either.

If the Mayor is minded through this draft requirement to provide certainty as to the appropriate management of the building, then the draft policy should be amended so that a management plan is required. This would represent an approach that is considerably more reasonable.

Turning to Part 4 of the draft policy, Tide Construction Ltd appointed James R. Brown and Co Ltd to provide a critique (enclosed within this letter) of the proposed policy approach. The critique sets out the following:

- The London Plan Viability Study (LPVS) appears to have been written to support pre-determined policies within the plan, rather than to inform the policy making process;
- The LPVS and information from the Mayor's Academic Forum does not provide clear, justifiable evidence that affordable student accommodation is required across London;
- The data relating to student accommodation values within the LPVS is not only limited but it is also misrepresented;
- The London wide requirement for 35% affordable student accommodation appears to be based on only 2 site case studies;
- The LPVS is unclear as to whether sensitivity testing for student accommodation has been carried out;
- The build cost assumptions for student accommodation do not vary by storey in the LPVS. This does not match with the approach taken for conventional residential;

- The financial viability assessments do not appear to be available in the LPVS and there is no reference to the relevant RICs guidance note;
- There are questions that need to be answered as regards the approach to Benchmark Land Values, finance costs and profit levels;
- The financial viability assessments (two examples) should be included in
- the LPVS for transparency; and
- If Policy H6 does apply to student accommodation, it is not reasonable to require a review clause on viability tested schemes due to the unjustified nature of the LPVS.

Summary

On behalf of our client, we support the Mayor's ambition for a specifically tailored policy relating to purpose-built student accommodation in London, however it is critical that planning policy does not unnecessarily hinder the delivery of purpose-built student accommodation across the Capital. It is also critical that the location of purpose-built student accommodation is not limited due to the requirement for the developments to contribute to a mixed and inclusive neighbourhood or that direct-let schemes are restricted by the proposed policy.

As drafted, Policy H 17 fails to meet the tests of paragraph 182 of the NPPF as it is not justified. We have commented on the contradictions in requirements relating to 'mixed and inclusive neighbourhoods' as well as the unreasonable restriction as regards the proposal to require a nominations agreement with a university. James R. Brown's accompanying report has set out that the draft policy is based on evidence contained within in the London Plan Viability Study that is fundamentally flawed.

Ultimately, we are concerned that the above requirements are restrictive and will hinder the delivery of high quality purpose-built student accommodation across London.

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Proposed London Plan Policy H17 is not justified by robust viability evidence because the evidence in the London Plan Viability Study ('LPVS') is fundamentally flawed and/or wrong. More specifically:-

the requirement that 35% of the accommodation is secured as affordable studentaccommodation is not justified by robust viability evidence, and;

1. the requirement that the accommodation is secured for occupation by one or more specified higher education institutions is not justified by robust viability evidence or indeed any apparent rationale.

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a) Support or Inform:- Para 1 of the LPVS Executive Summary says its purpose is to ‘support’ the new London Plan. However, this implies a fait accompli as surely the main purpose of the LPVS should have been to ‘inform’ the potential policies in the new London Plan. As the LPVS is dated December 2017, it would not seem credible that the proposed new London Plan policies were generated almost immediately thereafter. Para 1.2.4 of the LPVS suggests that consultation on the proposed London Plan started at the end of November which pre-dates or almost coincides with the LPVS. What detailed instructions were the authors of the LPVS given and when, as this should be a matter for public record? The LPVS appears to have been written to support pre-determined policies in the new London Plan rather than inform policy making which is in-appropriate and undermines its credibility as ‘evidence’.

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b) Intervention & Justification for 35%:- Whilst planning policy has been intervening in the affordability and consequential value of housing for some years now, is this fundamentally legal and/or a planning policy matter? What part of what law permits and/or promotes this? Neither the LPVS and/or information from the Mayor's Academic Forum 'MAF' (as referred to in footnote 1 on page 9 of the LPVSTR) clearly justifies any requirement for affordable student accommodation across London with rationale or meaningful evidence. On 14/7/17, the MAF met although it is not clear from the meeting notes published on the GLA's web site who was in attendance (if indeed anybody other than GLA officers). The GLA presented to the MAF and this was one of their final slides:-

Text from Image of slide from Page 5 of Rep:

`Draft Policy for Student Accommodation

- **Providing affordable student accommodation**
  - **X% of the accommodation should be secured as affordable student accommodation**

55% of the maximum income that a new full-time student studying in London and living away from home could receive from the government's maintenance loan for living costs for that academic year

2017/18 = £6,051`

As can be seen from the above, the only evidence as to why X has become 35% since 14/7/17 must be as a consequence of the LPVS. We see no apparent evidence why 55% (as opposed to 75% or any other %) has been applied to the maximum income that a new full-time student studying in London and living away from home could receive from the government's maintenance loan for living costs for the academic year. What if the average student also earns money from part-time employment and why shouldn't they be expected to obtain part-time work rather than be subsidised by developers?

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c) Data Sources, Analysis and Non-Ascertainable Logic through to Conclusion:- As can be ascertained from Pages 9-13 of the LPVSTR, the data used to inform assumed student accommodation values and development costs is sparse and weak. Indeed, the whole LPVS/LPVSTR is an unfeasibly thin document bearing in mind PPG indicates that 'evidence should be proportionate' and that it underpins a wide variety of housing and quasi housing development across the whole of London. We have regularly seen more substantial viability reports relating to a single site. The sparse and weak data is also poorly and in-sufficiently analysed. For example, with respect to student accommodation, an annual income table is presented on Page 10 of the LPVSTR but the relevance and/or distribution of the student 'Value Bands' is highly questionable and there is a completely in-sufficient breakdown of income which should at least be broken down into:- ? University stock or private? ? Private – direct let or Nomination Rights Agreement? ? New or old stock? ? En-suite rooms or not? ? Proximity to University campus/main buildings? The LPVS's failure to sufficiently breakdown and analyse necessary data fundamentally undermines its credibility. Having considered the data and having been forced to deduce what the financial viability assessments of the 2 student development archetypes might look like in detail, we cannot ascertain how the LPVS concludes that 35% affordable student accommodation is viable across London. There is no auditable trail and so the LPVS/LPVSTR does not represent evidence.

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d) Case Studies, Archetypes and Sample Size:- The London wide viability/sustainability of a 35% affordable student accommodation requirement is based upon only 2 site case studies in the LPVS. Indeed, these are not even real sites/schemes and are therefore just 2 hypothetical/random archetypes. The sample size of 2 hypothetical archetypes is clearly deficient and is reason alone to confirm that Policy H17 should not be adopted. Furthermore, the implied footprints of the 2 assumed student development archetypes equate to footprint/site area ratios of 18.42% and 14% (i.e. abnormally low unless they are substantially bigger at lower level than they are at upper level) which also begs the question as to whether these archetypes are realistic. On the face of it, they do not appear to be.

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e) Incorrect and/or Misrepresented Data:- We are familiar with the Savills forecasts on page 16 of the LPVS but the LPVS fails to clarify that these forecasts do not apply to ‘new build’ which London Plan policies are aimed at.

Furthermore:-

- the forecasts listed on page 16 of LPVS are already out of date as most of the cited forecasters have since pegged back their growth forecasts, and;
- the LPVS fails to use ‘independent’ data sources rather than estate agent forecasts (who might wish to avoid gloomy predictions). Forecasts from independent bodies (e.g. MOLIOR) should feature. Assuming the LPVS has used incorrect and/or has misrepresented base data such as this throughout, the LPVS is not professionally reliable.

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g) Build Costs:- The build cost indications produced by Turner & Townsend in Table 6.2 (page 40) in the LPVS do not vary by nos storeys even though they have been varied by storey height for residential development. This is not logical. Although the build cost rates are reported to have been produced by Turner & Townsend, this is not evidence in itself. Detailed comparable contract evidence is surely needed to justify these rates to represent 'evidence'. In our experience (and that of Tide Construction) the build cost rates suggested by Turner & Townsend are un-realistically low even if they relate to total scheme GIAs (which the LPVS fails to clarify). If they relate to NIAs then they are utterly un-realistic. We are currently working on a student accommodation proposal in L.B. Southwark where a professional QS is of the opinion that the likely build costs for a medium sized scheme (plus ground floor commercial space) equates to £3,250 p.s.m. on the total scheme GIA. We are also aware of a 558 student bed scheme in Wembley (i.e. not likely to be one of the most expensive parts of London to build in logistically) where the build contract signed in June 2016 equated to £2,564 p.s.m. on the total GIA but, allowing for indexation since, would now be around £2,820 p.s.m. The LPVS needs to provide extensive and explicit evidence regarding student accommodation build costs as, at the moment, the build cost rates used are unclear and un-substantiated.

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h) Model:- Although one cannot see any of the financial viability assessments that we assume the authors of the LPVS have prepared using the Three Dragons/GLA Toolkit, we question why the authors (i.e. The Three Dragons et al) have used the Three Dragons/GLA Toolkit software bearing in mind the vast majority of viability consultants (acting for either Councils and/or applicants) dispensed with this as an inferior model several years ago. Independent reviews of the Three Dragons/GLA software (e.g. by BNP Paribas) have previously confirmed that it is inferior to software such as ARGUS, so why use it? We fully expect the appraisals prepared by The Three Dragons et al in the LPVS to contain 'error equivalents' as a consequence of the software used which undermines its conclusions.

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i) General Approach to Viability Testing:- The LPVS makes no reference to (and does not appear to have given any consideration to) the RICS's Guidance Note 94/2012 (Financial Viability in Planning). The RICS has been the pre-eminent professional institution representing the UK property and development industry for many decades. To evade guidance provided by the RICS ignores input from most of the UK development industry which is not reasonable and questionable. Charles Solomon (now head of viability at the GLA) was part of the Core Working Group that produced the RICS GN 94/2012 and so one would reasonably expect viability studies instructed by the GLA to consider it.

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j) Approach to BLVs (echoing the Mayor's Affordable Housing SPG and referred to in notes to proposed London Plan Policy H6):-

The approach used within the LPVS to derive BLVs is misguided and the evidence used is not

evidence.

In our opinion, the RICS's guidance on arriving at BLVs as set out in their GN94/2012 is well thought through and reasonable, albeit unavoidably open to some criticism.

However, certain stakeholders in the planning system are seeking to dismiss the RICS's guidance in favour of guidance within the Mayor's Affordable Housing SPG which is open to a lot more criticism.

There is no perfect approach and cannot be for a variety of reasons.

The LPVS has heeded the Mayors guidance on viability and therefore inevitably concludes that student accommodation development across London can viably sustain a 35% affordable student bed-space provision. However, this is because the Mayor's guidance creates an artificial viability world. This is a major problem as the required approach to viability within the Mayor's Affordable Housing SPG is echoed within the proposed London Plan (particularly via H6 and Sections 4.6.1 to 4.6.15).

We have already made representations on the Mayors Affordable Housing SPG and its viability guidance and we would re-iterate everything we said therein (see Appendix 1).

Via the new London Plan, we feel the Mayor is in-appropriately seeking to politically intervene in the free market via the planning system by unduly influencing/directing how Benchmark Land Value ('BLVs') should be arrived at (whereupon the required approach is also poorly defined).

We think the Mayor’s guidance needs to be less prescriptive.

Via Section 4.6.10, 4.6.11 in the proposed London Plan plus the Mayor’s SPG and the

LPVS/LPVSTR, the narrative and in danger of practically enforcing the use of ‘EUV plus a land- owner’s premium’ (“EUV Plus”) as the only acceptable approach to BLVs. The Mayor and the proposed London Plan (including numerous references to the Mayor’s Affordable Housing SPG) effectively supress Alternative Use Value (“AUV”) and/or Market Value (as defined by the RICS in their GN 94/2012) as an approach to BLVs.

In reality, land values are ultimately determined by the market and prospective vendors of land will always consider AUVs and Market Value before selling. Meanwhile, purchasers of

development land will usually seek to minimise what they need to pay for development land and so it would be wrong to assume that they readily over-pay.

‘EUV Plus’ is poorly defined compared to the extensive/clear definition and explanation provided by the RICS for Market Value in their GN 94/2012. AUV is also poorly defined but is effectively a component of Market Value.

With respect to EUV Plus, the key question is what the ‘Plus’ bit should be? For no apparent or logical reason, the GLA and their supportive consultants keep pointing to ‘20%’ on numerous projects we have worked on but this is arbitrary. It also makes no sense whatsoever on sites that are cleared but have obvious ‘alternative use’ potential.

The Mayor’s Affordable Housing SPG says that land-owner’s premiums “could be 10 per cent to 30 per cent, but this must reflect site specific circumstances and will vary”. This Mayoral SPG wording is in danger of being interpreted to mean land–owner’s premiums should or must be 10% to 30% which is highly problematic and in-appropriate. We think the London Plan needs to absolutely clarify this if the EUV Plus approach is to be endorsed as the preferred approach (and/or used as alternative terminology for Market Value as defined in the RICS’s GN 94/2012).

In reality, the ‘Plus’ percentage or sum (as there is no logic to suggest it should ever be any particular percentage) will or should take the BLV up to the sum that is equivalent to Market Value (as defined by the RICS in their Guidance Note GN 94/2012, as opposed to the ‘Red Book’, and whereupon full regard to planning policy must underpin development land purchaser prices). This may well be via the identification of alternative use development potential.

Some people point to ‘Parkhurst’ as important appeal case precedent on the topic of BLVs.

At the Parkhurst appeal (APP/V5570/W/16/315698) the Inspector considered an SVB of £6.75m to be reasonable even though the EUV was negligible or, at best, up to £700,000. Whatever terminologies one wants to use, the Inspector effectively considered a BLV equivalent to EUV plus 868% as reasonable. This confirms that it is not appropriate or reasonable for the Mayor or any Council to try and claim that a land-owner’s premium should be 20% or within the range of 10% to 30%.

The Mayor’s Affordable Housing SPG requires that landowner premiums are justified and yet, ultimately, there is no way of justifying any particular landowner premium (be it zero, 20%,300% or £3m) without some kind of reference to land transaction evidence as it is otherwise arbitrary. Whilst the Mayor’s SPG indicates that the level of premium can be informed by benchmark land values that have been accepted for planning purposes on other comparable sites, we do not think this is reasonable. It would not necessarily mean a 20% premium (for example) is reasonable just because 20% was agreed (by way of an incidental ‘equivalent’ percentage) on a neighbouring site. Firstly, it may not have been ‘agreed’ but rather accepted under protest and, secondly, it would be equally reasonable to suggest that if a BLV equivalent to £10m per acre was agreed on a neighbouring site, that £10m per acre should be applied to the subject site – whether this equates to a premium over and above EUV of 20% or indeed 300%. In other words, references to and/or the application of land-owner’s premiums via ‘percentages’ is in-appropriate and the London Plan should clarify this.

Furthermore, AUVs (which are effectively a component of Market Value) should not be supressed by the wording of the proposed London Plan policies and/or by its references back to the Mayor’s Affordable Housing SPG. The London Plan should support the use of an AUV and/or Market Value approach where the subject site is cleared (i.e. with no physical existing use thereon). N.B. We are currently working on a cleared un-contaminated 3.8 acre site in an urban centre in a south-eastern London Borough where a prolific viability consultant to London Boroughs and the GLA is seeking to apply a BLV of £1 based upon EUV Plus. In practice, this is where EUV Plus can lead (i.e. a nonsense).

A BLV is the most crucial assumption within financial viability assessments and yet contention still exists with regard to how these should be reasonably derived.

There is no meaningful, logical or reasonable evidence supporting the Mayors guidance to viability. The RICS is apolitical and is surely the appropriate body to provide guidance in this regard.

Returning specifically to the LPVS/LPVSTR, this seeks to use BLVs agreed on certain planning consents by alleging that BLVs in associated S.106 Agreements (e.g. within review clauses) were ‘agreed’.

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k) Profit:- Para 2.5.6 of the LPVS says its viability testing assumes a ‘private developer’. Clearly, the identification of reasonably necessary profit targets to private developers is therefore crucial to determining viability. The LPVS states at Para 2.5.4 that “residential values and profit targets have been compiled by Housing Futures Ltd”. Having sought to establish what experience Housing Futures Ltd have with regard to residential values and profit targets, there is very little information available on the internet and we cannot find their web site. It appears that Housing Futures Ltd may be a person called Peter Redman who, some internet references say, has ‘worked in social housing for 40 years’ including a number of housing association and local authorities. With respect, we are concerned that 2 crucial assumptions (i.e. profit targets and values) that are fundamental to the LPVS’s conclusions and London wide planning policy have been ‘compiled’ by a consultancy that might not have sufficient experience in this regard. Furthermore, it is not clear what ‘compiled’ means in context. Have they determined what reasonable profit targets are? The LPVS makes no mention of having gathered any evidence from Banks, financial intermediaries, equity and mezzanine financiers/funders with regard to what they need to see as prospective development profits in order to satisfy their conditions precedent to lending across a variety of property types and development risk profiles. If this evidence has not been obtained and considered as part of the LPVS, the LPVS cannot be credible as, without funding, development cannot happen. At the moment, we are not convinced that sufficient evidence has been obtained and analysed to determine what a reasonable/necessary development profit is across the various housing, quasi-housing and mixed-use development projects considered within the LPVS because it is not apparent.

With respect to student accommodation (classed as ‘other residential’ in the LPVS), it does not clarify what development profit levels have been used for the 2 student development archetypes in Section 6. This section indicates that, unless stated otherwise in Section 6, the viability testing assumptions used are as set out for ‘residential’ in Section 5 (which also makes reference to Annex G) or are in Section 7 (non-residential). However, between all of these Section and Annexe G, the LPVS does not state what profit requirements have been assumed for student accommodation development which clearly undermines the LPVS’s viability conclusions for student accommodation development. If the LPVS did clarify its assumed development profit for student accommodation, this would need to be varied between; direct let schemes, schemes subject to nomination rights and different Nomination Rights Agreement formats as all of these would involve different risk profiles. It is not apparent that the LPVS has done this with regard to the 2 student development archetypes tested. We therefore assume it has not be done and the LPVS is therefore deficient and, again, flawed with respect to its student accommodation development conclusions. Meanwhile we assume that the LPVS has used a profit requirement of 20% on the scheme GDV albeit, as indicated above, this actually needs to be broken down into the various types of risk profiles that are often relevant to student accommodation development.

User: Tide Construction Ltd

l) Finance Costs:- Table 5.15 (page 34) in the LPVS indicates that the GLA have instructed the authors of the LPVS what finance rates to use. Surely the authors of the LPVS should produce evidence and express a justified opinion in this regard? This is not evidence. Although Table 5.14 suggest that the GLA have evidence to support the instructed finance rates, we have looked at 'The Value, Impact and Delivery of Community Infrastructure Levy' (University of Reading, Three Dragons, Smiths Gore and David Lock Associates – Feb 20127) for example but see nothing in there that represents evidence to support any particular finance rate assumption. Our experience of finance rates to the average hypothetical developer is that they are significantly higher than the GLA are suggesting including finance facility fees (which should not be ignored). Up to date explicit evidence is required regarding finance cost assumptions before the LPVS can be considered credible in this regard. With respect to footnote 50 on page 34 of the LPVS, it is not appropriate to spread land finance costs over half the development period as professional development valuers would confirm. It is usually reasonable to spread finance costs on construction in this way because construction costs are indeed spread over the development period. However, finance costs on land compound from the day of purchase and usually continue compounding until the end of the development (or close to) unless the development is substantially phased (which is rarely the case with student accommodation development). This indicates that, in all likelihood, the results from the LPVS's viability testing of their 2 student development archetypes are wrong for this reason alone. In conclusion, finance rate/cost assumptions significantly affect viability tests and yet the LPVS provides no evidence in support of its assumed rates/costs and has also applied them incorrectly with respect to land finance. This undermines the LPVS's conclusions regarding student accommodation development. Proposed London Plan Policy H17 should not be adopted for this reason.

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m) Transparency & Financial Viability Assessments:- We assume that detailed financial viability assessments have been prepared for the SR1 & SR2 student development archetypes using the Three Dragons/GLA Toolkit. However, these are not explicitly provided within the LPVS and/or LPVSTR which is not reasonable as, without these, we cannot check their accuracy and/or how certain assumptions have been translated across. This fundamentally undermines the LPVS/LPVSTR as evidence as key parts of it are not transparent. We have struggled to ascertain and/or assume that the following assumptions have fed into the financial viability assessment of SR1 (for example) as follows:- Archetype 1 ('SR1'):-

- 0.38 hectares.
- 300 beds.
- 6,500 sq.m. (N.B. Not stated whether this is overall scheme GIA or NIA but we assume it is total scheme GIA).
- *9 storey development.*
- Not clear which Value Band the archetype sits in with respect to the Student Housing Annual Income table on Page 12 of the Technical Report and/or what relevance this might have except with respect to build costs (see below). We assume it is in Value Band C.
- Not clear which BLV Value Band the archetype is in with respect to Table J3 on Page 58 of the LPVSTR although we assume it is in 'Inner' and is 'Mid' such that the BLV assumed by the LPVS must be 6,500 sq.m. x £598 = **£3,887,000**. In other words, we believe the LPVS must assume that 0.38 hectares suitable for student accommodation development can be purchased for 10.23m per ha (or £4.14m per acre).
- Value of built 300 bed scheme = £164,000 x 300 = £49,238,700(see Table 6.1 on Page 40 of the LPVS).

- Build cost rates in Table 6.2 on Page 40 of the LPVS do not state whether they apply to the total scheme GIA or NIA. This, again, is why we need to see the actual financial viability assessments prepared by the Three Dragons et al. We assume, as is normal, that they relate to the total scheme GIA although we suspect that they might not as the Three Dragons Toolkit used to apply build cost rates to total unit NIAs. This would imply a significantly lower rate p.s.f than the rates on pager 31 might suggest and would then appear too low. This is important. The build cost rates in Table 6.2 on Page 40 of the LPVS are not varied by nos storeys either even though the 'residential' build costs are (which is illogical).
  We have assumed that the LPVS has assumed a total build cost of 6,500 x the mid- point of **£2,459** = £15,983,500 for SR1 excluding; a contingency, professional fees, external works and all of the other items (many of which would feature in a typical London/urban development) as listed in Appendix E in the Technical Report. BCIS generally recommends the addition of 15% to a core build cost for externals although we note that the LPVS has used 8.55% (questionable) and so we assume that the LPVS has assumed a total build cost of £15,983,500 plus a 5% contingency (£799,175) plus 8.55% externals (£1,366,589) plus professional fees at 10% (£1,598,350) plus demolition (site area x £29 = £110,200) plus abnormal costs (at £166 p.s.m., oddly different to the rate used for residential projects x 6500 = £1,079,000) = £20,936,814.
- CIL/MCIL/S.106 costs of (assumed on average by us albeit these do of course vary substantially across London) and may or may not be subject to relief in connection with existing occupied/recently occupied buildings etc = £2m.
- Finance costs = **6.5%** debits and 0% credits (which we consider too low).
- Reasonable developer profit = Not clear from the LPVS for student accommodation but we assume **20% of 'GDV'** as a means to benchmark the residual profit driven by the appraisal in **Appendix 2** (attached) which we have prepared using what we think are the assumptions used in the LPVS (i.e. not our assumptions). **Indeed, all of the above red shaded (bold) numbers and/or rates are far too low, especially the BLV, build cost and profit requirement.**
- Marketing costs = 3% of GDV.
- Agent acquisition fees = 1.75%.
- SDLT = as per HMRC rates.
- Development programme = unclear. See **Appendix 2** for our assumptions.

A residual profit appraisal using ARGUS and the above assumptions can be seen in **Appendix 2**. We have not accounted for any 'affordable' (as defined by the GLA) student bed-spaces. The appraisal in **Appendix 2** suggests that the SR1 archetype would drive a residual profit of 56.24% on GDV without any affordable student accommodation within the scheme. However, it assumes completely unrealistic assumptions with respect to:- ? The BLV/land cost (see Section on BLVs above). ? Build costs (see Section on build costs above). ? Interest costs (see Section on interest costs above). Furthermore, the scheme needs to make a profit of at least 20% on GDV as opposed to 12% if it is speculative (which the assumed student GDV within the LPVS implies). If the scheme had been pre-sold and/or were subject to a Nominations Rights Agreement with a University, it might not achieve £160,000 per bed for a variety of reasons that the LPVS does not appear to touch upon or be aware of. For example, Universities tend to actively depress the rents that operators can charge students if they are to enter into Nomination Rights Agreements - which actually presents an interesting phenomenon whereupon the whole scheme effectively becomes an affordable student rent concept by implication (i.e. 100% as opposed to 35%). Placing a 35% affordable student requirement on such a scheme would cause a double negative viability impact that would be unsustainable. Issues like this are simply not considered or dealt with by the LPVS/LPVSTR which, again, means it is fundamentally flawed with regard to student accommodation development. The student accommodation viability testing results on Page 80 of the LPVSTR are inconclusive as it is not possible to analyse how these have been arrived at or what the results actually are or why. For example, the result for SR1 at 50% affordable indicates a residual land value of about £27m per hectare. The SR1 archetype site area is 0.38 ha and so we assume the LPVS appraisal drives a residual land value of £27m x 0.38 = £10.64. In turn, we assume (because the LPVS does not clarify) that this is benchmarked against the Inner/Low BLV in Table J3 (page 58 of the LPVSTR) and the 6,500 sq.m. archetype such that 6,500 x £326 = 2,119,000. Therefore, the implication might be that the LPVS is claiming that, with a 50% affordable student accommodation provision, the scheme drives an extraordinary profit surplus of £10.64m minus £2.12m = £8.52m. Frankly, this would be miraculous. By revealing the detailed development appraisals behind these results will, in our opinion, expose this claim to be completely unrealistic and/or wrong. We need to see the detailed viability appraisals behind the LPVS's results and until we can and have been given an opportunity to scrutinise these, the LPVS is not credible evidence. As well as our concerns about how the BLV 'rates' in Table J3 (page 598 of the LPVSTR) have been arrived at (see BLV Section above), it is not apparent why the LPVS results on page 80 of the LPVS are 'headlined' against the 'lower' benchmark values. Surely, it would be more appropriate to 'headline' against the 'mid' values as a London-wide policy informative?

Furthermore, Table J3 on page 58 of the LPVSTR suggest that the value bands used for student accommodation are ’central’, ‘inner’ and ’outer’ and yet the student viability test results in Figure 10.4 on page 80- of the LPVS refer to value bands A-E. Also, assuming that values in Value Band A are higher than in Value Band E, how can the residual land value driven by SR1 A @ 50% affordable be lower than SR1 C at 50% affordable. Something has gone seriously wrong with the LPVS student accommodation viability testing results graph at Figure 10.4 (page 80 in LPVS). This is fundamentally undermines the LPVS’s conclusions regarding student accommodation and its support for proposed London Plan Policy H17 is unsound.

User: Tide Construction Ltd

n) Review Clauses:- If Policy H6 applies to student accommodation development and review clauses will end up being required on viability tested schemes that do not offer 35% affordable student accommodation as a consequence of the London Plan, this would be unreasonable, unjustified and in-appropriate because:- The LPVS is fundamentally flawed for a number of reasons identified above and so 35% is not justified by evidence to start with, and; The Mayor's Affordable Housing SPG does not contain any review clause formulas for student accommodation projects and neither would any such clauses be practical given if the accommodation is retained for rent, and; Evidence demonstrating that review clauses are not prejudicial to the fundability of development has not been provided and has not been properly considered (if at all). In earlier London Plans, review clauses were only considered appropriate on long term phased development projects and nothing has occurred since to warrant any deviation from that approach, and; Sound advice from the RICS (in their GN 94/2012) indicates that, for short term projects, review clauses are not appropriate and, for longer term phased projects, only pre-implementation reviews are appropriate. There is no evidence or ultimately constructive sense to have 'near end of development' reviews on short term projects and no need for pre-implementation reviews if a viability exercise has just been gone through. Review clauses are a serious threat to development especially as the GLA will combine them with un-realistically low BLV references. Although some review clauses have been agreed in what has been a rising market over recent years, we think these are in danger of seriously blighting development over the next few years where growth is not forecast, and; Banks, equity and mezzanine development financiers/funders need to be consulted directly, independently and comprehensively to establish what they will do if review clauses coupled with low BLVs become the norm. This is an imperative but has not apparently been done, and; Review clauses will seriously damage the ability to fund schemes as, in particular, loan security valuers will not be able to demonstrate adequate loan to value cover and risk cover.

User: Tide Construction Ltd

APPENDIX 1 TO REP

COMMENT ON THE DRAFT AFFORDABLE HOUSING & VIABILITY SUPPLEMENTARY PLANNING GUIDANCE (SPG).

Introduction:- My views herein are on behalf of; James R Brown & Company Ltd and all past/present/future clients whether they are planning applicants or Boroughs. We mainly act for planning applicants but occasionally act for Boroughs. I have been appraising the viability of development projects for approaching 30 years and I am a qualified RICS Registered Valuer. I have also been directly employed by property development companies in the past. Over the last 5 years (i.e. since the demise of Housing Association Grant), I estimate that I have produced viability reports for planning purposes on over 350 projects in London ranging from a two house scheme up to individual projects with Gross Development Values approaching £1bn (e.g. Whiteleys, W2). Affordable housing provisions have been agreed at local level on about 98% of those projects following scrutiny of my reports by independent viability consultants. On average, the vast majority

of those projects ended up with significantly less than 35% affordable housing but more than the 13% referred to in Section 1.2 of the SPG.

General Response to the SPG:- a) The current system of negotiating affordable housing provisions on a site specific basis often involves numerous debates/issues but it is the optimum reasonable system in so far as Section 106 ("S.106") is capable of delivering affordable housing. b) Whilst greater certainty in development would theoretically be welcome, any quasi fixed affordable housing percentage (especially a high one like 35%) will eliminate numerous potential sites which can only come forward viably with less than 35% affordable. Recent history tells us that this is indeed most sites (hence the recent 13% delivery quantum referred to within the SPG). c) Although, the SPG does not prevent viability representations being submitted for schemes with less than 35% affordable, the implication of extended review clauses (bearing in mind how these are panning out in terms of how Boroughs are requiring them to operate seemingly without full appreciation of the related funding implications or the delays review clauses tend to bring about with respect to structuring and policing them) is such that either path to agreeing affordable housing provisions presented by the SPG (i.e. Routes A or B via the Threshold Approach) are un-sustainable. I do not think either option will incentivise the market, quite the opposite. d) Whilst everybody would like to see more affordable homes and a greater percentage proportion of affordable homes, the S.106 model is not the answer. The S.106 model is not meant to be a tax but a means to address harm caused by development. The Mayor and Government need to look at other affordable housing delivery models (and/or be more flexible with respect to the time duration of affordable housing 'restrictions' on S.106 affordable housing and affordability issues) as the S.106 model is already delivering as much quantum/quality as it can. e) As we all know, property markets move in cycles and most market commentators were calling the top of the market in London (notwithstanding that there are variances between Central & Outer London etc) towards the end of 2015. f) Recent 'start on site' statistics (e.g. as reported by MOLIOR – Page 14 Quarterly Analysis: Sales – January 2017) indicate a sharp reduction in the number of starts between 2015 and 2016. Now is not an appropriate point in the market to introduce an SPG like this. g) I believe that, in summary, this is because short to medium term markets are particularly uncertain, particularly since the Brexit referendum. h) Whilst the SPG seeks to help create certainty, it is seeking an average quantum of affordable housing that, on average, is too high and the main certainty will unfortunately be that this will substantially diminish development implementation and progression.

i) Whilst the GLA may witness some planning applicants offering 35%, the overall picture in terms of starts on site will be the key measure as to the success or calamity of this SPG. j) It is clear that 35% is too high because, even in a rising market over recent years, 35% has not been delivered despite vigorous independent viability scrutiny. k) Where has 35% come from? Is there any up to date evidence to support this percentage as being, on average, viable? The fact that only 13% (if correct – as this does sound low) affordable housing has been delivered recently (following scrutiny by independent consultants) and that starts on site are currently falling sharply clearly indicates that 35% affordable is not typically viable.

l) Whilst it is obvious that the GLA want to diminish land costs/values down to try and forcibly assist viability, I fear this will simply stop many sites coming forward for development. Does the Mayor have any considered evidence with respect to quantifying this substantial risk? m) The SPG is not clear upon whether a review clause route will be required if the tenure split and/or affordability split of a 35% provision is not policy compliant. What is most important between; affordable housing quantum, the tenure type of affordable housing and/or the affordability of affordable housing? I would suggest that the latter is the most important but this does not facilitate the highest quantum of affordable housing. n) The SPG and rapidly emerging advice to Boroughs from their viability consultants (following this draft SPG) does not appear to appreciate how most private residential led development is funded. Most involves a significant amount of Bank finance. To secure this, certain loan to value ratios have to be identified as well as prospective profit/risk levels. Currently emerging review clause concepts are in serious danger of rendering many prospective development projects un-fundable. o) Overall, I think this SPG will unfortunately damage housing delivery at this time.

Using the numbering in the SPG from hereon to make specific points, we comment against these as follows:- Page 5 (S.9) – a move to 35% when schemes that have actually been delivered are averaging 13% affordable is substantially more than a 'nudge'. It is not reasonable to expect, on average, developer's to move from delivering 13% to more than double. Has the Mayor prepared any hypothetically 'typical' residual appraisals across the Boroughs to see what Residual Land Values ("RLVs") are produced with 35% affordable housing along-side CIL payments etc and has the Mayor considered how these compare to 'reasonable' land values in the context of existing and competing land uses other than residential? If not, I would ask again - how is 35% justified and is there any up to date evidence to support this? Page 6 (S.6) – the 'debate' about appropriate approaches to Benchmark Land Values ("BLV" – a.k.a. SVB) has been around for several years but remains critical. I believe that, if approached appropriately and

reasonably, all of the current guidance (i.e. whether from the RICS, the GLA and/or other bodies) should lead to the same BLV number. In my experience, Boroughs and the GLA tend to shun the

words ‘Market Value’ with respect to BLVs as they suspect this inevitably means high BLVs which lead to lower affordable housing provisions. However, this view of Market Value is unnecessary as the specific definition of Market Value in the RICS’s Guidance Note 94/2012 (Financial Viability in Planning) is well thought out by highly experienced professionals (who advise both private and public sector clients) and it is not the same as the definition of Market Value in the RICS ‘Red Book’. This means that, if approached correctly, the use of Market Value as defined within GN 94/2012 will not lead to SVBs which are purely based upon what similar sites may have recently sold for. Regard will had to whether or not such transactions appropriately accounted for planning policy. Existing Use Value, Current Use Value and Alternative Use Values are a component of Market Value (as per RICS GN 94/2012). Whilst I understand the GLA’s concerns in how BLVs are arrived at, it is not realistic, reasonable or constructive to seek to cast aside Alternative Use Value as a key driver of BLVs and, furthermore, land transaction evidence needs to be considered (albeit with caution and with appropriate analysis) in deciding what ‘land-owner’s premium’ should be added to a CUV or EUV assessment. A problem has developed amongst some viability consultants advising Boroughs whereupon they typically apply a ‘semi-fixed’ 20% land-owner’s premium (or less) for no discernible or evidential reason. The somewhat excessive but nonetheless valid example I tend to cite when querying this is what would happen if one had a garden shed on an acre of land in the middle of Mayfair. If the shed had an EUV /CUV of £1,000, it is clearly un-reasonable to suggest that the site would come forward for development for £1,200. General land transactions in the area would influence the minimum price at which a vendor would sell. The EUV or CUV plus land-owner’s premium approach has merit but not if a land-owner’s premium of 20% is considered to be ‘standard’ (which it should not be). Unless we are all going to be completely unrealistic, consideration must surely be given (albeit with caution and based upon appropriate/reasonable analysis) to:-

? Land transaction comparables. ? Whether the site is in a particularly low value use surrounded by high value uses and/or in a high value area. ? Whether the site is income producing or not. ? Whether there are any ‘push’ influences on a hypothetical vendor to sell. ? Any other valid/reasonable evidence or logic.

If one adds an appropriate land-owner's premium to a reasonable EUV or CUV, one effectively ends up with Market Value as defined by the RICS in their GN 94/2012. In this sense, the EUV/CUV plus land-owner's premium becomes a valuation 'method' with Market Value being the valuation 'basis'. Whilst references are made amongst some viability consultants to typical land-owner's premiums ranging between 10-40% over EUV/CUV, it needs to be appreciated that, if expressed as a percentage, it might well be substantially above 40% (e.g. in the case of the garden shed in Mayfair example mentioned above). On the ground, I have found some viability consultants, Boroughs and the GLA unfortunately seeking to unreasonably translate the EUV/CUV plus land-owner's premium approach and seemingly apply a cap of 20% on land-owner's premium. For example, I had one case where the site was about 8 acres and accommodated a football stadium and hotel. The Borough and their viability consultant were insistent that an appropriate BLV in that instance was £zero. Clearly, that was beyond unreasonable. To a lesser extreme, another project I have recently worked on involved a cleared site in E16. The Borough, their viability consultant and the GLA all recently claimed that a reasonable BLV is one which happens to equate to about £1.56m per acre. Unfortunately, even accounting for the fact that the Mayor wants to diminish land values to assist viability, vendors will simply not bring prospective development land forward at these levels. This is a major concern. 1.3 I do not believe the SPG's main aim to accelerate overall housing delivery will be achieved. An aim to secure more affordable housing in a more uncertain market cannot surely happen. 1.14 A number of Boroughs have used one or two viability consultants to produce viability reports to underpin and justify their Borough Wide affordable housing target. These were often produced some time ago and are out of date. In my experience, those same consultants have subsequently agreed that most of the individual projects that they have gone on to consider cannot deliver anywhere near 50% or even 35%. In conclusion, the evidence used to support the S.106 affordable housing policies adopted by most Boroughs are out of kilter with what has subsequently been agreed on average by the same consultants who have indicated that 35% or more is, on average, viable. There is a serious 'dis-connect' in this regard and this ideally needs to be considered by all stakeholders. 2.4 The Threshold Approach does not provide a realistic 'incentive' to developers. It effectively implies that developers can either go down Route B (and try and absorb a percentage of affordable housing which is too high) or face complication and delay via Route B (i.e. the viability 'and reviews' path). 2.6 Does this imply that The Mayor discourages the Threshold Approach for schemes under 10 units? Please can the Mayor clarify ! Page15 RouteA Current GLA policy and sound advice from the RICS indicates that, for short term projects, review clauses are not appropriate and, for longer term phased projects, pre-implementation reviews are appropriate. There is no evidence or ultimately constructive sense to have 'near end of development' reviews on short term projects and no need for pre-implementation reviews if a viability exercise has just been gone through. This will seriously damage the ability to fund schemes as, in particular, loan security valuers will not be able to demonstrate adequate loan to value cover and risk cover. Page16 RouteB History tells us that 'delivered' schemes have only contained 13% affordable on average in what has been a rising market. This surely indicates that 35% in what is now a significantly uncertain market is un-sustainable.

2.14 As per my comments earlier, does the Mayor have any up to date evidence testing what 35% affordable typically does to land values across London and how these compare to existing use values and/or whatever might be deemed to be reasonable land values. I believe that this blanket approach will unfortunately damage land supply substantially.

2.15 Whilst the SPG indicates that Route B (i.e. 35% affordable) is not fixed, Route A is equally detrimental to development given the new/extended 'review' proposals.

2.29 Leaving LPA's to choose what affordable tenure (and presumably how affordable that tenure is) will be required on 40% of the affordable housing provision creates uncertainty and is likely to lead to additional viability issues due to that uncertainty and as most LPA's will probably choose the most

affordable (and therefore least valuable) affordable housing tenures.

2.44 More affordable housing would be deliverable if it did not have to be perpetually affordable. Why shouldn't this be an option?

3.1-3.6 Why does the Mayor effectively reject RICS guidance in favour of guidance on viability produced by the Boroughs? The RICS has members that act for private and public sector bodies and has been setting standards and providing advice on property development matters for decades?

3.14 Over the last 2 years, many RPs do not seem to have been interested in getting involved with S.106 affordable housing unless the site has consent. Understandably, they do not wish to waste their limited time resources on something that their organisation may never get an opportunity to own. Furthermore, as an increasing number of RPs are increasingly more focussed on doing private led residential development themselves, the requirement to involve them in financial matters pertaining to a planning application can present serious conflicts of interest. What does the Mayor advise in this regard?

3.33 The Mayor seems to be advising the market how they should assess necessary profit. However, in reality, applicants have to see profit targets based upon how Banks/shareholders etc measure profit and it is not reasonable for the GLA to tell the market how profit should be targeted. In reality, most developers and their funders target profit via profit on cost as a single percentage. They do not split profit between various elements within a scheme. Why is the Mayor trying to tell the market how they should target profit as this will surely lead to artificial viability assessments?

3.42 If thought through logically, EUV or CUV plus land-owner's premium should lead to the same BLV number as the definition of Market Value in the RICS's GN 94/2012.

3.46 In reality, AUV is a substantial influence on the price at which vendors are willing to sell land. Pushing this aside will damage land supply. Why does the Mayor think the EUV+ approach is usually the most appropriate approach for planning purposes? What evidence does the Mayor consider appropriate with respect to justifying the level of land-owner's premium?

3.48 An inappropriate interpretation of the RICS's definition of Market Value can lead to excessively high BLVs. Equally, and indeed more so in practice based upon my experience, viability consultants acting for LPAs can arrive at excessively low BLVs by mis-interpreting and/or not properly justifying (with evidence) EUVs/CUVs plus land-owner premiums. As such, it is unreasonable for the Mayor to not accept the RICS's recommended approach especially as the RICS is, collectively, the most knowledgeable non-political institution with respect to property development, valuation and viability matters in the UK.

3.49 It does not seem reasonable for the Mayor to direct that an AUV approach to BLVs should only be accepted if a planning consent for that alternative use exists. This surely has no regard to reality. Again, with respect to my 'garden shed on 1 acre of land in Mayfair' example referred to earlier, a vendor would not realistically sell that site for £1,200 if there is no planning permission for, say, an office block on the site. However, the scope to obtain a planning consent for office use might be realistic and would/should therefore be reflected in its value. Again, I believe the Mayor's proposed approach in this regard will seriously damage land supply.

3.50-3.54 We have indicated our views on review clauses earlier herein. Compared to the GLA's previous policies on review clauses, no new evidence suggests that it is now appropriate to impose review clauses on single phase relatively short to medium term schemes. Indeed, current and foreseeable market uncertainty connected to Brexit (for example) mean that there is certainly no justification for this more than ever in the current market as it would be highly prejudicial to scheme fundability and deliverability.

4.1-4.15 In simple terms, ‘Build to Rent’ and/or PRS schemes will typically be significantly less able to viably sustain an affordable housing provision as BtR and PRS are generally worth less than unrestricted C3 residential, especially if ‘conditioned’. Is this fully accepted by the Mayor in principle?

User:	University of London

Student satisfaction in London is strongly driven by the living costs in the capital. The London Plan could therefore play a vital role in keeping London attractive to all, home and overseas students. We risk deterring students from studying in London; with long-term consequences for the economic success of the city.

User:	University of London

Demand for purpose built student accommodation (Policies 4.17.1 and 4.17.2)

1. We agree that Purpose Built Student Accommodation should be counted towards a borough's housing target for the reasons outlined in Policy 4.17.1.
2. We also agree with the requirement for 3,500 PBSA bed spaces to be provided annually over the Plan period.

User: University of London

Linking of Purpose Built Student Accommodation with a specified HEI (Policy 4.17.3)

This policy requires that there be an “undertaking in place from initial occupation, to provide housing for students at one or more specified higher education institutions, for as long as the development is used for student accommodation”. This undertaking must cover the majority of rooms.

We support this policy in principle but believe it would benefit from Supplementary Planning Guidance on both the nature of the “undertaking to provide housing”, and the definition of what constitutes an HEI. As a minimum, we believe that an HEI should be defined as a higher education provider which is approved and named on the register maintained by the Office for Students (OfS to be operational from April 2018, replacing HEFCE).

To receive planning permission, there will have to be an agreement in place with an HEI to take rooms within the proposed development. That implies a financial commitment if the HEI is unable to fill the rooms. Since this de-risks the development it, therefore, allows the developer to access cheaper finance. In addition, provided the initial nomination agreement was for more than seven years, they would also benefit from the University’s charitable CIL exemption.

Both of these factors should make it easier to deliver affordable student housing. As charities, HEIs are often risk averse. This policy requires them to take on both demand and construction risks. However, the greater risk is that London becomes unaffordable for students from average and low income backgrounds. The identification of specific areas that could be earmarked for development by Universities, could lower the price of developments and reduce this risk.

Overall, we, therefore, support the policy.

There has been some commentary that smaller HEIs may be disadvantaged regarding their capacity to negotiate the kind of deals necessary to access PBSA. However, the Draft London Plan allows for Consortiums of smaller HEIs to work together on a single development. The University of London enables this at the moment through the system of Intercollegiate halls of residence. This enables our 18 member institutions of significantly variable sizes to access affordable student accommodation for their students.

User: University of London

Affordability of PBSA (Policies 4.17.7 and 4.17.8)

Any definition of affordable rents has to be relative to the income of the group for whom the policy is designed. The cost of London student accommodation ranges at present from less than £90/week to over £600/week, with an average across the capital of £219 per week.

There is a concern that the definition creates a benchmark that, in practice, is going to be difficult to achieve without additional support from the Mayor's Office and Local Planning Authorities.

The affordable criteria currently set at 35% of rooms at £159 pw over 38 weeks (2017-18) requires cheap build costs and cheap land; neither of which are readily available within London.

Given the strategic significance of the HE sector to London's economy, we would hope that land could be identified within the London Plan as suitable for Higher Education use, including Purpose Built Student Accommodation. This would help reduce land costs, allowing us to deliver higher proportions of affordable student housing on new developments.

Without this assistance, the likelihood is that most developments will need, as with residential, to enter into lengthy discussions over the numbers of affordable rooms that are viable. One of our concerns is that the pressure may be to increase the number of rooms that the developer can let directly at high rents (currently an average across London of £282 per week), whilst reducing the numbers of mid-range rooms (typically £175-£195 pw).

We support the policy but feel that, for it to deliver, there is a strong need for additional planning support in the identification of suitable development sites.

User: University of London

Summer lets (Policy 4.17.12)

The cost of developing student bedrooms in London means that for weekly rents to be affordable for students, Universities and private developers often have to work on 51 week contracts. However, the vast majority of our students want accommodation for less than 40 weeks.

Many HEIs with older halls of residence, especially in Central London, are currently able to utilise their halls over the summer months for a wide variety of purposes, including tourism. More recent restrictions on occupancy of PBSA has made this more difficult. The wider use of the buildings outside term-time is entirely appropriate as it benefits local economies, ensures that buildings are utilised to their maximum capacity, ensures that low paid staff continue to be employed over the summer months and also, of course, benefits students by enabling providers to offer cheaper rents during term time.

In order to further enable Universities to deliver affordable housing to students, it is essential that this opportunity to maximise income outside term-time is expanded and supported, through planning permissions that provide the widest possible latitude to HEIs when renting over the summer months.

We, therefore, support the policy, but believe it needs to be strengthened and widened.

User:	Gravesham Borough Council

Student Accommodation

The plan’s acceptance that the local and strategic need (3,500 units per annum across London) for purpose-built student accommodation should be met (pg194) is welcomed, with boroughs being encouraged to develop student accommodation in locations that are well connected to local services by walking, cycling and public transport but away from existing concentrations of student housing (pg193).

The plan emphasises the need for a link with a higher education institution. A formal agreement will be required before initial occupation for the ‘majority’ of rooms.

35% of student bedrooms in the development should be affordable and if the 35% figure is not met, a scheme will then be considered under the Viability Assessment Route (pg195).

User:	Hornsey & Wood Green Labour Party

We support the proposals that these developments should be planned as part of a diverse and inclusive neighbourhood, that accommodation is secured for occupation of students of specific institutions, and that they should be in areas well connected and suitable for walking, cycling and public transport but away from existing concentrations in central London. However we think that the proportion of affordable accommodation should be a minimum of 60% not 35%.

User: James R Brown & Company Ltd

Proposed Draft London Plan Policies H6, H13,
H15, H17 & H18.
Financial Viability Orientated Representations.
1/3/2018
Proposed London Plan Policies H6, H13, H15, H17 and H18 are not justified by robust viability evidence because the evidence in the London Plan Viability Study ('LPVS') is fundamentally flawed and/or wrong.
We assume that there is an onus on the GLA to provide appropriate evidence to justify the proposed London Plan policies and that, where this evidence is missing or lacking, the consequence will be (or should be) that the proposed policy cannot be adopted.
The London Plan Viability Study ('LPVS') is fundamentally flawed and/or wrong because:-
(N.B. We refer to the main body of the LPVS as the LPVS and its accompanying Technical Report as the LPVSTR below).
a) Support or Inform:-
Para 1 of the LPVS Executive Summary says its purpose is to 'support' the new London Plan. However, this implies a fait accompli as surely the main purpose of the LPVS should have been to 'inform' the potential policies in the new London Plan.
As the LPVS is dated December 2017, it would not seem credible that the proposed new London Plan policies were generated almost immediately thereafter. Para 1.2.4 of the LPVS suggests that consultation on the proposed London Plan started at the end of November which pre-dates or almost coincides with the LPVS.
The LPVS appears to have been written to support pre-determined policies in the new London Plan rather than inform policy making which is in-appropriate and undermines its credibility as 'evidence'.
b) Intervention & Justification for 35%:-
Whilst planning policy has been intervening in the affordability and consequential value of housing for some years now, is this fundamentally legal and/or a planning policy matter? What

part of what law permits and/or promotes this?
c) Data Sources, Analysis and Non-Ascertainable Logic through to Conclusion:-
The LPVS/LPVSTR is a very thin on data, detail and analysis.
We have regularly seen more substantial viability reports relating to a single site.
There is no clear audit trail from data to conclusion, especially as there are no explicit financial viability appraisals provided. As such, the LPVR does not represent evidence.
d) Incorrect and/or Misrepresented Data:-
We are familiar with the Savills forecasts on page 16 of the LPVS but the LPVS fails to clarify that these forecasts do not apply to ‘new build’ which London Plan policies are aimed at.
Furthermore:-
? the forecasts listed on page 16 of LPVS are already out of date as most of the cited forecasters have since pegged back their growth forecasts, and;
? the LPVS fails to use ‘independent’ data sources rather than estate agent forecasts (who might wish to avoid gloomy predictions). Forecasts from independent bodies (e.g. MOLIOR) should feature.
Assuming the LPVS has used incorrect and/or has misrepresented base data such as this throughout, the LPVS is not professionally reliable.
e) Build Costs:-
Although the build cost rates are reported to have been produced by Turner & Townsend, this is not evidence in itself. Detailed comparable contract evidence is surely needed to justify these rates to represent ‘evidence’.
In our experience the build cost rates suggested by Turner & Townsend are un-realistically low even if they relate to total scheme GIAs (which the LPVS fails to clarify). If they relate to NIAs The LPVS needs to provide extensive and explicit evidence regarding build costs as, at the moment, the build cost rates used are unclear and un-substantiated.
f) Model:-
Although one cannot see any of the financial viability assessments that we assume the authors of the LPVS have prepared using the Three Dragons/GLA Toolkit, we question why the authors (i.e. The Three Dragons et al) have used the Three Dragons/GLA Toolkit software bearing in mind the vast majority of viability consultants (acting for either Councils and/or applicants) dispensed with this as an inferior model several years ago.

Independent reviews of the Three Dragons/GLA software (e.g. by BNP Paribas) have previously confirmed that it is inferior to software such as ARGUS, so why use it?
We fully expect the appraisals prepared by The Three Dragons et al in the LPVS to contain ‘error equivalents’ as a consequence of the software used which undermines its conclusions.
g) General Approach to Viability Testing:-
The LPVS makes no reference to (and does not appear to have given any consideration to) the RICS’s Guidance Note 94/2012 (Financial Viability in Planning).
The RICS has been the pre-eminent professional institution representing the UK property and development industry for many decades.
To evade guidance provided by the RICS ignores input from most of the UK development industry which is not reasonable and questionable.
Charles Solomon (now head of viability at the GLA) was part of the Core Working Group that produced the RICS GN 94/2012 and so one would reasonably expect viability studies instructed by the GLA to consider it.
h) Approach to BLVs (echoing the Mayor’s Affordable Housing SPG and referred to in notes to proposed London Plan Policy H6):-
The approach used within the LPVS to derive BLVs is misguided and the evidence used is not evidence.
In our opinion, the RICS’s guidance on arriving at BLVs as set out in their GN94/2012 is well thought through and reasonable, albeit unavoidably open to some criticism.
However, certain stakeholders in the planning system are seeking to dismiss the RICS’s guidance in favour of guidance within the Mayor’s Affordable Housing SPG which is open to a lot more criticism.
There is no perfect approach and cannot be for a variety of reasons.
The LPVS has heeded the Mayors guidance on viability and therefore inevitably concludes what the Mayor’s Affordable Housing SPG promotes. This is a major problem as the required approach to viability within the Mayor’s Affordable Housing SPG is echoed within the proposed London Plan (particularly via H6 and Sections 4.6.1 to 4.6.15).
We have already made representations on the Mayors Affordable Housing SPG and its viability guidance and we would re-iterate everything we said therein (see Appendix A).
Via the new London Plan, we feel the Mayor is in-appropriately seeking to politically intervene in

the free market via the planning system by unduly influencing/directing how Benchmark Land Value (‘BLVs’) should be arrived at (whereupon the required approach is also poorly defined). We think the Mayor’s guidance needs to be less prescriptive.

Via Section 4.6.10, 4.6.11 in the proposed London Plan plus the Mayor’s SPG and the LPVS/LPVSTR, the narrative is in danger of practically enforcing the use of ‘EUV plus a land-owner’s premium’ (“EUV Plus”) as the only acceptable approach to BLVs. The Mayor and the proposed London Plan (including numerous references to the Mayor’s Affordable Housing SPG) effectively supress Alternative Use Value (“AUV”) and/or Market Value (as defined by the RICS in their GN 94/2012) as an approach to BLVs.

In reality, land values are ultimately determined by the market and prospective vendors of land will always consider AUVs and Market Value before selling. Meanwhile, purchasers of development land will usually seek to minimise what they need to pay for development land and so it would be wrong to assume that they readily over-pay.

‘EUV Plus’ is poorly defined compared to the extensive/clear definition and explanation provided by the RICS for Market Value in their GN 94/2012. AUV is also poorly defined but is effectively a component of Market Value.

With respect to EUV Plus, the key question is what the ‘Plus’ bit should be? For no apparent or logical reason, the GLA and their supportive consultants keep pointing to ‘20%’ on numerous projects we have worked on but this is arbitrary. It also makes no sense whatsoever on sites that are cleared but have obvious ‘alternative use’ potential.

The Mayor’s Affordable Housing SPG says that land-owner’s premiums “could be 10 per cent to 30 per cent, but this must reflect site specific circumstances and will vary”. This Mayoral SPG wording is in danger of being interpreted to mean land–owner’s premiums should or must be 10% to 30% which is highly problematic and in-appropriate. We think the London Plan needs to absolutely clarify this if the EUV Plus approach is to be endorsed as the preferred approach (and/or used as alternative terminology for Market Value as defined in the RICS’s GN 94/2012).

In reality, the ‘Plus’ percentage or sum (as there is no logic to suggest it should ever be any particular percentage) will or should take the BLV up to the sum that is equivalent to Market Value (as defined by the RICS in their Guidance Note GN 94/2012, as opposed to the ‘Red Book’, and whereupon full regard to planning policy must underpin development land purchaser prices). This may well be via the identification of alternative use development potential.

Some people point to ‘Parkhurst’ as important appeal case precedent on the topic of BLVs.
At the Parkhurst appeal (APP/V5570/W/16/315698) the Inspector considered an SVB of £6.75m to be reasonable even though the EUV was negligible or, at best, up to £700,000. Whatever terminologies one wants to use, the Inspector effectively considered a BLV equivalent to EUV plus 868% as reasonable. This confirms that it is not appropriate or reasonable for the Mayor or any Council to try and claim that a land-owner’s premium should be 20% or within the range of 10% to 30%.
The Mayor’s Affordable Housing SPG requires that landowner premiums are justified and yet, ultimately, there is no way of justifying any particular landowner premium (be it zero, 20%, 300% or £3m) without some kind of reference to land transaction evidence as it is otherwise arbitrary. Whilst the Mayor’s SPG indicates that the level of premium can be informed by benchmark land values that have been accepted for planning purposes on other comparable sites, we do not think this is reasonable. It would not necessarily mean a 20% premium (for example) is reasonable just because 20% was agreed (by way of an incidental ‘equivalent’ percentage) on a neighbouring site. Firstly, it may not have been ‘agreed’ but rather accepted under protest and, secondly, it would be equally reasonable to suggest that if a BLV equivalent to £10m per acre was agreed on a neighbouring site, that £10m per acre should be applied to the subject site – whether this equates to a premium over and above EUV of 20% or indeed 300%. In other words, references to and/or the application of land-owner’s premiums via ‘percentages’ is in-appropriate and the London Plan should clarify this.
Furthermore, AUVs (which are effectively a component of Market Value) should not be supressed by the wording of the proposed London Plan policies and/or by its references back to the Mayor’s Affordable Housing SPG. The London Plan should support the use of an AUV and/or Market Value approach where the subject site is cleared (i.e. with no physical existing use thereon). N.B. We are currently working on a cleared un-contaminated 3.8 acre site in an urban centre in a south-eastern London Borough where a prolific viability consultant to London Boroughs and the GLA is seeking to apply a BLV of £1 based upon EUV Plus. In practice, this is where EUV Plus can lead (i.e. to a nonsense).
A BLV is the most crucial assumption within financial viability assessments and yet contention still exists with regard to how these should be reasonably derived.
There is no meaningful, logical or reasonable evidence supporting the Mayors guidance to

viability. The RICS is apolitical and is surely the appropriate body to provide guidance in this regard.

Returning specifically to the LPVS/LPVSTR, this seeks to use BLVs agreed on certain planning consents by alleging that BLVs in associated S.106 Agreements (e.g. within review clauses) were ‘agreed’.

We believe most of the LPVS BLV examples cited in Annexe J to the LPVSTR are connected to one particular viability consultant who only act for certain Boroughs and who will not negotiate on their approach to BLVs at local level (i.e. effectively EUV Plus only). However, we were involved in some of those projects where we know the BLVs were/are not agreed and that the applicant was practically force fed the EUV Plus approach by the Councils advisor (with the Mayor’s SPG in the background) and where the ‘Plus’ bit has typically been 20% without evidential justification. In some cases, this has led blighted and un-implementable consents.

Furthermore, there are only 35 BLV examples relied upon by the LPVS in Annexe J across only 13 London Boroughs. This is a completely deficient sample size and a fundamental flaw which undermines the LPVS.

Para 2.1.12 in the LPVS confirms that land values (and therefore BLVs) “should be informed by comparable, market-based evidence but excluding transactions above the norm”. The LPVS does not present and has not considered any true comparable market-based evidence. This should reasonably include actual development land transaction evidence and analyses thereof.

i) Profit:-

Para 2.5.6 of the LPVS says its viability testing assumes a ‘private developer’.

Clearly, the identification of reasonably necessary profit targets to private developers is therefore crucial to determining viability.

The LPVS states at Para 2.5.4 that “residential values and profit targets have been compiled by Housing Futures Ltd”.

Having sought to establish what experience Housing Futures Ltd have with regard to residential values and profit targets, there is very little information available on the internet and we cannot find their web site. It appears that Housing Futures Ltd may be a person called Peter Redman who, some internet references say, has ‘worked in social housing for 40 years’ including a number of housing association and local authorities.

With respect, we are concerned that 2 crucial assumptions (i.e. profit targets and values) that

are fundamental to the LPVS's conclusions and London wide planning policy have been 'compiled' by a consultancy that might not have sufficient experience in this regard. Furthermore, it is not clear what 'compiled' means in context. Have they determined what reasonable profit targets are?

The LPVS makes no mention of having gathered any evidence from Banks, financial intermediaries, equity and mezzanine financiers/funders with regard to what they need to see as prospective development profits in order to satisfy their conditions precedent to lending across a variety of property types and development risk profiles. If this evidence has not been obtained and considered as part of the LPVS, the LPVS cannot be credible as, without funding, development cannot happen.

At the moment, we are not convinced that sufficient evidence has been obtained and analysed to determine what a reasonable/necessary development profit is across the various housing, quasi-housing and mixed-use development projects considered within the LPVS because it is not apparent.

j) Finance Costs:-

Table 5.15 (page 34) in the LPVS indicates that the GLA have instructed the authors of the LPVS what finance rates to use. Surely the authors of the LPVS should produce evidence and express a justified opinion in this regard? This is not evidence.

Although Table 5.14 suggest that the GLA have evidence to support the instructed finance rates, we have looked at 'The Value, Impact and Delivery of Community Infrastructure Levy' (University of Reading, Three Dragons, Smiths Gore and David Lock Associates – Feb 20127) for example but see nothing in there that represents evidence to support any particular finance rate assumption.

Our experience of finance rates to the average hypothetical developer is that they are significantly higher than the GLA are suggesting including finance facility fees (which should not be ignored). Up to date explicit evidence is required regarding finance cost assumptions before the LPVS can be considered credible in this regard.

With respect to footnote 50 on page 34 of the LPVS, it is not appropriate to spread land finance costs over half the development period as professional development valuers would confirm. It is usually reasonable to spread finance costs on construction in this way because construction costs are indeed spread over the development period. However, finance costs on land

compound from the day of purchase and usually continue compounding until the end of the development (or close to) unless the development is substantially phased (which is rarely the case with student accommodation development). This indicates that, in all likelihood, the results from the LPVS's viability testing of their 2 student development archetypes are wrong for this reason alone.

In conclusion, finance rate/cost assumptions significantly affect viability tests and yet the LPVS provides no evidence in support of its assumed rates/costs and has also applied them incorrectly with respect to land finance. This undermines the LPVS's conclusions regarding student accommodation development.

Proposed London Plan Policy H17 should not be adopted for this reason.

User: Mr Gary Hayes

H17 Purpose-built student accommodation

17.1 We propose that the following be added to this policy

? Student housing should not compromise capacity to meet the need for conventional homes (particularly social / low cost rented homes).

? New student housing should be avoided in boroughs that already have the highest concentrations: Camden, Islington, Southwark and Tower Hamlets – identified in the last London Plan and any other boroughs that may also have very high levels of studentification.

? There needs to be a way of measuring where development of student housing does / doesn't contribute to delivering mixed and inclusive neighbourhoods.

User: Andrea Carey Fuller

We propose that the following be added to this policy

- Student housing should not compromise capacity to meet the need for conventional homes (particularly social / low cost rented homes).
- New student housing should be avoided in boroughs that already have the highest concentrations: Camden, Islington, Southwark and Tower Hamlets – identified in the last London Plan and any other boroughs that may also have very high levels of studentification.
- There needs to be a way of measuring where development of student housing does / doesn’t contribute to delivering mixed and inclusive neighbourhoods.

User: Kingston First

Aside from traditional housing, the draft Plan also has regard to purpose-built student accommodation and acknowledges that it is a 'specialist' form of housing and a need which must be addressed properly.

The education sector is an important part of Kingston Town Centre, as it is home to both Kingston University and Kingston College. Private student accommodation within the borough has historically been of a low quality, and a lack of supply has affected its affordability. Kingston First supports the wording of draft Policies HI7 and HI8 and the need to plan for affordable, appropriately sized accommodation for students.

User: Elephant Amenity Network

H17 Purpose-built student accommodation

We propose that the following be added to this policy
• Student housing should not compromise capacity to meet the need for conventional homes (particularly social / low cost rented homes).
• New student housing should be avoided in boroughs that already have the highest concentrations: Camden, Islington, Southwark and Tower Hamlets – identified in the last London Plan and any other boroughs that may also have very high levels of studentification.
• There needs to be a way of measuring where development of student housing does / doesn't contribute to delivering mixed and inclusive neighbourhoods.
Additional Policy – Co-operative / community led housing.

We propose that the Mayor should
(i) work with existing, newly formed or developing London-based co-operatives, TMOs and CLTs to assess their existing and future potential (including resources and capacity) to develop new social / low-cost rented homes;
(ii) with the boroughs, identify and set aside public land that might be available to them to deliver community led housing;
(iii) with the boroughs, develop a London-wide list / online map of potential small development sites to match co-operatives / community led housing organisations with available development sites (particularly public land) for homes that will remain in perpetuity at costs that can be afforded by households of below median income levels;
(iv) provide support social housing tenants who wish to manage or collectively own their own homes.

User: London Borough of Camden

The Council acknowledges the huge economic and employment role of higher education in the Borough, and supports the provision of additional residential accommodation for higher education students. The Council generally supports Policy H17, which is consistent in most respects with the approach to student accommodation set out in the Camden Local Plan 2017.

However, the Council is concerned that the providers of student housing will consider the requirements of Policy H17 to be unduly onerous compared with the requirements of the London Plan as published with amendments in March 2016. The 2016 London Plan required student accommodation to subject to nominations agreements with one or more institutions, or to provide an element of affordable student accommodation, but not both. Policy H17 requires in all cases that the majority of bedrooms should be subject to nominations agreements and the scheme should provide 35% affordable student accommodation.

Supporting paragraphs indicate that where the accommodation is not subject to nominations agreements, it will be considered as large-scale purpose-built shared living.

The Council is concerned that this doubling-up of requirements may deter further investment in purpose-built student housing, and divert it into general purpose shared housing available for short-term lets (this is an emerging model, e.g. see www.thestayclub.com). The unintended consequence of the additional requirements could be a worsening supply of dedicated student housing relative to demand, and a 'casualisation' of student accommodation arrangements where students compete with young professionals, working visitors and tourists to let rooms on a short-term basis.

We accept that where affordable student accommodation will be provided, this could helpfully be linked to one or more specified institutions to provide a simple mechanism for identifying suitable occupiers who will benefit from reduced costs. However, where the affordable accommodation is in place, we don't consider that it is necessary for the remaining accommodation to be tied to specified institutions.

We therefore propose that Criteria A(3) and A(4) should be amended to form either/ or options, with A(3) providing for all the accommodation to be linked to specified HE institutions, and A(4) providing the alternative of at least 35% accommodation secured as affordable and allocated to suitable occupiers (e.g. by linking the affordable accommodation to specified HE institutions).

We also note that Criterion A(3) indicates that the accommodation should be occupied by members of one-or-more specified HE institutions, whereas paragraph 4.17.3 states that the majority of bedrooms must be covered by such an undertaking. These provisions are not consistent, especially bearing in mind that 'the majority of bedrooms' could refer to as few as 51%. If Criterion A(3) can be satisfied by less than 100% of bedrooms being tied to specified HE institutions, the minimum acceptable percentage should be specified in paragraph 4.17.3.

User:	London Borough of Camden

Paragraph 4.7.12 provides for student accommodation to be used on a temporary basis by other occupiers during vacations, subject to conditions ensuring that there is no material change of use of the building. We note that paragraph 6.10.4 also supports the use of student halls as visitor accommodation during university vacation periods, but adds the proviso that the accommodation should be in appropriate locations and the use should not disrupt the daily lives of resident students and their academic calendar. We consider that this helpful guidance should also be incorporated in paragraph 4.7.12, or cross-references and links should be provided to connect paragraphs 4.7.12 and 6.10.4.

User: Barts Health NHS Trust

Draft Policy H17 – Purpose-built Student Accommodation

The Trust supports the general aims of the policy to ensure that sufficient purpose-built student accommodation can be delivered to meet London's needs.

The Trust, however, objects to the explanation of how this policy is intended to be operated (paragraph 4.7.13).

The Trust operates major teaching hospitals and this role in part relies on the availability of suitable accommodation for students and national, international postgraduates or visiting academics. Some Trusts are offering skills or training academies in their own name and it is something Barts is actively pursuing. It is not always the case, therefore, that such accommodation will or need be linked to a higher education institution.

We request that greater flexibility be included in the operation of this policy so that other public institutions / organisations can deliver student accommodation on their own account.

User: Pat Turnbull

Policy H17 Purpose-built student accommodation

Again, this entire section needs a rethink. This type of accommodation with this amount of leeway for developers will deliver yet more tiny and expensive student accommodation.

User: Balfour Beatty

Purpose Built Student Housing Policy H17 - Purpose-built student accommodation London's student population is critical to London's economy in both making an important contribution towards housing supply and to supporting London's position as the global leader in higher education. Balfour Beatty therefore supports the recognition in paragraph 4.17.1 of the contribution that student housing can make towards meeting London's overall housing need and, specifically, that it will be recognised as contributing towards meeting borough housing targets, at a ratio of three beds per single home. It also supports the provision of 3,500 bed spaces per annum across London, as identified in paragraph 4.17.2. That this requirement is a minimum figure and more can be accommodated should be confirmed. The confirmation in paragraph 4.17.12 regarding the temporary use of student accommodation is also welcome. This will provide much needed short-term accommodation within London. This support is based on the assumption that there is no affordability requirement in relation to any temporary uses.

However, we do not support the requirement of proposed Policy H17 A3, that PBSA providers must secure occupation agreements with HEIs prior to the receipt of planning. Most HEIs are either unable or unwilling to commit to a scheme at such an early stage in the development process. Therefore, this limits the provision of PBSA to only the largest HEIs, which are more likely have the considerable resources and capacity required to be able to commit prior to the submission of a planning application. We believe that this policy is too restrictive and could harm the delivery of PBSA and increase the pressure on general needs housing. Indeed, no evidence has been made available in support of the Draft New London Plan that demonstrates engagement with HEIs or their support for this requirement. In relation to the requirement in proposed Policy H17 A4, for 35% of PBSA bedrooms to be 'affordable student accommodation', we believe that this will limit the amount of development. The evidence base for this requirement, set out in London Plan Viability Study (December 2017), appears to be very limited, with only two schemes having been tested. The existing policy on PBSA was only adopted two years ago in the Further Alterations to the London Plan (2015) and it seems that changes to this policy position are being advanced without proper knowledge of how the existing policy is working on the ground, especially in terms of their impact on development viability. The impact of this will, in our view, be counterintuitive in delivering more affordable PBSA by way of restricting supply that will more than certainly push up rents on existing accommodation. Furthermore, there are no established provisions to ensure that PBSA rooms that are designated as affordable will be properly managed and occupied by those students who are most disadvantaged financially.

Policy H18 Large-scale purpose-built shared living

User:	Southern Housing Group

Support -

The group supports the provision of co-living schemes, as long as they are in the right location, with sustainable management plans and clearly identified demand.

User:	Centre for Accessible Environments

Object -

No information is contained on whether these type of dwellings would be accessible to disabled people wishing to work and live independently as part of a shared community (different from supported living). Would these type of dwellings meet some of the requirements of M4(2) and M4(3) dwellings?

User: Apeiron Capital Limited

Object -

1. On behalf of our client Apeiron Capital Limited we write to submit representations to the Draft New London Plan 2017, and specifically Policy H18 – Large scale purpose built shared living.
2. We broadly support the principles of the policy and are pleased that the purpose built 'shared living' model of housing has been recognised in the Draft New London Plan ('the Plan').
3. The target market for this type of housing is likely to be early 20s – late 30s, though not exclusively. In terms of housing for this demographic, research undertaken by JLL confirms that location and cost, along with local amenities have higher priority above the size of accommodation. As such, the opportunity exists to deliver smaller but still high quality homes for Londoners, at a price that can be afforded.
4. As the Mayor will recognise, there are large (and growing) parts of society that do not qualify for social or intermediate housing and cannot afford to buy, or even rent a standard sized home alone in London. This means that increasing numbers of Londoners are being required to share accommodation in the private rented sector, where the challenges that renters face are well documented. The purpose built professionally-managed shared accommodation model offers one solution to this issue.
5. Not only are these developments properly managed, but where 'private' units (as defined at paragraph 4.18.6 of the Plan) are proposed as part of a larger shared living development, these allow people the opportunity to live alone if they want to; something that may not be an option with conventionally sized housing.
6. As a new housing typology there is currently a policy vacuum, with no clear or consistent guidance being provided to developers. Whilst it is right that the Plan comments on this form of housing, supporting it in principle, we question the need for such detailed policy at the strategic level. Policy H18 should therefore be revised to set the broad principles to guide development in this sector and an SPG providing the detailed guidance should be prepared separately.
7. If Policy H18 is to remain detailed, then much greater clarity is required, as set out below.
8. In Part A, the policy states *"where of good quality and design, may have a role…"* The reference to good quality and design needs clarity. For example, the size of a unit is not a prerequisite for 'good design'. In other high density global cities such as Tokyo and New York, smaller apartments are the norm. It is therefore possible to deliver small units that incorporate innovative design and layouts, and that allow people to maintain high standards of living. We would welcome specific design guidance against which to assess development proposals, and this would ensure consistency across London.

9. The Draft Plan is required to be drafted in a positive way. For that reason, and given the need to speed up housing delivery and to offer a range of housing typologies to suit a range of budgets, it is clear that shared living *does have* a role to play in meeting London's housing need. The policy should be amended accordingly.
10. We support Part A, Sections 1-4 and 5 a-e, but consider that Part A, Sections 5 f and g are too restrictive, lack clarity and are unenforceable. As such they should be deleted from the Plan.
11. It is not clear what is meant by *"community management"* and question the need for such a representative(s) within a shared living development. Whilst some operating models may want to invest in this, others may take a more organic approach to developing and managing the community for example, by the provision of high quality spaces that promote interaction and the natural growth of a sense of community. Providing a community manager is likely to add to the service charge of the building, putting up rents and potentially achieving very little. This aspect of policy is therefore considered unnecessary and counterproductive and should be deleted.
12. In respect of bedding and linen services, whilst we understand that for some residents this may be beneficial, in reality this would be an additional cost within the service charge and therefore increase monthly rents. Equally, residents should not/cannot be restricted on the type of bedding they use in their permanent residence.
13. Part 1, Section 6, lacks sufficient clarity to be a sound policy. The word "adequate" is subjective and should be deleted. Again, more detailed guidance on design standards should be provided as an SPG by the Mayor to set out the broad requirements for functional living space and layout.
14. In terms of what is classed as "demonstrably not C3", this requires much clearer guidance in the policy and in a supporting SPG. To be Use Class C3 requires a unit to be "self-contained". Within planning law, this is a concept that is open to interpretation.
15. There are varying models of shared living, with some developers providing a bedroom to an individual but with all other facilities shared; whereas others are seeking to provide the essential functions for domestic existence within a single unit. We would suggest both fall outside of Use Class C3 as some facilities such as dedicated living space and a fully fitted kitchen and bathroom are lacking, and in all cases there are various residential functions being shared with others. Paragraph 4.18.6 supports these typologies, terming the more fully fitted unit as "private". We welcome this, but suggest that guidance is required by way of SPG to define what the Mayor would consider to be Sui Generis.
16. Without this guidance the policy would lack clarity, include contradictions, and therefore be unsound. Equally, debates over whether proposals are Sui Generis or C3 would slow delivery rates and ultimately harm the Mayor's primary ambition of speeding up housing delivery in London.
17. Part A, Section refers to the requirement for a cash in lieu payment to offsite affordable housing provision. We are aware of the representations that the British Property Federation has submitted and fully support these, particularly in respect of affordable housing.

18. Whilst the principle behind this is understood, the level of contribution sought is likely to prove unviable in the majority of cases where large scale high density shared living accommodation is proposed. As such, we are concerned that at a time when it is important to speed up housing delivery and broaden the range of housing products available, the proposed policy will deter investment in this sector, which has so much potential to assist with tackling London’s housing need.

User: Ms Meenakshi Sharma

Large scale purpose built shared living.

4.18.2 Development proposals for such schemes should only be supported where they meet an **identified market need**.

How is this need going to be identified? Is it pan London or specific to the borough? Safeguards are needed that all parts of the borough will have such accomodation not just the poorer areas.

User: Ms Meenakshi Sharma

4.18.6

The **private units** should be appropriately sized to be comfortable and functional for a tenant's needs and may include facilities such as en-suite bathrooms and kitchenettes. There are currently no minimum space standards for these units. Given the generally small size of the private space in these developments, the communal amenity spaces are important elements in ensuring the quality of the overall residential amenity is acceptable. If deemed necessary, the Mayor will produce planning guidance, including space standards, for this form of accommodation.

The planning guidance is absolutely crucial. Is the Mayor not aware of the overcrowding that is going on in the poorer parts of London and the advantage developers big and small are taking of the inflated prices to justify unhealthily small living spaces?

User: SAV Group

General points

SAV Group welcomes the inclusion of a policy dealing with large-scale purpose-built living. Notwithstanding, we have a number of specific comments.

First, we note that Policy H18 says:

'Large-scale purpose-built shared living Sui Generis use developments … may have a role in meeting housing need in London…'

In our view, this type of housing undoubtedly has a role in meeting housing need, offering high quality accommodation with a range of facilities and services not found in other forms of residential products. The policy should recognise that role.

Second, the policy says that schemes must meet 'an identified need' (and at paragraph 4.18.2 there is a suggestion that they should meet 'an identified market need'). There is no justification for this test. If there is no market for the product, the product will not be built.

Third, the policy says that units must be for rent for periods of no less than three months. That seems unreasonable, given that C3 units in London may be let for periods of less than 90 days.

Fourth, the policy proposes a minimum level of facilities and services which is, in some cases, excessive and beyond that required to distinguish large-scale purpose-built living from C3 developments.

For example, there should be no obligation to provide bedding and linen changing and/or room cleaning services. That is an option which some operators may wish to provide, but there is no credible reason for it to be required.

We also note that the policy says that units must demonstrably not be C3 accommodation. With that in mind, we are pleased to see the confirmation in paragraph 4.18.6 that units may include en suite bathrooms and kitchenettes, as what sets apart large-scale purpose-built shared living schemes from C3 developments is the presence of communal facilities and services, not the absence of en suite bathrooms and kitchenettes in individual rooms. These communal facilities and services will vary from scheme-to-scheme, but may include lounge areas, television/cinema rooms, libraries and laundry rooms, as well as kitchen/dining areas.

The policy should be amended to address these concerns.

Affordable housing

Policy H18 says that developments are expected to provide a contribution that is equivalent to 35 per cent of the residential units to be provided at a discount of 50 per cent of the market rent. Notwithstanding the form that that contribution takes (see our comments on paragraph 4.18.7), we are concerned that the analysis which informed preparation of the London Plan (London Plan Viability Study, December 2017 and the associated technical report) has a number of shortcomings, which may make the affordable housing targets unrealistic.

For example, as the study concedes, shared living is a relatively new product type. As a result, the authors of the study were forced to rely, in the main, on historic rental data. In addition, the study tests only a 300-unit scheme, whereas Policy H18 applies to schemes from 50 units upwards. That approach is likely to skew the analysis in favour of larger schemes. Finally, the assumed benchmark land values appear to take little account of the fact that the policy requires large-scale purpose-built living schemes in areas with high PTALs.

The policy should, therefore, offer greater flexibility in negotiating affordable housing.

User:	SAV Group
Paragraph 4.18.2 says that large-scale purpose-built living schemes should meet ‘an identified market need’. There is no justification for this test. If there is no market for the product, the product will not be built	

User:	SAV Group

Paragraph 4.18.3 says that tenancies in large-scale purpose-built living schemes should be for a minimum of three months. That is, in our view, unreasonable, given that C3 dwellings in London (which serve a similar role to large-scale purpose-built shared living) may be let for periods of less than 90 days in a calendar year.

User: SAV Group

Paragraph 4.18.4 says that a management plan must be produced and that it must include detailed information on a range of items. Some of these items go beyond what should reasonably be required. Specifically:

- It is not always feasible or necessary to provide linen change and private room cleaning services. Moreover, doing so is likely to make some shared living schemes unviable
- An on-site staff presence should not always be necessary, especially in the future as technology develops to allow, for example, increasingly secure access to buildings and drop-off of parcels.
- The provision of community events implies that all shared living schemes should seek to ‘manufacture’ a community, when that may not be what residents are seeking.

Moreover, it is not appropriate to use a section 106 agreement, as paragraph 4.18.4 proposes, to identify the number of on-site staff and their proposals. That implies that, for example, a change in staffing arrangements would require either a variation of the legal agreement or the resubmission of the management plan required by the section 106 agreement. That is an unnecessary and unreasonable burden to place on the operator of a shared living scheme.

User: SAV Group

Paragraph 4.18.5 says that ‘an on-site community manager should help to organise events to encourage social interaction between residents’. That implies that all shared living schemes should seek to ‘manufacture’ a community, when that may not be what residents are seeking. The reality is that many shared living schemes will provide for people who want to live ‘alongside’ other people, but not necessarily ‘with’ other people in an artificially created community.

In any case, residents will be perfectly well able to arrange events between themselves if they so wish, using information on noticeboards, social media and word of mouth. It is easy to envisage a resident starting a book club, for example, and that need not require a staff member to organise.

The requirement for an on-site community manager to organise events should, therefore, be deleted

User: SAV Group

Paragraph 4.18.7 says:

‘[B]ecause it does not meet minimum housing space standards and generally consists of bedrooms rather than housing units, [large-scale purpose-built living] is not considered suitable as a form of affordable housing itself.’

The logic for this is unclear. What is acceptable for market housing occupants must surely be acceptable for affordable housing occupants. It must therefore, be possible (at least in principle) to consider large-scale purpose-built shared living as a form of affordable housing.

That said, whether affordable housing should be provided on-site or in the form of a payment in lieu should be by agreement and on a case-by-case basis, in order to take account of the particular circumstances of the site. Such an approach would be consistent with the Government’s Planning Practice Guidance, which notes (paragraph 006; reference ID 23b-006-20140306):

Where local planning authorities are requiring affordable housing obligations ... they should be flexible in their requirements. Their policy should be clear that such planning obligations will take into account specific site circumstances

User: SAV Group

Paragraph 4.17.8 (sic) says:

‘A borough can decide whether it would prefer the financial contribution as a single upfront payment for affordable housing … or an ongoing in perpetuity payment linked to actual rental income.’

Notwithstanding our comments on paragraph 4.18.7, this should, ideally, be by agreement and on a case-by-case basis, in order to take account of the particular circumstances of the site. Such an approach would be consistent with the Government’s Planning Practice Guidance, which notes (paragraph 006; reference ID 23b-006-20140306):

Where local planning authorities are requiring affordable housing obligations ... they should be flexible in their requirements. Their policy should be clear that such planning obligations will take into account specific site circumstances.

This should be reflected in the text.

User:	Dolphin Living

Support -

Dolphin Living support the recognition of purpose built shared living and how it can aid the delivery of housing supply in London.

Discounted rents in this sector can help to provide housing that is affordable to elements of London's population that may not qualify or be able to affordable some affordable housing products (i.e. shared ownership or larger unit type intermediate rental housing).

We experience great demand from single persons on low to middle incomes, some of which could be adequately housed in shared accomodation.

User:	Inclusive Design and Access Panel
H18 – Object, D5 accessible housing should be reflected in this policy.	

User: First Base Limited

Build to Rent

The Build to Rent (BTR) sector has an important role in seeking to deliver additional supply within London and we are pleased to see the Mayor, through this draft Plan, produce specific policies to support BTR developments and the Mayor's commitment to the sector in general.

First Base support the ambition to encourage more institutional investment within the sector contained within the Plan and the predecessor SPG, and particularly welcome the fact that the affordable housing component can be set at discount market rent.

However, we are firmly of the view that applicants and LPAs should have the freedom and flexibility to determine the most appropriate rental mix in order to support the viability of scheme on a site by site basis. This is especially the case in outer London, where we have already stated concerns over the universal adoption of the affordable housing threshold, as well as the fact that this is a new market, with relatively few BTR schemes so data is not robust enough to justify a percentage.

Also, we would also wish to promote a flexibility of approach as regards the interpretation of planning policy to support BTR, especially with respect to:

- Higher density development
- Unit mix and space standards
- Innovation in design, especially with regard to Modern Methods of Construction (MMC)

These must be considered, whilst keeping the main focus on delivering a quality product irrespective on tenure type.

Minimum space standards within residential development

Whilst we recognise the drivers behind the desire to see a uniform series of space standards applied across London, we again believe that there should be a greater flexibility of approach as regards the setting of space standards, especially within in the context of large-scale purpose-built shared living accommodation and the BTR.

Of course, this is not to suggest that we wish to see an erosion of those standards, we are of the view that London can only meet the challenge of delivering significantly enhanced and sustained housing growth by allowing applicants, in conjunction with LPAs, to be able to provide greater choice for the growing and diverse London population. By providing homes at a range of sizes that are targeted at a broad range of income levels, we can help to deliver a more deliver more balanced community and offer more choice. It also allows developers to maximise delivery on a site by site basis and positively contribute to addressing the housing crisis.

User: Putney Society

Policy H13 – Build to rent
Generally we welcome a properly set up build to rent market rather than individual small landlords, but
H13.B 50 units is too high a limit.
Well managed HMOs (4.12.7) along the lines of six bedrooms and shared dining / kitchen often provided in new student accommodation is a model that should be explored for other young singles.
Policy H17 – Purpose built student accommodation
H17.B Student accommodation needs to be located close to where they study, not spread about. Short commutes and being close to your friends matters here. Otherwise students will price out families from local 3 bedroom and bigger houses.
Students have cars too. Not recognising this is causing real problems in Roehampton.
Policy H18 Large-scale purpose-built shared living

See comments above for H13, H17, & H18.
This level of services would be expensive to provide. There is potentially demand too for those who can do their own cleaning etc.

User:	Annington Homes
Policy H18 – We are supportive of Policy H18 which applies to large-scale purpose-built shared living developments.	

User: Royal Borough of Kensington and Chelsea

Support -

4.16 Policy H18 Large-scale purpose-built shared living

The Council supports Policy H18 but the policy as currently drafted does not provide enough clarity on management issues. The supporting text at paragraph 4.18.2 seems to be more suited for policy but the supporting text needs to clarify how such market need will be identified. It is unlikely that borough level SHMAs would have a separate classification for this. It is important to ensure quality of these schemes by specifying some minimum space standards as there is a concern that contrary to the aims of the policy, sub-standard accommodation could be created which could be out of date with housing standards that are continually evolving. Further guidance should be incorporated in an SPD/SPG through perhaps an update to the Mayor’s Housing SPG.

User: Get Living London

Overall GLL supports the inclusion of a London Plan policy which recognises that purpose built shared living has a role in meeting unmet housing need. It is however considered that the policy, as presently drafted, only provides very weak support for purpose built shared living and should therefore be strengthened to ensure this type of housing is delivered.

Specific Amendment Sought

GLL considers that Policy H18 should be amended to replace *'may have a role in meeting housing need in London'* with *'does have an important role in meeting housing need in London'* to ensure the plan is effective.

User: Get Living London

The requirement for these developments to contribute to a mixed and inclusive neighbourhood is open to misinterpretation and could be used to resist this type of development. As there are very few neighbourhoods which contain purpose built shared living already, its proposed development will almost certainly contribute to a more mixed and inclusive neighbourhood.

Specific Amendment Sought

GLL considers that Policy H18 should be amended to delete *'the development contributes to a mixed and inclusive neighbourhood'* to ensure the plan is effective.

User: Get Living London

Purpose built shared living can provide good quality, professionally managed housing which is affordable to the increasing number of households who are unable to afford to buy or rent good quality housing locally but are also unlikely to be eligible for council allocated housing. There are unlikely to be any locations in London where this type of housing would not meet an identified un-met housing need.

Specific Amendment Sought

GLL considers that Policy H18 should be amended to delete Policy H18 A (1) and para 4.18.2 to ensure the plan is effective.

User: Get Living London

The requirement to demonstrate that homes are not C3 Use Class is open to misinterpretation and could be used to resist this type of development. It is also unnecessary given the other requirements of this policy would result in a development which is, by virtue of its shared facilities, not C3 use class.

Specific Amendment Sought

GLL considers that Policy H18 (6) should be amended to delete *'and demonstrably not C3 Use Class accommodation'* to ensure the plan is effective.

User: Get Living London

Whilst clarification that any contribution towards affordable housing should usually be provided as a payment in lieu of on-site delivery is welcomed, it is considered that there should be flexibility for on-site delivery if this is otherwise agreed between the applicant and the local authority.

Specific Amendment Sought

GLL considers that Policy H18 (8) and para 4.18.7 should be amended to include *'unless otherwise agreed between the applicant and the local authority'* to ensure the plan is effective.

User: Get Living London

Flexibility for an upfront payment or an annual payment is welcomed. It is however considered that policy should not enable the payment to exceed the financial equivalent of 35% on-site affordable housing. An obligation resulting in a greater payment than policy would otherwise have required would fail the statutory legal tests for planning obligations as confirmed in National Policy and the 2010 CIL regulations.

Specific Amendment Sought

GLL considers that Policy H18 (8B) should be amended from *'an in perpetuity annual payment to the local authority'* to *'an annual payment to the local authority for an agreed period of time'* to ensure the plan is consistent with national policy.

User:	Get Living London

Whilst GLL welcomes the inclusion of a fast track route, it has not been adequately evidenced that a contribution equivalent to 35% on-site delivery at 50% of market rent would enable this type of development to remain viable and deliverable.

User: London Borough of Islington

Draft London Plan Policy

Policy H18 Large Scale purpose-built shared living

Islington Response

Policy H18 is less permissive towards this type of development than build to rent, but it does open up an avenue for this type of development to be delivered We have significant concerns about the affordability and quality of accommodation for large scale shared living, as well as the impact that such developments have on the achievement of mixed and balanced communities, which will continue to be a priority for Islington. The supporting text recognises the significant flaws with this type of development, yet the policy is still broadly permissive.

Further, there is a real concern that this type of development will push land values up in a similar way to student accommodation in the past, as they are not required to comply with normal standards or provide on-site affordable housing. The policy should be amended to explicitly prioritise conventional housing above large-scale purpose built shared living, to ensure that applications on sites capable of delivering conventional housing (and therefore on-site affordable housing) will not be permitted.

If the Mayor continues with this policy, it is imperative that the additional guidance mentioned in para 4.18.6 is produced ASAP. This type of development will be of a much lower quality than comparative conventional dwellings, therefore any additional mechanism to improve quality should be put in place.

User:	Barton Willmore

This policy is supported by CHL on the basis that it supports purpose building shared living accommodation.

We are, however, concerned that providing the equivalent of 35% of these lower-rental units as an off-site financial contribution in-lieu of an on-site affordable housing provision will make these schemes unviable. The policies reference to the submission of a viability assessment must remain in this policy.

User: Galliard Homes

Galliard supports the Plans acknowledgement of shared living under Policy H18 – Large-scale purpose-built shared living, but feel that the Plan is missing a trick in respect of affordable housing. How can the Plan, under Policy H17 – Purpose-Built Student Accommodation, part A(4), accept `at least 35% of accommodation is secured as affordable student accommodation as defined through the London Plan and associated guidance'; but not make a similar provision for shared living!

In essence, shared-living has sprung from the success of more recent student accommodation schemes, where students are provided with private accommodation usually including their own shower room, kitchenette, living and sleeping quarters, with access to wider on-site communal facilities. Shared living is designed for the entrepreneurial young single professional who wants independence, all-inclusive bills within a social communal environment.

We recognise and do not disagree that shared living can have a different land use allocation other than Use Class C3 (dwellinghouse), however we disagree if the Plan is the tool to do that; and with part A(8), and feel that on-site affordable housing can be provided in a similar manner suggested under Policy H17, part A(3). This should not be discounted as a source of affordable housing provision.

User:	City of London Corporation

The City Corporation welcomes the policy guidance on shared housing, but the requirement for affordable housing should be determined locally in light of local evidence, rather than having to comply with the London-wide 35% requirement.

User:	London Waste and Recycling Board (LWARB)

We suggest policy H18(5) – Large scale purpose built shared living, could be expanded to include communal facilities, such as kitchen space with storage for recyclables, food waste and residual waste and access to commonly used household items for sharing (for example the “Library of Things” concept).

User:	London Waste and Recycling Board (LWARB)

We suggest the management plans detailed in paragraph 4.18.4 should include plans to maintain white goods provision on service contracts which include maintenance and repair, and how waste storage areas will be maintained.

User:	London Waste and Recycling Board (LWARB)

1. If the Mayor issues planning guidance for this form of accommodation as mentioned in paragraph 4.18.6 we would welcome the opportunity to input to the development of the guidance.

User: London Borough of Lambeth

As stated under policy H13, the clear distinction between Build to Rent and this form of development is welcome. However, Lambeth is very concerned about the blanket support given by the draft new London Plan to large-scale purpose built shared living as a form of development. It will always be possible for a developer to claim that this type of accommodation meets housing need – because the level of unmet housing need in the capital is so extremely high. This does not make this the right or best way to meet that need. This form of development represents a severe erosion of housing quality and standards, contrary to the otherwise hard fought for standard of accommodation secured by local planning authorities in other housing developments. Support for this type of scheme also directly contradicts the statement (supported by Lambeth) in draft Policy H12 that schemes of mainly one-person units should be resisted. These concerns are made worse by the rent levels typically charged in this type of development, which are no lower than and sometimes exceed rents for rooms in shared houses in the same area.

Boroughs must be given scope in their local plans to set clear parameters for the circumstances in which this type of development might be acceptable – beyond the weak criteria listed in the draft London Plan policy. As an example, boroughs need to be able to set criteria around meeting local need and/or demonstrating a local connection. Otherwise, boroughs like Lambeth will experience a rash of this type of scheme and will not have the power to resist it. Along with housing quality, the inevitable casualty will be the amount of general needs affordable housing secured through the planning system and the genuine mix and balance of communities. Over-reliance on cash-in-lieu contributions for affordable housing from schemes like this will result over time in a polarisation of communities on the basis of income, which contradicts the draft London Plan’s own ‘good growth’ objective to build strong and inclusive communities.

User:	Bexley Labour Group

The group agree with a degree of encouragement for ‘shared living’ developments. Ensuring that we create and build truly mixed tenure communities.

User: London Borough of Haringey

The Council supports this policy although considers the Policy should include locational criteria setting out where such development would be more appropriate. It should also seek to avoid clusters of this particular typology dominating the provision of new housing within an area. Lastly, it should also expressly set out that such development should be car-free. The above will assist in avoiding proposals coming forward in quiet residential suburban streets resulting in unacceptable impacts on the existing residential amenity.

The Council would encourage the Mayor to produce guidance for this form of residential accommodation. This should provide guidance on minimum standards, a ratio to determine a satisfactory level of communal space, and design.

User:	London Borough of Lewisham

We support H18 and recognise shared living as meeting a niche in the housing market.

However, shared living schemes must be of sufficient quality, meet needs, be well located and connected, be well managed and provide minimum tenancy lengths and provides payment towards affordable housing too. We have a number of successful small schemes but there are concerns about large schemes providing substandard accommodation if they are not managed effectively. We note that some of the requirements are overly prescriptive e.g. concierge, linen changing and room cleaning. We also recognise that monitoring and enforcement responsibility resides with the Council and could prove time-consuming.

User:	London Borough of Brent

The Borough supports the policy in principle. The emphasis on "where of good quality and design" is key to its success or not.

User:	London Borough of Bromley

The Council notes the policy. The supporting text should clarify the contribution of Large-scale purpose-built shared living to the housing target figures in line with the draft London Plan Policy H3C.

User: London Councils

London Councils is supportive of the Mayor’s position that large-scale purpose-built shared living development should be considered as Sui Generis in the planning system. Individual boroughs should make decision whether this type of development is appropriate within their areas and whether it can play a role in meeting housing need.

The criteria for large-scale purpose-built developments set out in the policy are clear and can be welcomed by boroughs. It is important that these units cannot be considered a self-contained and that facilities and services provided in the development are genuinely shared between residents. It is also important that relevant space standards for these types of units are met.

London Councils is supportive of the proposal that this type of development should deliver cash in lieu contribution towards conventional use class C3 affordable housing. London Councils believes that upfront cash in lieu payment should be required in the majority of cases and that in perpetuity annual payments should only be used where developers can prove this is the only viable method of payment.

User: London Borough of Tower Hamlets

We are supportive that the London Plan is addressing this new typology and that it is explicitly requiring that it meets an identified market need and that it also contributes towards the delivery of affordable housing. We have had applications which indicated that they consider themselves to deliver a form of affordable housing however it is clear from the proposed rent levels, which often includes a high service charge to cover additional social facilities, that this would not meet the requirements of our preferred product mix.

We note that the policy proposes that the contribution towards affordable housing should be via cash in lieu. It is our view that larger schemes, are just as able to provide London Affordable Rent products delivered by a registered provider, as a build to sell or rent scheme. We suggest removing this level of detail on how the affordable housing contribution should be delivered and allow local discretion, as long as it delivers the equivalent of 35% of units to be affordable.

The ability for boroughs to require schemes to deliver affordable housing on site is of particular importance for ensuring mixed and balanced communities. One of the local concerns regarding this form of development is that by creating a self-contained community with a wide range of facilities / amenities within the building, it limits social interaction between residents within an HMO and those within the wider area. We note the wording in 4.18.5 which seeks to encourage social interaction but we consider that the 4th bullet point should be strengthened so that it should be a default position that the public amenities should be open access and that this should be clearly demonstrated through their design.

We have concerns about the standards of developments which are being brought forward and whether they provide sufficient space for medium / long term living. Whilst we acknowledge this is a new typology and therefore there is a lack of evidence to justify specific space standards, we consider it extremely important that some amenity standards apply, including minimising north facing units (given it is highly likely they will all be single aspect), ensuring adequate daylight and sunlight etc. We anticipate that residents may live in these units for the medium / long term and they should not be considered in a similar manner to student housing where sub-standard accommodation is tolerated. In effect it also creates an incentive away from delivering high quality C3 units if they face any constraints on meeting design benchmarks, towards delivering an HMO scheme where the standards are lower. We would strongly encourage the GLA to develop more detailed standards guidance to avoid this.

User:	Royal Borough of Kingston

The policy provides a clear way of determining applications for large-scale purpose-built shared living developments and the guidance is welcomed. However, boroughs should be allowed to develop its own policies and this should be set out in the policy.

User:	London Borough of Waltham Forest

We welcome the introduction of such development providing affordable housing. However, we do not consider that the policy goes far enough and think such developments should be subject to minimum space standards as with other housing to avoid substandard living conditions.

User: London Borough of Hillingdon

Shared living schemes, which are excluded from the minimum floorspace standards for residential accommodation, should not be regarded as a sustainable solution to addressing housing need.

The suggested minimum tenancy length of only 3 months is considered inadequate, with the standard assured shorthold tenancy requirement set at a minimum of 6 months, which itself has been criticised as being too short to provide a stable living environment.

Whilst the difficulties providing affordable accommodation for individuals is acknowledged, there is concern that this type of housing, which does not meet current minimum standards, becomes normalised in the place of long-term sustainable solutions to housing shortages.

User:	London Borough of Hounslow

LB Hounslow strongly support the clarification provided by policies H13, 14, 15, 16, 17 and H18 on other tenure types. However, consideration should be given to ensuring that policy H13 is well regulated so as to ensure they do not provide exploitative and result in poor quality accommodation and its implications on community cohesion and place making.

LB Hounslow supports this policy see above

User: London Borough of Hackney

The London Plan should introduce minimum space standards for this type of accommodation from the outset. Many local authorities in London are receiving applications for ‘co-living’ or large scale shared housing and without minimum standards regarding bedroom size and the level of provision of shared amenity space there is potential for many inadequate schemes being constructed. Hackney’s new Local Plan will require large-scale shared housing to meet minimum bedroom sizes which are currently used to guide HMO developments.

Hackney supports requirement for affordable housing. Hackney supports requirements for better renting such as the choice of up to three years tenancy length to offer security of tenure. Hackney’s Better Renting campaign would be a useful resource: https://hackney.gov.uk/better-renting

Without improved tenancy lengths, space standards and affordability terms we would propose removing this section from the Plan. The policy should also require a percentage of genuinely affordable accommodation.

The Plan should promote well-managed, high quality shared living for singles / couples on low incomes, especially for younger people unable to afford market rents, including under35s affected by the requirements of the Local Housing Allowance Shared Accommodation Rate.

User: Westminster City Council

The objective of supporting new high quality forms of housing supply is supported. However, the lack of any reference to room sizes, and acknowledgement in paragraph 4.18.7 that proposals will not meet affordable housing space standards, could clearly undermine this aim and result in poor quality accommodation that does not make a positive contribution to local neighbourhoods.

In contrast to the absence of any policy requirement on room size, on other matters the policy is overly prescriptive. This is an area marked by rapid innovation, with products taking different forms and including different mixes of use; these are likely to vary widely across London and over time. As such, it is an area in which a single, prescriptive policy (particularly one of the level of detail of this one) is unlikely to be effective and may simply stifle innovation.

Requirements that such development must provide bedding and linen changing and/or room cleaning services (criterion A5g) are overly onerous, and neither a planning or strategic matter. Similarly, whilst the intentions of management plans and measures to enable social interaction set out in paragraphs 4.18.4 - 4.18.5 are supported there are different forms these might take. The planning system cannot be used to determine the job description of managers, nor require them to organise community events.

It is also not clear why it is only schemes of 50 units + that qualify as this type of accommodation (paragraph 4.18.3), as smaller purposed built shared living schemes (e.g. 40 units) are likely to be proposed in more central locations and will have similar impacts.

A better approach would be a considerably shortened policy setting out the issues boroughs might take into account, based on local circumstances. These factors will include ensuring exemplary design, robust arrangements for long-term management to protect local amenity, and ensuring they do not concentrate to local over-concentrations of similar uses (secured through use of legal agreements to restrict permitted development rights where appropriate).

User: London Borough of Southwark

Policy H18 is a significant departure to assessing large-scale purpose-build shared living from the approach set out in the New Southwark Plan. The council requires any such proposals to provide conventional on-site affordable homes and where this is not possible off-site or an in-lieu payment may be required. The council does not support the Mayor's proposal that the default position regarding affordable housing should be an in lieu payment. This notwithstanding, the council supports the Mayor's position that the affordable housing contributions cannot take the form of sub-market shared living units.

The council questions the basis of the mechanism proposed to derive the value of an affordable housing payment. It is important to ensure the mechanism would not incentivise developers to provide shared-living accommodation in place of conventional housing schemes due to lesser affordable housing requirements.

The council request the Mayor allows boroughs to require conventional on-site affordable housing or calculate the value of any in lieu payments following the same approach that would be followed for conventional housing schemes.
It is further proposed the Mayor does not provide for the 'fast-track' approach to viability for shared-living schemes in order to ensure there is no financial benefit to progressing shared living in favour of conventional housing.

The council encourages the Mayor to produce planning guidance regarding design and accessibility standards for this type of development. However, there are some potential issues with this type of development which the council considers the policy should address.

The council considers the policy could be strengthened by stating that applicants must demonstrate shared living units could not effectively be used as sub-standard self-contained flats. As such, in room facilities should be minimal and mostly pooled in communal areas.

The council also considers the policy could be strengthened through introducing a requirement to ensure noise insulation measures between rooms are enhanced for this type of development. Furthermore, it is recommended the policy includes minimum space standards for each private unit (including private storage).

User:	London Borough of Redbridge

This policy is supported and we welcome the acknowledgement that this type of accommodation is seen as providing an alternative to traditional flat shares. The Council strongly suggests clause A (4) on tenancies is amended to “no less than six months” to ensure that this form of accommodation is meeting its specific housing need and that it does not effectively become a hostel.

User:	London Borough of Harrow

The Council support this policy.

The Council would encourage the Mayor to produce guidance for this form of residential accommodation. This should provide guidance on minimum standards, a ratio to determine a satisfactory level of communal space, design, and ensuring that developments do not become insular and not stitching into the fabric of the local community.

User:	Royal Borough of Greenwich

Support the requirement for Sui Generis non-self contained market housing to provide affordable housing, however the level of requirement as it is not clear what a unit of shared living is. For example, a unit could be defined as a bedroom, or a unit could be defined as multiple bedrooms that share a communal kitchen. This needs to be clarified to ensure that this type of development is making a proportionate contribution to affordable housing.

User:	Royal Borough of Greenwich

What constitutes an ‘identified market need’ requires further clarification. It should be clear that proposals for this type of use should not displace the delivery of self-contained homes, and that investment interest does not constitute an identified market need.

User: London First

We welcome the addition of this new policy on shared living in recognising this as a form of housing that can contribute to meeting London's housing needs. However, there are a few elements that require additional clarity as follows.

The requirement for shared living proposals to 'meet an identified need' is ambiguous. Specific requirements as to what must be fulfilled to pass these requirements would help to increase the efficiency of this part of the process to allow us to start building shared-living homes for Londoners. Furthermore, the start of H18A should be amended as follows:

Large-scale purpose-built shared living Sui Generis use developments, where of good quality and design does have a role in meeting housing need in London if, at the neighbourhood level, the development contributes to a mixed and inclusive neighbourhood, and it meets all the following criteria:

We welcome the clarity on affordable housing requirements for shared-living accommodation, and welcome the opportunity for financial contributions towards the provision of affordable housing in the borough. However, policy H18A8 could include the flexibility to provide a discount market rent product on site that could help those who are unable to access social housing, but who also do not earn enough to access intermediate housing options. The policy should also allow for cash in lieu payments to be phased rather than given as a lump sum upfront, where there is agreement between the local authority and applicant. This should also be reflected in paragraph 4.18.8 of the supporting text.

Paragraph 4.18.9 takes into account the rental cost as a per square meter comparison with other local C3 products to use as a basis for viability. By the nature of shared-living homes being non-self-contained this comparison must be done on a gross internal area to gross internal area calculation, not merely on the direct 'net rented area' of a room versus the net area of a C3 apartment, as this does not take into account the shared spaces which are the equivalency of the living room in standard C3 accommodation.

User:	London Borough of Bexley

Policy H18 Large-scale purpose-built shared living provides a clear definition of this type of housing, and sets out details including that, schemes should only be supported where they meet a local need, which the Council supports. Clarity on cash in lieu affordable housing payments and guidance on scheme management is provided, and this is welcomed, although there is no direct reference in the affordable housing Policy H5; it is only in a footnote to paragraph 4.5.6 where the link to Policy H18 is made. A direct reference in Policy H5 would be more appropriate. The new local SHMA will identify the local need for this Sui Generis market housing.

User:	London Healthier Places

The LHP Network recognises that large scale purpose built shared living may have a role in meeting housing need. However, we would like to emphasize that these developments must be of excellent quality and design and be well resourced, managed and maintained.

User: London NHS Clinical Commissioning Group

Policy H18 Large-scale purpose-built shared living

Paragraph 4.18.1 recognises that purpose-built shared living developments are a Sui Generis use. Local CIL charging schedules have not included this type of development, and it is important that the developments contribute to the provision of infrastructure, including health infrastructure which they will require. The provision of shared living developments should be kept under review

User: U+I

To maximise the range of living opportunities in London, the additional scope for an additional format of substantial complexes incorporating smaller sized individual living units, e.g., ‘town flats’, should be recognised within this policy; this would offer a further dwelling type with a meaningful provision of common services and infrastructure supporting individual units which are larger than hotel rooms but still smaller than national (and London Plan) minimum unit sizes.

In recognition of the reduced viability of such housing, any affordable housing component should be calculated at a lower rate, such as 20% discount on market rents for 20% of the residential units.

User:	Chartered Institute of Architectural Technologists

Policies H6, H7, H8, H9, H10, H11, H12, H13, H14, H15, H16, H17 & H18

We are in agreement with the proposals contained in the plan.

User: British Property Federation

We are pleased that the Plan recognises purpose-built professionally-managed shared living as a possible way to meet housing need in London and are also pleased that it encourages engagement between local authorities and private sector providers to deliver this form of living space. This concept opens opportunities for the housing sector, potentially allowing individuals to live in a desired location at an affordable price.

However, as with purpose-built student accommodation, affordable housing policy on such units needs to take account of their specific development economics, not some notional target, otherwise support is somewhat totemic.

A policy that stipulates "*Large-scale purpose-built shared living developments are expected to provide a contribution that is equivalent to 35% of the residential units to be provided at a discount of 50% of the market rent*" (198) is unrealistic and takes no account of the fact that space is being saved to deliver greater affordability.

Alternative forms of living can have a very positive impact on the housing market by providing "place over space" at a price which is lower than full size units in that location. There are large and growing parts of society that do not qualify for state social housing and cannot afford to buy, or even rent a standard sized home in central London. Therefore, an increasing number of Londoners are required to share accommodation in the private rented sector. This model offers a solution to this issue, and simultaneously seeks to improve the standard of shared accommodation in prime locations, which can often be of poor quality and badly managed.

Large-scale purpose-built shared living also offers a "socially active living" service. Research by the Mental Health Foundation found that 60% of 18 to 34-year-olds report regular feelings of loneliness in big cities[i]. Purpose-built shared living that incorporates communal space, encourages more social interaction between residents.

We understand the importance of space standards; however, these should also reflect innovation and the choices that Londoners want to make in putting place above space. This policy acknowledges ‘sui generis non-self-contained’ housing, however seems to avoid acknowledging self-contained sui generis housing. Research stipulates that from 2010 to 2015, the share of households in the UK that were renting increased by 21.6 percent - a substantially higher rate than second placed Ireland with growth of 12.3 percent and Germany - known for their rented culture - at 2.7 percent[ii]. The increasing demand for rented accommodation needs to be matched by supply to ensure that no more price inflation on the current private rented sector. There have been endeavours to satiate this increased demand; since 2014 there's been an increase of 172 per cent in ‘micro homes’ in the UK and last year a record 8,000 were built, with many of these schemes relatively ‘compact’.[iii] However, by failing to acknowledge self-contained sui generis housing, the London Plan is constraining the delivery of more homes via other more innovative housing options, at a time when London is undergoing a severe housing shortage.

Ultimately, we feel that the policies stipulated above may halt the development of a form of living accommodation that has many benefits in terms of helping to address London’s vast housing need and individuals’ choices. We urge the Mayor to reconsider the policies in H18.

[i] https://www.mentalhealth.org.uk/sites/default/files/the_lonely_society_report.pdf

[ii] Statista Limited Data, 26th February 2018

[iii] [iii] https://www.express.co.uk/life-style/property/844252/Housing-crisis-micro-homes-UK-house-building

User:	313-349 Ilderton Road LLP

Policy H18 Large-scale purpose-built shared living sets out that large-scale purpose-built shared living Sui Generis use developments, where of good quality and design, may have a role in meeting housing need in London if, at the neighbourhood level, the development contributes to a mixed and inclusive neighbourhood, and it meets all the criteria outlined.

The support for purpose build shared living accommodation is supported however the weight given to this type of housing should be carefully managed and that the policy should support a balanced supply between this type of accommodation and conventional C3 Use Class development.

User:	Silvertown Homes
This is welcomed.	

User:	University College London

Policy H18 Large-scale purpose-built shared living

UCL has a strong interest of the well-being of its alumni in London. UCL therefore supports the new housing models described in Policy H18. UCL anticipates that these models could be of interest to graduates of UCL and will help ensure London remains a viable home for this demographic. UCL supports policies and initiatives by the Mayor that will ease the path for graduates to remain in London at an affordable level. This is one of the ways in which London can retain its talent.

User: London Borough of Newham

Policy H18 Large-scale purpose-built shared living

LBN are supportive of purpose build shared living complexes, provided that these are delivered as part of a wider mix, in the right location and in response to need. In this regard draft policy H18 broadly aligns with LBN's existing and emerging policy. However, as LBN's stance remains that affordability within housing is not to be achieved at the expense of quality or through size minimisation, there is significant concern that these units are often far below minimum space standards, therefore do not represent a quality housing offer. In addition, whilst requiring affordable housing from this type of use is supported, the 35% threshold requirement is not (as per LBN's response to H6). LBN are also of the opinion that the type and level of contribution expected should be determined by the local authority, in accordance with viability, not set at the regional level.

User:	London Borough of Sutton

OBSERVATION. The London Borough of Sutton considers that Policy H18 should clarify the extent to which large-scale purpose built shared living can make towards borough housing targets.

User: Ms Deirdre Woods

H18 Large scale purpose built shared living

H18 A 5

The London Plan says:

1. **communal facilities and services are provided that are sufficient to meet the requirements of the intended number of residents and include at least:**

a) convenient access to a communal kitchen

b) outside communal amenity space (roof terrace and/or garden)

c) internal communal amenity space (dining rooms, lounges)

d) laundry and drying facilities

e) a concierge

f) community management

g) bedding and linen changing and/or room cleaning services.

Comments:

It is not easy to create a sense of community. It takes time and commitment which usually means paying someone to oversee this. And often community grant finding is given to short term outcomes.. Food production and growing is a good activity around which to base community engagement as the benefits of gardening and cooking together are well documented. Doing something that is activity making your neighbourhood a better place rather than something for bettering your own person situation only is not only good for everyone but for the person themselves. It will also help bring down the cost of living for the residents, lessen isolation, foster a sense of community as well into contribute to the lowering of air pollution created through food miles.

Amened Policy to read:

1. **communal facilities and services are provided that are sufficient to meet the requirements of the intended number of residents and include at least:**

a) convenient access to a communal kitchen

b) outside communal amenity space (roof terrace and/or garden)

c) internal communal amenity space (dining rooms, lounges)

d) laundry and drying facilities e) a concierge

f) community management

g) bedding and linen changing and/or room cleaning services.

h) food growing spaces and training for food production

User: Provewell Limited

This policy provides guidance on large-scale purpose-built shared living Sui Generis use developments and such developments are required to meet the following criteria:
1. it meets an identified need
2. it is located in an area well-connected to local services and employment by walking, cycling and public transport, and its design does not contribute to car dependency
3. it is under single management
4. its units are all for rent with minimum tenancy lengths of no less than three months
5. communal facilities and services are provided that are sufficient to meet the requirements of the intended number of residents and include at least:
a. convenient access to a communal kitchen
b. outside communal amenity space (roof terrace and/or garden)
c. internal communal amenity space (dining rooms, lounges)
d. laundry and drying facilities
e. a concierge
f. community management
g. bedding and linen changing and/or room cleaning services.

6. the private units provide adequate functional living space and layout, and are demonstrably not C3 Use Class accommodation
7. a management plan is provided with the application
8. it delivers a cash in lieu contribution towards conventional C3 affordable housing. Boroughs should seek this contribution for the provision of new C3 off-site affordable housing as either an:
a. upfront cash in lieu payment to the local authority, or
b. in perpetuity annual payment to the local authority

Provewell Ltd requests for clarification on this policy. It is considered that this policy should clearly specify what type of uses fall under ‘large-scale purpose built shared living’ i.e. student accommodation or co-living facilities which would include a concierge and room cleaning services.

Currently, the criteria outlined in this policy are considered restrictive to warehouse living use and not fundamental to their distinctive character. This includes the requirements to provide a concierge, bedding and linen change and/or room cleaning services, as well as to make financial contribution to affordable housing. These requirements in addition to being contradictory to the warehouse living character, would be likely to make warehouse living schemes unviable and would therefore prevent these type of developments from coming forward.

Furthermore, it should be reiterated that the required financial contribution to affordable housing does not apply to warehouse living as these units already provide affordable accommodation to occupants by offering both workspace and residential accommodation in one single space.

For the above reasons ‘warehouse living’ is not considered applicable to policy H18.Provewell Ltd therefore requests that either the policy clearly states that warehouse living is excluded or provides further details on what a ‘purpose-built shared living scheme’ entails/defined under.

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User:	London Borough of Ealing

The Council supports this new policy and, in particular, welcomes the fact that these developments will continue to be classified as ‘sui generis’ and the introduction of new design criteria when considering planning applications for such developments.

User:	King's College

In many ways large-scale purpose built shared living, Policy H18 might better meet the need for students provided any affordable housing could be provided as discounted rental units and not involve Cash in Lieu payments
for more usual tenure affordable housing.

It is also suggested that the cycle parking standards for student housing are excessive, particularly when the residences are located within walking distance of a campus or easily accessible to public transport. Evidence shows that PBSA and HEI provided student bed spaces and campuses generally operate successfully on much lower cycle provision.

User: The Collective Ltd

We support the inclusion of a specific policy relating to Large-scale purpose-built shared living or Co-living as we call it. The policy recognises that purpose built shared living is a way to meet housing need in London. The concept opens opportunities for the housing sector, potentially allowing individuals to live in a desired location at an affordable space.

Part 1 of the policy requires proposals to meet an identified need. This is reiterated in the sub-text at paragraph 4.18.2 where it states, Development proposals for such schemes should only be supported where they meet an identified market need. The product is about creating new homes for Londoners aimed at London's young workers who may not be able to afford conventional housing in the local area. There is a critical need across all of London for this type of accommodation.

Paragraph 47 of the National Planning Policy Framework states that housing policies should be based on full objectively assessed needs for market and affordable housing in the market area. The draft policy is based on an up to date assessment of housing need (The Mayor's 2017 London Strategic Housing Market Assessment) which identifies significant growth (circa 300,000 homes) in single occupancy households across the stated plan period 2017-2041. The reference to 'identified market need' in the draft policy is therefore unnecessary and we propose this is removed from the draft policy. If it is not removed then we propose that further clarity and guidance is provided on how this point can be addressed because as drafted it is open to interpretation.

Part 8 of the draft policy relates to affordable housing contributions. The draft policy states, it delivers a cash in lieu contribution towards conventional C3 affordable housing. Boroughs should seek this contribution for the provision of new C3 off-site affordable housing as either an:
a) upfront cash in lieu payment to the local authority, or
b) in perpetuity annual payment to the local authority
In both cases developments are expected to provide a contribution that is equivalent to 35 per cent of the residential units to be provided at a discount of 50 per cent of the market rent. If a lower contribution is proposed the scheme will be subject to the Viability Tested Route set out in part E of Policy H6 Threshold approach to applications.

Whilst we accept that affordable housing contributions are required as part of shared living schemes, it is a market product that relies on no public subsidy and typically provides accommodation at rental levels that can be afforded by those who would otherwise qualify for traditional affordable housing provided by boroughs or Registered Providers.

Given that shared living is a housing product (notably contributing towards housing delivery targets) and does not fall within the current definition of traditional affordable housing, we have been following the Housing SPG, 2016 approach to test what the maximum reasonable contribution this housing product can make towards subsidised affordable housing.
As a rental product, which the London Plan recognises has a distinct economic model, and given the rental levels the market derives it will not be able to deliver affordable rental levels for London's workers and also achieve the target market sale levels for traditional affordable housing targeted by the Mayor.

To ensure that shared living products maximise the contribution towards mixed and balanced communities and meet a range of housing needs, our suggested approach as schemes come forward is to undertake viability appraisals and focus any subsidy available in one or both of the following ways:

1. a financial payment to the Borough to bring forward traditional affordable housing to meet the specific local needs; or
2. a discounted market rent approach to a proportion of the co-living units. This would be expected to follow a similar approach to Section 4 Build to Rent, of the Affordable Housing SPG which currently relates to C3 housing and excludes non-self-contained accommodation. Such that subsidised rent levels are provided on a proportion of the units set at a level to address local needs. Where this has been explored to date co living has been able to provide for incomes of c £25,000 which would cater for those on low starting salaries in their first jobs.

on site, unless off site provision or a financial contribution of broadly equivalent value can be robustly justified and the agreed approach contributes to the objective of creating mixed and balanced communities.

We feel that the restrictive approach of Part 8 means an opportunity would be lost to help large numbers of Londoners who currently live in similar single occupancy accommodation such as nurses and other key workers (usually without access to amenities offered in shared living, or access to similar community benefits).

We note that paragraph 4.18.7 states that

because [this form of housing] does not meet minimum housing space standards and generally consists of bedrooms rather than housing units, it is not considered suitable as a form of affordable housing itself.

A discount market rent option helping those who are unable to access social housing, but also do not earn enough to access intermediate housing options has the chance to help encourage a mixed community in Large Scale Shared Living buildings as well as enhance the quality of life of the junior doctors, nurses, teachers, police and other key workers that are so important to keeping London running.

It is proposed that policy flexibility is provided for either of these approaches to be considered on a site by site basis, so that authorities can consider how to maximise the affordable housing outcomes from co-living schemes and opportunities to deliver mixed and balanced communities.

In response to the proposed reqirement to provide a contribution that is equivalent to 35 per cent of the residential units to be provided at a discount of 50 per cent of the market rent to be elgible for the “Fast Track” viability route we have reviewed the London Plan Viability Study

(December 2017) and there are a number of areas where we would question the assumptions that have been made. As one of the leading co-living developers we would welcome the opportunity to review the evidence base with the London Plan team and provide our comments as currently drafted the approach is likely to be prohibitive to the delivery of co-living schemes. Given the growing concerns about meeting overall housing need across London there is a desirability not to restrict new products which could take up some of the slack from entering the market.

• incidental meeting spaces should be provided in public and semi-public spaces and shared spaces within the building
• amenity spaces should be of a size and quality that actively encourages their use and community engagement. These should vary in size throughout the building to allow both smaller and larger groups to gather comfortably.

In response to draft paragraph 4.18.9 which states,

The rental cost of this form of accommodation is not directly comparable to the rental costs of conventional Use Class C3 housing as units are significantly smaller than the minimum housing space standard i.e. a one person dwelling of 37 sqm. If a comparison is undertaken it should be on a square metre rental rate of the private accommodation and not a unit rental rate.

we would like to make clear that the policy should acknowledge that the rents charged include additional services such as: cleaning; linen changing; utility bills; Wifi etc so the absolute rents per unit need to be considered rather than rents per square metre. Also any rent comparison must take account of the shared spaces within the building and not just a tenant's private space.

In response to paragraph 4.18.3 which states,

To ensure this form of accommodation is meeting its specific housing need, it is important that it does not effectively become a hostel, so tenancies should be for a minimum of three months.

Whilst we acknowledge the importance of preventing the use becoming a hostel, we do not consider it acceptable to impose a restriction on tenancies of less than 3 months. We propose that flexibility is applied to enable tenancies of less than 3 months to cover void periods. Traditional C3 residential units and HMOs have the ability to let rooms for up to 90 days of short lets per year so we consider a similar approach can be applied to shared living.

User: James R Brown & Company Ltd

Proposed Draft London Plan Policies H6, H13,
H15, H17 & H18.
Financial Viability Orientated Representations.
1/3/2018
Proposed London Plan Policies H6, H13, H15, H17 and H18 are not justified by robust viability evidence because the evidence in the London Plan Viability Study ('LPVS') is fundamentally flawed and/or wrong.
We assume that there is an onus on the GLA to provide appropriate evidence to justify the proposed London Plan policies and that, where this evidence is missing or lacking, the consequence will be (or should be) that the proposed policy cannot be adopted.
The London Plan Viability Study ('LPVS') is fundamentally flawed and/or wrong because:-
(N.B. We refer to the main body of the LPVS as the LPVS and its accompanying Technical Report as the LPVSTR below).
a) Support or Inform:-
Para 1 of the LPVS Executive Summary says its purpose is to 'support' the new London Plan. However, this implies a fait accompli as surely the main purpose of the LPVS should have been to 'inform' the potential policies in the new London Plan.
As the LPVS is dated December 2017, it would not seem credible that the proposed new London Plan policies were generated almost immediately thereafter. Para 1.2.4 of the LPVS suggests that consultation on the proposed London Plan started at the end of November which pre-dates or almost coincides with the LPVS.
The LPVS appears to have been written to support pre-determined policies in the new London Plan rather than inform policy making which is in-appropriate and undermines its credibility as 'evidence'.
b) Intervention & Justification for 35%:-
Whilst planning policy has been intervening in the affordability and consequential value of housing for some years now, is this fundamentally legal and/or a planning policy matter? What part of what law permits and/or promotes this?

Policy HC1 Heritage conservation and growth

User:	Jaspar Group

Consider adding the word “substantial” before harm under point C. I have heard a number of conservation officers state that any development or change to heritage asset or building causes some level of harm. I do not agree with this however this is often the blanket view of many officers in LPAs.

User: Mr Peter Eversden MBE

Policy HC1 is supported but paragraphs following it need to be improved.

Paragraph 7.1.4 should have the words 'boroughs' character appraisals, conservation plans and local lists' changed to 'boroughs' character and context analyses, conservation area appraisals and related management plans, local heritage lists and Assets of Community Value'

The words 'and decisions.' should be added at the end of the paragraph.

User:	Mr Peter Eversden MBE
Paragraph 7.1.5 should have the words ‘understanding of the heritage values of a site or area’ changed to ‘understanding of the heritage values of a listed building or site or area’	

User:	Mr Peter Eversden MBE
Paragraph 7.1.5 should have the words ‘understanding of the heritage values of a site or area’ changed to ‘understanding of the heritage values of a listed building or site or area’	

User:	Mr Peter Eversden MBE

Consideration should be given to including in Figure 7.5 the Turnham Green Battlefield of a conflict in the Civil War - see http://www.battlefieldstrust.com/resource-centre/civil-war/battleview.asp?BattleFieldId=83

User:	MS J GELLER

Developments **MUST** avoid harm to significant archaeological assets. Our heritage should be preserved at all costs.

User: Miss. Emma Smith

I think it is important that heritage assets are protected and conservation areas respected. I am not convinced this always occurs. There was a recent case in Islington (Regents Wharf) which although rejected by the committee, had progressed a long way without consultation with Historic England even though the site was 'large' and half of it was in a conservation area. When consulted, Historic England had numerous, forceful objections to the plans. But they should have been consulted far earlier in the process. Perhaps this was a one-off error but there should be a process for dealing with sites that have heritage assets which is recognised across all boroughs

User: Mrs Susan Deans

Although the policies are praiseworthy and similar to the policies in the existing London Plan, the existing policies are not applied in Ealing where there are many examples of developments that conflict with the Plan’s heritage policies. The policy therefore needs to be much more tightly drawn to prevent this.

I also strongly support the policy to support London's existing cultural venues and to devlop new oulets in town centres and places like Ealing with good public transport. However, my concern is that as with similar policies in previous plans, the drive to provide additional housing on every available site will mean that no effort will be made to implement the cutural policies whch should in my view be given greater priority.

User: Elizabeth Wardle

Thank you for your email of 20 December, but it doesn't actually address the concerns in my original message; I was writing about the Mayor of London's proposal in his draft London plan to relax planning regulations, in particular those protecting local character.

I live in New Barnet, a Victorian suburb which has already lost a good deal of its pleasant character - predominantly family housing, with gardens and mature trees - and residents are anxious that what remains should be preserved. Many attractive family houses have been demolished and replaced with blocks of flats quite out of keeping with their surroundings; now many office blocks are also being converted into flats, so the population of the area has increased enormously in recent years and it is becoming dangerously overcrowded. Roads are congested, buses and commuter trains are packed, schools are oversubscribed and health services cannot cope with demand. Developers make huge profits but do not contribute to local infrastructure.

As someone who suffers from asthma, I also notice that air pollution is becoming worse. Intensive development often entails the loss of green space and mature trees, and this has a detrimental effect on the environment, causing loss of habitat for wildlife and biodiversity as well as damaging human health.

I understand the need for more housing, but planning regulations are necessary to protect an area from overdevelopment; in any case most of the flats being built are unaffordable for the people most in need.
It seems counterproductive to allow the character of an area to be destroyed, making it less desirable as a place for people to live. Much more could be done to ensure that empty flats and houses are brought back into use and to encourage the conversion of existing older homes into smaller units.

I would very much appreciate the Mayor's own comments.

User: Ms Hilary Norris

HC1 B3 '*Contribute to significance and sense of place'.* Without overwhelming it, as in the case of P2016/4805/FUL (Plan submitted to Islington Council).

HC1 B4 '*Positve benefit/social well being'.* The following must be taken into consideration:

a) the proximity to existing residential properties

b) height and mass affecting existing residential properties

c) light exclusion to existing residential properties

HC1 C *'Seek to avoid harm early on in design process'.* This needs to be mandatory.

User: Dr Robert Gurd

This policy contains thoroughly laudable objectives but given the current severe resource constraints upon boroughs, particularly in relation to conservation expertise (the Borough of Ealing only employs the services of a conservation officer for two days a week) we consider the objectives to be totally unachievable in practice. Only after concerted and lengthy pressure upon the Council has a long-delayed review of conservation areas in the Borough of Ealing now finally started and it has been necessary for them to employ external expertise to carry out the review. Without the exercise being properly resourced, boroughs will be tempted to let applicants carry out such reviews themselves which by definition will be biased in favour of their position. If the policy is to be retained in its current form, boroughs should be offered additional expertise or resource to assist in carrying out the required assessments. If this is not possible, the policy needs to be reworded to ensure that expectations of what boroughs can deliver are properly managed.

User: Montagu Evans

Policy HC1 – Heritage Assets

Part C of draft **Policy HC1** (*Heritage conservation and growth*; page 268) says that:

"Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed. Development proposals should seek to avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process."

There are a number of issues with this proposed policy. First of all it is a 'one size fits all' test and does not distinguish between designated heritage assets (such as statutorily-listed buildings and conservation areas) and non-designated heritage assets (such as locally-listed buildings or buildings of townscape merit) despite there being separate and distinct tests in the 2012 NPPF for these two categories of assets.

Second, it requires the avoidance of harm whereas national policy recognises that harm can be acceptable in the wider balance; this is unduly restrictive and not consistent with national policy.

Third, it gives no indication of how different degrees of harm should be weighed in the overall balance, nor does it recognise the need for special regard to be paid to the effect of development on listed buildings in accordance with the Planning (Listed Buildings and Conservation Areas) Act 1990.

This policy should be drafted so that it reflects, and can be operated in accordance with, national policy and the aforementioned statutory instrument.

User: London Forum of Amenity and Civic Societies

Although London Forum **supports** a lot that is in this chapter, more is required:

- **the development of a separate heritage strategy for London**
- **the development of height of buildings strategy along the Thames**
- **a review of the strategic views framework**
- **a review of strategic views to prepare additional views/panoramas, especially along and across the Thames**
- **better management of the night time economy, including accreditation through ATCM's Purple Flag scheme.**

Policy HC1 Heritage conservation and growth

As with several other chapters in the draft New London Plan, the heritage policies should have a lead-in set of paragraphs based on guidelines by the Mayor. In July 2017 Built environment conservation adviser Historic England urged the Greater London Authority to develop a new London Heritage Strategy, which would encourage heritage-led regeneration and character-led new development. Historic England said that the strategy should "inform the development and implementation of policies in the new London Plan and other mayoral strategies". The watchdog's report argues that such a strategy should "inform a range of strategic issues that will support the delivery of good growth, from policy to implementation." The report '*Translating Good Growth for London's Historic Environment'* is at http://bit.ly/2FpzOsW

There should be a London Heritage Strategy

Policy HC1 should open with a statement that new development should start from the premise that it should enhance the area in which it is to be built, having special regard for World heritage Sites, Listed and Locally Listed buildings, designated heritage assets and character areas. Particular care is needed to assess carefully any new buildings which break into existing skylines.

Policy HC1 B (3) should have the words 'with responses that may be' before the word "innovative**"**

Policy HC1 B 4) is worded in a weak manner and does not reflect the content of the statutory requirements set out in the relevant sections of the Planning (Listed Buildings and Conservation) Act 1990 [e.g. S.16.(2)] covering listed buildings, or S.72 (1) relating to conservation areas), which require that **'special regard be had to the desirability of *preserving* the building or its setting or any features of special architectural or historic interest that it possesses...' in the first instance, and that 'special attention *shall* be paid to the desirability of *preserving* or enhancing the character or appearance'.. in the latter case.** Given the superior status of provisions in an Act of Parliament by comparison with the NPPF Section 12 which uses the words “conserving and enhancing”, the New London Plan should be strengthened by adding this Act’s requirements.

For these reasons, **Policy HC1 A** should have its second word “should” changed to ‘shall’.

In **Policy HC1 A** or in a supporting paragraph there should be reference to the Planning (Listed Buildings and Conservation) Act 1990 [e.g. S.16.(2)] covering listed buildings and S.72 (1) relating to conservation areas.

Policy HC1 B 4) should have the words “sustain and enhance” changed to ‘preserve and enhance’. It should be noted that 'to preserve' was held by the Courts to mean 'to prevent from harm', but still encompasses beneficial change.

Policy HC1 C should have the word “should” in the second line changed to ‘must’ to meet the requirements of the Planning (Listed Buildings and Conservation) Act 1990. The word “conserve” in line two should be replaced by ‘preserve or enhance’.

Policy HC1 C should have at the end ‘Consideration should be given to the effect of new development on the skyline.’

Policy HC1 D should have added the words ‘Where appropriate archaeological sites should be preserved in situ and be publicly accessible.’

Policy HC1 E - replace the word “should” by ‘are required to’ Also insert ‘, in the light of development proposals in particular,’ after “. . heritage assets”

User: Central Acton Neighbourhood Forum

As stated, the policies are laudable. They reflect the guidance provided in eg the NPPF and as such are not dissimilar to the policies in the existing London Plan. Our concern is in the way the policy is applied in Ealing - or not applied. There are too many examples of developments that manifestly conflict with the Plan's heritage policies which the Mayor disregards when he is consulted about proposals. The policy therefore needs to be much more tightly drawn to prevent this, and when commenting on Borough proposals either in their local plans or on major developments referred to him, the Mayor should insist that HC1 policies are implemented as completely as the Plan's housing policies.

User:	The Federation of City Farms and Community Gardens
Pleased to see the emphasis on outdoor heritage in the phrase landscapes.	

User: Alan Simpson

The draft Plan gives insufficient consideration to the protection and enhancement of London's diverse local character. Policies D1 and and HC1 need to be amended to ensure that greater attention is given to the character map of London, and community or neighbourhood plans, in planning and designing new development. **Proposed changes:** The first sentence of Policy D1 'London's form and characteristics' should be amended to make specific reference to neighbourhood and community plans so that it reads **'Development Plans, area-based strategies, neighbourhood and community plans. and development proposals should address the following:'** The phrase **'reflect and enhance local character and distinctiveness'** should be added to the list after 1) in Policy D1A.
The first sentence of Policy HC1 'Heritage conservation and growth' should be revised so that it reads: '**Boroughs should, in consultation with Historic England, other relevant statutory organisations and local community and neighbourhood planning groups, develop evidence that demonstrates a clear understanding of London's historic environment, local character and distinctiveness.**'

User:	Watford Borough Council

Suggested change: The maps could usefully identify heritage assets in areas outside but near to the GLA to provide more context. This would help to highlight the need to consider cross boundary issues such as networks of heritage assets and waterways.

User:	Adrian Cowie

The first sentence of Policy HC1 ‘Heritage conservation and growth’ should be revised so that it reads: ‘**Boroughs should, in consultation with Historic England, other relevant statutory organisations and local community and neighbourhood planning groups, develop evidence that demonstrates a clear understanding of London’s historic environment, local character and distinctiveness.**’

User: Paul Stansfield

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User: Royal Botanic Gardens, Kew

HC1A

We agree that Boroughs should, in consultation with Historic England and other relevant statutory organisations, develop evidence that demonstrates a clear understanding of London's historic environment. Furthermore, Boroughs should consult neighbouring Boroughs and consider the historic environment and heritage assets in close proximity to the Borough boundary when developing their understanding of the historic environment and making plans for enhancements.

HC1B

We agree that Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. Boroughs should also consult neighbouring Boroughs and consider the historic environment and heritage assets in close proximity to the Borough boundary when demonstrating their understanding of the historic environment and heritage vales of sites or areas.

HC1C

We agree that development proposals affecting heritage assets should conserve their significance, and recommend adding that boroughs should also consult neighbouring Boroughs and consider the historic environment and heritage assets in close proximity to the Borough boundary when considering development proposals.

User: The Royal Parks

HC1 Heritage conservation and growth

Inappropriate development can significantly dilute the look and feel of heritage assets and undermine their value to the public. Any policy which effectively addresses this is supported by TRP.

HC2 World Heritage Sites

TRP supports this proposal. It is pleased that the Plan advocates that development proposals in buffer zones to WHS should conserve, promote and enhance the value of the site.

HC3 Strategic and local views, HC4 London View Management Framework

TRP strongly supports the protection and enhancement of existing strategic views (some of which have been undermined in recent years by inappropriate developments), and the creation of new protected views.

User: London Borough of Hammersmith and Fulham

Policy HC1 Heritage conservation and growth

Under C – the phrase ‘should conserve their significance, by being sympathetic to the assets’ significance’ is not compatible with the NPPF or current legislation. In the language of the NPPF a heritage asset can only be conserved if it is protected from harm. The term ‘sympathetic’ is poorly chosen and ‘by being sympathetic to the assets’ significance’ should be removed since it is unnecessary.

Under C – the phrase ‘and appreciation within their surroundings’ is poorly chosen and should be replaced by ‘including their setting’. The setting of a heritage asset may not simply relate to its immediate surroundings but also a wider setting including longer views. In addition, in the case of a listed building or conservation area the significance of a heritage asset can be appreciated from inside it as well as from its surroundings.

User: Ms Valerie Munday

The Enfield Archaeological Society welcomes the fact that boroughs should demonstate a clear understanding of London's Historic Environment but this should cover not only in situ assets of archaeological significance, historic buildings etc but also the objects that might be excavated from these archaeolgical sites and come from these historic buildings. No mention is made in the document of the objects that museums preserve for posterity that can make history and archaeology accessible particularly to children and young people but all ages and abilites and those with visual impairment through handling original objects that the museum keeps. Although Arts Council Museum Accreditation is designed to prevent boroughs from abusing their museums and collections this has not prevented some boroughs in London no longer maintaining a museum and these 'valuable' assets that have been given to the borough being disposed of.

User: mr Alan Leibowitz

The policy should make it very clear that the impact of development on the setting of "heritage assets" must be considered both locally and far afield. This particularly realtes to tall buildings which may not have a negative impact on the immediate environment, but when seen from afar may be devastating.

User: King and Company Ltd

The drivers for good growth place challenges on developers and planning authorities to increase the density of development close to public transport hubs.

Those locations are typically very well established parts of the urban grain and can include buildings and areas of some historic interest. It would be possible to interpret HC1 in such a way that it impeded the opportunity for good growth and density close to areas of historic interest.

The key is to look at each case and to assess the significance of heritage assets, and then to determine the extent to which a development proposal would genuinely harm that significance. That would result in a particular judgment, and that should be weighed in the balance with competing planning objectives.

There are numerous examples of landmark buildings which have been tested against a framework of buildings which have susbtantial significance as well as those with lesser heritage significance. In these instances there is a more substantial design challenge to result in a scheme that provides a net positive contribution in wider planning terms.

We are concerned that policy HC1 does not set these matters out in that broader context.

User: Mrs Ann Chapman

This policy contains thoroughly laudable objectives but given the current severe resource constraints upon boroughs, particularly in relation to conservation expertise (the Borough of Ealing only employs the services of a conservation officer for two days a week) we consider the objectives to be totally unachievable in practice. Only after concerted and lengthy pressure upon the Council has a long-delayed review of conservation areas in the Borough of Ealing now finally started and it has been necessary for them to employ external expertise to carry out the review. Without the exercise being properly resourced, boroughs will be tempted to let applicants carry out such reviews themselves which by definition will be biased in favour of their position. If the policy is to be retained in its current form, boroughs should be offered additional expertise or resource to assist in carrying out the required assessments. If this is not possible, the policy needs to be reworded to ensure that expectations of what boroughs can deliver are properly managed.

User:	SAVE Britain's Heritage

In policy HC1 we would like to see a strengthened emphasis on heritage and the role it plays in London. The intrinsic value of historic buildings should be underlined more explicitly in the London Plan. London’s built heritage is one of its biggest assets in economic, social and environmental terms. Historic buildings generate income and contribute to the local economy, improve people’s well-being and represent an invaluable resource in terms of embodied energy and materials. Policy HC1 should also make a strong statement about the important role that locally listed buildings play to character and neighbourhoods and that they should be protected by the London Boroughs.

User:	Putney Society

7.1.1 London’s historic environment, represented in its built form, landscape heritage and archaeology, provides a depth of character that benefits the city’s economy, culture and quality of life. The built environment, combined with its historic landscapes, provides a unique sense of place, whilst layers of architectural history provide an environment that is of local, national and international value. London’s heritage assets and historic environment are irreplaceable and an essential part of what makes London a vibrant and successful city, and their effective management is a fundamental component of achieving good growth.

This is a very welcome recognition of the role of heritage in London’s reputation and in the Plan’s concept of good growth.

User:	Putney Society
7.1.2 has a welcome reference to undesignated assets archaeological as well as buildings of local interest. This seems to be the only reference to Local Lists kept by some Boroughs which should be more strongly encouraged.	

User:	Putney Society
7.1.5 stresses the importance of engagement but puts the onus on developers not the Councils. This should include a reference to public consultation which is conducted impartially.	

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User:	Putney Society
7.1.6 says ‘Today urban renewal in London offers opportunities for the creative re-use of heritage assets and the historic environment as well as the enhancement, repair and beneficial re-use of heritage assets that are on the At Risk Register’. We strongly support this recognition of the creative re-use of heritage, one of our greatest national assets, and of the need for beneficial use to fund maintenance, not just of assets ‘at risk’.	

User:	Putney Society
7.1.7 We endorse the definition of significance and importance of setting as well as the asset itself but should add that the condition of the asset is not relevant to its significance.	

User:	Putney Society
7.1.8 We strongly agree that deliberate neglect/damage should be disregarded in decision making.	

User:	Putney Society
7.11 ‘Developments will be expected to avoid or minimise harm to significant archaeological assets’. Insert ‘whether designated or not’.	

User: Telegraph Hill Society

Policy HC1 comment and support for HC1C

We wholly support the need to avoid harm to heritage assets which we note, from para 7.1.2 includes Conservation Areas. We believe however that there is a contradiction here with other policies which requires resolving with HC1C being paramount.

We include elsewhere in this document our concern for the future of our Conservation Areas, particularly as regards their omission from policy H2F (see above).

Policy HC1 Objection

Although the detail in sections A through E of policy HC1 seek to mitigate the impact of development proposals on Conservation Areas and other heritage assets, the policy includes nothing about protecting additional areas identified as worthy of protection. We believe such a policy should be explicit.

As areas change, remaining assets which were once commonplace become rarer and worthy of consideration for protection. In addition, some new buildings are so archetypical or unusual on construction that they too might be worthy of protection. The current draft in HC1A refers to identifying (new) heritage assets but not to taking action to protect them once identified.

User:	Camden Conservatives

HERITAGE CONSERVATION AND GROWTH: POLICY HC1

34. The Draft London Plan recognises the risk of cumulative harm to a heritage asset (such as a Conservation Area), resulting from individual planning applications (each
of which is judged to result in no harm, or to result in less than substantial harm which is outweighed by the public benefits of the proposals). However, it simply states that this risk should be “actively managed”. This is a meaningless phrase. Policy HC1 should be amended to state as follows:

“The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed, and taken into full account when harm to heritage assets is being assessed”

User:	The Pinner Association

Support [C] – "*Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed. Development proposals should seek to avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.*" – except that "enhancing" heritage assets can cause harm and decrease the heritage significance of the site.

User: Royal Borough of Kensington and Chelsea

7.1 Policy HC1 Heritage conservation and growth

We welcome the creation of a separate chapter for Heritage and Culture as these are important ingredients of what makes London a successful city, and the Royal Borough has a particular wealth of heritage assets and cultural facilities. 21

We recommend reconsidering the title for HC1- *Managing Heritage Assets*?

Part A) It is not clear what evidence needs to be developed by LPAs and there should clarity on this in the supporting text. For example – Conservation Area Appraisals and Management Plans. This could be an onerous task for LPAs where heritage expertise can be an increasingly diminished resource.

Part B) highlights the regenerative role of heritage assets. This is a new policy combining London Plan (2016) Policies 7.8-7.9. LPAs will need to work collaboratively with Historic England and statutory organisations achieve parts 1-4. The positive role that the historic environment can have in providing a readymade identity is welcomed as is the positive role heritage has in regeneration and place making. The removal of the wording "positive role" which is within the adopted London Plan Part A is unfortunate.

Part C) "actively managed" is unclear wording. The term "avoid harm" is the consistent wording through the Draft London Plan for development and heritage assets. This approach seems to accept that some harm will be acceptable and is more permissive which could be in conflict with other legislation and guidance. The starting point for development proposals should be not to have an adverse impact on heritage assets and where this does occur the harm will need to be mitigated. The omission from the policy of the considerations in the adopted London Plan 2016 7.8 D "form, scale, materials and architectural detail" is of concern although it has now been moved to supporting text to the policy at paragraph 7.1.7.

Part D) the same comments apply as regards "avoid harm" to archaeology.

The omission from policy in the adopted London Plan is of concern although this has now moved to supporting text paragraph 7.1.11. However, this means it has been reduced in the weight it carries.

It is suggested that as the setting of heritage assets has become such an important issue in the determination of planning applications and appeals that there should be a separate sub section on this policy.

The policy should cross reference to the relevant sections of the Design Chapter D1 and D2.

Figures 7.1-7.5 Are these illustrative maps useful? They do provide an indication of the concentration of assets and waterways, but only an indication.

User:	National Trust London

The National Trust's London team strongly support your ambitions for heritage and culture as outlined in the Draft London Plan. In particular, we fully endorse **Policy HC1 Heritage conservation and growth** and its articulation of the value that the historic environment brings to the *'economy, culture and quality of life'* within the city (7.1.1).

User:	National Trust London

Given our work in London in the field of heritage engagement we also welcome the assertion that *‘every opportunity to bring the story of London to people and improve the accessibility and maintenance of London’s heritage should be exploited’* (7.1.3).

User: Stroud Green Conservation Area Advisory Committee

"Clarify Conservation Areas are Designated Heritage Assets

2.1 Whilst the Glossary is clear, the supporting text in the following clauses in Chapter7,

- Policy HC1 Heritage conservation and growth A;
- Policy HC1 Heritage conservation and growth B 3)
- Policy HC1 Heritage conservation and growth C

should be changed to make it clear that heritage assets include Conservations Areas. As they are, these clauses suggest it is only buildings which are heritage assets."

User: London Borough of Islington

Chapter

Heritage and Culture

Draft London Plan Policy

Policy HC1 – Heritage Conservation and Growth

Islington Response

We support the efforts to protect the historic environment of London presented in its built form, landscape, heritage and archaeology.

Islington considers it is not clear whether the policy HC1 (A) is suggesting a new approach to evidencing and understanding the protection of the historical environment or whether this is use of existing evidence of heritage assets – lists of these assets and their condition and risks to, conservation area character appraisals.

Paragraph 7.1.3 references a 'blend of old and new that gives capital its unique character'. This is a simplification of the capitals character and could either be revised and/or cross reference to new policy D2: Delivering Good Design part A initial evaluation which sets out a list of elements that could all be considered contributing to character.

Part HC1D and paragraph 7.1.9 reference an expectation to develop up-to-date Archaeological Priority Areas for plan-making and decision-taking. Islington’s Archaeological Areas are currently being revised by Historic England and we will update our records when the new data are available.

User: CAMRA (Campaign For Real Ale)

1. We strongly support the inclusion of a standalone policy on protecting public houses, under the heritage and culture heading. The following article in the February/March issue of our regional magazine, London Drinker summarises our response.

Policy HC7 of the new draft London Plan, published by Mayor Sadiq Khan in early December, makes welcome and timely recommendations to boroughs on protecting existing public houses and supporting proposals for new ones from the perspective of the heritage, cultural, economic or social value of each individual pub.

Applications that propose the loss of valued pubs should be refused unless there is authoritative marketing evidence demonstrating no realistic prospect of pub use in the foreseeable future. The business should have been offered for sale locally and London-wide in appropriate publications and through relevant specialised agents for at least 24 months as a pub at an agreed price following an independent valuation and in a condition, that allows the property to continue functioning as a pub.

The impact of ‘trojan horse’ conversions is clearly addressed. Proposals for redevelopment of associated accommodation, facilities or development within the curtilage of a pub that would compromise its viability should be resisted and boroughs are encouraged to apply the Agent of change principle (Policy D12) in safeguarding established venues that generate noise, e.g. live music, by ensuring that developers bear the cost of adequate soundproofing for incoming residents.

1. Two other themes could helpfully be spelt out in support of Policy HC7 A 1)

- The need for boroughs to adopt pub protection policies as part of their strategic plans – those who have not done so should follow the examples of those that have – and enforce them;
- The negative impact of Late Night Levies in penalising community pubs that might otherwise host the occasional small-scale late live music session or New Year’s Eve celebration, while the supermarkets should arguably be [RS1] paying for any extra policing the young consumers of their enticingly cheap spirits might warrant.

User: Galliard Homes

Galliard highly recommends that Policy HC1 – Heritage conservation and growth, Part C is reworded. The text suggests that `development proposals should seek to avoid harm' where considering the effects of development on heritage assets. However, there is a sophisticated body of case law that makes `seeks to avoid harm' a very dangerous threshold for every scheme that contains, is part of or is near a heritage asset. This wording sets a very high test when making a judgement of harm and fails to consider the balance of harm against public benefits outlined in paragraphs 133 and 134 of the NPPF, along with `a balanced judgement' will (para. 135) when having regard to the scale of harm or loss and the significance of the heritage asset. This balance needs to be identified in the policy.

Section 72 of the Planning (Listed Building and Conservations) Act 1990 imposes a duty to `pay attention to the desirability of preserving or enhancing the area's character or appearance', as it relates to Conservation Areas. A similarly worded duty under Section 66 of the same Act requires special regard to be had `to the desirability of preserving a listed building or its setting'. Successive court judgements to the circumstances have confirmed that `considerable importance and weight' must be given to the desirability of preservation or enhancement in any balancing of the merits of a particular proposal.

User: Brentford Community Council

We welcome the plan’s policy for an evidence-based understanding of London’s heritage assets. However, we consider that new development should start from a respect for our heritage.

This will include the immediate settings of listed and locally listed buildings and include the more distant effect new development may have on views out of Word Hertiage sites, Protected Landscapes, Conservation Areas and Character Areas. Particular care is needed to avoid any new buildings which break into existing skylines.

We request the Mayor to begint Policy HC1 with a statement that new development must start from the premise that it should enhance the area in which is to be built, having special regard to World Heritage Sites, Listed and Locally Listed buildings, Conservation Areas and Character Areas.

Para 7.2.4. should require Councils to include policies in their Local Plan policies to ensure that applications which adversely impact World Heritage Sites are refused . The Mayor should underwrite this requirement by indicating in this plan that he will refuse such applications.
We would ask that the Civil War Battle of Brentford should be suitably recognised and protected.

User:	City of London Corporation

The City Corporation welcomes the explicit recognition of the links between heritage and economic growth and vitality, between heritage and social well being and the delivery of culture and the night-time economy. The Corporation also welcomes the requirement for boroughs to develop an evidence base on the historic environment in order to ensure that the historic environment informs development management and other individual proposals.

User:	City of London Corporation
Paragraph A, suggest rewording to emphasise seeking access to and interpretation of heritage assets: ‘…… improving access to and interpretation of heritage assets, landscapes and archaeology within their area.’	

User:	City of London Corporation
Explanatory text, paragraph 7.1.11 (last sentence) Add ‘publication’ after dissemination.	

User: Eastcote Conservation Panel

The Mayor does not appear to realize the difference between inner and outer London. A one size fits all plan cannot and will not work.

The area covered by LBH was once known as Middlesex, until we were forced into what is now known as Greater London. LBH is made up of ancient villages, most of which are mentioned in the Domesday Book and fine Metroland Towns. This means our communities have more than a thousand years of history and culture.

This should be respected.

The growth of any town or village should respect the heritage and culture of that community. The policy of cramming in unsuitable buildings, even it seems into designated Conservation Areas, cannot be classed as ***good growth.***

Protecting heritage and culture of any community is of vital importance.

Eastcote has 3 Conservation Areas, 1 Area of Special Local Character, 31 Grade 2 listed buildings and many Locally listed buildings and structures.

However, earlier polices of allowing infill building in Conservations Areas & ASLC must be deleted from the draft plan if these areas are going to keep their special character. The same applies to the Statuary Listed Buildings and Locally listed buildings, not all of these are in Conservation Areas, therefore there should be stronger protection to stop all being swallowed up by inappropriate developments as laid out in earlier chapters. Thus being in line with the NPPF.

User:	Katherine Bligh

I cannot support this Plan as it does not:- protect and enhance our conservation areas (I live in one myself). In fact it does the opposite. What is the point of having a conservation area if it is going to be destroyed by totally inappropriate buildings, often badly designed, often too tall and totally disrespectful of the local surroundings ?

User:	Elena Moynihan

Conservation Areas. These are part of what makes London special, and gives normal, common people the chance to live somewhere beautiful. This plan weaken protection and allows developers to do what they want , it's already hard enough to stop them destroying beautiful things

User: West Chiswick and Gunnersbury Society

Policy HC 1 Heritage Conservation and Growth As BCC we consider it imperative that development should be heritage-led.

It is essential to consider the impact of development on important site lines and vistas from major historic open spaces, but consideration of impacts should not be confined to these. Part of the value of the built and natural heritage is in the assemblage. Views assessed with respect to a particular site-line or vista provide snap-shots from a specific point but the impacts of tall buildings are felt over a wide area. People move and how they experience their surroundings is dynamic; a tall building will not suddenly disappear as people move from the chosen view point to walk down their street, stroll through the park, across the green, along the river tow-path or visit the cemetery.

In responding to LB Hounslow's Preferred Option Consultation on the **Great West Corridor** in December 2017 we stated:

We recommend the addition of “Developers should be expected to engage positively with the purpose and core principles of chapter 6 of the Local Plan as articulated in Our Approach to Policy CC1 and to Policy CC4 and in paragraphs 6.1, 6.12 and 6.13.”

With respect to our part of West London so much damage has already been done or is “consented” by granting permission for tall buildings, that there needs to be a recognition that we are at a “tipping point”. Without a strong commitment to valuing and protecting the surrounding heritage assets, irreparable harm will be inflicted on them to the impoverishment of our lives and those of future generations.

The big attraction of the wider area for visitors as well as those who live and/or work here is that, while easily accessible from Central London, it has significant heritage landscapes and a beautiful stretch of the Thames which, together with its predominantly low-rise buildings give much of it a generous, open, almost rural feel. This is complemented by its compact townscape of predominantly Victorian and Edwardian terraces, providing homes to its well-established, thriving residential communities. The special appeal of both is that they provide respite and retreat from the urban environment.

With respect to the **Comments from The Kew Society**, we share their major concerns namely:

- The overemphasis on growth in the South–East rather than a wider look at sustainable growth in the UK as a whole;
- The weakening of protection of our green spaces and Metropolitan Open Land, including for the river Thames;
- The protection of the World Heritage status of the Royal Botanic Gardens, Kew;

- The need to identify funding, particularly for the necessary infrastructures to support housing growth, and
- An erosion of localism with insufficient flexibility left to Boroughs to achieve agreed overall aims.

User: London Assembly Planning Committee

Recommendations Policy HC1 needs to strengthen its language to reflect the importance of ‘preserving’ and ‘enhancing’ London’s heritage, to better reflect the intentions set out in the 1990 Listed Buildings and Conservation Areas Act that is still the principal legislation reflecting heritage assets. An equivalent level of protection for London’s heritage should be given alongside that accorded to open space in policies G1-G4, for example. The Mayor should consider retaining the essential policy objectives expressed in the current London Plan policy 7.9 (Heritage led regeneration). This would be of particular assistance in achieving the intensification of suburban areas of London that the Mayor is seeking. The Mayor needs to commit to producing a Heritage SPG. This will assist hard-pressed local authorities and bring the Plan in line with the intention set out in paragraph 126 of the NPPF. The Plan’s glossary (sustainable development, page 526) should reflect that the historic environment is an essential part of sustainable development and growth

8.1 Paragraph 126 of the NPPF states that local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance.

8.2 We recommend the production of a Mayoral Heritage Strategy for London as a free-standing document. This will assist hard-pressed local authorities and bring the Plan in line with the intention set out in paragraph 126 of the NPPF.

8.3 Historical and archaeological matters should be read through to both natural environment policies and to polices covering other features, such as canals, whose historic component is an essential part of their character and importance. This is because the historic and archaeological environment is potentially very broad, including such places as ancient woodland, canals, rivers and their riparian areas, commons and parklands, and previously industrial and military sites.

8.4 The definition of sustainable development for the purposes of plan-making and decision-taking is in the NPPF (paragraph 7). This identifies three strands, economic, social and environmental, as contributing. The historic environment is identified within the environmental dimension, and is one of the core planning principles (paragraph 17). The Plan’s glossary (sustainable development, page 526) should reflect that the historic environment is an essential part of sustainable development and growth.

User:	Save Hackney Wick

There should be a broader scope for the definition and understanding of heritage, which includes social and cultural heritage. In Hackney Wick Fish Island the area has developed a distinct character, which is not reflected solely in its buildings but in the way the buildings are occupied by people.

User:	Better Bankside Business Improvement District

Better Bankside are widely supportive of the Mayor’s policy proposal concerning heritage conservation and growth.

Indeed, Better Bankside welcomes a policy framework which ensures that development proposals consider the context in which they are situated and outlines the necessary considerations to conserve an area’s existing architectural heritage but also reflect and enhance its historic character to develop a sense of place that remains sensitive to its environment.

As part of a wider programme of public realm improvements along Borough High Street, Better Bankside have embarked on an exemplar project named the Inns and Yards3. This project intends to provide a safer, healthier connection between the attractions along Borough High Street and London Bridge station. However, additionally driving the project’s ambition is telling the story surrounding street’s former uses. This will be achieved through a carefully considered choice of materials, graphics and layout decisions that echo the Inns and Yards’ history, whilst enhancing the existing heritage features.

User: Hampstead CAAC

HERITAGE

Heritage policy HC1 para B3 re integrating innovative etc. schemes into heritage settings. Dangerous allied with ‘suitable sites’ ‘intensification’ ‘density’ means Redfrog and some Hampstead sites highly vulnerable to harmful development with developers looking both to over-develop sites and re-define ‘harm’ threatened to CAs

B4 also continues the thread. Benefits, economy etc. In NPPF terms this is a killer. Even the NPPF doesn’t spell out heritage treatment in so clear a way as to threaten our sites.

Check NPPF heritage etc. – CAs.

CA statements don’t protect if developers can prove their designs are worthy. Such considerations become ‘planning matters’ where ‘aesthetics’ do not much figure. The London Plan needs to persuade LPAs of the desirability of full appreciation of architectural quality in new schemes and protection of heritage.

User: Grosvenor Britain & Ireland

Heritage and Culture

We share the Plan's aspiration to see the heritage of London's built environment enhanced, and as custodians of Mayfair and Belgravia tackle the choices in play day-to-day. We have long argued that for too many years the success of central London and the West End have been undermined by a false trade-off between economic growth, the creation of new jobs and enterprises, and a better experience for residents; or between densification and enhancing the unique character of historic built environment. Heritage policy should not perpetuate that false trade-off.

We welcome the Mayor's strengthened ambition to grow and improve London's cultural offer. We believe planning policy has an important supporting role to play - with for example an unambiguous definition of temporary use and the ability to change uses on a temporary basis without the need for formal consent.

User:	London Borough of Haringey

Haringey supports this policy, recognising that there needs to be a balance between providing growth within the Borough, whilst preserving and enhancing heritage assets within the Borough.

User:	London Borough of Barking & Dagenham

The Council strongly supports the focus on preserving and enhancing London’s historic environment. We also recognise the positive impact of culture on health. As such we would like to see the policy HC1 B4 strengthened to specifically mention the benefits to health (as well as social) well-being.

User:	Environment Agency
We welcome the recognition that the Mayor attaches to the capital’s heritage assets and historic environment, including its waterways, and their value to the vibrancy and success of the capital.	

User: London Borough of Lewisham

We support HC1, especially the use of a Heritage Strategy, in line with the NPPF and a more detailed policy on archaeology.

Questions have been raised that HC1 implies that assessments of Heritage Assets should be done in advance (as opposed to current London Plan where this takes place when development is proposed). HC1 also encourages more proactive work on Heritage at Risk than the current London Plan. London Boroughs will need to identify specific opportunities for Heritage at Risk to contribute to regeneration and place-making, and they should set out strategies for their repair and re-use.

Further consideration should also be given to:

- Whether the policy should be worded differently as it is very interpretive and not clear. What is meant by ‘creative contextual architectural responses’? What is meant by ‘utilising the heritage significance of a site or area in the planning and design process’?

Whether there can be better integration between heritage and design policies or make direct references to each other. Development should consider both heritage and design together in tandem and London Boroughs now have Design and Conservation Officers as one role, or at a minimum work as a coordinated department as a result of the current London Plan.

User:	London Borough of Lewisham

Boroughs are expected to develop up-to-date Archaeological Priority Areas, which are classified using a tier system. This is more prescriptive than current Plan.

User:	London Borough of Brent

The Council supports this policy.

In particular, the Council welcomes the statement in HC1C which states "The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed".

User:	London Borough of Bromley

The introduction of this new policy which builds more explicitly on the aims and principles of the National Planning Policy Framework around heritage and design than existing policies 7.8 and 7.9 of the adopted 2016 London Plan, is welcomed.

User: Old Bermondsey Village Neighbourhood Forum

Aside from a marked reduction in the importance given to neighbourhood planning, our overarching criticism is that there is no clear instrument that checks development targets demanded of local authorities (especially in Opportunity Areas) by policies GG2, H1, H2, D6 and D8 against the importance of the preservation and enhancement of the social and built fabric of London highlighted in policies H5, H6 HC1, HC3, HC5, and HC7.

We think there is a need to balance the opportunities offered to local authorities in the DLP by way of identifying, protecting and nurturing the distinct identity of areas as the basis for sustainable development versus the potential abuse of these opportunities by planning departments – in particular where potential exists for opportunity areas, site allocations and cultural quarters to become used as guises for insensitive profit driven high-rise and monouse (housing dominated) development.
Neighbourhood Forums should be empowered to have a better part to play in this by the DLP.

The New Southwark Plan for example has just completed formal consultation ignoring widespread calls for a borough wide local list. It contains deeply unsound Area Visions and Site Allocation Policies that ignore local consultation and make no reference to key guidance like Historic England's Advice Note 3 for example.

User: London Borough of Tower Hamlets

Overall we are not supportive of the approach contained in this policy, although the emphasis it puts on having good information and a conservation strategy is helpful as we have a recently adopted conservation strategy.

The policy seems to have moved away from ensuring that development respects and integrates with the historic context, and towards development which protects heritage as a result of its quality. The existing policies feel more objective, whilst these changes feel like they can be used to justify proposals purely on design quality and are therefore more subjective. The integration of proposals with their context and design quality are not mutually exclusive aspects of an application, but rather are complimentary.

There is also less about local character in the new plan than in the current one. Formerly in one policy it has now been distributed and is covered in a number of policies, this feels like a dilution (see H2B1). It is suggested that ‘sensitive’ might be a better word to replace ‘innovative’ in policy B3.

User:	Royal Borough of Kingston

Support, particularly for enhancement of the historic environment rather than just conservation and the recognition of harm to the historic environment through cumulative impact and incremental change.

User: Save Swiss Cottage

HERITAGE CONSERVATION AND GROWTH: POLICY HC1

34. The Draft London Plan recognises the risk of cumulative harm to a heritage asset (such as a Conservation Area), resulting from individual planning applications (each of which is judged to result in no harm, or to result in less than substantial harm which is outweighed by the public benefits of the proposals). However, it simply states that this risk should be "actively managed". This is a meaningless phrase. Policy HC1 should be amended to state as follows:

"The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed, and taken into full account when harm to heritage assets is being assessed"

User: London Borough of Hillingdon

Specific comments on this policy are as follows
• Criterion A should read:
‘...This evidence should be used for identifying, understanding, conserving and enhancing the significance of the historic environment and heritage assets…’
• Criterion B, part 2 of the policy should refer to:
‘ ….structure, site or area….’
• Criterion C should read:
‘Development proposals affecting heritage assets and their wider settings should seek to conserve and enhance the historic environment and be sympathetic to the asset’s significance. Development proposals should avoid harm to assets and make a positive contribution to local distinctiveness and character. Opportunities to enhance heritage assets and better reveal their significance should be considered at the commencement of the design process.’
• Paragraph 7.1.4, should be amended as follows:
‘..In addition to utilising this record, borough townscape and character appraisals, conservation area appraisals and management plans, Local Lists and gazetteers, local heritage guidance and heritage agreements should be used…’

In paragraph 7.1.7, heritage significance should be defined as per the NPPF and this should be included in the glossary of the London Plan.

User: London Borough of Hackney

Para A: This is a welcome strengthening of existing policy, requiring not just identification but evidence and understanding.

Para B: This is a welcome strengthening of existing policy, requiring a clear vision, utilising significance in the design process, integrating conservation and delivering positive heritage benefits.

Para C: Previous Paras C and D merged into one Para C. This is a welcome strengthening of existing policy, with new requirements to consider cumulative impacts on setting and to identify enhancement opportunities by integrating heritage considerations early on in the design process.

Para D: This is stronger with new requirements for identification earlier and designing around archaeology, landscapes mentioned, greater clarity on protection of not yet scheduled remains. This is a welcome strengthening of existing policy, although the requirement for public display “where appropriate” seems to have been lost in the changes.

Para E: Heritage at Risk. “Where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and re-use.”

This is a new policy and is welcomed. Funding for Heritage at Risk Officers will be required to make this work well. It may be unrealistic for boroughs to set out strategies for the repair and re-use of buildings which they do not own or control.

User:	London Borough of Hounslow

LB Hounslow supports approach taken by the plan to protecting heritage and culture, with particular reference to the concept of incremental change this is particularly relevant for Hounslow given its proximity to Kew Gardens World Heritage Site.

User:	Ms R Farooq

Private and public gardens should be protected alongside other local green and open spaces.

User:	Hammersmith and Fulham Disability Forum

41. Policy HC1 Heritage conservation and growth.

We recommend linking this policy with D3 Inclusive Design and include relevant English Heritage guidance on easy access to historic buildings and landscape.

User: Westminster City Council

We welcome recognition of the importance of heritage in contextualising new development and of promoting high standards of modern architecture as London evolves, through a collaborative approach with a range of stakeholders. This will be particularly important in Westminster, given the range of heritage assets within the City.

However, the policy does in parts provide unnecessary duplication of the NPPF. Criterion A duplicates guidance from paragraph 169 of the NPPF, whilst criterion E duplicates paragraph 126 of the NPPF.

Within the supporting text, paragraph 7.1.9 is unnecessary. Through Historic England, the Greater London Archaeological Advisory Service provide archaeological advice and identify priority areas for boroughs.

User:	London Borough of Southwark

The council recommends the guidance relating to heritage significance (7.1.7) should be amended to reference the historic use of the building, which may be the reason behind the original designation and significance.

The council considers HC1A should clarify what constitutes ‘evidence’ that demonstrates London’s historic environment.

The council also recommends the policy should explicitly consider the relative importance of Grade I and Grade II listed buildings.

User:	London Borough of Redbridge

The Council supports and welcomes this policy overall. The policy reflects a considered and good practice approach to the protection of heritage assets and archaeologically. However the policy does not go far enough in stating explicit consideration of undesignated assets, which make up large areas of important local character.

On a separate issue figure 7.2 shows an earlier boundary of the Woodford Broadway Conservation Area. This has been extended to include the wider residential area of Monkhams. The Council can provide updated mapping to assist the GLA on this.

User:	London Borough of Wandsworth
Welcome the recognition of the importance of the historic environment by keeping an evidence base. The Council has used its evidence base on heritage assets to inform the guidance in its Historic Environment SPD which is now adopted following public consultation.	

User:	London Borough of Richmond Upon Thames

Welcome the recognition of the importance of the historic environment by keeping an evidence base. The Council has used its evidence base on heritage assets to inform the guidance in its Historic Environment SPD which is now adopted following public consultation.

User:	London Borough of Harrow

Harrow supports this policy, recognising that there needs to be a balance between providing growth within the Borough, whilst preserving and enhancing heritage assets within the Borough.

User: Royal Borough of Greenwich

HC1A

Clarification needed. The form of evidence required should be clearly defined, and example documents cited, to assist with implementation of this policy (and also successful implementation of Policy D2, which also requires evidence on the historic environment).

HC1B

This policy contains long and confusing syntax so that the gist of the policy is difficult to grasp. How can knowledge set out a clear vision? Suggest text is simplified so responsibilities of decision-takers and plan-makers are made more explicit.

HC1D

This policy states that ‘development proposals’ should identify assets of archaeological significance. Within the policies under HC1 there is no provision for boroughs to identify and understand those assets themselves (for archaeology, only improving access is required under HC1A). Therefore the identification of archaeological assets as a statutory requirement is reliant on developers and applicants only. It is conceivable that information on archaeological assets could be omitted from development proposals. Therefore it is suggested that the requirement for boroughs to identify sites of archaeological interest and develop current APAs for decision-taking and plan-making (set out in 7.1.9) should be made a statutory requirement and moved to the Policy section. This would strengthen the protection for archaeological assets.
This policy also states that undesignated archaeological assets equivalent to a scheduled monument (SAM) should be given equivalent weight to designated assets. How is status equivalent to a SAM measured and defined? How will boroughs know when to give an undesignated asset equal weight to a designated asset? This needs to be clarified.

HC1E

Support the new requirement for boroughs to identify opportunities for heritage assets ‘as risk to contribute to regeneration and place making.

User: Royal Borough of Greenwich

HC1D

This policy states that ‘development proposals’ should identify assets of archaeological significance. Within the policies under HC1 there is no provision for boroughs to identify and understand those assets themselves (for archaeology, only improving access is required under HC1A). Therefore the identification of archaeological assets as a statutory requirement is reliant on developers and applicants only. It is conceivable that information on archaeological assets could be omitted from development proposals. Therefore it is suggested that the requirement for boroughs to identify sites of archaeological interest and develop current APAs for decision-taking and plan-making (set out in 7.1.9) should be made a statutory requirement and moved to the Policy section. This would strengthen the protection for archaeological assets.

User:	Royal Borough of Greenwich

This paragraph repeats a similar paragraph within the NPPF. Surely all neglect is deliberate, i.e. a failure to care for something, an act of negligence. The presence of this word means that this policy does not get utilised often enough, due to the uncertainty surrounding the word ‘deliberate’.

User:	Royal Borough of Greenwich

Clarification required. How is a significant archaeological asset defined? If this equates to SAMs and to assets within a Tier 1 APA this should be indicated.

User: London Borough of Harrow

SI6: Digital connectively infrastructure

The Council supports this policy.

The policy however should be linked to Good Design Policy (D2) and Heritage Conservation and Growth (HC1) as some ancillary structures can be unsightly, and also erode the good design quality of developments/public realm.

User:	The Wimbledon Society

As mentioned above, the draft Plan contains a multitude of considerations for boroughs to take into account, but it provides little help to the boroughs, in particular funding to retain or improve heritage, culture or open space, such as Metropolitan Open Land. We would argue for a London-wide Heritage Grant scheme for small scale basic repairs to Heritage Assets.

User: Mr Joe Ward

The draft Plan gives insufficient consideration to the protection and enhancement of London's diverse local character. Policies D1 and HC1 need to be amended to ensure that greater attention is given to the character map of London, and community or neighbourhood plans, in planning and designing new development.

Proposed changes:

The first sentence of Policy D1 'London's form and characteristics' should be amended to make specific reference to neighbourhood and community plans so that it reads **'Development Plans, area-based strategies, neighbourhood and community plans. and development proposals should address the following:'** The phrase **'reflect and enhance local character and distinctiveness'** should be added to the list after 1) in Policy D1A.

The first sentence of Policy HC1 'Heritage conservation and growth' should be revised so that it reads: '**Boroughs should, in consultation with Historic England, other relevant statutory organisations and local community and neighbourhood planning groups, develop evidence that demonstrates a clear understanding of London's historic environment, local character and distinctiveness.**'

Rationale: The diverse and distinctive local character of London's neighbourhoods are a major component of its attractiveness and vitality. Recent and future development to accommodate the need for new housing and economic activities risks damaging the distinctive character of London resulting in homogenous 'anywhere' places unless greater attention is paid to the underlying character of its diverse neighbourhoods. Neighbourhood plans and other community planning initiatives are a potentially important means of identifying local character and distinctiveness and should be actively promoted in the London Plan

User:	The Wimbledon Society

HC1: There should be a London-wide Heritage Grant scheme for small scale basic repairs to Heritage Assets: if this were to be funded direct by HMG, then the eventual receipts from the normal taxation of (mainly smaller) building firms and VAT would make the scheme self funding

User:	London Borough of Enfield

Policy HC1 ‘Heritage conservation and growth’ needs stronger recognition of the need to avoid and minimise harm for all heritage assets as they are a finite resource. The supporting text could do more in referencing the value of locally-led and small scale heritage projects and the examples given could encourage the use of heritage ‘totems’ or evocation of form rather than conservation and re-use. The list of what can represent heritage significance makes no mention of how patterns of use characterise certain areas and more consideration should be given to unsympathetic change and how this should be assessed and what weight it should be given. It also needs to need be more firm on protecting the setting of heritage assets and the need to avoid harm.

User: Mama Ujuaje

Suggested rewording as:

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

1. setting out a clear vision that recognises and embeds the role of the relevant cultures and heritages in place-making
2. utilising the heritage significance of a site or area in the planning and design process
3. integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place
4. delivering positive benefits that sustain and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing in a manner which reflects the local values of all communities which have helped shape its heritage value.

Where heritage assets have been identified as being At Risk, boroughs should, in consultation with local community representation, identify specific opportunities for them to contribute to regeneration and place-making, and they should collaboratively set out strategies for their repair and re-use.

To the series of maps in this section a further map could be added: to indicate those community assets which contribute to the place making of a location within London, identifying those which are under threat and those which have disappeared in the last five and ten years.

User: National Grid

We are committed to preserving, recording and celebrating gasworks heritage for future generations. We do this in numerous ways, including reflecting heritage through great scheme design and turning artefacts into art within our public realm. Across all our portfolio we collect and gift artefacts, undertake enhanced photographic recording, invest in public art, engage with local communities and educate school children in STEM while celebrating social history linked to gasworks heritage.

We are demonstrating in London, at sites like Prince of Wales Drive, Battersea, our experience of finding the balance between preservation and progress. We’re proud of the pro-active approach we take to heritage engagement and believe the industrial spirit of our portfolio can be captured without the need to retain structures.

The retention of gasholders and buildings on grounds of heritage conservation has a significant impact on viability and the delivery of affordable housing, and therefore decisions to put statutory protection on these structures should be carefully considered.

User: Just Space

Policy HC 1 Heritage, Conservation and Growth

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

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

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

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

Changes

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

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

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

Map of community assets in Tottenham :

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

Map of community assets in South-Kilburn :

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

Map of community assets in Walworth:

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

User: Kingston University

Policy HC1 Heritage conservation and growth

The important contribution that heritage assets can play to creating a sense of place is recognised and Policy HC1 is therefore supported by the University.

General Comment

The draft plan takes a significantly more prescriptive approach than its predecessor with policies intended to be applied directly in determining planning applications. We are aware of RBK and Kingston First's concern that this prescriptive approach could alter the hierarchical relationship intended to exist between the GLA and Local Planning Authorities, and may adversely affect an authority's ability to effectively manage and shape the future prosperity of its administrative areas. The University agrees with the concerns raised by RBK and Kingston First in this regard.

User: London Borough of Bexley

Policy HC1 Heritage conservation and growth, which echoes the requirements of the National Planning Policy Framework and related guidance to record and protect heritage assets and their settings, is welcome. London's hugely diverse range of heritage makes it not only a great place to visit but also to live. From internationally significant World Heritage Sites to attractive historic buildings that dot neighbourhoods across the capital, heritage adds to the richness of everyday London life. Bexley's historic and cultural assets are testament to its rich history and provide a vital benefit to residents and visitors. In Bexley, there are over 150 listed buildings and structures on the National Heritage List for England, nearly 400 on the Council's Local List, and 23 conservation areas. Bexley's heritage sites are well loved and well used by both local residents and visitors from much further afield.

It is important, however, that development that affects heritage assets not just conserve these assets, but also enhance them. Therefore, it is recommended that **Part C** of **Policy HC1** be amended to include the term 'enhance.' Development that affects heritage assets should not just attempt to do no harm, but should in fact do good. Development often provides an opportunity to enhance heritage assets. For instance, development within the setting of a heritage asset that achieves high quality design, which responds to and is inspired by that heritage asset, can often enhance the setting of that heritage asset.

Enhancement could also be achieved through heritage gain, where a Section 106 agreement is used to pay for improvements to a heritage asset. Development could also enhance a heritage asset when the asset itself is developed, by providing it with a new lease on life as a viable building with a purpose. However, this should not encourage deliberate neglect of an asset and **Paragraph 7.1.8** supports this position.

Part C of **Policy HC1** also requires that development proposals seek to avoid harm. Development proposals that cause harm should be refused. Where there is identified harm to the significance of a heritage asset, local authorities should work with the applicant to address that harm, either through changes to design or through the payment of planning gain. This is an important and discreet element of Part C, and as such, it is recommended that this be separated into its own part of the policy.

User: Ealing Matters

As stated, the policies are laudable. They reflect the guidance provided in eg the NPPF and are not dissimilar to the policies in the existing London Plan. Our concern is in the way the policy is applied in Ealing - or not applied. There are too many examples of developments that manifestly conflict with the Plan's heritage policies which the Mayor disregards when he is consulted about proposals. The policy therefore needs to be much more tightly drawn to prevent this, and when commenting on Borough proposals either in their local plans or on major developments referred to him, the Mayor should insist that HC1 policies are implemented as completely as the Plan's housing policies.

User: Redington Frognal Neighbourhood Forum

This policy is not sufficiently robust on the value of heritage and London's exceptional heritage assets. The adverse impact of tall buildings on the skyline and on world heritage sites has also not been adequately addressed. The role of neighbourhood forums and other community groups is again omitted. The following revisions are therefore suggested.

HC1 A. The first sentence is to be amended to read, "Boroughs should, in consultation with Historic England, national amenity groups, neighbourhood planning and local community groups, and relevant expert groups, develop evidence that demonstrates a clear understanding of London's historic environment, local character and distinctiveness.

HC1 B 2) The existing text is to be replaced by, "to preserve, enhance, and utilise the heritage significance of a site or area in the planning and design process."

HC1 C. The second sentence is to be reworded as follows, "The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed, and taken into full account when harm to heritage assets in being assessed in decision making on applications."

User:	Association of Local Government Archaeological Officers (ALGAO)

Support this policy as worded and regard it as vital to the delivery of sustainable development in London. We welcome recognition of the London Archaeological Priority Area Review Programme and the Greater London Historic Environment Record. Figure 7.5 will need to be updated in the final version of the plan to include all boroughs where reviews will have been completed by then – adding in at least Camden, Hackney, Islington, Southwark and Wandsworth.

User: CPRE London

Local character

The draft Plan gives insufficient consideration to the protection and enhancement of London's diverse local character. Policies D1 and HC1 need to be amended to ensure that greater attention is given to the character map of London, and community or neighbourhood plans, in planning and designing new development.

Proposed changes:

The first sentence of Policy D1 'London's form and characteristics' should be amended to make specific reference to neighbourhood and community plans so that it reads **'Development Plans, area-based strategies, neighbourhood and community plans. and development proposals should address the following:'** The phrase **'reflect and enhance local character and distinctiveness'** should be added to the list after 1) in Policy D1A.

The first sentence of Policy HC1 'Heritage conservation and growth' should be revised so that it reads: '**Boroughs should, in consultation with Historic England, other relevant statutory organisations and local community and neighbourhood planning groups, develop evidence that demonstrates a clear understanding of London's historic environment, local character and distinctiveness.**'

Rationale: The diverse and distinctive local character of London's neighbourhoods are a major component of its attractiveness and vitality. Recent and future development to accommodate the need for new housing and economic activities risks damaging the distinctive character of London resulting in homogenous 'anywhere' places unless greater attention is paid to the underlying character of its diverse neighbourhoods. Neighbourhood plans and other community planning initiatives are a potentially important means of identifying local character and distinctiveness and should be actively promoted in the London Plan

Protecting and extending green space

User: British Property Federation

We are encouraged that the Mayor recognises the vital role that heritage can play in contributing to the capital's ability to grow. In addition, the approach of considering heritage and culture together in one single chapter with the emphasis on their clear links and ability increase the economic, environmental and social value of London is welcome.

BPF members place significant value on the historic environment. Maintaining historic buildings in economic use, introducing new uses for heritage assets and integrating historic buildings within newer schemes all present opportunities for conservation and enhancement, together with new development, to work together and transform the built environment and public realm for communities.

User: Claire Mellish

7 Heritage and Culture (HC policies) 267 / 285

The draft Plan gives insufficient consideration to the protection and enhancement of London's diverse local character. Policies D1 and and HC1 need to be amended to ensure that greater attention is given to the character map of London, and community or neighbourhood plans, in planning and designing new development. Proposed changes: The first sentence of Policy D1 'London's form and characteristics' should be amended to make specific reference to neighbourhood and community plans so that it reads 'Development Plans, area-based strategies, neighbourhood and community plans. and development proposals should address the following:' The phrase 'reflect and enhance local character and distinctiveness' should be added to the list after 1) in Policy D1A.
The first sentence of Policy HC1 'Heritage conservation and growth' should be revised so that it reads: 'Boroughs should, in consultation with Historic England, other relevant statutory organisations and local community and neighbourhood planning groups, develop evidence that demonstrates a clear understanding of London's historic environment, local character and distinctiveness.'

User: S Place

Protectin g the heritage and culture of any community is of vital importance.

Earlier polices of allowing infill building in Conservation Areas & Areas of Special Local Character must be deleted from the draft plan if these areas are going to keep their special character. The same applies to the Statuary Listed Buildings and Locally Listed Buildings, not all of these are in Conservation Areas, therefore there should be stronger protection to stop all of these being swallowed up by inappropriate developments.

Thus making sure this draft plan is in line with the NPPF.

User: Canal & River Trust

The Trust's waterways provide an important cultural resource for London in themselves, as 200 year old working heritage and an inclusive and free space for citizens and visitors to enjoy. They also provide a stage and a setting for more distinct cultural activities, such as public art, theatre, poetry and film. We are keen to work with the Mayor to capitalise on the cultural opportunities that the waterways provide.

Policy HC1 – Heritage conservation and growth (Suggested Amendment)

The Trust broadly welcomes policy HC1, including the proposal that regeneration should be driven by a clear vision that recognises and embeds the role of heritage in place-making.

Para 7.1.2 states that 'non-designated assets cover an even wider range of features including buildings of local interest, most archaeological remains, canals, docks and waterways, historic hedgerows and ancient woodlands'. Whilst we welcome the recognition that canals, docks and waterways are at the very least non-designated heritage assets, it should be recognised that these are also commonly appropriate subjects for the designation of Conservation Areas or Listed Building status, including some Grade I listings. We suggest that para 7.1.2 is redrafted as follows:

'Non-designated assets cover an even wider range of features including buildings of local interest, most archaeological remains, canals, docks and waterways, historic hedgerows and ancient woodlands, where these are not already the subject of formal designations'

London's network of waterways is the culmination of two millennia of cumulative manipulation of the natural configuration and character of the Thames and its tributaries, augmented by the development of navigations and the construction of canals and docks. As a primordial element of the complex web of inter-connecting transport routes, waterways have fundamentally helped to shape the historic grain.

Waterways are a spatial entity that transcends the boundaries between boroughs/cities, yet planning designations that acknowledge and protect their historic integrity as continuous, linked corridors, often exhibiting a coherent vernacular, are limited. The London Plan therefore has an important role to play in overcoming this fragmented picture, by providing a strategic overview of waterways as a layer of urban history and development, that deserves a consistent conservation approach.

We suggest that this should be reflected in para 7.1.6.

Historically, London has demonstrated an ability to regenerate itself, which has added to the city's distinctiveness and diversity of interconnected places. Today urban renewal in London offers opportunities for the creative re-use of heritage assets and the historic environment as well as the enhancement, repair and beneficial re-use of heritage assets that are on the At Risk Register. In some areas, this might be achieved by reflecting existing or original street patterns and blocks; in others, it will be expressed by retaining and reusing buildings, spaces and features that play an important role in the local character of an area. In addition, opportunities should be taken sensitively to re-activate and enhance historic waterside places, based on a sound understanding of the heritage of the waterway network and acknowledging the key role that it historically played in shaping urban development. Figure 7.4 illustrates the broad characteristics of London as derived from its historical development, which can be used to inform evidence bases for area-based strategies.

In the key of Figure 9.6, '6. Regents Canal' should be "6. Regent's Canal"

User:	Brixton Society

HC1, Conservation etc: We are in sympathy with the policy, but although the number of Conservation Areas is highlighted in Fig.7.2, we are disappointed that they are only treated as a restriction, rather than as focal points for improvement or enhancement of the street scene. Residents groups and amenity societies would like to be more actively involved in positive measures to improve the environment and promote better standards in refurbishment.

User: Silvertown Homes

The draft London Plan sets out policy positions on heritage which differ from what is set out in the NPPF. For example, Policy HC1 Heritage conservation and growth for instance supports ‘creative contextual architectural responses that contribute to their significance and sense of place’.

The use of ‘contribute’ in the quote alongside could be read as meaning ‘positively contribute’. If this is the intention then this approach is not consistent with the NPPF. The draft London Plan must be set out so that it is consistent with national planning policy.

User: London Property Alliance

The Alliance welcomes the recognition of the need to consider the benefits of development to economic viability, accessibility and environmental quality when preparing development strategies (Policy HC1(B)(4)).

The Alliance strongly recommends the introduction of additional policy text into HC1 to recognise these potential benefits at development management stage. This would ensure that the potential benefits of development – including its contribution to addressing London's housing supply – are properly taken into account when undertaking the balancing exercises required by the NPPF and the statutory tests.

We suggest an additional paragraph of text:

"In determining planning applications for development that potentially affects the significance of heritage and designated heritage assets, the social, economic and environmental benefits of the proposal (including, but not limited to, the development's contribution to addressing London's need for more housing, affordable housing and commercial space) may be treated as public benefits of significant weight when weighing the benefits of development against any heritage harm."

The Alliance supports the aim to protect archaeological assets, however the sentence in paragraph 7.1.11 should be amended as follows:

"The physical assets should, where possible and appropriate, be made available to the public on-site."

User:	Mr Paul McQuillen

The first sentence of Policy HC1 ‘Heritage conservation and growth’ should be revised so that it reads: ‘**Boroughs should, in consultation with Historic England, other relevant statutory organisations and local community and neighbourhood planning groups, develop evidence that demonstrates a clear understanding of London’s historic environment, local character and distinctiveness.**’

User:	Camden Town Conservation Area Advisory Committee

HC1 A Draft policy: ‘Boroughs should, in consultation with Historic England and other
relevant statutory organisations, develop evidence that demonstrates a clear understanding of London’s historic environment.’

Our proposed amendments – reasoning: to achieve consistency with the Plan’s general aim of working collaboratively with stakeholders, including local communities, and to recognize the long-standing role, and value, of local and specialist expertise, including local and national amenity bodies.

Our proposed revised text: ‘Boroughs should, in consultation with Historic England and other relevant statutory organisations, local community groups, local and national amenity groups, and relevant expert groups, develop evidence that demonstrates a
clear understanding of London’s historic environment.’

User:	Camden Town Conservation Area Advisory Committee

Draft policy: ‘utilising the heritage significance of a site or area in the planning and design process’

Our proposed amendments – reasoning: to achieve better consistency with legislation on conservation areas and Listed Buildings.

Our proposed revised text: ‘to preserve, enhance, and utilize the heritage significance of a site or area in the planning and design process’

User: Camden Town Conservation Area Advisory Committee

HC1 C

Draft policy: '… The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed. …'

Our proposed amendments – reasoning: We welcome this policy and the recognition of the importance of cumulative impacts. Failure to assess cumulative impacts is a serious weakness in current heritage management. We seek to make it more effective.

Our proposed revised text: '… The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed, and taken into full account when harm to heritage assets in being assessed in decision making on applications. …'

User:	Camden Town Conservation Area Advisory Committee
We would welcome a presumption against planning consent for the installation of air-conditioning plant in traditional buildings.	

User:	The British Library

Policy HC1 – Heritage conservation and growth

The British Library itself is a Grade I listed building and other landholdings are within proximity to the Kings Cross/St Pancras Conservation Area and therefore, this policy is considered to have significant importance to the Library.

It is fully acknowledged that development proposals affecting heritage assets and their setting requires careful consideration. However, it is still vitally important to ensure that a positive emphasis is placed upon any associated or neighbouring development, by integrating heritage considerations early on in the design process. Ensuring progress can be made both within and adjacent to existing heritage assets will ensure that they remain well used and relevant for many years to come.

User:	London Borough of Sutton

SUPPORT. The London Borough of Sutton welcomes Policy HC1 Heritage conservation and growth, which complements the objectives for the Heritage Action Zone in Sutton.

User:	London Borough of Newham

Policy HC1 Heritage conservation and growth

LBN support this policy and it is considered to be complementary to Newham's Draft Revised Local Plan. However, structurally, having these policies divorced from design policies (HC1-4) is unhelpful

User:	Exhibition Road Cultural Group
We welcome the measures to support heritage and culture in policy HC1.	

User: CFGN Community Food Growers Network

Suggested changes to HC1

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

1. setting out a clear vision that recognises and embeds the role of the relevant cultures and heritages in place-making
2. utilising the heritage significance of a site or area in the planning and design process
3. integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place
4. delivering positive benefits that sustain and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing in a manner which reflects the local values of all communities which have helped shape its heritage value.

Where heritage assets have been identified as being At Risk, boroughs should, in consultation with local community representation, identify specific opportunities for them to contribute to regeneration and place-making, and they should collaboratively set out strategies for their repair and re-use.

To the series of maps in this section a further map could be added: to indicate those community assets which contribute to the place making of a location within London, identifying those which are under threat and those which have disappeared in the last five and ten years.

User:	Blackheath Society

Policy HC1 Heritage conservation and growth: Sections C and D acknowledge the importance of heritage/historic assets and their settings but are worded in such a way as to create a presumption for development with a subsidiary need to ‘actively manage’ cumulative impacts and ‘minimise’ and ‘mitigate’ harm. There should instead be a clear requirement for the value of heritage assets to be given explicit and significant weight in planning decisions and appropriate protections afforded to them as per the suggested wording above. There should be wording requiring ‘protection from inappropriate development’ rather the weaker ‘giving consideration to the impact of unsympathetic development’. The wording in paragraph 7.1.7 is weak and there is no guidance comparable to that provided in the 2016 plan.

User:	Landscape Institute London

LI London supports the proposals and policies in the heritage sections of this chapter (7.0 - 7.4.1 and policies HC1-4) which are well considered and provide clear policy guidance.

User: Highgate Society

HC1(A) -Support

This is a good and strong statement with clear heritage-led objective.

HC1(B.2) - Object

This is a clear directive, but the Society has seen little evidence that the two major boroughs with which it deals have dealt effectively with this, where the fundamental issue is one of implementation and enforcement. To strengthen this, it is suggested that the following is added "The cumulative effect of incremental change from development on Heritage Assets, particularly Conservation Areas……."

HC1(B.3)- Object

This Policy is somewhat contradictory and potentially allows for poor handling of heritage/conservation areas under the aegis of "innovation" and "creativity.". In our view it would be better to delete and let HC1(C) stand alone, since it states the same aim and intention more unambiguously. However, if it determined to retain it, its sense could be made clear by starting the paragraph: "Where regeneration or new development within Heritage Assets is necessary and appropriate, the purpose must be to integrate the conservation and enhancement…"

HC1(A) -Support

This is a good and strong statement with clear heritage-led objective.

HC1.B2 - Object

This is a clear directive, but the Society has seen little evidence that the two major boroughs have dealt effectively with this so the question is one of implementation and enforcement. To strengthen this, it is suggested that the following is added . "The cumulative effect of incremental change from development on heritage assets , particularly conservation areas……."

HC1(B.3)- Object

This Policy is somewhat contradictory and potentially allows for poor handling of heritage/conservation areas under the aegis of “innovation” and “creativity.”

HC1 (C) Support

This is a good clear and unambiguous statement which identifies both the relevance of the heritage asset as important, and the importance of managing incremental or cumulative change. This is something which has proved a particular problem in the Bishops sub-area of Highgate, and we would expect to see Conservation Area policy specifically mentioned as covered by the remit of this policy..

HC1(E) Support

This policy addresses assets “at risk” and gives good, clear direction to Boroughs not to ignore. This will be helpful where Conservation Areas, or any part of them, are identified as suffering from over-development or poor design

Para C mentions ‘developments affecting heritage assets; again, Conservation Areas need a specific reference. Therefore add “where “heritage assets including Conservation Areas have been identified etc...”

User: London Borough of Ealing

Heritage Conservation and Growth
(HC1)

The Council supports a common and consistent approach to the management of heritage in London. There is no need to continually reinvent and rephrase the same basic, key development principles in borough plans when these are already covered in both the NPPF and London Plan and this policy should aim to provide all of the necessary management tools for applications that affect heritage assets.

The policy rightly makes reference to the need for ‘regenerative change’ (HC1 B) and ‘creative re-use of heritage assets and the historic environment (7.1.6) if London is able to meet of all of its development needs in relation to housing and employment.

Some of this has to take place within or close to historic assets (for e.g. within some of the 1000 conservation areas that exist in London). The policy rightly allows Boroughs to assess and provide an understanding of their historic environment but some further policy support on achieving regenerative change in practice might be helpful.

Heritage Conservation and Growth
(HC1 C)

This clause makes a reasonable attempt at a general development management policy for heritage but could perhaps be more focused. OPDC has been working with Historic England to produce a clear and concise heritage policy and this may prove a useful model:

‘OPDC will give great weight to the conservation and enhancement of the significance of designated heritage assets, including their settings. Proposals harming the significance of a designated heritage asset should be justified having regard to their heritage interest, reasonable alternatives to avoid or mitigate harm and delivery of public benefits’

User: Northwoods Voice Limited

Chapter 7. Heritage & Culture.

Protecting heritage and culture of any community is of vital importance. To this end the Northwood Green Lane Conservation Area should be essentially preserved and enhanced. It has been threatened by earlier TfL planning applications and the measures indicated within the Draft London Plan would make this worse by further promoting “densification” and these measures are to be regretted. NVL note that the existing Northwood Station Car Park is not located within the Green Lane Conservation Area and future development in this location plus enhancements to Northwood Station itself (to provide Step Free Access) and to Station Approach (which does lie within the Green Lane Conservation Area and which leads to the existing Station Car Park) may be an acceptable development alternative for consideration.

User:	Natural England

We support the inclusion of landscapes within this policy together with the recognition of the role of this in place-making.

We are pleased to see historic hedgerows and ancient woodland included in the list of heritage assets within paragraph 7.1.2, and we **recommend** that **veteran and ancient trees** are added. Including a reference to the Ancient Woodland inventory could also assist planners in identifying larger areas of ancient woodland.

User: Chairs of Camden's Conservation Area Advisory Committees

HC1 A Draft policy: ‘Boroughs should, in consultation with Historic England and other relevant statutory organisations, develop evidence that demonstrates a clear understanding of London’s historic environment.’
Our proposed amendments – reasoning: to achieve consistency with the Plan’s general aim of working collaboratively with stakeholders, including local communities, and to recognize the long-standing role, and value, of local and specialist expertise, including local and national amenity bodies.
Our proposed revised text: ‘Boroughs should, in consultation with Historic England and other relevant statutory organisations, local community groups, local and national amenity groups, and relevant expert groups, develop evidence that demonstrates a clear understanding of London’s historic environment.’

HC1 B 2) Draft policy: ‘utilising the heritage significance of a site or area in the planning and design process’
Our proposed amendments – reasoning: to achieve better consistency with legislation on conservation areas and Listed Buildings.
Our proposed revised text: ‘to preserve, enhance, and utilize the heritage significance of a site or area in the planning and design process’

HC1 C Draft policy: ‘… The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed. …’
Our proposed amendments – reasoning: We welcome this policy and the recognition of the importance of cumulative impacts. Failure to assess cumulative impacts is a serious weakness in current heritage management. We seek to make it more effective.
Our proposed revised text: ‘… The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed, and taken into full account when harm to heritage assets in being assessed in decision making on applications. …’

User: Historic England

Policy HC1 is strongly supported.

It could be beneficial to introduce an opening sentence to the policy to set the purpose of the policy, and to make the link to the Good Growth policies.

We warmly welcome the platform provided by the opening rubric to identify, understand, conserve and enhance the historic environment.

Historic England also warmly welcomes part E to policy HC1 which promotes a proactive approach to heritage assets at risk so that their future maybe secured for this, and future generations of Londoners.

See our comments on the Good Growth policies where we have recommended strengthening to reflect the strategic importance of heritage to London.

We welcome the reference in para 7.1.1 which assists in joining up this policy with the Plan’s wider objectives under the Good Growth policies.

User: Historic England

As set out in our covering letter, we would like to see a reference in the Plan to the Mayor bringing forward a Heritage Strategy. This would be to support conservation of London's heritage and the delivery of heritage-led growth.

In para 7.1.3 we suggest reference to 'the highest standards of architecture' would suffice, given the potentially long life of the Plan. 'Modern' could also be confused with 'modernist'.

We recommend that a sentence is added to the end of para 7.1.1, as follows:

'... and their effective management is a fundamental component of achieving good growth. **The Mayor will bring forward a London-wide Heritage Strategy, together with Historic England and other partners, to support the capital's heritage and the delivery of heritage-led growth.**'

User:	Historic England

In para 7.1.3 we suggest reference to ‘the highest standards of architecture’ would suffice, given the potentially long life of the Plan. ‘Modern’ could also be confused with ‘modernist’.

We suggest the following minor changes:

- in para 7.1.3 refer to ‘... the highest standards **of architecture** ...’

User:	Historic England

In para 7.1.5 it would be appropriate to recognise the role of amenity societies amongst the stakeholders named in the final sentence.

- in para 7.1.5 amend to read '... as well as local communities **and amenity societies'**

User: Historic England

We support the reference in para 7.1.6 to urban renewal offering opportunities for creative re-use of heritage assets and the historic environment as well as enhancement, repair and beneficial re-use of heritage assets at risk. We also welcome 7.1.7 covering cases of deliberate neglect.

In para 7.1.7, for clarity, it would be suitable align the reference to significance more closely to the NPPF.

Lastly, we recommend amendment of the first sentence of para 7.17:

‘Heritage significance is **defined as the archaeological, architectural, artistic or historic interest** of a heritage asset. **This may be represented in many ways, in** an asset’s **visual attributes, such as** - form, materials, architectural detail, **design and setting, as well as through historic associations** and, where relevant ...’

User:	Historic England

Minor correction to the key: The full title of Westminster World Heritage Site is The Palace of Westminster, Westminster Abbey and St. Margaret's Church. For the map, we suggest just 'Westminster'.

Amend the key to: '... Royal Botanic Gardens, Kew; **Westminster**; Tower of London; and Maritime Greenwich'

User:	Historic England

Twice in the key ‘suburbs’ is spelt ‘surburbs’

Correct capitalisation and insert ‘Former’ for medieval market towns

Amend the spelling of ‘suburbs’

Square **M**ile

Former medieval market towns

User:	Mr Brian Levy

I object strongly to the London Plan proposed by the Mayor. It is presumptious of him to ga against national policy. In particular it would be wrong to weaken the protection of Conservation Areas and of Hampstead Heath.

User: South West London and St George's Mental Health NHS Trust

Part C of draft Policy HC1 (Heritage conservation and growth; page 268) says that:

“Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed. Development proposals should seek to avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.”

There are a number of issues with this proposed policy. First of all it is a ‘one size fits all’ test and does not distinguish between designated heritage assets (such as statutorily-listed buildings and conservation areas) and non-designated heritage assets (such as locally-listed buildings or buildings of townscape merit) despite there being separate and distinct tests in the 2012 NPPF for these two categories of assets.

Second, it requires the avoidance of harm whereas national policy recognises that harm can be acceptable in the wider balance; this is unduly restrictive and not consistent with national policy.

Third, it gives no indication of how different degrees of harm should be weighed in the overall balance, nor does it recognise the need for special regard to be paid to the effect of development on listed buildings in accordance with the Planning (Listed Buildings and Conservation Areas) Act 1990.
This policy should be drafted so that it reflects, and can be operated in accordance with, national policy and the aforementioned statutory instrument.

User: Hornsey & Wood Green Labour Party

The draft Plan gives insufficient consideration to the protection and enhancement of London's diverse local character. Policies D1 and and HC1 need to be amended to ensure that greater attention is given to the character map of London, and community or neighbourhood plans, in planning and designing new development. Proposed changes: The first sentence of Policy D1 'London's form and characteristics' should be amended to make specific reference to neighbourhood and community plans so that it reads 'Development Plans, area-based strategies, neighbourhood and community plans. and development proposals should address the following:' The phrase 'reflect and enhance local character and distinctiveness' should be added to the list after 1) in Policy D1A.

The first sentence of Policy HC1 'Heritage conservation and growth' should be revised so that it reads: 'Boroughs should, in consultation with Historic England, other relevant statutory organisations and local community and neighbourhood planning groups, develop evidence that demonstrates a clear understanding of London's historic environment, local character and distinctiveness.'

User:	Landsec
HC1: we welcome the recognition of the need to consider the benefits of development to economic viability, accessibility and environmental quality when preparing development strategies (Policy HC1).	

User: Redrow Homes London Division.

The draft London Plan sets out policy positions on heritage which differ from what is set out in the NPPF.
For example, Policy HC1 Heritage conservation and growth for instance supports ‘creative contextual architectural responses that contribute to their significance and sense of place’.

The use of ‘contribute’ in the quote alongside could be read as meaning ‘positively contribute’. If this is the intention then this approach is not consistent with the NPPF.
The draft London Plan must be set out so that it is consistent with national planning policy.

User: Mr Ken Pyne

This plan will certainly wreck the planning protection to Hampstead, The Heath as well as all conservation areas and their unique character.

Not only in Hampstead but all over London these plans will destroy many areas that make it such a wonderful city to live in and visit.

I will be legalized vandalism and a gift to exploitative overseas developers [As London already is as well as to home grown ones].

Over the years every overseas visitor I have ever met have remarked on our wonderful open spaces and conservation areas and how Londoners sensibly have fought to keep them –Hampstead Heath particularly as not only is it unique in London but it is also in the world.

What is the point of destroying what makes London great, worth living in and visiting?

User:	London Parks and Gardens Trust

The Trust notes the policies proposed for Heritage and Culture and supports Comment 7.1.7 about setting of historic places playing an important part in the heritage significance. The Trust also strongly welcomes Comment 7.1.8 and recommends that Local Authorities are encouraged to monitor this situation and use their powers of intervention (including compulsory purchase).

User: Sean Creighton

As a historian and member of the Croydon Local Studies Forum I welcome this policy is welcome as a strong reminder to Councils. In the consultation on the Croydon Local Plan (Partial Review) the Council did admit that it had not done enough to protect the historic environment. However, there is a difference between policy and decision making. The Croydon College building which adds to the attractiveness of the Town Centre is being demolished as part of the Councils' development of its Cultural Quarter. Heritage England decided that the quality of the architecture was not sufficient to warrant listing. While Ruskin House is a listed building its setting is being comprised by the housing scheme proposed on the green space next to it by the Council's Brick by Brick company.

User: Sainsburys Supermarkets Ltd

Policy HC1 C

We consider this policy statement to be too negative. In particular, where the policy states that development proposals should seek to “avoid harm”. While we understand the intention of the statement, it needs to be explicitly stated that this may not be possible in all circumstances and any potential harm should be weighed against the benefits of a scheme. This approach is in accordance with the more balanced approach of the NPPF.

Furthermore, too often a change in the setting of a heritage asset is immediately associated with harm. The policy should be clear that this is not the case and a balanced consideration of all relevant matters is required in accordance with the NPPF.

Given the need for more housing in London, the Mayor and the individual Boroughs should take a more positive approach towards development within or adjacent to historic environments. This will deliver fully optimised schemes but also respect the heritage of the wider area. The DLP should support this approach.

User:	Cross River Partnership

This Policy deserves full support in principle. However, it should be amended to reflect concerns that if Boroughs are responsible for implementation, it could require resources beyond those available in the current climate for public spending.

Policy HC1 should embrace a wider approach to local assets which includes Placemarks, not all of which will be heritage assets.

User:	Oneill Homer

HC1 Neighbourhood plans can identify local heritage assets and define local areas of character to balance with densification and encourage beneficial reuse.

User:	Public Health England

While we are supportive of proposals to boost the night-time economy, further consideration of how health will be considered in this process would be welcomed. HC1 B could be strengthened to: delivering positive benefits that sustain and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to health and social wellbeing.

User:	Wimbledon East Hillside Residents' Association

For Merton Specifically: We need any and all conservation areas, locally listed buildings and heritage assets to be coveted and protected, not destroyed or damaged beyond recognition.

User: L&Q

Heritage and the NPPF

The draft London Plan sets out policy positions on heritage which differ from what is set out in the NPPF. For example, Policy HC1 Heritage conservation and growth for instance supports ‘creative contextual architectural responses that contribute to their significance and sense of place’.

The use of ‘contribute’ in the quote alongside could be read as meaning ‘positively contribute’. If this is the intention then this approach is not consistent with the NPPF. The draft London Plan must be set out so that it is consistent with national planning policy.

User: Highams Park Planning Group

CHARACTER, DESIGN & PUBLIC REALM (CDP)

Development shall be of high-quality design and complement the existing styles of the Area, parts of which are covered by Conservation Areas and one Area of Special Character (Objective 6).

POLICY CDP1: Heritage Assets:

i. There shall be a presumption in favour of development that enhances and preserves Conservation Areas, Areas of Special Character and listed buildings (as listed on the Council's website from time to time).
ii. Development proposals within Conservation Areas or Areas of Special Character should respect the features and distinctive elements in respect of those areas and have regard to the Character Assessments within this Neighbourhood Plan.

Many parts of the Plan Area have a clear architectural heritage – with an attractive character and a distinct local identity. These positive features need to be protected and preserved. New developments in such areas need to fit in rather than stand out.

Development in the Plan Area over the past 140 years pre-dates the formal planning system and, therefore, styles and character in different parts of the Area are different in appearance. To guide developers as to how to comply with the Plan's policies regarding character and design, the Area has been subdivided into nine "character areas". The Plan requires that development within a character area must be consistent with the design principles summarised in the "character assessment" for that character area with the exception of Area 8 "Aldriche Way" where development should reflect the character of the residential development in Character Assessment Area 9. A map showing the Character Areas and the respective Character Assessments are contained in Appendix 3.

The character of the Area is largely dictated by the height of the existing buildings and the mature tree backdrop. Much of the Area consists of semi-detached or terraced housing that is normally two or three storeys high; blocks of flats that have been built since the 1950s are generally up to three storeys in height. Development higher than three storeys outside of HPDC is likely to result in damage to the character of the Area.

The Plan endorses the 12 criteria set out in the ‘Building for Life 12’ document - published in 2012 by Design Council CABE, Design for Homes and the Home Builders Association. This sets out “the industry standard, endorsed by Government, for well-designed homes and neighbourhoods that local communities, local authorities and developers are invited to use to stimulate conversations about creating good places to live”.

User: Kingston First

As a Royal Borough, Kingston benefits from a long history and a unique riverside setting. The town centre stands out from other Outer London centres because of this.

Kingston First supports the requirement of draft Policy HC1 for Local Planning Authorities and Developers to understand and utilise the heritage significance of a site or area, and the need to develop a long-term strategy in and amongst substantial listed buildings, scheduled ancient monuments and conservation areas. This is particularly important given the need for more intense forms of development.

User: Chartered Institute for Archaeologists

We welcome this opportunity to comment on the New London Plan which will guide the development of London for the near future. We support the aim of sustainable growth, and the contribution that our rich heritage can make to that. In particular we wish to broadly support the policies in Chapter 7: *Heritage and Culture* especially policy HC1: *Heritage Conservation and Growth.*

Archaeological resources are vulnerable to damage through development and land management, only a small proportion is formally designated, and much of their protection is based solely in the planning system. We are concerned that these protections are maintained in the face of the necessary growth of London. These undesignated historic assets, whether below ground remains or built structures, have the potential to inform planning policies, contribute to the creation of a sense of place, and engage and bolster communities old and new.

To this end, we recognise that Policy HC1 provides an overarching policy that should enable the management of archaeology and the broader historic environment throughout Greater London. The recognition of the role of the Greater London Historic Environment Record – a fundamental source for informed decision-making – is especially welcome. We also welcome the recognition that investigation must be undertaken by suitably-qualified individuals or organisations.

However, the historic environment can be read across the entirety of Greater London, and thus an appreciation and understanding of it, and it's value in informing the broader sweep of planning policies, should be recognised. In particular SD1 the Spatial Development Pattern could integrate archaeological strategies into Opportunity Area Frameworks.

The natural environment, landscape and parks are all created from land management and incorporate human activities over many centuries and are an archaeological as well as natural resource. The Green Infrastructure Plan G3 should demonstrate the wealth of historic environment incorporated in our green spaces and woodlands. A similar consideration should extend to policies for mineral extraction (SI10) and burial grounds (S7).

The city's industrial past is well-represented by canals, docks, river structures, former industrial and military sites, and infrastructure such as bridges, railway lines, and roadways. These can have aesthetic, engineering, and historic value, and policies to manage them should demonstrate awareness of their importance.

We would also like to see the broad context of the historic environment, our understanding of how peoples have shaped the city we see today, and the contribution that understanding can make to our appreciation of place to inform management of growth, read across all the supporting Strategies that supplement the London Plan.

User:	London Borough of Camden

The core principles for protecting heritage assets and their settings are in line with the National Planning Policy Framework. The greater recognition of non-designated heritage assets is welcomed.

The aspiration for securing the “highest standards of modern architecture” alongside the built heritage is also welcomed.

User: Camden Conservatives

HERITAGE CONSERVATION AND GROWTH: POLICY HC1

34. The Draft London Plan recognises the risk of cumulative harm to a heritage asset (such as a Conservation Area), resulting from individual planning applications (each
of which is judged to result in no harm, or to result in less than substantial harm which is outweighed by the public benefits of the proposals). However, it simply states that this risk should be "*actively managed*". This is a meaningless phrase. Policy HC1 should be amended to state as follows:
"*The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed, and taken into full account when harm to heritage assets is being assessed*"

User: Barts Health NHS Trust

Policy HC1 – Heritage Assets

Part C of draft Policy HC1 (Heritage conservation and growth; page 268) says that:

“Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed. Development proposals should seek to avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.”

There are a number of issues with this proposed policy. First of all it is a ‘one size fits all’ test and does not distinguish between designated heritage assets (such as statutorily-listed buildings and conservation areas) and non-designated heritage assets (such as locally-listed buildings or buildings of townscape merit) despite there being separate and distinct tests in the 2012 NPPF for these two categories of assets.

Second, it requires the avoidance of harm whereas national policy recognises that harm can be acceptable in the wider balance; this is unduly restrictive and not consistent with national policy.

Third, it gives no indication of how different degrees of harm should be weighed in the overall balance, nor does it recognise the need for special regard to be paid to the effect of development on listed buildings in accordance with the Planning (Listed Buildings and Conservation Areas) Act 1990.

This policy should be drafted so that it reflects, and can be operated in accordance with, national policy and the aforementioned statutory instrument.

User: Tavistock and Portman NHS Foundation Trust

Policy HC1 – Heritage Assets

Part C of draft Policy HC1 (Heritage conservation and growth; page 268) says that:

“Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed. Development proposals should seek to avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.”

There are a number of issues with this proposed policy. First of all it is a ‘one size fits all’ test and does not distinguish between designated heritage assets (such as statutorily-listed buildings and conservation areas) and non-designated heritage assets (such as locally-listed buildings or buildings of townscape merit) despite there being separate and distinct tests in the 2012 NPPF for these two categories of assets.

Second, it requires the avoidance of harm whereas national policy recognises that harm can be acceptable in the wider balance; this is unduly restrictive and not consistent with national policy.

Third, it gives no indication of how different degrees of harm should be weighed in the overall balance, nor does it recognise the need for special regard to be paid to the effect of development on listed buildings in accordance with the Planning (Listed Buildings and Conservation Areas) Act 1990.

This policy should be drafted so that it reflects, and can be operated in accordance with, national policy and the aforementioned statutory instrument.

User: Bengali East End Heritage Society

We oppose Tower Hamlet Council’s recent decision to replace the Bengali--?themed street lighting along Brick Lane because it undermines our cultural identity. Brick Lane is a cultural centre for the Bangladeshi community and the removal of these architectural features does not signal well for London as a leading global city. We want to see the following issues acted upon by elected representatives, local authorities and the GLA’s policy makers:

REINSTATE CULTURAL HERITAGE ASSETS: In 2016 the Kobi Nazrul Centre (located off Brick Lane) went through a re--?launch but since then nothing much has happened. We do not want to see Bengali cultural centres like the Kobi Nazrul Centre sold off to the highest bidder!

RETAIN CULTURALLY DISTINCT AREAS IN LONDON: Just as Brixton caters for the Afro--?Caribbean community, there’s Southall for the Indians and China Town for the Chinese diaspora, Brick Lane’s Banglatown is also a distinct area with strong Bangladeshi links that serves this community. We want to see this unique area of London actively safeguarded for the future British--?Bengali diaspora and others to feel proud to be part of an international city.

Brick Lane is also an important draw because of its many restaurants and we feel that recent actions by Tower Hamlets has undermined this: by removing culturally distinct features, the Council are failing to celebrate diversity and now adversely impacting on the local restaurants --? the lampposts along Brick Lane were part of the local character.

RECOGNISE ‘BANGLATOWN’: Provision should be put into place to recognise Banglatown as a cultural centre for Bangladeshis and the Bengali diaspora in the UK the largest diaspora outside of Bangladesh. Bangladeshis continue to make a huge contribution to the UK’s curry industry with 500k+ population paying taxes here into the UK economy.

English--?themed areas exist in other major cities like Hong Kong and Kolkata, so then why not retain a Bengali area in London?

SAFEGUARD PROVISIONS INSIDE THE NEW LONDON PLAN: The current London Plan (March 2016) clearly states that London should be a “city of diverse, strong, secure and accessible neighbourhoods” (point 1.53, page 32) with which people are “proud to identify” (7.4, page 283) and where “…the outcome should be places where people want to live and feel they belong…” (7.8, page 286) where “…people feel comfortable with their surroundings” (Policy 7.4: Local Character, Page 288) The latest actions by Tower Hamlets Council fail to meet the London Plan and recent developments have returned very little to the local Bangladeshi community.

We want Sadiq Khan’s new London Plan to adequately safeguard ethnic majority areas of London from any further destruction of their local heritage.

Don’t forget: ethnic minority communities contribute significantly to London’s economy!

WE, THE UNDERSIGNED WANT TO SEE A POSITIVE, LONG--?TERM AND INCLUSIVE LEGACY FOR SPITALFIELDS BANGLATOWN.

User:	Mrs Alona Sheridan

The first sentence of Policy HC1 ‘Heritage conservation and growth’ should be revised so that it reads: ‘**Boroughs should, in consultation with Historic England, other relevant statutory organisations and local community and neighbourhood planning groups, develop evidence that demonstrates a clear understanding of London’s historic environment, local character and distinctiveness.**’

User: Blanche Cameron

The draft Plan gives insufficient consideration to the protection and enhancement of London's diverse local character. Policies D1 and and HC1 need to be amended to ensure that greater attention is given to the character map of London, and community or neighbourhood plans, in planning and designing new development. **Proposed changes:** The first sentence of Policy D1 'London's form and characteristics' should be amended to make specific reference to neighbourhood and community plans so that it reads **'Development Plans, area-based strategies, neighbourhood and community plans. and development proposals should address the following:'** The phrase **'reflect and enhance local character and distinctiveness'** should be added to the list after 1) in Policy D1A.
The first sentence of Policy HC1 'Heritage conservation and growth' should be revised so that it reads: '**Boroughs should, in consultation with Historic England, other relevant statutory organisations and local community and neighbourhood planning groups, develop evidence that demonstrates a clear understanding of London's historic environment, local character and distinctiveness.**'

User: Mr Daniel Willis

f) Heritage without a community?

Community Links welcomes the Mayor's emphasis on the importance of heritage, culture and local identity in the new Plan. Our own headquarters at 105 Barking Road has a rich history as a site where key figures from the East End's labour movement, including Sylvia Pankhurst, Daisy Parsons and Will Thorne, made speeches in the late nineteenth and early twentieth century. The building has had previous lives as a theatre and town hall, but for almost 30 years has been home to Community Links' youth, employability and advice services. We are now working hard to further repurpose our home to be a digitally inclusive community hub for the 21st century and believe that the Mayor would be very interested to see the work we have also done in preserving, and enhancing, the building's rich heritage.

Nonetheless, we would like to reiterate our concerns to the Mayor about the prospect of our local community being displaced or disrupted by the housing and retail intensification projects envisioned in his new Plan. For over a century, 105 Barking Road has been a focal point for the local community in which low-income families have socialised, sought help and organised to amplify their collective voice. Since Community Links has been in residence, the building has also become a lighthouse for marginalised BAME communities seeking advice and support in troubled times. Over the past few years, the need for these services has increased greatly.

What would it mean for the history of our building, and for Newham's heritage, if local communities are displaced from their homes and support networks in the borough? What is the purpose of preserving the architectural heritage of 105 Barking Road, as a superficial façade of community, if the families who form the deep roots of our community are forced to leave the area? And how can the Mayor's strategy preserve the most diverse element of London's vast cultural heritage, its people, whilst redeveloping the space in which they live?

User:	Association of Directors of Public Health

In general in this section, ADPH London would like to see stronger wording to promote good health. We recommend strengthening HC1 B 4) to: **delivering positive benefits that sustain and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to health and social wellbeing.**

User: London national Park City Foundation

Heritage conservation and growth - Policy HC1, Pages 268 - 269

LNPCF supports Policy HC1:

7.1.1 London’s historic environment, represented in its built form, landscape heritage and archaeology, provides a depth of character that benefits the city’s economy, culture and quality of life. The built environment, combined with its historic landscapes, provides a unique sense of place, whilst layers of architectural history provide an environment that is of local, national and international value. London’s heritage assets and historic environment are irreplaceable and an essential part of what makes London a vibrant and successful city, and their effective management is a fundamental component of achieving good growth.

7.1.2 London’s diverse range of designated and non-designated heritage assets contributes to its status as a world-class city. Designated assets currently include four World Heritage Sites, over 1,000 conservation areas, 19,000 list entries for historic buildings, 150 registered parks and gardens, 160 scheduled monuments, and one battlefield. Non-designated assets cover an even wider range of features including buildings of local interest, most archaeological remains, canals, docks and waterways, historic hedgerows and ancient woodlands.

7.5.1 London’s rich cultural offer includes visual and performing arts, music, spectator sports, festivals and carnivals, pop-ups and street markets, and a diverse and innovative food scene, which is important for London’s cultural tourism. The capital’s cultural offer is often informed, supported and influenced by the work of the creative industries such as advertising, architecture, design, fashion, publishing, television, video games, radio and film. Cultural facilities and venues include premises for cultural production and consumption such as performing and visual arts studios, creative industries workspace, museums, theatres, cinemas, libraries, and music and other entertainment venues, including pubs and night clubs. Although primarily serving other functions, the public realm, parks, skate-parks and sports venues can provide important settings for a wide range of arts and cultural activities.

User:	Blackheath Society

There is, in comparison with the 2016 Plan, a general weakening of the protections afforded to heritage assets. It would be huge mistake to allow development pressures to overwhelm heritage assets and spaces which give London much of its value.

User:	Just Space

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

User:	National Grid

On heritage, we state that the identification of assets for understanding, conserving and enhancing the historic environment and heritage assets needs to be carefully considered and that buildings or structures are not unnecessarily statutorily protected (Policy HC1 Heritage Conservation and Culture).

User: Primrose Hill Conservation Area Advisory Committee

HC1 A Draft policy: ‘Boroughs should, in consultation with Historic England and other relevant statutory organisations, develop evidence that demonstrates a clear understanding of London’s historic environment.’

Our proposed amendments – reasoning: to achieve consistency with the Plan’s general aim of working collaboratively with stakeholders, including local communities, and to recognize the long-standing role, and value, of local and specialist expertise, including local and national amenity bodies.

Our proposed revised text: ‘Boroughs should, in consultation with Historic England and other relevant statutory organisations, local community groups, local and national amenity groups, and relevant expert groups, develop evidence that demonstrates a clear understanding of London’s historic environment.’

HC1 B 2) Draft policy: ‘utilising the heritage significance of a site or area in the planning and design process’

Our proposed amendments – reasoning: to achieve better consistency with legislation on conservation areas and Listed Buildings.

Our proposed revised text: ‘to preserve, enhance, and utilize the heritage significance of a site or area in the planning and design process’

HC1 C Draft policy: ‘… The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed. …’

Our proposed amendments – reasoning: We welcome this policy and the recognition of the importance of cumulative impacts. Failure to assess cumulative impacts is a serious weakness in current heritage management. We seek to make it more effective.

Our proposed revised text: ‘… The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed, and taken into full account when harm to heritage assets in being assessed in decision making on applications. …’

User: London Forum of Amenity and Civic Societies

In **Para 7.1.2** Add “railways” after “canals”.

In **paragraph 7.1.3** replace the word “from” in line seven with ‘by’ and replace the word “modern” by ‘contemporary’ and replace the word “bring” by ‘communicate and make clearly legible’

In **Paragraph 7.1.4** the first word ‘Many’ should be replaced by ‘Most’.

In **Paragraph 7.1.4** the words “sustain and enhance” should be changed to ‘preserve and enhance’. It should be noted that 'to preserve' was held by the Courts to mean 'to prevent from harm', but still encompasses beneficial change. Also change “boroughs’ character appraisals, conservation plans and local lists” to “boroughs’ character and context analyses, conservation area appraisals and related management plans, local heritage lists, designated heritage assets and Assets of Community Value” and add “and decisions.” at the end of the paragraph.

In **paragraph 7.1.4** there should be a cross-reference to paragraphs 3.2.2 to 3.2.4 in the design chapter, where character appraisals are encouraged, and the welcome idea of digital modelling is introduced. In the penultimate line of paragraph 7.1.4, the words “conservation plans” should be replaced by ‘Conservation Area Management Plans’.

In paragraph 7.1.5 Change “understanding of the heritage values of a site or area” to ‘understanding of the heritage values of a listed building, designate heritage asset or site or area’

In **paragraph 7.1.5 r**eplace ‘as well as local communities’ by ‘local historical and archaeological societies, as well as the wider local community’. This is important as societies often have members at least as expert as many professionals.

Policy 7.1.6 is supported but after “character of an area” should be put ‘The process of securing the adaptive re-use of existing buildings, which embody environmental capital and where environmental impacts have long since been discharged, is inherently sustainable.’ Note that as advocated by Lord Rogers in the Urban Task Force Report the historic environment - terraces, squares, crescents, town houses, mansion blocks etc.- provides a valuable template and design indicators for achieving intensification involving significantly higher densities than the norm, without sacrificing the attributes of civilised urban living. That is relevant to the policies of chapter 3.

Paragraph 7.1.6 should become an additional section within Policy HC1

Paragraph 7.1.7 would benefit from having the following words placed at the end of its first sentence “and between the historic asset and its broader context.”

Paragraph 7.1.8 should have the words “to help justify” deleted and replaced by “in relation to”. **This paragraph should be part of policy HC1 E**.

Paragraph 7.1.9 would benefit from reference to “industrial archaeology and palaeontological remains.” Also, it should recognise the fundamental role of Historic England’s Greater London Archaeological Advisory Service in all boroughs except Southwark and the City of London.

Figure 7.4 for the Outline Character Map of London is another one that is too small to be read easily. As recommended with the Key Diagram, there should be in a NLP appendix versions of the maps with overlapping quadrants, each printed larger and access to high definition versions of them in the GLA web site for viewing when zoomed.

In **paragraph 7.1.10 t**he first bullet point repeats the last sentence of paragraph 7.1.9.

The last bullet point of **paragraph 7.1.10** is not one - it should be a new line in the paragraph.

In **paragraph** 7.2.4 for consistency it should be ‘Tower of London WHS’, not ‘The Tower WHS’ after the words “Tower Hamlets”. The paragraph should require Councils to include policies in their Local Plan policies to ensure that applications which adversely impact World Heritage Sites are refused . The Mayor should underwrite this requirement by indicating in this plan that he will refuse such applications.

Figure 7.5 - **Archaeological Priority Areas and Registered Battlefield**

Consideration should be given to including in Figure 7.5 the Brentford and Turnham Green Battlefield of a conflict in the Civil War - see http://bit.ly/2HFR3Hh

User: Regent's Park Conservation Areas Advisory Committees

Chapter 7 Heritage and culture

We broadly welcome these policies, and seek to enhance their effectiveness for the benefit of all communities.

HC1 A Draft policy: 'Boroughs should, in consultation with Historic England and other relevant statutory organisations, develop evidence that demonstrates a clear understanding of London's historic environment.'

Our proposed amendments – reasoning: to achieve consistency with the Plan's general aim of working collaboratively with stakeholders, including local communities, and to recognize the long-standing role, and value, of local and specialist expertise, including local and national amenity bodies.

Our proposed revised text: 'Boroughs should, in consultation with Historic England and other relevant statutory organisations, local community groups, local and national amenity groups, and relevant expert groups, develop evidence that demonstrates a clear understanding of London's historic environment.'

HC1 B 2) Draft policy: 'utilising the heritage significance of a site or area in the planning and design process'

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HC1 C Draft policy: '… The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed. …'

Our proposed amendments – reasoning: We welcome this policy and the recognition of the importance of cumulative impacts. Failure to assess cumulative impacts is a serious weakness in current heritage management. We seek to make it more effective.

Our proposed revised text: '… The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed, and taken into full account when harm to heritage assets in being assessed in decision making on applications. …'

Policy HC2 World Heritage Sites

User:	Mrs Hilary Pereira

The fact that the 4 world heritage sites in London are all on the Thames helps demonstrate the importance of the river internationally

User:	Mrs Hilary Pereira

The landscape and especially the riverscape are at least as important as the built environment to these sites. Kew Gardens is also the start of the Arcadian landscape on the Thames

User:	London Forum of Amenity and Civic Societies

Policy HC2 has content that is well directed and which covers the subject matter in an exemplary fashion, as did the current London Planpolicies: the problem arises over their implementation. The policy has been ignored by boroughs and the GLA and that has led to critical comments by UNESCO's World Heritage Site Committee and ICOMOS about harm to the setting of the WHS of the Palace of Westminster. It should be stated in Policy HC2 that the Mayor will intervene when proposals are submitted that are contrary to policies in this chapter.

User: Royal Botanic Gardens, Kew

As a UNESCO World Heritage Site (WHS) we are glad to see specific consideration laid out for sites such as ours in the London Plan. Overall, we support and endorse the statements and intentions laid out in this section, however we note that much of it reflects what already exists in planning law and previous guidelines.

The main risk to Kew's Outstanding Universal Value (OUV) inscribed in Kew's designation as a World Heritage Site is inappropriate redevelopment of Brentford (in the neighbouring Borough of Hounslow), and in particular the large scale high rise developments which can be seen from Kew Gardens and the Buffer Zone. Other key attributes contributing to our Outstanding Universal Value as a World Heritage Site are at risk; the diverse historic landscape and relationship with the River Thames, and wider Arcadian landscape beyond. Key historic vistas like the Syon House vista should remain uninterrupted by modern and insensitive development.

HC2A

We strongly support the recommendation that Boroughs containing a UNESCO World Heritage Site and their neighbours work together to conserve and protect their Outstanding Universal Value. We believe this cross Borough cooperation should be emphasised in other policy areas relating to World Heritage Sites.

HC2C

We welcome this policy and recommend that developers who are producing Heritage Impact Assessments should consult World Heritage Site management authorities in developing their assessments and planners should ensure World Heritage Site management authorities are invited to comment on those assessments before planning decisions are taken.

HC2D

We agree that up-to-date World Heritage Site Management Plans should be used to inform the plan-making process, and when considering planning applications, appropriate weight should be given to implementing the provisions of the World Heritage Site Management Plan.

A new World Heritage Site Management Plan for Kew is being produced (current version 2014). One of its key features will be more planning guidance and tools to assist both the developers and local planning offices as they undertake their Heritage Impact Assessment. The new WHS Management Plan will put in place measures to improve communication with local councils/planners and their understanding of Kew's Outstanding Universal Value (OUV). Developing initiatives such as 3D mapping of the London landscape will also aid in parties' understanding of the development and evolution of the London landscape, as well as the potential impact on views and backdrops to important buildings and structures. This type of technology is already being deployed to bring to life some of the UK's most dramatic landscapes as 3D mapping software by Ordnance Survey (OS) is being used to plot walks through the UK countryside.

User:	National Trust London

Policy HC2 World Heritage Sites, **Policy HC5 Supporting London's culture and creative industries**, **Policy HC6 Supporting the night-time economy**, and **Policy HC7 Protecting public houses** are all welcomed and supported by the National Trust in London. They are especially noted for the breadth of heritage they seek to preserve and promote, fostering a more inclusive understanding of heritage that reflects the diversity of Londoners (7.5.4) (7.6.11) (7.7.2).

User:	Confederation of Passenger Transport

Recognition of London’s world heritage sites is welcome and as treasures which should be accessible to the greatest number of people, and from the widest range of cultural and economic backgrounds, we would encourage protections which ensure that they are able to reach these using the most practical and economic means. Coaches provide practical and economic transport for countless thousands of visitors to these and other London attractions every day and we would urge wider recognition of this and stronger safeguards which allow the full benefits to be retained and developed.

User: Kew Society

We support the aim to embed heritage, including archaeological sites, in planning and welcome the emphasis given to the role for Historic England.

The protection of the setting of the World Heritage site of the Royal Botanic Gardens in Kew is of particular importance to us and has been under threat from regenerative change in Hounslow. We support the regeneration of areas in Hounslow but greater sensitivity to the impact on the historic vistas from Kew and other historic assets in Hounslow needs more emphasis as well as the protection of the relationship of the Royal Botanic Gardens to the River Thames and the Arcadian landscape.

Proposals for high rise building such as the Chiswick Curve, turned down by Hounslow Council but now in appeal, should never be countenanced. Nor should other high and medium rise developments be approved, as has happened in recent years with, for example, approval of high rise enabling developments associated with the relocation and redevelopment of Brentford Football stadium and, more recently the Watermans Arts Centre on the river front.

Specific reference should be included in the new London Plan to the need to fully protect the Royal Botanic Gardens' Outstanding Universal Values (OUVs) as a World Heritage Site: http://whc.unesco.org/en/guidelines/.

Councils should be required to take full account of the Royal Botanic Gardens new World Heritage Management Plan, currently being drafted, in their Heritage Impact Assessments. The Buffer Zone to the North of the site should also be extended in order to protect this World Heritage asset. Insufficient attention to the OUVs puts at risk the World Heritage status of this major London tourist attraction.

On the references in this Chapter to the night time economy, we agree it is not suitable everywhere – it can radically alter the nature of communities and needs to be carefully considered with decisions taken locally by Boroughs.

User:	London Borough of Lewisham

HC2 provides a more detailed policy on World Heritage Buffer Zones and places additional requirements on London Boroughs including neighbouring boroughs being part of the World Heritage Site Steering Groups and the requirement for Heritage Impact Assessments where development proposals have the potential to harm World Heritage Site.

User:	London Borough of Tower Hamlets

This policy is broadly supported as it provides more support for identifying local views which we have done through the Regulation 19 draft Local Plan

User:	London Borough of Hounslow

While LB Hounslow supports the overall approach in policy HC2, it is challenging to reconcile the significant uplift in housing and employment set out in the Great West Corridor Opportunity Area with greater emphasis on buffer zones and views than before. It is considered a specific World Heritage Policy should now be devised.

User:	Alison Hatt

Tall buildings such as The Shard are out of proportion to its surroundings; too many commercial buildings in the city have spoiled the sky-line (Policy HC4) and are in danger of impinging on the World Heritage Site (Policy HC2) of the Tower of London to its detriment.

User: Westminster City Council

The draft policy does not go far enough in protecting World Heritage Sites in accordance with the findings of the report of 2017 Joint ICOMOC/ICCROM Reactive Monitoring Mission (http://whc.unesco.org/en/list/426/documents). This is a genuinely strategic issue of cross-borough importance.

It should make clear that any balancing between the protection of Outstanding Universal Value and the other benefits of development projects is more strongly weighted in favour of Outstanding Universal Value. Given cross-borough impacts of development proposals, it should also be clearer on the Mayor's strategic role on this matter. Currently paragraph 7.2.1 appears to absolve the GLA of any responsibility in this regard, and gives insufficient emphasis to the need for cross-borough working.

Paragraph 7.2.4 should also be amended to clarify that there is potential for impacts on World Heritage Sites from boroughs other than those set out here (particularly those with Opportunity Areas). In particular, the London Borough of Camden appears to be a significant omission given the potential impact of tall buildings in the Tottenham Court Road Opportunity Area on the Westminster World Heritage Site. Rather than seeking to set out an exhaustive list of boroughs that should consider having policies in the text (which will inevitably be incomplete) a better approach might be to include a requirement in policy that all boroughs should consider whether it would be appropriate to have policies in their local plans regarding potential impact on WHSs.

User:	London Borough of Southwark

The policy is broadly supported by the council but it is considered the policy lacks clarity. The policy gives no sense of assessment of the views – i.e. what development would be considered acceptable and what development would be unacceptable?

User:	London Borough of Wandsworth

Wandsworth is partner borough in managing the Westminster World Heritage Site. Policy HC 2 is supported. However, reference could be made to the use of 3D modelling to support protection of views which is set out in Policy D2 C and discussed in paragraph 7.2.3. The use of 3D modelling was a Recommendation No. 13 of the UNESCO mission report 2017.

User:	London Borough of Richmond Upon Thames

Richmond is partner borough in managing the Westminster World Heritage Site. Policy HC 2 is supported however, reference could be made to thee of 3D modelling to support protection of views which is set out in Policy D2 C and discussed in paragraph 7.2.3. The use of 3D modelling was a Recommendation No. 13 of the UNESCO mission report 2017.

User:	Royal Borough of Greenwich

Support the strengthened protection for World Heritage Sites and their setting provided by this policy. Agree that it is appropriate that additional views beyond those identified in the London View Management Framework are set out in the relevant WHS Management Plan and considered as part of plan development and decision-taking.

User: Just Space

Policy HC 2 World Heritage Sites

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

User:	London Borough of Bexley

Part A of **Policy HC2 World Heritage Sites** requires London boroughs that neighbour boroughs with World Heritage Sites to include policies in their Development Plans that ensure that development proposals do not have an adverse impact on the World Heritage Site, including views. Bexley adjoins Royal Greenwich, which contains the Maritime Greenwich World Heritage Site. Although Bexley borders Royal Greenwich, it is approximately 9km from the World Heritage Site to the borough boundary. Topography, including a rise in the land level and the curves of the River Thames, break off any visual relationship between the site and Bexley The explanatory text in **Paragraph 7.2.4** lists those boroughs that should include policies in their Local Plans to protect World Heritage Sites, and Bexley is not included in this list. Therefore, the Council seeks clarification on whether there is any obligation for Bexley under **Policy HC2(A)**.

User: British Property Federation

We are encouraged that the Mayor recognises the vital role that heritage can play in contributing to the capital's ability to grow. In addition, the approach of considering heritage and culture together in one single chapter with the emphasis on their clear links and ability increase the economic, environmental and social value of London is welcome.

BPF members place significant value on the historic environment. Maintaining historic buildings in economic use, introducing new uses for heritage assets and integrating historic buildings within newer schemes all present opportunities for conservation and enhancement, together with new development, to work together and transform the built environment and public realm for communities.

User:	London Wildlife Trust

We support Policy HC2 in principle and welcome the inclusion of setting and buffer zones.

User:	London Wildlife Trust

We welcome in para 7.1.2 the fact that historic hedgerows and ancient woodland included in the list of heritage assets, and recommend that veteran and ancient trees are added.

User:	London Wildlife Trust

We would recommend that specific reference is made (perhaps within paras 7.2.1.-6) to Darwin’s Landscape Laboratory (DLL) which is still a candidate WHS application, and would hope that provision for the appropriate protection of this heritage landscape are considered by the Mayor in the longer term.

User:	HB Reavis UK Limited

HB Reavis recognises that the protection of World Heritage Sites (WHS) and their settings is an important objective of the Plan, however we believe that in accordance with the approach advocated within NPPF, policy HC2 should reflect the need for development with the potential to affect a WHS or its setting to be considered against any public benefits that would be delivered by the development proposal. London as a World City faces development pressures that require the protection of its heritage alongside continuing modern development, and where there is an opportunity for new development of outstanding quality to deliver significant public benefits, particularly where those benefits can only be delivered on very specific sites, such opportunities must be taken.

User:	West London River Group

All four World Heritage sites are on the River Thames, which forms part of the sites unique setting and helps demonstrate the importance of the river internationally. It is essential that this setting is protected and due consideration is given to D8 and HC4. Collaboration across boroughs is essential. Where such collaboration is not possible and where a development is potentially detrimental to the integrity of the site and its setting it should be referred to the Mayor’s office.

User:	West London River Group
This just mentions the built environment. The River Thames and in the case of Kew Gardens the Arcadian landscape should be included.	

User: Historic Royal Palaces

We are encouraged to see that the chapter on Heritage and Culture includes a specific policy (HC2) on the conservation, promotion and active protect ion of the London WHS, with supporting text in paragraphs 7.2.1- 7.2.6, which helpfully amplify the guidance given in previous plans. Historic Royal Palaces strongly supports this important policy, which provides a more robust approach to the protection of the OUV of London's W HS. It also reflects recommendations made in the ICOMOS/ ICCRO M report following the recent UNESCO Reactive Monitoring Mission to London (to the Westminster WHS) in Febr uary 2017.

Reference is made in both this policy and its supporting text to the Outstanding Universal Value (OUV) of WHS, the 'attributes' that convey that OUV and their 'authenticity' and 'integrity'. These terms are not in daily use within the UK planning system and may be unfamiliar to many reading the Plan. Whilst OUV is largely self-explanatory (and is included in the Plan's Glossary) , the other terms are not and definitions in the Glossary, or a reference to where such definitions can be found easily, should be included.

Paragraph 7.2.5 points to the current versions of the WHS Management Plans for a description of each site's attributes, which the Tower of London WHS Management Plan 2016 certainly includes, but more accessible definitions would be helpful.

We strongly support the recommendation in paragraph 7.2.3 that views additional to those identified in the *London View Management Framework* (LVMF) may be required in order to consider the attributes that contribute to a site's OUV, particular the significance of its setting. The Tower of London WHS Management Plan 2008 had as one of its objective t he preparation of an assessment of the Tower's local setting, including key local views of and from the Tower and this resulted in the publication of the *Tower of London Local Setting Study* 2010. The study has been of great help to Historic Royal Palaces, the local planning authorities and developers is assessing the potential impact of proposed development adjacent to the WHS.

We welcome the Mayor's expression of support in paragraph 7.2.6 for steering groups that assist with the management of W HS and the implementation of WHS Management Plans. The Tower of London W HS Consultative Committee has been in existence for some time and the GLA's contribution to the group is valued.

User:	Landscape Institute London

LI London supports the proposals and policies in the heritage sections of this chapter (7.0 - 7.4.1 and policies HC1-4) which are well considered and provide clear policy guidance.

User:	Natural England
We welcome the inclusion of setting and buffer zones for world heritage sites.	

User: Historic England

Historic England strongly supports this important policy. It provides a more robust approach to protection of the Outstanding Universal Value (OUV) of London's four World Heritage Sites, and reflects recommendations in the ICOMOS/ICCROM report following the Reactive Monitoring Mission to Westminster in February 2017. This report provides an important part of the evidence base for the new London Plan.

Historic England wishes to see this stronger approach applied to the Opportunity Area policies and OAPFs, existing and forthcoming, where there are potential impacts on the settings of World Heritage Sites.

Please note our comments and recommendations in relation to policy SD1 and the Opportunity Areas where development in these has potential to harm the Outstanding Universal Value of World Heritage Sites.

User:	Historic England

In para 7.21, for clarity, we recommend that the GLA is identified at the end of paragraph.

We recommend minor changes:

- in para 7.21, amend to read ‘This duty is transferred to local authorities, **including the GLA’**

User:	Historic England

In para 7.2.3, second sentence, we suggest a minor change to recognise that change may also be neutral.

We welcome the reference to 3-D modelling in para 7.2.3 and to Historic England being represented on World Heritage Site Steering Groups in para 7.2.5.

We recommend minor changes:

in para 7.2.3, amend the second sentence to read ‘Changes to the setting can have **an adverse, neutral** or beneficial impact on the ability ...’

User: Maritime Greenwich World Heritage Site

Paragraph 7.2.1

We agree that, in ratifying the (1972) World Heritage Convention, the UK Government has made a commitment to conserving and enhancing World Heritage Sites‘ Outstanding Universal Value. Our view is that this is an ongoing commitment of the State Party (led for Government by the Department for Digital, Culture, Media and Sport (DCMS). Clearly, meeting the UK’s obligations relating to World Heritage Sites under the Convention, is a shared responsibility including that of World Heritage Site Partnerships and relevant Local Authorities. However, we are not aware of any formal transfer of this responsibility to Local authorities and consider that the final sentence of paragraph 7.2.1 should be clarified.

User:	Maritime Greenwich World Heritage Site

In relation to Maritime Greenwich, we recommend an amendment to the text as follows:

"……It is expected that the following boroughs should contain such policies……Royal Borough of Greenwich, London Borough of Tower Hamlets and London Borough Lewisham (Maritime Greenwich WHS)……."

User: Maritime Greenwich World Heritage Site

Paragraph 7.2.6

We note and applaud the Mayor's commitment to supporting steering groups in managing World Heritage Sites and actively engaging with stakeholders in implementing Management Plans. However, we believe that there is an opportunity for the Mayor's office to take a more proactive role in coordinating and addressing key issues appertaining to all four of London's World Heritage Sites, in particular: facilitating the implementation of London-wide policies relating to World Heritage Sites; the promotion of London's World Heritage Sites as a critical mass and important assets of the capital; addressing the relentless march of tall buildings; and the impact of wider development and changing environments on the settings of London's World Heritage Sites. We would welcome consideration of such an initiative and reference to it in the draft new London Plan.

User: The Royal Parks

HC1 Heritage conservation and growth

Inappropriate development can significantly dilute the look and feel of heritage assets and undermine their value to the public. Any policy which effectively addresses this is supported by TRP.

HC2 World Heritage Sites

TRP supports this proposal. It is pleased that the Plan advocates that development proposals in buffer zones to WHS should conserve, promote and enhance the value of the site.

HC3 Strategic and local views, HC4 London View Management Framework

TRP strongly supports the protection and enhancement of existing strategic views (some of which have been undermined in recent years by inappropriate developments), and the creation of new protected views.

Policy HC3 Strategic and Local Views

User:	City of London Corporation

This policy carries forward existing London Plan policy on strategic and local views and provides the policy framework for the Mayor’s London Views Management Framework SPG. The City Corporation supports this policy, but considers that it could be improved by outlining the importance of collaborative working between boroughs in assessing the implications of development proposals on strategic and local views, particularly collaboration between the development host borough and the borough within which the protected landmark is located.

User:	Wandle Valley Forum

We support Policy HC3 identifying the importance of strategic and local views. Wandle Valley Forum is supporting a significant original research project being undertaken as part of the Living Wandle Landscape Partnership to identify and protect key vistas throughout the Wandle Valley. This will be published in 2018. We ask that the London Plan recognises and supports these vistas which stretch across Borough boundaries. They should be identified in local and neighbourhood plans.

User:	Canary Wharf Group

We note that part E of draft policy HC3 makes reference to a review of the London ViewManagement Framework (LVMF). There are a number of references elsewhere in thedraft London Plan to using digital technology and 3D models (draft policies D2 and D8)to support design analysis. We believe that given the pace of change in London, thesetechnologies are also important to inform an LVMF review and draft policy HC3 shouldmake specific reference to their use in the review of the LVMF.

User:	London Borough of Haringey

Haringey agrees that important local views require protection, and development within them must be dealt with sensitively (as outlined in Policy HC4 London View Management Framework).

User:	London Borough of Lewisham

HC3 is supported as it allows tall buildings to be considered strategically, rather than just wherever they are proposed.

There are a number of areas in the borough that provide amazing views, e.g. Blythe Hill Fields but there will be an additional requirement for London Boroughs to identify local views. How will this effectively be used to refuse development which negatively effects identified views?

User:	London Borough of Brent
The Council supports this policy.	

User: London Borough of Bromley

The introduction of clause G of the policy is welcomed as it provides clarification regarding the principles which should be used to designate and manage local views and supports the approach taken by the Council in its Draft Local Plan Skyline Policy 48 which makes references to these principles for the management of local views vistas gaps and skyline having regards to the impact of development in the foreground, middle ground and background of these views.

Some of Bromley's Views of Local Importance reach out to include parts of Lewisham and Bexley Councils. Similarly, a local view starting in Croydon from Addington Hill goes through a wide stretch of the London Borough of Bromley. The Council will continue to work with these Boroughs with regards to the continued management and identifications of local views across boundaries where appropriate.

User: Old Bermondsey Village Neighbourhood Forum

Aside from a marked reduction in the importance given to neighbourhood planning, our overarching criticism is that there is no clear instrument that checks development targets demanded of local authorities (especially in Opportunity Areas) by policies GG2, H1, H2, D6 and D8 against the importance of the preservation and enhancement of the social and built fabric of London highlighted in policies H5, H6 HC1, HC3, HC5, and HC7.

We think there is a need to balance the opportunities offered to local authorities in the DLP by way of identifying, protecting and nurturing the distinct identity of areas as the basis for sustainable development versus the potential abuse of these opportunities by planning departments – in particular where potential exists for opportunity areas, site allocations and cultural quarters to become used as guises for insensitive profit driven high-rise and monouse (housing dominated) development.
Neighbourhood Forums should be empowered to have a better part to play in this by the DLP.

The New Southwark Plan for example has just completed formal consultation ignoring widespread calls for a borough wide local list. It contains deeply unsound Area Visions and Site Allocation Policies that ignore local consultation and make no reference to key guidance like Historic England's Advice Note 3 for example.

User:	London Borough of Tower Hamlets

We are broadly supportive of this policy as it provides more support for identifying local views. However, it would be very useful to make clear in the London Plan:
- criteria why views and landmarks should be protected
- what are objectives of protection
- what a development is expected to consider in order to address designation.

User:	Royal Borough of Kingston

Support including the importance of strategic views and recognition of the importance of local views. In this regard, policies HC3 and HC4 closely relate to, and support, Kingston’s Local Views Study which will be used for both decision making and plan making processes. Whilst RBK agrees that, as per policy HC3(G) , the principles of the London View Management Framework policy is relevant to local views, it would be useful if this was also stated in either the policy or accompanying text for HC4 to provide clarity and to ensure that the importance of local views is taken into account in development proposals.

User:	London Borough of Hackney

Paras F and G introduce the idea of Local Views in boroughs.

This is a new policy and is welcomed.

User:	London Borough of Hounslow
LB Hounslow supports this policy	

User:	Westminster City Council

The identification of local views and the nature of the protection given to them are matters for the borough(s) concerned and are not for the Mayor to seek to prescribe. We would suggest deletion of criterion G and paragraph 7.3.6.

Any discussions between the Mayor and landowners of the kind suggested in paragraph 7.3.5 must involve the borough concerned.

User: London Borough of Southwark

The policy supports the designation of Southwark's new local views, as set out in the New Southwark Plan.

The council recommends the Mayor use the opportunity of the new London Plan to designate new Strategic Views where they are proven to offer unique views of Strategically-Important Landmarks that make a very significant contribution to the image of London at the strategic level.

South London has few existing designated Strategic Views in comparison to the array of views of Strategically-Important Landmarks from viewpoints across north London. The preparation of a new London Plan offers the opportunity to address this anomaly and consider the designation of proven, new Strategic Views from South London, and specifically Southwark.

The proposed New Southwark Plan borough views of St Paul's Cathedral from One Tree Hill and Nunhead Cemetery are worthy of Strategic View designation through the new London Plan as they offer unique viewing perspectives and experiences of St Paul's Cathedral from publically accessible points. The view from Nunhead Cemetery is particularly unique.

The designation of these two views in the New London Plan would acknowledge and safeguard the unique viewing experience of St Paul's Cathedral, that is comparable if not better, than existing designated views of the Cathedral from the North; and recognise Southwark's strategically important location as part of central London.

The council welcomes the opportunity to work with the Mayor to explore the designation of these views and have prepared a robust evidence base to support this.

Although borough collaboration is suggested in Policy HC3.G where adjoining boroughs facilitate an important view from one borough through another, it should be recognised that if agreement is not reached between boroughs, important views may not be able to be protected. As such the Mayor should consider these views for Strategic View designation if they meet the required thresholds.

The identification and protection of Protected Silhouettes of Tower of London and its OUV is suggested in HC3.D. A Protected Silhouette could potentially be a constraint to the delivery of new tall buildings at London Bridge if, for example, a silhouette in a view from the north east of the Tower (e.g. from Royal Mint towards the Tower) is protected. It should be noted that this is a key area of growth in London Bridge Opportunity Area.

An update to the LVMF SPG is suggested in Policy HC3.E. The council has concerns over the potential extension of background assessment area of Strategic Views, if they limit the development potential of Old Kent Road Opportunity Area. The council welcomes the opportunity to be part of further discussions regarding this.

User: The Northbank BID

Policy D7: Public Ream, D10: Safety, security & resilience to emergency

We support policies D7 and would like include the needs of future technology, area management to reduce crime and antisocial behaviour. Area resilience is a high priority for Northbank area to ensure businesses and people are safe.

- Funding
- Working with Boroughs and BID as driver for public realm enhancements
- Public realm design that encourages sustainable choices and behaviour change

D7: The River Thames
It would also be beneficial for the management of the River Thames and the Thames walkways, if their role in the public realm was acknowledged here. Although the statement in para 9.14.8 (p 367), that the River Thames should not be designated as Metropolitan Open Land, is welcome and this should remain the position, a statement here about the role of the River Thames would be appropriate.
The River Thames is the defining landscape, historic and natural feature of London. We believe it should feature more strongly in London Plan policies and that more emphasis is given to addressing routes along it and the positive economic, social and environmental contribution it makes. The London Plan has a particularly important role in providing a coherent approach given the Thames passes through so many boroughs.

We welcome that “use and enjoyment” of the Thames is identified as a strategic function of the Central Activities Zone and some protection afforded the Thames from tall buildings in Policy D8 and in strategic views (Policy HC3). Policy SI14 is especially welcome in encouraging the identification of Thames Policy Areas. We recommend that Policy D7 is amended explicitly to recognise the importance of the public realm provided by and along the Thames, including specific reference to the need for expansive, continuous public access to the riverfront. The River’s potential in terms of freight movements should also be recognised and supported at appropriate points in this draft London Plan.

User:	London Borough of Richmond Upon Thames

Policy HC 3 is supported including a review of the London View Management Framework in HC 3 E. Wandsworth has identified important Local Views in its adopted Local Views SPD.

User:	London Borough of Richmond Upon Thames

Policy HC 3 is supported including a review of the London View Management Framework in

HC 3 E.

User:	London Borough of Harrow

Harrow agrees that important local views require protection, and development within them must be dealt with sensitively (as outlined in Policy HC4 London View Management Framework). In identifying important local views within Local Plans and managing these (applying the principles of Policy HC4 London View Management Framework), boroughs should be given the flexibility to balance the significance of the views and the implication of these against other planning considerations, such as the suitability of an area for more intensive development / tall buildings.

User:	London Borough of Havering

Havering supports this policy as the borough has a number of key views that should be protected e.g. the view from Havering Ridge down towards Romford, the rest of the Borough and across the Thames.

User:	London Borough of Enfield

Policies HC3 ‘Strategic and Local Views’ and HC4 ‘London View Management Framework’ need to make clear that some Outer London views stretch beyond the extent of London boroughs into neighbouring districts, and that measures to protect views should be considered as part of the duty to cooperate.

User:	Mama Ujuaje

Recommended wording:

From HC3: G
Boroughs should clearly identify important local views in their Local Plans and strategies. Green space views and Waterways should be considered an important aspect of what a Borough plan considers an important local view. Boroughs are advised to use the principles of Policy HC4 London View Management Framework for the designation and management of local views. Where a local view crosses borough boundaries, the relevant boroughs should work collaboratively to designate and manage the view.

User: Berkeley Group

8. HERITAGE AND CULTURE

8.1. London's heritage and culture are important to making it an attractive place in which to live, work and visit. It is important that it is appropriately protected, whilst ensuring the new homes, employment floorspace and other development that is needed is delivered.

8.2. London's strategic views have been designated, and are protected, reflecting their strategic importance to the capital and its heritage. Their designation, and review, is subject to rigorous testing and scrutiny given their strategic importance and the implications of their designation. It is not appropriate to apply the same strength of protection to local views as it is to the strategic London views. It is appropriate that there is a hierarchy of views afforded different levels of protection.

Policy HC3 Strategic and Local Views
Boroughs should clearly identify important local views in their Local Plans and strategies. Boroughs are advised to use appropriate ~~the~~ principles ~~of Policy HC4 London View Management Framework~~ for the designation and management of local views. Where a local view crosses borough boundaries, the relevant boroughs should work collaboratively to designate and manage the view.

User:	Pilbrow & Partners
Suggest additional London Panorama views from South London viewpoints from Horniman Gardens (Southwark) and Gypsy Hill (Lambeth)	

User: Redington Frognal Neighbourhood Forum

The following additional townscape views should be added to the list of those protected in table 7.1 (page 783):

3.1 the panorama of the Heath extension seen from Sunshine Corner

3.2 the panorama of Hampstead Garden suburb from the upper Heath Extension

3.3 the 180° panorama from the arcade of the Golders Green Crematorium with its unbroken tree line and the view northwards fromthe gardens

3.4 The planned view from the western end of the pergola and terrace of the Hill Garden towards the valley of the river Brent

3.5 The view from Golders Hill Park bandstand to Harrow-on-the-Hill

3.6 The view from Spaniards Road across the Vale of Health to the City.

User: British Property Federation

We are encouraged that the Mayor recognises the vital role that heritage can play in contributing to the capital's ability to grow. In addition, the approach of considering heritage and culture together in one single chapter with the emphasis on their clear links and ability increase the economic, environmental and social value of London is welcome.

BPF members place significant value on the historic environment. Maintaining historic buildings in economic use, introducing new uses for heritage assets and integrating historic buildings within newer schemes all present opportunities for conservation and enhancement, together with new development, to work together and transform the built environment and public realm for communities.

User:	Hammersmith and Fulham Historic Buildings Group

Policy HC 3 Strategic and local views

HC3 Table 7.1
We would suggest the views of Hammersmith Bridge with the riverside frontage of Hammersmith Mall and Terrace be included with River Prospects.

User:	London Wildlife Trust

We welcome and support Policy HC3.

User:	Silvertown Homes

Paragraph 7.4.6 states that ‘local views should be given the same degree of protection as Strategic Views’.

It is self-evident that they should not. If these local views were of the same overall importance then they would be defined in the London Plan as ‘Strategic Views’.

User: London Property Alliance

Policy HC3(G) encourages Boroughs to continue to designate “important local views” in their local plans. The Alliance recognises that there is a continuing role for locally-designated views.

However, paragraph 7.3.6 states that “Local views should be given the same degree of importance as Strategic Views.” This is entirely inappropriate and the Plan should provide for a hierarchy of importance, recognising that London’s most important and distinctive views are subject to a very high level of protection within the London View Management Framework. It would not be appropriate to extend the same level of protection to all locally designated views; this could very significantly affect London’s capacity to grow. In practice, the sensitivity of the Local Views will vary from view to view, as will each view’s resultant sensitivity and capacity to accommodate change.

The final sentence of paragraph 7.3.6 should be deleted.

User:	West London River Group
Consideration should be given to the view upriver from Richmond Hill as a river prospect.	

User: Camden Town Conservation Area Advisory Committee

General: We very much welcome the Mayor's recognition of Townscape Views in addition to the longer established Strategic Views. We welcome the listing of these views in the draft Plan (Table 7.1). We seek to add to these listed Townscape Views.

Our proposed amendments – reasoning: We propose additions to the list of Townscape Views in Table 7.1. Our additions seek to demonstrate greater inclusivity and respect for local communities, and greater recognition of distinctive local heritage.

Our additions have been tested against 3 main criteria. These are:
– Views which cross local authority boundaries.
– Views which include surviving set-piece, historical views.
– Views which include major local landmark, which help define local areas.

Our proposed additions to Table 7.1

1.0 Regent's Park
1.1 the comprehensive panorama of Park surrounded by terraces, with specific views to include
1.2 Along Chester Road east towards Chester Terrace
1.3 Along Chester Road west towards Queen Mary's Garden 1.4 From Gloucester Green north to Highgate
1.5 From the Broadwalk east-south-east towards Gloucester Gate, St Katherine's Church, Cumberland Terrace
1.6 view across the boating lake westward towards Hanover Terrace

3.0 Views across Hampstead Heath
3.1 the panorama of the Heath extension seen from Sunshine Corner

3.2 the panorama of Hampstead Garden suburb from the upper Heath extension
3.3 the 180o panorama from the arcade of the Golders Green Crematorium with its unbroken tree line and the view northwards from the gardens
3.4 The planned view from the western end of the pergola and terrace of the Hill Garden towards the valley of the river Brent.

5.0 Haverstock Hill southward towards Chalk Farm, the City, and St Pauls (as shown in John Constable's 'Sir Richard Steele's cottage, Hampstead, 1831-32)

User: Argent (Property Development) Services LLP

Draft policy HC3: ‘Strategic and Local Views’

Part E of draft policy HC3 makes reference to a review of the London View Management Framework (LVMF). There are a number of references elsewhere in the draft London Plan to using digital technology and 3D models (draft policies D2 and D8) to support design analysis. Given the pace of change in London, these technologies are also important to inform an LVMF review and draft policy HC3 should make specific reference to their use in the review of the LVMF.

User: One Housing Group

Draft policy HC3: ‘Strategic and local views’

Part E of draft policy HC3 makes reference to a review of the London View Management Framework (LVMF). There are a number of references elsewhere in the Draft Plan to using digital technology and 3D models (draft policies D2 and D8) to support design analysis. Given the pace of change in London, these technologies are also important to inform an LVMF review and draft policy HC3 should make specific reference to their use in the review of the LVMF.

User:	London Borough of Newham

Policy HC3 Strategic and Local Views

LBN support this policy and it is considered to be complementary to Newham’s Draft Revised Local Plan.

User:	CFGN Community Food Growers Network

Sggested change to HC3: G

Boroughs should clearly identify important local views in their Local Plans and strategies. **Green space views and Waterways should be considered an important aspect of what a Borough plan considers an important local view.** Boroughs are advised to use the principles of Policy HC4 London View Management Framework for the designation and management of local views. Where a local view crosses borough boundaries, the relevant boroughs should work collaboratively to designate and manage the view.

User: Historic Royal Palaces

Historic Royal Palaces endorses the importance of the LVMF and its Supplementary Planning Guidance on the management of designated views. We welcome the statement in paragraph 7.3.4 that 'Some views are experienced as a person moves through a viewing area and assessment of development proposals should consider this.' Views are very rarely static and are nearly always kinetic or dynamic, a fact that is often overlooked, or avoided, in preparing formal assessments of the potential impact of development proposals on the setting of the Tower of London WHS .

We note that the Mayor intends to review the LVMF SPG when necessary to ensure its compliance with policies HC3 Strategic and Local Views and HC4 London View Management Framework. Historic Royal Palaces would not wish to see its scope and requirement s weakened or diluted in any way .

User:	Landscape Institute London

LI London supports the proposals and policies in the heritage sections of this chapter (7.0 - 7.4.1 and policies HC1-4) which are well considered and provide clear policy guidance.

User:	Landscape Institute London

LI London supports the proposals and policies in the heritage sections of this chapter (7.0 - 7.4.1 and policies HC1-4) which are well considered and provide clear policy guidance.

User:	Highgate Society

Support and comment

This policy vests too much discretionary power with the Mayor alone, in identifying significant views. It will be better to state that this task must be done in collaboration with local authorities and relevant local groups including amenity societies, CAACs and Neighbourhood Forums. Apart from this, we support it as a strong, aspirational policy.

User: Highgate Society

Table 7.1 London Panoramas

In Highgate's case, being a historic hilltop location, visible both from and to Central London, there are number of important additional views which should being added to this table. These include:

- *a view from the top of Waterlow Park overlooking London to the South (one of the few places from which St Pauls can be viewed without the intrusion of tall buildings)*
- *Parliament Heath to the east towards the Highgate Ridge including the spires of St Michael's Church and St Anne's' and St Joseph's dome Holly Lodge the Cemetery Athlone House and the whole west facing slope of the Ridge*
- *View down Archway Road , under Hornsey Lane Bridge to St. Pauls represents a true gateway to London from the north*
- *Upper junction of Southwood Lawn Road and Southwood Avenue giving extensive views over east London to Epping Forest*

We would also recommend that a number of important, but currently unprotected, views to the Hampstead-Highgate Ridge, which afford Londoners valuable views of a virtually uninterrupted skyline of predominantly trees and greenery, should be designated

User: Historic England

Historic England strongly supports policy HC3. Recent developments within the strategic views make a review of the Mayor's London View Management Framework SPG timely. Historic England is keen to engage with the review.

We welcome the recognition in HC3 part G, and para 7.3.6 of the supporting text, of the potential importance that should be attached to local views. We also welcome the reference to the importance of cross-collaboration between neighbouring authorities. In some circumstances we consider it would be beneficial for the Mayor's office actively engage.

Consideration should be given to enhancement. Where buildings currently detract or block the view the corridor should be maintained. Overtime this can allow the viewing corridor to be enhanced through redevelopment.

In relation to cross-boundary views, please see our comments on policy D8.

It may be helpful if the Mayor takes a clearer role where views affect more than one borough.

The policy should encourage boroughs to maintain and enhance viewing corridors beyond blocking or detracting features to allow for potential long-term enhancement.

User: Chairs of Camden's Conservation Area Advisory Committees

HC 3 'Strategic and Local Views'

General: We very much welcome the Mayor's recognition of Townscape Views in addition to the longer established Strategic Views. We welcome the listing of these views in the draft Plan (Table 7.1). We seek to add to these listed Townscape Views.
Our proposed amendments – reasoning: We propose additions to the list of Townscape Views in Table 7.1. Our additions seek to demonstrate greater inclusivity and respect for local communities, and greater recognition of distinctive local heritage.
Our additions have been tested against 3 main criteria. These are:
– Views which cross local authority boundaries.
– Views which include surviving set-piece, historical views.
– Views which include major local landmark, which help define local areas.

Our proposed additions to Table 7.1 (in alphabetical order)
1.0 Camden Town and environs
1.1 View from St Pancras Way northeast up Camden Road
1.2 View southwards at junction of St Pancras Way with Kentish Town Road
1.3 View from Royal College Street northwest at junction with Camden Road / Camden Road Station.

2.0 Eton / Haverstock Hill
2.1 Haverstock Hill southward towards Chalk Farm, the City, and St Pauls (as shown in John Constable's 'Sir Richard Steele's cottage, Hampstead, 1831- 32)

3.0 Hampstead and Hampstead Heath

Views across Hampstead Heath

3.1 the panorama of the Heath extension seen from Sunshine Corner

3.2 the panorama of Hampstead Garden suburb from the upper Heath extension

3.3 the 180o panorama from the arcade of the Golders Green Crematorium with its unbroken tree line and the view northwards from the gardens

3.4 The planned view from the western end of the pergola and terrace of the Hill Garden towards the valley of the river Brent.

3.5 Golders Hill Park bandstand to Harrow-on-the-Hill

3.6 Spaniards Road across the Vale of Health to the City.

4.0 Highgate

4.1 The views down Highgate High Street and Highgate West Hill to the City

4.2 The view from Parliament Heath east towards the Highgate Ridge including the spires of St Michael's Church and St Anne's and St Joseph's dome, Holly Lodge, the Cemetery, Athlone House, and the whole west facing slope of the Ridge

4.3 The view from just below the brow of North Hill, looking north over Finchley to the Barnet ridge

4.4 view of Highpoint from Hampstead Lane, across the school playing fields

5.0 Primrose Hill
5.1 views of the canal from bridges in Regent’s Park Road and Gloucester Avenue
5.2 views from the top of Primrose Hill in all directions, including the view east toward the water tower in Market Road Islington and beyond to Stratford
5.3 views towards St George's Terrace, Regent's Park Road, Albert Terrace, Ormonde Terrace and the zoo from Primrose Hill
5.4 from the junction of Oval Road and Gloucester Avenue looking north toward the Royal Free Hospital to Hampstead
5.5 view from Fitzroy Road to the Roundhouse
5.6 views from Edis Street and Princess Road over and beyond Camden market
5.7 view from Regents Park Road pedestrian bridge over and around the Roundhouse
5.8 views from Fitzroy Road, Ainger Road, Regents Park Road to Primrose Hill
5.9 view south down Gloucester Avenue to the West End

6.0 Regent’s Canal
6.1 Views along the Canal, from the towpath, especially from Cumberland Basin in both directions, through the bridges on Regent’s Park Road and Gloucester Avenue, views through Hampstead Lock, and in King’s Cross.

7.0 Regent’s Park
7.1 the comprehensive panorama of Park surrounded by terraces, with specific views to include
7.2 Along Chester Road east towards Chester Terrace
7.3 Along Chester Road west towards Queen Mary’s Garden
7.4 From Gloucester Green north to Highgate
7.5 From the Broadwalk east-south-east towards Gloucester Gate, St Katherine’s Church, Cumberland Terrace
7.6 view across the boating lake westward towards Sussex Place and Hanover Terrace
7.7 The view south to York Terraces East and West
7.8 The view through York Gate to the Marylebone church

7.9 Views north from Regents Park pitches to the Mappin Terraces and of the Snowden Aviary (London Zoo)

General request: Townscape views are valued highly by communities, and are often of fundamental importance to the sense of place, of local character and distinctiveness. Given that views may cross borough boundaries, we request that an effective mechanism be considered by the Mayor to enable local communities to identify views for inclusion in future versions of Table 7.1.

User:	Landsec
Paragraph 7.3.6 we agree with the Alliance that it is not appropriate to for Local Views to be afforded the same degree of importance as Strategic Views.	

User:	London Parks and Gardens Trust

The Trust believes Table 7.1 Designated Strategic Views takes insufficient account of the views from parks, in particular in relation to the Royal Parks and some other areas of rare open space within the Central London zone. Equally important views from parks include views adjacent to Battersea Park, Bishop’s Park in Fulham, Syon Park, Duke’s Meadow, Hampton Court and Kew as well as Victoria Tower Gardens. The Trust therefore would encourage the introduction of protection for all views from the Thames river bank (blue space) adding iconic views such as the one of Battersea Power Station from Vauxhall.

User: Lendlease

We support the overarching aims of both of these policies and agree that development should be sensitive to historic landmarks and vistas within the capital. However, such policies must be compatible with the wider spatial strategy set out in the plan and must provide clear guidance for both developers and decision-takers. They should not prevent well designed new development coming forward at the densities which will be required to meet the development targets within the plan.

In this regard, we are concerned by changes to these two policies which make them more onerous than the current plan, notably the following (our emphasis):

HC3(C): *"These and other views are also subject to wider assessment beyond the Protected Vista."*

HC4 (F3) "*development in the background should not harm the composition of the Protected Vistas, nor the viewer's ability to recognise and appreciate the Strategically-Important Landmark, whether the development proposal falls inside the Wider Setting Consultation area or not*"

These additions fail to provide a decision taker with a clear indication of how to apply these policies, this is contrary to the requirement set out in of para. 154 of the NPPF. The protected vistas, as defined in adopted policy, include both a Landmark Viewing Corridor in the foreground and a Wider Setting Consultation Area in the background. They therefore already include a specific background area to which the policy applies. The reason for extending this to a larger undefined area is not explained or justified. It is unclear how this policy would apply, creating uncertainty for both LPAs and developers. Furthermore, by providing additional undefined hurdles for development, the policies are not conducive to facilitating the increased delivery of much needed new homes and workspaces.

HC3(C) and HC4 (F3) should be removed as they are inconsistent with national policy, not justified and likely to be ineffective in facilitating the delivery of the planned growth targets. To ensure it is compatible with the delivery of the draft Plan we also consider that it necessary to review the LVMF SPG to ensure any changes which may be necessary to ensure its compatibility with the Mayor's clear plan for increased density are made and that it does not affect the delivery of the Plan.

User: Maritime Greenwich World Heritage Site

Policy HC3 Strategic and Local Views

[Replaces Policy 7.11: London View Management Framework]

Comment

We welcome the addition of Policies HC3 F and G to the new draft London Plan. Policy F requires Boroughs to include all designated views and protected vistas in Local Plans and work with Landowners to ensure inclusive public access to the viewing location and the views' foreground, middle ground and background are effectively managed in accordance with the LVMF SPG. Policy G requires Boroughs to clearly identify important local views in their Local Plans and strategies and where local views borough boundaries, the relevant boroughs should work collaboratively to designate and manage the view.

We believe that inclusion of designated views and protected vistas in Local plans is a step forward in encouraging boroughs – and cross borough consortia - to place greater emphasis on protecting these views. Similarly, by identifying important local views, the potential to maintain or enhance the Outstanding Universal Value of London's Word Heritage Sites is strengthened by giving a clear indication to developers what might give rise to an adverse impact on a world Heritage Site and what might or might not be acceptable in planning terms prior to the development of planning applications. We also endorse the supporting text in paragraphs 7.3.5 and 7.3.6.

User:	Cross River Partnership

The Thames

We welcome that “use and enjoyment” of the Thames is identified as a strategic function of the Central Activities Zone and protection afforded the Thames in strategic views (Policy HC3).

User:	Oneill Homer
HC3 Neighbourhood plans can identify and qualify important local views with appropriate design criteria that dovetail with other proposals for change in their local area.	

User:	Association of Consultant Architects
Policy HC3 lists protected “river prospects” but omits the view of the river from Richmond Hill (as also protected by Parliament).	

User: Karl Brown

Policy HC3 C In identifying Strategically Important Landmarks which make a very significant contribution to the image of London at the strategic level, the Mayors attention should be brought to the Gherkin. This iconic London landmark, designed as such - more so than an efficient office space - has been increasingly obscured by inferior towers of glass and steel. What is left should be given a high level of protection.

Other iconic views, with associated landmarks areas requiring protection are suggested to include: vistas to the City and Parliament from Waterloo Bridge; vistas up and downriver from Hungerford Bridge’s Golden Jubilee Bridges; and the St Paul’s view from the southern end of the Wobbly Bridge (given that every single tourist seems to photograph this one).

User: Primrose Hill Conservation Area Advisory Committee

HC 3 ‘Strategic and Local Views’

General: We very much welcome the Mayor’s recognition of Townscape Views in addition to the longer established Strategic Views. We welcome the listing of these views in the draft Plan (Table 7.1). We seek to add to these listed Townscape Views.

Our proposed amendments – reasoning: We propose additions to the list of Townscape Views in Table 7.1. Our additions seek to demonstrate greater inclusivity and respect for local communities, and greater recognition of distinctive local heritage.

Our additions have been tested against 3 main criteria. These are:

- Views which cross local authority boundaries.
- Views which include surviving set-piece, historical views.
- Views which include major local landmarks, which help define local areas.

Our proposed additions to Table 7.1
Primrose Hill
1 views of the canal from bridges in Regent’s Park Road and Gloucester Avenue
2 views from the top of Primrose Hill in all directions, including the view east toward the water tower in Market Road Islington and beyond to Stratford
3 views towards St George's Terrace, Regent's Park Road, Albert Terrace, Ormonde Terrace and the zoo from Primrose Hill
4 from the junction of Oval Road and Gloucester Avenue looking north toward the Royal Free Hospital to Hampstead
5 view from Fitzroy Road to the Roundhouse
6 views from Edis Street and Princess Road over and beyond Camden market
7 view from Regents Park Road pedestrian bridge over and around the Roundhouse
8 views from Fitzroy Road, Ainger Road, Regents Park Road to Primrose Hill
9 view south down Gloucester Avenue to the West End
10 Views along the Canal, from the towpath, especially through the bridges on Regent’s Park Road and Gloucester Avenue.
General request: Townscape views are valued highly by communities, and are often of fundamental importance to the sense of place, of local character and distinctiveness. Given that views may cross borough boundaries, we request that an effective mechanism be considered by the Mayor to enable local communities to identify views for inclusion in future versions of Table 7.1.

General request: Townscape views are valued highly by communities, and are often of fundamental importance to the sense of place, of local character and distinctiveness. Given that views may cross borough boundaries, we request that an effective mechanism be considered by the Mayor to enable local communities to identify views for inclusion in future versions of Table 7.1.

User: The Royal Parks

HC1 Heritage conservation and growth

Inappropriate development can significantly dilute the look and feel of heritage assets and undermine their value to the public. Any policy which effectively addresses this is supported by TRP.

HC2 World Heritage Sites

TRP supports this proposal. It is pleased that the Plan advocates that development proposals in buffer zones to WHS should conserve, promote and enhance the value of the site.

HC3 Strategic and local views, HC4 London View Management Framework

TRP strongly supports the protection and enhancement of existing strategic views (some of which have been undermined in recent years by inappropriate developments), and the creation of new protected views.

User: Regent's Park Conservation Areas Advisory Committees

HC 3 'Strategic and Local Views'

General: We very much welcome the Mayor's recognition of Townscape Views in addition to the longer established Strategic Views. We welcome the listing of these views in the draft Plan (Table 7.1). We seek to add to these listed Townscape Views.

Our proposed amendments – reasoning: We propose additions to the list of Townscape Views in Table 7.1. Our additions seek to demonstrate greater inclusivity and respect for local communities, and greater recognition of distinctive local heritage.

Our additions have been tested against 3 main criteria. These are:

– Views which cross local authority boundaries.

– Views which include surviving set-piece, historical views.

– Views which include major local landmarks, which help define local areas.

Our proposed additions to Table 7.1

Regent's Park

General comment / reasoning: We note that many of these views constitute views of outstanding importance, internationally recognized, and crossing LPA borders.

1 the comprehensive panorama of the Park surrounded by terraces, with specific views to include

2 Along Chester Road east towards Chester Terrace

3 Along Chester Road west towards Queen Mary's Garden

4 From Gloucester Green north to Highgate

5 From the Broadwalk east-south-east towards Gloucester Gate, St Katherine's Church, Cumberland Terrace

6 view across the boating lake westward towards Sussex Place and Hanover Terrace

7 The view south to York Terraces East and West

8 The view through York Gate to the Marylebone church

9 Views north from Regents Park pitches to the Mappin Terraces and of the Snowden Aviary (London Zoo)

General request: Townscape views are valued highly by communities, and are often of fundamental importance to the sense of place, of local character and distinctiveness. Given that views may cross borough boundaries, we request that an effective mechanism be considered by the Mayor to enable local communities to identify views for inclusion in future versions of Table 7.1.

Policy HC4 London View Management Framework

User: London Forum of Amenity and Civic Societies

In **Policy HC4 A** London Forum **strongly supports** the principle that “development proposals should seek to make a positive contribution to the characteristics and composition of Strategic Views and their landmark elements.” **This needs an explanation in the reasoned justification and a cross reference to Policy D8: Tall Buildings**.

In **Policy HC4 B** Line 1: Add “and background” after “middle ground” – not the same point as HC4 C.

In **Policy HC4 C** the words “external illumination” should be followed by ‘(see paragraphs 3.7.10 and 3.9.5 on light pollution)’

In **Policy HC4 D 1)** add ‘Development proposals in designated views should make a positive contribution,’

In **Policy HC4 D 2)** the reference to River Prospects views requires an additional section in Policy HC4 D ‘The frontage riverine industries (particularly in the case of the River Thames) should be protected as they service the water-borne traffic that helps to define the character and appearance of the river corridors and views that are a major element of London's USP (unique selling point).’

User: mr Alan Leibowitz

The protection of the River Thames should be more explicit, either in this part of the Plan or elsewhere. The river is being trashed. Any river ride will bear witness to the fact that we have been blind to the impact of development on this great asset of London. The river has been taken for granted, to the point where the great views of London and the pleasure given by the historic context around the river has been ruined in many places. This is not just a tragedy for Londoners, but for all the world who visit and who regard London as a city to admire and emulate. The river should be included in the View Management Framework. The River Thames needs urgent protection of its own. It is fragile and it is endangered. It is the Mayor's obligation to ensure that it is treated as London's most valuable natural asset.

User:	SAVE Britain's Heritage
Please see our comments on Policy HS2.	

User:	Putney Society

HC4.F.3 This, importantly, notes that one should look beyond as well as within the Wider Setting Consultation area, when considering the impact of a development proposal on a Protected Vista. (See also 7.3.3 and 7.4.1.)
7.4.1 See comments under 7.3.3 and HC4.F.3.

User:	Royal Borough of Kensington and Chelsea

7.3 Policy HC4 London View Management Framework

It is not clear why parts of the adopted London Plan (2016) 7,12 G and H have been omitted.

User:	National Trust London

On **Policy HC3 Strategic and Local Views** and **Policy HC4 London View Management Framework**, we are in support of the approach adopted. We note, however, that the vast majority of the existing Designated Strategic Views (Fig. 7.6) are from north, west, or central London – a product of historic wealth and power, and these areas' influence over London's development to the present day. This seems counter to your more inclusive approach to heritage engagement as presented in the Plan.

User:	City of London Corporation

This policy replicates existing London Plan policy with the exception of an additional requirement to consider the impact of the external illumination of structures in the background of a view. This additional requirement is supported.

User:	City of London Corporation

Paragraph B, could be worded more proactively and positively, changing ‘‘should not be overly intrusive, unsightly or prominent to the detriment of the view’’ to ‘‘should be of the highest design quality, responding positively to the composition of the view and its constituent landmarks’’.

User:	London Borough of Haringey
The Policy is supported.	

User:	London Borough of Lewisham
Support HC4 and the London View Management Framework.	

User:	London Borough of Brent
The Council supports this policy.	

User:	London Borough of Bromley
Policy noted although Bromley does not include any of the views within the London Views Management Framework.	

User:	London Borough of Tower Hamlets
We are broadly supportive of this policy.	

User:	Royal Borough of Kingston

Support including the importance of strategic views and recognition of the importance of local views. In this regard, policies HC3 and HC4 closely relate to, and support, Kingston’s Local Views Study which will be used for both decision making and plan making processes. Whilst RBK agrees that, as per policy HC3(G) , the principles of the London View Management Framework policy is relevant to local views, it would be useful if this was also stated in either the policy or accompanying text for HC4 to provide clarity and to ensure that the importance of local views is taken into account in development proposals.

User:	London Borough of Hackney

Paras A to F are broadly similar except:

Para C “Where a silhouette of a World Heritage Site is identified by the Mayor as prominent in a designated view, and well-preserved within its setting with clear sky behind, it should not be altered by new development appearing in its background.” This is a welcome strengthening of existing policy.

Para F4, concerning development in the foreground, is a welcome new policy.

User:	London Borough of Hounslow
LB Hounslow supports this policy	

User:	Alison Hatt

Tall buildings such as The Shard are out of proportion to its surroundings; too many commercial buildings in the city have spoiled the sky-line (Policy HC4) and are in danger of impinging on the World Heritage Site (Policy HC2) of the Tower of London to its detriment.

User:	London Borough of Richmond Upon Thames

General support for Policy HC 4. However, it will be necessary to ensure that the consultation area reflects the more extensive zone which has already impacted on the view from King Henry VIII’s Mound to St Paul’s Cathedral in future.

User:	London Borough of Harrow

The Policy is supported; as noted in response to Policy HC3 above, flexibility needs to be allowed with respect to balancing the implications of identifying important local views and protecting these with other planning considerations relevant to the view corridors.

User: Silvertown Homes

Paragraph 7.3.1 states both that ‘the Mayor will seek to protect the composition and character of these views’ and that ‘new development can make a positive contribution to the views’. Policy HC4 London View Management Framework by contrast states ‘development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements.’ Part F of Policy HC4 also states that ‘development in the background should not harm the composition of the Protected Vistas, nor the viewer’s ability to recognise and appreciate the Strategically-Important Landmark, whether the development proposal falls inside the Wider Setting Consultation area or not’. This statement does not feature in the adopted version of the Plan.

The terms ‘protect’ and ‘not harm’ do not necessarily have the same meaning. ‘Protect’ may be read as implying no change will be accepted whilst ‘not harm’ may be read as implying change can be acceptable.
The language used in the draft London Plan should be revisited to ensure it has a consistent meaning. Crucially this means providing clarity that new development that exceeds current building envelopes in such views will not be resisted in principle.

User:	West London River Group

We welcome the principles set out in HC4 but the connectivity in the plan between for instance, D8 Tall Buildings and HC4 London View Management Framework needs to be clearly articulated.

User: London Borough of Newham

Policy HC4 London View Management Framework

None of the designated views are within Newham. However, the policy at paragraph C states that development proposals in the background of a view should not harm the composition of the view as a whole. The requirement is repeated at paragraph F.3.

Manhattan Loft Gardens in Stratford and its intrusion on protected views of St Paul's Cathedral from Richmond Park have provoked a controversy in Newham. The development was located not within the protected view from one point to the other but lay a considerable distance behind St Paul's. The draft policy does not provide sufficient guidance as to how this situation should be managed, and the circumstances in which a building such as Manhattan Loft Gardens can be discounted as damaging a view.

User:	Historic Royal Palaces

As one of three strategically-important London landmarks identified by the Mayor (the other two being St Paul's Cathedral and the Palace of Westminster), the protection of key views of the Tower of London W HS provided by the LVM F is vitally important to maintaining the property's OUV. We therefore welcome and support the clear and specific guidance relating to designated views set out in policy HC4.

User:	Landscape Institute London

LI London supports the proposals and policies in the heritage sections of this chapter (7.0 - 7.4.1 and policies HC1-4) which are well considered and provide clear policy guidance.

User:	Highgate Society

Comment

The London View Management Framework is good, building on the above policy, but the wording should enable “and require” inter-borough cooperation

User: Redrow Homes London Division.

Paragraph 7.3.1 states both that ‘the Mayor will seek to protect the composition and character of these views’ and that ‘new development can make a positive contribution to the views’. Policy HC4 London View Management Framework by contrast states ‘development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements.’ Part F of Policy HC4 also states that ‘development in the background should not harm the composition of the Protected Vistas, nor the viewer’s ability to recognise and appreciate the Strategically-Important Landmark, whether the development proposal falls inside the Wider Setting Consultation area or not’. This statement does not feature in the adopted version of the Plan.

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The terms ‘protect’ and ‘not harm’ do not necessarily have the same meaning. ‘Protect’ may be read as implying no change will be accepted whilst ‘not harm’ may be read as implying change can be acceptable.

The language used in the draft London Plan should be revisited to ensure it has a consistent meaning. Crucially this means providing clarity that new development that exceeds current building envelopes in such views will not be resisted in principle.

User: Maritime Greenwich World Heritage Site

Policy HC4 London View Management Framework

[Replaces Policy 7.12: Implementing the London View Management Framework]

Comment

We note that Policies A – F of HC4 are substantively the same as those set out in 7.12 of the existing London Plan. We welcome the additional references to externally illuminated structures (HC4 C) and the statement that development in the background of a Protected vista should not harm its composition or the viewer's ability to appreciate the Strategically-Important Landmark (HC4 F3).

Specific Points

Policy HC4 C

We believe that in addition to external illumination, the exteria colour of a structure should not harm the composition of the view as a whole and suggest a text amendment as follows:

"C Development proposals *and external colour* and illumination of structures in the background of a view should give context to……"

User:	L&Q

Local Views

Paragraph 7.4.6 states that ‘local views should be given the same degree of protection as Strategic Views’.

It is self-evident that they should not. If these local views were of the same overall importance then they would be defined in the London Plan as ‘Strategic Views’.

User:	Association of Consultant Architects
Policy HC4 refers in paragraph 7.4 to “protected vistas”, but these are not de-fined anywhere.	

Policy HC5 Supporting London's culture and creative industries

User: Mr Ray Smith

Support - Sports and Recreation

The policy is something I would fully support but it is important that this reflects the huge contribution made by Travelling Showpeople to the family provision of entertainment for communities in London. Funfairs and Circuses, small and large, visiting local areas bring people to their local parks for high quality value for money entertainment and also pay to local authorities significant revenue, therefore rather than subsidised festivals which are of course vital to the life blood of the Capital, they are contributing in every way. Furthermore Funfairs are now found at events celebrating the cultural diversity of London at functions such as Christmas, Diwali, Eid, Chinese New Year and many more.

Unfortunately the Draft London Plan has no reference at all to Travelling Showpeople in any section, including the vital aspect of homes where they are excluded from any mention. They should also appear in this section.

User: MS J GELLER

Support - Culture

I agree totally that places for artists and designs should be more readily available at a more affordable price.

User: Mr Toby Laurent Belson

Comments cover: Accessible and Inclusive Design, Agent of Change, CAZ, Economy, Good Growth, Local Plans, Night-time Economy, Opportunity Areas and Growth Corridors, Play Space, Public Safety, Public Spaces, Pubs, Regeneration, Resilience, Retail, Social Infrastructure, Town Centres

Help produce a shift in thinking so that access to and the value of community spaces is not based on business plans and income generation but on the social value of the community space and its contribution to health and wellbeing, inclusion, integration, empowerment and poverty reduction.

Recognising the irreplaceability and uniqueness of many community spaces and looking after them for future generations is part of a continuing legacy.

Valuing and resourcing community-centred knowledge and creativity for the contribution this can make to policy discussions and a whole system approach to community engagement across the GLA.

Community spaces are not just physical buildings, but social spaces where cultural expression takes place. These social spaces provide movement and interaction between different cultures and it is important they are integrated as well as truly accessible to all.

Community spaces are essential to the achievement of lifetime neighbourhoods in which housing, health and education facilities, shops and other local amenities are affordable and accessible to everyone, now and for future generations, and there is support for community networks based on social co-operation and mutual aid.

Housing estates provide a wide range of community spaces – community halls, open spaces, playgrounds and other facilities – which must be protected and their use encouraged.

User: Mr David Trodden

Comment covers Culture

We were promised a venue would be included in the plans for the redevelopment & that it would attract nearly as many visitors as the now demolished Earls Court Exhibition Centre did (three million per annum).

On page 8 of the RBKC Local Plan 2015 it stated: “Earl’s Court will remain the location for a large convention centre or exhibition function.”

However in the RBKC Local Plan Partial Review Draft Policies Regulation Consultation dated 18 October 2016 this had changed to:

“Provide a replacement cultural destination within the Earl’s Court and West Kensington Opportunity Area.”

In January 2017 RBKC Council approved a “cultural venue” comprising an astonishing, risible 644 sq m with two minor side pavilions when the Exhibition Centre was 40,000 sq m in size. The Mayor now has the opportunity to revise the many, serious errors underpinning the Earls Court Masterplan and to ensure a vibrant mix of housing, trade, culture, entertainment, health facilities and sport for all.

User: London Borough of Sutton - Culture

Support - Culture

Recognise and specify the role of libraries and heritage in CEZ. There is no mention here. Very often a great deal of local cultural activity and and encouragement of the arts happens in libraries, E.G. the art gallery in Willesden Green library Brent, cultural programming and commissioning in sutton and new art gallery.

User:	The Selby Trust

The Selby Trust support this policy but would welcome the addition of a recognition that the voluntary and community sector and community spaces have an enormous role to play in the cultural and creative sector. Furthermore that these community run spaces have different challenges to the private sector and are sometime not recognised as part of cultural hubs but also need separate protection as community spaces. Boroughs should be asked to be open about their definition of cultural hubs and to include voluntary and community organisations and also to look to culture provided by different ethnicities and sectors (not just mainstream services).

User: Mr Rory Huston

Hello,

I think policy needs to be tighter, to suggest noise limit methodologies (eg noise council's report on noise limit setting becomes mandatory) , and loss of amenity of local residents to be incorporated. Their are campaigns a against overly larded festivals disrupting access to parks in several parks across London, showing precision in approach is needed

User: London Forum of Amenity and Civic Societies

The London Forum **strongly supports** this policy, especially HC5 C) 6) with regard to Agent of Change.

In **paragraph 7.5.1** the words ‘churches and locations for such activities as chess clubs,’ should be placed after “libraries,”. Apart from the normal religious and community activities that churches accommodate, they are an important performing and rehearsing venue for music and drama, locations for exhibitions and for events that are ceremonial rather than devotional such as funerals, weddings, state events and carol services.

In **paragraph 7.5.7** the following words should be added at the end ‘In seeking to promote events and activities, including commercial events, fairs and circuses, on a range of outdoor spaces a careful balance needs to be struck to ensure that the Royal Parks, local parks and other areas of incidental open space do not have events that occupy more that 15% of their open space, do not reduce access to them nor cause disturbance to residents living nearby.

User:	Central Acton Neighbourhood Forum

We strongly support the vision behind this policy. Our concern is that like similar policies in previous plans, no effort will be made to implement it. Instead, with the very strong drive to provide additional housing on every available site, this policy will carry no weight in practice. For example, where major proposals are referred to the Mayor where cultural or creative industries should be promoted they will not be because additional housing will be seen to be the greater priority.

User:	Love Wimbledon BID
Absolutely essential with the decline of public funding that our cultural attractions are supported.	

User: London Assembly Green Party Group

I welcome the Mayor’s decision to identify cultural and creative industries as one of the sectors he has pledged to promote and support, as well as policies to identify Creative Enterprise Zones.

However, currently the Mayor is pushing ahead with the demolition of Vittoria Wharf, the low-cost creative workspace that makes up one of the densest concentration of artist studios in Europe. The Mayor says that the amount of creative workspace in the Hackney Wick Masterplan will remain the same. However, research shows that only 10 per cent of the currently occupied low-cost studio space will be retained.

This is an example of bad regeneration on a scheme that the Mayor currently has control over. To prevent this in future, the policy should be amended to more clearly identify the existing businesses on sites as part of CEZs. This was recommended by the Regeneration Committee in its report Creative Tensions in March 2017.

Proposed amendment to HC5 C, adding a new section as part 1:

Where a Creative Enterprise Zone has been identified a comprehensive audit of existing businesses and jobs is undertaken and that they are fully involved in developing these areas.

https://savehackneywick.org/downloads/SaveHackneyWick-NineFalseStatements-20180111.pdf

Creative tensions. London Assembly Regeneration Committee, Mar 2017
https://www.london.gov.uk/sites/default/files/london_assembly_regeneration_committee_-_creative_tensions.pdf

User:	The Federation of City Farms and Community Gardens

London's culture includes city farms and community gardens. These spaces should be part of the cultural quarters. Brownfields sites, unused carparks and other outdoor spaces should be offered as 'meanwhile' spaces for community gardens. An example in Core Landscapes on an ex-car park at the Royal London Hospital in Whitechapel. Pictures here:
https://drive.google.com/drive/folders/0B_gMauOfpQZtNXNwYlhSVmxuR2M?usp=sharing

User:	The Federation of City Farms and Community Gardens
These spaces should include gardens.	

User:	The Federation of City Farms and Community Gardens
Meanwhile spaces should include gardens.	

User:	The Federation of City Farms and Community Gardens
Meanwhile spaces should include gardens.	

User:	The Federation of City Farms and Community Gardens
Meanwhile spaces should include community gardens.	

User:	Association of Licensed Multiple Retailers

UKHospitality unreservedly supports the Plan's recognition of the value and importance to London's culture and economy. This has been bolstered by the introduction of the night tube.

User:	Association of Licensed Multiple Retailers

We support the use of ACV but also warn against their potential inflexibility. While all reasonable efforts ought to be made to ensure the continuation of a cultural venue's contribution to a locale, ACVs ought not to be used to stop development altogether. A venue would be better off open and operating a slightly different model or format, than to be left shut and heading to dilapidation.

User:	Publica

Publica welcomes the commitment to use the planning system to protect existing venues, cultural facilities and services, as integral parts of London’s cultural infrastructure.

Publica also supports the provision of new cultural and creative venues, however our work has highlighted that the introduction of these should be considered in tandem with creative workspaces and studios, which are vital to the continued success of London’s cultural sector. Artists, designers, musicians, and performers are key to the maintenance of a diverse and exciting cultural city, and ensuring that their workspace is protected, and providing new workspaces that are affordable, will also be crucial to ensuring that talented people in the creative industries remain in London, where they contribute so much to London’s identity and economy.

User:	Publica

We would support measures that could extend the day in cultural buildings, particularly if this would enable them to be used for reduced rent, or if access was targeted at particular groups who struggle to be represented elsewhere. We agree that they can help to stimulate vitality in the street, and would add that open businesses can also confer a sense of safety to the public realm at night.

User:	Publica

By identifying Strategic Cultural Areas and Cultural Quarters, development of cultural activities can be focused and proactive. Prioritising these areas in the planning system can ensure that they are not threatened by competing interests. The designation and development of new Cultural Quarters is also supported where it can extend the hours of designated town centres, where night time activity is least likely to result in disturbances for local residents. New Cultural Quarters should reflect and enhance the existing character of the area, with daytime and night time uses complementing one another. For example, Publica has identified that an increase in Oxford Street's cultural and night time offer might complement that of neighbouring areas such as Soho and Covent Garden, potentially relieving some of the pressures on the West End Stress Area.

The unique character of each cultural quarter or cluster should be recognised and promoted. Extensive research and analysis is key to understanding the character of an area. Publica developed the City of London Cultural Hub Vision to acknowledge and enhance the unique identity of the Barbican and Golden Lane Area, and the central role that cultural uses play in defining the area's character.

User:	Publica

We welcome the inclusion of Cultural Quarters as part of the planning for Opportunity Areas, Areas for Regeneration and other large areas for development, although we suggest that the existing character and needs of current residents should be a consideration when undertaking regeneration, as noted above. It is also important to see the creation of new cultural quarters as an opportunity to support smaller, local artists and organisations, rather than relying on outposts of large institutions. London is home to many established grassroots arts organisations, and these should been seen as equally important in the anchoring of new, large developments.

User:	Publica

A positive example of community led cultural facilities is The Albert, a 'meanwhile' arts space, developed as part of the renewal programme on the South Kilburn estate, which hosted community and cultural events for a year from September 2012, involving over 60 creative collaborations. The Bussey Building in Peckham is another case study for successful integration into neighbourhood and used by local communities as well as creative industries. It includes spaces for cultural consumption alongside those for cultural production, in addition to important neighbourhood amenity.

User: Ms Valerie Munday

Enfield Archaeological Society agrees that London's culture and creative industries be supported however this should include existing museums that have a duty to preserve their archaeological & historical collections in suitable conditions so they can be preserved for posterity. Museums should have a vibrant exhibition programme to attract new audiences. Enfield Museum has organised exhibitions in the past including a Roman exhibition jointly curated by young people from local schools. Many people in Enfield do not realise that a Roman settlement exists beneath the streets of Bush Hill Park and Prehistoric and Roman periods are included on the National Curriculum for schools.

Enfield Museum has also organised joint exhibtions with BAME communities including 'Black is Beautiful' with girls from Enfield County School and an exhibition with the local Polish community and one organised to commemorate the Anniversary of the Abolition of the Transatlantic Slave Trade in 2007. Exhibtions which gave local groups pride in their cultural hertiage.

User: mr Alan Leibowitz

There needs to be a balance between competing uses of buildings, both existing and new. Culture and spaces for small businesses have suffered in the rush to solve the housing crisis. This is short-sighted. A city is a fragile ecology, and a focus on housing on its own, without places for people to work, make things, exhibit and have recreation will lead to a poorer city. Permitted Development should be fought wherever and however possible; and planning strategies should understand the need for non-residential uses, not only on ground floors of new residential developments (usually very poor space), but in buildings and groups of buildings as well.

User:	Mrs Ann Chapman

We support the vision behind this policy. Our concern is that like similar policies in previous plans, no effort will be made to implement it. Instead, with the very strong drive to provide additional housing on every available site, this policy will carry no weight in practice. For example, where major proposals are referred to the Mayor where cultural or creative industries should be promoted they will not be because additional housing will be seen to be the greater priority.

User: SAVE Britain's Heritage

Neutral - CAZ, Culture, Design, Economy, Historic Environment, Mix of uses, Night-time Economy, Regeneration, Social Infrastructure, Tourism, Town Centres

Historic buildings support cultural facilities and creative industries.. As recent evidence complied by Historic England shows, “The historic environment forms a vital part of the nation’s infrastructure by providing premises for businesses, amenities and utilities. Many of the shops, restaurants, hotels, offices, warehouses and industrial units within our towns and cities are located within pre-1919 traditional buildings. Therefore, the historic environment isn’t just about the past but is also an important part of current commercial activity.” (Heritage Counts, 2017: Heritage and the Economy).

User:	Putney Society

We support HC5.A.2 to spread cultural facilities more widely across London through locally-distinct clusters.

User:	Putney Society
7.5.11 The link between heritage and cultural offer should be made more explicit, this para should note the importance of historic venues as the backdrop to many cultural activities, frequently enhancing the emotional experience. This is a well evidenced aspect of London's creative offer.	

User: Telegraph Hill Society

Policy HC5 Support

We support policy HC5 as regard cultural and creative enterprises.

We would note however that, in order to do this, provision of affordable workspace is critical. See our comments on Policies E2 and E3 above.

User: Royal Borough of Kensington and Chelsea

7.4 Policy HC5 Supporting London’s culture and creative industries

The draft London Plan encourages boroughs to consider how their cultural offer serves diverse groups, and where it is lacking for particular groups. It also promotes the use of vacant space for temporary or pop up cultural uses. The Culture Service welcomes this commitment and already supports it through its community engagement work with local artists and arts organisations.

The Draft Plan recommends that boroughs identify strategic clusters of cultural attractions in their Local Plans. This Council already has a long history of this with Exhibition Road. The borough's ambitions for cultural placemaking and creating cultural quarters, particularly around Kensington High Street and the Design Museum will be supported by this provision in the London Plan.

Policy HC5 A (5) - The Council questions whether it is essential to ensure that *all* Opportunity Areas should include new cultural facilities. For example, the vision at Kensal is for a residential led neighbourhood, so perhaps this approach is not appropriate in all OAs.

User:	National Trust London

Policy HC2 World Heritage Sites, **Policy HC5 Supporting London's culture and creative industries**, **Policy HC6 Supporting the night-time economy**, and **Policy HC7 Protecting public houses** are all welcomed and supported by the National Trust in London. They are especially noted for the breadth of heritage they seek to preserve and promote, fostering a more inclusive understanding of heritage that reflects the diversity of Londoners (7.5.4) (7.6.11) (7.7.2).

User: Musicians Union London

The MU welcomes the identification of the need to recognise and support London's creative industries and the introduction of Creative Enterprise Zones. In terms of addressing issues of affordability, business rates is an area in which direct action can be taken. Cutting business rates would help to level the playing field with other cultural organisations and with competitors in other European countries where the average support for music venues is 42% of venues' income (the highest being France at 60%). London venues have faced increases in business rates by up to 200% as well as increased pressures from local authority licencing plans. It is important that these venues are given the necessary support in order to ensure that London's live music scene is able to grow and so that we don't lose acts to Europe where venues are generally of much higher quality. Musicians' fees are not enough to sustain a developing career and without some relief for the venues engaging them this will not improve.

As part of the creation of Creative Enterprise Zones we would also like to see the introduction of dedicated Musicians' Loading Zones. Please see the attached "MU Proposal for London Boroughs to allow specific loading and unloading provision for Musicians and DJs working in music venues". Similar successful schemes already operate in Seattle; Nashville; Austin, Texas and Yarra City in Victoria Australia. With gig fees already being so low, the risk of financial penalties for any necessary loading or unloading of equipment can make playing at certain venues economically unviable for a gigging musician.

We are also pleased to see a consideration of the value of pop-ups to a local area's cultural offering, rather than them just being considered for retail space as they often are. A successful example of this is Sound Lounge who were evicted from their Tooting venue last year by overseas developers buying the land. The venue had served the local community as a not-for-profit arts and live music space, which also provided free family workshops, charity events, art exhibitions and a soup kitchen for the homeless. They have since worked with Merton Council to re-open at a pop-up venue in Wimbledon.

User:	Confederation of Passenger Transport

Similarly London’s world renowned culture and performing arts should be available to all and CPT would urge that the same safeguards as those advocated for heritage sites are in place to ensure access for groups to these centres and events.

User: London Borough of Islington

Chapter

Heritage and Culture

Draft London Plan Policy

Policy HC5 supporting London's culture and creative industries

Islington Response

Policy HC5 aims to support the continued growth and evolution of London's diverse cultural facilities and creative industries through protecting existing venues, and supporting the development of new venues in town centres and the CAZ. We support the definition of culture set out in para 7.5.1, but it does highlight the issue that creative and cultural can be indivisible. This could create problems when implementing policy HC5, with significant overlap between designations.

The policy introduces the possibility to define locally-distinct clusters of cultural facilities as cultural quarters and protect and enhance strategic clusters of cultural attractions. While we acknowledge the distinction between local and strategic clusters, in practice they are likely to overlap, and therefore implementation of Part A (2 and 3) could be confusing.

Part A (or possibly the supporting text) should include reference to the following cultural infrastructure:

- the need for affordable, larger and/or grow-on spaces
- need for cultural rehearsal spaces – new buildings or improved access to current facilities
- need for film company unit bases to safely and non-disruptively enable film and TV production. Film London and industry partners recognise this as a huge issue.

Regarding Part A(5), we support the general focus but consider that there should be a caveat related to outdoor cultural space to ensure protection of designated open space.

Creative Enterprise Zones are introduced with appropriate policy to support CEZ development and the delivery of regeneration benefits. The council welcomes the opportunity to bid for CEZ funding and support the introduction of Creative Enterprise Zones as another mechanism to enhance our creative industries and implement creative, business led regeneration. The council's CEZ bid aims to align with the emerging policies in the Local Plan review and establish comprehensive strategies for creative and cultural designations.

There is some ambiguity relating to the aims of a CEZ in terms of enabling creative enterprise on the one hand and enabling leisure, recreation and community facility provision as outlined in Part C of policy HC5 on the other. Additionally, policy HC7 in the draft London Plan refers to the need to protect pubs where they contribute to objectives of a CEZ. The council support and understand the need for a range of measures to make CEZ's attractive places for creative enterprises to establish but the conflict of different land uses could potentially undermine the core function of CEZ and we would request some further clarity on this. There does not seem to be guidance for CEZ bidding cross referenced in the London Plan and if this is intended to be an ongoing mechanism this reference may be advantageous for clarity.

CEZ policy promotes new cultural venues but is silent on visitor accommodation, which means that policy E10 could be used to justify new hotels and hence potentially undermine the function of a CEZ, or at least diminish land available for more suitable uses identified in HC5(C). The policy should be amended to resist visitor accommodation within a designated CEZ.

We strongly support the principle of improving the cultural offer for different groups of people, set out in para 7.5.4, but we question how effectively this offer can be protected and promoted through the planning system. Further guidance/good practice would be welcome.

Para 7.5.5 refers to Assets of Community Value. As noted in our response to policy S1, while ACV can have material planning weight, they are not in themselves effective protection of a specific use, and there should be a strong caveat to this effect in the supporting text.

User: Port of London Authority

Please see the PLA's comments regarding Meanwhile Uses under policy H4 in section one above.

'**Policy H4 Meanwhile Uses**

Paragraph 4.4.1 of the Draft London Plan recognises that some vacant land is suitable for meanwhile use as housing and policy H4 encourages Boroughs to identify opportunities for the meanwhile use of sites while it is awaiting longer-term development.

Policy SI15 clearly supports the reactivation and use of Safeguarded Wharves for waterborne freight transport including through the use of compulsory purchase powers where necessary, to bring inactivate sites into use. It is also clear at SI15 (E) that temporary uses should only be allowed on a Safeguarded Wharf where they do not preclude the wharf being reused for waterborne freight handling uses. The PLA therefore considers that in order to ensure that Safeguarded Wharves can be reactivated in a timely manner; they should be specifically excluded from the land that Boroughs can consider for meanwhile use.

The PLA therefore recommend the following additional reasoned justification:

Suggested additional explanatory text after paragraph 4.4.1:

"***Sites safeguarded for industrial uses including Safeguarded Wharves are not considered appropriate for meanwhile uses due to the potential impact on their reactivation for industrial uses and waterborne***

cargo handling uses. *" '*

User: Theatres Trust

The Trust welcomes this policy. In particular, we support the identification of ‘Cultural Quarters’ and the recognition of the role arts and culture can play in local regeneration and town centre renewal. It is also important to note that cultural venues including theatres have a role to play in the overall growth of London, acting as anchors to improve the attractiveness of London’s neighbourhoods as places to live thus improving well-being. They also have a key role to play in attracting visitors to the city; as noted in paragraph 7.5.2 cultural tourism supports 80,000 London jobs and contributes £3.2 billion of GVA to the city annually.

We understand the premise of part 4, but would issue some caution against a blanket support for temporary use of buildings and sites for arts and cultural use. In principle we support such use, which can have benefits including allowing the testing of concepts and facilitating the development of arts and cultural groups. However, it should be ensured that where such uses come forward they do not undermine existing venues. A revision of the policy to emphasise that temporary uses are complimentary to nearby established uses would be recommended.

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User:	UK Music

12. We support Policy HC5 in the Draft London Plan on Supporting London’s culture and creative industries. In particular, we welcome the development of Creative Enterprise Zones (CEZ) in the capital.
13. Physical infrastructure is important to the development of the music industry in London. Without modern venues, studios and rehearsal spaces it would be impossible for new and existing artists and musicians to develop and grow audiences and fan bases.
3
14. Venues provide cultural hubs in communities across London. Grassroots venues offer a means by which musicians and performers can cultivate and nurture their creativity. London venues have faced increases in business rates by up to 200 per cent as well as increased pressures from local authority licencing plans. It is important that these venues are given the necessary support and equipment

User: UK Music

The UK creative industries are of huge economic and cultural importance. According to the most recent DCMS economic estimates the creative industries account for £91.8 billion in GVA.1

The UK creative industries also lead the world in terms of soft power. The reach and volume of our national cultural output supports our strength in soft power. According to The Soft Power 30, the UK is second to the US in terms of cultural soft power.

This trend continues in the capital, with £1 billion being generated in the capital in 2016 from music tourism and 3.6 million music tourists attending events in London last year. There were 8,615 full time jobs sustained by music tourism in 2016.

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User: City of London Corporation

The City Corporation welcomes and supports this policy which seeks to protect existing cultural clusters and gives explicit policy support for the identification and promotion of new cultural clusters. The policy also supports the use of vacant buildings and public spaces for cultural pop-ups. The approach taken in the policy is supportive of the City Corporation's joint working with key cultural partners in the north west of the City to develop Culture Mile.

The policy also provides the framework for the designation of Creative Enterprise Zones and provides detailed planning guidance for such areas. These CEZs are intended to include existing or emerging areas of creative industries. Where such designations are made, there needs to be sufficient flexibility within the policy to allow for local distinctiveness and for creative industries to respond to local context.

The Plan should explore how existing clusters of cultural attractions could house, support, work alongside or be in close proximity to creative enterprise zone clusters and new spaces for the creative industries. This would reflect the interdependency of culture and the wider creative industries, would encourage cross-sector collaboration and create dynamic neighbourhoods.

User:	City of London Corporation
Explanatory text, paragraph 7.5.11 – the Barbican and Culture Mile in the City of London should be added to the list of strategic clusters of cultural attractions.	

User:	London Fire and Emergency Planning Authority

Supporting London’s culture and creative industries

21. Under Policy HC5 Supporting London’s culture and creative industries, the draft London Plan encourage the temporary use of vacant buildings and sites for cultural and creative activities. This is something LFEPA supports and is currently seeing the benefits of at The Workshop, at the 8 Albert Embankment site in Lambeth. The pop up museum there has seen circa 20,000 visitors in 2017 alone, all of whom have had the opportunity to explore the history of the fire brigade in London, learn about fire safety and improve their own safety in the home. A permanent museum is planned for the site within the lifetime of the London Plan. As well as being a cultural offering this would also support the aspirations set out in D10 and D11 of the London Plan through public education programmes contributing towards maintaining a safe and secure environment in London, including delivering fire safety information.

User: London Assembly Labour Group

Suggested changes

We would like a clearer definition of Policy A2 identify and promote new, or enhance existing, locally-distinct clusters of cultural facilities, venues and related uses defined as Cultural Quarters, especially where they can provide an anchor for local regeneration and town centre renewal

Justification for policy recommendations

To ensure clarity.

Suggested changes

“educational” should be added to Policy C5 so it now reads “integrate public transport, digital and other infrastructure and service provision such as leisure, recreation, educational and community facilities in the establishment and development of the Creative Enterprise Zone”

Justification for policy recommendations

To encourage access to cultural resources to young people and to encourage continued growth of skills and the cultural sector.

User: Stonewall Housing

Stonewall Housing's services deliver support and advice about a range of issues as well as housing, for example, mental health, work-ready and financial hardship.

We welcome that the London Plan seeks to protect the community assets for communities in the shape of commercial venues, such as public houses (**POLICY HC5** and **POLICY HC7**), however we believe that London needs community spaces for our communities that do not centre on the intake of alcohol or night-time time economy. Rather, more day-time, community spaces are needed for our communities to meet and support each other, especially since many do not have the support of family.

The London Plan should recommend the strategic engagement with LGBT communities to develop the spaces that are needed by them and the organisations that support them (especially since we, like women's groups and BAME people, face the pressures of high cost office and meeting space in the city (**POLICY E2** and **POLICY E8**).

User: London Assembly Planning Committee

Recommendations

We welcome the fact that the new London Plan Policy HC5 part A5 now requires Opportunity Areas and large-scale developments to include cultural venues and/or space for outdoor cultural events. However, we would like to see the Plan include a more prescriptive definition of ‘large-scale mixed use development’ in Policy HC5 part A5. Alternatively, we would like to see a requirement for developments of over 100 dwellings to produce a Culture Action Plan. The policy should also include reference to protecting and enhancing cultural facilities in outer London specifically.

8.5 The London Assembly Regeneration Committee report, Creative tensions: Optimising the benefits of culture through regeneration, asked the Mayor to assess the value of requiring “a robust Culture Action Plan” for new developments over 100 dwellings, as is the practice of the London Borough of Wandsworth.

8.6 It is not clear what kinds of development Policy HC5 part A5 should be applied to. While major and minor developments have a planning definition, what is meant by ‘large-scale mixed use developments’ is open to interpretation. A clearer definition would ensure a more rigorous application of this policy.

8.7 For example, a more commonly used term is ‘large-scale major development’, which has a more widely accepted definition. A large-scale major development is defined as a development of over 200 residential units, or over 4 hectares in size where the number of residential units is not given. For other uses a floorspace of 10,000 square metres or more or where the site is over 2 hectares in size or more, constitutes a large-scale major development.

User:	London Borough of Lambeth

Lambeth supports the intention behind this policy. However, in practice it may be difficult to protect a specific venue/operator as distinct from the land use of the site, given the way the planning system works. This will be a particular issue of the operator is a leaseholder rather than the freeholder of a property. Would protection of a venue blight a site if the venue/operator fails?

See also the comments about monitoring of cultural infrastructure under Chapter 12.

Joint working with licensing powers will be critical to ensure effective implementation of this policy.

User:	University of the Arts London

In the guidance on Local Plan policies, where a Creative Enterprise Zone has been identified, the Plan should specifically encourage the contribution that further education colleges and higher education institutions can make to the development of the Zone. This is essential to promote such thinking – particularly given the diversity and geographical spread of London’s creative discipline specialist institutions, and their ability to leverage both resources and networks.

User:	Save Hackney Wick

Broadly support this policy.

A1) Support cultural venues “where appropriate”. What makes the support of a venue appropriate or not should be qualified.

A4) Pop-ups risk exploiting creative businesses by giving them an uncertain, temporary basis in which to operate and moving them on once development arrives. We believe the reasoning behind pop-ups should be explained and that small enterprises should be seen as a more serious part of the future of an area, not just add-ons for developers, which is commonly the case, for example Clarnico Quay in Hackney Wick.

A5) *Existing* cultural venues etc should be assessed and protected as part of any Opportunity Area, not just new venues.

User:	London Borough of Haringey
The Policy is supported.	

User:	London Cycling Campaign

Add:
integrate public transport, ***high quality cycle infrastructure*** , digital and other infrastructure

User:	London Borough of Barking & Dagenham

The Council strongly supports the focus on London’s culture and creative industries. The borough has put itself forward as a Borough of Culture, (enterprise area) and is at the heart of the Thames Estuary Production Corridor with ambitious but rapidly developing plans to establish Dagenham as a film and media centre. We have helped grow creative industries locally by securing affordable creative industry space and cultural facilities in new developments. The policy not only needs to secure affordable space for creative industries but also cultural facilities which celebrate local history, achievements, and creativity, an example of this locally is the space we secured for the East End Women’s Museum. There is a burgeoning arts scene and a growing creative industries sector locally and we welcome the Mayor’s support for this vital part of London’s economy.

User:	London Borough of Lewisham
We support HC5 as it will assist with our CDI Sector growth, Creative Enterprise Zone and Thames Estuary Growth Corridor.	

User:	London Borough of Brent

The Council supports this policy.

In particular, the Council welcomes the protection and promotion of cultural institutions such as Wembley Stadium and Wembley Arena in paragraph 7.5.11.

User:	London Borough of Bromley

The introduction of this policy which provides more specific guidance in relation to the promotion and management of cultural venues, clusters and enterprise zones is noted.

User: London Councils

The broad aims of this policy can be supported. However, there remains a question of what support is offered to those boroughs that do not have a CEZ (Creative Enterprise Zones) grant allocated by the GLA.

The policy also suggests boroughs integrate transport, digital and other infrastructure when establishing a CEZ. The London Plan does not detail how boroughs can work with TfL in order to align transportation with the CEZ where improvements are necessary.

It is also unclear what levers boroughs have to provide affordable workshops for artists, who have an income of around £10,000 per annum. The London Plan can helpfully provide further clarity on these points.

User: Old Bermondsey Village Neighbourhood Forum

Aside from a marked reduction in the importance given to neighbourhood planning, our overarching criticism is that there is no clear instrument that checks development targets demanded of local authorities (especially in Opportunity Areas) by policies GG2, H1, H2, D6 and D8 against the importance of the preservation and enhancement of the social and built fabric of London highlighted in policies H5, H6 HC1, HC3, HC5, and HC7.

We think there is a need to balance the opportunities offered to local authorities in the DLP by way of identifying, protecting and nurturing the distinct identity of areas as the basis for sustainable development versus the potential abuse of these opportunities by planning departments – in particular where potential exists for opportunity areas, site allocations and cultural quarters to become used as guises for insensitive profit driven high-rise and monouse (housing dominated) development.
Neighbourhood Forums should be empowered to have a better part to play in this by the DLP.

The New Southwark Plan for example has just completed formal consultation ignoring widespread calls for a borough wide local list. It contains deeply unsound Area Visions and Site Allocation Policies that ignore local consultation and make no reference to key guidance like Historic England's Advice Note 3 for example.

User:	London Borough of Tower Hamlets
We support this approach and consider it aligns with our approach and provides useful additional content on temporary uses/vacant properties	

User:	Royal Borough of Kingston
Support, and welcome the ability to develop locally specific policies, which RBK will do in the new Kingston Local Plan. Removal of reference to an impact assessment and sequential test is noted.	

User:	London Borough of Hackney

This is new policy and is broadly welcomed.

This policy encourages Boroughs to identify Creative Enterprise Zones in areas where there are clusters of creative industries. There are is a strong clusters of creative industries in Hackney including in Shoreditch, and Hackney Wick, Hackney Central and Dalston. Hackney would like to work with the GLA to consider future designations.

User:	London Borough of Hounslow
LB Hounslow supports this policy	

User:	Hammersmith and Fulham Disability Forum

42. Policy HC5 Supporting London's culture and creative industries.
We are disappointed that there is no link to inclusive design or ensuring London’s culture and creative industries meet the needs of disabled people living or visiting London. We recommend links to other Policies such as D3 Inclusive Design to correct this oversight.

User:	Westminster City Council

Criterion A4 should make clear that any encouragement of pop-ups and meanwhile uses should be subject to proper consideration of all relevant material considerations including their impact on residential amenity and the agent of change principle.

User:	London Borough of Redbridge

The Council strongly supports this policy. This is evidenced in the Ilford Delivery Prospects and helps provide some planning weight to the ambitions of the Prospectus. The Council supports the Mayor’s commitment to protecting the arts/culture/creative sectors as key assets, not just in central London locations, but across the capital. As such, reference to designating Creative Enterprise Zones is welcomed. The cultural diversity of Ilford’s community offers an opportunity to create a vibrant and attractive town centre, with clusters of opportunities for high quality leisure and culture uses and a new civic presence. The intention to protect and promote creative workspace is also welcomed.

User: London Borough of Wandsworth

The policy supports the current approach in Wandsworth that the Council would want to see maintained. The creative sector is an important and growing part of the Wandsworth economy. The Creative Enterprise Zone (CEZ) concept is welcomed but seems a little isolated from the relevant employment policies which should be referenced. CEZs are also currently a GLA programme with funding attached and it is unclear whether their inclusion in a Local Plan is a requirement of this funding or whether the local planning authority can choose to make such a designation.

Whilst the coexistence of cultural facilities and creative industries is often of fundamental importance, it is important to understand the distinction between the two as the former will invariably operate to a different business model than a mainstream enterprise. The London Plan should enable creative enterprise and clustering to be supported and encouraged outside of formalised CEZs. Also provide support for cultural and creative enterprise and facilities, which do not form part of a localised strategic cluster, whether or not this is a CEZ.

The Council supports the protection of “existing cultural venues, facilities and uses” and propose the GLA consider how creative industries can be offered similar protections. Currently creative business is being pushed out of many parts of London through redevelopment and rising rents. Whilst clustering is attractive and offers varied benefits, cultural venues and facilities are not always clustered and may exist in varied corners or centres of a borough, successfully serving local and wider communities and attracting footfall which supports other local business. This should be acknowledged as valuable.

The London Plan should make facility for creative enterprise and clustering to be supported and encouraged outside of formalised CEZs. It should support cultural and creative enterprise and facilities which do not form part of a localised strategic cluster, whether or not this is a CEZ.

User:	London Borough of Richmond Upon Thames

This sets the context to support and enhance arts, culture, sport and entertainment, the areas that contribute to the tourist and visitor economy which are important in the borough. London’s Arcadia (the parks, gardens, historic buildings and landscape scenes covering the stretch of the Thames running from Teddington beneath Richmond Bridge to Kew) is recognised at paragraph 7.5.11.

User:	London Borough of Harrow
The Policy is supported.	

User:	Royal Borough of Greenwich

HC5A

Support this new policy and its explicit focus on protecting and promoting cultural facilities throughout London, based on a wide understanding of what constitutes culture.

User:	Royal Borough of Greenwich

HC5B-C/7.5.12 - 7.5.13

Question if the definition of ‘creative industries’ included in the glossary is sufficiently detailed to enable effective implementation of this policy. The supporting paragraphs provide some clarity about the nature/type of space envisaged to be provided, however if this narrower understanding of creative industries isn’t reflected in the glossary definition there is a risk that the intent of the policy will be diluted.

User:	Royal Borough of Greenwich

HC5B-C/7.5.12 - 7.5.13

Question if the definition of ‘creative industries’ included in the glossary is sufficiently detailed to enable effective implementation of this policy. The supporting paragraphs provide some clarity about the nature/type of space envisaged to be provided, however if this narrower understanding of creative industries isn’t reflected in the glossary definition there is a risk that the intent of the policy will be diluted.

User: Rugby Football Union

In respect of Policy HC5 ‘Supporting London’s culture and creative industries’, the RFU supports the protection of existing cultural venues, facilities and uses. However, in respect of paragraph 7.5.1, the RFU would comment that Twickenham Stadium is a ‘national stadium’ as opposed to a ‘sporting venue’ and ‘national stadiums’ should clearly be referenced within paragraph 7.5.1 as part of the capital’s cultural facilities and venues.

Suggested amendment to paragraph 7.5.1:

*“…Cultural facilities and venues include premises for cultural production and consumption such as performing and visual arts studios, creative industries workspace, **national stadium**, museums, theatres, cinemas, libraries, and music and other entertainment venues, including pubs and night clubs. Although primarily serving other functions, the public realm, parks, skate-parks and sports venues can provide important settings for a wide range of arts and cultural activities”.*

The RFU supports the inclusions of paragraph 7.5.11 regarding London’s internationally-renowned cultural institutions. However, the RFU request that Twickenham Stadium is reference within this paragraph to sit alongside the other four national stadiums within London.

Suggest amendment to paragraph 7.5.11:

*“London is internationally-renowned for its historic environment and cultural institutions, which are major visitor attractions as well as making an enormous contribution to the capital’s culture and heritage. There are many areas in London which are rich in cultural heritage and have a unique cultural offer. These act as key visitor hubs for Londoners and domestic and international tourists and as such should be protected and promoted. They include: clusters of museums such as the South Kensington museums complex: the theatres, concert halls and galleries of the Southbank/Bankside/London Bridge area; the theatres and cinemas of the West End; Wembley Stadium and Wembley Arena; **Twickenham Stadium;** the Greenwich Riverside and O2 Centre; the Olympic Park; and London’s Arcadia including Kew gardens, parks, historic buildings and landscapes between Hampton Court and Kew along the River Thames. Boroughs should identify these and other strategic clusters of cultural attractions in their Local Plans.*

User:	London Borough of Enfield

Policy HC5 looks at the ‘Culture and Creative Industries’. It needs to reference that culture is an opportunity to address inequalities. However, the policy needs to distinguish the difference between Cultural Quarters and Creative Enterprise Zones. There is a need to set out how authorities are to determine demand for creative industries.

User: Save Earl's Court Campaigners & Save Earl's Court Supporters Club

Empress Place in the London Borough of Hammersmith and Fulham is under threat of demolition by Earls Court Properties Plc who last year wished to include it in the Earls Court Masterplan but instead the Council granted “meanwhile use” to keep the Prince of Wales pub and adjacent shops open on a pop up basis for 3-5 years. Thanks to a robust, resident-led campaign, the Prince of Wales pub has been nominated as an Asset of Community Value.

Empress Place is part of what local campaigners call the “Lillie enclave”, which they want to preserve as a conservation area.

This pretty terrace along with its adjacent parade of shops (designed by architect John Young) and two pubs should be preserved to be the gateway to a “commercial and cultural quarter” on the Earl’s Court Masterplan.

More and more artists and small businesses are being displaced by developments or find it difficult to make the leap from a small space such as a railway arch to something affordable. Therefore we envisage a genuinely affordable provision of space that is linked to the venue and accessed via Empress Place.

A current example of artists and artisans being displaced is the plight of the occupants of the Old Gas Works in Fulham. 120 creative enterprises were evicted at the end of 2017.

The importance of creative enterprises to London’s economy is recognised in the GLA’s Creative Industries Working Paper 2015. This informs us that in 2012 London’s creative industries contributed £36.4 billion Gross Value Added (GVA) to the economy, 10.7 per cent of the total GVA for London.

Creative Enterprise Zones

The Mayor has put forward the possibility of setting up a number of Creative Enterprise Zones in London where creative industries would be defended and encouraged.

In our view one such Zone should be the Earl's Court and West Kensington Opportunity Area along with Earl's Court. This is due to the area's incredibly rich cultural history, its central location and excellent transport links. There is also the benefit of proximity and linkages to Olympia, Exhibition Road and the new Design Museum. By doing so, it will help to restore creative and entrepreneurial capital in the area to serve London and the UK post-Brexit.

Learning Zones

We suggest a training hub for upskilling local people who wish to pursue a career with London Underground, which would be based at the Lillie Bridge depot's Ashfield House training facility which should not be demolished as part of the Earls Court Masterplan.

There would also be opportunities for apprenticeships as our proposed green venue's construction gets under way.

Few residents are aware of the work undertaken at the Lillie Bridge depot and therefore it is largely unappreciated by local residents. We suggest night-time visits to the depot – or "open nights" instead of "open days".

We see real potential in assisting budding entrepreneurs by revisiting local history to inspire new businesses and giving them space within the Opportunity Area.

Women in brewing is a growing trend, so we can imagine botanical brewing given the brewing and horticultural history of the locality. Training links could be forged with the Institute of Brewing and Distilling.

Music Zones

The Mayor's January 2017 report entitled Rescue Plan for London's Grassroots Music Venues – Making Progress shows that such venues bring £92m to London's economy every year. They also support 2,260 jobs. On average, each venue spends some £500,000 on developing and showcasing new and emerging talent. London's grassroots venues pay around £2.8m in business rates each year.

We envisage a music zone from Earl's Court and across the Opportunity Area so as to include the legendary venue the Troubadour. The Mayor is committed to using the Agent of Change principle to protect music venues, clubs and pubs.

Submitted on behalf of Save Earl's Court Campaigners and Save Earl's Court Supporters Club

User: Mama Ujuaje

The entirety of this can be rewritten substituting land/land based resources/production for where reference is made to cultural facility and creative industry

HC5

A. The continued growth and evolution of London's diverse cultural facilities, food production, supply and creative industries is supported. In Local Plans and through planning decisions, boroughs should:

1. protect existing cultural and food supplying venues, spaces and facilities and uses where appropriate and support the development of new cultural and food supply venues and spaces in town centres and places with good public transport connectivity

2. identify and promote new, or enhance existing, locally-distinct clusters of cultural facilities, food supply spaces, venues and related uses defined as Cultural Quarters or food hubs, especially where they can provide an anchor for local regeneration and town centre renewal

3. identify, protect and enhance strategic clusters of cultural attractions and food supply hubs

4. consider the use of vacant properties and land for pop-ups or meanwhile uses for cultural, food supply and creative activities during the day and at night-time to stimulate vibrancy and viability and promote diversity in town centres, Cultural Quarters and other areas

5. seek to ensure that Opportunity Areas and large-scale mixed-use developments include new cultural venues, food supply hubs and/or facilities and spaces for outdoor cultural events.

B. Boroughs are encouraged to work with the Mayor and relevant stakeholders to identify Creative Enterprise and Zones and Food Supply Hubs in Local Plans:

1. in areas that have emerging or existing clusters of creative industries and food hubs or

2. in areas of identified demand and more deprived areas where there is evidence that the designation of a Creative Enterprise Zone or Food Hub will enhance the local economy and provide facilities and workspace for the creative and food related industries.

C. Where a Creative Enterprise Zone/Food Hub has been identified, Local Plan policies should:

1. develop, enhance, protect and manage new and existing creative workspace, food growing/market spaces providing flexibility for changing business needs, and an attractive business environment including related ancillary facilities

2. support existing, and the development of new, cultural venues and food supply centres within the Creative Enterprise Zone/Food Hub

3. help deliver spaces that are suitable, attractive and affordable for the creative industries, taking into account the particular requirements of established and emerging creative businesses, economic and health promoting businesses in the Creative Enterprise Zone/Food Hub in accordance with Policy E2 Low-cost business space, Policy E4 Land for industry, logistics and services to support London's economic function and Policy E8 Sector growth opportunities and clusters

4. encourage the temporary use of vacant buildings and sites for creative workspace and associated activities

5. integrate public transport, digital and other infrastructure and service provision such as leisure, recreation and community facilities in the establishment and development of the Creative Enterprise Zone/Food Hub

6. support a mix of uses which derive mutual benefits from, and do not compromise, the creative industries and cultural facilities in the Creative Enterprise Zone/Food Hub in line with the Agent of Change principle (see Policy D12 Agent of Change)

7. contribute to the achievement of wider objectives for the business location such as the economic vitality and diversity of a town centre or the intensification of an industrial area.

Suppoting text:

London’s rich cultural offer includes visual and performing arts, music, spectator sports, festivals and carnivals, pop-ups and street markets, and a diverse and innovative food scene, which is important for London’s cultural tourism. The capital’s cultural offer is often informed, supported and influenced by the work of the creative industries such as advertising, architecture, design, fashion, publishing, television, video games, radio and film. It is also informed by a historical legacy of Britain’s diverse communities, their lifestyles, culture and faiths, including, importantly, their food culture. Cultural facilities and venues include premises for cultural production and consumption such as performing and visual arts studios, creative industries workspace, museums, theatres, cinemas, libraries, and music and fresh and prepared food outlets and other entertainment venues, including pubs and night clubs. This also includes venues in which London’s diverse communities celebrate their cultural calendars, births, weddings and deaths and hold community meetings to foster social cohesion, integration and well-being. Although primarily serving other functions, the public realm, parks, skate-parks and sports venues can provide important settings for a wide range of arts and cultural activities.

7.5.2
London’s culture sector and the creative industries deliver both economic and social benefits for the capital. In 2015, the Gross Value Added (GVA) of the creative industries in London was estimated at £42 billion, accounting for just under half of the UK total from these industries, and contributing 11.1 per cent to London’s total GVA. Cultural tourism supported 80,000 jobs and contributed £3.2 billion of GVA to London in 2013, just under a third of the overall contribution from the tourism sector as a whole. As well as being one of London’s most dynamic sectors, culture also plays a role in building strong communities, increasing healthy life outcomes and generating civic pride. The more obvious of this sector revolves around the cultural production, supply and consumption of food.

7.5.3
Despite this positive general picture, London’s competitive land market means that the industry is struggling to find sufficient venues to grow and thrive, and is losing essential spaces and venues for cultural production and consumption including restaurants, cafes, meeting spaces, theatres, pubs, clubs and music venues. Creative businesses, community leadership and artists also struggle to find workspace and secure long-term financing and business support as their activities are perceived to be ‘risky’ or of non-commercial value.

7.5.4
Boroughs are encouraged to develop an understanding of the existing cultural offer in their areas, evaluate what is unique or important to residents, workers and visitors and develop policies to protect those cultural assets. Boroughs should draw on the Mayor's forthcoming Cultural Infrastructure Plan to assess and develop their cultural offer. Boroughs should also consider how the cultural offer serves different groups of people (such as young people, BAME groups and the LGBT+ community), and where the cultural offer is lacking for particular groups. Boroughs should, in consultation with the relevant community organisations, put in place policies and strategies to ensure that cultural facilities catering for such groups and communities are protected, especially facilities that are used in the evening and night time and at weekends.

7.5.5
The loss of cultural venues, facilities or spaces can have a detrimental effect on an area, particularly when they serve a local community function. Where possible, boroughs should protect such cultural facilities and uses, particularly those with an evening, night-time or weekend use, and support nominations to designate them as Assets of Community Value. Where a development proposal leads to the loss of a venue or facility, boroughs must consider requiring the replacement of that facility or use.

7.5.6
Boroughs are also encouraged to support opportunities to use vacant buildings and land for flexible and temporary 'meanwhile uses' or 'pop-ups' especially for alternative cultural day, night-time and weekend uses. The use of temporary buildings and spaces for cultural and creative uses can help stimulate vibrancy, vitality and viability in town centres by creating social, cultural and economic value from vacant properties. Meanwhile uses can also help prevent blight in town centres and reduce the risk of arson, fly tipping and vandalism. The benefits of meanwhile use also include short-term affordable accommodation for SMEs and individuals, generating a short-term source of revenue for the local economy and providing new and interesting shops, cultural and other events and spaces, which can attract longer-term business investment. Parameters for any meanwhile use, particularly its longevity and associated obligations, should be established from the outset and agreed by all parties after thorough consultation with community organisations.

7.5.7
Events and activities such as festivals, seasonal markets, exhibitions, performances, outdoor concerts and busking are not always dependent on using a dedicated cultural facility or venue and can make use of a range of outdoor spaces including streets, parks and other public areas. These types of activities, which are often free, offer a way for everyone to experience and participate in London's rich cultural life. The opportunity to incorporate these uses should be identified and facilitated through careful design. However, the lack of community spaces in which to plan and organise many of these outdoor 'free' events might mean they disappear entirely or are poorly planned and resourced. For this reason and the fact that they make an important contribution to the economy of particular boroughs and the capital, Councils must support community spaces and food hubs which may play an important role in enabling these events and activities.

7.5.8
As well as protecting existing venues and facilities, boroughs should also work with a range of partners, especially community organisations and cultures which often are excluded, to develop and promote clusters of cultural activities and related uses and define them in their Local Plan. A successful Cultural Quarter should build on the existing cultural character of an area and encourage a mix of uses, including cafés, restaurants and bars alongside cultural assets and facilities, to support the coherence, integration and survival of diverse communities, attract visitors and generate interest. A Cultural Quarter can be used to form the basis for sustained cultural activity but may also include temporary activities and uses such as festivals, markets, exhibitions, performances and other cultural events.

7.5.9
Where appropriate, boroughs should use Cultural Quarters to seek synergies between cultural provision, schools, and higher and further education which can be used to nurture a more cohesive and integrated community sector, be the basis of diverse and varied economic activity, enable neighbourhoods to be more attractive and pleasant places to live, encourage volunteering, new talent and audiences. This can include partnerships with a range of cultural organisations, such as community cultural organisations, libraries, museums, galleries, music venues, dance studios, and theatres.

7.5.10
Boroughs, in consultation with diverse community organisations, should maximise opportunities for developing Cultural Quarters in Opportunity Areas, other Areas for Regeneration and large-scale developments. The inclusion of new cultural venues, hubs and facilities can assist with place-making, the creation and establishment of lifetime neighbourhoods, creating an attractive and vibrant area for residents, workers and visitors, as well as helping to form the character and distinctiveness of a new place.

7.5.11
London is internationally-renowned for its historic environment and culturally diverse institutions, which are major visitor attractions as well as making an enormous contribution to the capital's culture and heritage. There are many areas in London which are rich in cultural heritage and have a unique cultural offer. These act as key visitor hubs for Londoners and domestic and international tourists and as such should be protected and promoted. They include: clusters of museums such as the South Kensington museums complex; the theatres, concert halls and galleries of the Southbank/Bankside/London Bridge area; the theatres and cinemas of the West End; Wembley Stadium and Wembley Arena; Chinatown and the Soho area, the Greenwich Riverside and O2 Centre; the Olympic Park; and London's Arcadia including Kew Gardens, parks, historic buildings and landscapes between Hampton Court and Kew along the River Thames. Boroughs, in consultation with the relevant community organisations should identify these and other strategic clusters of cultural attractions in their Local Plans which often will include areas in which high populations of residents are drawn from particular cultural communities: i.e., Brick lane and environs, Ladbroke Grove area or because they have a history of being ethnically very diverse, i.e. Brixton and Shepherds Bush. The food culture of these communities is often what they are symbolised by and as such attention must be given to supporting this aspect through the creation and maintenance of food hubs and market places

7.5.12
Creative industries play an important role in London's economy and its cultural offer and as a sector, are growing at a faster rate than any other area of the economy. As part of his support for the creative industries, the Mayor is committed to working with boroughs and other relevant stakeholders to identify and set up Creative Enterprise Zones (CEZs). Setting up a CEZ can help boost the local economy of more deprived areas and support their regeneration. CEZs will support the provision of dedicated small industrial and creative workspaces and will seek to address issues of affordability and suitability of space for artists and creative businesses including those who work in the food supply industry.

7.5.13
CEZs should seek to protect, develop and deliver new spaces the creative industries need to produce, manufacture, design, rehearse and create cultural goods, as well as ancillary facilities where they can meet clients, network, share knowledge and showcase their work. Boroughs will be responsible for defining these areas in their Local Plans and developing policies to provide the workspace the industries need. This should include protecting existing workspace and encouraging new workspaces for the creative industries, ensuring that low-cost business space and affordable workspace is made available in accordance with Policy E2 Low-cost business space, Policy E3 Affordable workspace and Policy E8 Sector growth opportunities and clusters, and encouraging the temporary use of vacant buildings for creative uses, which include the output of the food supply sector.

User: TUC London, South East and East of England

Policy HC5: Supporting London’s culture and creative industries

1. We support the protection and creation of new arts, cultural and creative venues. It makes sense for clusters of such venues to be aligned with colleges, studio spaces, business enterprise hubs and home/work space.
2. London has limited space for large exhibitions, QE2 centre is relatively small, Excel Centre huge but not central and its facilities are spartan, Alexander Palace is not state of the art, nor does it have great transport links. The development of new high quality central space would need a pan London strategic lead as this is beyond the remit of any London borough. The success of such a space might depend on the parallel development of dedicated low-cost accommodation.

User: Just Space

Policy HC5 Culture and creative industries

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

Little attention is given to matters of community inclusion and participation.

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

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

Changes (to be added to the policy and text)

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

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

All requirements must be in consultation with relevant community organisations.

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

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

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

User: London Borough of Bexley

The Council welcomes **Policy HC5 Supporting London's culture and creative industries**. However, whilst the idea of meanwhile uses of vacant properties or land for cultural and creative activities are supported, **Parts A(4)** and **C(4)** will be difficult to implement. Most landlords require credible tenants and in general see the idea of pop-ups as onerous to set up for a short period of time. Ideally, a system needs to be set up that protects the landlord and their asset to enable pop up to be more effective. Business Improvement District organisations could play a role but would need support from the GLA.

The intention behind **Paragraph 7.5.7** to put on events and activities is supported, but the practicalities of putting on simple events are not always straightforward due to health and safety and licencing requirements that can put off enthusiastic organisers. Having a London-wide user-friendly event organisation pack that includes all licences and insurances, which is then tweaked for the local area, may help to encourage more local events.

User:	Federation of Small Businesses

Recognising the importance of London’s diverse creative industries is welcomed and hope that the Agent of Change principles will be applied to developments near existing creative and cultural venues. Too often much loved entertainment venues have been forced to close because of onerous restrictions have been placed on them following complaints from new residential neighbours.

FSB London is greatly concerned about the loss of independent night time venues across London and the impact this has on London as an attractive night-time destination.

User:	Federation of Small Businesses
We wholeheartedly support this measure.	

User:	Federation of Small Businesses
We wholeheartedly support this measure.	

User:	Ealing Matters

We strongly support the vision behind this policy. Our concern is that like similar policies in previous plans, no effort will be made to implement it. Instead, with the very strong drive to provide additional housing on every available site, this policy will carry no weight in practice. For example, where major proposals are referred to the Mayor where cultural or creative industries should be promoted they will not be because additional housing will be seen to be the greater priority.

User:	Rosalind Readhead

POLICY 4.8.e I support the range of London’s markets, including street, farmers’ and, where relevant, strategic markets, complementing other measures to improve their management, enhance their offer and contribute to the vitality of town centres. This must be broadened to develop the relationship between Londoners and the local food growers outside London. Helping with picking and building cultural exchanges.This is important for food security, health and well being.

User:	British Takeaway Campaign

The draft London Plan is right to recognise that the capital has a rich cultural offer, including a diverse food scene, and we welcome proposal for boroughs to support the growth and diversification of the night-time economy.

Indeed, takeaway restaurants introduce people to new cultures – a role that is particularly evident in the increasing popularity of cuisines that have not been traditional staples of the British takeaway. For example, takeaway orders from Middle Eastern and North African restaurants have increased three fold over the last three years, including a 907% increase in demand for Syrian food. This helps to bring communities together – an effect that takeaways also have through bringing people to highstreets and regenerating town centres.

User:	British Property Federation

We are fully supportive of the Mayor promoting the continued growth of London’s diverse cultural facilities and creative industries. Thriving towns and cities need a vibrant mix of places and activities and London’s cultural facilities and creative industries contribute significantly to London’s economic output.

Whilst it is for local authorities to decide the precise mix of buildings in terms of uses, the development sector plays a vital role in delivering the great places which enable London’s culture and creative industries to thrive.

User:	Business for London

Creative Enteprise Zones. The introduction of CEZs is an interesting development. CEZs can enhance the local economy and provide facilities and workspace for the creative industries, one of London's key growth sectors. They have the potential to make a valuable contribution to the future of London in a similar way to Business Improvement Districts (BIDs). The Mayor should encourage the cross-fertilisation of ideas and good practice from BIDs to CEZs.

User: AEG Europe

Setting a Cultural Context for London

7 There are two areas where the Plan needs to be developed further to make sure that full use is made of existing cultural and entertainment infrastructure, and to make sensible provision across London for the development of new facilities.

A New Cultural Quarter for Greenwich

8 AEG will be working with the Royal Borough of Greenwich, others involved in the regeneration of the Greenwich Peninsula, and the wider community to consolidate and build upon the changes that have been made to the area. Since 2004 AEG has committed significant capital and effort to delivering cultural assets on the Greenwich Peninsula – The O2 Arena, the Indigo Music Club, event spaces, major events and festivals, and exhibition spaces. This is complemented by the investment of others such as the Intercontinental Hotel, attracted by the success of The O2, who operate the UK's largest ballroom and host numerous events.

9 The aim is to designate The O2, other facilities on the Greenwich Peninsula and the wider attractions in and around Greenwich town centre as a Cultural Quarter. This reflects the recognition in paragraph 7.5.11 of the Draft London Plan of Greenwich Riverside and The O2 as a strategic cluster of cultural attractions. As suggested in the draft London Plan, the partnership will work to seek synergies with schools and higher educational establishments in the area. The London Plan should recognise the proposed Cultural Quarter.

User: AEG Europe

7 There are two areas where the Plan needs to be developed further to make sure that full use is made of existing cultural and entertainment infrastructure, and to make sensible provision across London for the development of new facilities.

Providing a Focus for Wembley

10 Wembley is continuing to develop as a leisure and cultural destination. It has a long history as a focus for football and sport, and the SSE Arena, Wembley (which is managed by AEG) offers a range of cultural events. The appeal of both Wembley Stadium and the Arena is being broadened, and Brent Council have aspirations for further change in the area.

11 Like Greenwich Riverside and The O2, Wembley Stadium and the SSE Arena are recognised in the London Plan as being one of London's strategic clusters of cultural attractions. AEG agrees with this and believes that the Plan should recognise the further contribution that Wembley could make to diversifying the location and enhancing the diversity of cultural facilities in this part of London. This would be consistent with, and would develop, Policy HC5 which notes the contribution that cultural investment can make in Opportunity Areas.

User: AEG Europe

A Spatial Strategy for New Entertainment Provision in London

12 Entertainment is at the heart of the night time economy and a major contributor to London's economy. The new draft London Plan seeks to support cultural hotspots and to protect London’s venues but we think it needs to go further.

13 The location of new entertainment venues is important. They need to be planned and sited where they complement rather than conflict with existing infrastructure. They should be located where they can, in tandem with existing facilities, enhance accessibility for both Londoners and those visiting London from outside. They should be used as an engine of growth and change, much in the way that the redevelopment of the Dome (as it was) acted as a landmark and catalyst for change on the Greenwich Peninsula.

14 Obviously, AEG is aware of the proposal by Madison Square Garden for a new arena at Stratford. AEG agrees that there would be benefits to the public if there are new venues in London, provided that they are in the right places. AEG is concerned that a new arena at Stratford will put excessive development on the Greenwich Peninsula) and will fundamentally imbalance the location of major venues in London.

15 At the moment there is no adequate strategic policy framework for balancing the competing and significant demands of major facilities and Policy HC5 should be expanded to address this. One approach would be to develop a "cultural hierarchy" in the Plan that would, in time, take into account the future Cultural Quarters and would require the effects of new facilities on identified locations to be properly assessed. The supporting text around paragraph 7.5.10 would then be amplified to set out the factors that would need to be considered.

16 The London Plan should also set a strategy for additional major new venues in London, choosing the best location for a new venue. London as a whole should be concerned about ensuring that the benefits of such an investment are, as at Greenwich, harnessed to underpin regeneration. The O2 has acted as the anchor for the redevelopment of the Greenwich Peninsula which will deliver in excess of 15,000 residential units, together with retail floorspace, schools and green infrastructure. The location of the next major venue should be chosen to have a similar catalytic effect. As noted above, the draft London Plan mentions the benefits of major entertainment and cultural development and emphasises the contribution that can be made with new Cultural Quarters in Opportunity Areas, but it does not take the obvious next strategic step of looking at the most appropriate locations for new development.

17 The choice of the location for the next major venue in London, which is likely to be the only one for the next two decades, should be properly planned. The ability to strategically assess and plan the most appropriate location for a new venue should not be usurped by opportunistic planning applications.

18 As you might expect AEG has already considered a range of alternative sites in London. There are obvious candidates, including Earls Court and Old Oak Common, where the development of a new arena could easily be the catalyst for and support further development in the area. In the case of Old Oak Common, a new arena could be used to provide a vibrant heart to the emerging development, creating jobs, generating revenue to local businesses and attracting a broad range of people to an area at the moment little known to many Londoners.

19 AEG has prepared baseline information on potential arena opportunities around London, looking at key criteria including:

(a) land availability;

(b) capacity;

(c) connectivity; and

(d) spatial distribution.

20 AEG would be happy to share this information with the GLA. We would also be happy to host a workshop, jointly with RB Greenwich and with interested local authorities, on the benefits of a properly integrated new arena if it is properly planned, integrated and supported. Some of the lessons from the way in which the Greenwich Peninsula has been developed could help the GLA plan and manage the delivery of London's next arena..

User:	Brixton Society

Paragraph 7.5.3 states that ‘creative businesses and artists also struggle to find workspace and secure long-term financing and business support as their activities are perceived to be ‘risky’ or of non-commercial value.’

This may be factually true but the policy positions drawn from it must be reviewed as they may have counter-productive outcomes, for the reasons outlined with respect to Policy E2.

User:	Silvertown Homes
Paragraph 7.5.3 states that ‘creative businesses and artists also struggle to find workspace and secure long-term financing and business support as their activities are perceived to be ‘risky’ or of non-commercial value.’ This may be factually true but the policy positions drawn from it must be reviewed as they may have counter-productive outcomes, for the reasons outlined with respect to Policy E2.	

User:	Silvertown Homes
Paragraph 7.5.5 states that ‘where possible, boroughs should protect such cultural facilities and uses, particularly those with an evening or night-time use, and support nominations to designate them as Assets of Community Value.’ A similar statement appears at paragraph 5.1.4. This statement must be revisited. When considering whether or not to designate an ACV a local authority is performing a duty set out in Section 88 of the Localism Act 2011. It is not appropriate for a local authority to have pre-judged its opinion in this way.	

User: Silvertown Homes

Paragraph 7.5.12 of the draft London Plan states that:
‘As part of his support for the creative industries, the Mayor is committed to working with boroughs and other relevant stakeholders to identify and set up Creative Enterprise Zones (CEZs). Setting up a CEZ can help boost the local economy of more deprived areas and support their regeneration.’
Creative Enterprise Zones are not defined in the draft London Plan (e.g. in the Glossary).

If the London Plan is to include this statement then it must be justified. No evidence is provided that producing differentiated planning policies for Creative Enterprise Zones will boost the local economy of more deprived areas and support their regeneration.

Indeed, two policies referring to Creative Enterprise Zones are explicitly negative in intent (Policy HC7 Protecting Public Houses and Policy E3 Affordable workspace).

It is crucial that the London Plan can demonstrate that benefits will be enjoyed by all Londoners and not for example just those who have the particular privilege of being able to access such lower cost workspace.

In imposing such restrictions the London Plan must be able to rebut counter-arguments against them. For example, a reasonable counter-argument is that by peculiarly influencing investment decisions in a Creative Enterprise Zone the London Plan may mean such parts of London undergo relative decline and/or development is simply not brought forward at all (including that which would help address the housing crisis).

User:	University College London

Policy HC5 Supporting London's culture and creative industries

UCL supports the growth and protection of London's diverse cultural facilities and creative industries, as these will likely be of interest to its staff and students. UCL also recognises the positive role that Creative Enterprise Zones play in contributing to these targets.

User:	Here East

Here East considers the CEZ allocation to be a more appropriate site allocation for Here East when compared to the existing Strategic Infrastructure Land designation.

However, the role of CEZ allocations is not well defined and further information in how these will be delivered needs to be included within the Plan.

Indeed, CEZs should not just be limited to supporting small companies and low cost business space – it is important that the opportunity for small businesses to work alongside large companies is also reflected. Policy HC5 needs to incorporate a recognition that creativity and innovation is truly achieved when there is a mix of companies at different scales, able to work together and collaborate.

User:	Vital OKR

Policy HC5 regarding supporting London's culture and creative industries, should have its section B about CEZs rephrased to state that Boroughs are encouraged to work with the Mayor and relevant stakeholders, and they should identify Creative Enterprise Zones in Local Plans. So, it should be a requirement for boroughs to designate CAZs and define appropriate policies, not something they can choose not to do.

User: CFGN Community Food Growers Network

The Community Food Growers Network supports the following comments drafted by the Reclaim Our Spaces coalition, in reference to:

#1 Helps produce a shift in thinking so that access to and the value of community spaces is not based on business plans and income generation but on the social value of the community space and its contribution to health and wellbeing, inclusion, integration, empowerment and poverty reduction.

#2 Recognises the irreplaceability and uniqueness of many community spaces and looking after them for future generations is part of a continuing legacy.

#3 Values and resources community-centred knowledge and creativity for the contribution this can make to policy discussions and a whole system approach to community engagement across the GLA

#4 Recognises that community spaces are not just physical buildings, but social spaces where cultural expression takes place. These social spaces provide movement and interaction between different cultures and it is important they are integrated as well as truly accessible to all.

#5 Recognises that community spaces are essential to the achievement of lifetime neighbourhoods in which housing, health and education facilities, shops and other local amenities are affordable and accessible to everyone, now and for future generations, and there is support for community networks based on social co-operation and mutual aid.

#6 Recognises that housing estates provide a wide range of community spaces – community halls, open spaces, playgrounds and other facilities – which must be protected

User: London Borough of Newham

Policy HC5 Support London's Cultural and Creative Industries

LBN supports the plans for enhancement and development of culture and creative industries as a key sector for economic growth and jobs for residents. The borough has a significant established creative cluster in Stratford with Theatre Royal Stratford, Stratford Circus, which is expanding with other creative organisations choosing to locate in the Queen Elizabeth Olympic Park. In addition, Newham is progressing development of creative and cultural offer in the Royal Docks Enterprise Zone including Canning Town and Custom House and areas adjacent. The borough has identified need for affordable and low cost workspace and has built into current and future regeneration projects meanwhile and long term creative offer. LBN agrees that a broad diverse cultural offer is key to ensuring cohesive and asset to the community for all residents.

Notwithstanding the above, it is structurally unhelpful for this policy to be divorced from the Economy chapter. In addition, A:5 seems out of kilter with A1 – such venues should be in town centres or at least locations that are highly accessible by public transport.

User: Exhibition Road Cultural Group

HC5 Supporting London's culture and creative industries

We welcome this policy to support the continued growth and evolution of London's diverse cultural facilities and creative industries. In particular, the protection and promotion of London's strategic clusters of cultural attractions, including the South Kensington Museums complex.

User:	Exhibition Road Cultural Group
We welcome the recognition **(para 7.5.1)** that the public realm can provide an important setting for arts and cultural activities and would like to work with the local Boroughs, GLA and local community to develop an appropriate programme of activity in Exhibition Road.	

User: CFGN Community Food Growers Network

From HC5
The entirety of this can be rewritten substituting land/land based resources/production for where reference is made to cultural facility and creative industry

HC5

A. The continued growth and evolution of London's diverse cultural facilities, food production, supply and creative industries is supported. In Local Plans and through planning decisions, boroughs should:

1. protect existing cultural and food supplying venues, spaces and facilities and uses where appropriate and support the development of new cultural and food supply venues and spaces in town centres and places with good public transport connectivity

2. identify and promote new, or enhance existing, locally-distinct clusters of cultural facilities, food supply spaces, venues and related uses defined as Cultural Quarters or food hubs, especially where they can provide an anchor for local regeneration and town centre renewal

3. identify, protect and enhance strategic clusters of cultural attractions and food supply hubs

4. consider the use of vacant properties and land for pop-ups or meanwhile uses for cultural, food supply and creative activities during the day and at night-time to stimulate vibrancy and viability and promote diversity in town centres, Cultural Quarters and other areas

5. seek to ensure that Opportunity Areas and large-scale mixed-use developments include new cultural venues, food supply hubs and/or facilities and spaces for outdoor cultural events.

B. Boroughs are encouraged to work with the Mayor and relevant stakeholders to identify Creative Enterprise and Zones and Food Supply Hubs in Local Plans:

1. in areas that have emerging or existing clusters of creative industries and food hubs or

2. in areas of identified demand and more deprived areas where there is evidence that the designation of a Creative Enterprise Zone or Food Hub will enhance the local economy and provide facilities and workspace for the creative and food related industries.

C. Where a Creative Enterprise Zone/Food Hub has been identified, Local Plan policies should:

1. develop, enhance, protect and manage new and existing creative workspace, food growing/market spaces providing flexibility for changing business needs, and an attractive business environment including related ancillary facilities

2. support existing, and the development of new, cultural venues and food supply centres within the Creative Enterprise Zone/Food Hub

3. help deliver spaces that are suitable, attractive and affordable for the creative industries, taking into account the particular requirements of established and emerging creative businesses, economic and health promoting businesses in the Creative Enterprise Zone/Food Hub in accordance with Policy E2 Low-cost business space, Policy E4 Land for industry, logistics and services to support London's economic function and Policy E8 Sector growth opportunities and clusters

4. encourage the temporary use of vacant buildings and sites for creative workspace and associated activities

5. integrate public transport, digital and other infrastructure and service provision such as leisure, recreation and community facilities in the establishment and development of the Creative Enterprise Zone/Food Hub

6. support a mix of uses which derive mutual benefits from, and do not compromise, the creative industries and cultural facilities in the Creative Enterprise Zone/Food Hub in line with the Agent of Change principle (see Policy D12 Agent of Change)

7. contribute to the achievement of wider objectives for the business location such as the economic vitality and diversity of a town centre or the intensification of an industrial area.

London’s rich cultural offer includes visual and performing arts, music, spectator sports, festivals and carnivals, pop-ups and street markets, and a diverse and innovative food scene, which is important for London’s cultural tourism. The capital’s cultural offer is often informed, supported and

influenced by the work of the creative industries such as advertising, architecture, design, fashion, publishing, television, video games, radio and film. It is also informed by a historical legacy of Britain’s diverse communities, their lifestyles, culture and faiths, including , importantly, their food culture. Cultural facilities and venues include premises for cultural production and consumption such as performing and visual arts studios, creative industries workspace, museums, theatres, cinemas, libraries, and music and fresh and prepared food outlets and other entertainment venues, including pubs and night clubs. This also includes venues in which London’s diverse communities celebrate their cultural calendars, births, weddings and deaths and hold community meetings to foster social cohesion, integration and well-being. Although primarily serving other functions, the public realm, parks, skate-parks and sports venues can provide important settings for a wide range of arts and cultural activities.

7.5.2
London’s culture sector and the creative industries deliver both economic and social benefits for the capital. In 2015, the Gross Value Added (GVA) of the creative industries in London was estimated at £42 billion, accounting for just under half of the UK total from these industries, and contributing 11.1 per cent to London’s total GVA. Cultural tourism supported 80,000 jobs and contributed £3.2 billion of GVA to London in 2013, just under a third of the overall contribution from the tourism sector as a whole. As well as being one of London’s most dynamic sectors, culture also plays a role in building strong communities, increasing healthy life outcomes and generating civic pride. The more obvious of this sector revolves around the cultural production, supply and consumption of food.

7.5.3
Despite this positive general picture, London’s competitive land market means that the industry is struggling to find sufficient venues to grow and thrive, and is losing essential spaces and venues for cultural production and consumption including restaurants, cafes, meeting spaces, theatres, pubs, clubs and music venues. Creative businesses, community leadership and artists also struggle to find workspace and secure long-term financing and business support as their activities are perceived to be ‘risky’ or of non-commercial value.

7.5.4
Boroughs are encouraged to develop an understanding of the existing cultural offer in their areas, evaluate what is unique or important to residents, workers and visitors and develop policies to protect those cultural assets. Boroughs should draw on the Mayor's forthcoming Cultural Infrastructure Plan to assess and develop their cultural offer. Boroughs should also consider how the cultural offer serves different groups of people (such as young people, BAME groups and the LGBT+ community), and where the cultural offer is lacking for particular groups. Boroughs should, in consultation with the relevant community organisations, put in place policies and strategies to ensure that cultural facilities catering for such groups and communities are protected, especially facilities that are used in the evening and night time and at weekends.

7.5.5
The loss of cultural venues, facilities or spaces can have a detrimental effect on an area, particularly when they serve a local community function. Where possible, boroughs should protect such cultural facilities and uses, particularly those with an evening, night-time or weekend use, and support nominations to designate them as Assets of Community Value. Where a development proposal leads to the loss of a venue or facility, boroughs must consider requiring the replacement of that facility or use.

7.5.6
Boroughs are also encouraged to support opportunities to use vacant buildings and land for flexible and temporary 'meanwhile uses' or 'pop-ups' especially for alternative cultural day, night-time and weekend uses. The use of temporary buildings and spaces for cultural and creative uses can help stimulate vibrancy, vitality and viability in town centres by creating social, cultural and economic value from vacant properties. Meanwhile uses can also help prevent blight in town centres and reduce the risk of arson, fly tipping and vandalism. The benefits of meanwhile use also include short-term affordable accommodation for SMEs and individuals, generating a short-term source of revenue for the local economy and providing new and interesting shops, cultural and other events and spaces, which can attract longer-term business investment. Parameters for any meanwhile use, particularly its longevity and associated obligations, should be established from the outset and agreed by all parties after thorough consultation with community organisations.

7.5.7
Events and activities such as festivals, seasonal markets, exhibitions, performances, outdoor concerts and busking are not always dependent on using a dedicated cultural facility or venue and can make use of a range of outdoor spaces including streets, parks and other public areas. These types of activities, which are often free, offer a way for everyone to experience and participate in London's rich cultural life. The opportunity to incorporate these uses should be identified and facilitated through careful design. However, the lack of community spaces in which to plan and organise many of these outdoor 'free' events might mean they disappear entirely or are poorly planned and resourced. For this reason and the fact that they make an important contribution to the economy of particular boroughs and the capital, Councils must support community spaces and food hubs which may play an important role in enabling these events and activities.

7.5.8
As well as protecting existing venues and facilities, boroughs should also work with a range of partners, especially community organisations and cultures which often are excluded, to develop and promote clusters of cultural activities and related uses and define them in their Local Plan. A successful Cultural Quarter should build on the existing cultural character of an area and encourage a mix of uses, including cafés, restaurants and bars alongside cultural assets and facilities, to support the coherence, integration and survival of diverse communities, attract visitors and generate interest. A Cultural Quarter can be used to form the basis for sustained cultural activity but may also include temporary activities and uses such as festivals, markets, exhibitions, performances and other cultural events.

7.5.9
Where appropriate, boroughs should use Cultural Quarters to seek synergies between cultural provision, schools, and higher and further education which can be used to nurture a more cohesive and integrated community sector, be the basis of diverse and varied economic activity, enable neighbourhoods to be more attractive and pleasant places to live, encourage volunteering, new talent and audiences. This can include partnerships with a range of cultural organisations, such as community cultural organisations, libraries, museums, galleries, music venues, dance studios, and theatres.

7.5.10
Boroughs, in consultation with diverse community organisations, should maximise opportunities for developing Cultural Quarters in Opportunity Areas, other Areas for Regeneration and large-scale developments. The inclusion of new cultural venues, hubs and facilities can assist with place-making, the creation and establishment of lifetime neighbourhoods, creating an attractive and vibrant area for residents, workers and visitors, as well as helping to form the character and distinctiveness of a new place.

7.5.11
London is internationally-renowned for its historic environment and culturally diverse institutions, which are major visitor attractions as well as making an enormous contribution to the capital's culture and heritage. There are many areas in London which are rich in cultural heritage and have a unique cultural offer. These act as key visitor hubs for Londoners and domestic and international tourists and as such should be protected and promoted. They include: clusters of museums such as the South Kensington museums complex; the theatres, concert halls and galleries of the Southbank/Bankside/London Bridge area; the theatres and cinemas of the West End; Wembley Stadium and Wembley Arena; Chinatown and the Soho area, the Greenwich Riverside and O2 Centre; the Olympic Park; and London's Arcadia including Kew Gardens, parks, historic buildings and landscapes between Hampton Court and Kew along the River Thames. Boroughs, in consultation with the relevant community organisations should identify these and other strategic clusters of cultural attractions in their Local Plans which often will include areas in which high populations of residents are drawn from particular cultural communities: ie, Brick lane and environs, Ladbroke Grove area or because they have a history of being ethnically very diverse, ie Brixton and Shepherds Bush. The food culture of these communities is often what they are symbolised by and as such attention must be given to supporting this aspect through the creation and maintenance of food hubs and market places

7.5.12
Creative industries play an important role in London's economy and its cultural offer and as a sector, are growing at a faster rate than any other area of the economy. As part of his support for the creative industries, the Mayor is committed to working with boroughs and other relevant stakeholders to identify and set up Creative Enterprise Zones (CEZs). Setting up a CEZ can help boost the local economy of more deprived areas and support their regeneration. CEZs will support the provision of dedicated small industrial and creative workspaces and will seek to address issues of affordability and suitability of space for artists and creative businesses including those who work in the food supply industry.

7.5.13
CEZs should seek to protect, develop and deliver new spaces the creative industries need to produce, manufacture, design, rehearse and create cultural goods, as well as ancillary facilities where they can meet clients, network, share knowledge and showcase their work. Boroughs will be responsible for defining these areas in their Local Plans and developing policies to provide the workspace the industries need. This should include protecting existing workspace and encouraging new workspaces for the creative industries, ensuring that low-cost business space and affordable workspace is made available in accordance with Policy E2 Low-cost business space, Policy E3 Affordable workspace and Policy E8 Sector growth opportunities and clusters, and encouraging the temporary use of vacant buildings for creative uses, which include the output of the food supply sector.

User:	Footwork Architects Limited

- Strengthen local planning protection for smaller industrial, cultural workspaces and pubs

User:	London Borough of Ealing

The Council supports this new policy.

Reference is made to Assets of Community Value (Para 7.5.5). Whilst there is no objection in principle to boroughs being ‘encouraged’ to support nominations, it should be noted that this is subject to a separate process under the Localism Act.

User: Middlesex University

Middlesex University London welcomes the prominence given to the management and curation of cultural assets in the Plan. Universities are part of that asset base and play a central role in helping to make London a vibrant place to live, work and invest. This is the case in the outer London boroughs as well as in the CAZ. Alongside provision for students in the arts and creative industries, many universities offer cultural activities to their local communities bringing people together, enhancing wellbeing and quality of life.

Middlesex University London welcomes the recognition in the plan of the important role of the creative industries in London's economy. In particular, the call on boroughs to support cultural facilities and venues, especially where they can provide an anchor for local regeneration and town centres, aligns with the University's own work to make the industry standard facilities and cultural activities of its Faculty of Arts and Creative Industries more accessible to the local community. The proposed Creative Enterprise Zones (CEZs) are also a welcome initiative and Middlesex is keen to work with the Mayor and local boroughs to engage both our Arts and Creative Industries and Science and Technology Faculties in this agenda.

User:	Natural England

We welcome the inclusion of space for cultural events. **We recommend** these be included in strategic green infrastructure plans.

Meanwhile spaces can also be ‘greened’ to provide a pleasant accessible open space where events can take place.

User: Friary Park Preservation Group

Policy HC5

Supporting London's culture and creative industries should have something about help to local community groups. Far too many policies sound impressive but are merely aspirational and easily dismissed by a determined developer.

User:	University of London

We note that Policy HC5 (Supporting London’s culture and creative industries) Section B suggests that “Boroughs are encouraged to work with the Mayor and relevant stakeholders to identify Creative Enterprise Zones in Local Plans”.

We again feel that a specific commitment to University Enterprise Zones, or a similar initiative, could also be integrated into the development of Borough Local Plans.

User: Historic England

In part A5) It would be appropriate to refer to making use of existing historic cultural assets: for instance, redundant churches or cinemas.

It is often heritage buildings and historic uses which provide the character to town centres and ex-industrial areas boosting their potential for successful regeneration. Policy HC5 part C could make this link to highlight the complementary nature of heritage and cultural activity.

We recommend:

- in part A5), amend as follows: '... and spaces for outdoor cultural events **and make use of existing historic cultural assets'**

in part C4) amend to ' encourage the temporary use of vacant buildings and sites for creative workspace and activities, **including the beneficial re-use of heritage assets'**

User: Redrow Homes London Division.

Comment covers Affordable Workspace and Culture

Paragraph 7.5.3 states that ‘creative businesses and artists also struggle to find workspace and secure long-term financing and business support as their activities are perceived to be ‘risky’ or of non-commercial value.’

This may be factually true but the policy positions drawn from it must be reviewed as they may have counter-productive outcomes, for the reasons outlined with respect to Policy E2.

User: Redrow Homes London Division.

Object - Culture, National Policy

Paragraph 7.5.5 states that ‘where possible, boroughs should protect such cultural facilities and uses, particularly those with an evening or night-time use, and support nominations to designate them as Assets of Community Value.’
A similar statement appears at paragraph 5.1.4.

This statement must be revisited. When considering whether or not to designate an ACV a local authority is performing a duty set out in Section 88 of the Localism Act 2011. It is not appropriate for a local authority to have pre-judged its opinion in this way.

User: Redrow Homes London Division.

Neutral - Culture, Economy

Paragraph 7.5.12 of the draft London Plan states that:
‘As part of his support for the creative industries, the Mayor is committed to working with boroughs and other relevant stakeholders to identify and set up Creative Enterprise Zones (CEZs). Setting up a CEZ can help boost the local economy of more deprived areas and support their regeneration.’
Creative Enterprise Zones are not defined in the draft London Plan (e.g. in the Glossary).

If the London Plan is to include this statement then it must be justified. No evidence is provided that producing differentiated planning policies for Creative Enterprise Zones will boost the local economy of more deprived areas and support their regeneration.

Indeed, two policies referring to Creative Enterprise Zones are explicitly negative in intent (Policy HC7 Protecting Public Houses and Policy E3 Affordable workspace).

It is crucial that the London Plan can demonstrate that benefits will be enjoyed by all Londoners and not for example just those who have the particular privilege of being able to access such lower cost workspace.

In imposing such restrictions the London Plan must be able to rebut counter-arguments against them. For example, a reasonable counter-argument is that by peculiarly influencing investment decisions in a Creative Enterprise Zone the London Plan may mean such parts of London undergo relative decline and/or development is simply not brought forward at all (including that which would help address the housing crisis).

User: Crystal Palace Football Club Ltd

Object - Culture, Sport and Recreation

The economic and social value of Premier League football, and other world-class sporting ventures, is enormously significant to the nation and the nation's capital. In draft Policy HC5, spectator sporting enterprises are thus, correctly recognised as a key part of London's "rich cultural offer" and that it is "important for London's cultural tourism" including because of their acknowledged fundamental economic and social roles.

However, Policy HC5 does not then effectively plan for the significance of such professional sporting enterprises. Whilst London's arts, culture and many entertainment facilities can be effectively clustered across "cultural quarters", the Plan needs to advocate and provide a more responsive spatial planning strategy to accommodate the particular needs of Premier League and other commercial sporting enterprises in respect of both their spectator and performance facilities and their related essential training grounds.

To effectively respond to ever increasing levels of national and international competitiveness and success, professional spectator sports, and in particular Premier and other League football clubs, require extensive training grounds to accommodate the number of pitches and facilities required to prepare professional players for matches whilst, at the same time, nurturing emerging talent. The scale of space required has to accommodate the necessary pitch rotation to ensure the maintenance of top quality playing surfaces as well as provision for a wide range of related built and other infrastructure. The protection, enhancement and provision of such sites will not be compatible with a spatial vision that puts cultural facilities into neat dense “cultural quarters” in central London. There is a need for an additional spatial dimension bearing in mind the inevitable and essential use of large tracts of green space conveniently located to the relevant stadia. Accommodating the unique requirements of such elite professional sporting enterprises, in the context of the acknowledged benefits that they bring to London, inevitably creates “very special circumstances” in the context of how and where they are to be located.
We therefore request an addition to Policy HC5 that is worded as follows:

“Sites for spectator-intensive professional sporting enterprises and their related training facilities should be protected, enhanced and provided for in response to their recognised needs and requirements having regard to the resulting cultural, social and economic benefits that ensue. Where there is a need to locate new or enhanced training facilities on green space in order to accommodate their required scale, this may constitute a very special circumstance justifying the grant of planning permission.”

User:	Cross River Partnership

This Policy is welcome. It will be essential, to maintain local discretion to determine the location and boundaries for the Quarters and Zones and the activities which they may encompass. This point could usefully be included in the Policy.

User:	Oneill Homer
HC5 Neighbourhood plans can identify and qualify local cultural venues and other assets based on local knowledge.	

User:	Unknown

Our client is fully supportive of the Mayor promoting the continued growth of London’s diverse cultural facilities and creative industries. Thriving towns and cities need a vibrant mix of places and activities and London’s cultural facilities and creative industries contribute significantly to London’s economic output.

Whilst it is for local authorities to decide the precise mix of buildings in terms of uses, the development sector plays a vital role in delivering the great places which enable London’s culture and creative industries to thrive.

User: L&Q

Creative businesses and artists access to workspace

Paragraph 7.5.3 states that ‘creative businesses and artists also struggle to find workspace and secure long-term financing and business support as their activities are perceived to be ‘risky’ or of non-commercial value.’

This may be factually true but the policy positions drawn from it must be reviewed as they may have counter-productive outcomes, for the reasons outlined above.

User: WeAreWaterloo Business Improvement District

It is acknowledged that the Draft New London Plan provides a much stronger policy position in terms of protecting and growing the City's culture and creative industries, and this approach is commended.

We Are Waterloo recognises that Policy HC5 of the Draft New London Plan seeks to support the culture and creative industries in London through the protection and enhancement of existing cultural venues and the promotion of new cultural facilities and creative industries. The policy identifies strategic clusters of cultural attractions, and defines these localities as 'Cultural Quarters'. The policy also promotes the creation of Creative Enterprise Zones to support and enhance London's cultural offer.

We Are Waterloo is in support of this proactive approach to arts and culture, and is supportive of Waterloo's inclusion within an area identified for Arts, Culture and Entertainment under figure 2.16 of the Draft New London Plan.

London's competitive land market can make it difficult for creative spaces and cultural venues to grow, or even remain, and therefore it is promising to see the Draft New London Plan offer policy support for these uses, which are socially and culturally invaluable.

User: Highams Park Planning Group

PUBLIC & COMMUNITY FACILITIES (PCF)
Development should aim to contribute to public and community facilities in the Area and bring improvements to meet the needs of the growing population (Objective 2).

It is essential that the present community infrastructure of the Area be maintained and strengthened to meet the needs of a growing and changing population. This requires that people's needs are met by the provision of the appropriate quantity, quality and accessibility of infrastructure such as educational services, health facilities, community centres, libraries, sports and leisure facilities, community spaces and meeting places, public houses, etc.

The provision of healthcare and educational facilities falls outside the scope of the powers of a Neighbourhood Plan. However, we are aware that concerns have been expressed during our consultations by local residents that there is a shortage of school places and that healthcare provision is under stress.

The Area has only one Council owned community facility: Hale End Library in Castle Avenue. This civic building is widely used and appreciated but can only provide limited support for the community's needs as it is only open for four days a week. Consideration should be given to expanding its role to link with other Council services so it can be used as a 'community hub', by extending its opening hours, possibly to seven days a week and for extended periods each day. Members of HPPG are already in active dialogue with library staff with a view to achieving this objective. Following an application by HPPG, the library was added to the Council's list of "Assets of Community Value" in September, 2016.

POLICY PCF1: Hale End Library:
Development of this site shall ensure that it maintains a wide range of public, social and community facilities to meet the needs of a diverse and growing population. This shall be achieved by ensuring that any development of the site:
i. Maintains the services and community space provided by Hale End Library at the existing level.
ii. Retains the existing number of customer car parking spaces.

Religious centres, pubs and other social areas are neighbourhood focal points for meetings, exercise classes, special interest clubs and entertainment venues. HPPG is in the process of preparing applications for the assets listed in Policies PCF2 and PCF3 to be designated as Assets of Community Value and added to the Council's list of designated assets.

User: Taylor Wimpey UK

Policy HC5 Supporting London's culture and creative industries

We welcome the continued growth and evolution of London's diverse cultural facilities and creative industries.

Part A4 of the Policy considers the use of vacant properties and land for pop-ups or meanwhile uses. Whilst such uses can stimulate vibrancy and viability on vacant sites, careful consideration must be given to ensure that the protection of such uses does not delay of prejudice the redevelopment of such sites.

Paragraph 7.5.6 & 7.6.7

The wording of this paragraph concerning meanwhile uses should be amended to reflect the above to ensure that such uses do not prejudice the redevelopment of vacant sites.

User:	Kingston First

In a changing UK high street, it is clear that town centres must provide a range of services and opportunities which support and complement its traditional function as a retail hub. Cultural venues are of increasing importance throughout the capital. The support and protection for such facilities, as set out in draft Policy HC5, is supported.

User:	London Borough of Camden

We strongly support the objectives of protecting existing cultural venues and facilities and finding suitable sites, spaces and premises to support new cultural uses. The richness of London's cultural offer is mirrored by the range and diversity in Camden, particularly represented by Camden Town and its live music scene and the West End (about a third of which is within Camden). Camden is also home to a wide range of creative industries and therefore the acknowledgement in paragraph 7.5.1 of the link between these and the cultural offer is welcomed. Camden's recently adopted Local Plan includes a policy that seeks to protect the Borough's cultural assets. We have consulted on supplementary planning guidance which provides detailed advice for applicants on how the Council will protect culture and leisure uses and highlights particular planning considerations applicable to specific types of cultural and leisure use.

User: London Borough of Camden

The text should acknowledge that a replacement facility may sometimes be a last resort once all avenues for retention of the existing premises have been exhausted. Camden's Local Plan states in paragraph 4.62 that the *"scope for re-providing cultural and leisure facilities is constrained by factors such as cultural history, including associations (e.g. with prominent people or important periods or events) or experience, where these are intrinsic to a particular premises, as well as the benefits an attraction may enjoy from being located close to other cultural and leisure uses"*.

Camden Local Plan paragraph 4.57 recognises that cultural facilities can be heritage assets and that "the civic importance of buildings, such as theatres and music venues, is often reflected by the quality of their architectural design and internal fabric and fittings". Many of Camden's cultural facilities are within listed buildings where the National Planning Policy Framework advises that "heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance" (para. 162) and *"When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation"*. We therefore suggest the following amendments to the text para 7.5.5:

"*The loss of cultural venues… Assets of Community Value. Boroughs should also consider whether alternative cultural uses would avoid, or minimise the impact on the significance of a heritage asset, including its cultural value. Where a development proposal leads to the loss of a venue or facility, and having examined the feasibility of the existing facility continuing to support a cultural use, boroughs should consider requiring the replacement of that facility or use".*

User: UCL Urban Laboratory

HC5 Supporting culture and creative industries

There must be recognition that many cultural spaces have a dual purpose: particularly licensed venues (bars and pubs) that also have a performance and that
these are vitally important cultural sites. LGBTQI+ culture is especially important in this regard as it is often developed in safe spaces away from the public and cannot be transferred easily into other venues. This cultural expression can often then move into the mainstream for the benefit of a wider audience, but the unique environment, away from the risk of social othering, is vitally important to the work's development.

HC5A
This policy was strongly supported by the participants in our consultation. LGBTQI+ venues and other spaces tend to cluster together, often for reasons of security. Consulting the LGBTQI+ community to identify and support identification and development of clusters is essential. London Boroughs must recognise and protect existing queer spaces, as well as support and promote pop-up and meanwhile uses, including new spaces in new developments, using the GLA's LGBT Venues Charter which should be specifically referred to in the London Plan.

The London Plan should itself identify and protect larger-scale or longer-lasting clusters of special significance and require boroughs to identify and protect
smaller-scale or more recent clusters. Supported by the evidence base mentioned above, these should be recognised as cultural, community and heritage assets. Such clusters benefit social infrastructure, have significance to heritage conservation and growth, and help grow the nighttime and daytime economies.

User: Ms Siobhan Mooney

#1 Help produce a shift in thinking so that access to and the value of community spaces is not based on business plans and income generation but on the social value of the community space and its contribution to health and wellbeing, inclusion, integration, empowerment and poverty reduction.

#2 Recognising the irreplaceability and uniqueness of many community spaces and looking after them for future generations is part of a continuing legacy.

#3 Valuing and resourcing community-centred knowledge and creativity for the contribution this can make to policy discussions and a whole system approach to community engagement across the GLA.

#4 Community spaces are not just physical buildings, but social spaces where cultural expression takes place. These social spaces provide movement and interaction between different cultures and it is important they are integrated as well as truly accessible to all.

#5 Community spaces are essential to the achievement of lifetime neighbourhoods in which housing, health and education facilities, shops and other local amenities are affordable and accessible to everyone, now and for future generations, and there is support for community networks based on social co-operation and mutual aid.

#6 Housing estates provide a wide range of community spaces – community halls, open spaces, playgrounds and other facilities – which must be protected and their use encouraged.

Policy HC6 Supporting the night-time economy

User:	Mrs Sarah Witney

Again the needs of outer London is not considered. We have no night buses to/ from central London & no trains past 12.30am. it is clear that the plan regards Outer London as a dumping ground for excess people and nothing more.

User: Police Crime Prevention Initiatives Limited

Policy HC6 Supporting the night-time economy:

“A Boroughs should develop a vision for the night-time economy, supporting its growth and diversification, in particular within strategic areas of night-time activity (see Table A1.1 and Figure 7.7), building on the Mayor’s Vision for London as a 24-Hour City.

B In Development Plans, town centre strategies and planning decisions, boroughs should:

1) promote the night-time economy, where appropriate, particularly in the Central Activities Zone, strategic areas of night-time activity, town centres, and where public transport such as the Night Tube and Night Buses are available

2) improve inclusive access and safety, and make the public realm welcoming for all night-time economy users and workers.

3) diversify the range of night-time activities, including extending the opening hours of existing daytime facilities such as shops, cafés, libraries, galleries and museums

4) address the cumulative impact of high concentrations of licensed premises and their impact on anti-social behaviour, noise pollution, health and wellbeing and other impacts for residents, and seek ways to diversify and manage these areas

5) ensure night-time economy venues are well-served with safe and convenient night-time transport 6) protect and support evening and night-time cultural venues such as pubs, night clubs, theatres, cinemas, music and other arts venues.

C Promoting management of the night-time economy through an integrated approach to planning and licensing, out-of-hours servicing and deliveries, safety and security, and environmental and cleansing services should be supported. Boroughs should work closely with stakeholders such as the police, local businesses, patrons, workers and residents.”

Secured by Design are committed to collaborative working with a range of partners including Planning, Community Safety and Licensing Professionals to promote safety and security in the night time economy and a new design guide for Licensed Premises is currently being produced.

7.6.1” The night-time economy refers to all economic activity taking place between the hours of 6pm and 6am. Night-time economic activities include eating, drinking, entertainment, shopping and spectator sports, as well as hospitality, cleaning, wholesale and distribution, transport and medical services, which employ a large number of night-time workers.”

The hours of the night time economy are relevant when “Designing out Crime and ASB” and applies equally in other areas of the plan, including design, layout and travel.

Early consideration and implementation of SBD principles at design stage, can mitigate many of the potential issues created by the night time economy and associated travel.

7.6.6 “There are many benefits to promoting night-time economic activity such as generating jobs, improving income from leisure and tourism, and making town centres safer by increasing activity and providing passive surveillance. Managing issues such as transport, increased noise, crime, anti-social behaviour, perceptions of safety, the quality of the street environment……”

As in Policy D1(8) above; Secured by Design principles can be integrated at design stage to encourage and facilitate safe and crime free active travel, through the provision of safe and secure infrastructure and legible entrances to buildings, that are well lit and aligned with peoples’ movement patterns and desire lines in the area”.

“Routes for pedestrian, cyclists and vehicles should be integrated to provide a network of supervised areas to reduce crime and anti-social behaviour.” SBD - Homes:2016 Section 1:8.6.

User:	Dr Robert Gurd

We generally support the idea of diversifying the night-time economy away from licensed premises. However, we do not consider sufficient attention has been given to the impact of the night-time economy upon local residents and, in particular, the cumulative impact of such premises in town centres where residential areas can encroach into the centre of towns (e.g. as in central Ealing). Protection for such residents should be enhanced.

User:	London Forum of Amenity and Civic Societies

The London Forum **supports** this policy, and welcomes the emphasis on managing these activities.

Paragraph 7.6.6 stresses the development of management strategies. That paragraph should have an additional sentence ‘Boroughs, working with their local night time economy sector, should seek accreditation through ATCM’s Purple Flag scheme.’

In **paragraph 7.6.7** the following words should be placed after “museums” ‘providing it did not require entrance fees that would discriminate against those on low incomes.’

User: Love Wimbledon BID

We are very supportive of these proposals, particulalry the possibility of os using outside paces including the public realm - however once again the cheek by jowl proposal of intensifying residential in town centres will negate this policy

BIDs work hard to encourage a strong NTE within a location, hosting pubwatch meetings, setting up dispersal policies and cleansing policies for the late night venues, however the resident backlash seems to have an ever growing stronger voice leading to constrining cumulative impact zones that lose all rationale of the type of premises and conditions on the license.

User: London Assembly Green Party Group

I welcome the inclusion of this new policy, which takes a strategic approach to developing the future night-time economy of London.

The night-time economy is a key driver of London's economic and cultural activity, employing hundreds of thousands of people and contributing around £5 billion to London's economy each year.

To improve this policy further, I support the following comments and changes that have been put forward by the London Assembly:

Policy HC6 A A strategic overview will be vital to ensure coherence across London's NTE as it develops.

Policy HC6 B should be a requirement for boroughs to consider a dedicated space to regularly showcase and celebrate new artists and musicians.

Policy HC6 B inclusive access and safety. To consider the option for developing a 'gold standard' for easy access for disabled people for how venues and events are managed and run.

Policy HC6B diversify the range of night-time activities. For instance exhibitions spread around the town centre to encourage visitors to explore the area beyond their original destination and hopefully encounter new businesses along the way.

Policy HC6B protect and support evening and night-time cultural venues. Dedicated “anchor venues” are needed, to regularly showcase and celebrate new artists and musicians. But finding such spaces may well be an issue for many boroughs as music venues continue to decline. GLA estimates indicate that 40 per cent of music venues have been lost across London since 2007. The Committee heard that in Croydon, for example, there is no such space, although some capacity is provided through Boxpark Croydon.

Rewrite the night: the future of London’s night-time economy. Assembly Economy Committee report, Feb 2018
https://www.london.gov.uk/sites/default/files/rewrite_the_night_final.pdf

User: London Ambulance Service

We welcome proposals in the London Plan to diversify the range of night-time activities, particularly plans to focus on activities that do not involve alcohol consumption. Alcohol misuse in London creates additional demand for our services and diverts resources from other patients. It can also impact on our staff, affecting morale and can be linked to assaults on staff. Alcohol related calls are often categorised highly due to the associated level of consciousness, this subsequently triggers a short response time and by tying up resource impacts on our ability to attend lower priority but clinically vulnerable patients.

In a survey we conducted with staff last year almost two thirds of medics who responded to the questionnaire reported treating someone under the influence of alcohol at least once every 12-hour shift. Over 95 per cent of those surveyed (269 staff members) claimed to have been verbally abused by a drunk patient, at least once whilst on duty. This not only impacts on our staff's ability to do their job but can also impact on our ability to retain staff.

We proactively encourage people to drink responsible throughout the year, particularly during key events, such as Notting Hill Carnival and New Year's Eve. We have run several alcohol campaigns, working in the past with the GLA to encourage people to Eat, Drink and Be Safe. We have found that encouraging people to drink responsibly is not as effective as highlighting the consequences of drinking too much, particularly the impact on other patients at a time when there is high demand on NHS services.

Westminster is the busiest borough for alcohol related calls and we are working with Westminster Council on their Nightsafe Project. The Nightsafe project includes a Hub, which would enable vulnerable people to go to a place where they can recover and receive assistance in getting home. It also includes ambassadors who will assist visitors and support people who are vulnerable due to intoxication. We are working with Westminster Council to look at how we can support the project.

User: Aviva Investors

Aviva Investors is a longstanding stakeholder and investor in the Royal Borough of Kingston upon Thames. It owns and operates the Bentall Centre and its associated multi-storey car parks, the Seven Kings car park and a collection of other smaller retail properties in the Kingston town centre.

Planning policy is very important to Aviva Investors as it can provide greater certainty in the planning and implementation of future investment.

Aviva Investors support Policy HC6, particularly the recognition at part (A) that boroughs should develop a vision for the night-time economy, supporting its growth and diversification, building on the Mayor's Vision for London as a 24-Hour City. Aviva Investors support the clarification provided in paragraph 7.6.1 that "*the night-time economy refers to all economic activity taking place between the hours of 6pm and 6am…",* which include eating, drinking, entertainment, shopping and spectator sports.

It is stated at paragraph 7.6.2 that *"The night-time economy is becoming increasingly important to London's economy"*. Aviva Investors endorse this statement. Leisure expenditure including eating and drinking away from the home is projected to grow, alongside retail, and over recent years there has been significant investment in this sector, particularly in the development of cinema with food and beverage outlets, with many such developments proposed in town centres. This provides for a more experiential 'day out' visit, which in turn increases visitor dwell time and supports a strong evening economy. Experian forecast that leisure expenditure will increase on average by 1.4% per annum, a total increase of 23% between 2016 and 2031 over and above inflation therefore established development trends will continue.

Non-retail service and leisure uses increasingly perform a vitally important role in the overall offer of a centre, and encourage customers to visit centres. Food and beverage is a fast-moving and creative sector, with a steady flow of new concepts emerging. National chains have sought to increase their geographical coverage. These types of operators (Class A3, A4 and A5) i.e. restaurants, bars and pubs have supported other major leisure uses, in particular cinema developments.

User:	The Federation of City Farms and Community Gardens
Outdoor nighttime spaces should include biodiverse gardens and spaces. People should feel comfortable in nature at night, not see it as threatening.	

User: London Borough of Hammersmith and Fulham

Policy HC6 Supporting the night-time economy

We support the ambition of this policy to promote the growth and diversification of the night time economy. London is an extremely vibrant city, with world-class entertainment, restaurants, and nightlife covering a variety of locations and addressing a wide selection of audiences. The existing night time economy is thriving and the introduction of the night tube has ensured that both Londoners and visitors alike can enjoy the city for longer at the weekend and have a relatively secure mode of transportation.

Late night public transport should be extended and the frequency improved to facilitate safer and more attractive night time activity.

All night and late-night stores are increasing across the capital, addressing changing consumer and working habits together with flexible lifestyles. Twenty-four hour businesses should be to the benefit of the local community, and not a nuisance. As such, the mayor should ensure there is a market demand for this and that any changes reflect the feel of the local community and their wishes. We should also work to improve existing opening/operating times.

User: Association of Licensed Multiple Retailers

UKHospitality thoroughly endorses the Plan's supportive statements relating to the night time econoomy. For reasons expounded elsewhere in this response, it is important for businesses that operate at different times of the day to support and effectively extend each other's trading hours.

The customer would not be the only beneficiary of the Plan's fruition, though: businesses can only operate in our worker-intensive sector if people are able to get to and from work. The importance of transport at night is well embedded in the Plan, and rightly so. The introduction of the night tube has helped many venues to thrive, and for many people to work at times which were previously difficult due to limited travel.

Research company CACI estimated that if customers stay in a venue for one extra drink, it adds £78m to the London economy each year.

User: Publica

In many ways, the night time economy can be seen as a broad term, embracing not only entertainment and leisure, as implied by the term “nightlife”, but other employment types that work at night, however it tends to focus exclusively on the transactional. It would be a very partial picture if London during the day were described by its economic activities alone, omitting its streets, monuments, and atmosphere. We believe that in fact, the focus of the Night Time Commission should be on the experience of London at night, encompassing a much broader scope, that considers all activity from 6pm to 6am, with consideration of how this interacts with the evening and early morning. This focus should include consideration of the intangible and experiential aspects of London, and can also be an opportunity for London to think carefully about its night time identity.

User:	Publica
Publica finds the focus on inclusive and non-alcohol-based night life a positive step, and we welcome the effort to widen the offer available to Londoners and encourage a broader mix of uses.	

User: Publica

Publica supports the Mayor's consideration of the public realm at night - this is a key issue affecting many people's enjoyment of the night time and should be a priority element of the move towards a 24-hour city. Whether people are using the public realm itself, or moving through it for work or leisure, it should be safe, accessible, and reflect the daytime character of the area.

A key barrier to London's night time public realm is safety, or the perception of safety.
Lengthening the animated hours of an area through the encouragement and introduction of new activities can increase safety through passive observation; by inviting people to dwell in the area later in the evening, those travelling through can be confident that there are ‘eyes on the street’ at night.

Active, lit frontages can contribute to a sense of improved safety and surveillance, but a public realm that continues to hold activity can best improve comfort and safety, as well as encouraging the use of active travel over taxis, private hire or public transport. Publica’s work on Oxford Street has shown how critical this latter surveillance is in areas dominated by retail uses; currently, there are only two units open late at night between Marble Arch and Oxford Circus, which can give rise to a feeling of emptiness, darkness and insecurity. Animating the public realm and introducing evening and late night activities is an important strategy for the Oxford Street district, and could provide useful lessons for other cultural quarters and retail destinations.

User:	Publica

We strongly support the growth of a wider range of activities taking place at night, although note that due to London's diverse mix of uses, there is a need to balance servicing and freight needs with other night time activities, such as bars and clubs. This is evident on Oxford Street, where the proposed pedestrianisation will create a new public realm, but may create difficulties for servicing shops and ensuring they are able to make deliveries as frequently as their customers require. This will require a joined up approach across a number of stakeholders, led by boroughs and the GLA, to avoid conflicts between different uses.

User:	Mrs Ann Chapman

We generally support the idea of diversifying the night-time economy away from licensed premises. However, we do not consider sufficient attention has been given to the impact of such aspects of the night-time economy as extended hours upon local residents and, in particular, the cumulative impact of such premises in town centres where residential areas now exist in the centre of towns (e.g. as in central Ealing). Protection for such residents should be enhanced.

User:	GMB Trade Union (London Region)

GMB supports actions being taken to create a night time economy and urge that transport systems are in place and that the Mayor considers linking this inititive to London Living Wage to ensure that all establishments pay this and those who confirm should be given reductions in business rates

User:	Putney Society

Para 7.6.2 We agree that the night-time economy is a valuable asset in the mix of businesses and attractions in Putney. However, many people live in Putney High Street and similar locations with a busy night life and in surrounding residential roads, and it is important that any negative impacts on their quality of life resulting from increased late-night noise late should be minimised, and that this should be part of the borough's policy and strategy.

User:	Putney Society

Para 7.6.3 In thinking about central Putney's status in the night-time economy as an area with more than local significance (category NT3), we agree that people are attracted to its various bars and restaurants, including students from Roehampton, people returning from rugby and football matches, and to the riverside in summer. Putney is well placed to capitalise on these temporary populations, and in this regard, it is essential that there is adequate provision of public toilets (see para 7.6.11 and Policy S6 above) and that these are accessible to all.

User:	Royal Borough of Kensington and Chelsea

7.5 Policy HC6 Supporting the night-time economy

The Council supports the night time economy but recognises that there are some settings which are more sensitive, and rare circumstances where it would not be appropriate and residential amenity must to preserved. In Kensington and Chelsea, the town centres are linear which creates a challenging environment for combination of a night time economy and the preservation of residential amenity. This uncommon occurrence and the acknowledgement of some flexibility depending on context would be welcomed.

The Council welcomes the support of evening and night time cultural venues detailed in Policy HC6 B (6).

User:	National Trust London

Policy HC2 World Heritage Sites, **Policy HC5 Supporting London's culture and creative industries**, **Policy HC6 Supporting the night-time economy**, and **Policy HC7 Protecting public houses** are all welcomed and supported by the National Trust in London. They are especially noted for the breadth of heritage they seek to preserve and promote, fostering a more inclusive understanding of heritage that reflects the diversity of Londoners (7.5.4) (7.6.11) (7.7.2).

User:	Musicians Union London
MU Consultation response already submitted.	

User: Covent Garden Community Association

HC6 refers to the NTE as being from 6pm to 6am. By contrast SD4 talks about an evening and night time economy and 3.12.7 makes the point that cultural venues have noise peaks at varying times of the day. We do not believe that it is appropriate to apply the same policies throughout the 6pm to 6am period. There are distinct but linked evening and nigh-time economies and it is appropriate to have different policies for these.

As part of this issue we believe that HC6B1 and HC6B4 are in conflict. One clear way of addressing existing issues of cumulative impact is to place restrictions on new NTE activities. However HC6B1 requires Boroughs to promote this activity within the CAZ. A reference to avoiding the negative effect of cumulative impacts within HC6B1 would make this clearer.

User: London Borough of Islington

Chapter

Heritage and Culture

Draft London Plan Policy

Policy HC6 Supporting the night time economy

Islington Response

HC6 introduces a definition of the night time economy which is defined as all economic activity taking place between the hours of 6pm and 6am. Criteria are introduced against which decisions on night time economy can be judged

The definition of night time economy (NTE), for planning purposes, is welcomed and we support the aim for a more integrated approach between planning and licensing, although recognising that they are separate legislative regimes. The Council would always expect local context to be a factor in decision making around NTE and Licensing Policy already defines strategic NTE areas alongside different definitions for evening economy (ending before midnight) and late night/ NTE for activities extending beyond midnight. Licensing Policy also supports the Mayors approach to encourage the 24-hour city vision by setting out approach to encouraging and supporting a diverse, safe and welcoming evening and night time economy for example through encouraging mixed use venues, coffee shops selling alcohol in the evenings, promoting live music venues and women's safety in the NTE.

Policy HC6(B)(4) refers to residents experiencing negative cumulative impacts of high concentrations of licensed premises. However, it is not just residents, its other land uses which may be impacted by cumulative impacts of concentrations of licensed premises such as places of worship and community orientated uses. We ask that this aspect of policy to be reconsidered.

User:	Theatres Trust

We support this policy but suggest that it is renamed ‘Supporting the evening and night time economy’ to better reflect the range of uses and times to which the policy applies, and for greater consistency with part B.6.

The direction within part B.6 for boroughs to support venues including theatres through development plans, strategies and development decisions is welcomed and something that will be an invaluable tool in ensuring that arts and culture will be treated as a greater priority.

User:	UK Music
We welcome Policy HC6 with regard to supporting the night-time economy	

User: City of London Corporation

This policy supports and promotes a 24-hour City, with a focus on the CAZ and key town centres across London, requiring that boroughs develop local strategies for the night time economy. It is noted that the Barbican is identified as a night time area of ‘international or national significance’ (NT1). This is supported and accords with the City Corporation’s vision for the Culture Mile. Cheapside and Liverpool Street Principal Shopping Centres (PSCs) within the City of London are identified as night time areas of ‘more than local significance’ (NT3). In contrast to Policy SD7 and Annex 1, which are very clear about the role of different town centres within the overall London hierarchy, there is a lack of clarity in Policy HC6 and Annex 1 about the policy implications of the three different night-time economy designations. This should be addressed in the final version of the London Plan.

The City Corporation suggests that a specific link to the Mayor’s Vision for London as a 24 Hour City should be included and also that the work of the Night Time Commission is both mentioned and commitment is made to build upon its inaugural work.

Whilst supportive of the Mayor’s aim to support London’s night time economy to deliver an attractive and successful city, the City Corporation considers that reference should also be made to the needs of residents, workers and visitors for periods of quiet and relaxation, particularly between the hours of 11pm and 7am. There should be a policy requirement for boroughs to take account of local context and local sensitivities, particularly in residential areas, when developing and implementing strategies for the night-time economy.

User:	London Borough of Barnet
Support principle subject to amenity issues being fully considered.	

User: Caroline Pidgeon

I am pleased that steps are being taken to protect London's night time economy in the draft London Plan. Policy HC6 aims to address the cumulative impact of high concentrations of licensed premises, which is sensible. However, the policy should include an amendment to encourage cooperation between boroughs on high streets that do not sit neatly within any one borough boundary.

I agree with the statement made by London First that London is only just "catching up with international competitors in its support for the night economy".[1] I would also like to see more late-night transport options available to Londoners so that they could take full advantage of our city's spectacular night time economy offerings. Your draft plan stresses the need to "ensure night-time economy venues are well-served with safe and convenient night-time transport"[2], but this is completely at odds with your swinging cuts to London's night bus services. Outer London boroughs remain underserved by public transport, especially at night. If you are serious about boosting London's night time economy, you need to rethink your severe cuts to bus services.

[1] London First written submission to the Economy Committee's response to the Mayor's draft London Plan 2017

[2] Sadiq Khan, Draft London Plan, Policy HC6, P.292

User:	Eastcote Conservation Panel

Stronger measures are needed to ensure that Local Authorities have the power to refuse such venues as night clubs being opened in smaller towns and villages. Most of the Metroland Towns are within residential areas, late night/early hour entertainment causes problems to the inhabitants of residential areas.

The same applies to the hire of parks for festivals etc., especially where the park is not near to adequate public transport that can deal with large crowds attending.

User:	London Assembly Planning Committee

We welcome the inclusion of this new policy. London’s night time economy (NTE is a key driver of economic and cultural activity, contributing two-fifths to the overall value of the UK's night time economy. We therefore consider it appropriate to take a strategic approach to developing London’s future NTE, and to make the requirement to support diversification intrinsic to future planning at a local level.

8.9 A strategic overview will be vital to ensure coherence across London’s NTE as it develops. Stakeholders contributing to the Economy Committee’s investigation into the NTE, firmly support the need for some form of overview.[67] One contributor noted “from (our) perspective, that sort of infrastructure and that sort of clarity of partnership and focus is what we push for all over the country.”[68] Recommendations – Policy HC6B inclusive access and safety We believe there is scope for a more precise definition, or as a minimum, guidance on what is meant by the phrase “inclusive access”. The Economy Committee’s investigation found the term can cover a range of access issues: gaining physical access to a venue, if you are a wheelchair user for example; the ease with which you can access a chosen activity by public transport; the affordability of the activity; and ultimately the availability of a chosen entertainment or leisure activity.

8.10 Written evidence to the Economy Committee highlighted the challenges faced by disabled individuals on a night out.[69] NTE venues can often be inaccessible and the management of crowds outside of venues not necessarily conducive to allowing easy access for disabled people who need to pass by. The Committee’s findings consider the option for developing a ‘gold standard’ for how venues and events are managed and run, which would involve training workers to be exemplars of good practice across the entertainment industry. Recommendations – Policy HC6B diversify the range of night-time activities London’s NTE needs to diversify as it develops. The Economy Committee notes the requirement to consider the diverse ways in which this might be done, including exploring the possibility of extending the opening hours of existing daytime facilities. However, we believe that boroughs will also need to be: creative about content, welcoming of different genres of music and appeal to more Londoners. These are crucial to boosting footfall and creating a vibrant, sustainable NTE.

The Economy Committee visited the London Borough of Croydon in September 2017. Several examples of innovative and creative approaches to developing content were shared. One example included an Andy Warhol exhibition spread around the town centre to encourage visitors to explore the area beyond their original destination and hopefully encounter new businesses along the way. The exhibition featured tributes to Andy Warhol from a host of local contemporary artists, which were displayed at prominent locations throughout Croydon. A greater focus on the quality of content, coupled with innovative design of the complex to include an event space helped attract more, and a greater variety of visitors to Boxpark Croydon.

8.12 Also at its visit to Croydon, the committee heard the experiences of participants in the GigBuddies initiative. The initiative gives people with learning disabilities the opportunity to experience and contribute to the NTE. A further visit to Hull, UK City of Culture 2017 in October the same year, highlighted ways to involve whole communities. For example, as part of the Hull UK City of Culture 2017 ‘Made in Hull’ celebrations, social enterprise Goodwin Development Trust is working with residents across Hull housing estates on over 60 projects to promote arts and culture. In one such project, I Wish To Communicate With You, residents of the Thornton Estate worked closely with an international artist to turn their homes into an awe-inspiring art installation. Recommendations – Policy HC6B protect and support evening and night-time cultural venues There is scope to require boroughs to consider a dedicated space to regularly showcase and celebrate new artists and musicians, as part of Policy HC6. The requirement for boroughs to provide at least one dedicated “anchor venue” music performance space could usefully be incorporated in the Mayor’s Supplementary Planning Guidance for Culture and the Night-Time Economy, published in November 2017.

8.13 The Economy Committee’s investigation found that dedicated “anchor venues” are needed, to regularly showcase and celebrate new artists and musicians. But finding such spaces may well be an issue for many boroughs as music venues continue to decline. GLA estimates indicate that 40 per cent of music venues have been lost across London since 2007.70 The Committee heard that in Croydon, for example, there is no such space, although some capacity is provided through Boxpark Croydon.

Recommendations – Policy H6B Address the cumulative impact of high concentrations of licensed premises We welcome the requirement for a coordinated approach to managing and mitigating the cumulative impact of licensed premises. However, we consider that this policy could usefully be amended to reflect the fact that the areas in question may not always sit neatly within a borough boundary, and that sometimes working across borough boundaries will be needed.

Recommendations – Policy H6B ensure night-time economy venues are well-served with safe and convenient night-time transport We welcome this inclusion. A well-served transport network will be vital to ensuring a spread of night-time activity across the whole of London, and will help ensure the safety of workers in the night time economy as they travel to and from work.

8.14 Good transport links to and from work are essential. Access to transport to enable safe travel at night, and particularly to make connections for onward journeys travelling back from work, could be better. NTE workers represented at the committee's round-table event spoke of the challenges of finding transport for the whole of their homeward journeys, and of feeling unsafe at times.[71] Transport challenges can also affect individuals not typically considered to be working in the NTE such as cleaners, who, following a late shift, might also struggle to access safe, affordable transport.[72]
Improving transport connections

8.15 The launch of the Night Tube in 2016, followed by a night service on the London Overground network last December has helped earn London the right to be considered a 24-hour city. Further extensions to Overground services from spring 2018 are welcome.[73] However, according to London First, London is only just "catching up with international competitors in its support for the night economy".74 And outer London boroughs remain underserved by public transport, especially at night. The Mayor's draft Transport Strategy acknowledges this problem and the inequity that comes with it. It says: "parts of outer London are cut off from opportunities the rest of the city has to offer by poor Tube, rail and bus links. Poor transport connections compromise economic fairness."[75]

User:	London Borough of Lambeth
Lambeth supports this policy.	

User: Better Bankside Business Improvement District

Historically Bankside was London’s entertainment quarter for activities which would not have been officially permitted within the City, and today it remains a hub of entertainment - home to some of the world’s most renowned cultural institutions, Tate Modern, Shakespeare’s Globe and Borough Market. On average, over 2.5 million people are recorded each month via Better Bankside’s footfall cameras. The area has almost 2000 hotel rooms. In response to point 6.10.2 and meeting the accommodation demands of tourists, Better Bankside in turn need to ensure infrastructure in an area supports the overnight visitors. If a 24-hour city is to be achieved in London, there needs to be consideration of noise implications to residents, street cleaning teams, confidence in the streets late at night and appropriate policing, as well as an effective late-night transport system.

Furthermore, a successful and well managed night-time economy lies at the heart of the strategy to achieve this end result. Devising and delivering those management arrangements is what Better Bankside and other BIDs around the city are engaged in. They bring resource, innovation and an appetite for collaboration with other stakeholders. One example of this is the employment of Section 92 Officers.

Better Bankside has deployed a 7 day a week warden service in partnership with Southwark Council for the past 14 years. An analysis of the timing and nature of crime statistics indicated that a significant part of the problem impacted outside the hours that the wardens are active (08:00 – 20:00). And it was on order to address these night time hours that was one of the motivations for our investment in Section 92 officers.

Each area is different. It is useful to have a pan-London framework for dealing and developing the night-time economy. But a central tenet of that framework should be that areas need to be able to develop solutions customised to local conditions. The application of Busk in London serves to illustrate how a regime that may work perfectly well in one location can be inappropriate elsewhere. Joined up thinking at the strategic pan-London level, allied to locally forged management initiatives at the tactical level is the way forward

User:	West End Partnership

In respect of Policy of HC6 and paragraph 7.6.1., the DRLP defines the night-time economy as being from 6pm to 6am. Insofar as the West End is concerned, there is a very clear distinction between the evening economy (6pm-12am/1am) on the one hand and the night-time economy (12am/1am-6am) on the other. The evening economy of the West End should be strongly promoted, subject to being managed. The management of a night-time economy is very distinct and requires a more robust and multi-agency approach.

User:	London Borough of Haringey
The Policy is supported.	

User:	London Cycling Campaign

Add:

7) provide cycle parking at popular destinations

User:	London Borough of Barking & Dagenham

The council strongly support this policy and its focus on supporting a night time economy. Night time economies represent a valuable asset to local and national economies through job creation, revenue and providing opportunities for people to socialise as a borough where the employment age of residents of working age (16-61) is lower than both London (73.7%) and England (74.2%) methods to boost the local economy are warmly welcomed. However, we would like a clause added the diversity of the night time activities includes creating more options that don’t necessarily involve the consumption of alcohol. This is as alcohol in excess can be harmful to health.

User:	Soho Society

HC6 Paragraph 7.6.1 and the policy should make clear that the night time economy is made up of a very welcome evening economy which is diverse and widely patronised and supported together with a late night economy which is much more dependent on the sale of alcohol and the consumption of drugs and which has many noise and antisocial behaviour/crime impacts and which needs much tighter and better resourced regulation.

User:	London Borough of Lewisham

Whilst we support HC6, equal consideration should be given to protecting and supporting evening and night-time cultural venues and anti-social behaviour that impacts on the safety of other visitors. HC6 should also promote good health by emphasising that the diversity of night time economy includes options that don’t involve alcohol.

User:	London Borough of Brent

The Council supports this policy.

In particular, the Council supports the night-time economy in the identified areas of Wembley (NT1 International/National) and Kilburn (NT3 More than local). The Council is proposing a revision of its current Statement of Licensing Policy by limiting the number of off-licenses and encouraging more well managed and problem free on-licenses such as restaurants and music venues etc.

User: London Borough of Bromley

The Council notes the thrust of this new policy on supporting the night time economy and welcomes the recognition in the policy that 24 hour activities are not suitable everywhere in London and should be balanced against the needs of local residents.

The Council notes that the Crystal Palace District Centre previously identified as a an area of more than local significance for the night-life economy in Map 4.3 of the adopted 2016 London Plan is no longer featured in the London Plan 2018 for consultation.

User: London Councils

This policy states that boroughs should promote the NTE by developing plans, improving access and safety and diversifying the range of activities available to address the cumulative impact of high concentrations of licensed premises. While boroughs in many cases support the NTE in their areas, there are of course management considerations.

Ensuring venues are well served with transport is a top priority. The GLA should develop proposals in the plan on how TfL services can be aligned to local strategy decisions. The GLA can also set up a framework of consultation between boroughs and the metropolitan police to ensure safety in the NTE.

The policy states that areas in close proximity to an existing cluster or concentration of NTE uses are presumed as suitable for 24 hour activities and that new residential accommodation needs to be assessed on a case-by-case basis. This broad aims of this policy can be supported. However, it is up to boroughs to “balance the needs of residents with the economic benefits of promoting a night-time economy” and this would apply to all relevant planning applications near concentrations of NTE uses. The GLA can clarify whether this ‘balancing test’ applies regardless of whether a development is located outside or within one of the centres shown in Figure 7.7 in the plan. London Councils believes that the promotion of night time activity must also include the need to fully consider impacts on residential amenity in the locality.

Some boroughs have expressed reservations about the NTE because of the impact it has on services such as health and policing. There is also strong resistance from residential neighbourhoods impacted by noise issues, including at the margins of areas designated as NTE. The plan would benefit from considering how best practice could be developed in minimising the impact of the NTE on both of these points.

User:	London Borough of Tower Hamlets

The policy aligns with our approach to address cumulative impact of high concentrations of licensed premises and their impact on anti-social behaviour, noise pollution, health and wellbeing.

User: Richmond Society

Policy HC6 (Supporting the night-time economy (page 294)) supports the Mayor's Vision for a 24 hour economy. The Richmond Society wholly rejects the idea that Richmond town should extend the hours of its evening economy. We believe this position is fully supported by the police and Richmond council. The position is also supported by the Local Plan and Richmond Village Plan.

Richmond council has adopted a Cumulative Impact Policy (under the provisions of the Licensing Act 2003) to prevent any increase in the town's capacity for provision of alcohol and to prevent any extension of the hours for supplying alcohol later in the evening or earlier in the morning. The Policy is also used to encourage earlier hours during the weekdays and on Sundays. Exceptions can and are occasionally made to the Policy when granting licences but applicants must demonstrate there would be no risk to the licensing objectives, which include prevention of public nuisance and crime and disorder. The police resources are few, given that during the day they have to deal with burglaries in the residential areas of Richmond and shop lifting and theft in the retail areas and then control the evening economy. In fact police resources are so thin that there is no police base in the town any longer.

Richmond town spatially is confined by the A316 and the historic Old Deer Park, by the river Thames and by the residential area leading up Richmond Hill. This small triangle combines retail, office, entertainment and residential uses in close proximity to each other. In addition there is open space such as Richmond Green, the riverside and its pocket gardens. Packed into this confined area are many cafes, restaurants, pubs, bars, take-aways and a night club. The concentration in terms of number per square metre of restaurants, pubs and bars is as high as that in parts of central London, such as Edgeware Road, Soho and Covent Garden. This means that alcohol related anti-social behaviour permeates the town and especially its open spaces. It is impossible to avoid alcohol related boisterous behaviour from being anti-social and impacting residents and visitors occupying the same overall space.

The town is relatively unique in having had several professional independent observational studies of the evening economy and measurement of the alcohol related incidents. The Richmond Society itself has dealt with over 250 licence applications over the last 20 years. So there is a substantial evidence for our comments.

The level of alcohol related anti-social behaviour is too high and shows no sign of abating, although it does fluctuate seasonally and from year to year. It takes ourselves, the police, the council and residents a great deal of time and effort to keep some sort of balance between the provision of an evening economy that can be enjoyed by many while not harming the quality of life for residents and the enjoyment of visitors.

It is essential that residents have the opportunity for eight hours sleep but this is impossible with overhead arrival aircraft approaching Heathrow. Adding yet more disturbance from the intensification and extension of the evening economy would be wholly unacceptable to the residential community. There is increasing evidence of the harm to health caused by loss of sleep and stress from anti-social behaviour. Most of Richmond's licensed premises close between 11:30 and midnight and the Richmond Society, police and council have strongly resisted a lengthening of the hours for supply of alcohol, both in the evening and morning.

The town is well served by rail, underground and buses. But the service reduces considerably around midnight. Dispersal of up to 10,000 visitors on a summer's evening, for example, results in noise and anti-social behaviour. An extension of transport hours coupled with an extension of the evening economy hours would have a large adverse impact on residents.

Richmond has for many years attracted people from all over London to enjoy the river, open spaces and town. But changing the character into that of a "destination" would be retrograde in our view. Indeed it is the very diversity of the space in terms of its commercial, retail, entertainment and open spaces for relaxation that are the town's relative attraction compared to other towns. Intensification of use such as extending use to a 24 hour night time economy would be seriously harmful to the town's character and to residents and visitors.

The evening economy can be commercially viable in its current state and does not necessarily need a 24 hour evening economy. There is an economic cost to the evening economy in terms of policing and council resources and burden on the NHS services. We calculated, albeit in around 2005, that Richmond's evening economy cost around £6 million a year in terms of extra resources, hospitalisation and lost productivity. This figure was based on Government estimates for England.

We welcome the recognition in the London Plan that each town is unique and that the local councils and local residential and commercial communities should decide on the future strategy for each town. It is important that the Mayor's London Plan does not over-ride the local management of Richmond town by promoting a wholly unwelcome 24 hour evening economy. We recommend the draft London Plan be amended so as not to fuel the idea of a 24 hour night time economy in residential towns such as Richmond.

User:	Royal Borough of Kingston

Support, and share the ambition to grow the night-time economy in particular in Kingston Town Centre which is identified as an area of regional or sub-regional significance.

User:	London Borough of Hackney

Hackney is supportive of this policy which encourages diversification of the night time economy and promotion of the night time economy in appropriate locations.

User:	London Borough of Hounslow
LB Hounslow supports this policy	

User: InLinkUK

London’s night time economy is central to its success as a truly global city, with this having been strengthened over the years through the relationship between advances in technology and our physical environment.

In our increasingly digital age the simple act of someone losing digital connectivity by no longer having access to their mobile phone (through low battery, loss, theft, no signal, etc.) can weaken their willingness to participate in the night time economy. Similarly, the mere threat of losing digital connectivity can limit a person’s interest in participating.

Capitalising on existing and emerging information technology is a key opportunity for improving London’s night time economy. Central to this is improving the provision and use of transport infrastructure, capitalising on the benefits of improved digital connectivity and improving upon perceived and actual threats to a person’s safety.

There are a range of ways we can use digital technology to improve connectivity and safety in

London’s night time economy for the benefit of all. For example, seemingly simple tools like Citymapper and the open sharing of Transport for London travel information have fundamentally improved how people use and navigate the city at night.

Similarly, the improvements in digital connectivity through services like the free Wi-Fi and calls provided by InLinks and other services allows users of the night time economy to have more varied and safer experiences.

Recommendation #17

? That Policy HC6 be updated so Development Plans, town centre strategies, and planning decisions should seek to improve levels of digital connectivity available to all those involved in the night time economy of London.

User: Westminster City Council

It is wholly misleading to talk in terms of a London-wide evening and night-time economy and to suggest there is a single approach that is suitable in every case (the Mayor has implicitly recognised this for the West End through his participation in the WEP, which has agreed an approach to these issues that is not reflected in this policy).

In particular, the draft policy also fails to give any recognition to the different characteristics, and potential different approaches, to the evening and night-time economies respectively. The nature of uses and their impacts – and the policy response required – will differ between evening (up to midnight) and night-time (midnight – 7 am). This temporal distinction must be reflected in the title and substance of this policy.

The lack of reference to the adverse impacts of app-based delivery platforms on residential communities, and how these might be addressed, is a concern. The continued growth of this industry is a strategic issue that is increasingly affecting large parts of London, yet the plan is notably silent on it.

Under criterion B(4), it should be recognised that whilst management of licensed premises can sometimes be effective, there may be instances where the cumulative impact of such premises means that new such uses will be inappropriate.

User:	London Borough of Southwark

The council supports the classification of night-time economy areas in the CAZ, Peckham, Elephant and Castle and Canada Water in Southwark as identified in Annex 1. The council supports the diversification of night-time activities and measures to ensure safety and activity in the ambition for a 24-hour City. The council recommends Old Kent Road is also classified as an area for the night-time economy.

User:	London Borough of Redbridge

The Council strongly supports this policy. Applications in Ilford Town centre should state how they are making a positive contribution to the night-time economy.

User: London Borough of Wandsworth

The recognition of the night time economy and some of the means of managing its impact is generally welcomed. However, the policy is mainly concerned with promotion of the night time economy and the Council considers that the wording should also recognise the importance of proactive management plans in considering the possible negative impacts to ensure clarity on the management of possible conflicts. Clapham Junction is identified as having a night time economy role of regional/subregional importance with Putney & Tooting of ‘more than local’ importance but there is a lack of clarity as to what this means in practice and why Wandsworth Town is not recognised.

The Mayor has also recently consulted the Council on his Night Time Commission’s future of London’s night time economy. It is considered that the draft London Plan should have already been front loaded with evidence on the night time economy so that the Council could adequately respond to a policy stance. Given the Commission’s findings won’t be heard until late in 2018 consideration of any policy steer will not fit well into the Plan’s development and any changes to policy would not have been considered by the Council until very late in the plan process

User: McDonald's Restaurants Ltd

17. Policy HC6: Supporting the night-time economy

McDonald’s is a long-time supporter of, and one of the largest operators in, London’s night time economy. As we set out in our response to the Mayor’s Night Time Economy SPG Consultation and the Night Time Commission consultation, we welcome the Mayor’s focus on the night time economy since taking office and share his ambition to make London a truly 24-hour city.

We have been encouraged by recent positive developments that have supported the night time economy such as the expansion of the night tube, the creation of the Night Time Commission and the appointment of Amy Lamé as the city’s first Night Czar.

Improve inclusive access and safety

McDonald’s is one of the few operators in the night-time economy who not only do not serve alcohol, but have strict rules about not having open containers in our restaurants. As such, we are an industry leader when it comes to providing inclusive night-time environments and are proud to serve a wide variety of customers.

To help attract a wider range of visitors to the night time economy, we believe that there is scope for simplification of the planning and licensing system in respect of applications for alcohol-free attractions.

Diversifying the range of evening and night time activities

We are proud to serve London’s key sector workers, whose jobs often require them to work irregular hours, including at night. This includes the emergency services, TfL and night shift workers.

By catering to this demographic at a time of day when few others do, McDonald’s provides an important service to London’s essential service workers.

It is our belief that at present there is a lack of readily available access to convenient, affordable hot food, as well as hot and cold non-alcoholic drinks, before, during or after night shifts. We believe that there are opportunities to address this through the planning and licensing system, and that the planning system is the correct place to deal with food and late-night refreshment applications.

High concentrations of licensed premises

In terms of recommendation B. 4. we believe it is important to recognise the distinct role of late night refreshment outlets in catering to groups beyond those associated with the night-time economy. A large number of our night-time customers' visits are entirely separate from alcohol.

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User: Shaftesbury

The Mayor is promoting London as a 24 hour global city which is fully supported by Shaftesbury. The night-time Economy is focused in the CAZ which includes all of Shaftesbury's portfolio.

The policy recognises the benefits of promoting the night-time economic activity, which is supported by Shaftesbury. It encourages the flexibility to permit day-time uses to extend into the night time and vice versa, which is important for a 24 hour city and fits with consumer demand.

Enjoying the outside spaces including the public realm at night is supported as it attracts visitors and helps decrease crime. This is being encouraged where possible within Shaftesbury's holdings, but policy needs to recognise this within the CAZ.

The policy will assist with the inconsistency in opening hours conditioned to new night time uses. For example, the planning applications for new public house uses are limited to boroughs standard trading hours. The policy should give boroughs greater support to allow later opening hours in CAZ locations to support the vitality of the CAZ as an international destination.

Seeking to integrate planning and licensing is an important policy drive. It will encourage the planning officers to view the licencing hours and ensure they are consistent. Too many conditions have to be amended to reflect licensing because of a lack of joined up thinking in the boroughs, which leads to confusion and problems for business operators.

Out of house servicing and deliveries and environmental cleansing should be supported. This policy will give weight to planning officers when liaising with residents during planning applications.

User:	London Borough of Richmond Upon Thames

The recognition of the night time economy and some of the means of managing its impact is generally welcomed. However, the policy is mainly concerned with promotion of the night time economy and the Council considers that the possible negative impacts could be further addressed particularly where centres have a high residential population. Local Plan policies support the nighttime
economy, and particularly its diversification. However, the
Local Plan also includes policies to limit certain uses classes where there are significant agglomerations in centres and the Council has introduced a Cumulative Impact Policy for Licensing in parts of Richmond and Twickenham.

User:	Marble Arch Partnership

We welcome Policy HC6 but it would be helpful if there was a distinction between evening uses (up until say midnight) and night time activities as the former are much less likely to affect residents getting a good night’s sleep. In addition, the Policy would be better if it differentiated between NTE activities that are alcohol based and others. Our NTE is based around eating out and there are only very rare instances of drunken behaviour, which are limited in any event to the odd individual and not large groups of drunken adults.

User:	London Borough of Harrow
The Policy is supported.	

User:	Royal Borough of Greenwich

Support the introduction of a positive and proactive policy relating to the night-time economy. Welcome the clear focus on diversifying the offer and consider that the identified criteria will together serve to deliver a more inclusive, enjoyable and wide-ranging offer than current approaches (which tend to focus on regulation rather than positive planning).

User: London Borough of Havering

The policy is supported in principle and Havering recognises that London cannot readily function without certain activities such as distribution, transport and services taking place around the clock.

However, the draft London Plan must recognise that London varies very considerably and that policy approaches which may be relevant to Central and Inner London may not be appropriate in Outer London where there is a valued and established suburban character and different expectations regarding the role and function of town centres.

Havering would support the provision of a night time economy focussed on a wide range of complementary uses that generate footfall and do not give rise to adverse environmental impacts. It is concerned that the nigh-time economy must not be an ‘umbrella’ approach to the expansion of uses such as bars and public houses where this can give rise to anti-social behaviour and adverse environmental impacts.

The policy refers to using open spaces and the public realm at night. The draft London Plan should recognise that this may impact on cleaning and maintenance activities and environmental amenity where there are homes in close proximity

The recognition afforded to making the night-time economy more enjoyable and inclusive is strongly supported. Havering has an older population and many older persons find town centres at night unattractive and unappealing.

User: Rugby Football Union

In respect of Policy HC6 ‘Supporting the night-time economy’ the RFU supports the Mayor’s support for the night-time economy and in particular within strategic areas of time-time activity. As detailed above, the RFU consider that Twickenham Stadium is of national significance and should, therefore, be detailed on Table A1.1 and Figure 7.7 as an NT1 ‘Areas of international or national significance’ site. In this regard, the RFU consider that paragraph 7.6.4 of the draft Plan that states “Areas of international or national significance play a crucial role in putting London on the world stage, bringing internationally-renowned culture, performers and productions”. The RFU considers that this statement directly applices to Twickenham Stadium and, therefore, this should be reflected within the Plan to ensure support for the Stadium and ensure its continued use as a Stadium of national, and international significance.

Further HC6 Part B(6) should be amended to include ‘national stadium’ as following:

“protect and support evening and night-time cultural venues as **national stadium**, pubs, night clubs, theatres, cinemas, music and other arts venues.

It is noted that Twickenham town centre is included within Table A1.1 and Figure 7.7 and is noted as being an area with ‘more than local significance’.

User: Mr Joe Ward

Policy H6 concerning the night-time economy should be amended by adding the following sentence after sub-section B 1) – **‘adopt measures to protect the peace and quiet of public green and open space within or nearby areas of night-time activity.’**

Rationale: The impact of noise pollution on human health are second only to air pollution according to the World Health Organisation. The ability to experience peace and quiet is an important aspect of the quality of urban life. Green spaces should provide respite from the noisy urban environment. Our recent research shows that nearly 30% of London’s parks are severely impacted by traffic noise (i.e. between 50% and 100% of the park is noisy). Policies should encourage action to tackle this growing problem.

User:	The Wimbledon Society

HC6: Restrictions are needed on the night time economy to protect local residents, particularly with the scaling down and de-localising of the Police service

User:	London Borough of Enfield

Policy HC6 focuses on the ‘Night Time Economy’. It fails to recognise that Enfield aspires to have a night-time economy and wants to be on the network. Green and digital infrastructure should be used to promote safety in town centres with the mayor being more proactive in supporting boroughs where there are strong restrictions on the night time economy. Night time economy should be promoted within opportunity areas.

User:	Capco Covent Garden

We fully support Policy HC6 in supporting and promoting London’s night time economy as part of a global city, whilst balancing amenity considerations.

User: Mama Ujuaje

HC6: Recommended text:

A. Boroughs should develop a vision for the entertainment economy, supporting its growth and diversification, for the whole family and in particular within strategic areas of night-time activity (see Table A1.1 and Figure 7.7), and building on the Mayor's Vision for London as a 24-Hour City.

B. In Development Plans, town centre strategies and planning decisions, boroughs should:
1. promote the entertainment economy, and, where appropriate, particularly in the Central Activities Zone, strategic areas of night-time activity, town centres, and where public transport such as the Night Tube and Night Buses are available
2. improve inclusive access and safety, and make the public realm welcoming for all entertainment economy users and workers
3. diversify the range of entertainment activities, including extending the opening hours of existing daytime facilities such as shops, community centres, cafés and restaurants, libraries, galleries and museums
4. address the cumulative impact of high concentrations of licensed premises and their impact on anti-social behaviour, noise pollution, health and wellbeing and other impacts for residents, and seek ways to diversify and manage these areas
5. ensure night-time economy venues are well-served with safe and convenient night-time transport
6. protect and support evening and night-time cultural venues such as pubs, night clubs, theatres, cinemas and music and other arts venues.
7. Protect, support and promote family-friendly, all day and weekend cultural venues such as those that particularly apply to minority communities, such as temples, mosques and other places of worship, community centres and food outlets that sell healthy ethnic food offerings and support the sale of local food hubs.

C. Promoting management of the entertainment economy through an integrated approach to planning and licensing, out-of-hours servicing and deliveries, safety and security, fostering links between healthy food hubs and cooked food outlets and environmental and cleansing services are to be supported. Boroughs should work closely with stakeholders such as the police, local businesses, patrons, workers and all community residents.

7.6.1
The night-time economy refers to all economic activity taking place between the hours of 6pm and 6am. Night-time economic activities include eating, drinking, entertainment, shopping and spectator sports, as well as hospitality, cleaning, wholesale and distribution, transport and medical services, which employ a large number of night-time workers. The entertainment economy refers to all entertainment venues whether daytime, evening or night-time, taking place on weekdays and at weekends and include the celebration of cultural calendars, births, weddings and funerals and other special community events promoting cohesion, integration and resilience.

7.6.2
The night-time economy is becoming increasingly important to London's economy. The Mayor is keen to promote London as a 24-hour global city, taking advantage of London's competitive edge and attractiveness for businesses and people looking to expand beyond the usual daytime economy into night-time economic opportunities. However, 24-hour activities are not suitable for every part of London and its residents, and boroughs should balance the needs of local residents and their diverse community needs with the economic benefits of promoting a night-time economy. Also, such activities should seek to promote and celebrate London's diverse community presence through encouraging an atmosphere of tolerance, welcome and respect.

7.6.3
London's night-time economy is generally focused in the Central Activities Zone and within town centres across the city. Different areas of night-time activity function at different scales and have different catchments. They have been classified, as set out in Table A1.1 and Figure 7.7, into three broad categories, all of which acknowledge the existence of areas of community value and areas which have national, regional or more than local significance because of the long term presence of particular communities of culture or interest:

- NT1 – Areas of international or national significance
- NT2 – Areas of regional or sub-regional significance
- NT3 – Areas with more than local significance

Figure 7.7 needs to be amended in order to reflect a greater diversity of areas of community cultural significance.

7.6.4
Each area will have its own character, which should be recognised and supported in order to maintain the rich diversity of London's night-time economy. Areas of international or national significance play a crucial role in putting London on the world stage, bringing internationally-renowned culture, performers and productions. Regional and sub-regional areas attract visitors from across and beyond London, and often have one or more larger venues and a mature night-time economy. These are generally in London's larger town centres. Areas with more than local significance draw visitors from other parts of London and tend to feature smaller venues and premises.

7.6.5
In addition, there are some town centres where the night-time economy serves the local area as well as other specific locations – such as London's wholesale and retail markets, major hospitals, and some industrial areas – where there is significant economic or service activity at night. This includes some retail and service industries, health services, policing and security, and transport and logistics. In exercising their various functions, boroughs should have regard to the strategic areas of night-time activity, as well as other night-time economic functions, and should set out strategies and policies that support the specific role of these areas in order to promote London's night-time economy.

7.6.6
There are many benefits to promoting night-time economic activity such as generating jobs, improving income from leisure and tourism, and making town centres safer by increasing activity and providing passive surveillance. Managing issues such as transport, increased noise, crime, anti-social behaviour, perceptions of safety, the quality of the street environment, and the potential negative effects on the health and wellbeing of Londoners, will require specific approaches tailored to the night-time environment, activities and related behaviour. Boroughs are encouraged to consider appropriate management strategies and mitigation measures to reduce negative impacts on the quality of life of local residents, workers and night-time economy customers. Boroughs should also take account of local circumstances when considering whether to concentrate or disperse evening and night-time activities in town centres or within the CAZ.

7.6.7
Large concentrations of night-time activities can result in some places lacking activity and vitality during the day. Boroughs should consider opportunities to encourage the daytime uses of buildings that are mainly used for night-time activities to help diversify the 24-hour offer, especially to community organisations. Similarly, boroughs should explore the benefits of expanding the range of night-time economy activities to include extending opening hours and alternative evening and night-time uses of existing daytime facilities such as shops, markets, cafés, libraries, theatres and museums. The temporary use of spaces and venues in the evening and at night can enhance the vibrancy and vitality of the night-time economy, particularly meanwhile uses of vacant premises, for example as cultural arts venues, nightclubs, bars or restaurants.

7.6.8
The recently introduced Night Tube that operates on many Tube lines throughout the weekend, and the extensive network of night buses, has helped to create a public transport system that can support a 24-hour city including making travel easier for London's many night workers. Boroughs are encouraged to work with Transport for London (TfL) to take advantage of improved night-time public transport to identify areas where night-time economic activity can be promoted and enhanced in a safe and attractive way. This would include considering planning applications for night-time venues and activities to diversify and enhance the night-time offer in town centres,particularly those that are within or well-connected to Areas for Regeneration (see Policy SD10 Strategic and local regeneration). Outer London boroughs, in particular, should consider the opportunities offered by an extended Night Tube and Night Bus network to increase the night-time offer in town centres for local residents, workers and visitors.

7.6.9
Boroughs should explore the benefits of diversifying the night-time mix of uses, particularly in areas where there are high concentrations of licensed premises, along with extended opening times of public places and spaces. This can help attract a wider range of visitors and support the uptake by families drawn from a wider range of communities, including those who feel excluded from alcohol-based entertainment activities. It can also help decrease crime, anti-social behaviour and the fear of crime.

7.6.10
The night-time economy doesn't only happen inside; many night-time activities make use of outside spaces including the public realm, and enjoying the public spaces of the city at night is an important part of the night-time experience. This requires careful and co-ordinated management between a wide variety of stakeholders in order to ensure that the city can be enjoyed at night to its fullest, and that the night-time economy complements rather than conflicts with daytime activities.

7.6.11
There are groups of people who avoid town centres and night-time activities for a variety of reasons, for example physical barriers and lack of facilities for disabled people and older people, perceptions around safety and security particularly for women, those who feel excluded for socio-economic and cultural reasons and issues of staff attitudes towards, and awareness of, LGBT+ and BAME groups. Making London's night-time culture more enjoyable and inclusive requires ensuring a wide range of evening and night-time activities are on offer to London's diverse population. Boroughs should also work with land owners, investors and businesses to address perceived barriers to accessing the night-time and general entertainment economy and enhance the experience of London at night. This can include requiring new developments to provide accessible toilets (see Policy S6 Public toilets), working with local police and businesses to make streets and the public realm safer and more welcoming, ensuring cleansing services are procured to clean up litter and sanitise streets and public areas, and working with local businesses, communities, TfL and logistics operators to optimise servicing that occurs at night or supports the night-time economy.

User: Just Space

Policy HC 6 Night time economy

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

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

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

Change

7. Protect, support and promote family-friendly cultural venues that are open all day and weekend, including those that apply to minority communities, such as temples, mosques and other places of worship, community centres and food outlets that sell healthy ethnic food offerings and support local food hubs.

User:	Kingston University

Policy HC6: Night Time Economy
The economic and social benefits of developing a night time economy are acknowledged and the University supports the Mayor’s aims to further develop London’s night time economy. The University’s students and staff already make a positive contribution to Kingston’s night time economy and opportunities to further enhance this contribution in a managed way should be pushed forward.

User: Heart of London Business Alliance

London already has the most varied and developed evening and night time economy (ENTE) in the world and we warmly welcome the positive Policy HC6: Supporting the night time economy. For a detailed account of Heart of London's view on the opportunities for growth and diversification in the ENTE please refer to our submission to the Night Time Commission[11].

Heart of London represents the most mature part of the ENTE in London and some of the world's most important cultural institutions. These range from the Royal Academy of Arts, National Gallery, and National Portrait Gallery, to the theatres of Shaftesbury Avenue, the cinemas of Leicester Square, casinos including the Hippodrome, as well as numerous bars, restaurants, offices and hotels – big and small.

Over 200 million visits are made to the West End every year, with some of the world's best entertainment, culture and hospitality; generating over £11 billion in sales[12]. We strive for the West End to have the most varied and high quality evening and night time offer for visitors, workers and residents. In large part that is what is achieved, though there is huge potential for growth in this area, underlined by London First and EY's research into the economic value of London's night time economy (NTE) and potential of the Night Tube.

A detailed cost benefit analysis conducted by Westminster City Council (WCC) in 2015 estimated that the core West End, representing just 4.5% of the borough's area (and 2.9% of its resident population), generated a combined revenue of £428m in 2013 just from 'core' night-time economy activities such as drink, food and entertainment.

In terms of economic benefit, the ENTE far outweigh the costs to the public sector. These benefits are only expected to rise as the way that we live, work and socialise evolves. We welcome the recognition of the West End as an area of international or national significance for the night-time economy (NT1) in para. 7.6.3. However, we feel that this definition is overly broad and has not been subsequently utilised in policy to drive growth. By not requiring any specific action in policy from local boroughs, or support for new night time uses, there is a high risk that the Mayor's goals will not be delivered.

Even in internationally recognised centres for the ENTE like the West End, the range of activities on offer at night is highly restrictive, certainly compared to international equivalents. This would be helped by more positive and considered use of the planning system to proactively plan for the ENTE, as encouraged in the Mayor's 'Vision for London as a 24-Hour City'. A lack of effective alignment of planning and licensing policy in most areas means that there is no long-term vision for how the night time operates in town and city centres, and policies on hours and uses frustrate opportunities for responsible and managed growth. Policy HC6 A is hugely welcome in this regard, requiring boroughs to produce their own visions for the night time economy; we would hope that this takes account of the positive economic and social benefits of the ENTE as well as the costs.

A diverse culture and night time economy offer has the potential to lead to a more inclusive and responsible street culture at night, if accompanied with strong management and partnership working, with a wider range of groups attracted to the ENTE and less focus of vertical drinking activities. We would welcome a clearer distinction between different types of ENTE venues. Policy HC6 B should separate the definition of ENTE cultural venues in section B6 into further categories, recognising the very different role theatres, cinemas, music and other arts venues play when compared to pubs and night clubs. The former has a role to play in diversifying the ENTE in areas of high concentrations of alcohol led venues and making the night-time more accessible and inclusive. Policy HC6 should be amended to support this type of diversification.

Finally, we feel that BID's should be explicitly recognised for their roles in promoting and managing the night time economy. Where they exist, BIDs have played a vital role working in partnership with the local council, businesses, residents and the police to promote a responsible, safe and flourishing ENTE.

Strong partnership work and industry standards have made huge progress; Heart of London works in close partnership with the Greater London Authority (GLA), Westminster City Council, the West End Partnership and the Metropolitan Police to promote a responsible night time economy. Crime and anti-social behaviour (ASB) associated with the ENTE have been on a long downward trend and we need to be positive about the opportunities and benefits that the ENTE brings.

We have worked with Leicester Square businesses since 2010 to achieve Purple Flag accreditation, in recognition of a well-managed evening and night time economy, and in 2016 we expanded this area to include Piccadilly Circus businesses. We launched the first Best Bar None scheme in Westminster last year with our members to encourage high standards not just for pubs and clubs, but for all evening and night time venues.

This is part of a wider approach of piloting a range of schemes under a new initiative called the Westminster Licensing Charter, a partnership with Westminster City Council and the Metropolitan Police. The objective is to responsibly manage and grow the evening and night time economy, while being considerate of the needs of residents and vulnerable people.

Policy HC6 C should refer to BIDs as a key stakeholder and the guidance should recognise that boroughs should work with BID's, where they exist, on management, security, servicing, cleansing and placemaking strategies.

[11]?https://heartoflondonbid.london/wp-content/uploads/2018/02/Night-Time-Commission-Consultation-Response-from-Heart-of-London-Feburary-2018.pdf

[12] WEP Vision and Delivery Plan, 2015-2030
[13] London First and EY, The Economic Value of London's 24 Hour Economy (2016)
[14] Westminster Evening & Night Time Economy: A Cost Benefit Study for Westminster City Council (2015)

User: London Borough of Bexley

It is good to see that **Policy HC6 Supporting the night-time economy** does not confine the night-time economy to central London. Bexleyheath, for example, is a centre for the night-time economy within southeast London, with restaurants, pubs, bars, and nightclubs attracting a wide range of people from across the region. The Council welcomes the identification of Bexleyheath in **Figure 7.7** as a cluster of night-time activity; however the designation as only ‘more than local’ significance is inaccurate. Bexleyheath has a sub-regional significance, and it is requested that it be designated as **NT2 Regional/Sub-regional** in **Figure 7.7** and also in **Table A1.1** of **Annex 1**. There is also a growing night-time economy in Sidcup, which has a focus on the performing arts, and in the riverside town of Erith.

It is considered that **Part B(3)** of **Policy HC6** will be difficult to implement. Changing a local town’s perception of how it operates by its users takes time. Getting this investment and commitment from shopkeepers and cafes – who are generally independents and have other commitments after daytime hours such as children and domestic affairs – so to encourage them to open late is very difficult. They may do it once or twice, but if they see no reward for their effort, they soon become sceptical. In addition, borough environmental heath teams tend to resist any noise pollution late at night in town centres, which can prove frustrating when seeking to implement a positive night-time activity.

User:	Federation of Small Businesses

FSB London is greatly concerned about the loss of independent night time venues across London and the impact this has on London as an attractive night-time destination.

User:	Federation of Small Businesses
We wholeheartedly support this measure.	

User:	Federation of Small Businesses
We wholeheartedly support this measure.	

User:	London Healthier Places

While the LHP Network recognises the many benefits of a night time economy, we strongly urge that careful consideration be given to developing a full range of opportunities that are not associated with alcohol and that for the parts of London where there are already cumulative impacts of high concentrations of licensed premises, their impact on anti-social behaviour, noise pollution and health and wellbeing must be taken into account in any further night time economy developments. Consideration should also be given to the impact of evening and late night work on families and on sleep patterns.

We strongly support Policy HC6 Part B) 1, 2, 3, 4 and 5

User:	London & Continental Railways Ltd

Policy HC6 – Supporting the Night-time Economy

With Lower Marsh having a NT2 and the South Bank a NT1 classification, there is an opportunity to protect and enhance the night time economy in Waterloo and the South Bank. Where two or more areas are in close proximity it may be useful to know where the boundaries of the various classifications lie, for instance in relation to Leake Street which hosts a number of night time venues. This policy may benefit from a map, giving certainty over the classification of an area, to developers, landlords and potential occupiers.

User:	Revo

We support the Mayor’s development of a vision for the night time economy of London. Successful cities need a vibrant mix of activities and the further promotion of night-time economic activities such as eating, drinking, entertainment, shopping and spectator sports will increase London’s productivity, economic growth and social wellbeing, alongside the aforementioned commitment to promoting London as a 24-hour global city with the recently introduced Night Tube to unlock new growth.

User: SEGRO

Part A of Policy HC6 encourages Boroughs to develop a vision for the night-time economy, supporting its growth and diversification. This includes promoting night-time servicing and deliveries. Night-time servicing and delivery will be integral to the provision of last mile services, which are becoming increasingly common throughout the urban logistics sector to increase efficiency and productivity.

It is considered that by avoiding rush hour times, and travelling throughout the night, operation efficiencies can be significantly increased and costs reduced. SEGRO therefore strongly endorses more flexible approach to servicing and delivery times.

However, we note that Draft London Plan Policy D13, which seeks to manage noise and disturbance to communities, potentially conflicts and competes with the objectives of Draft Policy HC6. In our experience, London Boroughs typically resist proposals to undertake servicing activities early in the morning/late at night in favour of the objectives of Draft Policy D13. With this being the case, it is essential that the London Plan is clear about how Applicants and Boroughs should manage these matters in planning applications.

If night-time servicing is to be realised, it must be clear within the London Plan that this policy prioritises others, such as D13, which may otherwise frustrate it being effectively applied.

User:	British Takeaway Campaign

The BTC welcomes the commitment within the draft London Plan to promote and support London’s role as a 24-hour city, of which takeaway restaurants and street markets play an important role. It is important to remember that takeaways do not just pack a huge economic punch – contributing £1.4 billion to the London economy in 2016, and supporting more than 23,000 jobs in the capital – they also play a key role in regenerating high streets and enriching local communities.

User: CPRE London

Policy HC6 concerning the night-time economy should be amended by adding the following sentence after sub-section B 1) – **‘adopt measures to protect the peace and quiet of public green and open space within or nearby areas of night-time activity.’**

Rationale: The impact of noise pollution on human health are second only to air pollution according to the World Health Organisation. The ability to experience peace and quiet is an important aspect of the quality of urban life. Green spaces should provide respite from the noisy urban environment. Our recent research shows that nearly 30% of London’s parks are severely impacted by traffic noise (i.e. between 50% and 100% of the park is noisy). Policies should encourage action to tackle this growing problem.

User: British Property Federation

We support the Mayor’s development of a vision for the night time economy of London. Successful cities need a vibrant mix of activities and the further promotion of night-time economic activities such as eating, drinking, entertainment, shopping and spectator sports will increase London’s productivity, economic growth and social wellbeing.

We welcome the Mayor’s commitment to promoting London as a 24-hour global city with the recently introduced Night Tube a key step in unlocking the growth potential of London’s night time economy and bringing its night-time infrastructure up to international standards.

Whilst the development sector does not play a direct role in shaping the night-time economy in London, it does play a crucial role in building the vibrant places that will help these activities thrive.

User: London Wildlife Trust

We are concerned that this policy and its supporting paragraphs suggests there are no environmental impacts for developing further the 24-hour economy. Para 7.6.10 suggests there are opportunities to further the external economy “to ensure that the city can be enjoyed at night to its fullest..” and yet doesn’t address how the impacts on nocturnal biodiversity or to protect dark skies within the city. We recommend that a specific clause is added in Policy HC6 and reference is made to this in the supporting paragraphs, along the lines of:

B In Development Plans, town centre strategies and planning decisions, boroughs should:
7) ensure that night-time economy activities do not cause adverse environmental damage (e.g. noise, light pollution) through appropriate location, design, and timing.

New para
Night-time events can cause disturbance and/or damage to biodiversity, such as bats, if inappropriately designed, located and/or managed. Activities planned on or adjacent to Sites of Importance for Nature Conservation should take account of likely impacts and appropriate measures should be taken to minimise impact, including if necessary undertaking protected species assessments in advance. The potential presence of bat roosts in buildings or trees should also be considered – and if needs be surveyed for - on any site considered for nocturnal activity; licencing from Natural England maybe required if found to be present to ensure legal requirements are met.

User: Brixton Society

HC6, the Night-time Economy:
Local experience is that expansion of the
night-time economy must be planned for, in terms of infrastructure, policing and the mix of competing uses in town centres.

Brixton began to develop a significant night-time economy some 25 years ago, with a few key venues which attracted visitors from a wider area. These gradually were joined by more small to medium venues, either music-based or food-based. However, at the same time, residents have been returning to the town centre, either in new apartment blocks or in renovated accommodation over the shops. A crisis has now been reached with the introduction of the Night Tube and the increase in “vertical drinking establishments”, i.e, bars open late with little else to offer. The environment is rapidly deteriorating due to lack of public toilet provision, high overnight noise levels, and overcrowding around bus stops, stations, and outside venues.

User:	Silvertown Homes

The supporting text should be revisited to make more explicit that the night-time economy does not equate to alcohol-related activities.

Whilst the policy approach is generally welcomed, it will have more effect if the London Plan is more explicit about seeking a broader night-time offer.
Restaurants, cafes and community spaces for example can (and in many parts of London do) make an equivalent social contribution to pubs. This point is also relevant when applying planning policies relating to the loss of pubs.

User:	University College London

Policy HC6 Supporting the night-time economy

UCL recognises the importance of the night-time economy in London and supports the introduction of this new policy. UCL supports this policy given the significant value of the night time economy to both its student and staff.

UCL considers that there could be added value in the policy recognising that HEIs are also significant contributors to this sector both in terms of facilities that they provide (for example UCL's Bloomsbury Theatre) as well as providing a significant portion of the users (students and staff who enjoy these facilities).

User: Bishopsgate Goods Yard Regeneration Limited

Policy HC6: Supporting the night-time economy

We support the Mayor's development of a vision for the night time economy of London. Successful cities need a vibrant mix of activities and the further promotion of night-time economic activities such as eating, drinking, entertainment, shopping and spectator sports will increase London's productivity, economic growth and social wellbeing.

We welcome the mayor's commitment to promoting London as a 24-hour global city which has been helped with the introduction of the Night Tube, a key step in unlocking the growth potential of London's night time economy and bringing its night-time infrastructure up to international standards. Whilst the development sector does not play a direct role in shaping the night-time economy in London, it does play a crucial role in building the vibrant places that will help these activities thrive.

User:	London Borough of Sutton

SUPPORT WITH CONDITIONS. The London Borough of Sutton supports this policy and considers Carshalton Village and Cheam Village should both be designated NT3 (areas with a night-time economy of more than local significance). The council considers that both centres “punch above their weight” in terms of the night-time economy: Carshalton Village in terms of an array of historic pubs, which draws customers from Croydon and Mitcham and Sutton; and Cheam Village in terms of its choice of restaurants, which draws diners from beyond the Greater London boundary.

User: London Borough of Newham

Policy HC6 Supporting the night-time economy

LBN support this policy and the recognition of the topic more generally, including the status of Stratford's night time economy and support to this afforded by the night tube. Extending night-time service to the DLR should also support the evolving offer in the Royal Docks.

Clarity is however required within the narrative of the policy/supportive statement to highlight that an enhanced night-time offer and longer opening hours should not introduce an undue negative impact on residential amenity. It is also necessary to emphasise that the night-time offer should be of high quality so that that such locations are safe and desirable destinations. The policy could be more explicit in reference to the Agent of Change principle to manage the relationship of differing land uses to support a high quality NTE, particularly to protect existing viable operations and promote high quality new development.

The policy also has an excessive focus on one type of night time economy, that based around culture/service industries, however, other types of economic activity are also underway at night. Night time transport is seen as necessary and a fundamental requirement for residents commuting to employment and future economic development of the borough (not just seen as a recreational offer). A significant proportion of travel on night tubes is from residents travelling to and from work. LBN supports the aspirations to ensure that services and offer is comprehensive to meet changing needs of the economy. This is particularly important for areas outside central London. LBN would welcome commitment to expansion of night time tubes across other lines, notably the District and Hammersmith and City Lines to serve East London.

Partly relating to the above, structurally this policy would therefore sit much better within the economy chapter (6). It is considered that it would broaden its scope to support a broader range of economic growth. The reason being that it would be compatible with other uses including industrial uses which are subject to similar considerations such as the 'agent of change' concept, and have evening and night-time operations as part of their business requirements.

User:	Croydon Limited Partnership

Policy HC6 considers the night-time economy and Part B(1) seeks the promotion of this sector where appropriate, particularly in the Central Activities Zone, strategic areas of night-time activity, town centres, and where public transport such as the Night Tube and Night Buses are available. Similarly, Part B(3) promotes the diversification of the range of night-time activities, including extending the opening hours of existing daytime facilities such as shops, cafés, libraries, galleries and museums.

CLP are supportive of this policy and consider that the expansion and diversification of the night-time economy will enable town centres to develop their cultural offer, which will increase their vitality and viability, as well as their contribution to the wider economy.

User: CFGN Community Food Growers Network

Suggested rewording highlighted

HC6

A. Boroughs should develop a vision for the entertainment economy, supporting its growth and diversification, for the whole family and in particular within strategic areas of night-time activity (see Table A1.1 and Figure 7.7), building on the Mayor's Vision for London as a 24-Hour City.

B. In Development Plans, town centre strategies and planning decisions, boroughs should:

1. promote the ***entertainment economy*****,** and, where appropriate, particularly in the Central Activities Zone, strategic areas of night-time activity, town centres, and where public transport such as the Night Tube and Night Buses are available

2. improve inclusive access and safety, and make the public realm welcoming for all entertainment economy users and workers

3. diversify the range of entertainment activities, including extending the opening hours of existing daytime facilities such as shops, **community centres**, cafés ***and restaurants***, libraries, galleries and museums

4. address the cumulative impact of high concentrations of licensed premises and their impact on anti-social behaviour, noise pollution, health and wellbeing and other impacts for residents, and seek ways to diversify and manage these areas

5. ensure night-time economy venues are well-served with safe and convenient night-time transport

6. protect and support evening and night-time cultural venues such as pubs, night clubs, theatres, cinemas and music and other arts venues.

7. Protect, support and promote family-friendly, all day and weekend cultural venues such as those that particularly apply to minority communities, such as temples, mosques and other places of worship, community centres and food outlets that sell healthy ethnic food offerings and support the sale of local food hubs.

C. Promoting management of the entertainment economy through an integrated approach to planning and licensing, out-of-hours servicing and deliveries, safety and security, ***fostering links between healthy food hubs and cooked food outlets*** and environmental and cleansing services are to be supported. Boroughs should work closely with stakeholders such as the police, local businesses, patrons, workers and ***all community*** residents.

7.6.1
The night-time economy refers to all economic activity taking place between the hours of 6pm and 6am. Night-time economic activities include eating, drinking, entertainment, shopping and spectator sports, as well as hospitality, cleaning, wholesale and distribution, transport and medical services, which employ a large number of night-time workers. ***The entertainment economy refers to all entertainment venues whether daytime, evening or night-time, taking place on weekdays and at weekends and include the celebration of cultural calendars, births, weddings and funerals and other special community events promoting cohesion, integration and resilience.***

7.6.2
The night-time economy is becoming increasingly important to London's economy. The Mayor is keen to promote London as a 24-hour global city, taking advantage of London's competitive edge and attractiveness for businesses and people looking to expand beyond the usual daytime economy into night-time economic opportunities. However, 24-hour activities are not suitable for every part of London and its residents, and boroughs should balance the needs of local residents ***and their diverse community needs*** with the economic benefits of promoting a night-time economy. ***Also, such activities should seek to promote and celebrate London's diverse community presence through encouraging an atmosphere of tolerance, welcome and respect.***

7.6.3
London’s night-time economy is generally focused in the Central Activities Zone and within town centres across the city. Different areas of night-time activity function at different scales and have different catchments. They have been classified, as set out in Table A1.1 and Figure 7.7, into three broad categories, ***all of which acknowledge the existence of areas of community value and areas which have national, regional or more than local significance because of the long term presence of particular communities of culture or interest:***

? NT1 – Areas of international or national significance
? NT2 – Areas of regional or sub-regional significance
? NT3 – Areas with more than local significance
Comment on this section

Figure 7.7 - Town centres and night-time economy roles – distinguishing those of international, sub-regional and more than local importance

The above map needs to be amended in order to reflect a greater diversity of areas of community cultural significance.

7.6.4
Each area will have its own character, which should be recognised and supported in order to maintain the rich diversity of London’s night-time economy. Areas of international or national significance play a crucial role in putting London on the world stage, bringing internationally-renowned culture, performers and productions. Regional and sub-regional areas attract visitors from across and beyond London, and often have one or more larger venues and a mature night-time economy. These are generally in London’s larger town centres. Areas with more than local significance draw visitors from other parts of London and tend to feature smaller venues and premises.

7.6.5
In addition, there are some town centres where the night-time economy serves the local area as well as other specific locations – such as London's wholesale and retail markets, major hospitals, and some industrial areas – where there is significant economic or service activity at night. This includes some retail and service industries, health services, policing and security, and transport and logistics. In exercising their various functions, boroughs should have regard to the strategic areas of night-time activity, as well as other night-time economic functions, and should set out strategies and policies that support the specific role of these areas in order to promote London's night-time economy.

7.6.6
There are many benefits to promoting night-time economic activity such as generating jobs, improving income from leisure and tourism, and making town centres safer by increasing activity and providing passive surveillance. Managing issues such as transport, increased noise, crime, anti-social behaviour, perceptions of safety, the quality of the street environment, and the potential negative effects on the health and wellbeing of Londoners, will require specific approaches tailored to the night-time environment, activities and related behaviour. Boroughs are encouraged to consider appropriate management strategies and mitigation measures to reduce negative impacts on the quality of life of local residents, workers and night-time economy customers. Boroughs should also take account of local circumstances when considering whether to concentrate or disperse evening and night-time activities in town centres or within the CAZ.

7.6.7
Large concentrations of night-time activities can result in some places lacking activity and vitality during the day. Boroughs should consider opportunities to encourage the daytime uses of buildings that are mainly used for night-time activities to help diversify the 24-hour offer, ***especially to community organisations.*** Similarly, boroughs should explore the benefits of expanding the range of night-time economy activities to include extending opening hours and alternative evening and night-time uses of existing daytime facilities such as shops, ***markets*** , cafés, libraries, theatres and museums. The temporary use of spaces and venues in the evening and at night can enhance the vibrancy and vitality of the night-time economy, particularly meanwhile uses of vacant premises, for example as cultural arts venues, nightclubs, bars or restaurants.

7.6.8
The recently introduced Night Tube that operates on many Tube lines throughout the weekend, and the extensive network of night buses, has helped to create a public transport system that can support a 24-hour city including making travel easier for London's many night workers. Boroughs are encouraged to work with Transport for London (TfL) to take advantage of improved night-time public transport to identify areas where night-time economic activity can be promoted and enhanced in a safe and attractive way. This would include considering planning applications for night-time venues and activities to diversify and enhance the night-time offer in town centres, particularly those that are within or well-connected to Areas for Regeneration (see Policy SD10 Strategic and local regeneration). Outer London boroughs, in particular, should consider the opportunities offered by an extended Night Tube and Night Bus network to increase the night-time offer in town centres for local residents, workers and visitors.

7.6.9
Boroughs should explore the benefits of diversifying the night-time mix of uses, particularly in areas where there are high concentrations of licensed premises, along with extended opening times of public places and spaces. This can help attract a wider range of visitors ***and support the uptake by families drawn from a wider range of communities***, including those who feel excluded from alcohol-based entertainment activities. It can also help decrease crime, anti-social behaviour and the fear of crime.

7.6.10
The night-time economy doesn't only happen inside; many night-time activities make use of outside spaces including the public realm, and enjoying the public spaces of the city at night is an important part of the night-time experience. This requires careful and co-ordinated management between a wide variety of stakeholders in order to ensure that the city can be enjoyed at night to its fullest, and that the night-time economy complements rather than conflicts with daytime activities.

7.6.11

There are groups of people who avoid town centres and night-time activities for a variety of reasons, for example physical barriers and lack of facilities for disabled people and older people, perceptions around safety and security particularly for women, those who feel excluded for socio-economic and cultural reasons and issues of staff attitudes towards, and awareness of, LGBT+ and BAME groups. Making London's night-time culture more enjoyable and inclusive requires ensuring a wide range of evening and night-time activities are on offer to London's diverse population. Boroughs should also work with land owners, investors and businesses to address perceived barriers to accessing the night-time and general entertainment economy and enhance the experience of London at night. This can include requiring new developments to provide accessible toilets (see Policy S6 Public toilets), working with local police and businesses to make streets and the public realm safer and more welcoming, ensuring cleansing services are procured to clean up litter and sanitise streets and public areas, and working with local businesses, ***communities,*** TfL and logistics operators to optimise servicing that occurs at night or supports the night-time economy.

User:	Blackheath Society

Policy HC6 Supporting the night time economy: We broadly support this policy which is appropriately balanced. Section B4 should however be expanded to refer to the need for the night time economy not to have an adverse impact on mixed areas which are residential and provide retail outlets alongside entertainment venues.

User:	Brent Cross Cricklewood Development Partners

Policy HC6 considers the night-time economy and Part B(1) seeks the promotion of this sector where appropriate, particularly in the Central Activities Zone, strategic areas of night-time activity, town centres, and where public transport such as the Night Tube and Night Buses are available. Similarly, Part B(3) promotes the diversification of the range of night-time activities, including extending the opening hours of existing daytime facilities such as shops, cafés, libraries, galleries and museums.

The DPs are supportive of this policy and consider that the expansion and diversification of the night-time economy will enable town centres to develop their cultural offer, which will increase their vitality and viability, as well as their contribution to the wider economy.

User:	London Borough of Ealing

The Council supports this policy.

But the Council objects to the downgrading of Southall from an area of ‘more than local significance’ in the current London Plan to a proposed ‘no classification’.

This makes little sense as continuing regeneration and development efforts improve the variety of Southall’s offer and the attractiveness of its environment and immediately before the huge boost to its accessibility that Crossrail will deliver.

User:	Natural England
When opening up greenspace to 24 hour use care should be taken to respect the existing wildlife habitats. For example, limiting lighting where appropriate to retain dark corridors for wildlife.	

User: BEE Midtown

Licensing

Our members and new businesses are keen for their employees to be able to socialise within the area as well as take opportunity of the great transport infrastructure and location that Midtown offers. We believe there is a balance that can be achieved which supports the evening and night-time economy but also respects the local community.

Camden

There is a considerable opportunity to increase the evening and night-time economy in Midtown. We welcome the Mayor's commitment to protect London's reputation as a hub for social activity. As retail footfall continues to decline in the Holborn and West End area, there is huge development potential for more sites to be used as space for leisure and hospitality venues. In doing so, we hope that this will help to increase dwell time and local spend for the borough's economy.

We are keen to work with the Mayor, Camden Council and local police forces to develop the most practically viable plans which will encourage a greater number of leisure and hospitality venues to open in the area.

Islington

Conversely, whist Farringdon is renowned for its thriving night-time economy, we believe that the area is not fulfilling its potential in regard to its evening economy offering as a result of stringent licensing policies in the borough.

We believe it's important that Islington Council take a more flexible approach on the Clerkenwell cumulative impact policy. Midtown members from across Farringdon and Clerkenwell have raised issues about obtaining the appropriate licenses – with restaurants and members clubs being refused later licenses or drinking establishments being asked to serve food with alcohol in order to be able to operate.

At present, this policy stifles potential growth in the area and we believe a more flexible approach could be taken, to allow the area to thrive as a social environment which is more in line with the Mayor’s plan for the night time economy. More work should be done to by the way of licensing deregulation to encourage more non-vertical drinking establishments to open up in the local area and have a greater combination of the types of licensed premises which are allowed to operate.

User:	Redrow Homes London Division.

The supporting text should be revisited to make more explicit that the night-time economy does not equate to alcohol-related activities.

Whilst the policy approach is generally welcomed, it will have more effect if the London Plan is more explicit about seeking a broader night-time offer.

Restaurants, cafes and community spaces for example can (and in many parts of London do) make an equivalent social contribution to pubs. This point is also relevant when applying planning policies relating to the loss of pubs.

User: Sean Creighton

The concept of a 24 hour city consigns large numbers of Londoners:

(1) to having to work anti-social hours;

(2) to minimum wages in the restaurant and bar industries;

(3) to continue to be cheated out of service charges by their employers;

(4) adds to the problems of getting to and from work;

(5) disrupted family life due to shift systems;

Bearing in mind that health and well-being need to be underpinned by an average of eight hours uninterrupted sleep, the main the benefit of a 24 hour city economy is the drinkers of alcohol, with:

(1) an increase in night-time/early hours noise of vehicles, buses, trams and trains needed to have mobility in a 24 hour city;

(2) disruption of sleep patterns pf those whose homes are along main roads, and tram and train lines;

(3) increases in alcohol fuelled anti-social behaviour.

The effects are therefore discriminatory against:

(1) all Londoners who do not have the time or the money to take part of the 24-hour economy;

(2) the growing number of Londoners who for religious or other reasons are teetotal and abstainers;

I note that Norbury District Centre is classified as NT3, an area with more than local significance Pages 481-2). This will be of considerable concern to local residents.

User: Cross River Partnership

The current Mayor’s policy for the night-time economy is welcome, as is its re-enforcement here. The policy should, however, be amended to reflect the differences between the local impact of individual night-time venues and activities, for example, those involving alcohol and those that do not. In some case, undoubtedly, the latter will be advantageous, while the former will be less so. The Policy should allow for this discretion.

From a management perspective, the impact of night-time venues and activities differs considerably depending on whether alcohol is sold on-site. Issues such as policing/security, transport, dispersal and clustering of premises are all treated differently depending on the selling of alcohol.

User:	Oneill Homer

HC6

Neighbourhood plans (especially those that are business-led) can identify and qualify the value of the local night-time economy to achieve the right scale and mix of uses per location and can negotiate local solutions with the residential community.

User: Unknown

Our client supports the Mayor’s development of a vision for the night time economy of London. Successful cities need a vibrant mix of activities and the further promotion of night-time economic activities such as eating, drinking, entertainment, shopping and spectator sports will increase London’s productivity, economic growth and social wellbeing.

Our client welcomes the Mayor’s commitment to promoting London as a 24-hour global city with the recently introduced Night Tube as a key step in unlocking the growth potential of London’s night time economy and bringing its night-time infrastructure up to international standards.

Whilst the development sector does not play a direct role in shaping the night-time economy in London, it does play a crucial role in building the vibrant places that will help these activities thrive

User:	WeAreWaterloo Business Improvement District

We Are Waterloo also wishes to voice support for Policy HC6, which aims to support the night-time economy which encourages Boroughs to develop a vision for the night-time economy that promotes its growth and diversification. BIDs are an essential part of this conversation.

User: Kingston First

In addition to increasing the range, diversity and quality of town centre uses, it also makes sense to support later operating hours. The evening and night-time economy needs to evolve. It has long been established within Inner London but not within Outer London boroughs, which continue to operate within a daytime setting. For many Londoners, this put many retail, leisure and cultural opportunities out of their reach, as many work during these times. Establishing a new evening and night-time economy will support the viability of the town centre and benefit local residents. Kingston First therefore supports the wording of draft Policy HC6.

As a Business Improvement District (BID), Kingston First is well placed to work with the Local Planning Authority to identify the constraints and opportunities in improving the evening and night time economy of Kingston Town Centre, and can work with them to develop a vision and management plan for this. It has already worked to diversify the evening economy, to include a greater range of dining and leisure venues and this has had a positive impact on footfall. Further improvements may also help to support an evening economy for retail use

User: London Borough of Camden

The Council supports the objectives of protecting and promoting the night time economy.

We recognise the very significant contributions made by night time uses to the economy, the identity and attractiveness of London and quality of life. However, many residents also live within town centres or on the edge of these areas and councils have an obligation in discharging their planning functions to determine the impact of proposed night time activities on sensitive uses, such as residential. Particular care has to be taken when it is proposed that day or evening activities are extended to the early hours of the morning. The London Plan should therefore more clearly recognise that new night time uses need to be well managed and consider of impact on local residents.

Criterion B 6) could be misinterpreted as providing unqualified support for the uses listed.

Regarding the potential implications of areas being presumed as suitable for 24 hour activities due to an existing cluster or concentration of night-time economy uses, the impacts of night time uses on residential accommodation needs to be assessed on a case-by-case basis and we agree that “boroughs should balance the needs of residents with the economic benefits of promoting a night-time economy”. This would apply to all relevant planning applications. The supporting text in paragraph 7.6.2 should be clear that this ‘balancing test’ applies regardless of whether a development is located outside or within one of the centres shown in Figure 7.7. Promotion of night time activity must also include the need to fully consider impacts on residential amenity and the locality.

The ability to intensify night time activity will also be contingent on other legislation, including licensing controls, in particular in “cumulative impact” zones. This would include Camden Town which the Draft Plan identifies as an area of “international/national significance”. The ability to deliver a “24-hour city” throughout Camden Town needs to consider licensing policy and impacts on residential amenity. As drafted, the Plan's wording creates a concern that quieter streets or areas within/near centres with a residential character are considered by the Mayor to be suitable locations for 24 hour uses, or might be put under pressure to accommodate such uses. This concern could be overcome by amending the wording to make clear that proposals for greater 24 hour working should fully consider management arrangements and the impacts on local residents.

We welcome the policy’s recognition of the economic benefits of the night time economy. Its positive social effects should also be recognised. Many night time uses including music venues, nightclubs, theatres and pubs provide immense social and cultural benefit, often allowing people from different communities and social backgrounds to meet. This contributes to London’s social integration and diversity. Some venues will also be important in providing meeting places for people with protected characteristics, e.g. older people and LGBT communities. These social benefits are acknowledged in Camden’s draft planning guidance on “Community uses, leisure facilities and pubs”. We suggest that the London Plan includes acknowledgement of both the social and economic benefits of night time uses as well as recognition of impacts on residential amenity and the character of the area. This is necessary for the decision maker to reach a balanced judgement concerning the merits of a proposed scheme.

User:	London Borough of Camden

Suggest that paragraph 7.6.2 clarifies that consideration of the acceptability of night time uses must take into account potential impacts on the amenity of those living nearby and the surrounding area, regardless of whether the proposed scheme is located within the centres shown in Figure 7.7. Particular care should be applied to 24 hour uses which are likely to have a much greater impact on residents than activities which end before/around midnight.

User:	Joy Brown
7.6.1 I fear that in the rush for employment and profit the needs of local residents will **not** be taken in to account	

User:	Mrs Jean Smith

The night time economy is not suited to outer boroughs. Noise pollution suffered by the many because a few wish to revel late into the night is unnecessary, and has no benefit to the local economy, only to the owners of the pubs and clubs. The rest of us contribute heavily to paying for tidying up their mess through our council taxes.

User: Association of Directors of Public Health

In general in this section, ADPH London would like to see stronger wording to promote good health.

We support policies boosting the night time economy, but would like to emphasise the need for the night time economy to have more options that do not involve alcohol such as bowling, dancing, arts and culture. Many policies in this section largely revolve around alcohol, and we ask the Mayor to be mindful that excessive consumption of alcohol is, of course, harmful to health.

We therefore recommend strengthening HC6 B 3) to**: diversify the range of night-time activities, creating more options that do not necessarily involve the consumption of alcohol, including extending the opening hours of existing daytime facilities such as shops, cafés, libraries, galleries and museums.**

We are supportive of integrated approaches in HC6 C) to mitigate the negative impact of licenced premises and other services, and ask if it can be emphasised more.

User:	Bexleyheath Business Improvement District

It is good to see that Policy HC6 Supporting the night-time economy does not confine the night-time economy to central London. Bexleyheath, for example, is a centre for the night-time economy within southeast London, with restaurants, pubs, bars, and nightclubs attracting a wide range of people from across the region. We welcome the identification of Bexleyheath in Figure 7.7 as a cluster of nighttime activity; however the designation as only ‘more than local’ significance is inaccurate. Bexleyheath has a sub-regional significance, and it is requested that it be designated as NT2 Regional/Sub-regional in Figure 7.7 and also in Table A1.1 of Annex 1.

User:	Public Health England

Night time economy

? Admission episodes for alcohol-related conditions - narrow definition

User: Kew Society

We support the aim to embed heritage, including archaeological sites, in planning and welcome the emphasis given to the role for Historic England.

The protection of the setting of the World Heritage site of the Royal Botanic Gardens in Kew is of particular importance to us and has been under threat from regenerative change in Hounslow. We support the regeneration of areas in Hounslow but greater sensitivity to the impact on the historic vistas from Kew and other historic assets in Hounslow needs more emphasis as well as the protection of the relationship of the Royal Botanic Gardens to the River Thames and the Arcadian landscape.

Proposals for high rise building such as the Chiswick Curve, turned down by Hounslow Council but now in appeal, should never be countenanced. Nor should other high and medium rise developments be approved, as has happened in recent years with, for example, approval of high rise enabling developments associated with the relocation and redevelopment of Brentford Football stadium and, more recently the Watermans Arts Centre on the river front.

Specific reference should be included in the new London Plan to the need to fully protect the Royal Botanic Gardens' Outstanding Universal Values (OUVs) as a World Heritage Site: http://whc.unesco.org/en/guidelines/.

Councils should be required to take full account of the Royal Botanic Gardens new World Heritage Management Plan, currently being drafted, in their Heritage Impact Assessments. The Buffer Zone to the North of the site should also be extended in order to protect this World Heritage asset. Insufficient attention to the OUVs puts at risk the World Heritage status of this major London tourist attraction.

On the references in this Chapter to the night time economy, we agree it is not suitable everywhere – it can radically alter the nature of communities and needs to be carefully considered with decisions taken locally by Boroughs.

User: London Councils

London boroughs welcome the inclusion of a dedicated Heritage and Culture section of the London Plan for the first time. Boroughs are keen to work with the GLA on improving and diversifying London's cultural offer.

As well as financial challenges faced by local government when supporting culture and the arts, London has seen many venues close in the last decade and has a limited night-time transport system offer compared to other world leading cities. With the introduction of night-tube and the introduction of Cultural Enterprise Zones, London is taking important steps to supporting and sustaining the cultural offer of the capital.

While there is broad support for the principles outlined here, challenges still remain regarding funding for the sector and managing Night Time Economy (NTE) development in a way that minimises impact on residents and neighbourhoods. London boroughs look forward to working with the GLA to develop policies that balance city-wide culture and heritage priorities with the needs of local communities and neighbourhoods.

Policy HC7 Protecting public houses

User: Mr Toby Laurent Belson

Help produce a shift in thinking so that access to and the value of community spaces is not based on business plans and income generation but on the social value of the community space and its contribution to health and wellbeing, inclusion, integration, empowerment and poverty reduction.

Recognising the irreplaceability and uniqueness of many community spaces and looking after them for future generations is part of a continuing legacy.

Valuing and resourcing community-centred knowledge and creativity for the contribution this can make to policy discussions and a whole system approach to community engagement across the GLA.

Community spaces are not just physical buildings, but social spaces where cultural expression takes place. These social spaces provide movement and interaction between different cultures and it is important they are integrated as well as truly accessible to all.

Community spaces are essential to the achievement of lifetime neighbourhoods in which housing, health and education facilities, shops and other local amenities are affordable and accessible to everyone, now and for future generations, and there is support for community networks based on social co-operation and mutual aid.

Housing estates provide a wide range of community spaces – community halls, open spaces, playgrounds and other facilities – which must be protected and their use encouraged.

User:	The Enfield Society

"The Plan proposes additional planning protection for Public Houses. This is a current concern in Enfield and the Society has been pressing Enfield Council to develop a Pubs Protection policy. **The proposals for the protection of community public houses are in the Plan are welcomed."**

User:	London Forum of Amenity and Civic Societies

London Forum **strongly supports** this policy, which provides the most comprehensive framework of protecting public houses to date.

In **paragraph** 7.7.3 the following should be added at the end ‘Consideration of the place of pubs in the history of an area should also include a review of their signs, which often give clues as to previous land ownerships or events in history, and may be of historic or aesthetic interest in their own right, and should be retained wherever possible.’

User:	Love Wimbledon BID

Pubs provide a social service to the community. They are safe, neutral meeting places and often participate in the community far more than any other business in town through sport viewing, live music, quiz nights etc

Pubs must be protected at all costs, particularly in light of the increased complaints from residents about noise from pubs that have trading there for 150 years and are run by very responsible landlords.

User: Ms Meenakshi Sharma

7.7.6

When **assessing whether a pub has heritage, cultural, economic or social value**, boroughs should take into consideration a broad range of characteristics, including whether the pub:

1. is in a Conservation Area

Given all the other criteria, why should this make a difference? This is discrimination between richer and poorer areas.

User:	Association of Licensed Multiple Retailers

UKHospitality unreservedly commends the Plan's recognition of the importance of pubs and nightclubs to London's communities, culture, economy and well-being.

In designated areas, such as the proposed Cultural Quarters, this value - and the sustainability of the venue - could be safeguarded by optimising the commercial environment for such businesses. With the most prominent burden being business rates, exemptions, reductions or reliefs in such areas would make a massive difference to such businesses.

User: Alliance for Childhood

Protecting the heritage of existing public houses which have cultural value is important. It is less clear whether new proposals come under this category. This needs to be approached with care as new public houses would be part of a new culture with possible negative impacts especially for the welbeing of children and young people.

1. 2) support proposals for new public houses (and other similar drinking establishments) should be considered **in a balanced way taking into account efforts** to stimulate town centre regeneration, cultural quarters, the night-time economy and mixed-use development **and the statement of licensing policy for the local area, to ensure that proposals deliver benefits to the community and avoid negative impacts.**

Other cultural infrastructure buildings including community centres, youth clubs, play areas and free play infrastructure serve a similar role, supporting the existing community culture and heritage and should also be included. Preventing the disappearance of a community's cultural centres is as important to the local community culture over generations as protecting public houses.

User:	Putney Society

Policy HC7 - Protecting public houses
HC7.A.1 and HC.7.C .strongly support the case for retaining public houses for their heritage, economic, social and cultural value. We are pleased to note that Wandsworth has designated all pubs as ACVs, and introduced an Article 4 Direction removing Permitted Development rights for change of use. This could be adopted by the GLA, or other Boroughs asked to do likewise.

User:	The Pinner Association
Support as being important to protect the character and vitality and viability of town and district centres.	

User:	Royal Borough of Kensington and Chelsea

7.6 Policy HC7 Protecting public houses

We note the positive recognition of social value to local communities. We welcome the rigidity at HC7. B.

User:	National Trust London

Policy HC2 World Heritage Sites, **Policy HC5 Supporting London's culture and creative industries**, **Policy HC6 Supporting the night-time economy**, and **Policy HC7 Protecting public houses** are all welcomed and supported by the National Trust in London. They are especially noted for the breadth of heritage they seek to preserve and promote, fostering a more inclusive understanding of heritage that reflects the diversity of Londoners (7.5.4) (7.6.11) (7.7.2).

User: Musicians Union London

The MU welcomes Policy HC7 and the encouragement of a positive approach to designating pubs as Assets of Community Value. The closure of pubs can be damaging to local communities and economies particularly when the community or cultural offering of the venue is not replaced. London has lost too many pubs that served as vibrant grass-roots music venues to property developers over the years. Many musicians start out by playing in pubs. These types of small grassroots venues continue to be the industry entry point for most emerging musicians and London's role in incubating talent has made it potentially the most successful city in the world at developing new music.

We are also pleased that the unique nature of some pubs to certain groups such as the LGBT+ community has been recognised and we hope will factor into the decisions of planning and licensing departments as and when such venues are put under threat.

As entry prices to pub gigs are usually low or often free this provides a valuable opportunity to build local audiences and give inclusive access to culture. These gigs can also attract audiences from further afield who put money into the local economy on those evenings by visiting other local restaurants, shops etc.

User:	Battersea Society Planning Comittee

We endorse the proposals set out in the following and trust that action will be taken without delay.

User: London Borough of Islington

Chapter

Heritage and Culture

Draft London Plan Policy

Policy HC7 Protecting public houses

Islington Response

The council are supportive of the draft London Plan public houses policy and welcome the extension of this policy to address the promotion of new public houses as well as the protection of existing ones. While determination of a planning application can have consideration of licensing, the existence of a cumulative impact zone does not give license to refuse a planning application outright.

Para 7.7.5 refers to Assets of Community Value. As noted in our response to policies S1 and HC5, while ACV can have material planning weight, they are not in themselves effective protection of a specific use, and there should be a strong caveat to this effect in the supporting text.

Para 7.7.6 lists a broad range of characteristics that can determine whether a pub has specific value. There should be explicit recognition that these characteristics are not exhaustive and there may be other valid considerations.

We support the requirement as stated in the draft London Plan for two years of marketing evidence to show that the building being used as a pub is no longer viable. The council already require 24-month marketing (and vacancy) period when assessing the change of use of a pub, so inclusion in the London Plan is welcome.

User: CAMRA (Campaign For Real Ale)

1. At 7.7.1 and 7.7.3 we welcome recognition of the role of unique individual's pubs at the heart of local communities. The Chestham Arms in Homerton and the Ivy House in Nunhead are two examples of back-street pubs that are now once again thriving thanks only to massive popular campaigns against the threat of their closure by developers who had acquired the freeholds. The reaction of boroughs to developers' plans in such instances should be to say 'NO', rather than to work with the developer to arrive at a plan for some other use that may eventually be approved.

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User: CAMRA (Campaign For Real Ale)

1. With permitted development rights at last rescinded, as noted at 7.7.2, it becomes all the more important for boroughs to take a tough line in response to destructive planning applications. Sadly, we lost both the Morden Tavern, a pub that would otherwise have qualified for an English Heritage listing, and more recently the Grosvenor in Stockwell, in cases where Councillors had belatedly opposed development proposals on which officers had initially been supportive, only for the Planning Inspectorate to allow the developers' appeals.

User:	CAMRA (Campaign For Real Ale)

1. We support the call at 7.7.4 for new pubs to be planned especially within redevelopment or regeneration schemes but boroughs should also be encouraged to look at the range of free-of-tie operators in the market rather than defaulting to the national pub chains.

User:	CAMRA (Campaign For Real Ale)

1. Paragraph 7.7.5 rightly recognises that ACV designation, though not a prerequisite for removal of permitted development rights, retains some importance for planning. Specifically, boroughs may, and we believe should, regard ACV designation as a material planning consideration om determining any planning application, albeit the absence of ACV designation does not mean that a pub is necessarily of any less social or community value. And if an owner/developer is refusing to accept a realistic community bid for a pub but opting instead to leave it empty and deteriorating, the legislation rightly provides for the possibility of compulsory purchase.

User:	CAMRA (Campaign For Real Ale)

1. Paragraph 7.7.6 provides an ample, non-exhaustive list of characteristics a borough should take into account in response to any application involving loss or diminution of a pub.

User: CAMRA (Campaign For Real Ale)

1. Missing from 7.7.7 in our view is a recommendation that the pub have been marketed for the requisite length of time not only at an independently agreed price and in functional condition but also free of tie. At present the law allows now only brewers, who might have a justifiable interest in selling their own products, to restrict the products their publicans can sell, but also property owners at large, whose interest in rendering a pub unviable will be well served by tying the publican to an exclusive, expensive supplier of an unappealingly limited range of beverages. The Grosvenor in Stockwell, again, was a case point.

User: CAMRA (Campaign For Real Ale)

1. We strongly endorse the warnings at 7.7.8 of the threat of ‘trojan horse’ conversion. All over London there are former pubs (and some new developments, such as the buildings that replaced the Jolly Gardeners in Clapham and the Castle in Battersea) now empty on ground and basement floors pending eventual replacement of what had plausibly been earmarked as pubs by more profitable shops or flats. (Missing from this paragraph is any recognition of the prevalence of supermarket convenience stores selling cheap alcohol over long hours for consumption off the premises in what had been pubs where responsible drinking in moderation was responsibly supervised.)

2. However, the ‘or ensure’ option in the last sentence of the paragraph provides insufficiently robust guidance and could in practice give developers an easy get out. In our experience noise containment seldom works; there is no substitute for ancillary accommodation and self-contained freehold pubs. Having a lockup only option will restrict the market substantially to a tiny minority of (typically managed) operators. We are rapidly losing the traditional tenanted or freehold public house due to this constant splitting of planning units, which then never join up again into one whole pub.[RS1]

[RS1]7.7.8

User:	UK Music
We welcome Policy HC6 with regard to supporting the night-time economy and Policy HC7 on protecting Public Houses.	

User:	Galliard Homes

We understand what the aspiration of Policy HC7 – Protecting public houses is seeking to achieve, however we feel that this policy, as worded, goes beyond the strategic remit of the Plan. We acknowledge the Plan should encourage the protection of such locations / uses, but not all public houses make positive community contributions. Therefore the policy should outline strategic criteria for local authorities to be mindful of when assessing planning applications that promote the loss of the public house, as part of their Local Plan.

User:	City of London Corporation

The City Corporation welcomes the protection of public houses. The City of London has a strong heritage of public houses which provide valued facilities for the diverse range of the City community, including residents, workers and visitors.

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Paragraph C is also welcome in recognising that the re-development of ancillary accommodation can threaten the continued viability and vitality of a public house, for example, by reducing the potential to accommodate live music or sport. The policy should support the better use of ancillary space for complementary use, for example, for dining, for music/performance space or even affordable office accommodation or tourist accommodation, which would support the viability of the host pub.

In protecting public houses, the policy should clarify that evidence that a pub has been poorly managed (intentionally or otherwise), should not be taken into consideration when assessing the viability of a pub.

User:	London Borough of Barnet

We support policy protection for existing public houses where they have a heritage, economic, social or cultural value and where they contribute to wider policy objectives for town centres and the night-time economy. Supporting proposals for new public houses should however be applied with caution and where necessary, permission should be granted following a review of local health needs and issues4. Additionally, the Mayor should explore the possibility of supporting The Best Bar None Scheme as a condition for new Public Houses5. This will also promote London Plan Policy HC6.

User: London Assembly Labour Group

Suggested changes

“who may use this as a focus point” should be added to HC7A1 so it now reads “protect public houses where they have a heritage, economic, social or cultural value to local communities who may use this as a focus point, and where they contribute to wider policy objectives for town centres, night-time economy areas and Creative Enterprise Zones”

Justification for policy recommendations
To avoid losing those pubs which have a strong link with the community, for example, the LGBT community who often feel safer having their own space.

Suggested changes

“who may use this as a focus point” should be added to HC7A1 so it now reads “protect public houses where they have a heritage, economic, social or cultural value to local communities who may use this as a focus point, and where they contribute to wider policy objectives for town centres, night-time economy areas and Creative Enterprise Zones”

Justification for policy recommendations

To avoid losing those pubs which have a strong link with the community, for example, the LGBT community who often feel safer having their own space.

Suggested changes

“or reopening” and “for similar recreational community uses” should be added to HC7A2 so it now reads “support proposals for new or reopening public houses to stimulate town centre regeneration, cultural quarters, the night-time economy and mixed-use development for similar recreational community uses, where appropriate.”

Justification for policy recommendations

So that pubs can be reopened instead of new ones created.

User: Stonewall Housing

Stonewall Housing's services deliver support and advice about a range of issues as well as housing, for example, mental health, work-ready and financial hardship. We welcome that the London Plan seeks to protect the community assets for communities in the shape of commercial venues, such as public houses (**POLICY HC5** and **POLICY HC7**), however we believe that London needs community spaces for our communities that do not centre on the intake of alcohol or night-time time economy. Rather, more day-time, community spaces are needed for our communities to meet and support each other, especially since many do not have the support of family. The London Plan should recommend the strategic engagement with LGBT communities to develop the spaces that are needed by them and the organisations that support them (especially since we, like women's groups and BAME people, face the pressures of high cost office and meeting space in the city (**POLICY E2** and **POLICY E8**).

User:	London Borough of Lambeth
Lambeth supports this policy.	

User:	London Borough of Haringey
The Policy is supported and provides further weight to existing local policy.	

User: London Borough of Barking & Dagenham

The Council supports the protection of public houses where they have a heritage, economic, social or culture value to local communities. The term ‘authoritative marketing’ should be extended to set out a minimum amount of time the marketing should be undertaken. The Council’s policy requires 12 months marketing for a pub use at price agreed with the Council following an independent professional valuation and if this is unsuccessful 12 months marketing for community uses. 24 months of marketing evidence would be sufficient to allow for sufficient time for marketing to be undertaken. This will incentivise land owners and pub operators that the planning system is taking a tough line on retention and this would hopefully lead to investment.

Whilst public houses can be beneficial to wellbeing and social infrastructure. We suggest that the London Plan should state that proposals for new public houses be considered on their own merit and should be contingent on an assessment of the cumulative impact of licensed properties.

User:	London Borough of Lewisham

We support HC7 as it encourages refusal of schemes that result in the loss of public houses. This reflects the strong approach that we are taking to protect public houses in our borough.

User: London Borough of Brent

The Council supports this policy. There does however have to be a recognition that some areas with a high concentration of drinking establishments also create characteristics that can have a potential adverse impact on the perception of town centres and how welcoming they are for parts of communities, as well as also having health impacts. As such support for additional pubs is on the basis that such establishments are well considered and take account of the existing and potential context within which they sit.

Amend text to:

A 2) support well considered proposals for new public houses to stimulate town centre regeneration, cultural quarters, the night-time economy and mixed-use development, where appropriate taking account of potential cumulative impacts associated with their concentration

User:	London Borough of Bromley

Bromley is concerned that the policy requires a longer marketing period than Bromley's draft Policy 23 Public Houses and the impact this longer period may have in respect of vacancies, the character of the locality and on the vitality and viability of town centers.

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User: London Councils

This policy suggests boroughs should protect public houses where they have a heritage, economic, social or cultural value and supports proposals for new public houses to stimulate town centre regeneration, cultural quarters, the NTE or mixed-use development. The plan states applications that propose the loss of public houses should be refused unless there is authoritative marketing evidence that demonstrates that there is no realistic prospect of the building being used as a pub in the foreseeable future.

Whilst we welcome the protection of public houses, one or more of these values could be prescribed to any public house. The plan should consider scenarios where the loss of a public house could be of benefit, such as in the development of a larger cultural or NTE offer within an area. Boroughs have in many cases supported the retention of public houses in specific and general terms and will continue to do so at a local level.

User: Old Bermondsey Village Neighbourhood Forum

Aside from a marked reduction in the importance given to neighbourhood planning, our overarching criticism is that there is no clear instrument that checks development targets demanded of local authorities (especially in Opportunity Areas) by policies GG2, H1, H2, D6 and D8 against the importance of the preservation and enhancement of the social and built fabric of London highlighted in policies H5, H6 HC1, HC3, HC5, and HC7.

We think there is a need to balance the opportunities offered to local authorities in the DLP by way of identifying, protecting and nurturing the distinct identity of areas as the basis for sustainable development versus the potential abuse of these opportunities by planning departments – in particular where potential exists for opportunity areas, site allocations and cultural quarters to become used as guises for insensitive profit driven high-rise and monouse (housing dominated) development.

Neighbourhood Forums should be empowered to have a better part to play in this by the DLP.

The New Southwark Plan for example has just completed formal consultation ignoring widespread calls for a borough wide local list. It contains deeply unsound Area Visions and Site Allocation Policies that ignore local consultation and make no reference to key guidance like Historic England’s Advice Note 3 for example.

User:	London Borough of Tower Hamlets

We support proposals for new public houses to stimulate town centre regeneration, cultural quarters, the night-time economy and mixed-use development, where appropriate.

User:	Royal Borough of Kingston
Support. It is noted that some of the measures are relevant to licensing rather than planning and this should be clarified in the text.	

User:	London Borough of Hillingdon

The protection of public houses is supported, but changes are required to policies that seek to protect heritage assets.

User:	London Borough of Hackney

Hackney supports this policy however would welcome a definition of public houses in the glossary or supporting text to distinguish a public house from other drinking establishments, such as a bar. Clarification would also be welcome regarding whether the intention is to protect the public house use or the building, and whether the policy would apply to former public houses.

User:	London Borough of Hounslow

LB Hounslow supports the approach taken by the plan to managing London’s Heritage and Culture in a way which compliments growth. Policy HC7 should clearly define what authoritative marketing evidence means in the case of public houses. The use of pubs as a contributor to town centre regeneration is supported.

User: Westminster City Council

We support the principle of policy support for protection of public houses where local planning authorities consider this is appropriate. However it follows from our response to draft policy HC6 that the Mayor should not seek to apply a blanket approach which might, for example, inhibit moves to diversify the evening/night-time economies from alcohol-based activities.

For the same reason we would question the general support for new pubs in criterion A(2). Experience provides little evidence for the regenerative benefits of pubs suggested here. If they do have such effects (and it is noticeable that no evidence is brought forward to support this proposition – the GLA Economics report “Closing Time” talks about pubs being “under increasing pressure for survival”) why is a policy required for their protection? Again, this is an issue that should be approached in light of local circumstances and needs. We would suggest criterion A(2) is omitted.

As already pointed out, administration of assets of community value is not a matter for the Mayor; in any case paragraph 7.7.5 gives a misleading account of the process (it does not, for example, mention the wide range of exemptions that apply to the moratorium provisions). Experience shows that this is an area in which a gloss of this nature is positively misleading and we would suggest it is deleted. Similarly, local planning authorities are unlikely to need to be instructed about the characteristics that should be taken into account in deciding whether a pub has particular value (paragraph 7.7.6); and any list of this kind is bound to overlook matters that are important in particular cases. This kind of list may actually be used against authorities seeking to protect pubs if they rely on a factor not on the list. We would suggest its omission.

Similarly, local planning authorities should be able to decide for themselves what period would be realistic to require marketing before a pub is developed, depending on the state of the local property market. Two years can be a very long period to leave a building vacant and no evidence has been brought forward to suggest this is the optimum period.

Again, this policy could be easily condensed - it is not clear what criterion A(1) adds to the generality of criterion B.

User:	London Borough of Southwark

This policy supports the protection of pubs for their heritage, economic, social and cultural value. The policy is consistent with Southwark's strong policies to protect pubs in the New Southwark Plan. The council brought in an Article 4 Direction prior to the change in the GDPO which assessed Southwark's pubs for similar criteria outlined in paragraph 7.7.6 and outlines the strong commitment to securing the continued use and value of pubs.

Part B of the policy requires authoritative marketing evidence to be submitted for applications that propose the loss of public houses and the supporting text requires 24 months of marketing following an independent valuation. It is suggested that this requirement could be incorporated into the policy itself to strengthen this requirement.

User:	London Borough of Redbridge

We support this policy, which broadly accords with our on protecting community facilities. Outer London has particular challenges in this respect, partly because of demographic reasons and partially because of the suitability of many pubs as housing sites when the existing use value may be low. It would be useful for the supporting text to provide more guidance on what timescale is meant by “foreseeable future”.

User: London Borough of Wandsworth

The policy for protection of London’s public houses is welcomed albeit the Council has taken the lead in London protecting its public houses by already introducing a public house protection Article 4 Direction which has ultimately led to changing the national regulations to remove permitted development rights for public houses.

It is considered that the permitted development right changes put the onus on Councils to establish an evidence base to protect its pubs where they consider necessary to do so without the need for a strategic policy on this matter.

User:	Shaftesbury

Shaftesbury has many existing and former public houses uses within our portfolio. The policy supports proposals for new public houses which will assist with the conversion of restaurants back to their original public house use. Shaftesbury has already successfully converted a small number of restaurants back to their former use prior to this policy through National Policy incentives (CAMRA, NPPF). We therefore support this policy as long as the recognition remains that upper floors can be converted to alternative uses if the commercial public house use is not significantly adversely affected.

User:	London Borough of Richmond Upon Thames

The policy for protection of London’s public houses is welcomed.

User:	London Borough of Harrow
The Policy is supported and provides further weight to existing local policy.	

User:	Royal Borough of Greenwich

Welcome the recognition of the important role that public houses can have in a local area, and the proposed approach aligns with that currently taken in RBG's Local Plan. To strengthen the policy for protecting public houses, recommend that assessment of heritage/cultural/economic/social values (set out in 7.7.6) should be made a requirement and added to policy HC7A(1) so that there is an impetus for boroughs to identify pubs of value to local communities prior to development proposals coming forward. This would strengthen the protection for public houses.

User:	London Borough of Havering

Havering supports this policy as the borough has lost a number on notable public houses in recent years.

User: Mama Ujuaje

HC7 recommended wording:

1. protect public houses and all community entertainment and cultural venues where they have a heritage, economic, social or cultural value to local communities, and where they contribute to wider policy objectives for town centres, night-time economy area, Creative Enterprise Zones ***including community food hubs***

2. support proposals for new public houses ***and community cultural centres*** to stimulate town centre regeneration, cultural quarters, the night-time economy and mixed-use development, where appropriate.

B. Applications that propose the loss of public houses ***or community centres*** with heritage, cultural, economic or social value should be refused unless there is authoritative marketing evidence that demonstrates that there is no realistic prospect of the building being used as a pub or community centre in the foreseeable future.

C. Development proposals for redevelopment of associated accommodation, facilities or development within the curtilage of the public house ***or community centre*** that would compromise the operation or viability of the public house or community centre use should be resisted.

7.7.1

Pubs are one of the cultural institutions that are a unique and intrinsic part of Britain. Other important institutions include those that fulfil a similar role in society for other cultures, such as community meeting places at which are held regular social or cultural events, places of worship and entertainment venues used by different sectors of the community over the course of the week at different times of the day. Many such places are steeped in history and are part of London's built, social and cultural heritage. Whether alone, or as part of a cultural mix of activities or venues, pubs as well as such the named social institutions, are often an integral part of an area's day, evening and night-time culture and economy. An individual social institution can also be at the heart of a community's social life often providing a local meeting place, a venue for entertainment or a focus for social gatherings. More recently, some ***such institutions*** have started providing library services and parcel collection points as well as food in different forms to increase their offer and appeal to a wider clientele.

7.7.2

Through their unique and varied roles, pubs ***and community centres*** can contribute to the regeneration of town centres, Cultural Quarters and local tourism, as well as providing a focus for existing and new communities, and meeting the needs of particular groups, such as the LGBT+ community ***and London's diverse ethnic communities.*** However, pubs ***and other community centres critical to the maintenance and survival of London's diverse cultures*** are under threat from closure and redevelopment pressures, with nearly 1,200 pubs in London lost in 15 years[100] **(insert statistic on loss of community centres in London).** The recent changes to the Town and Country Planning Act (General Permitted Development Order) (England) (2015) have however, removed permitted development rights that previously allowed pubs and bars to change planning Use Class to shops, financial and professional services, restaurants and cafés without prior planning approval. This change in legislation offers greater protection for pubs and also incorporates a permitted development right that allows pub owners to introduce a new mixed use (A3/A4) which should provide flexibility to enhance a food offer beyond what was previously allowed as ancillary to the main pub or community centre use. ***Similar legal support is also required to protect the use of a variety of buildings, located on high streets, within town centres and within estates from encroachment by other uses that make community venues less accessible to ordinary people and unable to offer a greater variety of services which would improve their viability and attractiveness in ways which support social cohesion, resilience and integration.***

7.7.3

Many pubs ***and community centres*** are popular because they have intrinsic character. This is often derived from their architecture, their long-standing use as a public house and hub of community action, their history as a place of socialising and entertainment catering for particular groups, their ties to local sports and other societies, or simply their role as a meeting place for the local community. In developing strategies and policies to enhance and retain pubs, boroughs should consider the individual character of pubs ***and community centres*** in their area and the broad range of characteristics, functions and activities that give ***pubs and community centres*** their particular value, including opportunities for flexible working.

7.7.4

New pubs ***and community centres***, especially as part of a redevelopment or regeneration scheme can provide a cultural and social focus for a neighbourhood, particularly where they offer a diverse range of services, community functions and job opportunities. However, it is important when considering proposals for new pubs ***and community centres*** that boroughs take account of issues such as cumulative impact zones, the Agent of Change principle (see Policy D12 Agent of Change) and any potential negative impacts.

7.7.5

Boroughs should take a positive approach to designating pubs ***and community centres*** as Assets of Community Value (ACV) when nominated by a community group. Listing a pub or community centre as an ACV gives voluntary groups and organisations the opportunity to bid for it if it is put up for sale. The ‘right to bid’ is not a right to buy and although owners of the asset have to consider bids from community groups, they do not have to accept them. An ACV listing does, nevertheless, give communities an increased chance to save a valued pub or other local facility.

7.7.6

When assessing whether a pub or community centre has heritage, cultural, economic or social value, boroughs should take into consideration a broad range of characteristics, including whether the building

a. is in a Conservation Area
b. is a locally- or statutorily-listed building
c. has a licence for entertainment, events, film, performances, music or sport
d. operates or is closely associated with a sports club or team
e. has rooms or areas for hire
f. is making a positive contribution to the night-time economy
g. is making a positive contribution to the local community
h. is catering for one or more specific group or community.

7.7.7

To demonstrate authoritative marketing evidence that there is no realistic prospect of a building being used as a pub ***or community centre*** in the foreseeable future, boroughs should require proof that all reasonable measures have been taken to market the pub ***or community centre*** to other potential operators. The pub ***or community centre*** should have been marketed for at least 24 months as a pub **community centre** at an agreed price following an independent valuation and in a condition that allows the property to continue functioning as a pub ***or community centre***. The business should have been offered for sale locally and London-wide in appropriate publications and through relevant specialised agents.

7.7.8

Many pubs ***or community centres*** built on more than one floor include ancillary uses such as function rooms and staff accommodation. Potential profit from development makes the conversion of upper pub ***or community centre*** floors to residential use extremely attractive to owners. Beer gardens, ***community gardens*** and other outside spaces are also at risk of loss to residential development. The change to residential use of these areas can limit the operational flexibility of the pub ***or community centre***, make it less attractive to customers, and prevent ancillary spaces being used by the local community. It can also threaten the viability of a pub ***or community venue*** through increased complaints about noise and other issues from new residents. Boroughs are encouraged to resist such proposals or ensure developers put in place measures that would mitigate the impacts of noise for new and subsequent residents.

User:	TUC London, South East and East of England

Policy HC7: Protection public houses

1. Pubs are an important component of the character of London and are an asset for residents, workers and visitors, but the sites they occupy are under threat from developers, so the London Plan is right to require boroughs to protect them, when appropriate.
2. Pubs can support community identity, cohesion, be used to address social isolation and support skills development, acting as community hubs, especially in areas that are remote from existing social infrastructure and transport links. Planning applications for such community assets should be nurtured.

User: Just Space

Policy HC 7 Protecting public houses

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

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

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

Changes

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

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

User:	London Healthier Places

When well managed and maintained, pubs can be an asset to the local community. Where appropriate, pubs should be retained and, as such, the LHP Network supports Policy HC7 part A 1.

Part A 2, however should be amended to: " Proposals for new public houses (and bars) should be contingent to an assessment of the cumulative impact of licensed premises in any neighbourhood. The merits and any potential negative impacts on health and wellbeing and other social impacts should be considered on a case by case basis".

User:	Pilbrow & Partners
Subsection B to be redrafted to amend “foreseeable future” to be specific in timeframe to align with that advised in paragraph 7.7.7	

User: London NHS Clinical Commissioning Group

Policy HC7 Protecting Public Houses

Whilst we recognise the value of existing public houses, we suggest that clause A (2) of this policy is deleted as it does not add to the protection of public houses and potentially could exacerbate issues created by significant concentrations of licensed premises. There are other policies in the draft plan which support existing and new public houses adequately. These include for example, Policy HC6 Supporting the night-time economy which in B 6) protects and supports pubs together with other venues and facilities.

User:	Kingston and Surbiton Constituency Labour Party

We welcome the protection of pubs which serve the community (7.7.6); Kingston has lost three to student accommodation in recent years.

User: Zbig Blonski

Contradictory approaches to hot food takeaways (Policy E9) and protecting public houses (Policy HC7)

54.Policy E9 places restrictions on the location of hot food takeaways on health grounds yet it supports the protection of public houses. Recent studies have shown that the consumption of alcohol has wide ranging damaging impacts on the quality of health and longevity. This not only relates to alcoholism and the damage to liver and other organs but also mental capacity and onset of dementia. It has also been linked to the development of cancers.

55.The use of hot food takeaways and public houses is a matter of personal choice. The Plan proposes to interfere with this in an uneven way. There are entirely suitable and appropriate land use ways of exercising controls over hot food takeaways. This policy should be deleted. Also it is not a strategic issue and the London Plan should not be addressing such a matter.

User:	Hammersmith and Fulham Historic Buildings Group

HC7
The HBG thoroughly endorses this policy as Hammersmith and Fulham has lost many pubs in recent years. New uses varying, from estate agents, to public residences and mini supermarkets. Where these buildings have listed or locally listed status the signage, facade, etched glass etc should be retained. These historic details help provide a focus within the street scene

User: Silvertown Homes

Policy HC7 refers throughout to pubs, which is one type of Class A4 drinking establishments.
Several of the tests set out in paragraph 7.76 fail to recognise that circumstances change.
References to ‘heritage, economic, social or cultural value’ closely resemble the criteria for listing buildings.

As acknowledged in the London Plan, pubs benefit from a degree of protection under the General Permitted Development Order and many will also be subject to additional planning constraints through designation as a heritage asset. The reference to heritage, economic, social or cultural value’ should be revisited.

The ‘Principle of Selection for Listed Building’ (2010) confirms that there are two criteria for the Secretary of State determining that a building should be added
to the statutory list: ‘Architectural Interest’ and ‘Historic Interest’. The latter is defined as follows:

‘To be of special historic interest a building must illustrate important aspects of the nation’s social, economic, cultural, or military history and/or have close historical associations with nationally important people. There should normally be some quality of interest in the physical fabric of the building itself to justify the statutory protection afforded by listing’.
The draft London Plan implies there is a tier of value that might fall short of listing but which should be protected. This risks misleading Londoners and what is actually achievable through the planning system.

The London Plan must recognise the limits of planning policy. Very little protection can be applied to activities taking place within a pub if it operates within the Class A4 or A3/A4 mixed use permitted by the GPDO.

For example, under paragraph 7.7.6 a pub might currently be associated with a ‘sports club or team’ but there will surely be very few if any instances in which a change in management approach that sees this association lost would require planning permission. The inclusion of this statement in the draft London Plan can only be counter-productive as operators may come to believe that any association with a sports club or team effectively devalues their pub as an asset.

User:	London Borough of Sutton

SUPPORT WITH CONDITIONS. The London Borough of Sutton supports Policy HC7 which is similar to the council's policy in its emerging Local Plan and both policies have been bolstered by recent changes to permitted development rights.

However, once again, the
council questions whether this is really a strategic matter and suggests the problem of protecting public houses would be better solved at the borough level where local circumstances can be incorporated.

User: Dr Chris Nightingale

We value the extra protection for public houses that is promised in this plan. We consider it vital that the proposed requirements for 'marketing evidence' stated in section 7.7.7 are not diluted in any way in the translation of these proposals into the final plan. The temptations offered by the present and future property market to convert, or even demolish, public houses must be resisted because so much has already been lost with the hitherto high closure rate.

Our experience in raising ACVs for two local pubs in Chipping Barnet, is that “Community right to bid” has been an unfortunate title to this section of the Localism Act 2011. Whenever the subject has been discussed at public meetings, the response has invariably been “Can we afford it?” This is a distraction from the main purpose of the Act which is to prevent the sale of an ACV in the first place. Because the ACV has to be listed on the property deeds, it informs any planning process should the freeholder decide to change its use. This in turn renders the asset less useful to a developer, and may reduce the asset’s market value.

We raised the ACVs without even contemplating a bid to buy, which in any case we could not afford. We ask therefore that greater emphasis should be placed on the designation’s powerful effect on the planning process rather than the bid aspect. We believe that this would perfectly compliment the stated objective in the London Plan, i.e. to prevent the development of our public houses.

User:	London Borough of Newham

Policy HC7 Protecting public houses

In general Policy HC7 is considered to be complementary to Newham's Draft Revised Local Plan.

It is noted that there is limited detail regarding preferred alternative uses. In the case of Newham's Draft Revised Local Plan (Policy 2b(iv)) there is a preference to protect the pubs for alternative community benefits which have a similar catchment. It is therefore recommended that Policy HC7 and the supporting statement is amended to seek the continuation of uses with community benefits where pubs are no longer viable.

It is also considered that this policy would be better located within the Social Infrastructure chapter of the Plan.

User: CFGN Community Food Growers Network

Suggested re-wording

HC7

A. Boroughs should:

1. protect public houses and all community entertainment and cultural venues where they have a heritage, economic, social or cultural value to local communities, and where they contribute to wider policy objectives for town centres, night-time economy area, Creative Enterprise Zones ***including community food hubs***

2. support proposals for new public houses ***and community cultural centres*** to stimulate town centre regeneration, cultural quarters, the night-time economy and mixed-use development, where appropriate.

B. Applications that propose the loss of public houses ***or community centres*** with heritage, cultural, economic or social value should be refused unless there is authoritative marketing evidence that demonstrates that there is no realistic prospect of the building being used as a pub or community centre in the foreseeable future.

C. Development proposals for redevelopment of associated accommodation, facilities or development within the curtilage of the public house ***or community centre*** that would compromise the operation or viability of the public house or community centre use should be resisted.

7.7.1

Pubs are one of the cultural institutions that are a unique and intrinsic part of Britain. Other important institutions include those that fulfil a similar role in society for other cultures, such as community meeting places at which are held regular social or cultural events, places of worship and entertainment venues used by different sectors of the community over the course of the week at different times of the day. Many such places are steeped in history and are part of London's built, social and cultural heritage. Whether alone, or as part of a cultural mix of activities or venues, pubs as well as such the named social institutions, are often an integral part of an area's day, evening and night-time culture and economy. An individual social institution can also be at the heart of a community's social life often providing a local meeting place, a venue for entertainment or a focus for social gatherings. More recently, some ***such institutions*** have started providing library services and parcel collection points as well as food in different forms to increase their offer and appeal to a wider clientele.

7.7.2

Through their unique and varied roles, pubs ***and community centres*** can contribute to the regeneration of town centres, Cultural Quarters and local tourism, as well as providing a focus for existing and new communities, and meeting the needs of particular groups, such as the LGBT+ community ***and London's diverse ethnic communities.*** However, pubs ***and other community centres critical to the maintenance and survival of London's diverse cultures*** are under threat from closure and redevelopment pressures, with nearly 1,200 pubs in London lost in 15 years[100] **(insert statistic on loss of community centres in London).** The recent changes to the Town and Country Planning Act (General Permitted Development Order) (England) (2015) have however, removed permitted development rights that previously allowed pubs and bars to change planning Use Class to shops, financial and professional services, restaurants and cafés without prior planning approval. This change in legislation offers greater protection for pubs and also incorporates a permitted development right that allows pub owners to introduce a new mixed use (A3/A4) which should provide flexibility to enhance a food offer beyond what was previously allowed as ancillary to the main pub or community centre use. ***Similar legal support is also required to protect the use of a variety of buildings, located on high streets, within town centres and within estates from encroachment by other uses that make community venues less accessible to ordinary people and unable to offer a greater variety of services which would improve their viability and attractiveness in ways which support social cohesion, resilience and integration.***

7.7.3

Many pubs ***and community centres*** are popular because they have intrinsic character. This is often derived from their architecture, their long-standing use as a public house and hub of community action, their history as a place of socialising and entertainment catering for particular groups, their ties to local sports and other societies, or simply their role as a meeting place for the local community. In developing strategies and policies to enhance and retain pubs, boroughs should consider the individual character of pubs ***and community centres*** in their area and the broad range of characteristics, functions and activities that give ***pubs and community centres*** their particular value, including opportunities for flexible working.

7.7.4

New pubs ***and community centres***, especially as part of a redevelopment or regeneration scheme can provide a cultural and social focus for a neighbourhood, particularly where they offer a diverse range of services, community functions and job opportunities. However, it is important when considering proposals for new pubs ***and community centres*** that boroughs take account of issues such as cumulative impact zones, the Agent of Change principle (see Policy D12 Agent of Change) and any potential negative impacts.

7.7.5

Boroughs should take a positive approach to designating pubs ***and community centres*** as Assets of Community Value (ACV) when nominated by a community group. Listing a pub or community centre as an ACV gives voluntary groups and organisations the opportunity to bid for it if it is put up for sale. The ‘right to bid’ is not a right to buy and although owners of the asset have to consider bids from community groups, they do not have to accept them. An ACV listing does, nevertheless, give communities an increased chance to save a valued pub or other local facility.

7.7.6

When assessing whether a pub or community centre has heritage, cultural, economic or social value, boroughs should take into consideration a broad range of characteristics, including whether the building

a. is in a Conservation Area
b. is a locally- or statutorily-listed building
c. has a licence for entertainment, events, film, performances, music or sport
d. operates or is closely associated with a sports club or team
e. has rooms or areas for hire
f. is making a positive contribution to the night-time economy
g. is making a positive contribution to the local community
h. is catering for one or more specific group or community.

7.7.7

To demonstrate authoritative marketing evidence that there is no realistic prospect of a building being used as a pub ***or community centre*** in the foreseeable future, boroughs should require proof that all reasonable measures have been taken to market the pub ***or community centre*** to other potential operators. The pub ***or community centre*** should have been marketed for at least 24 months as a pub **community centre** at an agreed price following an independent valuation and in a condition that allows the property to continue functioning as a pub ***or community centre***. The business should have been offered for sale locally and London-wide in appropriate publications and through relevant specialised agents.

7.7.8

Many pubs ***or community centres*** built on more than one floor include ancillary uses such as function rooms and staff accommodation. Potential profit from development makes the conversion of upper pub ***or community centre*** floors to residential use extremely attractive to owners. Beer gardens, ***community gardens*** and other outside spaces are also at risk of loss to residential development. The change to residential use of these areas can limit the operational flexibility of the pub ***or community centre***, make it less attractive to customers, and prevent ancillary spaces being used by the local community. It can also threaten the viability of a pub ***or community venue*** through increased complaints about noise and other issues from new residents. Boroughs are encouraged to resist such proposals or ensure developers put in place measures that would mitigate the impacts of noise for new and subsequent residents.

User: Footwork Architects Limited

Principle 2

Social infrastructure, both formal and informal, must be assessed and its value understood so that it can be protected where it exists, or provided for within new development plans and proposals

Description:

‘Informal' social infrastructure evolves and changes over time, the product of a thriving community, as diverse social networks, representing common interests, needs or age groups, are made and interact. ‘Formal’ social infrastructure is frequently confused with facilities and is too often determined by negotiation between developers and planners. However they are interdependent and must both be facilitated to ensure inclusivity and equality of opportunity.

Assessment:

Informal social infrastructure in existing communities is best identified from within, through local knowledge. Social infrastructure planning must then take account of it:

- A Social Infrastructure Survey to be conducted by or with local partners and accessing the range of social groups, including those considered hard to reach
- A Social Infrastructure Needs Assessment (as proposed in Policy S1 A) to be undertaken in the light of these informal networks and of identified local need, to ensure that proposals for new infrastructure are carefully aligned with it

Application:

Social infrastructure can only support local diversity and inclusivity if taken into account at the earliest opportunity, not left to be negotiated between developers and planners

- Neighbourhood Plans to view the Social Infrastructure Survey as a fundamental component of local consultation and planning; its inclusion should be a requirement

- Each borough to provide a Social Infrastructure Needs Assessment (as proposed at S1 A) within their Development Plan and Local Plan, clearly informed by local Social Infrastructure Surveys
- As with Social Needs, this requirement could be inserted at Policy D2, by dividing item ‘A’ into two parts. New ‘A’ to be an evaluation of socio-economic and well-being factors, heritage/ character and social infrastructure (currently points 1, 7 and 11); and new ‘B’ an evaluation of the data relating to physical and environmental factors (the remaining points)
- Supplementary Planning Guidance (SPG) on Social Infrastructure is being updated. The Social Infrastructure Needs Assessment to be a key component, so that it is referenced in all strategic and major development proposals. In turn these must specifically address local requirements and demonstrate how the infrastructure is to be delivered

[Policy D6: B 3
Policy S1: A, B, G; 5.1.1, 5.1.2, 5.1.3, 5.1.4, 5.1.5, 5.1.8, 5.1.9
Policy HC7: 7.7.1, 7.7.2]

User:	Footwork Architects Limited

- Strengthen local planning protection for smaller industrial, cultural workspaces and pubs

User:	Highgate Society

HC7.B – Support and comment

The presumption on loss of pubs should read that reasons for refusal should not comprise those where it can be proven that they have "heritage, cultural, economic and social value." Indeed, all will have one or more of these attributes. Some boroughs, such as Islington, have stringent requirements in terms of proving inability to let, which should be adopted as a London wide policy.

HC7.C

Development that compromises the operation or viability of a pub "is not to be approved," (not the weaker, "should be resisted"). The Highgate Society has experience of proposals aimed at securing closure of a pub to achieve more valuable "luxury" housing by reducing their size until they become unviable

User:	London Borough of Ealing

The Council supports this policy and the principle of a common approach to the management of pubs in London.

This policy provides the tools necessary to manage development proposals for pubs which have a wider public value for local communities.

User:	Friary Park Preservation Group

Policy HC7

Protecting Public Houses as community assets is important

User:	Historic England

We strongly support policy HC7 and the good references to the heritage of public houses. The text in para 7.7.3 would benefit from a minor change to note that it is not just architecture, but interior fittings and layout, that are often important to the interest and significance of the building.

Amend the second sentence of para 7.7.3 to read: ‘This is often derived from their architecture, **their interior fittings**, their long-standing use ...’

User: Thames Valley Housing Association

Policy HC7 states:

A. Boroughs should:
1) protect public houses where they have a heritage, economic, social or cultural value to local communities, and where they contribute to wider policy objectives for town centres, night-time economy areas and Creative Enterprise Zones
2) support proposals for new public houses to stimulate town centre regeneration, cultural quarters, the night-time economy and mixed-use development, where appropriate.

B. Applications that propose the loss of public houses with heritage, cultural, economic or social value should be refused unless there is authoritative marketing evidence that demonstrates that there is no realistic prospect of the building being used as a pub in the foreseeable future;
C. Development proposals for redevelopment of associated accommodation, facilities or development within the curtilage of the public house that would compromise the operation or viability of the public house use should be resisted.

The supporting text to this policy is set out as an appendix to this letter and will be referred to where relevant throughout theses representations.
In summary it is considered that the proposed policy wording for Policy HC7 is too much of a blanket policy taking a ‘one size fits all’ approach which is not suitable for the overall aspirations of the policy, is not considered realistic and does not bear any resemblance to possible development opportunities and the wider aspirations of the Draft New London Plan.

TVHA considers that this draft new policy HC7 is poorly worded and not fully considered. TVHA supports the Mayor’s general aspiration to protect public houses, but this protection needs to be where relevant and suitable. The Policy makes no allowance for public houses which have closed down and have no prospect of re-opening. Taking each part of the policy in turn TVHA comment as follows:

Part A, 1 of the Policy HC7, makes a sweeping assessment that any pub which might have a historic, economic, social or cultural value to the local community should be protected.

This wording is well intentioned but does not take into consideration other possible situations where-in a public house may have had or has some or all of these attributes but is failing due to a number of possible circumstances.

Of relevance is the reason why a public house has closed or is closing, typically it is due to the trading performance of the pub and therefore it is commercial viability. As such an understanding is required of the pub's history, has it had multiple owners, has it ceased trading, why can an operator not be found etc.? This is frequently due to the fact that the pub is not profitable, which often means it is not well used by its local catchment or does not have an offer for the community in which it is located.

Rather than insist on the retention of a failing public house, it may be possible to replace it with another use or uses; or a development which offers equal or better value to the local and wider community and economy.

This might be for example be a development including affordable housing whether it be a fully affordable housing development scheme, or a development that offers at least 50% affordable housing and therefore meets one of the Mayors major housing aspirations, not to mention the provision of additional housing.

Part A, 2 of the Policy HC7, this section of the policy supports new pubs where relevant. TVHA have no objection to this aspiration.

Part B of the Policy HC7, this is closely tied in to Part A, 1. The policy seeks marketing evidence to support the loss of a public house which is understandable and accepted by TVHA. The policy does not specify the type of marketing or duration of any such marketing however the supporting text does suggest a period of 24 months marketing.

It is considered that the policy itself needs to be prescriptive in this matter to give clarity and certainty to ensure that marketing is measurable. TVHA would suggest that any marketing should be carried out in suitable and relevant mediums such as on-line, on-site, and through market leading businesses and should be for a minimum of 6 months but not for 24 months as suggested.

A two year marketing period is counter productive to the site and can have serious adverse impacts on a site and a community and prevents more immediate benefits and uplifts. It is considered that most significant interest of any marketing campaign is always in the first 4-6 weeks when a property hits the market, something still on the market after 6 months will have gained all the necessary exposure. Within 24 months a new development could have obtained planning permission and have been constructed. As such a period of 24 month fails to address the immediate issues that the London Plan is seeking to address in terms of a general housing shortage and more importantly an affordable housing shortage, but will also fail to support a local community and could in fact limit its requirements and opportunities.

TVHA also consider that this part of the policy fails to look at any possible situation which may exist other than where a pub is still trading. As such this needs to consider if a pub has already closed down.

The benefits of what could replace a public house also need to be addressed, and are not in the current wording of this part of the policy. For example, this could include situations such a proposal for a redevelopment of a pub which has already closed with 50-100% affordable housing in its place, or a development proposal which may seek to replace an oversized and outdated public house with a smaller local community use (which could be a smaller public house, or similar, or other uses such as a local shop).

The wider benefits need to be assessed and considered fully as the loss of the public house (which may have already stopped serving a local community) could be replaced by other public benefits.

With regards to Part C of the Policy HC7, this too fails to consider wider situations other than those in which a pub is still open and trading. Furthermore the policy also fails to consider a situation in that a redevelopment may offer back to the community a better facility, whether it be a replacement facility in the same use class (or different use class) and or other wider benefits, such as new housing or more importantly affordable housing.

In terms of policy HC7, TVHA understand the reasoning behind the suggested policy HC7, but consider that the policy needs to be reassessed and reworded to allow a more flexible approach should there be development opportunities which can offer better or other community benefits, such as affordable housing, and this policy needs to be relaxed to allow for various situations including those in which a pub has ceased trading with no prospect of resumption.

User: Redrow Homes London Division.

Policy HC7 refers throughout to pubs, which is one type of Class A4 drinking establishments.

Several of the tests set out in paragraph 7.76 fail to recognise that circumstances change. References to ‘heritage, economic, social or cultural value’
closely resemble the criteria for listing buildings.

As acknowledged in the London Plan, pubs benefit from a degree of protection under the General Permitted Development Order and many will also be subject to additional planning constraints through designation as a heritage asset. The reference to heritage, economic, social or cultural value’ should be revisited.

The ‘Principle of Selection for Listed Building’ (2010) confirms that there are two criteria for the to the statutory list: ‘Architectural Interest’ and ‘Historic
Interest’. The latter is defined as follows: ‘To be of special historic interest a building must illustrate important aspects of the nation’s social, economic, cultural, or
military history and/or have close historical associations with nationally important people. There should normally be some quality of interest in the physical fabric of the building itself to justify the statutory protection afforded by listing’.

The draft London Plan implies there is a tier of value that might fall short of listing but which should be protected. This risks misleading Londoners and what is actually achievable through the planning system. The London Plan must recognise the limits of planning policy.

Very little protection can be applied to activities taking place within a pub if it operates within the Class A4 or A3/A4 mixed
use permitted by the GPDO.

For example, under paragraph 7.7.6 a pub might currently be associated with a ‘sports club or team’ but there will surely be very few if any instances in which a change in management approach that sees this association lost would require planning permission. The inclusion of this statement in the draft London
Plan can only be counter-productive as operators may come to believe that any association with a sports club or team effectively devalues their pub as an asset.

User: Sean Creighton

LNPC is particularly concerned about the decrease in social infrastructure with its detrimental effect. In the last four years, for example, in Norbury, we have lost the Semley Rd dance studio in favour of housing, without a replacement. The Council failed to protect it from development.

Across Croydon campaigns have failed to persuade the Council to protect pubs supported by their local communities. In the Croydon Local Plan the Council now sets out policies to try and protect them which is welcome, but only time will tell in relation to new applications and the result of any appeals against planning permission. The ACV route is now being explored, and one pub has now been given ACV status. The London Plan should have a more robust set of provisions to ensure protection.

User:	Residents of the Corney Reach Estate, Chiswick

A community comes together through a common interest, in this case where they live. It stays together through strong social relationships/links which are achieved by sharing experiences, often at an event but usually over a drink or a meal. A local social meeting place is therefore a requirement, without it, the area will become sterile and social isolation ensue. The London Plan should promote and protect facilities that provide the opportunity for neighbours/communities to meet/socialise over a drink and whilst the offering of pubs is changing, should not be too prescriptive.

User:	Residents of the Corney Reach Estate, Chiswick

It should also be recognised that there are many different types of drinking establishments or continental style cafes which are in fact a hybrid of class A3 and A4 of the Town and Country Planning Use Classes Order 1987 .The proposed protection in HC7 should not be limited to public houses but it should also encompass all premises which operate as a class A4 drinking establishment use or class A3/A4 mixed use or where there is a substantial ancillary A4 element to overall use or indeed, where the premises themselves are the main meeting place for the area which might be lacking in places to socialise. Also, whilst the reference to Assets of Community Value is understood, the text should make it clear that ACV is only one form of providing protection and that the London Plan policies sit alongside the ACV protections and is not dependent on it.

User:	Oneill Homer
HC7 Neighbourhood plans can identify and qualify pubs that play an important role in local community life for either protection as they stand, or to devise proposals for appropriate enabling development and land use change to secure a long term viable use of the premises.	

User:	Public Health England

? Policy HC7 clause A (2) sets out how boroughs should “support proposals for new public houses to stimulate regeneration, cultural quarters, the night-time economy and mixed-use development, where appropriate.” We suggest that clause A (2) of this policy is deleted as it does not add to the protection of public houses and potentially could exacerbate issues created by significant concentrations of licensed premises.

User:	Highams Park Planning Group

POLICY PCF3: Public Houses:

The Plan recognises and supports the Local Plan policies which offer protection to pubs. Should proposals come forward for development of any of the sites listed below, they should:

i. Demonstrate that they have complied with the Local Plan policies regarding social infrastructure uses.
ii. Retain a significant element of A4 use

The pubs in the Highams Park Plan Area to which this policy applies are:

o The County Arms, 420 Hale End Road
o The Larkshall, 205 Larkshall Road
o The Royal Oak, 320 Hale End Road

User: London Borough of Camden

Camden strongly welcomes the Mayor's approach to protecting pubs. We agree that they provide multiple benefits, in particular strengthening of social ties and reducing isolation. We also welcome that the policy acknowledges the threat to the continuing viability of pubs from the loss of particular elements, such as meeting rooms and beer gardens, which can be vital for their success. Policy HC7 is very closely aligned with Policy C4 of Camden's recently adopted Local Plan. We, therefore share the Mayor's objectives for the safeguarding of pubs and consider the need for a robust planning approach to be essential.

The Plan should, however, make it clear that the new London Plan policy does not supersede existing detailed borough policies on pubs where these are based on local circumstances and up to date evidence and are consistent with the objectives of the London Plan; rather that the policies should operate together in a mutually supporting and complementary way. Without this, the adoption of the London Plan will leading to a reduction in the ability of boroughs to implement more detailed or locally specific policies that contribute towards delivering the policy objectives of the Mayor.

Criterion B. The loss of historic pubs is a cause for concern. The strengthening of policy preventing the loss of pubs on heritage grounds is welcomed and will give greater weight to council decisions.

Paragraph 7.7.8 – the word "or" in the final sentence appears to inadvertently weaken the otherwise strong protection provided by the policy. Where the loss of part of a public house is proposed, the acceptability of the proposal should be determined taking into account the impact on viability and the pub's community role. This assessment should not be removed simply because noise mitigation measures are provided, which the text currently implies. The following amendment to the text is suggested: "Boroughs are encouraged to **~~resist such proposals~~** **assess the impact** of such proposals **or and** ensure developers put in place measures…residents".

User:	UCL Urban Laboratory

HC7 Protecting public houses
This is a vitally important policy for the LGBTQI+ community. It must be recognised and prioritised that public houses are uniquely significant to many LGBTQI+ communities in terms of historic/heritage value as civic institutions and past and present use as sites of community and culture. All long-standing pubs (especially those that predate 1986) have significant ‘heritage, cultural, economic or social value’ to the LGBTQI+ community, and the wider public in London.
HC7C
Participants in our consultation were supportive of this policy specifically, as the closure or threat of closure for redevelopment of pubs with performance spaces has had a huge negative impact on the LGBTQI+ community in the last 10 years.

User:	Association of Directors of Public Health

We recommend strengthening HC7 A2) to**: support considered proposals for new public houses to stimulate town centre regeneration, cultural quarters, the night-time economy and mixed-use development where appropriate.**

And adding: **Proposals for new public houses should be considered on their own merit, and approval should be contingent on an assessment of the cumulative impact of licenced properties.**

Policy S1 Developing London's social infrastructure

User:	Revo

We recognize the importance of social infrastructure in developing strong and inclusive communities and enhancing quality of life. We support policies to ensure that new developments have their social infrastructure needs met, and that they are facilitated by easily accessible transport links, but must be carefully considered in regards major developments. It also requires an understanding of what and how services are provided, and by whom, to meet the needs of both the existing and new community and the impact on the existing community.

User: Tamara Burnell

As a resident of one of the estates already earmarked for “regeneration” against the residents’ wishes, I was horrified when I saw that the Draft New London Plan now includes even more aggressive regeneration targets for individual boroughs.

The estate where I live (Benhill Estate, Sutton Central) is a wonderful local community based around mid-rise (6 storey builds) flats and maisonettes built c. 1970, with a children’s and elderly residents’ garden in the centre. Importantly the existing estate is mostly home to families, who require 3 bed flats (if they have children of both genders or elderly parents to look after). It is fairly high density (I believe 330 families in one small square) but the estate is well designed, and although there are some repairs required to keep the flats in good condition, the estate is very well looked after and residents love their homes. The residents are deeply opposed to the plans to regenerate the estate which were announced last year, when the previous London Plan required Sutton to submit plans to redevelop existing estates and build higher rise blocks in much closer density/without green space, in order to accommodate twice the number of families. However, the previous plan discussed with residents included a promise that families that needed a 3 bed flat (either leaseholders or council tenants) would be able to get a replacement 3 bed flat if those previous regeneration proposals were to go ahead.

Now we see that the New plan requires Sutton to build almost 3 times as many new homes, primarily in one-bed flats. This completely fails to meet the needs of existing residents, most of whom are families. The borough has a very high number of families with young children, who already struggle to find accommodation. Forcing these families out of the borough (though who knows where they could go – Bolton?) will be hugely disruptive to their children's education. If all regeneration is to take the form of 1 bed flats, it will mean a very different demographic using local facilities (which in itself is problematic, as putting adult shops and nightclubs/bars right next to schools/health centres already creates quite a bit of tension), and nowhere for local families to entertain children and socialise. Child related services and shops are already a significant local employer, so if families with children are forced to leave the area because there is nowhere for them to live, local employment would suffer. Forcing high rise blocks into areas that were not designed to accommodate them is also problematic - a number of high rise blocks of flats have recently been erected in Sutton town centre and have created a terrible wind tunnel effect, due to poor planning – there are parts of the high street area that are now not safe on foot with children because of the high winds. Please don't make this worse. Finally, I assume that the plans to build only 1 bed flats would make Sutton a cheap dormitory town for single workers commuting into central London to do minimum wage jobs – however, Sutton's transport network is already completely failing to cope with the existing commuter burden (one or two Thameslink trains per hour, almost always half cancelled and always bursting and unsafe with the high number of passengers trying to cram themselves in), so more single people needing to commute into London would completely overwhelm the train services. You can't just increase housing density without considering the knock on impact on local services. Already most local services are squeezed beyond bursting point, so where would all these new residents find healthcare etc.??

The residents of the Benhill estate have raised their concerns with Sutton Council, but it appears that there is nothing the local council can do by itself, and so we are asking you, as London Mayor's office, to reconsider the housing targets for Sutton, and in particular the emphasis on 1 bed flats to meet those targets for numbers of new homes. Those of us with children need 3 bed homes, and that is not an unreasonable requirement.

User: London NHS Clinical Commissioning Group

Policy S1 Developing London's social infrastructure

We broadly support Policy S1 and S2 which together support NHS service and estate transformation plans in London and enable the release of surplus land and buildings for housing. In particular, part B of Policy S2 requires development proposals to support the provision of new and enhanced facilities which meet an identified need and new models of care. This should help avoid, for example, the provision of small GP surgeries that do not accord to the aim of providing primary care 'at scale'. In this regard, helpful supporting text is included in paragraphs 5.2.2 to 5.2.5.

We support clause F of Policy S1 which allows the loss of social infrastructure where there are realistic proposals for re-provision, or where the lost is part of a wider public service transformation plan. However, clause G, coupled with paragraphs 5.1.4 and 5.1.5 could be seen to override the flexibilities in clause F and paragraph 5.1.6 when applied. Clauses D and F would support the loss and disposal of 'redundant' (surplus) health land and premises as part of a service re-configuration or estate rationalisation plan, but the requirement in clause G to seek other social infrastructure uses before alternative uses, such as housing, could stifle these plans and hinder the provision of new housing on NHS land. As such we suggest that clauses D and F and Policy S2 need to take precedence over clause G.

Consequently, we suggest that clause G is amended to read:

"Where proposals do not meet clause F, redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered".

It would also be helpful to reword clause F so that it becomes permissive rather than restrictive, as follows: "Development proposals that would result in a loss of social infrastructure in an area of defined need should be permitted unless":

We suggest that additional supporting text in needed to reflect that social infrastructure providers are working with Boroughs to undertake a strategic approach to assets, using initiatives such as the One Public Estate programme.

User:	Kingston and Surbiton Constituency Labour Party

These are useful policies but we query whether RBK is able to deliver all of them in the context of central government cuts.

User: Notting Hill Housing Trust

NHHT welcome boroughs providing updated and detailed assessments of social infrastructure needs through their area based on the borough ten year housing targets as evidenced through the London –wide Strategic Housing Market Assessment.

NHHT acknowledges and supports the increase in housing completion targets and would emphasise that the demand and subsequent delivery of social infrastructure needs to be accounted for in up to date borough Regulation 123 Lists or within site allocation development plan documents. NHH would emphasise that only in exception circumstances should unallocated sites be required to provide on-site social infrastructure or pay additional financial contributions towards social infrastructure if they are providing a minimum of 35% on site affordable housing.

The supporting text to Policy S1 Developing London's social infrastructure suggests that boroughs should prevent the loss of social infrastructure facilities and in doing so should consider the designation of a facility as an "Asset of Community Value" if put forward by the local community. NHHT supports designations of this type on the basis that consultation with the property owner and liaison with borough planning policy teams are co-ordinated to ensure that any emerging or proposed redevelopment of the area is taken into consideration. As well as transparency on the criteria used to inform the designation the right of appeal and compensation for property owners should also be made available.

User:	British Property Federation

We are encouraged that the mayor recognises how social infrastructure is essential in developing strong and inclusive communities, desirability of place and a good quality of life. We are therefore supportive of the policy to ensure that new developments have their social infrastructure needs met, and that they are facilitated by easily accessible transport links. However, and as stated above, the provision of social infrastructure, particularly in relation to major developments, is a complicated process. It requires an understanding of how services are provided and by whom, a knowledge of the likely needs of the new community and the impact on the existing community. Therefore, a great deal of collaborative working is required between local authorities and the local community to ensure that the right blend of social infrastructure services is available to development in the right locations and at the right time.

User:	Brethren's Gospel Trusts

COMMENT –We welcome and support the requirement for Boroughs to undertake a needs assessment of social infrastructure to meet the needs of the diverse communities. However, this must recognise the different geographies of various faith communities, whether local or dispersed. This recognition will require ‘joined-up thinking’ for the Boroughs, where strategic as well as local social infrastructure is needed. It must be recognised that faith and community groups often provide the social capital which is crucial in achieving truly sustainable communities. Co-location of different forms of social infrastructure and the rationalisation or sharing of facilities should not become a rigid dogma in plan-making. The Secretary of State has previously recognised that the planning system has no authority to dictate the most appropriate forms of congregational worship. We acknowledge the need to retain redundant social infrastructure for alternative similar uses before alternative developments are considered, but a flexible approach will be required to enable best use of such assets within London.

User:	Brethren's Gospel Trusts
SUPPORT – We strongly support the explicit inclusion of faith within the definition of social infrastructure.	

User:	Brethren's Gospel Trusts

COMMENT – The longevity revolution and the ageing population should be recognised due to their special needs for social integration within strong and inclusive communities. This may result in innovative new forms of social infrastructure as well as housing.

User:	Brethren's Gospel Trusts

SUPPORT – We strongly support the recognition of the complexities of planning for social infrastructure in London and the need for a collaborative approach. NPPF paragraph 171 urges local planning authorities to understand and take account of the needs of the local population for facilities which underpin health and wellbeing, including places of worship. We therefore welcome similar sentiments in the New London Plan.

User:	Brethren's Gospel Trusts

COMMENT – We recognise the potential effects on a community through the loss of social infrastructure. However, the Brethren communities in London have widely relocated into other areas making a number of halls redundant. In several cases these have been purchased by other faith organisations and continue in a valuable community use. In other cases new uses for such site have been found including at least one instance of redevelopment to meet local educational needs. A flexible approach must be maintained. ACV designation is recognised in a recent Tribunal decision to be wholly inappropriate for redundant faith premises.

General Conference of the New Church v Bristol City Council (Localism Act 2011) [2015] UKFTT CR 2014 0013 (GRC) – see Appendix 2

User:	Brethren's Gospel Trusts

SUPPORT – We recognise the need to retain redundant social infrastructure for alternative similar uses before alternative developments are considered, but a flexible approach will be required to enable best use of such assets within London.

User:	Brethren's Gospel Trusts

SUPPORT – For the above reasons, we welcome this paragraph to reflect the positive and flexible approach to the retention or redundancy of social infrastructure.

User:	Brethren's Gospel Trusts

COMMENT – Whilst we recognise the need for greater efficiencies in land use shared use and co-location of facilities is not a universal panacea and must not become a rigid dogma. This has been promoted for a wide range of social infrastructure but it is widely recognised that for faith organisations this may not be appropriate. As set out above, the prospect of sharing premises with other faith groups is often neither practical nor consistent with their theological beliefs – see ‘Faith Groups and the Planning System’: AHRC Faith and Place network: October 2015 (paragraph 6).

User:	Brethren's Gospel Trusts

COMMENT – We recognise that this is very true and has resulted in some ongoing conflict and enforcement activities in some of the Boroughs where unauthorised uses have occurred. Several other faith groups have been long searching for premises to suit their needs competing with employment and other land uses which may command a higher land value of a perceived sustainability advantage. Again a flexible approach is required particularly where an existing place of worship is no longer required by its original occupants and other traditions or faiths and/or wider community functions may be accommodated.

User: Town and Country Planning Association

Policy S1 Developing London's Social Infrastructure

3.3.1 The TCPA welcomes the draft Plan's support for the delivery of high quality, inclusive social infrastructure that addresses local or strategic need. The TCPA considers that models of long-term stewardship of social infrastructure and community assets can provide an invaluable opportunity to meaningfully engage local people in the development process while providing long-term financial means for the maintenance of such facilities. The TCPA has done a considerable amount of work on the opportunities to secure models of long-term stewardship through the development process[1]. The absence of this consideration in the draft Plan is a huge missed opportunity to secure 'good growth' for all, in the long-term.

3.3.2 The TCPA recommends that Policy S1 is strengthened with the inclusion of reference to opportunities around innovative models of long-term stewardship of social infrastructure and community assets.

[1] For example, please see: https://www.tcpa.org.uk/built-today-treasured-tomorrow2014

User: Claire Mellish

5 Social Infrastructure (S policies) 201 / 219

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

Whilst Policy S1 recognises this important role, it does not evidence and base policy on the escalating loss of social infrastructure, particularly community space, in recent years as a result of development pressure.

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

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

Just Space produced and shared with the Mayor a manifesto for community spaces, and it is disappointing that these proposals have not been taken into account. These include:

- Recognise the irreplaceability and uniqueness of many community spaces and look after them for future generations as part of a continuing legacy
- Access to and the value of community spaces is not based on business plans and income generation but on the social value of the community space and its contribution to health and well being, inclusion, integration, empowerment and poverty reduction
- Social infrastructure and community spaces are essential to the achievement of lifetime neighbourhoods in which services and amenities are accessible and affordable to everyone, now and for future generations, and provide space for social co-operation and mutual aid,
- Valuing and resourcing community-centred knowledge and creativity for the contribution this can make to policy discussions and a whole system approach to community engagement across the GLA.

- The tool of Social Impact Assessment to gather evidence of community assets, including social infrastructure, with a methodology that ensures local community networks are fully involved through a collaborative relationship with the Boroughs and GLA. See Just Space Towards a Community Led Plan for London, chapter on Social Impact Assessments.

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

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

User:	London Wildlife Trust

We welcome and support Policy S1, with the specific reference in para 5.1.1 to the role of green infrastructure as a key component of social infrastructure, and indeed can be the primary focus for it, such as nature reserves, allotments or community gardens.

User: Moorfields Eye Hospital NHS Foundation Trust & UCT Institute of Opthalmology

Policy S1 Developing London's social infrastructure sets out that *"Development proposals that seek to make best use of land, including the public-sector estate, should be encouraged and supported. This includes the co-location of different forms of social infrastructure and the rationalisation or sharing of facilities."*

The policy goes onto stipulate that: *"Development proposals that would result in a loss of social infrastructure in an area of defined need should be refused unless:*
1) there are realistic proposals for re-provision that continue to serve the needs of the neighbourhood, or;
2) the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities in order to meet future population needs or to sustain and
improve services.

This policy is strongly supported. In relation to the City Road island site, the best use of the site is to subsidise the creation of a new, integrated research hospital. The creation of this new facility on public sector land represents an important rationalisation of these two estates for the benefit of Londoners.

Furthermore, there will be no loss of the services that Moorfields and IoO provide. It is envisaged that there will be a decant from the City Road island site to the preferred St Pancras site with continuity of service throughout. Also, given the regional and national catchment of the facility and the excellent public transport, the relocation to the neighbouring borough will have a minimal impact on patient access.

We welcome the recognition of the North Central Strategic Transformation Plan (STP) through this policy and note that the STP is completely in alignment with these proposals.

User: Benhill Residents

Our greatest concern about this policy is the availability or lack of availability of funding to support the needs for new social infrastructure. At present in many areas of large scale development there is a play off between the need for ‘affordable’ housing and that for social infrastructure when both are needed to facilitate the development of sustainable communities and Lifetime Neighbourhoods. Insufficient funding leaves a question around whether the London Plan will deliver sustainable development.

We propose the following alterations:
• ‘Financially accessible to all section of communities’ should be added to section C after – ‘Development proposals that provide high quality’.
• ‘Including that managed by voluntary or community sector groups’ should be added after ‘social infrastructure’ in S1G.

User: King’s College Hospital NHS Foundation Trust

Support of Social Infrastructure Policies

KCH are supportive of the social infrastructure policies outlined in Chapter 5 of the Draft London Plan. In particular, the following two policies are beneficial to not just KCH, but to the general long term development opportunities of healthcare in London:

- Draft Policy S1 – Developing London’s social infrastructure
- Draft Policy S2 – Health and social care facilities

London is home to some of the world’s most renowned health care facilities and it is imperative for regional policies to support their long term development potential to ensure London remains competitive in this field. It is in our view that draft policies S1 and S2 will support the delivery of high quality health care needs to Londoners and visitors alike.

User: Elaine Chambers

Policy S1 Developing London's Social Infrastructure

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User: Earls Court Public Sector Tenants' Assoc

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- '**Including that managed by voluntary or community sector groups'** should be added after 'social infrastructure' in S1G.

User:	Living Streets
We support “E. New facilities should be easily accessible by public transport, cycling and walking”.	

User:	New Policy Institute

Add to A:
following the guidance provided by the Mayor in his Supplementary Planning Guidance on social infrastructure

It is noted in 5.1.1. that ‘social infrastructure ‘can contribute towards a good quality of life’ and ‘play and important role in developing strong and inclusive communities’. Although boroughs are required in Policy S1 Developing London’s social infrastructure to undertake a needs assessment there are no guidelines which they should follow. This gap should be remedied.

User:	New Policy Institute

Add to para 5.1.2:
The Mayor will research and publish Supplementary Planning Guidance to help boroughs and others that sets out minimum criteria for social infrastructure to meet the needs of London’s diverse communities.

User: Silvertown Homes

We support the encouragement of shared use and co-location of social infrastructure facilities. The alignment of service provision has significant benefits including using land more efficiently, facilitating opportunities for different groups of people to come together, encourages inclusion, joined up
working and reduced the need to travel. However, the planning system needs to be better equipped at facilitating the different organisations / bodies (e.g. CCG and NHS bodies), timescales and the various funding streams. These can often be barriers to delivery of co-located facilities

Whilst it is appreciated that where a social infrastructure premises may be deemed redundant, other forms of social infrastructure should be considered first, further guidance should be provided here. What form of consideration should be given? Is marketing evidence sufficient? On what terms are they offered? How long is a suitable period? Can meanwhile uses be used in the interim? We have no objection in social infrastructure being prioritised if there is a need / demand – but clarity is required here.

It is noted where housing is considered to be an appropriate alternative use, opportunities for affordable housing provision should be maximised. This is an inappropriate supporting paragraph and should be removed. All sites should seek to maximise their ability to deliver affordable housing, subject to the relevant viability tests

User: Orbit

Orbit supports the general emphasis in the plan for providing social infrastructure and community facilities.

Orbit agrees that the policy measures social infrastructure provision by the actual facility, rather than by floorspace. The historic policy requirement to re-provide social infrastructure by floorspace had the potential to be onerous, particularly if the facility was large in terms of floorspace size, but underutilised/vacant.

Where a development proposal results in the need to relocate existing social infrastructure, Orbit supports the suggestion in the policy that it could be re-provided elsewhere in the neighbourhood. The flexibility of not having to re-provide the facility within the application site boundary of the development proposal is welcomed, particularly if developments have to increase housing density. Furthermore, some social infrastructure facilities may not be in the optimum location within the neighbourhood to serve the community and it may be better for it to be relocated to somewhere else within the vicinity as part of wider development proposals.

User:	Camden Town Conservation Area Advisory Committee
We welcome effective and urgent measures to improve air quality	

User:	The Forestry Commission
We welcome: Links to GI and natural environment in Chapter 5 social infrastructure	

User: Natalya Palit

The Draft London Plan (Policy S1G) should put in place strict definitions of what ‘redundant’ social infrastructure is considered to be. Strong requirements should be put in place by the GLA setting out clear requirements for what is expected of developers to justify the loss of social infrastructure space. Within the development industry there are anecdotally malpractices around adequate ‘marketing’ of such premises, where those employed to do so would benefit less financially from successfully marketing such uses for social infrastructure use, rather than if promoting for housing development. The Mayor should consider whether the London Plan can put further provisions in place to protect such spaces in the long term. In particular, I would suggest that the Mayor could take a firmer approach to the protection of social infrastructure and cultural assets by requiring authoritative marketing evidence similar to the requirements set out for the protection of pubs within paragraph 7.7.7.

User: London Borough of Newham

Policy S1 Developing London's social infrastructure

LBN are generally supportive of the policy which is complementary to Newham's Draft Revised Local Plan.

However, parts F and G of the policy are conflicting. It is unclear if policy S1(F) is entirely separate from S1(G) or if they should they be read as complementary. For example, if point 1 or 2 of S1(F) was met would an applicant be expected to meet S1(G) as well? Or if S1(F) is met does S1(G) become irrelevant? This confusion could be avoided through combining the 2 parts (F & G) into one cohesive point. This would allow for the release of social infrastructure facilities where appropriate to be managed to best effect while ensuring that the needs of other providers are taken into consideration.

In paragraph 5.1.3, there needs to be an acknowledgement that social infrastructure planning is an iterative process that needs to account for the designed capacity of sites, which often exceeds that anticipated in capacity/needs assessments ahead of more detailed work.

User:	London Borough of Sutton

SUPPORT. The London Borough of Sutton supports Policy S1 - Developing London’s social infrastructure as it aligns with the council’s policies for social infrastructure, education, health and well-being in its recently adopted Local Plan. The council’s policies aim to ensure local needs are met, through the identification of sites for health and education uses, protection of existing social infrastructure, and support for co-location of services.

User: CFGN Community Food Growers Network

The Community Food Growers Network supports the following comments drafted by the Reclaim Our Spaces coalition, in reference to:

#1 Helps produce a shift in thinking so that access to and the value of community spaces is not based on business plans and income generation but on the social value of the community space and its contribution to health and wellbeing, inclusion, integration, empowerment and poverty reduction.

#2 Recognises the irreplaceability and uniqueness of many community spaces and looking after them for future generations is part of a continuing legacy.

#3 Values and resources community-centred knowledge and creativity for the contribution this can make to policy discussions and a whole system approach to community engagement across the GLA

#4 Recognises that community spaces are not just physical buildings, but social spaces where cultural expression takes place. These social spaces provide movement and interaction between different cultures and it is important they are integrated as well as truly accessible to all.

#5 Recognises that community spaces are essential to the achievement of lifetime neighbourhoods in which housing, health and education facilities, shops and other local amenities are affordable and accessible to everyone, now and for future generations, and there is support for community networks based on social co-operation and mutual aid.

#6 Recognises that housing estates provide a wide range of community spaces – community halls, open spaces, playgrounds and other facilities – which must be protected

User:	North London Waste Authority

- The Authority suggests that paragraph 5.1.8 which includes reference to shared use and co-location of facilities could also include a reference to the provision of reuse operations such as a 'library of things' or a furniture reuse and repair hub such as a Groundwork Loop project (which NLWA supported in Hackney through a North London Community Fund grant). These can help ensure households have access to goods they may not be able to afford to purchase themselves or purchase new. These spaces also provide opportunities for social development via volunteering and training activities (retail and repair) for example.
- These types of operation provide volunteer, job creation and training opportunities providing anti-poverty and social cohesion benefits too. For example, five estate based reuse projects run by Groundwork London provided volunteering and employment for over 100 volunteers after 17 months of operation and created over £640,000 in social value through new community connections and skills gained. (Source: Repurpose: implementation guide available at: https://www.groundwork.org.uk/Sites/repurpose/Pages/repurposeresources

User: The Ubele Initiative

Space does not only need to be welcoming, diverse and accessible, but there also need to be a real diversity of communities securing and managing London's newer spaces including workspaces. This should interrupt the system which has developed over the past few years which is of white privileged middle class younger and older men with social and economic connections coming to typify the management of new space across most boroughs in London.

The Reclaim our Space Manifesto, 2016 was signed by over 40 community based organisation across London. It makes a series of important demands about the need for community spaces which is of relevance to **Policy Proposal GG1** but is also submitted by us for the purpose of this consultation exercise for consideration under **Policy S1: Developing London's Social Infrastructure.**

#1 Help produce a shift in thinking so that access to and the value of community spaces is not based on business plans and income generation but on the social value of the community space and its contribution to health and wellbeing, inclusion, integration, empowerment and poverty reduction.

#2 Recognising the irreplaceability and uniqueness of many community spaces and looking after them for future generations is part of a continuing legacy.

#3 Valuing and resourcing community-centred knowledge and creativity for the contribution this can make to policy discussions and a whole system approach to community engagement across the GLA.

#4 Community spaces are not just physical buildings, but social spaces where cultural expression takes place. These social spaces provide movement and interaction between different cultures and it is important they are integrated as well as truly accessible to all.

#5 Community spaces are essential to the achievement of lifetime neighbourhoods in which housing, health and education facilities, shops and other local amenities are affordable and accessible to everyone, now and for future generations, and there is support for community networks based on social co-operation and mutual aid.

#6 Housing estates provide a wide range of community spaces – community halls, open spaces, playgrounds and other facilities – which must be protected and their use encouraged.

We would like GG1 policy statement and the S1 to be revised to recognise the main sentiments include our manifesto. We would also like to see mention of the **need for local authorities to undertake a Social Impact Assessment alongside other statutory assessment processes** and to collaborate with organisations such as Just Space and academic institutions such as UCL Bartlett School of Planning to conduct these important assessments.

User: Footwork Architects Limited

Principle 2

Social infrastructure, both formal and informal, must be assessed and its value understood so that it can be protected where it exists, or provided for within new development plans and proposals

Description:

‘Informal' social infrastructure evolves and changes over time, the product of a thriving community, as diverse social networks, representing common interests, needs or age groups, are made and interact. ‘Formal’ social infrastructure is frequently confused with facilities and is too often determined by negotiation between developers and planners. However they are interdependent and must both be facilitated to ensure inclusivity and equality of opportunity.

Assessment:

Informal social infrastructure in existing communities is best identified from within, through local knowledge. Social infrastructure planning must then take account of it:

- A Social Infrastructure Survey to be conducted by or with local partners and accessing the range of social groups, including those considered hard to reach
- A Social Infrastructure Needs Assessment (as proposed in Policy S1 A) to be undertaken in the light of these informal networks and of identified local need, to ensure that proposals for new infrastructure are carefully aligned with it

Application:

Social infrastructure can only support local diversity and inclusivity if taken into account at the earliest opportunity, not left to be negotiated between developers and planners

- Neighbourhood Plans to view the Social Infrastructure Survey as a fundamental component of local consultation and planning; its inclusion should be a requirement

- Each borough to provide a Social Infrastructure Needs Assessment (as proposed at S1 A) within their Development Plan and Local Plan, clearly informed by local Social Infrastructure Surveys
- As with Social Needs, this requirement could be inserted at Policy D2, by dividing item ‘A’ into two parts. New ‘A’ to be an evaluation of socio-economic and well-being factors, heritage/ character and social infrastructure (currently points 1, 7 and 11); and new ‘B’ an evaluation of the data relating to physical and environmental factors (the remaining points)
- Supplementary Planning Guidance (SPG) on Social Infrastructure is being updated. The Social Infrastructure Needs Assessment to be a key component, so that it is referenced in all strategic and major development proposals. In turn these must specifically address local requirements and demonstrate how the infrastructure is to be delivered

[Policy D6: B 3
Policy S1: A, B, G; 5.1.1, 5.1.2, 5.1.3, 5.1.4, 5.1.5, 5.1.8, 5.1.9
Policy HC7: 7.7.1, 7.7.2]

User: Dagenham Dock Limited

Draft Policy S1 – Developing London's social infrastructure

DDL welcomes the Mayor's objective to secure greater provision of social infrastructure across London; particularly Draft Policy S1C which offers support for development proposals which provide high quality, inclusive social infrastructure that addresses a local or strategic need – for example school provision. It is however crucial that the provision of such infrastructure, which often incurs significant costs to the developer either via the provision of land or S106 contribution, is recognised within the development proposal's financial viability appraisal and the impact that this is likely to have on scheme viability and affordable housing. At present the requirements and aspirations of Draft Policy S1 do not directly correlate with the threshold approaches proposed in Draft Policy H6 – please refer to specific text in relation to this policy below.

User: Highgate School

The School specifically acknowledges the support given in the Draft Plan for additional and enhanced social infrastructure which includes education, community, play youth, recreation and sports facility. The increased emphasis on ‘inclusive’ social infrastructure and need to provide access to high quality education are intrinsic educational priorities to the School. The School therefore supports the general principle of Policy S1 Development of London’s social infrastructure.

However, whilst the School supports the need for social infrastructure to be easily accessible we consider there needs to be greater flexibility when promoting the shared use and co-location of education facilities. In that respect, the School objects to the subsequent narrative to the policy. Paragraph 5.1.8 states that “shared and co-location of facilities should be encouraged, in order to align service provision, use land more efficiently and facilitate opportunities for different groups of people to come together, encouraging further inclusion and community participation… Examples of this include schools opening their facilities out of hours for use by the community…”

Whilst the School does already have arrangements with other schools it may not always be reasonable or practical to open the use of facilities to the wider community. The United Nations (UNICEF) Convention on the Rights of a Child requires, specifically, that the best interests of children must be the primary concern in making decisions that may affect them. The United Kingdom has fully accepted this Convention and already applies it within the planning system. The ‘protection of the child’ is therefore a legal principle which establishes that the safety, security and health protection of pupils as a legal responsibility of the School. Consequently, whilst the desire to encourage greater shared use of educational facilities is laudable, this needs to be fully assessed against the educational requirements of individual institutions, safety and security issues and the practicalities of wider use, before considering whether it may be appropriate for School facilities to be used by the community.

Recommendation

We consider that it may not always be appropriate for schools to more widely open their facilities and that policy should recognise the need for flexibility when requiring the wider or co-use of facilities. It is further considered that within the supporting text the legal principle of ‘protection of the child’ need to be specifically stated and recognised as the overall priority.

User: United Colleges Group (UCG)

Social Infrastructure and Co-Location
The Group also wishes to specifically identify support for Draft Policy S1 which allows for the co-location of social uses (including rationalisation and sharing of facilities) and the promotion of locally led regeneration through Opportunity Area Planning Frameworks, Area Action Plans, Neighbourhood Plans or master plans.

The co-location of social and community facilities is strongly supported. The Group does however support the co-location of social and community functions with other uses such as residential and commercial development and this should be made stronger. Whilst this approach is set out in supporting text at 5.2.8 it should be incorporated in to policy wording. Such an approach would enable the development of active communities and ensure that developments are busy and thriving places to live, work and learn at all hours of the day.

User:	London Borough of Ealing

The greater flexibility regarding loss of social infrastructure in circumstances where proposals are part of a wider public service transformation plan or to sustain and improve services is welcomed and reflects the difficult choices faced my many LPAs in balancing the budgets of public authorities.

User: United Colleges Group (UCG)

Policy consistency

In light of the above, Part G of Draft Policy S1 provides an opportunity for educational institutions, such as UCG, to explore opportunities to invest in development proposals by releasing redundant land for redevelopment as other forms of social infrastructure.

The co-location, consolidation and intensification of educational uses will present opportunities for institutional investment in other land uses of a higher priority, such as residential. UCG consider that this should be made clearer within the policy.

This will create a significant opportunity to provide homes for Londoners whilst also generating income to be invested in further improvements to learning facilities for community or social use. However, there is an inherent policy conflict with other elements of the Draft Plan (for example Draft Policy S3). In this regard, the plan should be carefully considered to ensure that opportunities for creative development planning solutions are not precluded by default.

User:	London Borough of Ealing
Clarity is sought. Why single out policies G3 and G4? Other green space types/designations might also constitute social infrastructure.	

User: Northwoods Voice Limited

Chapter 5 Social Infrastructure.

The growth of local schools in and adjacent to Northwood, both private and public, as we have seen with the general population increase in the Town, has put much perceived additional pressure on Town centre traffic systems, pollution, noise and consequentially probably, in our opinion, the safety of residents and school children.

The construction of any new development by TfL in the Green Lane Conservation Area will, in our opinion, be likely to worsen these aspects during the demolition and construction period (2 years or so ?) as well as afterwards. Comments by TfL's consultants in earlier TfL submissions show projected lengthening traffic queues despite the proposed introduction of shorter traffic light cycle times (itself a risk to pedestrians – including the young and old).

In short, packing yet more people into the Town Centre is going to tend, in our opinion, towards a break-down in social cohesion with increased crime likely to be a major concern. The policies within the Draft London Plan will encourage this adverse trend.

User:	Natural England

We welcome the recognition of green infrastructure as a part of Social infrastructure in Paragraph 5.1.1. As GI is capable of acting as the setting for many aspects of social infrastructure we **recommend** that Policy S1 includes a further point to read ‘H: *Green infrastructure should be considered a delivery vehicle to meet aspects of social infrastructure’.*

User:	Natural England
5.1.5: Alternative uses could include specific reference to green infrastructure use such as open space and community gardens.	

User: Historic England

Historic social infrastructure in London includes hospitals, schools, places of worship, libraries, fire stations, swimming pools and many other civic and institutional buildings. Many have been adapted or re-purposed for other community use. As key buildings, often designed to convey their purpose, they have particular resonance and are especially supportive of local identity and civic pride. Many are key landmark buildings too, demonstrating that community landmarks do not need to be tall to provide a valued focus for the local community.

Our report *'Risky business?'* highlights examples of successful adaptation and re-use of historic social infrastructure, for instance, the repair and extension of Poplar Baths (listed grade II), and the regeneration of Wilton's Music Hall (listed grade II*) for cultural and community use. Other examples include community re-use of London's fire stations, such as at Hornsey and West Norwood.

Historic England is pleased that the Plan promotes the re-use of social infrastructure where it is redundant for its original use (policy S1, part G). As London's population grows there may be beneficial effects for many un- or under-used historic buildings in line with policy HC1, part E.

Shared use can also be highly beneficial as outlined in the Plan in para 5.1.8, which we welcome. An excellent example is the dual use of St Mary Aldermary in the City where the church nave doubles as a weekday cafe, providing a magnificent social space in which to relax, meet friends and enjoy the Wren church.

Recommendations for change

See our comments on GG1 and the need to recognise the close and reinforcing relationship between heritage and community identity.

User: Friary Park Preservation Group

Policy S1

Developing London's social infrastructure

This policy is crucial but has not been and will not be observed. Almost every site that becomes available is given over to new housing. Social infrastructure in all its forms is not keeping pace and requires more than just free WiFi. There needs to be a needs assessment of social infrastructure to meet the needs of London’s diverse communities, the co-location of different forms of social infrastructure and the rationalisation or sharing of facilities.

User:	BEE Midtown

We believe that businesses have a responsibility to their local communities to invest to improve the area and stimulate further growth. We support the continued imposition of the Community Infrastructure Levy and the s.106 Levy and believe that they should be used to ensure that crucial infrastructure projects continue as planned.

User: National Health Services England, National Health Services Improvement, Community Health Partnerships.

The NHS is committed to making best use of its property assets to help improve the provision of healthcare services and facilities. Policies that encourage and enable the development of the NHS estate, either for more intensive healthcare facilities, a mix of uses including healthcare facilities, or alternative uses, such as residential, are welcome. Such policies will help the NHS to provide new and improved healthcare facilities and contribute towards London's equitable and sustainable growth, including through the delivery of new homes

Polices that allow for the loss of healthcare facilities, where this forms part of a wider NHS strategy, are also welcome. Historically the NHS has faced opposition from boroughs to the reconfiguration of healthcare facilities, and this has resulted in the NHS either being unable to dispose of surplus properties or facing costly delays during this process. The NHS needs to be able to dispose of surplus properties to meet healthcare needs, which often involves strategic reorganisation and alternative provision across administrative boundaries.

The Draft New London Plan proposes to make specific provision within the main text of its policies for the loss of healthcare facilities under the same circumstances in which the NHS would seek to dispose of them. The supporting text makes specific reference to the LEB, which will help to co-ordinate this disposal process in consultation with the and boroughs.

This proposed new approach goes further than the existing London Plan and the Social Infrastructure Supplementary Planning Guidance (2015), which is welcomed. However, assmall change is suggested to the text of Proposed Policy S1 to ensure that boroughs do not request long marketing periods before planning permission is granted for the change of use of social infrastructure where the criteria for their loss is met, as has frequently been the case in relation to surplus healthcare facilities in the past.

A minor clarification is suggested to ensure that Policy S1 is not misinterpreted to mean that the proposed flexibilities in relation to the loss of social infrastructure should be overridden by the separate proposed requirement for redundant social infrastructure to be considered for full or partial use as other forms of social infrastructure before alternative developments are considered.

Minor additions are also suggested to Policies S1 and S2 to ensure their strategic aims are met via specific recognition of the need for boroughs to support cross boundary re-provision through the planning process.

A further clarification should be added to ensure that the redevelopment of NHS properties is not prevented by inappropriately approved Asset of Community Value (ACV) designations.

Revisions to Policy S1

A. Boroughs, in their Development Plans, should undertake a needs assessment of social *infrastructure to meet the needs of London's diverse communities.*

B. In areas of major new development and regeneration, social infrastructure needs should be addressed via area-based planning such as Opportunity Area Planning Frameworks, Area Action Plans, Development Infrastructure Funding Studies, Neighbourhood Plans or master plans.

C. Development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported.

D. Development proposals that seek to make best use of land, including the public-sector estate, should be encouraged and supported. This includes the co-location of different forms of social infrastructure and the rationalisation or sharing of facilities.

E. New facilities should be easily accessible by public transport, cycling and walking.

F. Development proposals that would result in a loss of social infrastructure in an area of defined need should be refused unless:

1. there are realistic proposals for re-provision that continue to serve the needs of the neighbourhood and wider social geographies, or;

2. the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities in order to meet future population needs or to sustain and improve services across London.

G. In cases where the proposed loss of social infrastructure in an area of defined need meets the criteria in part F no marketing evidence should be required to demonstrate that it is no longer needed.

H. Redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered.

User:	Sustrans
Sustrans supports the identification of accessibility by public transport, cycling and walking in the planning and determination of social infrastructure development.	

User:	Sustrans
We strongly support the application of the Healthy Streets Approach in explaining access requirements for social infrastructure.	

User:	National Health Services England, National Health Services Improvement, Community Health Partnerships.

We suggest the following revised wording for Paragraph 5.1.4:

The loss of social infrastructure can have a detrimental effect on a community. Where possible, boroughs should protect such facilities and uses, and where a development proposal leads to the loss of a facility, require a replacement that continues to meet the needs of the neighbourhood it serves. To further protect against the loss of social infrastructure that is valued by a local community or group, boroughs should consider approving the designation of a facility as an
Asset of Community Value (ACV) if put forward by the local community. <u>However, boroughs should not approve such an application where it relates to a type of social infrastructure that would not meet the relevant legal criteria for designation or where the site forms part of a public sector land development programme which would facilitate wider community benefit.</u>

User:	National Health Services England, National Health Services Improvement, Community Health Partnerships.

We suggest the following revised wording for Paragraph 5.1.6:

It is recognised that there will be cases where social infrastructure providers are undertaking an agreed programme of social infrastructure re-provision orservice reconfiguration, such as has been seen within healthcare. Where social infrastructure premises are deemed redundant as part of this process, such losses may be acceptable in line with parts D and F of Policy S1 Developing London's social infrastructure and Policy S2 Health and social care facilities and any related information or guidance in order to achieve the overall aims of the programme and to continue to meet the needs of Londoners. In such cases, part H of Policy S1 Developing London's social should not be applied.

User: South West London and St George's Mental Health NHS Trust

The Trust supports the general aims of Part D of this draft policy which says that:

“Development proposals that seek to make best use of land, including the public-sector estate, should be encouraged and supported. This includes the co-location of different forms of social infrastructure and the rationalisation or sharing of facilities.”

The Trust also supports Part F2 of the draft policy which says that:
“Development proposals that would result in a loss of social infrastructure in an area of defined need should be refused unless…the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities in order to meet future population needs or to sustain and improve services.”

Part F is followed by Part G which reads as follows:
“Redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered.”

Paragraphs 5.1.6 and 5.1.7 of the supporting text read as follows:
“5.1.6 It is recognised that there will be cases where social infrastructure providers are undertaking an agreed programme of social infrastructure re-provision or service reconfiguration, such as has been seen within healthcare. Where social infrastructure premises are deemed redundant as part of this process, such losses may be acceptable in line with parts D and F of Policy S1 Developing London’s social infrastructure and Policy S2 Health and social care facilities and any related information or guidance in order to achieve the overall aims of the programme and to continue to meet the needs of Londoners.

“5.1.7 In all cases, where housing is considered to be an appropriate alternative use, opportunities for affordable housing provision should be maximised.”

Our Comments

Organisations such as the Trust are well-regulated outside of the planning regime, including significant oversight by parties such as CCGs, NHS England and NHS Improvement who take a ‘forward view’ on the needs of the population. NHS Trusts also undertake significant amounts of consultation with stakeholders in relation to any service changes that they propose. Such oversight and consultation ensures that, in relation to healthcare premises, service reconfiguration is undertaken on a sound basis that does not prejudice service delivery for the foreseeable future.

The flexibility that Part F2 would afford providers such as the Trust is welcomed and strongly supported; the ability to optimise the use of buildings and land is often an essential pre-requisite to the enhancement of services and the provision of new facilities, for example through the generation of a receipt and / or the more efficient use of land.

Similar provisions already exist in the current London Plan at paragraph 3.87A. It is our experience, however, that some local planning authorities are very reluctant to proceed on the basis of such provisions.

This has meant that much-needed investment in facilities of benefit to Londoners is delayed. In some cases, other funding streams that are needed to pay for new facilities (in addition to the receipt from the land) can be lost because of the passage of time or simply because deals can fall through as a result of delay.

Our concerns with the proposed policy – all of which can very easily be addressed – are that:

in relation to Part D, and unless it is specifically said so, local planning authorities are likely to require social infrastructure on land that is freed up by rationalisation or sharing of facilities. This will prove to be a disincentive to making the best use of the public estate and could have the unintended consequence of dissuading public organisations from considering rationalisation / sharing which then enables the release of land to be used for other priorities such as housing;

? in the absence of conjunctive words between the limbs of this policy, local planning authorities may apply Part G in addition to Part F. It should be made clear that Part F2 operates on its own even where there might be a need for community facilities, albeit provided that the absolute ‘loss’ of a community facility or land in community use is justified on the basis of an agreed programme of investment;

? reconfiguration should not be characterised as ‘re-provision’, at least not in the same form; there should not be an expectation that reconfiguration and modernisation will result in the same amount or type of floorspace;

? whilst the expectation that opportunities for affordable housing are maximised is a very important consideration generally, this should not be at the expense of investment in facilities that are necessary for the health and wellbeing of everyone in the community. Rather it should be clear that ensuring that London is properly catered for with sustainable healthcare facilities is also a very high priority and that this may need to be balanced against the general affordable housing targets. Almost needless to say, without essential healthcare facilities, London cannot sustainably accommodate the significant quantum of additional housing that the Mayor is seeking; and

? based on our experience, local planning authorities are reluctant to accept evidence that originates from outside of the planning regime, even if the planning regime is not the competent authority. It is our view the Mayor should prepare brief but clear guidance, in conjunction with stakeholders, as to the nature of information that will be needed to enable reconfiguration proposals to be assessed as according with draft Policy S1.

User: Mr Gary Hayes

Policy S1 Developing London’s Social Infrastructure

Our greatest concern about this policy is the availability or lack of availability of funding to support the needs for new social infrastructure. At present in many areas of large scale development there is a play off between the need for ‘affordable’ housing and that for social infrastructure when both are needed to facilitate the development of sustainable communities and Lifetime Neighbourhoods. Insufficient funding leaves a question around whether the London Plan will deliver sustainable development.

We propose the following alterations:

? ‘Financially accessible to all section of communities’ should be added to section C after – ‘Development proposals that provide high quality’.

? ‘Including that managed by voluntary or community sector groups’ should be added after ‘social infrastructure’ in S1G.

User: Redrow Homes London Division.

We support the encouragement of shared use and co-location of social infrastructure facilities. The alignment of service provision has significant benefits including using land more efficiently, facilitating opportunities for different groups of people to come together, encourages inclusion, joined up
working and reduced the need to travel. However, the planning system needs to be better equipped at facilitating the different organisations / bodies (e.g. CCG and NHS bodies), timescales and the various funding streams. These can often be barriers to delivery of co-located facilities.

Whilst it is appreciated that where a social infrastructure premises may be deemed redundant, other forms of social infrastructure should be considered first, further guidance should be provided here. What form of consideration should be given? Is marketing evidence sufficient? On what terms are they offered? How long is a suitable period? Can meanwhile uses be used in the interim? We have no objection in social infrastructure being prioritised if there is a need / demand – but
clarity is required here. It is noted where housing is considered to be an appropriate alternative use, opportunities for affordable housing provision
should be maximised. This is an inappropriate supporting paragraph and should be removed. All sites should seek to maximise their ability to deliver affordable housing, subject to the relevant viability tests.

User: Residents of the Corney Reach Estate, Chiswick

Re Draft Policy S1 Developing London's Social Infrastructure and also draft Policy HC7 Protecting Public Houses.

This representation is made on behalf of the residents of Corney Reach, Chiswick in relation to draft Policy S1 Developing London's Social Infrastructure and also draft Policy HC7 Protecting Public Houses.

The existing National Planning Policy Framework (NPPF) sets out at paragraphs 69 onwards, under the heading of "8. Promoting Heathy Communities", policies which properly recognise the importance of social cohesion in the promotion of health in communities and take a broad approach (exampled in paragraph 70) that planning decisions should plan positively for a range of uses including meeting places, cultural buildings, public houses, etc, with a view to enhancing the sustainability of communities and residential environments.

Similarly, paragraph 69 underlies the importance of opportunities for meetings between members of communities who otherwise do not come into contact with each other. S1 and HC7 together are too narrowly drawn and do not encompass the broad ambit envisaged in the NPPF and also the current London Plan in the section London's Living Spaces and Places where, for example, it emphasises at 7.4A the importance of social cohesion .

Social Cohesion is the links between people, the greater the number of links the greater the Social Capital. Knowing your neighbours socially in London is extremely important, as social isolation is commonplace. It creates and strengthens: social network; safety nets; sharing of duties and neighbourliness. The sense of community/belonging is a basic human need so making people happier resulting in making it easier for people to help each other and less likely to have arguments.

User:	Residents of the Corney Reach Estate, Chiswick

Policy S1 at paragraph 5.1.1 which purports to protect social infrastructure is much too narrow in its reference to what is included in social infrastructure and this should be brought in line with the above submission and brought more in line with the broad approach in the current London Plan.

User: Andrea Carey Fuller

Our greatest concern about this policy is the availability or lack of availability of funding to support the needs for new social infrastructure. At present in many areas of large scale development there is a play off between the need for ‘affordable’ housing and that for social infrastructure when both are needed to facilitate the development of sustainable communities and Lifetime Neighbourhoods. Insufficient funding leaves a question around whether the London Plan will deliver sustainable development.

We propose the following alterations:

- ‘**Financially accessible to all section of communities’** should be added to section C after – ‘Development proposals that provide high quality’.
- ‘**Including that managed by voluntary or community sector groups’** should be added after ‘social infrastructure’ in S1G.

User: Cross River Partnership

This Policy and the subsequent ones in specific areas (S2- S7) are generally to be supported and undoubtedly both Boroughs and other relevant organisations, including Business Improvement Districts (BIDs), will wish to follow them.

However, they present two problems, common with some other Policies in the Plan. Firstly, it is often not clear from where the necessary funding will come – and the Plan not really acknowledge this as an issue.

In addition, the implementation of these Policies in specific cases, e.g. the provision of public toilets, could involve the Mayor becoming excessively involved in detailed policymaking at a local level, rather than concentrating on overall strategic objectives. It would be helpful if the relevant Policies in this chapter were amended to reflect these two concerns.

Policy S1 could also be strengthened by giving greater recognition to the role played by new development in supporting social infrastructure via new employment and training, apprenticeships, social housing and investment in culture.

User:	YMCA

OPPORTUNITY TO COLLABORATE ON SOCIAL INFRASTRUCTURE

We believe in focusing on whole-life delivery of assets (eg. successful operations), experimenting with innovative hybrid models and targeting outcomes rather than outputs. Therefore, potential for a new institution to collaborate in managing, coordinating and measuring impact of social infrastructure

User: Support Oakfield Society

Policy S1 Developing London's social infrastructure

A Boroughs, in their Development Plans, *should [Replace 'should' with 'must'. Reason: the social dimension of sustainable development is so important that not to undertake a needs assessment would render a Local Plan unsafe.]* undertake a needs assessment of social infrastructure to meet the needs of London's diverse communities.

E New facilities should be easily accessible by public transport, cycling and *walking [Add additional sentence: 'Existing facilities which are easily accessible in these ways should be protected.']*.

User:	Support Oakfield Society

5.1.2 Social infrastructure plays an important role in developing strong and inclusive communities. It can provide opportunities to bring different groups of people together, contributing to social integration and the desirability of a place. *[Insert sentence: ‘Volunteers play a vital role in this process and the management of these activities. This should be taken into account and their participation levels valued and measured.’]*

User:	Support Oakfield Society

5.1.4: The loss of social infrastructure can have a detrimental effect on a community. Where possible, boroughs should protect such facilities and uses, and where a development proposal leads to the loss of a facility, require a replacement that continues to meet the needs of the neighbourhood it serves. To further protect against the loss of social infrastructure that is valued by a local community or group, boroughs should consider the designation of a facility as an Asset of Community Value (ACV) if put forward by the local community. *[Add: 'Once an Asset of Community Value is listed, its designation should be renewed unless the community no longer puts it forward as such.']*

User: L&Q

Planning for social infrastructure

It is essential that strategic development proposals benefit from informed advice from providers/operators of social infrastructure (e.g. advice from the NHS on primary health care facilities). This ensures that suitable provision can be accommodated in development proposals at the appropriate stage in the design development of strategic development schemes. We support the encouragement of shared use and co-location of social infrastructure facilities. The alignment of service provision has significant benefits including using land more efficiently, facilitating opportunities for different groups of people to come together, encourages inclusion, joined up working and reduced the need to travel. However, the planning system needs to be better equipped at facilitating the different organisations / bodies (e.g. CCG and NHS bodies), timescales and the various funding streams. These can often be barriers to delivery of co-located facilities.

The London Plan must emphasise the responsibilities of providers/operators of social infrastructure to provide guidance. Whilst it is appreciated that where a social infrastructure premises may be deemed redundant, other forms of social infrastructure should be considered first, further guidance should be provided here. What form of consideration should be given? Is marketing evidence sufficient? On what terms are they offered? How long is a suitable period? Can meanwhile uses be used in the interim? We have no objection in social infrastructure being prioritised if there is a need / demand – but clarity is required here. It is noted where housing is considered to be an appropriate alternative use, opportunities for affordable housing provision should be maximised. This is an inappropriate supporting paragraph and should be removed. All sites should seek to maximise their ability to deliver affordable housing, subject to the relevant viability tests.

User: Mr Liam Kelly

A ‘Social Infrastructure Accessibility Level’ matrix should be developed and adopted in the London Plan, setting out what services and amenities should be within (a) a walking distance from home, (b) a short bus or cycle ride from home, and (c) a train, tram or tube journey from home. Community and social infrastructure should be protected, gaps in existing provision should be addressed and sufficient should be provided in new developments (including financially accessible community spaces) to meet the additional need. Where existing uses are no longer appropriate, community organisations should be prioritised as potential new occupants.

New developments should not be able to take over or prevent free public passage/ right of way in adjacent proximity.

Policy 3.7.1 needs to be included in the shaded box to clarify the definition of publically accessible open space between buildings whether publically or privately owned, including the Thames and London’s waterways

Community Spaces must be a high priority in the London Plan. There should be sufficient infrastructure associated with every housing development, doctor’s surgeries, schools, children’s & youth facilities parks and green space to facilitate socialising, networking and community building.

User: Parkview International Ltd Group of Companies

Policy S1: Developing London's Social Infrastructure

We consider that:

- The draft plan's definition of "social infrastructure" is too wide – the types of social infrastructure identified all have differing locational and site specific requirements that do not de facto meet each other's social infrastructure needs.
- There is duplication of the policy relating to open air sports and leisure forms of social infrastructure with Chapter 8 Green infrastructure and the Natural Environment and also draft policy S5 – Sports and recreation facilities.
- Given funding restraints for most forms of social infrastructure, new or replacement social infrastructure can often only be provided if non-social infrastructure developments form part of a mixed use development.

We therefore recommend the following changes to draft Policy S1

Recommended Changers to Draft Policy S1

1. Development proposals that would result in a loss social infrastructure use in an area of defined need should be refused unless:

1. there are realistic proposals for re-provision of the same social infrastructure use that continue to service the needs of the neighbourhood, or
2. the loss of such existing social infrastructure use is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities in order to meet future population needs or to sustain and improve services.

1. Where an existing social infrastructure use becomes redundant, redevelopment proposals needs to assess whether the same or another social infrastructure use can be incorporated as part of a viable mixed use development.

Supporting Text

5.11

Social infrastructure covers a range of services and facilities that meet local and strategic needs and contribute towards a good quality of life.

Social infrastructure is defined as uses which fall within:

Health provision

Education provision

Community

Play, youth, recreation, sports, faith and emergency facilities

Each Social Infrastructure use has its own unique site specific requirements in terms of location, land area and bespoke building requirements so as to meet identified needs.

Outdoor recreation and sports facilities falls within the Plan's definition of Green infrastructure in all its forms which is a key component of social infrastructure, and is addressed separately in Chapter 8, Policy G3 Metropolitan Open Land and Policy G4 Local and green open space.

User: London Borough of Camden

Camden supports the objective of developing social infrastructure outlined in policy S1. The policy is generally consistent with Camden's approach and we are using section 106 and CIL to secure and expand provision of social facilities. However, as the Mayoral CIL will divert funds away from this form of infrastructure a balance needs to be struck between the level of that charge and impact on funding for social infrastructure at the local level. The viability evidence supporting both this policy and the Mayoral CIL needs to demonstrate that meaningful funding for affordable housing, transport and social infrastructure can be secured without deterring development.

Criterion F and paras. 5.1.5 and 5.1.6 - To ensure consistent application of the policy, the Plan should be clear whether, when the loss of a facility forms part of a public service transformation plan, other forms of social infrastructure should be sought.

The London Plan should highlight here how health and wellbeing is considered across the London Plan, including good quality affordable housing, opportunities for physical activity including active travel, access to healthy food, and opportunities for social interaction.

User:	London Borough of Camden

See also comment on policy GG2 F - Welcome shared use of infrastructure assets, although this may be problematic in practice. For example, our experience has been that as the NHS reimburses GP practice rent, but it will not reimburse rent for other health uses, such as community healthcare, commissioned by the CCG. With GP practices unable to take on the risk associated with a lease, this is a significant barrier to sensible co-location of services.

User: Barts Health NHS Trust

Draft Policy S1 – Developing London's social infrastructure

The Trust supports the general aims of Part D of this draft policy which says that:

"Development proposals that seek to make best use of land, including the public-sector estate, should be encouraged and supported. This includes the co-location of different forms of social infrastructure and the rationalisation or sharing of facilities."

The Trust also supports Part F2 of the draft policy (with the suggested underline amendment):

"Development proposals that would result in a loss of social infrastructure in an area of defined need should be refused unless…the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities, estate rationalisation or utilising existing assets in order to meet future population needs or to sustain and improve services."

Part F is followed by Part G which reads as follows:

"Redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered."

Paragraphs 5.1.6 and 5.1.7 of the supporting text read as follows:

"5.1.6 It is recognised that there will be cases where social infrastructure providers are undertaking an agreed programme of social infrastructure re-provision or **service reconfiguration**, such as has been seen within healthcare. Where social infrastructure premises are deemed redundant as part of this process, such losses may be acceptable in line with parts D and F of Policy S1 Developing London's social infrastructure and Policy S2 Health and social care facilities and any related information or guidance in order to achieve the overall aims of the programme and to continue to meet the needs of Londoners.

"5.1.7 In all cases, where housing is considered to be an appropriate alternative use, opportunities for **affordable housing provision** should be maximised."

Our Comments
Organisations such as the Trust are well-regulated outside of the planning regime and there is significant oversight by parties such as CCGs, NHS England and NHS Improvement who take a ‘forward view’ on the needs of the population. Trusts also undertake significant amounts of consultation with stakeholders in relation to any service changes that they propose. Such oversight and consultation ensures that, in relation to healthcare premises, service reconfiguration is undertaken on a sound basis that does not prejudice service delivery for the foreseeable future.

Despite such oversight the NHS expends significant sums of money – money that is much-needed for clinical services – in trying to persuade planning decision-makers that they are not best-placed to make decisions about the provision of healthcare facilities. For example not all buildings in NHS ownership can be reconfigured or adapted in a manner that meets modern requirements. It is essential that such assets can be disposed of at best value to facilitate the delivery of new healthcare facilities that meet prevailing standards and commissioners’ requirements.

The flexibility that Part F2 would afford providers such as the Trust is welcomed and strongly supported; the ability to optimise the use of buildings and land is often an essential pre-requisite to the enhancement of services and the provision of new facilities, for example through the generation of a receipt and / or the more efficient use of land.

Similar provisions already exist in the current London Plan at paragraph 3.87A. It is our experience, however, that some local planning authorities are very reluctant to proceed on the basis of such provisions. We have encountered the following issues when trying to negotiate schemes with local planning authorities:

? they want to rely solely on much more restrictive local plan policies which generally require a marketing exercise to be undertaken to demonstrate that there is no need for any type of social infrastructure before they will entertain an alternative (ie a non-social infrastructure) land use;

? in circumstances where such marketing yields responses, the authority will take a position that the use(s) for which marketing has demonstrated a demand should be preferred over the sale of the site for investment in an agreed programme of service reconfiguration – in effect creating a barrier to the replacement of unsatisfactory facilities with new fit-for-purpose buildings;

? they sometimes struggle to understand or to accept that new ways of working and different models of care can mean that there is often a requirement for much smaller amounts of purpose-built floorspace when compared with existing (often Victorian or early twentieth century) buildings. Instead, they seek to maintain the status quo or to achieve net gains. In this context, the use of the term ‘re-provision’ in a policy can be misleading and unhelpful;

? they may make the provision of a certain amount of affordable housing a pre-requisite for the ‘loss’ of social infrastructure, an added cost that can render unviable an agreed programme of social infrastructure re-provision or service reconfiguration;

? they will place little reliance on the decisions of their health scrutiny committees’ endorsements of service reconfiguration and even attach little weight to business plans and other similar documents even when they are approved by healthcare regulators and / or HM Treasury; and

? where new facilities of a strategic nature are proposed (for example providing a service that covers more than one borough) and the borough that hosts all or part of an existing facility is not the local planning authority where the new facility is proposed, the resistance to the ‘loss’ of the existing facility can be even greater.

The Trust is aware that these issues have been encountered by other trusts across London and the common consequence is that necessary investment in facilities of benefit to Londoners is delayed. In some cases, other funding streams that are needed to pay for new facilities (in addition to the receipt from the land) can be lost because of the passage of time or simply because deals can fall through as a result of delay.

Our concerns with this proposed policy – all of which can very easily be addressed – are that:

? in relation to Part D, and unless it is specifically said so, local planning authorities are likely to require social infrastructure on land that is freed up by rationalisation or sharing of facilities. This will prove to be a disincentive to making the best use of the public estate and could have the unintended consequence of dissuading public organisations from considering rationalisation / sharing which then enables the release of land to be used for other priorities such as housing;

? in the absence of conjunctive words between the limbs of this policy, local planning authorities may apply Part G in addition to Part F. It should be made clear that Part F2 operates on its own even where there might be a need for community facilities, albeit provided that the absolute ‘loss’ of a community facility or land in community use is justified on the basis of an agreed programme of investment; and should take precedence against competing or conflicting policies.

? reconfiguration should not be characterised as ‘re-provision’, at least not in the same form; there should not be an expectation that reconfiguration and modernisation will result in the same amount or type of floorspace;

? in today’s changing health service, the delivery of some services are tendered, in the event that the current NHS provider loses the contract, it is not unknown for the service to be moved to the premises of the new provider. The Trust would seek to rationalise its estate and reinvest the receipts in such circumstances;

? whilst the expectation that opportunities for affordable housing are maximised is a very important consideration generally, this should not be at the expense of investment in facilities that are necessary for the health and wellbeing of everyone in the community. Rather it should be clear that ensuring that London is properly catered for with sustainable healthcare facilities is also a very high priority and that this may need to be balanced against the general affordable housing targets. The delivery of housing is not always appropriate on hospital land taking into account the infrastructure, road, schools etc that also form part of the wider mix. Almost needless to say, without essential healthcare facilities, London cannot sustainably accommodate the significant quantum of additional housing that the Mayor is seeking; and

? based on our experience, local planning authorities are reluctant to accept evidence that originates from outside of the planning regime, even if the planning regime in not the competent authority. The Mayor should prepare brief but clear guidance, in conjunction with stakeholders, as to the nature of information that will be needed to enable reconfiguration proposals to be assessed as according with draft Policy S1.

User: Tavistock and Portman NHS Foundation Trust

Draft Policy S1 – Developing London's Social Infrastructure

The Trust supports the general aims of Part D of this draft policy which says that:

"*Development proposals that seek to make best use of land, including the public-sector estate, should be encouraged and supported. This includes the co-location of different forms of social infrastructure and the rationalisation or sharing of facilities."*

The Trust also supports Part F2 of the draft policy which says that:
"*Development proposals that would result in a loss of social infrastructure in an area of defined need should be refused unless…the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities in order to meet future population needs or to sustain and improve services.*"

Part F is followed by Part G which reads as follows:

"Redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered."

Paragraphs 5.1.6 and 5.1.7 of the supporting text read as follows:

"5.1.6 It is recognised that there will be cases where social infrastructure providers are undertaking an agreed programme of social infrastructure re-provision or service reconfiguration, such as has been seen within healthcare. Where social infrastructure premises are deemed redundant as part of this process, such losses may be acceptable in line with parts D and F of Policy S1 Developing London's social infrastructure and Policy S2 Health and social care facilities and any related information or guidance in order to achieve the overall aims of the programme and to continue to meet the needs of Londoners.

"5.1.7 In all cases, where housing is considered to be an appropriate alternative use, opportunities for ***affordable housing provision*** *should be maximised."*

Our Comments

Organisations such as the Trust are well-regulated outside of the planning regime and there is significant oversight by parties such as Clinical Commissioning Groups (‘CCGs’), NHS England and NHS Improvement who take a ‘forward view’ in regard to changes in population and the socio-economic and epidemiological needs of the population. Trusts also undertake significant amounts of consultation including statutory consultation with stakeholders in relation to any service changes that they propose. Such regulation, oversight and consultation ensures that, in relation to healthcare premises, service reconfiguration is undertaken on a sound basis that does not prejudice service delivery for the foreseeable future.

The flexibility that Part F2 would afford providers such as the Trust is welcomed and strongly supported; the ability to optimise the use of buildings and land is often an essential pre-requisite to enhance service provision and delivery with the provision of new facilities, for example through the generation of a receipt and / or the more efficient use of land.

Similar provisions already exist in the current London Plan at paragraph 3.87A. It is our experience, however, that some local planning authorities are very reluctant to proceed on the basis of such provisions. We have encountered the following issues when trying to negotiate schemes with local planning authorities:

? they want to rely solely on much more restrictive local plan policies which generally require a marketing exercise to be undertaken to demonstrate that there is no need for any type of social infrastructure before they will entertain an alternative (i.e. a non-social infrastructure) land use;

? in circumstances where such marketing yields responses, the authority will take a position that the use(s) for which marketing has demonstrated a demand should be preferred over the sale of the site for investment in an agreed programme of service reconfiguration – in effect creating a barrier to the replacement of unsatisfactory facilities with new fit-for-purpose buildings;

? they sometimes struggle to understand or to accept that new ways of working and different models of care can mean that there is often a requirement for much smaller amounts of purpose-built floorspace when compared with existing (often Victorian or early twentieth century) buildings. Instead, they seek to maintain the status quo or to achieve net gains. In this context, the use of the term ‘re-provision’ in a policy can be misleading and unhelpful;

? they may make the provision of a certain amount of affordable housing a pre-requisite for the ‘loss’ of social infrastructure, an added cost that can render unviable an agreed programme of social infrastructure re-provision or service reconfiguration;

? they will place little reliance on the decisions of their health scrutiny committees’ endorsements of service reconfiguration and even attach little weight to business plans and other similar documents even when they are approved by healthcare regulators and / or HM Treasury; and

? where new facilities of a strategic nature are proposed (for example providing a service that covers more than one borough) and the borough that hosts all or part of an existing facility is not the local planning authority where the new facility is proposed, the resistance to the ‘loss’ of the existing facility can be even greater.

We have encountered all of these situations in a number of London boroughs and the common consequence is that necessary investment in facilities of benefit to Londoners is delayed. In some cases, other funding streams that are needed to pay for new facilities (in addition to the receipt from the land) can be lost because of the passage of time or simply because deals can fall through as a result of delay.

Our concerns with this proposed policy – all of which can very easily be addressed – are that:

? in relation to Part D, and unless it is specifically said so, local planning authorities are likely to require social infrastructure on land that is freed up by rationalisation or sharing of facilities. This will prove to be a disincentive to making the best use of the public estate and could have the unintended consequence of dissuading public organisations from considering rationalisation / sharing which then enables the release of land to be used for other priorities such as housing;

? in the absence of conjunctive words between the limbs of this policy, local planning authorities may apply Part G in addition to Part F. It should be made clear that Part F2 operates on its own even where there might be a need for community facilities, albeit provided that the absolute ‘loss of a community facility or land in community use is justified on the basis of an agreed programme of investment;

? reconfiguration should not be characterised as ‘re-provision’, at least not in the same form; there should not be an expectation that reconfiguration and modernisation will result in the same amount or type of floorspace;

? whilst the expectation that opportunities for affordable housing are maximised is a very important consideration generally, this should not be at the expense of investment in facilities that are necessary for the health and wellbeing of everyone in the community. Rather it should be clear that ensuring that London is properly catered for with sustainable healthcare facilities is also a very high priority and that this may need to be balanced against the general affordable housing targets. Almost needless to say, without essential healthcare facilities, London cannot sustainably accommodate the significant quantum of additional housing that Mayor is seeking; and

? based on our experience, local planning authorities can be reluctant to accept evidence that originates from outside of the planning regime, even if the planning regime in not the competent authority. The Mayor should prepare brief but clear guidance, in conjunction with stakeholders, as to the nature of information that will be needed to enable reconfiguration proposals to be assessed as according with draft Policy S1.

User: Age UK London - a charity working with older Londoners

POLICY S1: DEVELOPING LONDON'S SOCIAL INFRASTRUCTURE
PROPOSED POLICY AMENDMENT:

Policy S1:
A Boroughs, in their Development Plans AND SUPPLEMENTARY GUIDANCE, ~~should~~ MUST undertake AND MAINTAIN AN ONGOING needs assessment of social infrastructure to meet the needs of London's diverse communities, INCLUDING PEOPLE OF ALL AGES AND THOSE WITH DEMENTIA AND THE GROUPS THAT SUPPORT THEM. THE NEEDS ASSESSMENT SHALL BE SUBJECT TO ONGOING COMMUNITY ENGAGEMENT, INCLUDING LOCAL PEOPLE AND VOLUNTARY ORGANISATIONS.

B In areas of major new development and regeneration, social infrastructure needs should be addressed via area-based planning such as Opportunity Area Planning Frameworks, Area Action Plans, Development Infrastructure Funding Studies, Neighbourhood Plans or master plans AND AGE FRIENDLY AUDITS

E New SOCIAL INFRASTRUCTURE facilities should be SAFELY AND easily accessible by public transport, cycling and Walking AND SHOULD BE DESIGNED AS HUB SCHEMES, PROVIDING A RANGE OF INTEGRATED FACILITIES, AS REFERRED TO UNDER POLICY SD6(A)(1).

F. WHERE POSSIBLE SOCIAL INFRASTRUCTURE FLOOR SPACE SHOULD BE DESIGNED AND MANAGED FOR FLEXIBLE USE, WITH A RANGE OF COMMUNITY USES AT DIFFERENT TIMES, ACCORDING TO THE NEEDS OF THE LOCAL COMMUNITY.

~~F~~ G. Development proposals that would result in a loss of social infrastructure
in an area of defined need should be refused unless:

~~G~~ H. Redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered, WHICH SHOULD OCCUR IN CONSULTATION WITH LOCAL VOLUNTARY ORGANISATIONS.

User: Age UK London - a charity working with older Londoners

36. S1A LINK TO POLICY CHANGE We believe this policy intends to improve and increase London's Social Infrastructure. We consider that the proposed amendments strengthen the intention of the policy by the inclusion of SPG and by expanding the description of London's diverse communities. The replacement of SHOULD by MUST gives
ongoing community engagement is essential if local plans are to be effective in achieving the aims of the Plan.

37. S1B The inclusion of the words 'Age Friendly Audits' will assist the Mayor to achieve the aims and intentions of GG1.

38. S1E Professor Anthea Tinker and Professor Jay Ginn recommend that L.As recognise the importance of community centres, libraries, and the services of the voluntary sector. Professor Tinker's report recommends hub schemes in every borough where a range of impartial information and advice be available on the whole variety of issues of importance to older people. This is considered to be an essential facility to enable older people to achieve the advice they need to maintain their lives as citizens (Professor Anthea Tinker and Professor Jay Ginn, 'How Far has London Come as an Age Friendly City?).

39. S1F This amendment adds a further strand to enhance the intention of the policy and keep in line with other principles of flexible use of developments.

40. S1F now becomes S1G.

41. S1G becomes S1H to which should be added the condition to consult with local voluntary organisations in order to consistently ensure that stakeholder participation helps to contribute to locally effective solutions.

User: ReSpace Projects

We’re pleased to see the ambition of the draft London Plan, and have been impressed by the commitment of the GLA teams. City Hall clearly understands the need to better engage with community groups; Building long-term relationships facilitates more open dialogue about complex and sometimes sensitive issues, which tends to result in more constructive consultation.

Whilst we appreciate that the scale of the plan in the current context presents competing priorities, the need to recognise the value of community spaces cannot be over-emphasised: London is at a critical point in history.

The loss of community legacy, such as libraries, heritage buildings, parks and pubs, due to the prominence of financial rather than social capital, will be condemned by future generations. Worse still, is the potential damage to social cohesion, public health and the economy, that occurs when people no longer have space to meet, learn, play, eat and create.

The respace system of ‘holistic regeneration’ is a temporary solution to wider issues such as recycling, food waste and access to affordable space. It is a collaboration between local authorities, landlords, developers, community groups and businesses, which offers a practical, street-level and low cost method to begin the process of developing a circular economy.

We support the response from our colleagues, Just Space. Specifically, the following principles will be essential to help develop the functional, healthy and low impact city to which we and the draft London Plan both aspire. We therefore passionately advise that the following principles are included in Policy S1 A – F.

- *Recognise the irreplaceability and uniqueness of many community spaces and look after them for future generations as part of a continuing legacy*
- *Access to and the value of community spaces is not based on business plans and income generation but on the social value of the community space and its contribution to health and well-being, inclusion, integration, empowerment and poverty reduction*
- *Social infrastructure and community spaces are essential to the achievement of lifetime neighbourhoods in which services and amenities are accessible and affordable to everyone, now and for future generations, and provide space for social co-operation and mutual aid*

- *Valuing and resourcing community-centred knowledge and creativity for the contribution this can make to policy discussions and a whole system approach to community engagement across the GLA.*

- *The tool of Social Impact Assessment to gather evidence of community assets, including social infrastructure, with a methodology that ensures local community networks are fully involved through a collaborative relationship with the Boroughs and GLA. See Just Space Towards a Community Led Plan for London, chapter on Social Impact Assessments.*

ReSpace Projects ‘asks’ to the Mayor:

- We would like the Mayor to support and promote an addition to planning legislation, which would enable the more flexible use of empty spaces on a meanwhile basis. This would effectively cut ‘red tape’ which often constricts such initiatives as the Hive Dalston. It would legitimise a system that received cross-party support at the ReSpace Mayoral Hustings in 2016. Labour representative, Tom Copley has been long-term supporter of our projects.

- We would like to see the above principles included in Policy S1 A – F

- Identify and support developers and businesses who contribute to the community and share resources, reducing waste through initiatives such as ours.

User:	Karl Brown

5.1.4 The loss of social infrastructure, where replacement is required, then this replacement should be local to and of equivalent worth to the affected community. The plan would usefully make sure a stipulation specific.

User:	Women's Resource Centre

• Many women’s centres and women’s organisations have been lost over recent decades. We need to re-provide safe, accessible and affordable physical spaces where women can meet, organise, learn, train, network and seek advice, care and help.

• Women are still the major care-givers, and the provision of free / affordable crèches and childcare in such centres is essential

• The GLA owns many assets surplus to operational requirements, including those previously owned by TfL, NHS etc. We would ask that the Mayor works with the women and girls sector to identify a suitable site for a London Women’s Centre to be built, housing WRC and other organisations.

• Secular ‘Open’ spaces are particularly needed for women, outside of religious structures as these can sometimes be also the source of oppression.

• Offices and women-only start-up provision. There are far more women trying to set up their own businesses and safe and affordable spaces are needed with crèche provision.

• Violence against women and girls is still a key issue; two women a week are killed in the UK by their male partners / ex-partners and we need the provision of more safe and protected and high quality refuges.

User: Ms Siobhan Mooney

#1 Help produce a shift in thinking so that access to and the value of community spaces is not based on business plans and income generation but on the social value of the community space and its contribution to health and wellbeing, inclusion, integration, empowerment and poverty reduction.

#2 Recognising the irreplaceability and uniqueness of many community spaces and looking after them for future generations is part of a continuing legacy.

#3 Valuing and resourcing community-centred knowledge and creativity for the contribution this can make to policy discussions and a whole system approach to community engagement across the GLA.

#4 Community spaces are not just physical buildings, but social spaces where cultural expression takes place. These social spaces provide movement and interaction between different cultures and it is important they are integrated as well as truly accessible to all.
#5 Community spaces are essential to the achievement of lifetime neighbourhoods in which housing, health and education facilities, shops and other local amenities are affordable and accessible to everyone, now and for future generations, and there is support for community networks based on social co-operation and mutual aid.

#6 Housing estates provide a wide range of community spaces – community halls, open spaces, playgrounds and other facilities – which must be protected and their use encouraged.

User: Mama Ujuaje

Recommended wording:

A. Boroughs, in their Development Plans, in consultation with the relevant community sectors, should undertake a needs assessment of social infrastructure to meet the needs of London's diverse communities to express themselves and freely associate.

B. In areas of major new development and regeneration, if social infrastructure needs should be addressed via area-based planning such as Opportunity Area Planning Frameworks, Area Action Plans, Development Infrastructure Funding Studies, Neighbourhood Plans or master plans, it means that the
considerations of the community, the human beings and the human environmental relationships are being considered only secondarily. This means that it is necessary to rephrase this policy to read:

B (New) Where, at community scale or across communities working together they determine there to be, within a locality, a development challenge to be met, regional authorities should work to support appropriate responses and area action planning which are coherent with proposals for larger neighbourhood planning which, in itself, is responsive to participatory planning, sound environmental and social impact assessment and the logic of a sound planning procedure.

C. Development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported.

The wording of this policy makes it seem that it is the infrastructure alone that determines quality and inclusion, but in fact that role is held by the human policy making environment behind infrastructural development. There are a number of pressing challenges on city development at present, not least of which is the city's environmental and social 'footprint' with regard to pollution and energy/carbon use and management. Development proposals need to prove that they have sufficiently considered their wholesale impact which will shape how human needs are both configured and met.

D. Development proposals that seek to make best use of land, including the public-sector estate, should be encouraged and supported. This includes the co-location of different forms of social infrastructure and the rationalisation or sharing of facilities. Community Food Hubs are a good example of where town centre planning and sound community consultation come together to develop viable, community centred, environmentally sound uses of the land consistent with the ability to meet new and emerging social needs and understandings and which ensures that co-location and efficient land use does not fall foul of participatory impact assessments. Such land space rationalisation should reflect the need to support the development of viable, community centred, environmentally sound uses of the land consistent with the ability to meet new and emerging social needs and understandings and which ensures that co-location and efficient land use does not fall foul of participatory impact assessments.

E. New facilities should be easily accessible by public transport, cycling and walking as well as be step free and accessible and welcoming to all potential users.

F. Development proposals that would result in a loss of social infrastructure in an area of defined need should be refused unless:

1. there are realistic proposals for re-provision that continue to serve the needs of the neighbourhood, as assessed by community representatives of the respective neighbourhood, or;

2. the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities in order to meet future population needs or to sustain and improve services as defined by a coherent integrated impact assessment.

Fit for purpose needs elaborating here in order to ensure it is responsive to social and environmental (integrated) assessment.

G. Redundant social infrastructure, as adjudged by a process in which all potential users are involved, should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered.

5.1.1 Social infrastructure covers a range of services and facilities that meet local and strategic needs and contribute towards a good quality of life. It includes health provision, education, community, play, youth, recreation, sports, faith, and emergency facilities. Green infrastructure in all its forms is also a key component of social infrastructure, and is to be addressed supportively in Chapter 8, Policy G3 Metropolitan Open Land and Policy G4 Local green and open space because of the overlaps and coherence between the policies and processes that make up the basis of how land space can be supportive of community/human productive use of social infrastructure in ways which promote diverse access and use. An integrated Impact assessment must help to make consistent and link related policies in their use and impact across sectors.

Perhaps it needs to be addressed in the light of, rather than separately from, issues to do with Metropolitan Open Land, Local green and open space as examples of green infrastructure because of the overlaps and coherence between the policies and processes that make up the basis of how land space can be supportive of community/human productive use of social infrastructure in ways which promote diverse access and use.

5.1.2 Social infrastructure plays an important role in developing strong and inclusive communities. It can provide opportunities to bring different groups of people together, contributing to social integration and the desirability of a place.

5.1.3 Planning for social infrastructure in London is complex. There are a wide range of providers and stakeholders and the degree of clarity around future provision and funding varies. It is therefore important that boroughs work collaboratively with service providers and other stakeholders, including the local community, to fully understand existing and future social infrastructure needs and plan appropriately for these, including through the Community Infrastructure Levy. Supplementary Planning Guidance will provide details of how this could be approached. Social Infrastructure is still structure, not process and may not adequately capture the history of a locations use and how, over time, particular spaces, relationships between spaces or an absence of a provision have impacted the effective, efficient or productive community use of facilities or amenities. As a result the Integrated Impact assessment needs a thorough local community overview, if it is to sufficiently capture these elements.

5.1.4 The loss of social infrastructure can have a detrimental effect on a community. Where possible, boroughs should protect such facilities and uses, and where a development proposal leads to the loss of a facility, require a replacement that continues to meet the needs of the neighbourhood it serves. To further protect against the loss of social infrastructure that is valued by a local community or group, boroughs should consider approving the designation of a facility as an Asset of Community Value (ACV) if put forward by the local community.

5.1.5 In cases where social infrastructure premises may be deemed redundant and a replacement facility is no longer necessary or appropriate, other forms of social infrastructure should be considered for the site or part of the site to help to meet other community needs, before alternative uses are pursued.

5.1.6 It is recognised that there will be cases where social infrastructure providers are undertaking an agreed programme of social infrastructure re-provision or service reconfiguration, such as has been seen within healthcare. Where social infrastructure premises are deemed redundant as part of this process, such losses may be acceptable in line with parts D and F of Policy S1 Developing London's social infrastructure and Policy S2
Health and social care facilities and any related information or guidance in order to achieve the overall aims of the programme and to continue to meet the needs of Londoners.

5.1.7 In all cases, where housing is considered to be an appropriate alternative use, opportunities for genuine homes should be optimised as connected to the provisions to be made for social infrastructure. Therefore a home as a place which supports inclusive and diverse communities, if it is to be provided, then there needs to be concomitant guarantee that all new or improved housing is associated with improvements in or expansion of the social infrastructural requirements and amenities which will enable communities to grow in a healthy manner and to promote well-being for all. This is what we refer to when speaking of a Lifetime Neighbourhood.

Housing, elsewhere referred to as homes, are not disconnected from the provisions to be made for social infrastructure. Therefore, if housing which supports inclusive and diverse communities is to be provided then there needs to be concomitant guarantee that all new or improved housing is associated with improvements in or expansion of the social infrastructural requirements which will enable communities to grow in a healthy manner and to promote well-being.

5.1.8 Social infrastructure should be easily accessible by walking, cycling and public transport in accordance with the Healthy Streets Approach. It is also important to consider the way that social infrastructure integrates with other facilities and the way people who live or work in the area might want to access it. Shared use and co-location of facilities should be encouraged, in order to align service provision, use land more efficiently and facilitate opportunities for different groups of people to come together, encouraging further inclusion and community participation. Shared use and co-location will also help facilities and service providers to work in a more coherent and joined-up way, and share maintenance and management costs. It could also potentially reduce the need to travel thereby improving accessibility. Examples of this include schools opening their facilities out of hours for use by the community, the co-location of health and sports facilities, or the co-location of facilities with housing to ensure effective usage. A further element of co-location to be considered is that associated with ensuring people have access to fresh and locally grown, where possible, foodstuffs and a means to develop light industry around a food system which meets local needs for all groups. This means that all economic development aspects which link to well-being, good mental health promotion, the provision of green spaces for children and young people all can be interwoven in the idea of co-location. This produces a lifetime neighbourhood.

5.1.9 Voluntary and community groups often find it difficult to find premises suitable for their needs. Unused or underused facilities should be brought into use, where possible, to help address these needs. The additional use or reuse of places of worship should be considered for providing accommodation for other traditions or faiths and/or wider community functions.

User: London Assembly Labour Group

Policy S1 Developing London’s social infrastructure

Suggested changes

The Policy needs to explore possibility of having a policy for Hindu Cremation facilities along the principles of Policies S7 – B and C.
Justification for policy recommendations

Policy S1 in para 5.1.1 mentions and range of services and facilities to meet local ad strategic needs. It refers to ‘faith’ as one of the facilities and Policy S7 deals with Burial space requirements to meet faith specific requirements.
I note that there is no mention of cremation facilities. There is a big debate and aspiration for a culturally specific Hindu Crematorium facility in North-West London.

Policy S2 Health and social care facilities

User:	Taxpayers Against Poverty Ltd

"**You cannot improve the health of the poorest Londoners.** Their incomes are subjected to the punitive national regime of the present government so the impact of low incomes on their mental and physical health, life expectancy, infant deaths, low birthweight , hunger, homelessness and rough sleeping is out of your control. Please see Land grabbing, income inequality and state-sanctioned debt by Paul Nicolson.and TAP health equality campaign of 9 Blogs about low income, debt, hunger, mental and physical health by Dr Angela Donkin, Professors Kate Pickett and Richard Wilkinson, Carl Walker and Madeleine Power."

User: Montagu Evans

Draft Policy S2 – Health and Social Care Facilities

The Trust supports this policy and in particular its recognition that development proposals that support the provision of high-quality new and enhanced facilities to meet identified need and new models of care should be supported.

The Trust also supports paragraph 5.2.9 of the supporting text which states that:

"Development and regeneration proposals for an area provide an opportunity to ***re-think how land and buildings are used*** *and whether there is a more optimal configuration or use of that land. Hospital reconfigurations are an example where more intensive and better use of a site can lead to a combination of improved facilities and the creation and release of surplus land for other priorities. The London Estates Board aims to improve the way surplus and underused NHS assets are identified and released, and provide a single forum for estate discussions in London, ensuring early involvement of London Government partners. Membership includes NHS partners, local Government, the GLA and national partners (central Government, NHS England, One Public Estate and the national NHS property companies)."*

However, the Trust wishes to highlight that it is often the case that 'surplus' or 'underused' land must be used to support necessary healthcare estate renewal programmes. As such, it is often the case that other policy demands such as affordable housing need to be balanced with the necessity of ensuring that essential services for Londoners have a sustainable future.

User: London Borough of Hammersmith and Fulham

Policy S2 (C)

“New facilities should be easily accessible by public transport, cycling and walking.”

The design of building in areas of poor air quality can minimise the exposure of future vulnerable users of health facilities to poor air quality.

Recommended text for point (C)

New facilities should be easily accessible by public transport, cycling and walking. *To Help prevent or mitigate the impacts of noise and poor air quality on these health and social care facilities any habitable rooms and external amenity areas are orientated away from the main sources of poor air quality and noise e.g. busy roads*

Underline represents additional text that is recommended to be added.

User: London Forum of Amenity and Civic Societies

Policy S2 Health and social care facilities

London Forum **strongly supports** the much more proactive approach to secure **local** needs and the emphasis on them being easily accessible – however, in the wrong order – it should be by walking, cycling and public transport as in paragraph 5.1.8. We **welcome** the proposal that Boroughs should identify sites for future provision (S2 A 4))

Policy S2 A should have an additional section 6) "recognise that pharmacies are a part of local health infrastructure and should be supported in local policies."

In **Policy S2 C:** Change to:

"New local facilities should be located where they are easily accessible on foot, cycling and by public transport. Boroughs are required to plan positively to identify accessible locations."

The STP process, like the issue of GP surgery closures, needs a more proactive approach by Boroughs to produce new practices in more accessible locations. This is a missing element. Instead of a reactive approach, the text of Policy S2 should have an additional item after 1) as follows 'Boroughs should plan positively to influence the location of new surgeries. See NPPF para 70.'

The STPs is a short-term initiative – we need to be planning proactively for the pattern of primary health provision over the next 10 years at least to ensure that new, reconfigured provision is located in accessible locations, such as town centres as part of any major development.

In **paragraph 5.2.2** Add at the end of the third bullet point "taking into account Policy HC1."

Paragraph 5.2.6 contains a key statement and needs cross-referencing with/to Policy D6.

Paras 5.2.1- 5.2.9: There needs to be a new paragraph which assigns a proactive role for securing GP practices in accessible locations, to match the headline message in Policy S2 – S2 A sets out the assessment/site identification process.

In **Paragraph 5.29** the following should be added ‘Hospital reconfiguration and changes in the key services they provide should balance the effective use of buildings, resources and skills with the requirement to reduce the need to travel, as in Chapter 10.’

User: London Food LInk /Sustain

We agree with the principle of high quality new and enhanced healthcare facilities being supported. We would encourage any guidance that sits alongside this recommendation to include consideration of adequate kitchen and dining facilities, as well as widespread access to free drinking water.

Our justifications in this section give examples of institutions whose physical infrastructure – supported in part by good decisions in planning and construction – provides the opportunities for healthier food for vulnerable people; healthy workplaces; income generation; and social cohesion - among many other important co-benefits.

e.g. The University Hospital of the North Midlands has on-site kitchens, allowing it not only to serve high quality food to patients, but also to source more local food and therefore enable it to take advantage of seasonal gluts in produce and cheaper bulk purchasing prices. The hospital can be more responsive to market conditions and change menus to keep costs affordable whilst meeting high standards.

User:	London Food LInk /Sustain

We propose that any hospital reconfigurations are not to the detriment of kitchen and dining space, and where this is not currently adequate, their inclusion should be considered in any reconfiguration alongside provision for healthy food retail and community food growing space

User:	Centre for Accessible Environments

C refers to facilities being accessible by public transport, cycling and walking however there is nothing specifically referring to the principles of inclusive design and access to enable a wide range of users to easily access facilities (similar wording to S3 B.7). Reference should be given to high quality, accessible design guidance and good practice e.g BS8330, Health Building Notes etc.

5.2.4, 5.2.5., 5.2.6, 5.2.7 STPs – reference to these is welcomed, including Health and Wellbeing Boards and liaising with key stakeholders in terms of informing Development Plans etc. However there appears to be no reference to the need to include Housing, Planning and Development in discussions. Research undertaken by Care & Repair showed that virtually no STP's meaningfully refer to the inclusion of housing despite its key relationship to health and wellbeing and hospital admissions, delayed discharge etc.

User: London Ambulance Service

We are currently developing our strategy for the next five years. This strategy will identify how the London Ambulance Service can evolve its role within the Integrated Urgent & Emergency Care sector, working with each of the five London Sustainability & Transformation Partnerships (STPs) to provide the most appropriate response to people living and working in London.

One of the key elements of our new strategy is the development of ‘Pioneer Services’ where we believe we can change the way that we respond to specific patient groups to provide better patient outcomes, as well as avoiding unnecessary hospital admissions. These pioneer services are falls, maternity, mental health and end of life care.

As part of these pioneer services, we want to expand the number of healthcare professionals working in our Clinical Hub as well as responding directly to patients. We know that some patients will receive a better service if we can send a response with specific specialist skills, such as a registered mental health professional responding to a patient in mental health crisis. Based on detailed modelling, which we are currently developing, we also think that responding in this way will make us more efficient and avoid unnecessary admissions to Emergency Departments.

We already have a consultant midwife working for us and staff have found this guidance and training invaluable. We also have mental health nurses working for us, they provide advice to staff, as well as supporting patients through our clinical hub and looking for alternative care pathways that suit the patients’ needs. We have done a considerable amount of work on end of life care, improving the training for staff, as well as implementing coordinate my care. We have already seen huge benefits from bringing these other healthcare professionals into our service and look to expand on these successes as part of our new strategy.

Urgent care APPs

The National Institute for Health and Care Excellence recently published draft guidelines on Paramedics with enhanced competencies. In the consultation they state that the development of paramedics with enhanced education that enables them to autonomously treat and discharge patients has the potential to reduce unnecessary hospital attendance, improve ambulance availability for higher acuity calls and deliver an improved service to patients.

We developed a role within London Ambulance Service for urgent care advanced paramedic practitioners (APP) who have additional training and skills aimed at treating more people at home and reducing hospital admissions. We now have 16 urgent care APPs working out of three sites in London. They attend all categories of calls and we have an APP in our emergency operations centre who identifies suitable incidents for them to attend. Data from Feb to March 2017 shows that 63% of patients treated were not taken to hospital. We're continuing to monitor this work and build on it through our strategy.

Our service planning and modelling is looking at the benefits and costs of these new services for our organisation, but also for the whole sector. We have demand pressures which our new strategy needs to address, but we also want to play our part in addressing the challenges the sector faces and reducing avoidable conveyances to hospital (where clinically appropriate) is one of the best ways we can do this. We are also acutely aware of the need to develop any services in conjunction with STPs and other providers. For instance, we will look to work hand in hand with Mental Health Trusts and Maternity Units when developing the relevant Pioneer Services to make sure that there is an overall system benefit and patient experience improvement

Our approach to the development of these services will include training staff to increase the base level of knowledge across our entire workforce as well as bringing in specialists in those fields, whether in our clinical hub and/or out on the road. Our staff have told us that they are very keen to work alongside other healthcare professionals so that they can learn from their expertise.

The other major part of our new strategy is our ambition to become a single point of access and triage to the urgent and emergency care sector, bringing together the 111 and 999 services across London. This includes a number of strands of thinking including expanding the ways by which members of the public can get in touch with us, particularly utilising video calls, web chats and other technology. One of the main advances that this single point of access would bring would be a single 'Clinical Assessment Service' across both 111 and 999, with a significant number of additional specialisms that would be able to provide telephone advice to patients. This is only in the early stages of thinking but could include frailty/falls specialists, registered mental health nurses, midwives, paediatric nurses, pharmacists, bariatric nurses and others.

In order to deliver our strategy effectively we recognise that we will need to make wider changes to our estates and information management and technology (IM&T). We are seeking to consolidate our estate, co-locating make-ready vehicle preparation hubs to support faster, consistent vehicle turnaround. We also want to provide better facilities for our staff and reduce our carbon footprint. We are also looking at how we transform our information management and technology (IM&T) Assessing and redeveloping our estate is a substantial project and we are currently scoping this work. The way we work is evolving; we are a fully mobile organisation and require different solutions and infrastructure to support us. We are working with the GLA and wider NHS through membership of the London Estates Board. As we develop our estates plans we would welcome support in ensuring that local planning prioritises provision for emergency service operations.

We are also working with the Metropolitan Police Service (MPS) and London Fire Brigade (LFB) to explore a number of collaboration opportunities, including shared estates.

The introduction of the Policing and Crime Bill (April 2017) mandates that all three emergency services have a statutory duty to collaborate and where there possible ensure that services operate in the most efficient and effective manner

As part of the London Blue light collaboration programme a bid was submitted to the home office Police Transformation Fund (PTF) to scope the possibility of a single call handling system and centralised control room for London's emergency services. This bid was a joint initiative by all three emergency services and we were successful in securing £1.9 million in the first instance to scope the merits of a single control room for London. This funding is purely for the scoping of the project but it will explore whether having a shared control room(s) for ambulance, police and fire would be beneficial for London.

We are also looking more broadly at how we could use estates more effectively between services and already share space with the London Fire Brigade.

Transforming the way we use IM&T is essential in enabling us to better assess and treat patients, as well as allowing patients to access our services in a variety of ways. By expanding the ways that patients can interact with us through technology we will be able to provide a more accessible service. It would also support our staff to do their jobs, providing them with technology to support clinical decision-making, link them to other clinicians and ensure that they have mobile access to connect them to wider service developments. We recently rolled-out iPads to frontline staff. The iPads come with three bespoke apps – JRCALC (clinical practise guidelines), MiDoS (a directory of services which will enable staff to easily contact GPs and other healthcare partners) and Co-ordinate My Care, which will mean staff can access patients' urgent care plans directly and in real time, instead of going through the Control Room.

We plan to publish our strategy in Spring 2018.

NHS England and NHS Improvement recently published their refreshed plan for 2018/19. Within the deliverables for 2018/19 ambulance trusts are expected to deliver a safe reduction in ambulance conveyance to emergency departments. This is something we are already working on through the introduction of Urgent Care Advanced Paramedic Practitioners and alternative care pathways.

In North West London we have introduced two alternative care pathways that operate across the sustainability and transformation area. The prevention of admissions pathway and mental health pathway help our staff ensure that patients are taken to the most appropriate place, which is not always A&E.

Prevention of admissions pathway

In North West London we are working with the North West London Collaboration of Clinical Commissioning Groups to make sure that patients who can be treated at home don’t make an unnecessary trip to A&E. Our staff have received training about how rapid response and community support services can help patients to stay well at home. Staff can now refer directly to rapid response teams in the area who, depending on the patients’ clinical need, may visit multiple times. Rapid response teams have been operating in North West London for several years and this partnership helps ensure that more eligible patients are supported by these teams. Rapid response teams include nurses, occupational therapists, physiotherapists and health care assistants. From April 2017 to date, more than 1000 patients have been referred by us to rapid response teams. As a result, this releases our staff quicker and helps patients avoid unnecessary trips to A&E. We are currently analysing referral data to identify how many patients avoided admission to A&E during this period.

User:	Arcadis LLP

The plan recognises a move to larger catchments for Primary Care in Policy 5.2.5. However, the implications of what this means for future provision through spatial strategy is not clear. The location of new facilities at points of high accessibility is one objective that should be encouraged.

User: McCarthy and Stone Retirement Lifestyles Ltd.

Policy S2 (204) -Health and Social Care Facilities

DLP should ensure that linkages are made to the provision of retirement housing which can help make considerable savings to the public purse and in particular savings to the NHS.

The Select Committee Report in its recommendations and under the heading “The Link Between Housing and Health” advises:

There is a well-evidenced link between housing and health and wellbeing, and the consequent costs of treatment by the health service. Poor quality, un-adapted, hazardous, poorly heated and insulated accommodation can lead to reduced mobility, depression, chronic and acute illness and falls and social isolation to loneliness and depression. We recommend that prevention, early intervention and promotion of health and wellbeing through housing should be a priority for the national advice service. It should refer people to where they can get practical help to improve the quality of their home and to their local authority and health service if more immediate, direct intervention is needed.

The right kind of housing can keep people healthy, support them to live independently and reduce the need for home care or residential care. The Social Care Green Paper, planned for publication in summer 2018, must consider the range of housing for older people, from mainstream and accessible homes to supported and extra care housing, as well as access to adaptations and repairs. In particular, the Social Care Green Paper should consider the role of Extra Care housing in the provision of social care alongside domiciliary and residential care.

Without the right physical and mental support in place for older people, there is likely to be increased pressure placed on the health service and adult social care due to an increase in slips, trips and falls as people age in accommodation no longer suitable for their changing needs. A study by the Homes and Communities Agency found for a typical person aged 60 and above, moving to a suitable retirement development generates health and social care savings of £3,500 a year due directly to the benefits of ***this*** *form of housing.****[1]***

There are therefore considerable linkages between the provision of housing for older people and health and social care facilities, which the Mayor should focus more closely on in the formulation of policies within the DLP. The Plan ought to be revised to reflect this, in order to encourage the provision of more of the housing that is so clearly required to address the nation’s pressing health needs.

Recommendation: We strongly support the DLP aim to plan for improvements in health and social care facilities. The contribution that Retirement Housing makes in this regard should however be highlighted in order to encourage the further delivery of such development.

[1] A study by the Government body the Homes and Communities Agency in 2010 found for a typical person aged 60 and above, moving to a suitable retirement development generates health and social care savings of £3,500 a year. Figures updated for inflation.

User: Ms Philippa Manasseh

There will be a need for medical facilities. Currently GP services in the area are inadequate and this provides the perfect opportunity to correct this. The Earls Court Masterplan envisages a private hospital on the site. Given the ongoing campaigns to save our local major hospitals and their A & E departments, this is not acceptable. The closure of the Thamesbrook Extra Care facility off the Kings Road has lost over 50 beds to the Royal Borough with currently no work started on a promised replacement. Here is an opportunity for some joined up thinking – let us look at building a cottage hospital, as well as a rehabilitation centre and convalescence home which is publicly owned and run for the benefit of the whole community.

Sources

Johnson, Darren, AM, Letter 20 June 2013 to Boris Johnson

Save Earl’s Court Campaigners & Save Earl’s Court Supporters Club: Earl’s Court, Rescue,Recovery , Renaissance. (2017)

Earl’s Court Master Plan

User:	London Borough of Hammersmith and Fulham
Please refer to the council's PDF response submitted by email for comments on this policy.	

User:	London Borough of Hammersmith and Fulham
Please refer to the council's PDF response submitted by email for comments on this paragraph.	

User: London Borough of Hammersmith and Fulham

Amend Paragraph 5.2.4 as follows:

Sustainability and Transformation Plans (STPs) were produced by the NHS and local Government in 2016 to set out how local health and care services would evolve and become sustainable by 2020/21. Five sub-regional STPs were developed in London. These five-year plans set out in varying levels of detail the proposed changes to NHS hospital estates and primary care facilities in each area. LBHF and Ealing Councils did not agree with the NWL STP plans for reductions in local acute hospital capacity and challenged the evidence submitted in the Strategic Outline Case Part 1 (SOC1) business case. The NHSI rejected the business case because of its unrealistic estimates of achieving reduced hospital admissions.

User: London Borough of Hammersmith and Fulham

Amend Paragraph 5.2.7 as follows:

Where population growth and change is taking place at fairly modest levels, it may be possible to accommodate this through a combination of **efficiency savings, service reconfiguration and small adjustments in capacity**, for example, through the conversion of non-clinical space to consulting or treatment rooms. In areas of high or concentrated population growth, particularly in Opportunity Areas, it is more likely that **new primary and community facilities or** acute **capacity will need to be provided**. Boroughs have a key role to play in ensuring that the need for health and social care facilities is assessed, that sufficient and appropriately-located sites are allocated for such facilities, and that mechanisms are in place to secure their provision through, for example, Section 106 or Community Infrastructure Levy contributions.

User: London Borough of Hammersmith and Fulham

Amend Paragraph 5.2.9 as follows:

Development and regeneration proposals for an area provide an opportunity to re-think how land and buildings are used and whether there is a more optimal configuration or use of that land. Hospital reconfigurations are an example where more intensive and better use of a site can lead to a combination of improved capacity, facilities and the creation and release of surplus land for other priorities. The London Estates Board aims to improve the way surplus and underused NHS assets are identified and released, and provide a single forum for estate discussions in London, ensuring early involvement of London Government partners. Membership includes NHS partners, local Government, the GLA and national partners (central Government, NHS England, One Public Estate and the national NHS property companies). Whilst the London Estates Board provides a single forum for discussions it cannot override the local democratic accountability and engagement required in decisions about local borough NHS estates and hospitals.

Our main objective is to safeguard Charing Cross hospital and its facilities for the foreseeable future. We feel that this paragraph undermines our ability to achieve this ambition

User:	The Pinner Association
Support – if this compels some joined up thinking in the planning of the increased health and social care infrastructure which will be required should the proposed additional housing be built.	

User:	Royal Borough of Kensington and Chelsea

5.2 Policy S2 Health and social care facilities

It is recommended that Policy S2 C is revised to read the following;

"New facilities should be easily accessible by public transport, cycling and walking. To help prevent and or mitigate the impacts of noise and poor air quality to these facilities, 18

any habitable rooms and external amenity should be designated away from the main sources of poor air quality and noise."

User: London Borough of Islington

Chapter

Social Infrastructure

Draft London Plan Policy

Policy S2 Health and Social Care Facilities

Islington Response

The policy sets out the approach to London's health care services including identifying needs, taking account of NHS plans and supporting provision of new high quality facilities. Whilst we welcome the shared use of infrastructure assets, experience has shown that this is not always straightforward; for example, where the NHS reimburses GP practice rent, it will not reimburse rent for other health uses such as community healthcare, commissioned by the CCG. With GP practices unable to take on the risk associated with the lease, this is a significant barrier to sensible co-location of services.

Other issues which could be made clear in the supporting text include making boroughs work with their CCGs to understand the implications of lease expiry on primary care premises leased from the commercial centre, as well as impacts on the primary care estate of retiring single-handed practices where the GP owns the premises. Finally, the policy approach needs to be clear and to state explicitly that loss of healthcare facilities will not be supported until it has been demonstrated that adequate alternative provision has been provided, or that the loss accords with Policy S1(F)(2).

User:	Battersea Society Planning Comittee

We endorse the proposals set out in the following and trust that action will be taken without delay.

Policy S1 Developing London’s social infrastructure and Policy S2 Health and social care facilities (though both these are laudable they do require a holistic approach to policy delivery outside merely the planning system)

User: London Borough of Barnet

This suite of policies highlights the need for boroughs to undertake a needs assessment of social infrastructure and identify sites for future provision. New facilities should be easily accessible by public transport, cycling and walking. Proposals resulting in a loss of social infrastructure (includes health, provision, education, community and recreation) as well as green infrastructure in “areas of defined need” should be refused unless able to be re-provided. Also, that redundant social infrastructure to be considered for other social infrastructure types before any alternative development. Whilst supportive of the intent of these policies and investment in infrastructure, we would welcome more support from the Mayor in helping to deliver infrastructure.

We welcome Mayoral support for importance of ensuring suitable childcare provision and accessibility of play spaces by active travel as planning considerations. However, the new London Plan should recognise that detailed planning for social infrastructure is best achieved at Borough level so as to ensure proper account is taken of the different needs and priorities of individual communities and neighbourhoods. Public health intelligence can be used to identify the needs of communities as well as gaps in social infrastructure. Barnet’s new Local Plan will therefore consider local health intelligence when identifying priorities.

User: N\A

Finally, it is good news that links have been made with the NHS to improve health for Londoners. This work must urgently address the lack of GP provision to support new developments. In Barnet, we have delivered a number of health centre buildings with the agreement of the NHS, only to have them turned down by successor NHS organisations. For many Barnet residents, the reality of housing growth boils down to their experience of unacceptably long waiting times for GP appointments, and as a result we are beginning to see stronger and more vociferous opposition to new development.

User: London Assembly Labour Group

Suggested changes:

Add the words “workforce planning” to para S2A, which now read “Boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to:
1) identify and address local health and social care needs within Development Plans taking account of NHS Forward Planning documents and related commissioning and estate strategies, workforce planning, Joint Strategic Needs Assessments and Health and Wellbeing Strategies.”

Justification for policy recommendations

The NHS relies on its workforce to function. Especially considering Brexit there are serious concerns about having enough healthcare workers to sustain the work the NHS does, particularly in London. Addressing local health and social care needs will need to take into account workforce planning.

User:	Stonewall Housing

In **POLICY S2**, the London Plan explains the importance of social infrastructure and Stonewall Housing recommends that this should include the development of services for our communities since they may not access mainstream services or may prefer services delivered by and for their own communities.

User: London Assembly Planning Committee

We are strongly committed to ensuring that all possible steps are taken to ensure equitable access to health and care services, which is a key consideration in reducing health inequalities in London.

Recommendations We agree with the supporting narrative set out at 5.2.7 with a minor wording change; that “boroughs have a key role to play in ensuring that the need for health and social care facilities is assessed, that sufficient and appropriately-located sites are allocated for such facilities, and that mechanisms are in place to secure their timely provision.”
6.9 The Health Committee wishes to avoid scenarios in which residential development is permitted without clarifying the maximum permitted timescale for securing the necessary accompanying health and care infrastructure. See our response to Policy S1 above.

User:	London Waste and Recycling Board (LWARB)

1. We support Policy S2A point 5 and paragraph 5.2.8 for co-location of facilities and integration with other forms of social infrastructure and uses as this increases asset utilization. This might also include temporary meanwhile uses or release space for community social enterprises in the circular economy. For example ReSpace: [http://rally.respaceprojects.org/].

User:	London Waste and Recycling Board (LWARB)

1. We support Policy S2A point 5 and paragraph 5.2.8 for co-location of facilities and integration with other forms of social infrastructure and uses as this increases asset utilization. This might also include temporary meanwhile uses or release space for community social enterprises in the circular economy. For example ReSpace: [http://rally.respaceprojects.org/].

User:	Ealing Save Our NHS (ESON)

S2 C Add ‘private transport pick-up and drop-off’ to the list

5.2.1 London’s social care population is excluded for this planning guideline. (With 1.5 million social care workers in England as opposed to 1.3 million healthcare workers, London’s social care staff population is almost certainly larger than that of London’s healthcare population).

5.2.2 For ‘healthcare’ replace with ‘care’.

In 5.2 a whole new section is required on social care infrastructure provision which should ‘mirror’ the healthcare infrastructure guidelines at 5.2.3, 5.2. 4 and 5.2.5.

5.2 7 Add ‘social care’ references

User:	London Borough of Lambeth

Lambeth supports this policy. Local public health teams are well placed to work with partners on this issue.

User:	London Borough of Haringey
The Policy is supported	

User:	London Cycling Campaign
Add: by public transport, ***high quality*** cycling ***routes*** and walking	

User:	London Borough of Barking & Dagenham

The Council supports the principles set out in these policies as we work (through our corporate strategies) to ensure that Barking and Dagenham becomes a place which supports residents to achieve independent, healthy, safe and fulfilling lives. However, the GLA should take a bigger role in coordinating the planning and sharing of best practice for the development of such facilities given the cross-borough nature of such facilities. The Council supports the co-location of facilities with other uses in order for the more efficient use of land and to enable more integrated service delivery. For Barking Riverside and Thames ward an innovative and integrated health and care facility is being developed as part of the Healthy New Towns programme. This is offered as a case study and example of best practice.

User: London Borough of Lewisham

We strongly support S2 as we are already taking this approach. Many voluntary sector organisations and other health organisations operate from Council buildings, and vice versa. We are in partnership health partners through the One Public Estate programme, looking primarily at what services are required and where, better collaboration, resulting in new and improved facilities, co-location of local teams and releasing surplus land for new homes. S2 is in line with our aspirations for Catford town centre.

Further consideration should also be given to:

- Viability and what funding is available to pay for social and health facilities.
- The need for agreement with local STPs for capital health projects.
- The retention of capital receipts negotiated with Central Government.
- The balance between provision of expensive health infrastructure and affordable housing.

User:	London Borough of Brent
The policy is supported.	

User:	London Borough of Bromley

The Council engages with health stakeholders and Bromley Adult Social Care

The Council supports the co-location of services with draft Local Plan Policy 21c specifically encouraging ‘hubs’.

User: Carol Robson

I propose that the London Plan includes policy to restrict the sale/use of NHS land unless the following points are given proper consideration:

- I am concerned at the damage that would be done to the NHS estate, and to the contribution of planning to London, if any sale of NHS land in London takes place before a strategic framework is in place that has been subject to meaningful public consultation.
- there are several options that provide better value for money, and more public benefit, as well as housing gain, than a straight sale of NHS land.
- When any NHS land is identified as not being in clinical use, the Mayor should encourage the NHS to adopt a sequential test to appraise the use options for the land.
- **Buildings currently in clinical use -** The useful life of a healthcare building today is often as short as 30 years. Furthermore, clinical services change frequently, driving frequent internal reorganisation within buildings. Where there is a backlog of maintenance, it will be important in each case to consider, first, whether there is a business case for carrying out that maintenance. This must be compared with a business case for renovating, adapting or even replacing the building. Until these determinations are known, there can be no responsible decision to sell any NHS land that is available for this purpose.
- **Expansion, replacement, and new facilities -** Where the NHS owns land that is convenient for expansion and replacement of facilities, this should be retained.
- **Step-down care -** Experts consider that it is bad value for money for the government to sell NHS land for private house-building when such land, much of it co-located with hospitals, or in their vicinity could be used for “step-down” care to relieve acute beds.
- **Residential units for NHS staff -** Building co-located residential units for NHS staff mitigates many problems in a single sweep, e.g. staff located near to work will be housed locally in good quality housing allowing them time to rest rather than commute and would be a big selling point when recruiting NHS staff.
- **Land swaps with other public-sector land -** The Mayor should encourage the NHS not to dispose of land until it has been considered for other public uses by all local stakeholders.
- **No unsuitable developments on former NHS land near hospitals -** If, at the end of this sequential test, there is a case for selling any NHS site into the private sector, then the Mayor should favour a planning policy that prevents any type of development that would be unsuitable near any hospital.

User: London Councils

This policy should state that health and social care facilities rents, including in private developments, should be provided at affordable levels, as without this their long term provision is in doubt. Health and social care provision also needs to be factored into the balance of what should be (and can be) delivered through planning obligations.

London Councils supports the principle of colocation of health facilities, although it is complex to make this happen in practice because of the different funding and decision making structures/arrangements of different providers/organisations.

Criterion A (5) - Welcome shared use of infrastructure assets, although this may be problematic in practice. For example, some boroughs' experience has been that as the NHS reimburses GP practice rent, but it will not reimburse rent for other health uses, such as community healthcare, commissioned by the CCG. With GP practices unable to take on the risk associated with a lease, this is a significant barrier to sensible co-location of services.

User: London Borough of Tower Hamlets

The policy supports innovative approach to new models of care, which is supported.

We support the proposal for Boroughs to work alongside CCGs / NHS / community organisations to identify and address local health and social care needs within Development Plans.

The new policies also support a more flexible approach through integration, co-location or reconfiguration to release of surplus buildings and land for other uses. This should be done with particular care to ensure that LA's opportunities to address current and future needs are not compromised by change of use from health facilities to other types of uses. In addition, co-location should consider suitable types of uses to avoid conflicts of impacts associated with those types of uses – e.g. noise, pollution etc.

However, the policy removes the requirement for any replacement health service to be operational before the facilities they replace are closed. This is considered a risk to the continuous adequate provision of needed health facilities and the previous wording should be reinstated.

User:	Royal Borough of Kingston
Support.	

User:	London Borough of Merton

Support The Policy is supported. However the policy places emphasis on boroughs working with the CCG. We would encourage the Mayor to support the CCGs in working with the boroughs on planning for future primary healthcare needs.

User:	London Borough of Hounslow
LB Hounslow supports this policy	

User:	London Borough of Hackney
Hackney supports this policy.	

User: Westminster City Council

Whilst the objectives of the policy are supported, the requirement that boroughs “identify sites in Development Plans for future provision, particularly in areas with significant growth and/ or under provision” fails to fully recognise the extent to which boroughs’ ability to do so is dependent on the actions of multiple agencies responsible for health care planning, often working to different timescales. These in turn reflect wider policy decisions about how health services should be provided. It is therefore suggested that criterion A4 is reworded as follows:

“where possible, identify sites in Development Plans for future provision, particularly in areas with significant growth and/or under provision”

Criterion A(5) merely states the obvious. At most it belongs in the supporting text.

User:	London Borough of Southwark

The Council considers it may be appropriate to prioritise the provision of social infrastructure such as primary health care facilities over the provision of affordable housing where a development cannot provide a policy compliant affordable housing contribution for reasons of viability. It is recommended the policy is amended to reflect this.

User:	London Borough of Wandsworth

The Council supports the policy as it provides continuity from the previous London Plan Under Section B of the policy we would recommend that development proposals should consider flexibility in context of design to facilitate new models of care which may emerge over time.

User:	London Borough of Richmond Upon Thames

The Council supports the policy as it provides continuity from the previous London Plan.

Under Section B of the policy we would recommend that development proposals should consider flexibility in context of design to facilitate new models of care which may emerge over time.

User: London Borough of Harrow

The Policy is supported.

As noted in the response to Policy H2: Small Sites, the Council is concerned about the impact of that policy on the ability to plan for infrastructure such as health. This concern is understood to be shared by NHS Clinical Commissioning Groups, such as North West London CCG, who have indicated: “The policy and ten-year targets in Table 4.2 would significantly increase the contribution of small sites (below 0.25 hectares in size) to meeting London’s overall housing delivery. The capacity of small sites represents 38% of all supply and has increased from 25% in the current Plan (the 2013 SHLAA). In some outer London boroughs (Sutton, Richmond, Bromley, Bexley and Harrow) small sites contribute to over two thirds of housing supply, whereas in the two Development Corporations the contribution is less than 5%. Part D of the policy requires boroughs to apply a presumption in favour of small housing developments which provide between one and 25 homes. Given the . policy presumption, the cumulative impact of small developments on health infrastructure could be significant, particularly in parts of London which have traditionally experienced relatively low growth. We would expect that this impact is addressed as part of the borough infrastructure planning process, but given the ‘windfall’ nature of small sites this impact will be difficult to predict and plan for. As a result there is a risk that the cumulative impact of small developments on health infrastructure in some boroughs will not be adequately addressed.”

User:	Royal Borough of Greenwich

S2A(4)

While we support the focus on partnership working to identify suitable sites, we note that these organisations typically plan for a maximum of 5 years ahead which can cause difficulties with identifying sites within Development Plans, both because of the minimum 2 year production timetable for DPDs and the longer time frame that must be covered.

User: Rooms of our Own

Policy S2

i. We would like the Mayor to give a strong commitment to lobby for a massive injection of funding into our NHS and Social Care. The current government is driving these vital services further and further into the ground every year. We need a strong voice to stand up for Londoners and demand proper level of resourcing to meet the need.

ii. Again, vehicles are important . Most sick people cannot easily walk, cycle or use public transport. Many voluntary groups organise food banks, exhibitions, outings and all kinds of health and social care activities that require vehicles. Certainly promote electric cars but good routes and nearby parking are important.

iii. More emphasis needs to be given to all the various types of health provision in its widest sense provided by the voluntary and community sectors; from specific illness support groups to groups fighting for cleaner air.

User: London Borough of Havering

Paragraph 5.2.4

As with Policy S1, Havering recognises and strongly supports the importance of health and social care facilities being provided in a timely and effective manner.

Reference is made to Sustainability and Transformation Plans (STPs).The STP for East London describes the types of actions that should be taken but not specific commitments.

The draft London Plan should explain how the Mayor will engage with NHS Estates to ensure that the aims and objectives of managing estates focus on providing the right services for people in east London. This section of the London Plan should go further in describing the partners who will be engaged in early discussions re the use of NHS assets, such as patient representative groups (such as Health and Well-being Boards,. Healthwatch and/or voluntary organisations), also professional groups, such as Association of Directors of Public Health.

User: Aspire

Health Care facilities

All new health care premises should be inclusive and accessible for a range of users including disabled people, and developed following inclusive design principles. Where new health services are being proposed for location in existing buildings undergoing a change of use, these to must be inclusive and accessible to all the community including disabled people and the premises must be required to follow inclusive design principles. For example a dental practice seeking to occupy premises above a shop should only be granted permission where a wheelchair accessible lift is provided to the practice and all parts of the premises to which the public would normally have access are also wheelchair accessible.

Furthermore, the location of new services must be considered in relation to the provision of public transport infrastructure and in particular the presence of genuinely wheelchair accessible national rail and London Underground Stations.

User:	London Borough of Enfield

Policy S2 looks at ‘Health and social care facilities’. It fails to take into account the need to plan for longer than the NHS Five Year Forward View. There is also no mention of the requirements for Health Impact Assessments (HIAs) or the Mayor’s SPG on social infrastructure. Further to this, the Plan needs to set out how the GLA are working with Sustainability and Transformation Plans (STPs) to identify healthcare need over the Plan period. There also needs to be clarity with regard to the commitments of the London Estates Board. Finally, the policy needs to make reference to the shortage of healthcare professionals due to London’s living unaffordability, with measures proposed to improve this situation.

User: Mama Ujuaje

Recommended wording:

A. Boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to:

1. identify and address local health and social care needs within Development Plans taking account of NHS Forward Planning documents and related commissioning and estate strategies, Joint Strategic Needs Assessments and Health and Wellbeing Strategies

2. understand the impact and implications of service transformation plans and new models of care on current and future health infrastructure provision in order to maximise health and care outcomes

3. regularly assess the need for health and social care facilities locally and sub- regionally, addressing borough and CCG cross-boundary issues

4. identify sites in Development Plans for future provision, particularly in areas with significant growth and/or under provision. These will include a better relationship between food provision and public access to sites for food growing which has been shown to support and enhance community public health statistics and overall well-being.

5. identify opportunities to make better use of existing and proposed new infrastructure through integration, co-location or reconfiguration of services, and facilitate the release of surplus buildings and land for other uses, including for community access to green and brownfield sites for food growing and the development of community food hubs with multiple benefits for town centres and the suburbs.

B. Development proposals that support the provision of high-quality new and enhanced facilities to meet identified need and new models of care should be supported. Some of which can offer public health routes to new care models which promote community self-reliance

C. New facilities should be easily accessible by public transport, cycling and walking.

5.2.1 London’s health care services are vital to maintaining and improving Londoners’ quality of life. The health service is also one of the capital’s major employers, with over 200,000[63] people working in the NHS in London. Several factors affect the demand for health services and facilities. These include a growing and ageing population, an increase in complex and long-term health conditions that need an integrated approach, and changes in patients’ personal preferences. New treatments and technologies are also transforming the ability to predict, diagnose and treat conditions. Studies on dietary intake, levels of access to green space and accessible and affordable exercise have also been shown to have an impact of public health and well-being and so should be factored in when making choices in land use and in social prescribing to promote community self-reliance and agency in determining resilience and well-being.

5.2.2 The NHS Five Year Forward View identifies the need to prevent avoidable illness and transform the way that care is organised and delivered in order to meet increasing demands for healthcare within the resources available. It describes the following priorities:

- supporting and enabling individuals to take better care of their own health and the health of their families and communities
- undertaking a higher proportion of healthcare in community rather than hospital settings
- making best use of available assets, including more flexible approaches to how facilities are used and the overall configuration of the health estate, which requires a mix of dis-investment in older, out-of-date facilities and re-investment in more modern, fit for purpose estate
- ensuring that models of care change and continuously evolve
- ensuring that existing and planned new health infrastructure supports and facilitates change.

5.2.3 There are currently four broad types of health infrastructure provision:

- primary care – GP practices, plus community pharmacists, dentists and opticians
- community healthcare – this covers a wide range of diagnostic and healthcare services, including non-acute mental health services, which provide a means of delivering care closer to home than from a hospital setting, which includes a range of preventative options available based upon attention to diet, exercise and access to green space and spaces for social interaction.
- acute provision
- specialist provision

5.2.4 Sustainability and Transformation Plans (STPs) were produced by the NHS and local Government in 2016 to set out how local health and care services would evolve and become sustainable by 2020/21. Five sub-regional STPs were developed in London. These five-year plans set out in varying levels of detail the proposed changes to NHS hospital estates and primary care facilities in each area.

5.2.5 Whilst there is no one-size-fits-all model of care, and an increasing blurring of the boundaries between primary, secondary (acute) and tertiary (specialist) health services, there are some broad underlying principles that underpin the planning of new facilities or changes to existing facilities. The NHS General Practice Forward View [64] supports the provision of primary care at greater scale, with larger practices and/or more joined up networks of GPs offering a wider range of services to patients, including extended opening hours. This means fewer GP practices serving larger patient catchments (perhaps 10-20,000 people per practice) and operating from larger premises than is the norm at present. Models of community healthcare are based around larger population catchments (50,000 or more people) or localities to ensure individual services are viable, and to maximise the benefits of integrating and/or co-locating services in community healthcare centres or hubs of all kinds including food hubs, or in more flexible ways across localities or networks of service providers.

5.2.6 In assessing the need for new health and social care facilities, consideration should be given to the location, scale and timing of new residential development, and the quality, capacity and accessibility of existing health and social care facilities to meet some or all of the growth. Joint Strategic Needs Assessments produced by local Health and Wellbeing Boards describe the current and future health and wellbeing needs of the local population and identify priorities for action which are set out in more detail in the Boards' Health and Wellbeing Strategies. These documents are valuable sources of evidence to inform the development and review of Development Plans. Other forms of evidence are the numerous reports produced by public health and community garden facilities, often in conjunction with specialist bodies which prove and support the link between access to healthy food and accessible exercise and green space for leisure and social interaction and improved health and well-being outcomes.

5.2.7 Where population growth and change is taking place at fairly modest levels, it may be possible to accommodate this through a combination of efficiency savings, service reconfiguration and small adjustments in capacity, for example, through the conversion of non-clinical space to consulting or treatment rooms. In areas of high or concentrated population growth, particularly in Opportunity Areas, it is more likely that new primary and community facilities or capacity will need to be provided. Boroughs have a key role to play in ensuring that the need for health and social care facilities is assessed, that sufficient and appropriately-located sites are allocated for such facilities, and that mechanisms are in place to secure their provision through, for example, Section 106 or Community Infrastructure Levy contributions. Design plays an increasingly significant role in how communities can access healthy spaces and health food as well as engage in more social interaction and so support health promoting behaviour.

5.2.8 The co-location of facilities with other uses, such as other forms of social infrastructure or housing, is encouraged to use land more efficiently and to enable a more integrated service delivery. This is in line with promoting development of lifetime neighbourhoods in which communities can live, work and interact socially in ways which minimise the need to travel long distances by car and encourage greater social cohesion and integrated living spaces. A community hub is centred upon the attainment of well-being through a range of social and cultural factors, central to which is how we access our food. Food production hubs can play a useful role within the city. These are light-industrial, integrated, co-located developments which involve food growing, local food processing and market/distribution outlets which provide alternative, local food systems and which provide jobs and ‘green outlets’ and a sense of self-determined local futures. Imported foodstuffs can be sourced via regional wholesale centres or directly sourced from sustainable food linkages and can be processed in these food hubs. They can provide social spaces as well as job and training opportunities which are connected to a range of cultural understandings of what a lifetime neighbourhood means in practice. If designed into plans for town centres or high streets they can:

1. Encourage the start-up of SME community based food hubs
2. Work in partnership with schools and colleges to encourage food based businesses by offering training skills in food growing, marketing and distribution as well as environmental management, managing food-waste, and addressing food poverty
3. Provide a variety of skills to encourage localised, self-reliant development within each borough, and also facilitate advantageous cross borough connections which can benefit London as a whole and households across each region.
4. Develop strategic partnerships between public health initiatives, community food hubs and social prescribing to optimise benefit to local communities in terms of well-being, reduced social isolation, improved mental health and social enterprise

5.2.9 Development and regeneration proposals for an area provide an opportunity to re-think how land and buildings are used and whether there is a more optimal configuration or use of that land. Hospital reconfigurations are an example where more intensive and better use of a site can lead to a combination of improved facilities and the creation and release of surplus land for other priorities. The London Estates Board aims to improve the way surplus and underused NHS assets are identified and released, and provide a single forum for estate discussions in London, ensuring early involvement of London Government partners. Membership includes NHS partners, local Government, the GLA and national partners (central Government, NHS England, One Public Estate and the national NHS property companies). Rethinking of the use of public health facility space also provides the opportunity to incorporate health promoting activities such as community food growing and open and accessible exercise facilities which also support social integration and mental health.

User: Inclusion London

Policy S2 Health and social care facilities

The Draft London plan proposes that boroughs work with Clinical Commissioning Groups (CCGs), the NHS and community organisations on health and social care provision and facilities. We would welcome the involvement of DDPOs to voice the needs of Deaf and Disabled people but many DDPOs need funding into order to engage in the process. As previously mentioned we recommend that the Mayor develops a strategy to ensure that DDPOs in London are funded.

Integration of health and social care

We have some concerns regarding the integration of health and social care

There is a different culture of involvement in health compared with social care. There are health services where patients are recognised as experts by experience and services are co-designed[1] but they are the exception rather than the rule. The opportunity of co-decision making by patients is generally low in the health services. While the control of the disabled person receiving care is set in legislation, as according to the Care Act 2014 the delivery of care services should be controlled by the individual.[2] A change of culture is needed in health services so services are co-designed with those receiving services.

Lack of funding

However, even though the Care Act 2014 requires control by the individual over their social care this is often scuppered by lack of social care funding. Cuts in funding has resulted in a very basic clean and feed model of care in many areas of London and Disabled people are being required to contribute more towards care. Lack of funding also threatens the whole integration of health and care according to research funded by the government.[3]

[1]http://www.innovationunit.org/projects/living-well-collaborative/

http://lambethcollaborative.org.uk/

[2] http://www.legislation.gov.uk/ukpga/2014/23/part/1/crossheading/general-responsibilities-of-local-authorities/enacted

[3] http://www.communitycare.co.uk/2016/05/13/cuts-making-difficult-achieve-health-social-care-integration-warns-research/

User: Just Space

Policy S2 Health and social care

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

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

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

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

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

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

- Cuts to children's centres, youth clubs and play spaces across London contribute to child obesity and depression. We support the aspiration of the *Alliance for Childhood London Forum* to make London a Child Friendly City and this requires all of the proposals in this chapter to be looked at from a child's point of view.

- The Mayor to champion accessible and inclusive health services and to use his power to elevate groups who are being excluded, like Gypsies and Travellers, migrants, refugees and the BME community.

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

A space is healthy

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

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

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

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

User:	London Borough of Bexley

Paragraph 5.2.4 in the supporting text to **Policy S2 Health and social care facilities** refers to Sustainability and Transformation Plans. However the initiative has recently been named by some NHS organisations as Sustainability and Transformation Partnerships. The correct term should be clarified and used in the Plan.

User:	London Healthier Places

The LHP Network strongly supports the policy for closer working and collaboration between Councils, the CCG and other NHS and community organisations to better identify local needs and provision for health, social and community facilities .

User: NHS England

We agree that London's health care services are vital to maintaining and improving Londoners' quality of life, and we welcome the proposals within Policy S2.
We welcome the reference to taking the 'One Public Estate'2 approach to managing health and care estates in the enabling infrastructure section (Chapter 11) and the general focus on supporting the delivery of efficient and effective healthcare estates in Policy S2. This is generally in line with the Government's recently published response to the Naylor review of NHS estates. However we believe the plan could do more to support one recommendation approved by Government by including specific reference to supporting the NHS to develop surplus land into homes for NHS staff. The Government's response stated this was a focus in areas where cost of housing has an impact on staff retention so has particular relevance to London.

In addition to its significant estates, the NHS is also a major employer, and buyer and transporter of goods. As a result of this, it has a significant carbon footprint. We expect London's health organisations to reflect the principles of the London Plan in their organisations' Sustainable Development Management Plans, detailing how they will minimise any negative impacts the organisation has on population health through their environmental, social and economic footprints. We recommend that the plan (Policy S2) requires Local Authorities and CCGs to work together, identifying where they can help deliver their respective sustainable development plans. We would also support the inclusion of a specific reference acknowledging that every NHS organisation holds these plans, in order to increase awareness of them amongst Local Authorities.

2 One Public Estate (OPE) is a national initiative managed by central Government to enable public sector organisations to 'rationalise their asset and estates management'. This includes encouraging public sector bodies to share buildings where appropriate.

User:	Ministry of Housing, Communities & Local Government

The Mayor will want to consider how his London Plan supports the use of developer contributions for new or expanded facilities needed across wider public services as a result of population growth. We recognise the importance of promoting healthy lifestyles, the London Plan should contain policies appropriate to a strategic framework to support this.

User: London NHS Clinical Commissioning Group

Policy S2 Health and social care facilities

We support clause 5 of Policy S2 which seeks to identify opportunities to make better use of existing and proposed new infrastructure through integration, co-location or reconfiguration of services. In addition, there is the need to take a more flexible approach to the use, design and management of new buildings to ensure that they match population growth and changing health needs, changing models of care and are fully utilised and affordable. In some cases, meanwhile uses could be considered – see Policy H4. The draft Health Inequalities Strategy, under the Healthy Communities aim seeks to make best use of local assets and support the voluntary and community sector.

We suggest that new clauses are added to Policy S2 to set out a requirement for boroughs to mitigate the cumulative impact through infrastructure planning and CIL and seek developer contributions to address site specific impacts, to read as follows:

“D Planning Obligations (S106 agreements) including financial contributions will be sought to mitigate impacts from development, which may be cumulative. Such obligations and contributions may include the provision of new and improved health services, capacity and infrastructure.”

“E The health and social care infrastructure needs should be set out in the relevant Infrastructure Delivery Plan and borough’s CIL Regulation 123 schedules and other funding streams identified to ensure that facilities and services are delivered in line with developments.”

We consider that new supporting guidance is needed to clarify the relationship between Policies S1 and S2, provide a methodology to assess the need for health infrastructure as part of the local plan and planning application processes and provide guidance to ensure that, where new facilities are included as part of development proposals, they are well designed and affordable.

User: Alexander Andipas

I propose that the London Plan includes policy to restrict the sale/use of NHS land unless the following points are given proper consideration:

I am concerned at the damage that would be done to the NHS estate, and to the contribution of planning to London, if any sale of NHS land in London takes place before a strategic framework is in place that has been subject to meaningful public consultation.

There are several options that provide better value for money, and more public benefit, as well as housing gain, than a straight sale of NHS land. When any NHS land is identified as not being in clinical use, the Mayor should encourage the NHS to adopt a sequential test to appraise the use options for the land.

Buildings currently in clinical use - The useful life of a healthcare building today is often as short as 30 years. Furthermore, clinical services change frequently, driving frequent internal reorganisation within buildings. Where there is a backlog of maintenance, it will be important in each case to consider, first, whether there is a business case for carrying out that maintenance. This must be compared with a business case for renovating, adapting or even replacing the building. Until these determinations are known, there can be no responsible decision to sell any NHS land that is available for this purpose.

Expansion, replacement, and new facilities - Where the NHS owns land that is convenient for expansion and replacement of facilities, this should be retained.Step-down care - Experts consider that it is bad value for money for the government to sell NHS land for private house-building when such land, much of it co-located with hospitals, or in their vicinity could be used for “step-down” care to relieve acute beds. Residential units for NHS staff - Building co-located residential units for NHS staff mitigates many problems in a single sweep, e.g. staff located near to work will be housed locally in good quality housing allowing them time to rest rather than commute and would be a big selling point when recruiting NHS staff. Land swaps with other public-sector land - The Mayor should encourage the NHS not to dispose of land until it has been considered for other public uses by all local stakeholders.

No unsuitable developments on former NHS land near hospitals - If, at the end of this sequential test, there is a case for selling any NHS site into the private sector, then the Mayor should favour a planning policy that prevents any type of development that would be unsuitable near any hospital.

User: British Property Federation

Delivering the health and social care infrastructure necessary to enhance and ensure the wellbeing of Londoners is crucial in enabling the sustainable delivery of the required new homes, and commercial premises. We welcome the call for a closer working relationship between boroughs, Clinical Commissioning Groups (CCGs), and the NHS to ensure efficiency in the use of estates and facilities to provide an improved quality of care. Requirements for the aforementioned stakeholders to regularly assess the need for health and social care facilities locally and sub-regionally, we believe, will help to ensure that the required facilities are delivered in line with an ever-changing built environment and demographic and population pressures. Increased levels of engagement between boroughs, CCGs and the NHS will ensure a joined-up approach to the provision of such facilities. Applicants and developers will therefore feel more confident in the identified need, potential location, and deliverability of such facilities. We believe that collaboration between the public and private sectors will play an important role in the delivery of projects across all tenures in relation to retirement living, care homes, and housing-with-care.

We welcome the call for development proposals that seek to provide high quality new and enhanced facilities to be supported. We would ask the Mayor to extend this level of support to specialist older persons' housing and housing-with-care, by reconsidering the requirement for associated affordable housing contributions. There exists a significant undersupply of specialist older persons housing within London and the UK. The timely and amplified delivery of such housing can play an important role in reducing the strain on health and social care facilities particularly in terms of primary care and the burden on the NHS. Recently published research by the ILC-UK into *International Lessons for the Housing-with-Care Sector,* identifies a potential reduced cost to the NHS of £1115 per person per year[1]. It should also be noted, as explained above, that increased provision of specialist housing for older persons whether inclusive of care facilities or broader retirement living models can help alleviate the existing pressure on family housing stock that is occupied by those that wish to downsize.

We would draw the Mayor's attention to the recently published report produced by the Communities and Local Government Select Committee on *Housing for Older People**[2]**,* which calls for a national strategy for the provision of associated housing models. The report recommends that the complications of enabling housing for older people should be addressed through revisions to the NPPF and through consideration in the upcoming Green Paper on Social Care. We believe that such priority should also be promoted through the London Plan.

Whilst better integrated forward planning and collaboration between boroughs, CCGs and the NHS are greatly welcomed, some work remains to be done in addressing the current separation between commissioners and associated land ownership. The result of such separation is that the aspirations of the respective landowners is at times divergent from the desire for commissioners to drive commissioning intensions and subsequent good growth.

[1] International Longevity Centre (2018). Stronger Foundations: International Lessons for the Housing-with-Care Sector in the UK - https://goo.gl/2K4aWM

[2] Communities and Local Government Select Committee (2018). Housing for Older People - https://goo.gl/kbaHvx

User: Cecilia Andipas

I propose that the London Plan includes policy to restrict the sale/use of NHS land unless the following points are given proper consideration:
I am concerned at the damage that would be done to the NHS estate, and to the contribution of planning to London, if any sale of NHS land in London takes place before a strategic framework is in place that has been subject to meaningful public consultation.
there are several options that provide better value for money, and more public benefit, as well as housing gain, than a straight sale of NHS land.
When any NHS land is identified as not being in clinical use, the Mayor should encourage the NHS to adopt a sequential test to appraise the use options for the land.
Buildings currently in clinical use - The useful life of a healthcare building today is often as short as 30 years. Furthermore, clinical services change frequently, driving frequent internal reorganisation within buildings. Where there is a backlog of maintenance, it will be important in each case to consider, first, whether there is a business case for carrying out that maintenance. This must be compared with a business case for renovating, adapting or even replacing the building. Until these determinations are known, there can be no responsible decision to sell any NHS land that is available for this purpose.
Expansion, replacement, and new facilities - Where the NHS owns land that is convenient for expansion and replacement of facilities, this should be retained.
Step-down care - Experts consider that it is bad value for money for the government to sell NHS land for private house-building when such land, much of it co-located with hospitals, or in their vicinity could be used for “step-down” care to relieve acute beds.
Residential units for NHS staff - Building co-located residential units for NHS staff mitigates many problems in a single sweep, e.g. staff located near to work will be housed locally in good quality housing allowing them time to rest rather than commute and would be a big selling point when recruiting NHS staff.
Land swaps with other public-sector land - The Mayor should encourage the NHS not to dispose of land until it has been considered for other public uses by all local stakeholders.
No unsuitable developments on former NHS land near hospitals - If, at the end of this sequential test, there is a case for selling any NHS site into the private sector, then the Mayor should favour a planning policy that prevents any type of development that would be unsuitable near any hospital.

User: Moorfields Eye Hospital NHS Foundation Trust & UCT Institute of Opthalmology

Policy S2 Health and social care facilities states:

A Boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to:
1) identify and address local health and social care needs within Development Plans taking account of NHS Forward Planning documents and related commissioning and estate strategies, Joint Strategic Needs Assessments and Health and Wellbeing Strategies
2) understand the impact and implications of service transformation plans and new models of care on current and future health infrastructure provision in order to maximise health and care outcomes
3) regularly assess the need for health and social care facilities locally and sub-regionally, addressing borough and CCG cross-boundary issues
4) identify sites in Development Plans for future provision, particularly in areas with significant growth and/or under provision
5) identify opportunities to make better use of existing and proposed new infrastructure through integration, co-location or reconfiguration of services, and facilitate the release of surplus buildings and land for other uses.

B Development proposals that support the provision of high-quality new and enhanced facilities to meet identified need and new models of care should be supported.

C New facilities should be easily accessible by public transport, cycling and walking.

The supporting text sets out the following:

Development and regeneration proposals for an area provide an opportunity to re-think how land and buildings are used and whether there is a more optimal configuration or use of that land. Hospital reconfigurations are an example where more intensive and better use of a site can lead to a combination of improved facilities and the creation and release of surplus land for other priorities. The London Estates Board aims to improve the way surplus and underused NHS assets are identified and released, and provide a single forum for estate discussions in London, ensuring early involvement of London Government partners. Membership includes NHS partners, local Government, the GLA and national partners (central Government, NHS England, One Public Estate and the national NHS property companies).

We strongly welcome and support this policy. We are encouraged by the dLP's requirement that boroughs should work with the NHS and that boroughs should take account of NHS Five Year Forward View, regional strategic health policy documents and the STP. The relocation of Moorfields and IoO is recognised throughout these documents and goes to the heart of the future of these two institutions.

We also strongly support the policy for release of buildings and land for other uses. While we have noted the City Road island site is not surplus, its release for other uses is crucial to the successful role Moorfields and IoO play in local, regional and national health provision and international research and learning.

We also welcome the support for high quality new and enhanced facilities such as those proposed at the preferred St Pancras hospital site. This is particularly relevant where public transport accessibility is so high.

Lastly, we also welcome the recognition of the London Estates Board and the role it can play in facilitating the swift re-use of assets, particularly those involved in this project at St Pancras Hospital and the City Road island site.

User:	Defend Enfield NHS

MAJOR CONCERNS

We acknowledge the London Plan's aspiration to create thousands of new homes. However, we consider that the concept put forward in the Chancellor's Autumn Statement of 2015, that a sell-off of NHS land[3] be carried out so as to release land for 26,000 homes, is simplistic and damaging, even if echoed uncritically in other quarters. There exist more nuanced opportunities for NHS land to deliver housing gain at the same time as providing health and welfare benefit to Londoners, and preserving the estate assets of the NHS.[4]

Failure to consider other reasonable alternatives

In the first place such sales would be irrational unless other reasonable alternatives to sale had been considered and compared. In our view, there are several options that provide better value for money, and more public benefit, as well as housing gain, than a straight sale of NHS land. We propose such alternatives, below.

The value of co-location

Since the London Plan is a spacial strategy, it is important that the value of co-location of NHS facilities and other health- and welfare-related uses is given due weight when considering the future uses and ownership of NHS land. Co-locating these uses on NHS land brings significant gains in functionality, efficiency, convenience, sustainability and value for money. Moreover, these gains are captured for the foreseeable future. This means that where there is the potential for co-location, NHS land carries a premium which would be lost upon a sale at market value: such land is of greater value to the NHS and to the public than it is to potential private purchasers for other, non-related uses.

PRIORITY USES FOR NHS LAND

Defend Enfield NHS therefore proposes that the following estate priorities should be promoted by the London Plan alongside the Mayor of London's role in the promotion of good health in London.

When any NHS land is identified as not being in clinical use,[5] the Mayor should encourage the NHS to adopt a sequential test to appraise the use options for the land. NHS land should be safeguarded from sale into the private sector unless and until it has been demonstrated that all the following potential uses, listed below in a suggested 6-step priority sequence, have been considered, and rejected for good reason.

(1) Buildings currently in clinical use
The useful life of a healthcare building today is often as short as 30 years. Furthermore, clinical services change frequently, driving frequent

internal reorganisation within buildings. Where there is a backlog of maintenance, it will be important in each case to consider, first, whether there is a business case for carrying out that maintenance. This must be compared with a business case for renovating, adapting or even replacing the building.[6] Until these determinations are known, there can be no responsible decision to sell any NHS land that is available for this purpose.

(2) Expansion, replacement, and new facilities
Where the NHS owns land that is convenient for expansion and replacement of facilities, this should be retained. Those who argue that efficiency will *reduce* the amount of estate required by the NHS are overlooking projected population increase and the ageing of the population. Furthermore, the ongoing specialisation[7] in medicine generates a need for additional specialist equipment and facilities. Moreover, it is far more efficient to preserve the co-location of health facilities by replacing them *on site* than by being forced to rebuild elsewhere.[8] Land in this category should be retained.

(3) Step-down care
Experts consider that it is bad value for money for the government to sell NHS land for private house-building when such land, much of it co-located with hospitals, or in their vicinity, could be used for “step-down” care to relieve acute beds.

The revenue benefit from this, over time, far outweighs the sale proceeds of the land … The government is saying ‘save money first, in order to invest,’ but the more realistic approach is to invest so as to save—a pump-priming argument.[9]

Land that is suitable for step-down care should be developed by the NHS urgently.

(4) Residential units for NHS staff
Building co-located residential units for NHS staff mitigates many problems in a single sweep.

• Housing: NHS staff, many of whom are on average to low pay, already form a significant proportion of those who are in housing need.

• Sleep: Many NHS staff work 12-hour shifts, which, according to recent sleep research, is a factor in reducing life expectancy.[10]

• Fatigue: By eliminating time spent travelling to work, co-located housing can mitigate the adverse effect of shift work, and reduce staff fatigue, thus increasing patient safety.

• Standard of living: Likewise, by eliminating travel expenses to work, resident NHS workers' standard of living can be improved.

• Recruitment: The availability of such accommodation can be expected significantly to reduce recruitment problems faced by the NHS. Whether this housing is "social", "affordable" or at market rents, it is clear that the NHS would be left in profit whichever of these terms of letting pertained. Moreover, the age profile of staff means that, today, more family housing is required, beyond the "nurses' hostels" of yesteryear.[11] This gives us the opportunity to impact the housing shortage significantly and in a targeted way that multiplies the benefits.

(5) Land swaps with other public-sector land
The Mayor should encourage the NHS not to dispose of land until it has been considered for other public uses by all local stakeholders.

The Mayor should encourage the NHS, the London local authorities and other public bodies to consider land swaps and/or purchases to improve their own estates and assemble required development sites, by securing more convenient sites from other public-sector holders of land.[12]

The Mayor should suggest a moratorium on all sales of NHS land until a clearing house is in place to prioritise the disposal of NHS land into the public sector before it is considered for sale into the private sector. This would ensure that, after NHS land has been considered for priority

NHS uses, it becomes available for supported housing for elderly and vulnerable people and social housing at genuinely affordable rents, provided by local authorities.

(6) No unsuitable developments on former NHS land near hospitals
If, at the end of this sequential test, there is a case for selling any NHS site into the private sector, then the Mayor should favour a planning policy that prevents any type of development that would be unsuitable near any nearby hospital, for example by causing disturbance to patients or congestion preventing access to ambulances.

When the public are being encouraged reluctantly to accept the sale of NHS land by the prospect of it being used to build necessary homes, it would be unacceptable if, later, the dwellings so created were unaffordable by many Londoners, or had fallen into the hands of Buy-To-Let landlords via the exercise of Right-to-Buy, or into the hands of international investors, to add to the current 20,000 long-term unoccupied homes in London.

Footnotes

[3]*NHS estates: Review of the evidence*, Wenzel et al, King's Fund, October 2016, p. 9. As to the future use of such land, the Autumn Statement posited that the sell-off would release land for 26,000 houses.

[4] We are aware that there are those who say that the sale of NHS land would benefit the NHS, by generating sale proceeds to fill the funding gap left by government underfunding of the health service. However, our research into the pattern of policies being applied to the NHS discloses a different relationship of causation, which is at least as likely, if not more so. NHS land is not up for sale to remedy underfunding. Rather, the causation is the other way around. The Government is underfunding the NHS to drive the sale and privatisation of NHS land, as part of its stealthy strategy to weaken, asset-strip, and gradually privatise, Britain's health system, and to make it difficult, if not impossible, for a future government to reinstate and develop the nationalised NHS. Furthermore, in the past four decades, about half of all land owned by public bodies has been privatised. This amounts to 2 million hectares, or 10% of the British land mass (Professor Brett Christophers, *The New Enclosure: The Appropriation of Public Land in Neoliberal Britain*, (2018), cite in *The Guardian*, 08/02/2018). Large-scale sales of NHS land are also consistent with this policy.

[5] Including uses ancillary to clinical use, such as administration, laboratories, kitchens, etc.

This determination will be different if the existing building is historic and/or listed.

[7] which is an aspect of the inevitable ongoing division of labour discussed by Adam Smith in the first three chapters of his *Wealth of Nations* (1776).

[8] For example, the North London Waste Authority is currently replacing its Edmonton incinerator with a new heat and power facility. The size of the Edmonton site permits the new build to proceed on the same site, without disturbing the ancillary facilities and route network of refuse trucks, etc. None of the available space is squandered, since it can be used for ancillary waste management activities such as composting, sorting and waste transfer.

[9] John Keyes, surveyor and estate expert at MTV Conference, The Kings Fund, 2017

[10] It is acknowledged that other workforces also work shifts, and that some NHS staff do not.

[11] Today the average age of a student nurse is 29, and the average age of a qualified nurse is 47 years.

12 There are other bodies, with whom we should engage, who are also interested in this issue, e.g. New Economics Foundation, http://neweconomics.org/2017/10/new-map-shows-public-land-sale-brings-people-together-save/

User:	The Royal Society for the Protection of Birds (RSPB)

The Government’s 25 year Environment Plan launched a new Natural Environment for Health and Wellbeing programme. We would like this to be championed within London’s strategies and access to natural environments should be at the heart of Health and Wellbeing Boards’ strategies. Boroughs should also work with Clinical Commissioning Groups (CCGs) to identify opportunities to utilise natural spaces to support people’s health, particularly through social prescribing hubs.

Also, in reviewing health and social care sites, consideration should be given to the valuable impact of green spaces and peoples’ engagement with nature on health and social outcomes. This could be considered in Equality and Health Impact Assessments

User: King’s College Hospital NHS Foundation Trust

Support of Social Infrastructure Policies

KCH are supportive of the social infrastructure policies outlined in Chapter 5 of the Draft London Plan. In particular, the following two policies are beneficial to not just KCH, but to the general long term development opportunities of healthcare in London:

- Draft Policy S1 – Developing London’s social infrastructure
- Draft Policy S2 – Health and social care facilities

London is home to some of the world’s most renowned health care facilities and it is imperative for regional policies to support their long term development potential to ensure London remains competitive in this field. It is in our view that draft policies S1 and S2 will support the delivery of high quality health care needs to Londoners and visitors alike.

User: New Policy Institute

Add at end of A3 and prioritise the reduction of inequalities in access to provision faced by low-income Londoners
Amend C to read:
New and existing facilities should be easily accessible by public transport, cycling and walking. Londoners should be able to access a GP within 15 minutes of travel.

Research into Acceptable Place Standards found strong agreement amongst participants that access to GPs within walking distance of homes was important. 15 minutes was favoured by many. The Plan notes that the NHS General Practice forward view supports the provision of primary care at greater scale. Whilst this may be the best model for patient care, it will mean that accessibility via public transport will need to be carefully considered.
Cycling may not be the best mode of transport for the groups of people who access the GP most frequently and have disability and health issues.

User: Silvertown Homes

Policy S2 Health and Social Care Facilities begins ‘Boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to…’ The supporting text to Policy S2 again focuses on health care provision by public bodies only.

The supporting text to Policy S2 should explicitly recognise that healthcare is also provided by the private sector. This includes healthcare provided to patients referred by the NHS. The healthcare sector more generally is a significant employer of Londoners and makes a significant economic contribution toLondon. Synergies with London’s universities, research groups and public sector healthcare provision together make healthcare one of the economic sectors where London is a global leader. This is acknowledged by the Mayor of London’s MedCity project which is referred to in Policy E8.

In this context, explicitly supporting healthcare provision from the private as well as public sector will help maintain and enhance London’s performance in this sector. This point is relevant because it is important that Planning Officers and decision-makers are advised on the significant arguments in favour of supporting private as well as public healthcare provision.

User:	Vital OKR

Policy SC regarding health and social care and Policy S3 regarding education and childcare facilities say good things about the relationship to where people are, and to public transport, but this should be explicitly linked to high street settings as incorporated within the town centre network. To achieve good growth there should be encouragement for the location of health and education provision in high street settings.

User:	London Borough of Newham

Policy S2 Health and social care facilities

LBN are supportive of this policy which is complementary to Newham’s Draft Revised Local Plan

User:	London Borough of Sutton

SUPPORT WITH CONDITIONS. The London Borough of Sutton supports Policy S2 - Health and social care facilities as it aligns with policies in the council's recently adopted Local Plan.
The council works closely with partners, including the Clinical Commissioning Group, the Royal Marsden NHS Foundation Trust and the Epsom and St Helier University Hospitals NHS Trust to ensure suitable health infrastructure is in place to meet current and future needs. The council considers that the plan should make clear that where the release of surplus buildings and land are proposed under Policy S2 A5), use for other forms of social infrastructure would need to be addressed before other alternative uses are considered.

User: CFGN Community Food Growers Network

We support the development of Community Food Hubs in the Social Infrastructure Chapter S2?

Boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to:

1. **identify and address local health and social care needs within Development Plans taking account of NHS Forward Planning documents and related commissioning and estate strategies, Joint Strategic Needs Assessments and Health and Wellbeing Strategies**

2. **understand the impact and implications of service transformation plans and new models of care on current and future health infrastructure provision in order to maximise health and care outcomes**

3. **regularly assess the need for health and social care facilities locally and sub- regionally, addressing borough and CCG cross-boundary issues**

4. **identify sites in Development Plans for future provision, particularly in areas with significant growth and/or under provision. These will include a better relationship between food provision and public access to sites for food growing which has been shown to support and enhance community public health statistics and overall well-being.**

5.

identify opportunities to make better use of existing and proposed new infrastructure through integration, co-location or reconfiguration of services, and facilitate the release of surplus buildings and land for other uses, including for community access to green and brownfield sites for food growing and the development of community food hubs with multiple benefits for town centres and the suburbs.

Development proposals that support the provision of high-quality new and enhanced facilities to meet identified need and new models of care should be supported. Some of which can offer public health routes to new care models which promote community self-reliance

New facilities should be easily accessible by public transport, cycling and walking.

5.2.1

London's health care services are vital to maintaining and improving Londoners' quality of life. The health service is also one of the capital's major employers, with over 200,000 people working in the NHS in London. Several factors affect the demand for health services and facilities. These include a growing and ageing population, an increase in complex and long-term health conditions that need an integrated approach, and changes in patients' personal preferences. New treatments and technologies are also transforming the ability to predict, diagnose and treat conditions. Studies on dietary intake, levels of access to green space and accessible and affordable exercise have also been shown to have an impact of public health and well-being and so should be factored in when making choices in land use and in social prescribing to promote community self-reliance and agency in determining resilience and well-being.

5.2.2

The NHS Five Year Forward View identifies the need to prevent avoidable illness and transform the way that care is organised and delivered in order to meet increasing demands for healthcare within the resources available. It describes the following priorities:

- **supporting and enabling individuals to take better care of their own health and the health of their families and communities**
- **undertaking a higher proportion of healthcare in community rather than hospital settings**
- **making best use of available assets, including more flexible approaches to how facilities are used and the overall configuration of the health estate, which requires a mix of dis-investment in older, out-of-date facilities and re-investment in more modern, fit for purpose estate**
- **ensuring that models of care change and continuously evolve**
- **ensuring that existing and planned new health infrastructure supports and facilitates change.**

5.2.3

There are currently four broad types of health infrastructure provision:

-

primary care – GP practices, plus community pharmacists, dentists and opticians

- community healthcare – this covers a wide range of diagnostic and healthcare services, including non-acute mental health services, which provide a means of delivering care closer to home than from a hospital setting, which excludes a range of preventative options available based upon attention to diet, exercise and access to green space and spaces for social interaction.
- acute provision
- specialist provision

5.2.4

Sustainability and Transformation Plans (STPs) were produced by the NHS and local Government in 2016 to set out how local health and care services would evolve and become sustainable by 2020/21. Five sub-regional STPs were developed in London. These five-year plans set out in varying levels of detail the proposed changes to NHS hospital estates and primary care facilities in each area.

5.2.5

Whilst there is no one-size-fits-all model of care, and an increasing blurring of the boundaries between primary, secondary (acute) and tertiary (specialist) health services, there are some broad underlying principles that underpin the planning of new facilities or changes to existing facilities. The NHS General Practice Forward View supports the provision of primary care at greater scale, with larger practices and/or more joined up networks of GPs offering a wider range of services to patients, including extended opening hours. This means fewer GP practices serving larger patient catchments (perhaps 10-20,000 people per practice) and operating from larger premises than is the norm at present. Models of community healthcare are based around larger population catchments (50,000 or more people) or localities to ensure individual services are viable, and to maximise the benefits of integrating and/or co-locating services in community healthcare centres or hubs of all kinds including food hubs, or in more flexible ways across localities or networks of service providers.

5.2.6

In assessing the need for new health and social care facilities, consideration should be given to the location, scale and timing of new residential development, and the quality, capacity and accessibility of existing health and social care facilities to meet some or all of the growth. Joint Strategic Needs Assessments produced by local Health and Wellbeing Boards describe the current and future health and wellbeing needs of the local population and identify priorities for action which are set out in more detail in the Boards' Health and Wellbeing Strategies. These documents are valuable sources of evidence to inform the development and review of Development Plans. Other forms of evidence are the numerous reports produced by public health and community garden facilities, often in conjunction with specialist bodies which prove and support the link between access to healthy food and accessible exercise and green space for leisure and social interaction and improved health and well-being outcomes.[1]

5.2.7

Where population growth and change is taking place at fairly modest levels, it may be possible to accommodate this through a combination of efficiency savings, service reconfiguration and small adjustments in capacity, for example, through the conversion of non-clinical space to consulting or treatment rooms. In areas of high or concentrated population growth, particularly in Opportunity Areas, it is more likely that new primary and community facilities or capacity will need to be provided. Boroughs have a key role to play in ensuring that the need for health and social care facilities is assessed, that sufficient and appropriately-located sites are allocated for such facilities, and that mechanisms are in place to secure their provision through, for example, Section 106 or Community Infrastructure Levy contributions. Design plays an increasingly significant role in how communities can access healthy spaces and health food as well as engage in more social interaction and so support health promoting behaviour.

5.2.8

The co-location of facilities with other uses, such as other forms of social infrastructure or housing, is encouraged to use land more efficiently and to enable a more integrated service delivery. This is in line with promoting development of lifetime neighbourhoods in which communities can live, work and interact socially in ways which minimise the need to travel long distances by car and encourage greater social cohesion and integrated living spaces. A community hub is centred upon the attainment of well-being through a range of social and cultural factors, central to which is how we access our food.

Food production hubs can play a useful role within the city. These are light- industrial, integrated, co-located developments which involve food growing, local food processing and market/distribution outlets which provide alternative, local food systems and which provide jobs and ‘green outlets’ and a sense of self- determined local futures.

Imported foodstuffs can be sourced via regional wholesale centres or directly sourced from sustainable food linkages and can be processed in these food hubs. They can provide social spaces as well as job and training opportunities which are connected to a range of cultural understandings of what a lifetime neighbourhood means in practice. If designed into plans for town centres or high streets they can:

1.

Encourage the start-up of SME community based food hubs

2. **Work in partnership with schools and colleges to encourage food based businesses by offering training skills in food growing, marketing and distribution as well as environmental management, managing food-waste, and addressing food poverty**

3. **Provide a variety of skills to encourage localised, self-reliant development within each borough, and also facilitate advantageous cross borough connections which can benefit London as a whole and households across each region.**

4. **Develop strategic partnerships between public health initiatives, community food hubs and social prescribing to optimise benefit to local communities in terms of well-being, reduced social isolation, improved mental health and social enterprise.**

5.2.9

Development and regeneration proposals for an area provide an opportunity to re-think how land and buildings are used and whether there is a more optimal configuration or use of that land. Hospital reconfigurations are an example where more intensive and better use of a site can lead to a combination of improved facilities and the creation and release of surplus land for other priorities. The London Estates Board aims to improve the way surplus and underused NHS assets are identified and released, and provide a single forum for estate discussions in London, ensuring early involvement of London Government partners. Membership includes NHS partners, local Government, the GLA and national partners (central Government, NHS England, One Public Estate and the national NHS property companies). Rethinking of the use of public health facility space also provides the opportunity to incorporate health promoting activities such as community food growing and open and accessible exercise facilities which also support social integration and mental health.

User:	CFGN Community Food Growers Network

Overall it appears that the role of food growing in terms of the health benefits, wider social and environmental benefits is not fully appreciated or integrated into the draft New London Plan despite the strong evidence on this topic and the Mayor of London’s commitment to a refreshed London Food Board and London Food Strategy.

User: Ms Deirdre Woods

7: FOOD HUBS

Food production hubs can play a useful role within the city. These might be integrated light industrial developments which involve food growing, local food processing and markets based upon these which provide alternative food systems not subject to the whims of large industry. Food hubs can act as a distribution point for small-scale agroecological producers, provide opportunities for SMEs and start-ups, provide good food for all, act as community centres, and provide education, training and jobs. Even imported foodstuffs obtained from regional wholesale centres can be processed in these food hubs. Food hubs can provide social spaces as well as job opportunities which are connected to a range of cultural understandings of what a lifetime neighbourhood means in practice.

The promise of community food hubs has been highlighted in reports such as “Community Food Hubs: Helping make Edinburgh a Sustainable Food City” by The University of Edinburgh and “Good planning for good food: How the planning system in England can support healthy and sustainable food” by Sustain. Food hubs are being promoted in other cities. It is vital that these initiatives are supported through the planning system in London.

In relation to E9.B:

We suggest the addition of a 10th pt:

In Development Plans, boroughs must 10) support the establishment and continued existence of community food hubs as sites which combine spaces for the growing, preparation and eating of healthy foods in an inclusive environment alongside distribution points for small-scale agroecological community produced food.

I feel this needs designing into the sections on health and social care facilties (S2), education and childcare facilities (S3), sports and recreation facilities (S5) and suggest the following policies:

In development plans and in planning decisions, boroughs must:

1. Encourage the start-up of food hubs which are located in Town Centres which work in partnership with schools and colleges to encourage food based businesses by offering training skills in food growing, marketing and distribution as well as environmental management, managing food waste, and addressing food poverty, providing a variety of skills to encourage localised, self-reliant development within each borough, but also facilitating advantageous cross borough connections which can benefit London as a whole and households across each region.

2. Develop strategic partnerships between public health initiatives, community food hubs and social prescribing to optimise benefit to local communities in terms of well-being, improved mental health and social enterprise.

User:	North London Waste Authority

NLWA supports Policy S2A 5) and paragraph 5.2.8 for the co-location of facilities and integration of services and facilities to increase the utilisation of buildings. Whilst Policy S2 is about the co-locations of health and social care facilities we suggest that this might also include temporary uses or release of space for community social enterprises in the circular economy. There may also be opportunities to make better use of existing infrastructure through shared use, for example if local schools have workshops that are not used at the weekends, might there be a way to provide a community reuse project with these facilities over the weekend? The capital's infrastructure is significant, but it may be possible to enable better utilisation of what is already in place in support of the sustainability goals within the NLP.

User: Footwork Architects Limited

Principle 1
Social needs must be identified and addressed as a prerequisite to development

Description:

Whether creating a new neighbourhood, or regenerating an existing one, to transform the built environment alone will not provide for social needs. There must be a thorough understanding of social context and existing problems, then specific steps identified to address them. Until these social factors are tackled, built environment professionals cannot create the physical conditions to help a community thrive. It is essential to avoid repeating the mistakes of the past and to learn from what has worked, through developing and implementing mechanisms for the measurement of success.

Assessment:
Methodology is already in place to assess local social needs:

- *Index for Multiple Deprivation* (the generally accepted measure)
- *Joint Strategic Needs Assessment* and *Joint Health and Wellbeing Strategies* (see Marmot
- Report and the Social Care Act 2012 – aimed at reducing health and social inequalities)
- *Healthwatch* (for local anecdotal data)

Application:

- Each borough to provide a **Social Needs Assessment** within their *Development Plan* and *Local Plan*, referred to within the *Core Strategy* and detailed as a Supplementary Planning Document, which must be kept updated
- This requirement could be inserted at Policy D2 of the Draft New London Plan, by dividing item ‘A’ into two parts. New ‘A’ to be an evaluation of socio-economic and well-being factors, heritage/ character and social infrastructure (currently points 1, 7 and 11); and new ‘B’ an evaluation of the data relating to physical and environmental factors (all the remaining points)

- Local authorities, Clinical Commissioning Groups and other service providers to take steps to address existing social needs, identified in the Social Needs Assessment and against agreed benchmarks, as a pre-requisite for designating *Opportunity Areas*, *Local Areas for Regeneration* and *Strategic Areas of Regeneration*
- *Supplementary Planning Guidance* (SPG) to be prepared (perhaps combined with the SPG on Social Infrastructure currently being reviewed - see below). This must be referenced in all strategic and major development proposals, with the inclusion of a Social Needs Assessment and a strategy for how identified local social needs and well-being are to be taken into account
- *Design Review Panels* to consider strategies to address social needs and well-being as an agreed component of the quality of a design. This must also to form part of the Mayor's planned Guidance on Design Reviews
- *Post-occupancy Surveys* (RIBA Plan of Work Stage 7) to become a contractual obligation for all major housing developments, at 1 year and 5 years after full occupancy. This will be an invaluable reference point for Development Plans and should be obligatory

[Policy GG2: 1.3.1, 1.3.2
Policy GG3: A, D
SD9: 2.10.2, 2.10.1, 2.10.3, 2.10.4; 2.10.5
Policy D2: A
Policy H13: 4.14.1
Policy S2: A: 1; 5.2.7, 5.2.8]

User: Dagenham Dock Limited

Draft Policy S2 – Health and social care facilities

DDL wish to express the same concerns to Draft Policy S2 as noted above to Draft Policy S1 below:

DDL welcomes the Mayor's objective to secure greater provision of social infrastructure across London; particularly Draft Policy S1C which offers support for development proposals which provide high quality, inclusive social infrastructure that addresses a local or strategic need – for example school provision. It is however crucial that the provision of such infrastructure, which often incurs significant costs to the developer either via the provision of land or S106 contribution, is recognised within the development proposal's financial viability appraisal and the impact that this is likely to have on scheme viability and affordable housing. At present the requirements and aspirations of Draft Policy S1 do not directly correlate with the threshold approaches proposed in Draft Policy H6 – please refer to specific text in relation to this policy below.

User: Alzheimer's Society

The focus on integration in policy **S2** is good to see. Alzheimer's Society strongly believes that it is only by fully integrating health and social care, and the voluntary sector, that dementia care will be improved. Poor arrangements for access to hospital outpatient services can cause people with dementia distress and worsen their condition. This research has found examples of people with dementia being forced to make long, uncomfortable and distressing journeys, then wait for delayed appointments[1]. Siting health and social care facilities close together in an easily accessible location can only help people with dementia.

[1] Alzheimer's Society, Fix Dementia Care: NHS and Care Homes, 2016

User: Alzheimer's Society

1. Paragraph **5.2.5** makes explicit what has been apparent for some time, that GP surgeries are beginning to work to larger catchment areas. So long as transport, including public transport links, are maintained then this is not inherently bad. However, we know that there are already many barriers to overcome when seeking a dementia diagnosis- including the stigma that many still feel about the condition- we do not want access to a GP to become another barrier to diagnosis which will end up increasing the health inequalities in London.
2. These larger catchment areas will inevitably lead to each surgery covering a more demographically diverse community. We know that there is still a significant stigma around dementia in some communities. Recently Alzheimer's Society conducted a large piece of research with universities in Bristol to look into this in more detail and produce resources to help GPs explain dementia in a culturally sensitive manner[1].

[1] http://www.bristolhealthpartners.org.uk/uploads/documents/2017-02-23/1487859789-dementia-needs-of-people-from-bme-communities-in-bristol.pdf

User: United Colleges Group (UCG)

Social Infrastructure and Co-Location
The Group also wishes to specifically identify support for Draft Policy S1 which allows for the co-location of social uses (including rationalisation and sharing of facilities) and the promotion of locally led regeneration through Opportunity Area Planning Frameworks, Area Action Plans, Neighbourhood Plans or master plans.

The co-location of social and community facilities S1. is strongly supported. The Group does however support the co-location of social and community functions with other uses such as residential and commercial development and this should be made stronger. Whilst this approach is set out in supporting text at 5.2.8 it should be incorporated in to policy wording. Such an approach would enable the development of active communities and ensure that developments are busy and thriving places to live, work and learn at all hours of the day.

User:	London Borough of Ealing

The Council supports this policy but laments the difficulties in planning for future needs and requirements given the reduction in resources for health and concerns about whether needs are being truly met.

User: Enfield Southgate CLP

We acknowledge the London Plan's aspiration to create thousands of new homes. However, we consider that the concept put forward in the Chancellor's Autumn Statement of 2015, that a sell-off of NHS land3 be carried out so as to release land for 26,000 homes, is simplistic and damaging, even if echoed uncritically in other quarters. There exist more nuanced opportunities for NHS land to deliver housing gain at the same time as providing health and welfare benefit to Londoners, and preserving the estate assets of the NHS.

Failure to consider other reasonable alternatives
In the first place such sales would be irrational unless other reasonable alternatives to sale had been considered and compared. In our view, there are several options that provide better value for money, and more public benefit, as well as housing gain, than a straight sale of NHS land. We propose such alternatives, below.

The value of co-location
Since the London Plan is a spacial strategy, it is important that the value of co-location of NHS facilities and other health- and welfare-related uses is given due weight when considering the future uses and ownership of NHS land. Co-locating these uses on NHS land brings significant gains in functionality, efficiency, convenience, sustainability and value for money. Moreover, these gains are captured for the foreseeable future. This means that where there is the potential for co-location, NHS land carries a premium which would be lost upon a sale at market value: such land is of greater value to the NHS and to the public than it is to potential private purchasers for other, non-related uses.

PRIORITY USES FOR NHS LAND

Enfield Southgate CLP therefore proposes that the following estate priorities should be promoted by the London Plan alongside the Mayor of London's role in the promotion of good health in London.

When any NHS land is identified as not being in clinical use,4 the Mayor should encourage the NHS to adopt a sequential test to appraise the use options for the land. NHS land should be safeguarded from sale into the private sector unless and until it has been demonstrated that all the following potential uses, listed below in a suggested 6-step priority sequence, have been considered, and rejected for good reason.

(1) Buildings currently in clinical use
The useful life of a healthcare building today is often as short as 30 years. Furthermore, clinical services change frequently, driving frequent internal reorganisation within buildings. Where there is a backlog of maintenance, it will be important in each case to consider, first, whether there is a business case for carrying out that maintenance. This must be compared with a business case for renovating, adapting or even replacing the building.5 Until these determinations are known, there can be no responsible decision to sell any NHS land that is available for this purpose.

(2) Expansion, replacement, and new facilities
Where the NHS owns land that is convenient for expansion and replacement of facilities, this should be retained. Those who argue that efficiency will reduce the amount of estate required by the NHS are overlooking projected population increase and the ageing of the population. Furthermore, the ongoing specialisation6 in medicine generates a need for additional specialist equipment and facilities. Moreover, it is far more efficient to preserve the co-location of health facilities by replacing them on site than by being forced to rebuild elsewhere.7 Land in this category should be retained.

(3) Step-down care
Experts consider that it is bad value for money for the government to sell NHS land for private house-building when such land, much of it co-located with hospitals, or in their vicinity, could be used for “step-down” care to relieve acute beds.
The revenue benefit from this, over time, far outweighs the sale proceeds of the land … The government is saying ‘save money first, in order to invest,’ but the more realistic approach is to invest so as to save—a pump-priming argument.8
Land that is suitable for step-down care should be developed by the NHS urgently.

(4) Residential units for NHS staff Building co-located residential units for NHS staff mitigates many problems in a single sweep.
• Housing: NHS staff, many of whom are on average to low pay, already form a significant proportion of those who are in housing need.
• Sleep: Many NHS staff work 12-hour shifts, which, according to recent sleep research, is a factor in reducing life expectancy.9
• Fatigue: By eliminating time spent travelling to work, co-located housing can mitigate the adverse effect of shift work, and reduce staff fatigue, thus increasing patient safety.
• Standard of living: Likewise, by eliminating travel expenses to work, resident NHS workers' standard of living can be improved.
• Recruitment: The availability of such accommodation can be expected significantly to reduce recruitment problems faced by the NHS.
Whether this housing is "social", "affordable" or at market rents, it is clear that the NHS would be left in profit whichever of these terms of letting pertained. Moreover, the age profile of staff means that, today, more family housing is required, beyond the "nurses' hostels" of yesteryear.10 This gives us the opportunity to impact the housing shortage significantly and in a targeted way that multiplies the benefits.

(5) Land swaps with other public-sector land The Mayor should encourage the NHS not to dispose of land until it has been considered for other public uses by all local stakeholders.

The Mayor should encourage the NHS, the London local authorities and other public bodies to consider land swaps and/or purchases to improve their own estates and assemble required development sites, by securing more convenient sites from other public-sector holders of land.11

The Mayor should suggest a moratorium on all sales of NHS land until a clearing house is in place to prioritise the disposal of NHS land into the public sector before it is considered for sale into the private sector. This would ensure that, after NHS land has been considered for priority NHS uses, it becomes available for supported housing for elderly and vulnerable people and social housing at genuinely affordable rents, provided by local authorities.

(6) No unsuitable developments on former NHS land near hospitals If, at the end of this sequential test, there is a case for selling any NHS site into the private sector, then the Mayor should favour a planning policy that prevents any type of development that would be unsuitable near any nearby hospital, for example by causing disturbance to patients or congestion preventing access to ambulances. Furthermore, what would be unacceptable would be for the public to be told that NHS land was to be developed into homes, only to find, later, that the dwellings so created were unaffordable by many Londoners, or had fallen into the hands of Buy-To-Let landlords via the exercise Right-to-Buy, or into the hands of international investors, to add to the current 20,000 long-term unoccupied homes in London.

User:	Natural England

The health and well-being benefits of green infrastructure could be better reflected within this policy. Integrating healthcare facilities with green infrastructure can enable use of greenspace for health walks, green gyms and quiet reflection.

We recommend:
- An addition to paragraph 5.2.8 to state that green infrastructure incorporated around healthcare facilities can enable uses which can support recovery.

User: CIBSE

We are broadly supportive of the objectives, but cannot comment in detail on individual objectives and measures as it is outside our core area of expertise.

We welcome the reference to Health and Wellbeing boards; we note however they are referred to in the context of identifying and responding to health and social care needs. It is our understanding that, as per the Health and Social Care Act 2012, these boards are intended to better support long-term healthcare and public health decisions. We have not carried out a systematic review however evidence indicates that the current typical set-up of health and wellbeing boards does not maximise opportunities: from anecdotal feedback and from a high-level and randomized review of the composition of these boards, it is apparent they typically do not include representatives from the planning and transport departments. Their composition implies a focus on healthcare provision, with limited attention to preventive approaches to public health, including how built environment and transport decisions can best support healthy lifestyles and environmental improvements.

We would recommend this is reviewed more systematically, and options considered to maximise the opportunities created by these health and wellbeing boards to encourage multi-disciplinary collaboration and inform decisions at a local level. This could facilitate decisions that impact, for example, on air quality and associated health and environmental issues, such as decisions on low-impact transport modes, the protection of accessible green space and the introduction of green and blue infrastructure.

User: Charith Gunawardena

I propose that the London Plan includes policy to restrict the sale/use of NHS land unless the following points are given proper consideration:

- I am concerned at the damage that would be done to the NHS estate, and to the contribution of planning to London, if any sale of NHS land in London takes place before a strategic framework is in place that has been subject to meaningful public consultation.
- there are several options that provide better value for money, and more public benefit, as well as housing gain, than a straight sale of NHS land.
- When any NHS land is identified as not being in clinical use, the Mayor should encourage the NHS to adopt a sequential test to appraise the use options for the land.
- **Buildings currently in clinical use -** The useful life of a healthcare building today is often as short as 30 years. Furthermore, clinical services change frequently, driving frequent internal reorganisation within buildings. Where there is a backlog of maintenance, it will be important in each case to consider, first, whether there is a business case for carrying out that maintenance. This must be compared with a business case for renovating, adapting or even replacing the building. Until these determinations are known, there can be no responsible decision to sell any NHS land that is available for this purpose.
- **Expansion, replacement, and new facilities -** Where the NHS owns land that is convenient for expansion and replacement of facilities, this should be retained.
- **Step-down care -** Experts consider that it is bad value for money for the government to sell NHS land for private house-building when such land, much of it co-located with hospitals, or in their vicinity could be used for “step-down” care to relieve acute beds.
- **Residential units for NHS staff -** Building co-located residential units for NHS staff mitigates many problems in a single sweep, e.g. staff located near to work will be housed locally in good quality housing allowing them time to rest rather than commute and would be a big selling point when recruiting NHS staff.
- **Land swaps with other public-sector land -** The Mayor should encourage the NHS not to dispose of land until it has been considered for other public uses by all local stakeholders.
- **No unsuitable developments on former NHS land near hospitals -** If, at the end of this sequential test, there is a case for selling any NHS site into the private sector, then the Mayor should favour a planning policy that prevents any type of development that would be unsuitable near any hospital.

User: National Health Services England, National Health Services Improvement, Community Health Partnerships.

Minor additions are also suggested to Policies S1 and S2 to ensure their strategic aims are met via specific recognition of the need for boroughs to support cross boundary re-provision through the planning process

Revisions to Policy S2

A. Boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to:

1. identify and address local health and social care needs within Development Plans taking account of NHS Forward Planning documents and related commissioning and estate strategies, Joint Strategic Needs Assessments and Health and Wellbeing Strategies

2. understand the impact and implications of service transformation plans and new models of care on current and future health infrastructure provision in order to maximise health and care outcomes

3. regularly assess the need for health and social care facilities locally and subregionally, addressing borough and CCG cross-boundary issues and offer full support for infrastructure re-provision across-boundaries through the planning process

4. identify sites in Development Plans for future provision, particularly in areas with significant growth and/or under provision

5. identify opportunities to make better use of existing and proposed new infrastructure through integration, co-location or reconfiguration of services, and facilitate the release of surplus buildings and land for other uses.

B. Development proposals that support the provision of high-quality new and enhanced facilities to meet identified need and new models of care should be supported.

C. New facilities should be easily accessible by public transport, cycling and walking.

User: South West London and St George's Mental Health NHS Trust

The Trust supports this policy and in particular its recognition that development proposals that support the provision of high-quality new and enhanced facilities to meet identified need and new models of care should be supported.

The Trust also supports paragraph 5.2.9 of the supporting text which states that:

“Development and regeneration proposals for an area provide an opportunity to re-think how land and buildings are used and whether there is a more optimal configuration or use of that land. Hospital reconfigurations are an example where more intensive and better use of a site can lead to a combination of improved facilities and the creation and release of surplus land for other priorities. The London Estates Board aims to improve the way surplus and underused NHS assets are identified and released, and provide a single forum for estate discussions in London, ensuring early involvement of London Government partners. Membership includes NHS partners, local Government, the GLA and national partners (central Government, NHS England, One Public Estate and the national NHS property companies).”

However, the Trust wishes to highlight that it is often the case that ‘surplus’ or ‘underused’ land must be used to fund necessary healthcare estate renewal programmes. As such, it is often the case that other policy demands such as affordable housing need to be balanced with the necessity of ensuring that essential services for Londoners have a sustainable future.

User: Hoarding UK

The plan seems inclusive on many levels, but we felt it important to highlight that there is no specific mention or plan in relation to managing the complex issue of hoarding behaviour.

Unlike other issues, hoarding cuts across all areas of statutory services. While it is now a recognised mental health disorder, there are few pathways in the UK for therapeutic treatment. In many cases it is recognised as causing a substantial risk to self and others. The Fire Brigade, Police, Emergency Services all, at times, engaging with this problem. Legal issues such as forced removals and threats to tenancy are still a daily occurrence. Environmental health are often powerless to provide appropriate support, instead having to engage in heavy handed intrusive acts. Housing struggling to ensure both the wellbeing of the person and those around them.

Despite the recognition as ‘self-neglect, including hoarding’ in the Care Act (2014), there are still no clear support programmes in place across London. In one local authority, three people had three completely different interventions. This in itself is discriminatory.

As you are undertaking this review, I felt it important to point out the omission of a clear, person-centred, pathway for people with hoarding behaviour and the professionals who serve them and would ask that you look at this prior to publication.

User: Redrow Homes London Division.

Policy S2 Health and Social Care Facilities begins ‘Boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to…’

The supporting text to Policy S2 again focuses on health care provision by public bodies only.

The supporting text to Policy S2 should explicitly recognise that healthcare is also provided by the private sector. This includes healthcare provided to patients referred by the NHS.

The healthcare sector more generally is a significant employer of Londoners and makes a significant economic contribution to London. Synergies with London’s universities, research groups and public sector healthcare provision together make healthcare one of the economic sectors where London is a global leader. This is acknowledged by the Mayor of London’s MedCity project which is referred to in Policy E8.

In this context, explicitly supporting healthcare provision from the private as well as public sector will help maintain and enhance London’s performance in this sector.

This point is relevant because it is important that Planning Officers and decision-makers are advised on the significant arguments in favour of supporting private as well as public healthcare provision.

User: YMCA

LONDON YMCA SOCIETAL WELL-BEING LAB

London to trailblaze a well-being lab that can informally test, experiment and prototype new social development institutions and activities for the well-being of London. Based on the Toronto-Google Sidewalk Labs partnership - with the focus on harnessing human capacity, rather than technology - using a YMCA existing space, combined with our in-house informal education insitution and research capacity, to provide an informal hub at the centre of a networked neighbourhood.

User: L&Q

Private sector health and social care facilities

Policy S2 Health and Social Care Facilities begins ‘Boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to…’ The supporting text to Policy S2 again focuses on health care provision by public bodies only.

The supporting text to Policy S2 should explicitly recognise that healthcare is also provided by the private sector. This includes healthcare provided to patients referred by the NHS. The healthcare sector more generally is a significant employer of Londoners and makes a significant economic contribution to London. Synergies with London’s universities, research groups and public sector healthcare provision together make healthcare one of the economic sectors where London is a global leader. This is acknowledged by the Mayor of London’s MedCity project which is referred to in Policy E8. In this context, explicitly supporting healthcare provision from the private as well as public sector will help maintain and enhance London’s performance in this sector. This point is relevant because it is important that Planning Officers and decision-makers are advised on the significant arguments in favour of supporting private as well as public healthcare provision.

User: Highams Park Planning Group

POLICY PCF2: Community Hubs:

Development should aim to contribute to public and community facilities in the Area and bring improvements to meet the needs of the growing population.

The community hubs listed below, together with their halls, other subsidiary buildings and grounds, are important community assets. Should development be proposed which affects any of the sites, there should be no reduction in the space available for community facilities and activities on the site.

i. All Saints' Church, Church Avenue.
ii. Highams Park Baptist Church, Cavendish Road.
iii. The former Highams Park United Reformed Church, Malvern Avenue.
iv. St Andrew's Church, 56 Chingford Lane
v. St Anne's Church, 200A Larkshall Road
vi. Winchester Road Methodist Church, Winchester Road
vii. Michael Mallinson Scout Facility, The Charter Road
viii. The Boat House at Highams Park Lake.
ix. Wingrove Hall, Beech Hall Road

User:	Highams Park Planning Group

POLICY PCF4: Public & Community Facilities - D1 Uses:

Development proposals which affect premises within the Plan Area currently in D1 use as a dental surgery, GP clinic, nursery or crèche may retain that use under any new proposals or convert to A1, A2 or A3, provided justification for the change of use can be provided and there is no unsubstituted or net loss of social, or health infrastructure within the Plan Area.

User:	Highams Park Planning Group

POLICY PCF5: Health & Education:

All residential development should make an appropriate contribution towards the expansion of health facilities and to increase the capacity of local schools and pre-school facilities.

User: Socialist Health Association London

S2 5.2.2. Excellence in healthcare depends as much on people's ability to access healthcare as it does on clinical excellence. However the Government's plans for health as set out in NHSE's 5YFV pay little or no attention to the need for local services. ('Care nearer home' simply means moving care out of hospitals and into community settings. It does not mean locally available services).

Current government proposals for NHS services involve a massive reduction in the number of local GP and NHS community sites (with proposed sell-off of this valuable NHS land), and involve development of much larger, but many fewer community sites. This will mean much longer journeys and greatly increased travelling times to access GPs and other community facilities which will make it extremely hard for many vulnerable elderly and disabled people, or those with young children, to access primary and community care services.

Government justifies this by talking about the need for community hubs that can deliver specialised services. We accept this. However the great majority of healthcare can be delivered appropriately and safely in local non-specialist settings. The real reason is that Government intends to underfund the NHS by £26bn per year by 2021 compared with 2015 funding levels, and cutting the number of healthcare sites is the main way they intend to achieve this reduction (as well as providing a one-off windfall through the sale of lucrative NHS buildings and sites). We cannot accept that patients will be expected to make long and inconvenient journeys in future. Local GPs and healthcare facilities must remain a very high priority.

User: Socialist Health Association London

S2 5.2.4

A major aim of the Government's Sustainability and Transformation Plans / Partnerships is to reduce the NHS budget by £26bn per year by 2021 compared with 2016 levels. A major way they intend to achieve this is through making a massive reduction in the number of local sites at which NHS care is provided. Plans set out in the Government's Naylor report involve proposed sale of £5.7bn of NHS property and sites (in part to fund revenue gaps and with profits from sale shared by private developers). The UK already spends far less on healthcare than comparable economies, and these proposals will massively degrade our NHS. The London Plan must stand out against this proposed destruction of the NHS in London and nationally. Whilst it cannot directly affect Government funding for the NHS, the Plan can highlight the destructive nature of Government proposals and encourage people to challenge these.

The proposed sell-off of NHS sites will result in people expected to make lengthy and very time-consuming journeys to access GPs and other community healthcare. This will be hard for everyone, but exceptionally difficult for those with small children, elderly people and disabled people - who are generally high users of GP and community healthcare services.

The London Plan and local plans must ensure than any proposals to change sites for healthcare take account of the impact this will have on journey times and access, particularly for the most vulnerable people.

User:	S Horne
Among the chapters, there is no mention of the NHS or hospitals, which are more needed than more housing.	

User: Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living

Policy S2 (204) -Health and Social Care Facilities

DLP should ensure that linkages are made to the provision of retirement housing which can help make considerable savings to the public purse and in particular savings to the NHS. The Select Committee Report in its recommendations and under the heading “The Link Between Housing and Health” advises:

There is a well-evidenced link between housing and health and wellbeing, and the consequent costs of treatment by the health service. Poor quality, un-adapted, hazardous, poorly heated and insulated accommodation can lead to reduced mobility, depression, chronic and acute illness and falls and social isolation to loneliness and depression. We recommend that prevention, early intervention and promotion of health and wellbeing through housing should be a priority for the national advice service. It should refer people to where they can get practical help to improve the quality of their home and to their local authority and health service if more immediate, direct intervention is needed.

The right kind of housing can keep people healthy, support them to live independently and reduce the need for home care or residential care. The Social Care Green Paper, planned for publication in summer 2018, must consider the range of housing for older people, from mainstream and accessible homes to supported and extra care housing, as well as access to adaptations and repairs. In particular, the Social Care Green Paper should consider the role of Extra Care housing in the provision of social care alongside domiciliary and residential care.

Without the right physical and mental support in place for older people, there is likely to be increased pressure placed on the health service and adult social care due to an increase in slips, trips and falls as people age in accommodation no longer suitable for their changing needs. A study by the Homes and Communities Agency found for a typical person aged 60 and above, moving to a suitable retirement development generates health and social care savings of £3,500 a year due directly to the benefits of ***this*** *form of housing.*[5]

There are therefore considerable linkages between the provision of housing for older people and health and social care facilities, which the Mayor should focus more closely on in the formulation of policies within the DLP. The Plan ought to be revised to reflect this, in order to encourage the provision of more of the housing that is so clearly required to address the nation's pressing health needs.

Recommendation: We strongly support the DLP aim to plan for improvements in health and social care facilities. The contribution that Retirement Housing makes in this regard should however be highlighted in order to encourage the further delivery of such development.

[5] A study by the Government body the Homes and Communities Agency in 2010 found for a typical person aged 60 and above, moving to a suitable retirement development generates health and social care savings of £3,500 a year. Figures updated for inflation.

User: London Borough of Camden

This policy should state that rents for health and social care facilities in private developments should be provided at affordable levels. If this is not the case, the long term provision of these facilities in private developments cannot be guaranteed. Health and social care provision also needs to be factored into the balance of what should be delivered through planning obligations.

Camden supports the principle of colocation of health facilities, although it is important to be aware of the complexities of making this happen in practice because of the different funding and decision making structures/arrangements of different providers/organisations.

Criterion A - Boroughs should work with their CCGs to understand the implications of lease expiry on primary care premises leased from the commercial centre, as well as impacts on the primary care estate of retiring single-handed practices where the GP owns the premises.

Criterion A (5) - Welcome shared use of infrastructure assets, although this may be problematic in practice. For example, our experience has been that as the NHS reimburses GP practice rent, but it will not reimburse rent for other health uses, such as community healthcare, commissioned by the CCG. With GP practices unable to take on the risk associated with a lease, this is a significant barrier to sensible co-location of services.

User:	Tavistock and Portman NHS Foundation Trust

Draft Policy S2 – Health and Social Care Facilities

The Trust supports this policy and in particular its recognition that development proposals that support the provision of high-quality new and enhanced facilities to meet identified need and new models of care should be supported.

User:	Tavistock and Portman NHS Foundation Trust

The Trust also supports paragraph 5.2.9 of the supporting text which states that:

"Development and regeneration proposals for an area provide an opportunity to re-think how land and buildings are used and whether there is a more optimal configuration or use of that land. Hospital reconfigurations are an example where more intensive and better use of a site can lead to a combination of improved facilities and the creation and release of surplus land for other priorities. The London Estates Board aims to improve the way surplus and underused NHS assets are identified and released, and provide a single forum for estate discussions in London, ensuring early involvement of London Government partners. Membership includes NHS partners, local Government, the GLA and national partners (central Government, NHS England, One Public Estate and the national NHS property companies)."

However, the Trust wishes to highlight that it is often the case that 'surplus' or 'underused' land must be used to support necessary healthcare estate renewal programmes. As such, it is often the case that other policy demands such as affordable housing need to be balanced with the necessity of ensuring that essential services for Londoners have a sustainable future.

User:	Age UK London - a charity working with older Londoners

POLICY S2: HEALTH & SOCIAL CARE FACILITIES

PROPOSED POLICY AMENDMENT: ADD access to information services for local communities.

User:	Age UK London - a charity working with older Londoners

42. S2 LINK TO POLICY CHANGE Health advice service for local communities would complement other information and advice services (see S1E above) and together provide an essential strand of social infrastructure. Health advice services could be co-located with other social infrastructure buildings or with purpose built sheltered housing.

User:	Joy Brown

Policy S2 Health and social care facilities. If my own borough is undertaking discussions on these, they are not making anything public, hence the bad feeling about the level of development and what looks like a disregard of the concerns of existing residents (not just on their own account but for future residents).

User:	St Anne's Redevelopment Trust
We welcome the priority given to tackling health inequalities.	

User:	St Anne's Redevelopment Trust

We agree that combating health inequalities should be a major focus but we believe that there should be more detail on how the Plan proposes tackle mental health inequalities; the Plan focuses largely on physical health inequalities.

User: Women's Resource Centre

S2 – Health and social care facilities

The women's health sector is as rich as it is diverse and continues to operate on the front line, supporting some of the most marginalised and vulnerable women and girls in our society, significantly within VCS organisations run by and for women.

We know that women make up 52% of the population, that 90% of single parent families are headed by women; that women live for longer in poor health (except for homeless women who have shorter life expectancy – 43 years to homeless men – 47 years). In fact, they continue to be disproportionately affected on every characteristic of health inequality making it impossible to meaningfully achieve a Plan with 'good growth'.

S2/A5: Development proposals that support the provision of high-quality new and enhanced facilities to meet identified need and new models of care should be supported.

We welcome the opportunity to work with the GLA in identifying solutions to support better use of existing and proposed infrastructure. Particularly in identifying opportunities to develop proposals that support high-quality and enhanced facilities to meet need as well as supporting specialist models of care.

For example WRC has completed the feasibility process for a Women's Building in London which is not only financially self-sustainable but would provide London with a hub for women's leadership, provide safe spaces for women's organisations to grow and improve sustainability. And ultimately strengthen sector ability to collaboratively maximise its contribution to London's vision of "good growth".

User:	Brendan O'Brien

I am very concerned that the government seems determined to sell off NHS land in a rushed fashion without proper consideration of the best possible use of these assets and with little transparency or accountability to the public. It seems both potentially damaging to the NHS and indicating utter disregard for the wishes of the general public.

User:	Evelyn Ryan

If possible, the London Plan should include policies to restrict the sale/use of NHS land and I should be grateful if you would take the following points into consideration when preparing those policies:

User: Mama Ujuaje

Recommended wording:

A. Boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to:

1. identify and address local health and social care needs within Development Plans taking account of NHS Forward Planning documents and related commissioning and estate strategies, Joint Strategic Needs Assessments and Health and Wellbeing Strategies

2. understand the impact and implications of service transformation plans and new models of care on current and future health infrastructure provision in order to maximise health and care outcomes

3. regularly assess the need for health and social care facilities locally and sub- regionally, addressing borough and CCG cross-boundary issues

4. identify sites in Development Plans for future provision, particularly in areas with significant growth and/or under provision. These will include a better relationship between food provision and public access to sites for food growing which has been shown to support and enhance community public health statistics and overall well-being.

5. identify opportunities to make better use of existing and proposed new infrastructure through integration, co-location or reconfiguration of services, and facilitate the release of surplus buildings and land for other uses, including for community access to green and brownfield sites for food growing and the development of community food hubs with multiple benefits for town centres and the suburbs.

B. Development proposals that support the provision of high-quality new and enhanced facilities to meet identified need and new models of care should be supported. Some of which can offer public health routes to new care models which promote community self-reliance

C. New facilities should be easily accessible by public transport, cycling and walking.

5.2.1 London’s health care services are vital to maintaining and improving Londoners’ quality of life. The health service is also one of the capital’s major employers, with over 200,000[63] people working in the NHS in London. Several factors affect the demand for health services and facilities. These include a growing and ageing population, an increase in complex and long-term health conditions that need an integrated approach, and changes in patients’ personal preferences. New treatments and technologies are also transforming the ability to predict, diagnose and treat conditions. Studies on dietary intake, levels of access to green space and accessible and affordable exercise have also been shown to have an impact of public health and well-being and so should be factored in when making choices in land use and in social prescribing to promote community self-reliance and agency in determining resilience and well-being.

5.2.2 The NHS Five Year Forward View identifies the need to prevent avoidable illness and transform the way that care is organised and delivered in order to meet increasing demands for healthcare within the resources available. It describes the following priorities:

- supporting and enabling individuals to take better care of their own health and the health of their families and communities
- undertaking a higher proportion of healthcare in community rather than hospital settings
- making best use of available assets, including more flexible approaches to how facilities are used and the overall configuration of the health estate, which requires a mix of dis-investment in older, out-of-date facilities and re-investment in more modern, fit for purpose estate
- ensuring that models of care change and continuously evolve
- ensuring that existing and planned new health infrastructure supports and facilitates change.

5.2.3 There are currently four broad types of health infrastructure provision:

- primary care – GP practices, plus community pharmacists, dentists and opticians
- community healthcare – this covers a wide range of diagnostic and healthcare services, including non-acute mental health services, which provide a means of delivering care closer to home than from a hospital setting, which includes a range of preventative options available based upon attention to diet, exercise and access to green space and spaces for social interaction.
- acute provision
- specialist provision

5.2.4 Sustainability and Transformation Plans (STPs) were produced by the NHS and local Government in 2016 to set out how local health and care services would evolve and become sustainable by 2020/21. Five sub-regional STPs were developed in London. These five-year plans set out in varying levels of detail the proposed changes to NHS hospital estates and primary care facilities in each area.

5.2.5 Whilst there is no one-size-fits-all model of care, and an increasing blurring of the boundaries between primary, secondary (acute) and tertiary (specialist) health services, there are some broad underlying principles that underpin the planning of new facilities or changes to existing facilities. The NHS General Practice Forward View [64] supports the provision of primary care at greater scale, with larger practices and/or more joined up networks of GPs offering a wider range of services to patients, including extended opening hours. This means fewer GP practices serving larger patient catchments (perhaps 10-20,000 people per practice) and operating from larger premises than is the norm at present. Models of community healthcare are based around larger population catchments (50,000 or more people) or localities to ensure individual services are viable, and to maximise the benefits of integrating and/or co-locating services in community healthcare centres or hubs of all kinds including food hubs, or in more flexible ways across localities or networks of service providers.

5.2.6 In assessing the need for new health and social care facilities, consideration should be given to the location, scale and timing of new residential development, and the quality, capacity and accessibility of existing health and social care facilities to meet some or all of the growth. Joint Strategic Needs Assessments produced by local Health and Wellbeing Boards describe the current and future health and wellbeing needs of the local population and identify priorities for action which are set out in more detail in the Boards' Health and Wellbeing Strategies. These documents are valuable sources of evidence to inform the development and review of Development Plans. Other forms of evidence are the numerous reports produced by public health and community garden facilities, often in conjunction with specialist bodies which prove and support the link between access to healthy food and accessible exercise and green space for leisure and social interaction and improved health and well-being outcomes.

5.2.7 Where population growth and change is taking place at fairly modest levels, it may be possible to accommodate this through a combination of efficiency savings, service reconfiguration and small adjustments in capacity, for example, through the conversion of non-clinical space to consulting or treatment rooms. In areas of high or concentrated population growth, particularly in Opportunity Areas, it is more likely that new primary and community facilities or capacity will need to be provided. Boroughs have a key role to play in ensuring that the need for health and social care facilities is assessed, that sufficient and appropriately-located sites are allocated for such facilities, and that mechanisms are in place to secure their provision through, for example, Section 106 or Community Infrastructure Levy contributions. Design plays an increasingly significant role in how communities can access healthy spaces and health food as well as engage in more social interaction and so support health promoting behaviour.

5.2.8 The co-location of facilities with other uses, such as other forms of social infrastructure or housing, is encouraged to use land more efficiently and to enable a more integrated service delivery. This is in line with promoting development of lifetime neighbourhoods in which communities can live, work and interact socially in ways which minimise the need to travel long distances by car and encourage greater social cohesion and integrated living spaces. A community hub is centred upon the attainment of well-being through a range of social and cultural factors, central to which is how we access our food. Food production hubs can play a useful role within the city. These are light-industrial, integrated, co-located developments which involve food growing, local food processing and market/distribution outlets which provide alternative, local food systems and which provide jobs and ‘green outlets’ and a sense of self-determined local futures. Imported foodstuffs can be sourced via regional wholesale centres or directly sourced from sustainable food linkages and can be processed in these food hubs. They can provide social spaces as well as job and training opportunities which are connected to a range of cultural understandings of what a lifetime neighbourhood means in practice. If designed into plans for town centres or high streets they can:

1. Encourage the start-up of SME community based food hubs
2. Work in partnership with schools and colleges to encourage food based businesses by offering training skills in food growing, marketing and distribution as well as environmental management, managing food-waste, and addressing food poverty
3. Provide a variety of skills to encourage localised, self-reliant development within each borough, and also facilitate advantageous cross borough connections which can benefit London as a whole and households across each region.
4. Develop strategic partnerships between public health initiatives, community food hubs and social prescribing to optimise benefit to local communities in terms of well-being, reduced social isolation, improved mental health and social enterprise

5.2.9 Development and regeneration proposals for an area provide an opportunity to re-think how land and buildings are used and whether there is a more optimal configuration or use of that land. Hospital reconfigurations are an example where more intensive and better use of a site can lead to a combination of improved facilities and the creation and release of surplus land for other priorities. The London Estates Board aims to improve the way surplus and underused NHS assets are identified and released, and provide a single forum for estate discussions in London, ensuring early involvement of London Government partners. Membership includes NHS partners, local Government, the GLA and national partners (central Government, NHS England, One Public Estate and the national NHS property companies). Rethinking of the use of public health facility space also provides the opportunity to incorporate health promoting activities such as community food growing and open and accessible exercise facilities which also support social integration and mental health.

User: CFGN Community Food Growers Network

We support the development of Community Food Hubs in the Social Infrastructure Chapter S2?

Boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to:

1. **identify and address local health and social care needs within Development Plans taking account of NHS Forward Planning documents and related commissioning and estate strategies, Joint Strategic Needs Assessments and Health and Wellbeing Strategies**

2. **understand the impact and implications of service transformation plans and new models of care on current and future health infrastructure provision in order to maximise health and care outcomes**

3. **regularly assess the need for health and social care facilities locally and sub- regionally, addressing borough and CCG cross-boundary issues**

4. **identify sites in Development Plans for future provision, particularly in areas with significant growth and/or under provision. These will include a better relationship between food provision and public access to sites for food growing which has been shown to support and enhance community public health statistics and overall well-being.**

5.

identify opportunities to make better use of existing and proposed new infrastructure through integration, co-location or reconfiguration of services, and facilitate the release of surplus buildings and land for other uses, including for community access to green and brownfield sites for food growing and the development of community food hubs with multiple benefits for town centres and the suburbs.

Development proposals that support the provision of high-quality new and enhanced facilities to meet identified need and new models of care should be supported. Some of which can offer public health routes to new care models which promote community self-reliance

New facilities should be easily accessible by public transport, cycling and walking.

5.2.1

London's health care services are vital to maintaining and improving Londoners' quality of life. The health service is also one of the capital's major employers, with over 200,000 people working in the NHS in London. Several factors affect the demand for health services and facilities. These include a growing and ageing population, an increase in complex and long-term health conditions that need an integrated approach, and changes in patients' personal preferences. New treatments and technologies are also transforming the ability to predict, diagnose and treat conditions. Studies on dietary intake, levels of access to green space and accessible and affordable exercise have also been shown to have an impact of public health and well-being and so should be factored in when making choices in land use and in social prescribing to promote community self-reliance and agency in determining resilience and well-being.

5.2.2

The NHS Five Year Forward View identifies the need to prevent avoidable illness and transform the way that care is organised and delivered in order to meet increasing demands for healthcare within the resources available. It describes the following priorities:

- **supporting and enabling individuals to take better care of their own health and the health of their families and communities**
- **undertaking a higher proportion of healthcare in community rather than hospital settings**
- **making best use of available assets, including more flexible approaches to how facilities are used and the overall configuration of the health estate, which requires a mix of dis-investment in older, out-of-date facilities and re-investment in more modern, fit for purpose estate**
- **ensuring that models of care change and continuously evolve**
- **ensuring that existing and planned new health infrastructure supports and facilitates change.**

5.2.3

There are currently four broad types of health infrastructure provision:

- **primary care – GP practices, plus community pharmacists, dentists and opticians**
-

community healthcare – this covers a wide range of diagnostic and healthcare services, including non-acute mental health services, which provide a means of delivering care closer to home than from a hospital setting, which excludes a range of preventative options available based upon attention to diet, exercise and access to green space and spaces for social interaction.

- acute provision
- specialist provision

5.2.4

Sustainability and Transformation Plans (STPs) were produced by the NHS and local Government in 2016 to set out how local health and care services would evolve and become sustainable by 2020/21. Five sub-regional STPs were developed in London. These five-year plans set out in varying levels of detail the proposed changes to NHS hospital estates and primary care facilities in each area.

5.2.5

Whilst there is no one-size-fits-all model of care, and an increasing blurring of the boundaries between primary, secondary (acute) and tertiary (specialist) health services, there are some broad underlying principles that underpin the planning of new facilities or changes to existing facilities. The NHS General Practice Forward View supports the provision of primary care at greater scale, with larger practices and/or more joined up networks of GPs offering a wider range of services to patients, including extended opening hours. This means fewer GP practices serving larger patient catchments (perhaps 10-20,000 people per practice) and operating from larger premises than is the norm at present. Models of community healthcare are based around larger population catchments (50,000 or more people) or localities to ensure individual services are viable, and to maximise the benefits of integrating and/or co-locating services in community healthcare centres or hubs of all kinds including food hubs, or in more flexible ways across localities or networks of service providers.

5.2.6

In assessing the need for new health and social care facilities, consideration should be given to the location, scale and timing of new residential development, and the quality, capacity and accessibility of existing health and social care facilities to meet some or all of the growth. Joint Strategic Needs Assessments produced by local Health and Wellbeing Boards describe the current and future health and wellbeing needs of the local population and identify priorities for action which are set out in more detail in the Boards' Health and Wellbeing Strategies. These documents are valuable sources of evidence to inform the development and review of Development Plans. Other forms of evidence are the numerous reports produced by public health and community garden facilities, often in conjunction with specialist bodies which prove and support the link between access to healthy food and accessible exercise and green space for leisure and social interaction and improved health and well-being outcomes.[1]

5.2.7

Where population growth and change is taking place at fairly modest levels, it may be possible to accommodate this through a combination of efficiency savings, service reconfiguration and small adjustments in capacity, for example, through the conversion of non-clinical space to consulting or treatment rooms. In areas of high or concentrated population growth, particularly in Opportunity Areas, it is more likely that new primary and community facilities or capacity will need to be provided. Boroughs have a key role to play in ensuring that the need for health and social care facilities is assessed, that sufficient and appropriately-located sites are allocated for such facilities, and that mechanisms are in place to secure their provision through, for example, Section 106 or Community Infrastructure Levy contributions. Design plays an increasingly significant role in how communities can access healthy spaces and health food as well as engage in more social interaction and so support health promoting behaviour.

5.2.8

The co-location of facilities with other uses, such as other forms of social infrastructure or housing, is encouraged to use land more efficiently and to enable a more integrated service delivery. This is in line with promoting development of lifetime neighbourhoods in which communities can live, work and interact socially in ways which minimise the need to travel long distances by car and encourage greater social cohesion and integrated living spaces. A community hub is centred upon the attainment of well-being through a range of social and cultural factors, central to which is how we access our food.

Food production hubs can play a useful role within the city. These are light- industrial, integrated, co-located developments which involve food growing, local food processing and market/distribution outlets which provide alternative, local food systems and which provide jobs and ‘green outlets’ and a sense of self- determined local futures.

Imported foodstuffs can be sourced via regional wholesale centres or directly sourced from sustainable food linkages and can be processed in these food hubs. They can provide social spaces as well as job and training opportunities which are connected to a range of cultural understandings of what a lifetime neighbourhood means in practice. If designed into plans for town centres or high streets they can:

1. **Encourage the start-up of SME community based food hubs**

2. **Work in partnership with schools and colleges to encourage food based businesses by offering training skills in food growing, marketing and distribution as well as environmental management, managing food-waste, and addressing food poverty**

3. **Provide a variety of skills to encourage localised, self-reliant development within each borough, and also facilitate advantageous cross borough connections which can benefit London as a whole and households across each region.**

4. **Develop strategic partnerships between public health initiatives, community food hubs and social prescribing to optimise benefit to local communities in terms of well-being, reduced social isolation, improved mental health and social enterprise.**

5.2.9

Development and regeneration proposals for an area provide an opportunity to re-think how land and buildings are used and whether there is a more optimal configuration or use of that land. Hospital reconfigurations are an example where more intensive and better use of a site can lead to a combination of improved facilities and the creation and release of surplus land for other priorities. The London Estates Board aims to improve the way surplus and underused NHS assets are identified and released, and provide a single forum for estate discussions in London, ensuring early involvement of London Government partners. Membership includes NHS partners, local Government, the GLA and national partners (central Government, NHS England, One Public Estate and the national NHS property companies). Rethinking of the use of public health facility space also provides the opportunity to incorporate health promoting activities such as community food growing and open and accessible exercise facilities which also support social integration and mental health.

Policy S3 Education and childcare facilities

User:	The Centre for Physical Education, Sport and Activity and Kingston University

Absolutely agree about the need for joined up thinking in planning/designing educational facilities that can serve the wider community especially when it comes to sport and leisure. However, our infrastucture in this field is managed by a plethora of providers from all sectors. Whilst, of course, there is plenty of room for everyone, we have too many cooks all with their own dishes to prepare! The problem with this is expertise is overlooked or by-passed. Planning for multiple users requires high level knoweldge about the needs of those users. When it comes to sport and leisure, very few facilities (if any) are designed with children's/young poeple's needs in mind so kids experience sport and active leisure in facilities that are not user friendly and in the long run this can have a detrimental effect on retention. The other (more) significant factor is the quality of the coach/teacher/adult, in creating the right social and psychological environment. As Director of the Centre for Physical Education, Sport and Activity and KIngston University, we would be happy to work with the GLA on getting this right.

User: Mr Peter Eversden MBE

Policy S3 Education and childcare facilities lacks a restriction in the planning for schools.

Policy S3 B should have an additional item 4) as follows 'avoid encroachment on Metropolitan Open Land and other green spaces for the provision of schools. See Policy G3 Metropolitan Open Land.'

'

User:	Mr Christopher Waller

In addition, the Mayor should use planning enforcement and CPO powers against illegal faith schools with a view to bringing them into the state sector, or redeveloping the sites for housing, as these lead to poor educational outcomes compared with other Londoners, with resultant unemployment, and are a child welfare and health and safety risk.

User: Miss Olga Astaniotis

Women still bear the brunt of childcare, putting their careers on hold or not realising their entrepreneurial dreams because of their responsibilities.

A radical and inventive approach should be considered that also takes in to account the changng nature of jobs and employment. Self-employment or starting a business is an increasingly necessary and preferred option for women, whose entrepreneurial talents are not being realised. Workspace hubs should be an integral part of high streets and industrial areas, with good transport links and facilities, and crucially, with flexible creches and childcare facilities on-site.

These facilities should be positively encouraged and even subsidised so that we canreap the full economic benefit of women starting starting strong and successful businesses.

User:	Ms Sandra McLeod

Lobby and campaign for Education for sustainability to be included in ALL schools in the capital/greater London area.

User: Mr Max Millington

The Borough of Richmond is fully aware of the need for more school places and has opened a new centrally located secondary school in the past year. In Mortlake and East Sheen it has expanded three primary schools from 2FE to 3FE and supported development of a new primary school, albeit poorly located alongside a level crossing in Sheen Lane. And it has negotiated - against the will of the significant majority of residents - inclusion of a new 6FE secondary school, plus sixth form, on the Brewery site in order to accommodate the extra pupils emerging in the primary schools (and to make up for its failure to make adequate provision in recent years).

However, the location of this large secondary school is entirely inappropriate and does not conform with your criteria of good public transport accessibility and access by walking and cycling. For instance, we envisage large numbers of secondary school pupils cycling across the level crossing in Sheen Lane where the barriers are down for upto 50 minutes during the peak hour including for periods of up to 14 minutes.

The Council reached this decision without taking due account of the factors you identify. If they had done, they would realise that a better location for this secondary school is at Barn Elms which enjoys good public transport access and meets your criteria of suitable, accessible outdoor space and next to parks and green spaces. The principal issue with the Barn Elms site, as I see it, is that it lies in the Tory heartlands and the Council is unwilling to upset its voters. In contrast, Mortlake is one of five identified areas of deprivation in the Borough. This decision must be re-visited: it is not in the interests of the community and was adopted, with a very light evidence base, in just 17 minutes.

I am concerned that, if the SHLAA study’s target of 811 new housing units per annum for the Borough of Richmond is unachievable, then this (or any) proposed new 6FE secondary school will never be filled and will become unviable. In these circumstances it would be more sensible to expand the two existing state secondary schools, both of which currently have places to spare.

It should also be noted that the Council's proposal to include a 6FE secondary school means the proposed 2FE primary school included in the proposal fo the site in 2011 and contained in a supplemental planning document, can no longer be built on the site. Even though there is a clear need, with local children around the site outside of all local catchment areas - as I can attest having been through the process this year - and with the proposed housing demographic of the site indicating greater take-up for primary school (or indeed pre-school) pupils than secondary school.

The policy should also provide for a full health impact assessment of situating schools in known or potential emissions (or other peril) hotspots. In the case mentioned above, the Stag Brewery borders an air quality management area, with levels frequently exceeding EU

maximum levels. Of all the places in the Borough where this is not an issue, it simply cannot be the case that the only place appropriate to put a school is in the middle of one of the most polluted areas.

User:	Mrs Holly Weir

The reference to ‘healthy routes to school’ is welcomed. Evidence shows that the distance and route to school are on the of the most significant factors in ensuring children travel actively.

User:	Mrs Holly Weir

To make this more achievable, amend fourth sentence to read ‘All children should be able to travel to school by walking, cycling or public transport *and the closer their home is to school the more likely they are to do this.*’ Evidence shows that distance from home to school is the most significant factor in whether or not a child will travel actively.

User:	Sport England

Please also see Sport England's guidance to promoting use of school sites for community use. This could be referenced in the supporting text. http://www.sportengland.org/facilities-planning/use-our-school/ The following text could also be added to the plan;

'Boroughs should work with Schools to secure community use agreements for their facilities. Sport England provides further guidance to schools on how to manage community use and template community use agreements; http://www.sportengland.org/facilities-planning/use-our-school/

http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/community-use-agreements/

User: Sport England

Sport England understands the need to locate new schools next to existing playing fields in London where there is a shortage of space. However, this can inadvertently result in the displacement or eventual loss of community teams as grass pitches which are used regularly by a number of schools and community sport can exceed the carrying capacity of a pitch, rendering it unplayable. This could be addressed though encouraging School providers to contribute towards improvements to the drainage or through other solutions such as artificial pitches (see comments on 5.5.7);

'Where new schools will use existing sports pitches or facilities, applicants should be encouraged to provide a contribution towards improving the affected facility to ensure it can support the additional use or consider innovative solutions to reduce the impact on existing open space. This could include artificial pitches or Multi-Use Games Areas on roofs or sunken sports halls where space is at a premium.'

For example, Chelsea Academy (LB Kensington & Chelsea) has a multi-use games area on its roof; http://www.chelsea-academy.org/key-information/facilities/

User: Alliance for Childhood

This is the report I mentioned at yesterday’s meeting regarding children’s rights under the UN convention:
www.coram.org.uk/sites/default/files/resource_files/Respected-protected%20lowres%20final.pdf

Here are some references to what makes a child friendly built environment:

This report is by Dinah Bornat. She has made a study of the criteria for building city spaces which support children and their activity. She is one of the Mayor's new Design Advocates.
www.zcdarchitects.co.uk/new-page

This is the fourth part of a presentation by Adrian Voce at the Child in the City conference at Goldsmiths in November 2017. There are links to the first three parts at the bottom of the article. www.childinthecity.org/2018/01/12/childrens-right-to-play-demands-a-national-strategy/?utm_source=newsletter&utm_medium=email&utm_campaign=Newsletter+week+2018-03

A second article by Adrian Voce. He is chairman of the European Network of Child Friendly Cities.
www.childinthecity.org/2018/01/17/10-features-of-the-playful-city/?utm_source=newsletter&utm_medium=email&utm_campaign=Newsletter+week+2018-03

This is a report by ARUP on creating child friendly city spaces:
www.arup.com/publications/research/section/cities-alive-designing-for-urban-childhoods

"The benefits of a child-friendly city go beyond children to add value to all citizens’ lives. The amount of time children spend playing outdoors, their ability to get around independently, and their level of contact with nature are strong indicators of how a city is performing, and not just for children but for all city dwellers. Perhaps uniquely, a child-friendly approach has the potential to unite a range of progressive agendas – including health and wellbeing, sustainability, resilience and safety – and to act as a catalyst for urban innovation."

Tim Gill wrote this report for the London Mayor:
www.londonsdc.org.uk/documents/Sowing%20the%20Seeds%20-%20Full%20Report.pdf

You’d find more on the Alliance for Childhood London website. www.allianceforchildhood.org.uk and Facebook page: www.facebook.com/AllianceforChildhoodInt/

I’m happy to discuss anything about this.

Marion

User: London Borough of Hammersmith and Fulham

Policy S3 (B) and 5.3.10

B Development proposals for education and childcare facilities should:

1) locate facilities in areas of identified need

2) locate facilities in accessible locations, with good public transport accessibility and access by walking and cycling

3) locate entrances and playgrounds away from busy roads, with traffic calming at entrances

4) link to existing footpath and cycle networks to create healthy routes to schools, and other education and childcare facilities, to encourage walking and cycling.

5) maximise the extended or multiple use of educational facilities for community or recreational use, through appropriate design measures.

6) encourage the shared use of services between schools, colleges, universities, sports providers, and community facilities

7) ensure that new developments are accessible and inclusive for a range of users, including disabled people, by adopting an inclusive design approach.

8) ensure that facilities incorporate suitable, accessible outdoor space

9) locate facilities next to parks or green spaces, where possible

10) ensure that there is not a net loss of facilities, unless it can be demonstrated that there is no ongoing or future demand

Poor Air Quality has a major impact to the health of the most sensitive child receptors. The design of educational building in areas of poor air quality can minimise the exposure of users of the facilities to poor air quality.

Revised text for Point B (3):

Help prevent or mitigate the impacts of noise and poor air quality on the Classrooms, Playgrounds (and other external amenity areas), Entrances by ensuring they are orientated away from the main sources of poor air quality and noise e.g. busy roads.

User:	The Access Association
Policy S3 - welcome B7 ‘ensure that new developments are accessible and inclusive for a range of users, including disabled people, by adopting an inclusive design approach’. Welcome B8 ‘ensure that facilities incorporate suitable, accessible outdoor space’.	

User: London Forum of Amenity and Civic Societies

Policy S3 A needs to be cross-referenced to Policy D6 – to ensure that there is sufficient capacity locally to fill gaps and cater for growth

Policy S3 B should express the need to think local first – walk, cycle and then public transport – or distinguish more clearly between primary schools and childcare (local) and secondary schools (non-local) which need to be served by public transport.

Proposal: Rewrite S3 B 2) as 'locate facilities in accessible locations, with primary schools and child care with easy access by walking and cycling and secondary schools having good public transport accessibility.'

There also needs to be more proactive planning of primary and secondary schools rather than "crisis planning" which seems the predominant mode**.**

Policy S3 A 3) should have added after the word "schools" 'and in other locations,'

Policy S3 Education and childcare facilities lacks a restriction in the planning for schools. It should have in section B an additional item 4) as follows:

'avoid encroachment on Metropolitan Open Land and other green spaces for the provision of schools. See Policy G3 Metropolitan Open Land.'

Paragraph 5.3.4 should have added after the word "schools" 'and in other locations,'

That paragraph's use of the words "where appropriate" differ from Policy S3 A 3) which uses "need". The former is better.

User:	London Food LInk /Sustain
We suggest amended text to ensure that facilities incorporate suitable, accessible outdoor space, including for food growing.	

User:	London Food LInk /Sustain
Additional point suggested ‘ensure adequate provision of kitchen, dining, and food growing space, alongside widespread access to tap water in all new and existing educational facilities.’	

User:	London Food LInk /Sustain

We are pleased to see recognition of space for food growing within the design of education and childcare facilities. This section needs to be amended with inclusion of the following additional sentence: ‘design of education and childcare facilities also needs to ensure adequate provision of kitchen and dining space, alongside widespread access to tap water to support positive nutrition and hydration initiatives to improve children’s health and attainment.’

User:	Diocese of Southwark

Access to high quality education and training is an essential part of improving people's life changes and the Diocese of Southwark is committed to being part of London's provision of education through its church schools and its chaplains in FE colleges and universities.

User:	Centre for Accessible Environments

B.7 This is welcomed however there is no other detail/wording provided to underpin and encourage accessible and inclusive design, despite specific reference to SEN and SEND provision, innovative design solutions etc, nor reference to specific design guidance, good practice or relevant organisations etc. Changing Places provision should be encouraged.

User:	Trust for London

We welcome the explicit inclusion of school-age childcare in this section, as particularly relevant to allowing parents (primarily mothers) to gain and sustain paid employment. The London Child Poverty Commission, instigated by the first Mayor, found that low employment levels of 2nd earners was a significant factor in London having much higher levels of child poverty than the rest of the country. Affordable, accessible and quality childcare is critical to addressing this issue, as well as increased flexible employment.

User: Trust for London

We welcome the acknowledgement of the scale of what is required from boroughs by way of additional childcare places. We would add that it is important for boroughs to consider the provision of flexible childcare including unusual hours which is particularly relevant to London's changing employment patterns.

We would also like local authorities to consider whether they can support parents in developing childcare co-operatives. Trust for London is funding a pilot development of a parent-led childcare co-operative suitable for low-income parents, being developed by New Economics Foundation in partnership with Family & Childcare Trust and Peabody.

User:	Trust for London

We welcome the proposal to plan for childcare facilities within new developments. We would like to add that planners and developers should consider incorporating childcare facilities within change of use or upgrades of existing developments. Peabody Housing is offering NEF a space to develop the parent-led childcare co-operative mentioned in our comments on 5.3.3.

User:	Trust for London

We agree that further education is important and that planning for it crosses borough boundaries. We suggest that consideration of priority sites for FE provision addresses areas where there are relatively low levels of qualifications at age 19 and/or the adult population more generally (mapped by borough in our London's Poverty Profile at https://www.trustforlondon.org.uk/data/19-year-old-qualifications-borough/ and https://www.trustforlondon.org.uk/data/adult-qualifications-borough/)

User: London Assembly Green Party Group

It is very good to see the provision of childcare facilities as well as schools included in these policies, including the requirement in part A that local needs and potential sites should be included in local plans.

I am also happy to see that this new draft removes the previous Plan's support for free schools.

However, S3 B (8) should include more to ensure the educational value of green spaces, wildlife habitats and food growing is included in the requirements for outdoor space and facilities schools to which schools have access.

Proposed amendment to S3 (addition highlighted in bold):

S3 B (8) ensure that facilities incorporate suitable, accessible outdoor space**, which includes green areas and space for food growing and other suitable outdoor educational activities.**

User: National Resource Centre for Supplementary Education

The draft Plan does not mention the contribution of supplementary schools in the overall education of children. As such, the challenges they face are not addressed.

The contribution of supplementary schools in tackling under - achievement is well documented by varius reports and research. They play an important role in many other areas.

Supplementary schools suffer from lack of recognition, and like many other community sector organisations they suffer from lack of sustainable funding. However, unlike other organisations, there are very few funders they can go for grant aid.

The Mayor's Office can play an important role in tackling some of these challenges by:

- Facilitating co-ordination between supplementary schools, mainstream schools and other education agencies. Previously, supplementary schools were involved in high level meetings with DoE and mainstream schools by attending regular meetings facilitated by the GLA.

- Ensuring that supplementary schools have equitable access to Mayor's funding resources

- Generally involving supplementary schools in crucial discussions on social issues, e.g. tackling knife and other crime, youth facilities, tackling truancy, parental involvement in education and other important issues.

The organisation I work for, the National Resource Centre for Supplmentary Education (NRCSE) will be very keen to work together with the Mayor to help address the above issues.

Ertanch Hidayettin

Regional Development Manager (NRCSE)

www.supplementaryeducation.org.uk

356 Holloway Road, London N7 6PA

Tel: 020 7697 4053 mob: 07742245503

User: Trust for London

We welcome the recommendation for schools and college facilities to be designed with shared used in mind including childcare and community activities. Civil society organisations we fund report that availability of space for community activities is shrinking as well as costs rising. Therefore an emphasis on affordability within this is vital.

The design of appropriate facilities will depend on proper consultation including of local civil society organisations, who may also bring voices of people that are not usually heard.

User:	Arcadis LLP
In Policy 5.3.1, there needs to be some reference to the location of new education and training facilities at points of good accessibility.	

User: Arcadis LLP

5.3.10 and 5.3.11 are general statements that recognise the principle of good design and space standards in education provision. It is questionable whether this guidance should be included in strategic policy and may be better left for Boroughs to consider.

Childcare provision can often find it difficult to find suitable facilities and there is a long history of this land use taking space in buildings that were not designed for this purpose. There should be some recognition in the plan of the re-use of alternative facilities for childcare provision.

User: Arcadis LLP

5.3.10 and 5.3.11 are general statements that recognise the principle of good design and space standards in education provision. It is questionable whether this guidance should be included in strategic policy and may be better left for Boroughs to consider.

Childcare provision can often find it difficult to find suitable facilities and there is a long history of this land use taking space in buildings that were not designed for this purpose. There should be some recognition in the plan of the re-use of alternative facilities for childcare provision.

User:	Arcadis LLP

With scarce urban land the recognition in Policy 5.3.12 for the need for shared education facilities is welcome. It is our view that the future for education in London needs to embrace a wider mix of land uses and recognise the need of technology in the way services are provided and the plan should be more ambitious and provide greater detail in its position on this point. A link to air quality policies and the way education sites are designed to contribute to the health and wellbeing of young people should also be considered.

User:	Arcadis LLP

With scarce urban land the recognition in Policy 5.3.12 for the need for shared education facilities is welcome. It is our view that the future for education in London needs to embrace a wider mix of land uses and recognise the need of technology in the way services are provided and the plan should be more ambitious and provide greater detail in its position on this point. A link to air quality policies and the way education sites are designed to contribute to the health and wellbeing of young people should also be considered.

User: Ms Philippa Manasseh

There are currently no secondary schools in the area. The original idea was the new property owners would be too rich or too absent to need state schools. This may not be the case now if housing is provided for families. Therefore there is a good case for a secondary school. There is currently a Church of England primary school in Warwick Road which could either be extended or another school built. A school which could provide access for adult education or better still a purpose built college to help older residents retrain and provide access courses for younger adults , would best.

Sources

Johnson, Darren, AM, Letter 20 June 2013 to Boris Johnson

Save Earl’s Court Campaigners & Save Earl’s Court Supporters Club: Earl’s Court, Rescue,Recovery , Renaissance. (2017)

Earl’s Court Master Plan

User: London Borough of Hammersmith and Fulham

Policy S3 – Education and childcare facilities

Paragraph 5.3.12

The introduction of the last sentence at the very end of this paragraph: '*Education and childcare facilities could also be co-located with other uses such as housing and mixed-use developments at higher densities'* is not reflected within the policy wording itself and seems to have been dropped in. Without fuller explanation and qualification it is open to abuse and could help facilitate the net loss of potential social infrastructure via the redevelopment of school sites with housing and schools on a reduced site. This sentence should therefore be qualified to clearly establish the requirement that there should be no net loss of the education and childcare facilities.

User: Westway Trust

Westway Trust supports a network of fourteen supplementary schools in Kensington and Chelsea. The offer extra tuition for pupils aged between 5-19 years who also attend mainstream school. They meet in term-time after school and at weekends, and are run by community groups set up by parents throughout the Royal Borough of Kensington and Chelsea.

Supplementary schools often work with immigrant children and are taught in their mother tongue to help young people to increase their understanding, improve their grades and most importantly to build their confidence in learning. They offer formal revision or booster lessons in English, Maths and Science, as well as a range of other subjects not always taught in mainstream school.

The network that Westway Trust supports is one of the leading groups of supplementary schools in the country and has been called a ‘beacon of best practice’ by the Executive Director of the National Resource Centre for Supplementary School

In relation to Policy S3 ‘Education and childcare facilities’ of the New London Plan, previous extended schools programmes incentivised schools to open up their buildings out of school hours and we believe something similar needs to happen to support supplementary schools and other community organisations to access venues in order to provide much needed opportunities for young people. One of the major challenges facing supplementary schools in our network is finding suitable venues at an affordable price.

The Trust also runs a crèche and supports a local nursery and we believe local authorities should be encouraged to release land and public buildings to enable community nurseries to use them. These create jobs for local people that find it hard to access work due to their own childcare commitments as well as providing additional childcare places locally. Nurseries find it very difficult to access reasonable cost venues.

www.westway.org/learning

User: Alliance for Childhood

B. 4) link to existing footpath and cycle networks to create healthy routes to schools, and other education and childcare facilities, (omit - to encourage walking and cycling) **to enable all children to travel actively (walk, cycle, travel by public transport) to school.**

We strongly support children's active travel to and from school by creating healthy routes. We recommend the wording in bold to make it a stronger requirement and enable rather than encourage.

B. 10. ensure that there is not a net loss of facilities, unless it can be demonstrated, **following a dialogue with the users**, that there is no ongoing or future demand.

It is important to involve those people using the facilities in the decision over whether there is an ongoing or future demand, especially where possible including children and young people in the discussion. They have a knowledge which is fundamental to the decision making process.

User: Alliance for Childhood

For reasons given in my comments to B 10, the agreement of stakeholders is important for the success of the implementation of decisions. Therefore we propose adding the wording in bold:

5. 3. 12. School and college facilities - in particular sports, play, training and meeting facilities - should be capable of use by the wider community outside their main operating hours. They can provide venues for a range of community activities, including nurseries, children's centres, cultural, youth and sports activities. Designing schools and colleges with this shared use in mind, and ensuring they are safe for a range of uses, also allows for more adaptability around changing work and lifestyle patterns, and extended childcare and holiday provision. *Sharing of facilities such as sports pitches and multi-use games areas and locating schools next to parks and open spaces can also further encourage the shared use of space, where space on a school or college site is* **demonstrably** *limited* **following a negotiation with stakeholders to establish what they need.** Education and childcare facilities could also be co-located with other uses such as housing and mixed-use developments at higher densities.

User:	Royal Borough of Kensington and Chelsea

It is recommended that Policy S3 (B) and paragraph 5.3.10, is revised to reworded as follows:

B Development proposals for education and childcare facilities should:

1) locate facilities in areas of identified need

2) locate facilities in accessible locations, with food public transport accessibility and access by walking and cycling

3) locate entrances, *playgrounds and classrooms should be orientated away from busy roads, with traffic calming at entrances to help prevent or mitigate the impacts of noise and poor air quality.*

User: London Borough of Islington

Chapter

Social Infrastructure

Draft London Plan Policy

Policy S3 Education and Childcare Facilities

Islington Response

S3(A)(3) encourages nursery provision but this should not be limited to just primary schools and should include secondary schools too – the provision helps the staff as well as more generally ensuring nurseries are provided in accessible locations reducing the need to travel. Also the London Plan could encourage boroughs to consider supporting provision of health services in an early years setting, particularly co-location of health visitors, breastfeeding support and other community health support services.

S3(B)(8) and S3(B)(9) are strongly supported. Good quality parks and open spaces provide important opportunities for play and outdoor learning. Islington works in partnership with The Garden Classroom to support schools in accessing and making the best use of their outdoor learning resource.

User:	LFoSR - The London Federation of Sport and Recreation

Policy 5.3: Education and Childcare Facilities, point 10, refers to ensuring "that there is not a net loss of facilities, unless it can be demonstrated that there is no ongoing or future demand."

This is a positive reference, although not necessarily applicable to other facilities that cannot be defined as being "Education or Childcare Facilities". This is one of several references to "ongoing and future demand" in the Plan, which is positive as it recognises an assessment of the future, as well as current demand is required.

User: London Borough of Barnet

This suite of policies highlights the need for boroughs to undertake a needs assessment of social infrastructure and identify sites for future provision. New facilities should be easily accessible by public transport, cycling and walking. Proposals resulting in a loss of social infrastructure (includes health, provision, education, community and recreation) as well as green infrastructure in “areas of defined need” should be refused unless able to be re-provided. Also, that redundant social infrastructure to be considered for other social infrastructure types before any alternative development. Whilst supportive of the intent of these policies and investment in infrastructure, we would welcome more support from the Mayor in helping to deliver infrastructure.

We welcome Mayoral support for importance of ensuring suitable childcare provision and accessibility of play spaces by active travel as planning considerations. However, the new London Plan should recognise that detailed planning for social infrastructure is best achieved at Borough level so as to ensure proper account is taken of the different needs and priorities of individual communities and neighbourhoods. Public health intelligence can be used to identify the needs of communities as well as gaps in social infrastructure. Barnet’s new Local Plan will therefore consider local health intelligence when identifying priorities.

User:	London Assembly Planning Committee

Recommendations The Education Panel recommends that Policy S3 A2 be amended to include reference to special schools. The policy should read: ‘identify sites for future provision, including for special schools, through the Local Plan process, particularly in areas with significant planned growth and/or need’.
Other comments
6.10 The Health Committee strongly supports this policy.

User:	London Borough of Lambeth

Lambeth supports this policy and in particular:

- the emphasis on planning on the basis of identified need
- the location of school entrances and playgrounds away from busy roads where possible
- support for healthy routes to schools and for active travel to school (which could potentially be strengthened through the inclusion of a monitoring target)

User:	London Borough of Haringey
The Policy is supported	

User:	London Cycling Campaign

Add B 2):
and access by walking and ***high quality*** cycling routes

Add B 3):
at entrances, ***and restrictions on vehicle access at school drop off and pick up times***

Add B 4):
link to ***existing and planned*** footpath and ***high quality*** cycle networks to create …

We note statement at 5.3.10 p211" All children should be able to travel to
school by walking, cycling or public transport."

User: London Borough of Barking & Dagenham

With regard to policy S3 which focuses on education facilities, the Council supports the policy approach. The policy should go further to set out that education facilities should encourage the optimum use of land and where appropriate mix with other uses (such as residential or commercial). It should also promote the highest standards of design for education uses reflecting the fact that they are often at the heart of the communities they serve and often some of the first buildings built in major new developments and help set the tone for the development that follows.

We support S3, the proposal to link existing foot path and cycle networks to create healthy routes to schools, educational and childcare facilities. The benefits of active travel are important for all age groups therefore we would like to see this amended to add “play and recreation settings and community centres”

We would also like a call for local authorities to set ambitious targets for the proportion of children and young people undertaking active travel.

We would like this supported by a recommendation that Healthy Streets approach and encouragement of 20mph limits near these facilities be incorporated planning decisions.

User: London Borough of Lewisham

We support S3 and encourage healthy routes to schools and other childcare facilities. S3 aligns with our current strategies, including whole system obesity, air quality action plans and cycling strategy. For instance, locating entrances and playgrounds away from busy roads can increase active travel and reduce exposure to air. We are also working with Goldsmiths and LeSoCo to integrate higher and further education into regeneration and development opportunities.

Whilst we welcome policy S3 and the need to provide educational facilities to meet demand, some educational facilities are no longer in our control and we seek further guidance and support from the GLA on how we can deliver policy S3 at the local level.

Further consideration should also be given to:

- Strengthening S3 to enable all children to actively travel to school.

User: London Borough of Brent

The policy is supported. There does however perhaps need to be a greater focus on ensuring genuine availability by community groups to the facilities provided in educational establishments as heads / institutions have different approaches and S106s on ensuring accessibility have not always been followed willingly. Often whilst open in principle, other methods such as limited time slots and pricing mechanisms can be used by the institutions to make genuine public accessibility more difficult than it needs to be/ result in no community use.

Amend wording to:

B 5) maximise the extended or multiple use of educational facilities, including sports facilities associated with educational establishments, for community or recreational use, through appropriate design measures

User:	London Borough of Bromley

The Council is concerned that the policy fails to acknowledge the difficulty of finding sites for schools, particularly in a legislative environment where the Local Authority is no longer the provider of schools. The Council notes the site requirements in section B of the policy, but considers that these site specific requirements are most appropriately assessed by the Local Council who ultimately retain the duty to ensure the provision of places.

User: London Councils

The London Plan does not need to prescribe that local authorities should ‘identify and address local needs and any shortages in supply’, as they already do this as part of their statutory duty on places planning. It would be helpful to clarify this role in the Plan. However, the London boroughs support the proposal that they should work sub-regionally and across borough boundaries, where there is a shared need, and there are many current examples of boroughs coordinating in this way when planning places.

London Councils does not support the proposal that every borough should identify sites for future schools in their local plans. Some local authorities already do this but it may not be appropriate for all boroughs due to different priorities for land.

Competing pressures may also mean that local authorities may not want to prioritise education land for providing childcare on-site. London struggles with scarcity of adequate sites for schools; therefore some primary schools may not be able to fit a nursery class on to a small site. Equally, the new early years funding formula does not make it financially viable for some schools to create new nurseries on-site. Creating new childcare provision within schools should be encouraged where there is need, space and appropriate funding levels, but local authorities need the flexibility to determine what would be best for their local communities.

Local authorities do not have much influence over the development of new primary schools in the current system. The Education Skills Funding Agency (ESFA) approves new free schools, often purchasing land, and does not consult with local authorities consistently throughout this process. It would be helpful if the London Plan recognised this reality for the boroughs, as many of the policies set out in this section are more directly related to the ESFA’s role. This is particularly the case for the points in B relating to quality, as many boroughs have significant concerns about the quality of some new schools approved by the ESFA.

Locating education facilities in areas of need is one of London Councils’ central policy positions on school places planning and London Councils welcomes its inclusion in the draft Plan. Building new

schools in areas where there is no demand for places can destabilise the school system, making some schools financially unviable.

London Councils supports the proposals set out under B as a framework for developers to take into account when planning a new school, and to ensure that developers put quality at the forefront of new school developments. However, we would support the addition of a caveat that it may not be possible to meet each of these criteria in every case due to site and time restrictions.

London Councils believes that the following should be added to the list set out under B:

- Ensure that quality is built in to every new school development.
- Aim for all new secondary schools to be at least 6 Forms of Entry, where appropriate for the local context. Smaller schools risk compromising the curriculum offer and can make schools financially unviable.
- Design new provision to be as flexible as possible to accommodate different teaching methods and potential changes in demand for places.

It is helpful that the London Plan recognises the need for additional childcare and provision for Special Educational Needs and Disabilities (SEND) pupils, as this is where the London boroughs are now feeling significant additional pressure, as well as rising demand at secondary level in the majority of London boroughs. Some councils are still experiencing rising demand at primary level as well. It is important that the London Plan recognises this context.

The London Plan's data on need for school places is taken from 2015, and therefore does not reflect the current places challenge for the capital. London Councils' analysis from September 2017 from Do the Maths predicts that 63,710 places will be needed in London by 2022, which equates to 27,376 places at primary and 36,335 at secondary. We estimate that London will need the equivalent of 72 new secondary schools between 2017-2023.

It is important that the London Atlas be updated if it is to be a useful tool in terms of school places planning. The latest performance data on the site is from 2015.

User: London Borough of Tower Hamlets

Consideration should be given to the extensive use of public open spaces by schools and the resulting overuse. It should be made clear that proximity to parks does not compromise the requirement or provision of adequate play space on the school site.

New policies encourage nursery provision within primary schools, where there is a need, which is in line with our new Local Plan and therefore supported. In addition, nursery and other pre-school provision (places for 2 year olds) should also be encouraged within ground floor uses in a range of locations to increase provision.

It should also be noted that locating schools and nursery provision away from busy roads and next to parks are not necessarily the key drivers of school location. Whilst these are factors which do impact on the design of provision, the main driver must be local demand for provision, with primary schools within walking distance and secondary, ideally located to meet centres of demand but not so close to other existing provision that patterns of application are significantly adversely affected.

We endorse linking development proposals for education to existing footpath and cycle networks to create healthy routes to schools.

User:	Royal Borough of Kingston

General support. Clarification is sought on whether development for new school buildings is appropriate on school playing fields, as such locations may be the best option for the provision of extended educational facilities, including those needed to support growth.

User: London Borough of Hillingdon

The Council welcomes the support for new educational facilities which will assist in meeting the Borough's needs, but some requirements will not be practical
on all sites and may conflict with other policies.

Criterion B, part 3, seeks to locate entrances and playgrounds away from busy roads. The policy should seek to achieve this where possible. Where no
insurmountable highway objections exist, a balance needs to be struck between this and other site constraints (which often dictate layout, access, etc, particularly where expanding existing schools) and ensuring this does not encourage car use by locating entrances too far from public transport links, contrary to Criterion 2.

Parts 5 and 6 of criterion B encourage greater community use and sharing of facilities. Again, the policy should seek to achieve this where it is feasible and
practicable to do so, in compliance with other policies of this plan.

Although desirable, this continues to present challenges with Sport England SE). The extent to which this can be delivered varies significantly across sites. SE
takes an uncompromising view to delivery of community use and associated facilities (eg, floodlighting, hours of use, etc). Their unsympathetic approach to site
constraints and other policy requirements has proven problematic, increasing risk and delay (and costs) to the delivery of pupil places. A policy which is weighted too much in favour of community use over other policy considerations gives greater weight to SE's objections and could increase risk to future school developments.

Paragraph 5.3.12 seeks the co-location of education and housing facilities. Consideration has historically been given to the provision of housing above some of
LBH's primary schools. This has been strongly resisted in the past due to child safeguarding concerns. For smaller facilities such as crèches and nurseries this may be more feasible, but for schools the practicality of this would need to be very carefully considered. Furthermore, within Hillingdon at least, options for expansion and/or new schools are extremely limited. Therefore, notwithstanding housing need, it is important the educational use of sites is maximised to meet the need for pupil places. The provision of housing or other uses could restrict future

expansion of schools.

User: London Borough of Merton

Support with significant amendments The Policy is supported subject to inclusion of suggested amendments.

Part A3 states that "*Boroughs should… ensure that development proposals for housing and commercial facilities incorporate suitable childcare provision*" As almost every minor and major planning application in London is a development proposal for housing and/or commercial facilities, this policy is undeliverable without further detail. Our assumption is that this policy would apply to schemes that are referable to the Mayor of London (i.e. over 150 homes or 2,500sqm non residential floorspace, and not for a single dwelling or small shop however the justification for this policy is entirely silent on any aspect of its delivery,
simply repeating that "*childcare facilities … should be provided within new housing and commercial developments, where there is a need*" .
The choices and trends in childcare (e.g. looked after in own home by parents / in purpose built nursery / by childminder in their home / by grandparents / by parents sharing / by after-school club on school site / by after school club off site / by au pair or nanny) create such a range of potential parental choices and premises requirements that "*suitable childcare provision*" does not necessarily mean additional floorspace through the planning system. Additional floorspace will require a childcare provider to run it. We would strongly recommend that this policy is amended to state "*where there is an identified need that can viably be delivered*",
identify sites for future provision through the Local Plan process, particularly in areas with significant planned growth and/or need"

This policy requires clarification – is this referring to both education and childcare sites or
just education sites?

User:	London Borough of Merton

Part B10 "*ensure that there is not a net loss of facilities unless it can be demonstrated that there is no ongoing or future demand*". There are many residential properties in Merton that have been part converted by the owner to act as a childminder, usually looking after a small number of children on the ground floor while continuing to live on upper floors. When the owner wishes to cease childminding and simply continue with the property as their home, this policy would prevent the owner converting their ground floor back to residential if there was any "ongoing or future demand" for childcare in the area, regardless of whether the owner was willing to deliver it. The policy should be amended to refer to facilities of over a specific size, say 280sqm, and include *there is no ongoing or future viable demand*" in order to make the policy reasonably deliverable.

User:	London Borough of Hounslow

Policy S3 should place greater emphasis on school place planning over school facility planning to ensure need can be met through both expansions of existing facilities as well as the creation of new facilities; the policy should also make specific reference to travel management plans in development proposals for new educational and care facilities, in order to reflect the predominance of car travel due to much poorer public transport infrastructure in outer London especially radial linkages.

User:	London Borough of Hackney

Support the policy however Hackney would like to see a requirement for all new schools to sign up to TfL’s STARS programme as an effective tool for ensuring sustainable travel to school is prioritised and for embedding road safety into the school.

User: Westminster City Council

While the policy objectives are supported, it should be recognised that school place planning is susceptible to change over a plan period, and infrastructure delivery plans can be more easily adapted to changing circumstances than local plans. Furthermore, future provision will also in many cases be met through expansion and intensification, as much as identification of new sites. To clarify this, it is suggested that criterion A2 is reworded as follows:

"identify sites for future provision through the Local Plan process (including infrastructure delivery plans), particularly in areas with significant planned growth and/or need".

The detailed design of education and childcare facilities will depend on the circumstances of each case and it is questionable whether all the requirements in paragraph 5.3.10 can be met in every circumstance, particularly in places like Westminster where there are limited sites for such provision.

User:	Ministry of Housing, Communities & Local Government

London faces specific challenges on the number of available sites for new schools. We have some concern that your draft Plan, in restricting development opportunities beyond national policy, would not help tackle this. We would ask you to consider whether there are further flexibilities that could be introduced in London to facilitate delivering new schools in specific circumstances.

User:	London Borough of Southwark

The council recommends the policy encourages the sharing of school facilities (in particular sports facilities) with the wider community, which would benefit the wider community through increased opportunity for physical activity and social cohesion.

User:	London Borough of Wandsworth

The Council supports the policy as it provides continuity from the previous London Plan. Under Section B of the policy we would recommend that development proposals should consider flexibility in context of design to facilitate new models of care which may emerge over time.

User:	London Borough of Wandsworth

General concern about increase in housing population without a coherent strategy on increase in social infrastructure, including physical infrastructure particularly schools. Careful consideration should be given to assess whether such facilities should be located away from areas of high air pollution including busy roads. Air pollution has negative impacts on the health and wellbeing of children including lung development as well as onset of asthma. The Mayor cannot influence the Education and Skills Funding Agency’s decisions.

The Council supports the added level of criteria to take into consideration for education development proposals and the requirement for local authorities to consider demand, and plan for need.

User:	London Borough of Richmond Upon Thames

General concern about increase in housing population without a coherent strategy on increase in social infrastructure, including physical infrastructure particularly schools. Careful consideration should be given to assess whether such facilities should be located away from areas of high air pollution including busy roads. Air pollution has negative impacts on the health and wellbeing of children including lung development as well as onset of asthma. The Mayor cannot influence the Education and Skills Funding Agency’s decisions.

The Council supports the added level of criteria to take into consideration for education development proposals. Support the requirement for local authorities to consider demand, and plan for need.

User:	London Borough of Harrow
The overall intent of this Policy is supported.	

User: London Borough of Harrow

The Council however considers that this policy is overly prescriptive and needs to be more flexible in recognition that school place requirements can change quickly and that there are several stakeholders involved in the provision of school places.

For example, it may not be practical to locate childcare facilities as part of new primary school provision (as implied in the draft Policy) given space constraints on smaller sites. Some boroughs may only wish to identify broad locations for new school place provision in the Local Plan, rather than identifying specific sites. This is particularly the case at present, where local authorities do not have much influence over the development of new schools in the current system. The Education Skills Funding Agency (ESFA) approves new free schools, often purchasing land, and does not necessarily consult with local planning authorities consistently through this process. It would be helpful if the London Plan recognised this reality for the boroughs, as many of the policies set out in this section are more directly related to the ESFA's role. This is particularly the case for the points in B relating to quality, as many boroughs have significant concerns about the quality of some new schools approved by the ESFA.

User: London Borough of Harrow

Harrow supports the principle of locating education facilities in areas of need and welcomes its inclusion in the London Plan. Building new schools in areas where there is no demand for places can destabilise the school system, making some schools financially unviable.

Harrow supports the proposals set out under B as a framework for developers to take into account when

planning a new school and work proactively to encouraging developers to put quality at the forefront of new school developments. However, we would support the addition of a caveat that it may not be possible to meet each of these criteria in every case due to site and time restrictions.

The Council requests that two additional criteria should be included under (B):

- use a quality framework, such as CABE's 10 point plan, to ensure that quality is built in to every new school development.
- design new provision to be as flexible as possible to accommodate different teaching methods and potential changes in demand for places.

In relation to shared usage, there does however need to be a greater focus on ensuring genuine availability by community groups to the facilities provided in educational establishments as heads / institutions have different approaches and S106s on ensuring accessibility have not always been followed willingly. Often whilst open in principle, other methods such as limited time slots and pricing mechanisms can be used by the institutions to make genuine public accessibility more difficult than it needs to be / result in no community use. Schools are essentially profiting from being allowed to expand (often onto open space) where such an expansion has been justified in terms of increased community access but this increased access needs to be better secured / managed.

User:	Royal Borough of Greenwich

S3A: The principles outlined are supported. However, finding suitable sites in suitable locations can be particularly challenging, and the options for expanding schools are becoming more limited (as many schools have already been expanded). While sites for new schools are factored into planning frameworks for growth areas, the time lag between a site being identified and it being operational can be considerable. Together these factors could inhibit the council from providing sufficient school places where they are needed.

S3B: Support the introduction of criteria which development proposals for new education and childcare facilities should satisfy.

User: London Borough of Havering

Havering supports the policy in principle.

Criteria B

The criteria set out under (B) could be viewed as being an ideal framework to assist boroughs in creating new provision. There needs to be a balance that acknowledges that not all new schools will be able to meet the standards as set out and that in some instances necessary new schools should not be delayed if a site does not meet the criteria set out.

Paragraph 5.3.5

The draft London Plan refers to data from the Projected Demand for School Places (2015) from the GLA Intelligence Unit. This data is too old to be representative of London now.

The draft London Plan should take a balanced approach to land-uses. There is no mention regarding how boroughs will be able to identify land suitable for new school provision that would otherwise be prioritised for housing. It will be difficult for boroughs to secure land for new schools with so many different priorities for the limited land in London.

Furthermore, the focus in the draft London Plan on small sites being expected to deliver a significant proportion of new homes will reduce the likelihood that housing developments will facilitate to co-locating education provision to meet the demand in school places generated by the new housing.

Paragraph 5.3.6

The identification of the need to increase provision for Special Educational Needs and Disability is supported.

Paragraph 5.3.8

The draft London Plan should give greater consideration could be given to strengthening links with Higher Education particularly in those neighbourhoods with there is no tradition of Higher Education including in this borough.

This part of the draft London Plan should identify the need for developers to set aside part of a site in order to provide new school provision making clear that any developer giving up part of a site will not be making a financial tariff/S106 contribution for education purposes.

Havering notes that the Mayor of London is committed to the retention of the Green Belt. Notwithstanding this, in the light of difficulties in finding suitable sites for schools in the built up area, consideration could be given to the draft London Plan recognising the potential opportunity for educational use in the Green Belt in very special circumstances where it can be robustly demonstrated that there are no suitable alternative sites within the appropriate education planning area and there is a demonstrable need or demand for additional school places.

The draft London Plan does not refer to the need for provision for Looked After Children (LAC). The emphasis for LAC is both on local provision where appropriate and on provision out of area where CSE???? or issues like gang influence occur making it preferable to place out of the immediate location.

The draft London Plan should also recognise that support for children as they get closer to adulthood (such as semi-independent provision) is also an accommodation based issue. There should be reference to how these growing challenges are going to be met.=

The policy should acknowledge the importance of funding for education and the challenges and constraints linked to that.

User:	London Borough of Enfield

Policy S3 ‘Education and Childcare Facilities’ fails to realise the role of the ESFA. There is no mention that ‘Free Schools’ fall outside local authority control. Local Plans should identify sites to satisfy school places demand. There needs to be some sort of ‘London School Design Guidance’ that is specific to London in order to address issues such as air pollution. The policy does not reference parking standards and the need for pick up and drop off facilities, or build upon the healthy streets concept, or reference any standard for design and the provision of outdoor space. When housing results in the loss of previous educational land, S106 contributions should be sought from the resulting loss of school places.

User: TUC London, South East and East of England

Policy S3: Education and childcare facilities

1. Forward planning is critical to provide sufficient school places.
2. Presently, more school places are not provided in areas of identified need. A local borough cannot bring forwards proposals for a new school unless it agrees to open an Academy School. Free Schools have been opened in areas where there is not a demonstrable need for another school, leading to empty spaces in other local schools. It is very difficult for a planning framework to interface with a key element of social infrastructure like school based education when decision about it are made on the basis of ideology and not effective public policy. The return of an objective strategic authority for schools such as ILEA should be welcomed.

User: Inclusion London

Policy S3 Education and childcare facilities section

The Alliance of Inclusive Education's[1] submission to the Mayoral of London's Draft London Plan

There are 2,004,033 children with SEN across the capital,[2] who are at significant higher risk of being excluded and segregated than the general pupil/student population nationally including across the capital.[3] Therefore we want the Mayor of London to be proactive in upholding and promoting disabled pupils and students human rights to mainstream education under the UNCRPD Article 24 and support LAs duties around promoting presumption of mainstream education under Children and Families Act. The UNCRPD Committee recommended that the state (i.e. the Government, Greater London Authority and Local Councils) must work together to develop a policy framework for inclusive education that will promote disabled pupils and students rights to mainstream education under CRPD Article 24.[4] We therefore want the Mayor of London and GLA to do the following which reflects the spirit of UNCRPD committee:

- To only approve establishment of mainstream schools and colleges and universities that will develop and share good inclusive practice for disabled pupils and students with different impairments, health conditions and abilities.

- To only grant permission to build new mainstream schools that are inclusive of all.

- To bring together London Councils, LAs, Schools, Colleges and universities and Disabled People's Organisations to work together to identify barriers and solutions to promoting access to mainstream education provision across the capital for Disabled pupils and students.

- To share good inclusive education practice across

London education providers

There is no evidence that parents opt for segregated education. The only evidence is that parents are forced into placing their children in special schools as a result of many years of underfunding of mainstream schools to fulfil their statutory duties to promote presumption of mainstream education under the Children and Families Act.

Adult Education Budget Devolution

The Mayoral of London has responsibility for directing the shape and developing the London Skills Strategy (LSS) for how £400m will be spent of adult education and skills across the capital. We want the Mayoral of London to comply with their duties to promote inclusive practice in further and higher education and apprenticeships as outlined in CRPD Article 24.

Too often disabled students in further education have few options, often fewer than their peers attending mainstream schools and universities. For we found from a series of FOI requests during 2016, that most young people with learning difficulties are only funded to attend segregated courses for people with learning difficulties. Disabled students with learning difficulties are not participating in mainstream vocational and skill based courses. The Mayoral of London with £4million at his disposal can decide to change the life chances of disabled people, particularly those with Learning Difficulties by:

- Commissioning Colleges that will demonstrate and willingness to build their capacity to develop inclusive education practice across their mainstream courses.
- Provide colleges with ring-fenced funding for disabled students reasonable adjustments.
- Supporting the development and sharing of good inclusive education practice in education, training and apprenticeships.

[1] https://www.allfie.org.uk/

[2] DFE SEN statistical Analysis 2017

[3] Permanent and fixed-period exclusions in England: 2015 to 2016 DFE 2017

[4]http://docstore.ohchr.org/SelfServices/FilesHandler.ashx?enc=6QkG1d%2FPPRiCAqhKb7yhspCUnZhK1jU66fLQJyHIkqMIT3RDaLiqzhH8tVNxhro6

User: Just Space

Policy S3 Education and Childcare

As with health, the promotion of educational facilities is business driven and does not combat the issues of poverty and inequality. The contribution that supplementary schools make to increasing the self confidence of children from minority ethnic communities, grounding children in their heritage, tackling social ills and increasing the Black child's access to higher education should be recognised by the Mayor. Proposals could resolve some of the challenges they face (such as inadequate premises). The Mayor could enable their access to mainstream education establishments, politicians and the business community. There are linkages with policies E3 and E11.

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

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

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

User:	London Borough of Bexley

Part A of **Policy S3 Education and childcare facilities** sets out how local authorities can ensure a sufficient supply of education and childcare facilities. However, the policy and supporting text address a number of issues that are outside the purview of planning, including the quality of educational facilities. In terms of planning, the only real power available to London boroughs is to identify need and to identify land. Direct provision of new schools is not within the boroughs' power, and if new schools are needed then appropriate organisations must be willing to take action. Boroughs can use evidence about the need for new schools to encourage developers to provide new sites for schools, including by setting out the need for schools within a certain area through masterplans or other development frameworks. This is how the Council was able to secure the provision of a school as part of the ongoing Erith Quarry development.

User: Diocese of London

We endorse Policy S3 Education. The London Diocesan Board for Schools (LDBS) is part of the Diocese of London and champions education founded on the Christian faith and its values. Its existing 157 schools are open to those of all faiths and none. It has a responsibility for the leadership, support, growth and encouragement of each of these schools spread across 18 local authorities in the Diocese of London, north of the Thames. It cares for 55,000 students as well as many thousands of teachers and other members of staff working in those schools. The LDBS would be very keen to be involved in the delivery of new schools. With regard to section B6 of the policy, Development proposals for education and childcare facilities should ‘encourage the shared use of services between schools, colleges, universities, sports providers, and community facilities , faith groups/churches should be mentioned because schools might form the basis for new worshipping communities and a focus for a new community.

User: Kingston University

Policy S3 Education and childcare facilities
The University supports paragraph 5.3.8 that accompanies draft Policy S3 as this recognises the important role that universities have in terms of employment and education, noting the following:

*"**Higher education** in London provides an unparalleled choice of undergraduate and postgraduate degrees, continuing professional development, advanced research, and infrastructure to support business growth, such as incubation space and business support services. It is also a significant employer and attracts major international companies able to benefit from universities' research reputations, such as in pharmaceuticals and life sciences. Universities also play a vital part in ensuring Londoners have the higher order skills necessary to succeed in a changing economy, and for the capital to remain globally competitive. The Mayor has established a forum for higher education institutions and further education establishments to work with boroughs and other stakeholders to plan future developments, including student accommodation, in locations which are well-connected to public transport."*

Reflecting this supporting text, draft Policy S3 should be expanded to include a specific reference to the Mayor's support for the continued enhancement and improvement of existing further and higher education establishments. Such support should be confirmed in policy, given the international importance of London's universities and the need to continue to provide world class facilities.

User: London Healthier Places

The LHP Network especially welcomes the requirement for school entrances and play grounds to be located away from busy roads and the implementation of local traffic calming measures; the introduction of "healthy" routes to schools to encourage walking and cycling and the high quality of design required for new schools, including space for both indoor and outdoor learning space (including space for food growing). The LHP Network recommends that the London Plan Monitoring includes targets for the proportion of children who walk/cycle or get public transport to school.

We propose that Policy S3 part B4 be changed to "link to existing footpath and cycle networks to create healthy routes to schools, and other education and childcare facilities, to enable all children to travel actively (walk/cycle/travel by Public Transport) to school".

The LHP Network would like to see stronger promotion of opportunities to share school facilities (in particular sports facilities) with the wider community.

User: NHS England

Local authorities and clinical commissioning groups (CCGs) should be consulted, along with relevant user groups, especially if the schools will be providing in-reach healthcare. The improvement of schools should be intertwined with the work of STPs and special educational needs and disability (SEND) provision, to create a multi-agency partnership to support accessible and inclusive designs across the capital. Specifically, fully accessible bathroom facilities for those with special educational needs and disability should also be promoted within local authority and CCG areas. There is a lack of facilities for people who require them and this restricts and limits SEND access to the community. If schools are to be open for access this would be a great opportunity to get more of these toilet facilities in use. There is a lack of provision for children and young people on the autism spectrum, both within mainstream provision and especially a lack of specialist provision for autistic young people with behaviour that may challenge others. In designing space, both within mainstream and specialist provision, it is essential that there be adequate access to functional outdoor space to learn and play is essential. Extensive worldwide scientific research into the benefits of outdoor learning versus indoor learning for children with autism points to the many benefits of outdoor play and learning for all children in terms of health, wellbeing and overall learning and development. Research on the physical benefits of exposure to nature has highlighted that time spent outdoors can help fight attention deficit hyperactivity disorder (ADHD). Psychologists have linked contact with nature to restored attention, recovery from mental fatigue and enhanced mental focus.

The following inclusive design principles underpin projects:

- Access – simple, clear layouts
- Space – more space is often needed for mobility aids, small group work, personal care, storage etc.
- Sensory awareness – thinking about acoustics, visual contrast, use of colour, light, sound etc.
- Enhancing learning through designs that take into consideration furniture, fittings and equipment support and promote optimum communication
- Flexibility and adaptability – eg. movable partitions to create flexible space
- Health and well-being – eg. ventilation, specialist medical and therapy facilities, effective hygiene and infection control
- Safety and security – eg. zoning to reflect different functions, security
- Sustainability – eg. designing schools relevant to local situations and needs

User:	Ministry of Housing, Communities & Local Government

At policy S3 A2 it would be useful to reference that LPAs may introduce Local Plan policies which could help to deliver schools sites or additional capacity.

At Policy S3 B1, we consider that education demand should be referenced as well as need.

At Policy S3 B3 and B8, we consider that the provision of access away from main roads and of accessible play space should be “where possible”, to avoid the risk of refusing a much need educational development on matters which may not be able to be overcome.

The Mayor should consider the need to update the evidence base (within the GLA’s Social Infrastructure SPG and Schools Site Atlas) to help provide an accurate picture of the current position and anticipated need for schools across London.

User:	Ministry of Housing, Communities & Local Government
The DfE also published guidance for schools providing for Special Education Needs and Disability (SEND) and alternative provision. This is BB104 and should also be referenced in this paragraph. https://www.gov.uk/government/publications/send-and-alternative-provision-area-guidelines	

User: London School of Economics

We are encouraged that the draft plan recognises the potential higher education has in helping deliver a number of key objectives of the draft plan namely:

- Growing London’s economy;
- Developing London’s skills;
- Connecting education to business;
- Supporting regeneration;
- Addressing skills shortages; and
- Making a positive impact upon people's life chances to break down social inequalities.

Paragraph 5.3.1 in particular resonates with the key aims of the LSE and we support the clarification of the “ profound“, “vital“ and “critical“ contribution that higher education can make to London’s economic growth. Paragraph 5.3.8 accurately reflects that London critically needs the higher order skills that the LSE in particular equips its students with. We strive to ensure that they can succeed in a changing economy and in doing so allow London to be resilient in a globally competitive market.

We would support the general position of the draft Plan that higher education can have a clear role in regenerating and delivering growth in identified opportunity areas outside of Central London locations. We feel that the draft Plan needs to provide clarity that growth in such areas must not preclude improvements in established higher educational facilities in Central London areas. As we previously outlined, the LSE’s desire to maintain and provide world leading educational facilities, aligns strongly with the draft Plan's identified objectives. The LSE must work for London and internationally and its specialist student market and function is quite different to the many other excellent higher educational establishments that are more likely to expand within regeneration areas. This regeneration will occur without the expectation for centrally located higher educational establishments to expand or relocate outside their established locations. Whilst the LSE will obviously consider opportunities across London as a whole on their merits clearly there is a requirement for any policy to respect the historical and longstanding association of the school with

its current location and not to introduce requirements which would present significant obstacles to expansion of higher education facilities within Central London and put at risk the important positive contribution that the LSE makes to London as a global city.

User: Town and Country Planning Association

Policy S3 Education and childcare facilities

3.8.11 The TCPA supports Policy S3 and believes that the sustainability and quality of provision of premises which house young Londoners will help achieve the wider objectives of Good Growth. In particular the locations of these facilities in relation to active travel routes with sustainable transport options, and good access to quality open space for activities can ultimately help tackle childhood obesity rates and air quality issues prevalent in hotspots across London.

3.8.12 In order to strengthen the spatial relationship between an education facility and sustainable travel options, the TCPA recommends amending S3, B (4) “to enable improved active travel choices and increase physical activity opportunities”.

User: London Environment Directors' Network (LEDNet)

Policy S3 Education and childcare facilities

A **4) set ambitious targets for the proportion of children and young people travelling by walking, cycling or public transport for all or part of the journey to new primary and secondary schools.**

B Development proposals for education and childcare facilities should:

4) link to existing footpath and cycle networks to create healthy routes to schools, ~~and~~ other education and childcare facilities, **and play and recreation settings**, to encourage walking and cycling

User: London Wildlife Trust

We welcome the recognition for the need to incorporate outdoor space and for facilities to be next to parks and green spaces, and that this is supported in para 5.3.10: “Where possible, natural features such as trees, greenery and spaces for food growing should be incorporated into playgrounds and school sites, recognising both the health and educational benefits these can provide.” However, we suggest these clauses are not strong enough in designing in a more holistic approach to ensuring such facilities maximise the benefits of greenspace.

We suggest these clauses are amended to:

B Development proposals for education and childcare facilities should:
8) ensure that facilities incorporate suitable, accessible outdoor space and green infrastructure
9) locate facilities to be as safely accessible to ~~next to~~ parks or green spaces, ~~where~~ as possible

User: The Royal Society for the Protection of Birds (RSPB)

We agree that development proposals for education and childcare facilities should be located next to parks or green spaces. Development proposals should incorporate proposals to create high quality and wildlife-rich outdoor space and facilities that allow people to develop healthy connections with nature.

Suggested amendments to policy S3 [new additions bold, italics]

The wording of policy B 5) should be amended as follows:

‘B Development proposals for education and childcare facilities should:
8) ‘ensure that facilities incorporate ***high quality and wildlife-rich*** ~~suitable~~ accessible outdoor space ***in order to facilitate children’s ability to engage and connect with nature.***

The Draft London Plan should also include a reference to the 25 year Environment Plan and encourage London Boroughs to consider how they can help deliver the commitments of 25 year Environment Plan (p 75) through their local plans such as:

- To develop a Nature Friendly Schools programme for schools in the most disadvantaged areas with input from stakeholders.
- To develop a programme to support schools and Pupil Referral Units in the most disadvantaged areas in establishing progressive programmes of nature contact for their pupils.

User:	Living Streets

We support “2. locate facilities in accessible locations, with good public transport accessibility and access by walking and cycling

3. locate entrances and playgrounds away from busy roads, with traffic calming at entrances

4. link to existing footpath and cycle networks to create healthy routes to schools, and other education and childcare facilities, to encourage walking and cycling”

User:	New Policy Institute

Add new paragraph to A:
4. Where possible good quality primary schools and affordable child care should be within walking distance of people’s homes. Air quality is a crucial aspect of “quality” in both these cases.

Research into Acceptable Place Standards found strong agreement amongst participants that access to primary education should be within walking distance of homes.

User:	PAFH - Physical Activity for Health (London Sport)

We strongly support the statement which encourages schools to open up their facilities, which could provide many more opportunities for both informal and formal recreation, and a range of physical activities, as well as formal sport. In addition, we strongly support that opportunities to maximise active travel to and from school and play facilities are maximised.

User: Queen Mary University of London

Higher Education Facilities

As drafted, the Plan does not contain a specific policy relating solely to higher/ further education facilities despite policies within the London Plan setting out the vital role that Universities have in regard to the economic development of London. The supporting text to Policy S3 (Education and Childcare Facilities) specifically identifies at paragraph 5.3.8 that Universities are a *"significant employer and attract[s] major international companies able to benefit from universities' research reputations, such as in pharmaceuticals and life sciences"*. The text continues stating that *"Universities [also] play a vital part in ensuring Londoners have the higher order skills necessary to succeed in a changing economy and for the capital to remain globally competitive".*

Given the significant contribution that Universities provide to London and the London economy and competitiveness, QMUL would suggest that a standalone policy should be developed which sets out clear support for the growth and enhancement of Universities and their associated infrastructure and facilities.

Whilst Policy S3 (Education and Childcare Facilities) does set out that higher education facilities should be delivered in accessible locations, with good public transport and access by walking and cycling it does not develop this further in terms of clearly identifying support for the growth of these institutions. Whilst it is appreciated that higher/ further education facilities are noted within this policy, QMUL would seek to ensure that the policy also promotes the expansion of higher education facilities within existing campuses, near to existing higher educational facilities and in highly accessible locations. It is critical to the efficiencies and operation of Universities that there is a co-existence of accommodation and facilities, and therefore there needs to be support for expansion near to or intensification of campuses.

Policy S3 (Education and Childcare Facilities) also acknowledges that a forum for higher education institutions has been established by the Mayor to work with Boroughs and other stakeholders to plan future developments. QMUL would welcome further engagement and participation in these forums for higher education and welcome the opportunity to meet with the GLA and various stakeholders.

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User:	The British Library

Policy S3 – Education and childcare facilities

The focus of this policy to promote a sufficient supply of education facilities to offer educational choice for both adults and children is fully supported. Education and learning is vitally important to London, as it is anywhere else in the UK and reaffirming this in the DLP is a welcome inclusion.

User:	Vital OKR

Policy SC regarding health and social care and Policy S3 regarding education and childcare facilities say good things about the relationship to where people are, and to public transport, but this should be explicitly linked to high street settings as incorporated within the town centre network. To achieve good growth there should be encouragement for the location of health and education provision in high street settings.

User: London Borough of Newham

Policy S3 Education and childcare facilities

LBN are generally supportive of this policy which is complementary to Newham's Draft Revised Local Plan.

However, paragraph 5.3.5 needs to include commentary that acknowledges the lack of optimal sites for schools. The policy also needs to ensure that it does not become a poor substitute for the proper tackling of air pollution and the creation of good walkable access. In relation to secondary school provision, issues related to the appropriate distribution of schools that takes into consideration potential adverse impacts on existing patterns of application (e.g. gender balance/viable levels of pupils) and staff recruitment should be discussed, alongside the London Schools Atlas, in paragraph 5.3.7. The issue of loss of facilities should link back to points F and G in Policy S1 Developing London's social infrastructure to ensure any release of education facilities is managed effectively

User:	London Borough of Sutton

OBSERVATION. The London Borough of Sutton broadly supports Policy S3 Education and childcare facilities, and has identified a number of sites for schools in its recently adopted Local Plan to address the need for school places in the borough. However, the council considers that much of the policy includes detailed design matters which are not strategic issues and should be addressed at a local level.

User: Ms Deirdre Woods

7: FOOD HUBS

Food production hubs can play a useful role within the city. These might be integrated light industrial developments which involve food growing, local food processing and markets based upon these which provide alternative food systems not subject to the whims of large industry. Food hubs can act as a distribution point for small-scale agroecological producers, provide opportunities for SMEs and start-ups, provide good food for all, act as community centres, and provide education, training and jobs. Even imported foodstuffs obtained from regional wholesale centres can be processed in these food hubs. Food hubs can provide social spaces as well as job opportunities which are connected to a range of cultural understandings of what a lifetime neighbourhood means in practice.

The promise of community food hubs has been highlighted in reports such as “Community Food Hubs: Helping make Edinburgh a Sustainable Food City” by The University of Edinburgh and “Good planning for good food: How the planning system in England can support healthy and sustainable food” by Sustain. Food hubs are being promoted in other cities. It is vital that these initiatives are supported through the planning system in London.

In relation to E9.B:

We suggest the addition of a 10th pt:

In Development Plans, boroughs must 10) support the establishment and continued existence of community food hubs as sites which combine spaces for the growing, preparation and eating of healthy foods in an inclusive environment alongside distribution points for small-scale agroecological community produced food.

I feel this needs designing into the sections on health and social care facilties (S2), education and childcare facilities (S3), sports and recreation facilities (S5) and suggest the following policies:

In development plans and in planning decisions, boroughs must:

1. Encourage the start-up of food hubs which are located in Town Centres which work in partnership with schools and colleges to encourage food based businesses by offering training skills in food growing, marketing and distribution as well as environmental management, managing food waste, and addressing food poverty, providing a variety of skills to encourage localised, self-reliant development within each borough, but also facilitating advantageous cross borough connections which can benefit London as a

whole and households across each region.

2. Develop strategic partnerships between public health initiatives, community food hubs and social prescribing to optimise benefit to local communities in terms of well-being, improved mental health and social enterprise.

User: Legal and General Capital

Policy S3 Education and childcare facilities

The wording of Policy S3 should be strengthened to ensure that a sufficient supply of new schools are built to meet the needs of London's growing population.

As drafted, Policy S3 refers to "boroughs should identify sites for future provision through the Local Plan". The policy wording should be amended to "must identify", the same as draft policies relating to housing and employment (Policy x).

Building new schools to reduce education inequality should be on a par with building new homes and creating jobs and the London Plan policy wording for these critical issues should be consistent.

To use a local example, there is an identified need for two new secondary schools north of the A40 in LB Hillingdon (acknowledged by the Council and the ESFA). There are currently no available sites to build the schools and there are no proposed allocations included in the draft Local Plan Part 2 to meet the identified need in the future. It is critically important that the London Plan provides a strict and enforceable strategic framework to make sure that the evidence need for schools are planned for and delivered through Local Plans.

User:	Barnet Society

Para 5.3.6

A reference should be added to the Department for Education/Education & Skills Funding Agency publication BB 104 (2015) *Notes on area guidelines for SEND and alternative provision*:

https://www.gov.uk/government/publications/send-and-alternative-provision-area-guidelines/notes-on-area-guidelines-for-send-and-alternative-provision-bb104

User:	Dagenham Dock Limited

Draft Policy S3 – Education and childcare facilities

DDL wish to express the same concerns to Draft Policy S3 as noted above to Draft Policy S1 and S2.

User:	Landscape Institute London

LI London questions why only new schools are mentioned as having potential for food growing. There is a lot of scope for food growing to be carried out at existing schools – even Inner City schools with little outdoor space and no sports fields have potential for growing salad crops in planters, and elsewhere most schools could find space. LI London notes that no mention is made of growing food in schools in Policy S3 Education and childcare facilities.

User: United Colleges Group (UCG)

The Draft Plan recognises that access to high quality education and training has a profound effect on people's life chances. This is translated in to an unequivocal strategic approach that it is set out within draft Policy E8. The draft policy states:

London's higher and further education institutions and their development across all parts of London should be promoted. Their integration into regeneration and development opportunities to support social mobility and the growth of emerging sectors should be encouraged.

It is further stated at paragraph 5.3.8 that:

Access to further education (FE) plays a key role in skills development and life-long learning and assists with Londoners' progression into, and through, sustainable employment, including apprenticeships. There is a predicted increase in demand for FE provision, due to the growing number of 16-19 year-olds and the new requirement for all young people to remain in learning until they are 18. Meeting this growing demand will require strategic planning and working across boroughs. FE institutions also provide valuable community facilities and services. The Mayor will continue to support the enhancement of FE colleges and other training facilities through the Skills for Londoners Capital Fund.

The Group recognises the growth in demand for high quality education and will continue to do all it can to play its part in contributing to this important sector. Consequently, the Group welcomes the recognition of the issues facing the education institutions of all scale and type. The Group expresses its strong support for the wording of the Draft Plan in this respect.

User: North London Collegiate School

Draft Policy S3 – Education and childcare facilities

Draft Policy S3 seeks to ensure that there is a sufficient supply of good quality education and childcare facilities to meet demand and offer educational choice in the London boroughs. Whilst NLCS supports the Mayor's aspiration for education facilities as set out in Draft Policy S3; it is essential that the London Plan also facilities the growth and development of independent schools across London, which in many cases have much larger pupil catchment areas which do not always facilitate travel by walking or cycling (as required by Draft Policy S3B2).

NLCS is also supportive of the aspiration of Draft Policy S3 to maximise the extended or multiple use of educational facilities for community or recreational use; an approach which is already at the core of the NLCS site at Canons Park. However, in order to enhance this offer further through *'appropriate design measures' as* the draft London Plan suggests, NLCS requests that the Mayor and the boroughs positively engage on design solutions for challenging sites such as NLCS in order to achieve the wider strategic objectives of Draft Policy S3. Please refer to the commentary below on Draft Policy G3 which elaborates further on this point.

It is also important that Draft Policy S3 recognises the practical constraints of offering the use of educational facilities to the community for leisure and recreation, alongside the requirement to safeguard pupils who may be affected by such use. Accordingly, Policy S3 should be drafted to acknowledge this constraint and assess suitability of wider use by the community on a site by site basis.

User: United Colleges Group (UCG)

Policy consistency

In light of the above, Part G of Draft Policy S1 provides an opportunity for educational institutions, such as UCG, to explore opportunities to invest in development proposals by releasing redundant land for redevelopment as other forms of social infrastructure.

The co-location, consolidation and intensification of educational uses will present opportunities for institutional investment in other land uses of a higher priority, such as residential. UCG consider that this should be made clearer within the policy.

This will create a significant opportunity to provide homes for Londoners whilst also generating income to be invested in further improvements to learning facilities for community or social use. However, there is an inherent policy conflict with other elements of the Draft Plan (for example Draft Policy S3). In this regard, the plan should be carefully considered to ensure that opportunities for creative development planning solutions are not precluded by default.

User:	London Borough of Ealing

The Council supports this policy and the Mayor will be aware of our innovative approach to the identification of new school sites in a recently adopted bespoke Planning For Schools DPD.

The encouragement for the co-location of schools (Para 5.3.12) is welcomed but it would be more helpful if this was incorporated into actual policy and not just the supporting text.

User:	Ms Stacey Lewis
We support the requirement for education and childcare facilities to be accessible locations and link to existing footpath and cycle networks	

User: Mr Timothy Gill

The reference to ‘healthy routes to school’ is welcomed. Evidence shows that the distance and route to school are amongst the most significant factors in ensuring children travel actively.

Para 5.3.10 - To make this more achievable, I suggest amending the fourth sentence to read:

‘All children should be able to travel to school by walking, cycling or public transport *and the closer their home is to school the more likely they are to do this.*’

User: London Parks and Gardens Trust

Policy S3 Education and childcare facilities

B Development proposals for education and childcare facilities 9) locate facilities next to parks or green spaces, where possible

The Trust notes the above policy and agrees with Comment 5.3.10 that the design of education and childcare facilities is critical to the creation of a good learning environment but is concerned that locating a school next to a park or other green space may be seen as a substitute for providing on-site play areas, which should maximize opportunities for introducing biodiversity and green landscape.

The Trust therefore recommends a rewording as follows of the previous paragraph: 8) ensure that facilities incorporate suitable accessible outdoor space *onsite, ideally at ground level, which provide as much green space as possible for contact with nature and increasing biodiversity*

User:	Sean Creighton

As a Governor of a primary school, and having in the past been a Clerk to several Governing Bodies, I am disappointed that this Policy does not include a moratorium on building on school playing fields.

User:	Andrea Carey Fuller

Particular consideration should be given to the views of children and young people in the design of new provision and in proposed changes to existing provision to understand their needs, eg Policy S3 Education and childcare facilities 5.3.12.

User:	Kent County Council

Expand S3 B 8) to better acknowledge provision of environmental services:

8)ensure that facilities incorporate suitable, accessible outdoor space incorporating treesand other vegetation to cool, shade, enhance setting and boost biodiversity.

User: New City College

Support policy.

The college welcomes the recommendation for a strategic approach to the planning of future secondary school sites. This approach should involve an assessment of existing provision for 16 to 19-year-olds in the local area in consultation with current education providers.

the strategic approach should be complemented by a case-by-case assessment of the viability of proposed new secondary schools. As such, the college recommends removing reference from the London Plan to school sites being allocated in the Development Plans.

User: YMCA

LONDON YMCA INTERGENERATIONAL AND NEIGHBOURHOOD BASED CARE MODEL

London should spearhead solutions to providing spaces where its diverse population interact and build trust. YMCA could build on existing offer of accessible, affordable, high quality early years and day care to create intergenerational nursing home/ nurseries building up Londoner’s capacity to care from an early age. This is an integral part of the human development gym, which would create a team-based curriculum for children to encourage the skills we want in our Londoners: courage, care, craft, creativity etc.

User: Kingston First

Kingston First supports the wording of draft Policy S3 and the need to plan positively for new and the expansion of existing education facilities. Facilities for Higher Education bring a wide range of socio-economic benefits and it is important that local authorities plan positively for them.

The London Plan should emphasise the importance of such establishments and encourage a degree of flexibility within the planning system to accommodate their growth.

Whilst it is important that educational facilities integrate with the surrounding area, Local Planning Authorities should support their growth and avoid ad-hoc developments which disperse facilities over a wide area. The London Plan should encourage the establishment of educational quarters and the types of supporttng infrastructure and facilities needed to foster their growth.

User: London Borough of Camden

Camden supports the approach to education set out in policy S3 and the funding of this provision is a section 106 and CIL priority. However, the need to fund this provision may affect the ability to fund some other forms of social infrastructure, which may undermine other policies in this section of the Plan.

Criterion A (3) - We support the principle that residential and commercial developments, where there is a need, contribute to childcare provision. However, the policy should give an indication of the size of schemes it is intended to apply to. It may not be realistic or viable for smaller developments.

Criterion B - The Plan could be strengthened by encouraging boroughs to consider health services in early years settings, particularly co-location of health visitors, breastfeeding support, etc..

User:	Age UK London - a charity working with older Londoners

POLICY S3: EDUCATION AND CHILDCARE FACILITIES

PROPOSED POLICY AMENDMENT:
1) Add to S3(B)(7): ‘....including disabled AND OLDER people’.
2) Add ‘further education’ facilities toS3(B).

User:	Age UK London - a charity working with older Londoners

43. S3 LINK TO POLICY CHANGE should include a reference to further education, training and re-training. Professor Tinker recommended that the GLA worked with the then Age and Employment Network to persuade employers that re-training older workers is a sound investment. Whilst Equal opportunities policies have become more widespread, practices have not and older workers are less likely to receive training than other workers, (but those that do are satisfied with the training offered) (Older Workers and the Workplace DWP Feb 2017) Professor Tinker also refers to the fact that older people will continue to require carers but that care workers are in need of improved training, if older people are to maintain quality of life.(Professor Anthea Tinker and Professor Jay Ginn, ‘How Far has London Come as an Age Friendly City?).

44. S3B7 Add ‘and Older ‘after disabled please refer to GG1A 4.

User:	Mrs Jean Smith

Schools should be made available to local children, as they were before the Plumstead ruling. too much choice has lead to an industry built around ridiculous journeys ferrying pupils from one side of London to the other. To what effect? has their experience really improved? What of the experience of 'ordinary folk' who have to travel long distance because others are compelled to choose schools out of their own areas.

User: Association of Directors of Public Health

ADPH London agrees with the social infrastructure policies.

In particular, in S3 B we support actions to locate education and childcare facilities in accessible locations, with good public transport, accessibility and access by walking and cycling; and to locate entrances and playgrounds away from busy roads, with traffic calming at entrances.

We support the proposal in S3 B to link to existing footpath and cycle networks to create healthy routes to schools, and other education and childcare facilities, to encourage walking and cycling. However, we would like to see this action extended to all short trips undertaken by all members of the community.

We recommend that action S3 B 4) be amended to: **link to existing footpath and cycle networks to create healthy routes to community assets including schools, and other education and childcare facilities, play and recreation settings, and community centres, to encourage walking and cycling.**

We would like to see an additional aspiration that all children and young people are able to walk or cycle to school – reducing pollution levels, and increasing levels of physical activity.

This aspiration is in line with the with the Mayor's draft Transport Strategy. We are hopeful this will reinforce the message that facilitating active travel is the responsibility of all planners and developers, and not solely transport planners.

We would like to see an action inserted in S3 B as follows: **Local authorities should set ambitious targets for the proportion of children and young people travelling by walking, cycling, scooting, or public transport for all or part of the journey to new primary and secondary schools. In terms of primary schools the target should be 90% from the adoption of the London Plan.**

We would also like to see a further action inserted in this section: **Use the Healthy Streets Approach to prioritise health in all planning decisions, including the promotion of active travel and physical activity; and the encouragement of a 20 mph speed limit in close proximity to educational settings such as children's centres and schools.**

User: London national Park City Foundation

Education and childcare facilities - Policy S3, Page 208

B 8) ensure that facilities incorporate suitable, accessible outdoor space

9) locate facilities next to parks or green spaces, where possible

10) ensure that there is not a net loss of facilities, unless it can be demonstrated that there is no ongoing or future demand.

LNPCF PROPOSAL: LNPCF finds that this policy (parts B 8, 9 and 10) referring to school open space and access provides a get-out clause to remove space if this can be justified, which is highly likely. The supporting paragraph on page 211 should be made part of *Policy S3* with more enthusiasm:

Where possible, natural features such as trees, greenery and spaces for food growing should be incorporated into playgrounds and school sites, recognising both the health and educational benefits these can provide. Healthy and safe routes to education and childcare facilities, should be considered through the design process.

Policy S4 Play and informal recreation

User:	Age UK London - a charity working with older Londoners

45. S4 LINK TO POLICY CHANGE Add new Criterion C. According to research (‘The relationship between outdoor activity and health in older adults using GPS’ J Kerr et al 2012 International Journal of Environmental Research and Public Health Research 2012 Dec; 9(12): 4615–4625), being outdoors and being active were both related to greater self-reported physical functioning, less fear of falling and fewer depressive symptoms. This research also suggests that currently “limitations in physical functioning, fear of falling and neighbourhood design may prevent older adults from being active outdoors so safe environments to support such activity will be crucial.” The London Plan, insistent on producing Healthy Streets and promoting activity, should therefore incorporate external recreational activity for older adults including, for example, facilities such as outdoor gyms for older people, routes for flat walking and by supporting free exercise activity in parks.

User:	David Callow

Policy S4. Play and informal recreation. I support section B2)d, that residential development proposals for schemes that are likely to be used by children and young people should incorporate good-quality, accessible play provision for all ages, of at least 10 square metres per child that: “incorporates trees and/or other forms of greenery”.

User:	David Tannahill

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User:	Elisabeth Rolls

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User:	Adrian Malcolm Darley

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User:	Agnes Byrne

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User: Alan Jacobs

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User:	Alan James North

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User:	Fenella Barton

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User:	Joan Anne Hepworth

Policy S4 - sectionB2)d which sets out proposals for play areas for children and youngsters which should be at least 10 square metres per child and incorporate trees and green space.

User: Association of Directors of Public Health

In Policy S4 Play and informal recreation, the ADPH London would like to stress the importance of opportunities for play and informal recreation, and that children and young people can access them independently. S4 provides an opportunity for a 'sea change' in provision.

We recommend that action S4 B be strengthened to: **Development proposals for schemes that are likely to be used by children and young people should be co-produced by stakeholders, parents and children and young people and should: …**

We also feel it will be useful to include a definition of a 'playable space' so that Part S4 B 4) of the policy becomes more helpful. We recommend that action S4 B be improved with an additional action: **Development proposals for schemes that are likely to be used by children and young people should: (insert new 1) offer spaces for play that are recognised as 'playable'.**

This might be supplemented with guidance on what constitutes a playable space such as the GLA's Play and Informal Recreation SPG, in para 3.23: 'A playable space is one where children's active play is a legitimate use of the space. Playable space typically includes some design elements that have 'play value': they act as a sign or signal to children and young people that the space is intended for their play. The creation of play value through fixed equipment, informal recreation activities or engaging landscaping features should be a key requirement'.

We also strongly support the concept of intergenerational playgrounds or public spaces that work for all members of the community and encourage interactions between all ages – children playing with parents and grandparents for example. The delivery of high quality spaces will produce better playgrounds, better play, inclusive, stronger communities, and enriching experiences across the generations.

We recommend that action S4 B be strengthened to include an action: **consider the development of intergenerational playgrounds to encourage better play, inclusive, stronger communities, and enriching experiences across the generations.**

Younger children are usually accompanied at playgrounds by their parents/carers, so in addition to considering intergenerational play, play spaces intended for younger children should provide facilities for parents/carers to socially interact whilst supervising their children. We therefore recommend an additional action under action S4 B: **Consider the needs of adults supervising children through the provision of facilities that encourage social interaction, such as seating for example.**

We also wish to encourage the growth of incidental or informal play – which relates to a healthy streets approach, closing streets on a Sunday for ‘play streets’[1], for example.

User:	William Lucy

Policy S4 Play and informal recreation **Support section B2)d**, that residential development proposals for schemes that are likely to be used by children and young people should incorporate good-quality, accessible play provision for all ages, of at least 10 square metres per child that: “incorporates trees and/or other forms of greenery”.

User: London national Park City Foundation

Play and informal recreation - Policy S4

LNPCF PROPOSAL: LNPCF find that the policy and supporting text underplay the role of natural play and lack strength in how this is part and parcel of play, of being outdoors and of informal and formal learning and recreation.

A. Boroughs should:

1) undertake audits of existing play and informal recreation provision and opportunities, and assessments of need, considering the quantity, quality and accessibility of provision

2) produce strategies on play and informal recreation facilities and opportunities, supported by Development Plan policies, to address identified needs.

B Development proposals for schemes that are likely to be used by children and young people should:

1) increase opportunities for play and informal recreation and enable children and young people to be independently mobile

2) for residential developments, incorporate good-quality, accessible play provision for all ages, of at least 10 square metres per child that:

a) provides a stimulating environment b) can be accessed safely from the street by children and young people independently c) forms an integral part of the surrounding neighbourhood d) incorporates trees and/or other forms of greenery.

3) incorporate accessible routes for children and young people to existing play provision, schools and youth centres, within the local area, that enable them to play and move around their local neighbourhood safely and independently

4) for large-scale public realm developments, incorporate incidental play space to make the space more playable

5) not result in the net loss of play provision, unless it can be demonstrated that there is no ongoing or future demand.

4) mobile within their neighbourhood, is important for children and young people's wellbeing and development.

5.4.2 Many children and young people, however, find that there are limited opportunities for them to play in their local neighbourhood. This is often not because of a lack of formal play provision, but due to restrictive street design and layouts, poor links between spaces for play and recreation, and the threat of busy roads and traffic. Developments should encourage children and young people to move around freely through safe streets and footpath networks that connect to more formal play provision, green spaces and parks, and that follow the Healthy Streets Approach.

5.4.3 Where formal play provision is provided in new developments, it should be free, well-designed, accessible, inclusive and stimulating. It should integrate into the wider network of public open spaces and not be severed from the rest of a neighbourhood by physical barriers such as main roads. Play provision should be overlooked in some way to allow for a level of informal community supervision and generate a sense of safety and security. Integrating natural environments into play provision is encouraged, acknowledging the benefits to learning, and to help to support a green infrastructure network across the city.

5.4.4 There should be appropriate provision for different age groups, including older children and teenagers. Particular consideration should be given to consultation with children and young people in the design of new provision to understand their changing needs. The needs of parents and carers should also be considered in the design of these spaces. Appropriate arrangements for management and maintenance of play and communal facilities should be provided. Youth facilities for young people should also be incorporated where possible to ensure that young people have suitable spaces to meet and play and feel welcome and included in developments and the public realm.

5.4.5 Formal play provision should normally be made on-site and in accordance with Development Plans' play policies for the area, using a benchmark of 10 square metres per child as a basis for assessing future requirements arising from a projected increase in the child population of the area. Supplementary Planning Guidance will provide additional detail on the application of this benchmark and other implementation issues. Where development is to be phased, there should be an early implementation of play space.

5.4.6 Off-site provision, including the creation of new facilities or improvements to existing provision, secured by an appropriate financial contribution, may be acceptable where it can be demonstrated that it addresses the needs of the development whilst continuing to meet the needs of existing residents. This is likely to be more appropriate for the provision of play facilities for older children, who can travel further to access it, but should still usually be within 400 metres of the development and be accessible via a safe route from children's homes. Schools, school playing fields and other facilities can also provide an important contribution to play and informal recreation facilities and should be encouraged to allow community access to facilities out of hours.

5.4.7 Through the development of play strategies, boroughs should ensure the integration of play provision and child-friendly neighbourhoods into other borough strategies.

User: Keith Saunders

The importànce of trees and woodlands cannot be emphasised enough. They improve air quality, provide vital habitat for wildlife, much of which is disappearing from urban areas and aesthetically they help to brea? up views of endless buildings. Also, people feel better and more relaxed in wooded areas. I work as a conservation volunteer and any time spent in woodland makes me feel better in myself.

In the sections listed below (in the same order as they appear in the draft London Plan).

- Paragraph 1.3.3. Recommend an addition (in CAPS) to the following sentence: “Access to green and open spaces, including waterways AND TREES, can improve health, but access varies widely across the city.”
- Paragraph 3.9.5. I support the inclusion of “Protection for trees” as an issue in the amplification of potential negative impacts of large-scale basement development beneath existing buildings.
- Policy H1. Increasing housing supply. I recommend that Sentence B2)d is clarified so that “public sector owned sites” will not include woodland, parks and open spaces.
- Paragraph 4.2.9. I support the principle of “no net loss of overall green cover” as a result of small housing developments, and support “off-site provision such as new street trees” in order to achieve this principle. I recommend an addition (in CAPS) to the following sentence: "Loss of existing biodiversity OR GREEN SPACE, as a result of small housing developments, should be mitigated through measures such as the installation of green roofs, the provision of landscaping that facilitates sustainable urban drainage, or off-site provision such as new street trees in order to achieve the principle of no net loss of overall green cover. Rainwater attenuation features should be incorporated to achieve greenfield run off rates. LOSS OF ANY PUBLIC GREEN SPACE WILL BE COMPENSATED FOR WITH ALTERNATIVE ACCESSIBLE SITES.”
- Policy S4. Play and informal recreation. I support section B2)d, that residential development proposals for schemes that are likely to be used by children and young people should incorporate good-quality, accessible play provision for all ages, of at least 10 square metres per child that: “incorporates trees and/or other forms of greenery”.
- Policy G1. Green infrastructure. I support this policy, and subsequent narrative that mentions the important role of trees.
- Policy G5. Urban greening. I support this policy, including the recommended Urban Green Space Factor, and subsequent narrative that mentions the important role of trees. I support the inclusion of the role and weighting for woodland and trees in Table 8.2 - Urban Greening Factors. I recommend including a reference to Residential Development and Trees (Woodland Trust, 2015, woodlandtrust.org.uk/residentialdevelopments).
- Policy G6. Biodiversity and access to nature. I support this policy. I recommend that Sites of Metropolitan Importance and all ancient woodlands are added to the categories of planning applications that must be referred to the Mayor.
- Policy G7. Trees and woodlands. I support this policy. I recommend that Section B)1 is strengthened as follows (amendments in CAPS): “GIVE THE STRONGEST POSSIBLE protectION TO ‘veteran’ trees and ancient woodland, ESPECIALLY where these are not already part of a protected site”. I support the subsequent narrative on the role of trees, particularly paragraphs 8.71 – 8.73. I recommend referring London boroughs to guidance on ancient woodland and veteran trees: Planners’ manual for ancient woodland and veteran trees(Woodland Trust, 2017, woodlandtrust.org.uk/plannersmanual).

Please accept this my formal response to the consultation. I will look forward to hearing from you as the Plan progresss.

User: London Parks and Gardens Trust

Policy S4 and S5

In recommending this wording above for Policy S3 B 8, the Trust notes that both policy S4 and S5 mention off-site provision. For both off-site and on-site provision we recommend that consideration be given to the quality of the design of these spaces. If play space is not well designed, play-areas can have quite an impact on the character and visual amenity of historic landscapes and other open spaces, adding clutter in the form of brightly coloured equipment, fencing, gates and CCTV etc. This is compounded in smaller open spaces. The Trust particularly welcomes Policy S4, para B 2,d) incorporating trees and/or other forms of greenery into play schemes.

Policy S5 Sports and recreation facilities

User: LFoSR - The London Federation of Sport and Recreation

Policy S5: "Sport and Recreation Facilities" requires local authorities to assess need and ensure sufficient supply of facilities, as well as plan strategically to provide new facilities and to produce up to date playing pitch strategies.

Section A of Policy S5 states: " In order to ensure there is sufficient supply of good quality sports and recreation facilities, boroughs should: 1) regularly assess the need for sports and recreation facilities at the local and sub-regional level 2) secure sites for a range of sports and recreation facilities 3) maintain and promote the Walk London Network shown on Figure 5.1 and encourage networks for walking, cycling and other activities.

Section B of Policy S5 states "Development proposals for sports and recreation facilities should: 1) increase or enhance the provision of facilities in accessible locations, well-connected to public transport and link to networks for walking and cycling 2) maximise the multiple use of facilities, and encourage the co-location of services between sports providers, schools, colleges and other community facilities 3) support the provision of sports lighting within reasonable hours where there is an identified need for sports facilities and lighting is required to increase their potential usage, unless the lighting gives rise to demonstrable harm to the local community or biodiversity 4) ensure that there is no net loss of facilities, unless it can be demonstrated that there is no ongoing or future demand.

Ensuring a continued focus on playing pitch strategies is a positive.

Point 4) is crucial, particularly as it refers to "future demand" as well as "ongoing" demand; but does it relate to outdoor sport facilities and playing pitches, as well as indoor sports facilities? The fact that outdoor sport seems to be considered in other policies linked to green infrastructure and open space, suggests not.

In 5.5.1 it states: "Sport and recreation facilities are important components of social infrastructure. Both formal and informal facilities should be provided, to encourage physical activity and deliver a range of social, health and wellbeing benefits to communities. People take part in various forms of sport and recreation which require a number of different types of facility. Many activities require minimal facilities, and often an open space or community hall can be sufficient"..

A positive reference. Issue (as above) with regard to what "sport and recreation facilities" means

User: LFoSR - The London Federation of Sport and Recreation

Policy S5: "Sport and Recreation Facilities" requires local authorities to assess need and ensure sufficient supply of facilities, as well as plan strategically to provide new facilities and to produce up to date playing pitch strategies.

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User: LFoSR - The London Federation of Sport and Recreation

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User: LFoSR - The London Federation of Sport and Recreation

There are numerous references in the Plan to encouraging walking and cycling, which form a key ingredient in achieving the Mayor's target to ensure 80% of all journeys are made by walking, cycling or using public transport by 2041 .

The references to walking and cycling are positive in terms of promoting physical activity, but the Plan as a whole is really focusing on this issue in the context of Transport policies. There are no other references to any specific sport and recreation activities in the plan (other than sports ruled out of the benefits of a policy described later in the document).

User: LFoSR - The London Federation of Sport and Recreation

The London Plan is absolutely crucial in shaping the development of sport and recreation in London, at a strategic and local level, in the next 20 years. It is therefore pleasing to see a number of very positive references to sport, recreation and playing fields in the Plan (see Annex 1 to this document). Whilst those references are to be welcomed there are a number of significant issues that the Plan has not addressed, or fails to adequately deal with:

1. The Plan's Planning Policies do not protect open space or playing fields from development, unless the land is in an area of deficiency, or it is designated as Green Belt or MOL. This is a major weakness in the Plan given the major threats to open space and playing fields (demand for housing, demand for new schools, pressure to "commercialise" such spaces to generate new income streams, Councils wishing to reduce revenue costs and realise the value of assets etc.). The Planning Policies in the Plan need to be strengthened as it will be these policies (not the text around them) that will shape Local Plans and Planning decisions;

2. The Plan fails to focus adequately on the important role that Sport can play in the development of London in the next 20 years. The importance of sport is recognised at a local / community level but there is no focus on the importance of the sports sector in driving economic development (new business opportunities, employment, spend in the London economy linked to sport etc); there is very little reference to the role that sport and physical activity can play in improving health and well-being (and helping to address the obesity crisis) and there is no mention about the role that sport can play in terms of community cohesion and helping to address crime and community safety issues.

3. The Plan fails to focus on strategically important sports issues in London: there is virtually no reference to the Olympics or the Olympic legacy (only the Olympic Park); there is no mention of the strategically important sports facilities that London needs (eg 50 metre swimming pools); there is no reference to the role that international sports events can play in raising London's profile and boosting the London economy (there are no references to the planned international events or whether the Mayor will be encouraging bids for new events) and there is no mention of strategically important cross boundary issues such as the provision of playing fields (eg the important role that outer London boroughs play in meeting demand from inner London boroughs). Finally, there is not a single mention of London Sport, even though that body has a lead role in the development of sport in London;

4. The Plan is not clear on whether the references to "sport and recreation facilities" includes playing fields and outdoor sports provision. This is crucial as the Policies in the Plan provide strong protection to "sport and recreation" facilities and if the definition does include playing fields and outdoor sports provision then it could be argued that the Plan provides stronger protection than it might first appear. The problem is the way the Plan is structured and written suggests that playing fields and outdoor sports provision are not included within the definition. This is an important issue that needs clarifying.

Overall the Plan misses an opportunity to properly focus on the role the Sport can play in the development of London in the next 20 years. There are, however, a number of positive references that could be "built on", to ensure that the Plan does properly focus on this role. The Plan is also weak in terms of protecting playing fields and most open space: a failing that needs to be addressed in the final version of the document, following consultation.

The London Federation of Sport and Recreation urges the Mayor of London to recognise the intrinsic benefits of taking part in sport and recreation as well as the very important health, economic and social outcomes it can deliver.

User: London Borough of Barnet

This suite of policies highlights the need for boroughs to undertake a needs assessment of social infrastructure and identify sites for future provision. New facilities should be easily accessible by public transport, cycling and walking. Proposals resulting in a loss of social infrastructure (includes health, provision, education, community and recreation) as well as green infrastructure in “areas of defined need” should be refused unless able to be re-provided. Also, that redundant social infrastructure to be considered for other social infrastructure types before any alternative development. Whilst supportive of the intent of these policies and investment in infrastructure, we would welcome more support from the Mayor in helping to deliver infrastructure.

We welcome Mayoral support for importance of ensuring suitable childcare provision and accessibility of play spaces by active travel as planning considerations. However, the new London Plan should recognise that detailed planning for social infrastructure is best achieved at Borough level so as to ensure proper account is taken of the different needs and priorities of individual communities and neighbourhoods. Public health intelligence can be used to identify the needs of communities as well as gaps in social infrastructure. Barnet’s new Local Plan will therefore consider local health intelligence when identifying priorities.

User:	Amy Luff
Informal and formal outdoor sports facilities, including for ball sports, should be protected and enhanced.	

User:	Ms Ann Turvey

Outdoor sports areas should be protected and more spaces found – especially as many of these open fields/areas have over the last few years disappeared, often under concrete.

User: London Assembly Planning Committee

Recommendations Policy S5 Sports and recreation facilities should include a new policy that states that new stadiums should ensure that: • new housing developed as part of, or around, a new stadium, is of mixed tenure, to include affordable housing and housing of three bedrooms or more (see Policy H1 Increasing Housing Supply, Policy H5 Delivering affordable housing, Policy H7 Affordable housing tenure, and Policy H12 Housing size mix). • they have engaged with a diverse range of local community and stakeholder groups to: ? identify effective uses of the stadium scheme as a community asset ? communicate what social infrastructure will be provided ? establish an ongoing relationship with the community • where a stadium is financed or part-financed with public funds, stadium proposals should establish a community forum involving members of the public and stakeholders from the local community. The Planning Committee recommends Policy S5 4 is amended to read ‘unless it can be demonstrated that there is no ongoing or future demand which has been established on a cross-borough or sub-regional level’.
6.13 The Regeneration Committee made the case for a Stadium Charter in its March 2015 report The Regeneration Game: Stadium-led regeneration.51 The Charter called the Mayor to commit to:
• a clear vision and policies for place-making around the new (or expanded) stadium, including public transport connectivity and permeability between the stadium and surrounding area.

undertake a skills mapping exercise to assess local capacity to take advantage of new jobs. The results should inform a skills and employment strategy, including measures to prepare and upskill local communities in order that they can access the new jobs.
• pay the London Living Wage to all stadium employees.
• support the Mayor's housing targets in all stadium-led regeneration schemes, where practical. Any new housing developed as part of, or around, a new stadium, should aim to be mixed tenure, to include both family and social rented affordable housing.
• demonstrate how they have consulted with a diverse range of local community and stakeholder groups to:
• identify effective uses of the stadium scheme as a community asset
• communicate what social infrastructure will be provided
• establish an ongoing relationship with the community.
6.14 In addition, in cases of a stadium financed or part-financed with public funds, the Mayor should: require a community forum to be set up to involve the public and communities in a stadium before the new venue is built. This would give communities a say on how the stadium is used, and what social infrastructure is provided.
6.15 With the ongoing issues facing the operation of the London Stadium and the redevelopment or proposed redevelopment of stadiums such as Stamford Bridge and Loftus Road it is timely and appropriate to introduce a more rigorous approach to stadiums in the draft London Plan. Since stadium planning applications are typically referred to the Mayor, it is appropriate that there is clear policy in the London Plan on this matter.52
6.16 Policy S5 Sports and recreation facilities is the only place where stadiums are mentioned in the Plan. This policy is clearly aligned towards the provision of smaller facilities and makes no differentiation between larger developments such as stadiums and smaller developments, such as playing fields. Stadiums place significantly higher demands on local communities and bring with them opportunities for regeneration and new development that require careful consideration.
6.17 The Planning Committee also considers Policy S5 inadequate in protecting London's playing fields. The London Playing Fields Foundation has noted the progressive loss of playing fields in the capital, for example: 40 per cent of London's cricket pitches over the past 20 years.53
6.18 It cites two main reasons why so many sites are vulnerable:

- Playing fields are loss-making operations and it is difficult to justify their ongoing maintenance, modernisation and management from an economic point of view.
- The pressure to deliver more homes means selling off a playing field can provide local authorities (who own 85 per cent of London's playing fields) with the triple benefit of realising a significant capital receipt, meeting Government housing targets and removing a huge recurring maintenance obligation.

6.19 The Draft Plan notes that sport and recreation facilities are important components of social infrastructure as they encourage physical activity and deliver a range of social, health and wellbeing benefits to communities. Further, Policy S5 Sports and recreation facilities requires boroughs to regularly assess the need for sports and recreation facilities at the local and sub-regional level and secure sites for a range of sports and recreation facilities.

6.20 Some boroughs have very limited access to playing fields within their boundaries and are reliant on provision in adjacent authorities. A borough that concludes it has ‘over provision’ needs to make its assessment within a cross-boundary or sub-regional context – recognising that neighbouring boroughs may have insufficient provision and little prospect of securing new provision within their boundaries.

6.21 Given the projected scale of London’s growth, and the role that existing playing fields play as a cross borough resource, the Planning Committee recommends Policy S5 4 is amended to read ‘unless it can be demonstrated that there is no ongoing or future demand which has been established on a cross-borough or sub-regional level’.

User:	London Borough of Haringey
The Policy is supported	

User:	London Cycling Campaign

Replace A 3):
“encourage” with ***provide***

Replace B 1):
and link to ***high quality*** networks for walking and cycling

Add B 5):
provide cycle parking spaces in line with table 10.2 p 417

Note that for some sports facilities (e.g. swimming pools) the cycle parking levels recommended in table 10.2 are too low based on current usage.

User:	London Borough of Lewisham

We welcome good quality sports facilities especially when accessible by walking and cycling networks connecting and improving links across borough boundaries.

However, we recognise that some leisure facilities such as 50 metre swimming pools and diving pools need collaboration over wider than local level. There is a need for the GLA to intervene from a funding perspective to ensure delivery of such infrastructure.

User: London Borough of Brent

The policy is supported. There are however fundamental challenges on this matter related to public sector funding/ increased pressure due to population rises/ opportunities for land for extensive new facilities which will place a greater reliance on provision on multi-functional artificial pitches. There may also be current restrictions on some facilities related to hours where additional lighting is not required. The policy could be amended to allow greater flexibility to assist in increasing capacity of facilities.

Amend wording to:

B 3) "support extended opening hours and the provision of sports lighting within reasonable hours where meeting there is an identified need for sports facilities and lighting is required to increase their potential usage, unless the lighting gives rise to causing demonstrable additional capacity and there is no unacceptable harm to the local community or biodiversity"

User:	London Borough of Bromley

There are numerous facilities in Bromley which are within the Green Belt. The Council is therefore concerned that the policy no longer cross references Green Belt policies.

User: London Councils

The objectives of this policy can be supported but there is concern that a lack of resources may hinder them from carrying out regular assessments of sports and recreation facilities in their area. The Plan must specify what is meant by “regular” assessments of sports and recreation facilities and highlight how the Mayor intends to support boroughs in undertaking regular assessments

The Mayor could benefit from highlighting the work being undertaken by boroughs and offer a means to support the boroughs in undertaking or updating similar strategies, as a means to incorporate the London Plan in to each borough’s Local Plan.

User:	London Borough of Tower Hamlets

Stronger emphasis on promoting walking and cycling is supported.

New policies justify the loss of sport facilities by the lack of current and future need. We are concerned that this may result in the loss of sport facilities for other types of uses. It is recommended that where the loss of a sport facility is justified by the lack of need, it should be replaced by and alternative community facility in line with policy S1.

We support the proposal to increase opportunities for play to enable CYP to be more independent and support development of accessible routes to promote play provision.

User:	Royal Borough of Kingston
Support.	

User:	London Borough of Hounslow

Policy S5 should require consideration of traffic demand management of playing pitches should be referenced in this policy, as playing pitches can contribute to increased flows of traffic (both motor traffic and public transportation) during use, especially for large playing pitches in areas of poor public transport accessibility.

User:	London Borough of Hackney
Hackney supports this policy.	

User:	Ms R Farooq
Informal and formal outdoor sports facilities, including for ball sports, should be protected and enhanced.	

User:	Westminster City Council
Criterion B(3) should include the requirement to take steps to minimise the impact of sports lighting mentioned in paragraph 5.5.7.	

User:	London Borough of Southwark
The council recommends that new sports facilities should be fully accessible and should cater for both children and adults and all ability levels.	

User: Eastcote Hockey & Badminton Club

The plan recognises the shortage of AGP's with only 55% of the demand being met. In the London Borough of Hillingdon where we are situated, AGP's have and are being constructed without floodlights as the council is very restrictive in granting this planning permission, which means that community use is being denied other than weekend daytime. Also the financial viability of these pitches is at risk if they cannot be used in the evenings due to loss of revenue needed to sustain long term maintenance and replacement.

The plan should carry a much stronger direction on all councils to maximise the use of AGP's by granting permission for floodlighting which should only be denied in exceptional circumstances.

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The plan should carry a much stronger direction on all councils to maximise the use of AGP's by granting permission for floodlighting which should only be denied in exceptional circumstances.

User:	London Borough of Wandsworth
Welcome the policy to ensure an adequate supply of sports and recreation facilities.	

User:	The Northbank BID

Chapter 5 Social Infrastructure
Policy S5: Sports and recreation facilities

Areas for play, relaxation are scarce in central London, we supports the design of parks to incorporate areas for all ages to enjoy. They are encourage wildlife, are safe and stimulating. We recognise that spaces may need to be adapted to ensure they are well used and suitable for all the local community to access and enjoy.

User: London Borough of Richmond Upon Thames

Support – the draft policy carries forward many of the requirements of the existing policy, and is generally aligned with LB Richmond's commitment to protecting and enhancing the borough's sports and recreational provision. It could benefit, however, from a greater distinction between the provision of dedicated sports facilities and more informal recreational provision. The requirement to provide both formal and informal provision (para 5.5.1) is worthwhile and can be seen to introduce greater flexibility, while also mirroring the approach and requirements of LP 31. However, this should not enable opportunities for developments to forego the provision of dedicated sports facilities, where these are appropriate, that meet the standards required by the NGBs and Sport England (see, in particular para. 5.5.1: "Many activities require minimal facilities, and often an open space or community hall can be sufficient"). This should also be considered in light of Policy S4, on 'Play and informal recreation', which is targeted at young people's recreational opportunities.

The inclusion of specific provision shortfalls in para 5.5.2 (swimming pools, artificial grass pitches, sports halls) could become out of date and is not considered necessary, as the broader point that 'unmet demand is projected to increase' remains relevant even without these sport specific references. The draft policy could be strengthened if reference were made to the availability of local and contemporary data in identifying shortfalls. I note, for example, that the current London Plan stated "Demand and supply for swimming pools will be broadly in balance London wide" – an aspect which has now been changed. More local specificity would improve this as a strategic policy.

User: London Borough of Harrow

The Policy is supported.

There are however fundamental challenges on this matter related to public sector funding! increased pressure due to population rises I opportunities for land for extensive new facilities which will place a greater reliance on provision on multi-functional artificial pitches. There may also be current restrictions on some facilities related to hours where additional lighting is not required. The policy could be amended to allow greater flexibility to assist in increasing capacity of facilities.

Paragraph (C) should also be amended to include reference to Policy G2: Londons Green Belt and G4: Local green and open space, to cover all circumstances where facilities maybe proposed on existing open space.

User: London Borough of Harrow

The Policy is supported (S5).

There are however fundamental challenges on this matter related to public sector funding! increased pressure due to population rises I opportunities for land for extensive new facilities which will place a greater reliance on provision on multi-functional artificial pitches. There may also be current restrictions on some facilities related to hours where additional lighting is not required. The policy could be amended to allow greater flexibility to assist in increasing capacity of facilities.

Paragraph (C) should also be amended to include reference to Policy G2: Londons Green Belt and G4: Local green and open space, to cover all circumstances where facilities maybe proposed on existing open space.

User:	Royal Borough of Greenwich

S5A(3) Support this new requirement for boroughs to maintain and promote the Walk London Network, as four of the networks (Jubilee Greenway, Thames Path, Capital Ring and Green Chain) have significant sections within Greenwich.

S5B Support the inclusion of additional criteria concerning accessibility and co-location

User: London Borough of Havering

Criteria A (1)

Havering supports the reference to the importance of sports and recreational facilities being assessed on both a local and sub-regional level.

Criteria B (2)

Havering supports the reference to encouraging the co-location of facilities. It can provide potential cost savings and better ‘joined-up’ delivery of services.

Criteria B (3)

Reference is made to potential difficulties with sports lighting. Sports lighting can be designed to minimise light spillage. Planning conditions can address this satisfactorily.

Paragraph 5.5.2

The draft London Plan refers to the shortage of swimming pools, artificial grass pitches and sports halls across London and that there is unmet demand.

The Mayor of London may wish to note that Havering is taking a very pro-active approach to addressing these issues.

- Havering opened a brand new swimming pool opening in Romford town centre this month (Sapphire Ice and Leisure).
- Havering is also investing an additional £29m through its leisure management contract in to refurbishing sports facilities including, subject to planning, building a brand new Hornchurch Sports Centre that will include a modern, fit for purpose new swimming pool, that ensures provision of a swimming facility for 50-60 years.
- Havering is working with the Football Association (FA) and the Football Foundation to look at increasing the number of 3G AGP’s in Havering.

User:	Rugby Football Union

The RFU consider that international and national stadiums, including Twickenham Stadium, play an important role in both access and promotion of sports as well as contributions to cultural value both in terms of sports played at the venue as well as the diversification of the stadia for concerts and other events. The RFU therefore supports paragraph 5.5.5 that states the “Specialist sporting venues and stadiums also have a role to play in providing facilities and enabling wider access to sport, as well having an important cultural value” (our emphasis). The RFU agrees with this point but would request that this should be included within the policy wording for Policy S5, rather than only be mentioned within the justification text.

User: Mr Joe Ward

A decline in the quality of use of sports facilities is often used as an excuse for allowing development of public open spaces which needs to be addressed in policy S5.

Proposed change:

S5 B(4) This should be amended to read: “ensure that there is no net loss of facilities. **If there is evidence that ongoing or future demand for sports means facilities are under-used measures should be taken to ensure demand is promoted through a local sports strategy or to repurpose the space for an outdoor sport for which there is demand.”**

Rationale: There is a cycle of decline in sports facilities, both green fields and hard courts, where underinvestment leads to under-use and this ultimately leads to the loss of those facilities. Currently the run-down ball courts on Shoreditch Park, for example, are due to be built on despite open air ball courts being at a massive premium in this central London area. Policies need to be framed to address this problem and recognise that demand for sports is uniquely tied up with available facilities and often the presence of clubs that promote them locally.

User:	London Borough of Enfield

Policy S5 looks at ‘Sports and recreation facilities’. Demand assessments should only take into account the affordability of sports and recreational facilities. The Plan fails to specify what standards new pitches should aim to achieve and what types of artificial grass pitches should be favoured. There isn’t enough information on sports lighting and the impact of these or those instances where sports pitches are accompanied by spectator areas. There is also little information on sports clubs wishing to expand their stadiums or look for sites elsewhere. This is important as it adds to London’s cultural offer.

User:	John Innes Society

S5 Sport
A. This policy should have the words “to meet future need” after the words “sufficient supply” in line one.

User: Inclusion London

Policy S5 Sports and recreation facilities

Deaf and Disabled people encounter complex physical, economic and attitudinal barriers that hinder and prevent them from getting involved in Sport and Physical Activity (SPA). This results in low rate of activity amongst Disabled people:

- 43% of Disabled people are inactive compared with 21% of non-disabled people
- Since 2012 the levels of physical activity among Disabled people have been decreasing.

Deaf and Disabled Peoples Organisations (DDPOs) across five London boroughs involved in the Into sport project funded by Sport England, led by Inclusion London found solutions to some of these barriers, which include DDPOs:

- Working with local SPA providers to create activities that are fully inclusive
- Helping to schedule disability-specific sessions at local venues, as a first step for some service users
- Supporting people to find specific activities that meet their needs
- Supporting local clubs or providers to apply for funding for specialist equipment and dedicated sessions
- Using local knowledge to help support service users with accessing and planning transport and travel
- Coordinating volunteers to accompany service users
- Encourage participants to support each other to get to activities[1]

However, funding is needed for DDPOs to continue this work.

Recommendation: The Mayor ensures that DDPOs are funded to continue the work to ensure that Deaf and Disabled people can access Sport and Physical Activities.

[1] https://www.inclusionlondon.org.uk/training-and-support/consortia-working/into-sport-consortium/yes-can-executive-summary/

User:	London Borough of Bexley

Part A(3) of **Policy S5 Sports and recreation facilities** states that boroughs will be responsible for maintaining and promoting the Walk London Network. This seems to imply that responsibility for these assets will transfer to the Council. If so, it is inappropriate for this decision to be made in and announced by a strategic planning document. There are three Walk London Network routes partially within Bexley: the Green Chain, the Thames Path and the London Loop. Currently, TfL maintains the London Loop. Shifting responsibility to the Council could create significant resource issues. Further detail should also be provided on what exactly is expected of boroughs, in terms of their responsibilities regarding signage, fencing, maintenance of the footway, graffiti removal, and other issues. There should also be greater certainty regarding the extent of the responsibility, including whether boroughs would be expected to maintain the routes only on public land or whether this would extend to parts of the routes where the land is in private ownership.

User: Kingston University

Policy S5 Sports and recreation facilities

The need for boroughs to assess and ensure there is a sufficient supply of good quality sports and recreation facilities is supported. Clause B2 notes that boroughs should “2) maximise the multiple use of facilities, and encourage the co-location of services between sports providers, schools, colleges and other community facilities”. Given the important role that universities can play in sport and recreation provision, the draft policy should be amended to refer to universities. It is therefore requested the policy is amended as follows:

“…B2) maximise the multiple use of facilities, and encourage the co-location of services between sports providers, schools, colleges, **universities** and other community facilities”. [our addition **in bold**]

User:	Mr Peter Davies

Informal and formal outdoor sports facilities, including for ball sports, should be protected and enhanced.

User:	London Healthier Places

The LHP Network strongly supports the provision of good quality sports and recreational facilities that are well maintained. Alongside this, the LHP Network strongly supports the promotion and enhancement of daily outdoor recreational activities and supports the development, maintenance and promotion of integrated walking and cycling routes for London – both for active travel as well as recreation.

User:	British Takeaway Campaign

The BTC welcomes the draft London Plan’s commitment to ensuring the sufficient supply of good quality sports and recreation facilities in order to encourage physical activity and to deliver a range of social, health and wellbeing benefits to London’s diverse communities.

The takeaway sector is proud of its economic impact – contributing almost £1.4 billion to the London economy in 2016, and supporting more than 23,000 London jobs – but its social and cultural contributions, including to London community, are equally important. More than two fifths of takeaways are actively involved in community-based activities, with 62% of these sponsoring local activities or sports teams, and 61% providing food to charities, care homes or local events. Amigos Mexican Takeaway in Holloway, for example, take part in charity bike rides such as the London to Brighton Bike Ride and the Virgin London Triathlon, while Tarka Indian Cuisine in Dagenham sponsors a local football club.

User: CPRE London

Outdoor sport and recreation facilities

A decline in the quality of use of sports facilities is often used as an excuse for allowing development of public open spaces which needs to be addressed in policy S5.

Proposed change:

S5 B(4) This should be amended to read: “ensure that there is no net loss of facilities. **If there is evidence that ongoing or future demand for sports means facilities are under-used measures should be taken to ensure demand is promoted through a local sports strategy or to repurpose the space for an outdoor sport for which there is demand.”**

Rationale: There is a cycle of decline in sports facilities, both green fields and hard courts, where underinvestment leads to under-use and this ultimately leads to the loss of those facilities. Currently the run-down ball courts on Shoreditch Park, for example, are due to be built on despite open air ball courts being at a massive premium in this central London area. Policies need to be framed to address this problem and recognise that demand for sports is uniquely tied up with available facilities and often the presence of clubs that promote them locally.

User: Zbig Blonski

Policy S5 – sports and recreational facilities

40.Actions and policies to support the provision of sports and recreational facilities are strongly supported however, there is a need for recognition that sports activities in particular play a very important role in maintaining the quality, public accessibility, use and the public safety of green open spaces including Metropolitan Open Land.

41.This is evident throughout London even in inner London boroughs. In many cases in order for outdoor sports to take place they require supporting facilities accommodated in buildings. Together with these there is also a need for buildings to accommodate sports activities directly related to outdoor sport for training purposes, practices and for enabling such sport participation to take place all the year round. For example indoor tennis, 5 a side football, hockey and gyms and swimming pools associated with the type of training that cannot be done outdoors. These facilities would not include provision for large-scale spectator accommodation.

42.Part C of Policy S5 states that the policy to determine appropriateness of facilities on existing open space should be the same for smaller nonstrategic open space as for Metropolitan Open Land. The functions and role of undesignated open land are different from MOL and should be treated differently as well.

43.However, there is conflict between this policy and paragraph 5.5.3 of the supporting text. This states that built sports facilities should only be accommodated on green open space if the area has been identified as surplus to requirements as per open space strategy whereas Part C of Policy S5 essentially states that such development would be acceptable as long as it did not amount to unacceptable development.

44.In addition to this conflict paragraph 5.5.3 is expressed as a policy.

45.This paragraph therefore should be deleted as it conflicts Part C of Policy S5.

User: Zbig Blonski

46.There is a strategic issue which for whatever reason has been totally overlooked and is a glaring omission from the Plan. This relates to sports stadiums. This is extraordinary in view that the Plan over extensive and over prescriptive coverage of issues. All there is a very brief reference in paragraph 5.5.5 and fleeting references to spectator sports elsewhere in paragraphs 7.5.1 and 7.6.1. However, there are many sports stadiums in London for cricket, rugby, hockey and football. They play an immensely important role in the London economy, its social and community life. Many of the clubs associated with these stadiums also have extensive sport inthe community schemes involving a wide age range. This promotes active participation in sport and healthy living as well as opening future career pathways. 47.There are currently 12 stadiums used for football league soccer inn London. Five of which are in the Premiership. In addition there are a further 5 in the National league and many more in the lower levels of the non league football pyramid and of course Wembley stadium.

48.Many of these football stadiums have had to face the issue of modernisation and changes in capacity to reflect current needs and provide for those in the future. Currently there are proposals relating to the stadiums of Tottenham Hotspur (under construction); Chelsea (planning permission 2017 for £500 million investment to expand capacity by 20,000 to 60,000); Fulham (current planning application); Crystal Palace (preapplication discussion); QPR looking for new stadium as is Brentford; AFC Wimbledon (planning permission for new stadium through enabling development after torturous 2 year planning application process); Millwall (various redevelopment issues relating to ground and surrounding area).

49.Most of the proposals dealing with sports stadiums have had to wrestle with a wide range of policies which are not directly related to such projects and it has resulted in difficulties for decision makers and communities adjoining such facilities.

50.As this is such an important part of the economy, social and community life there is a need for a clear policy supporting in principle developments for sports stadiums setting out relevant considerations to make sure that they are appropriate and acceptable in their location. It should address issues of supporting enabling development as well impacts on infrastructure especially public transport and car parking and the way other policies in the Plan would interact in their requirements with such proposals. For example if a stadium was being facilitated by enabling housing development should the full requirement or a different requirement for affordable housing apply.

51.In the past Government policy on acceptable uses on Green Belt in PPG17 recognised that sports stadiums could be appropriate as an openair activity.

52.The NPPF paragraph 89 also allows for this stating “provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it.”

53.The policy in the Plan should acknowledge the possibility for this on MOL and Green Belt where there are sound and beneficial community and environmental reasons for such development in sustainable and accessible locations.

User: Claire Mellish

A decline in the quality of use of sports facilities is often used as an excuse for allowing development of public open spaces which needs to be addressed in policy S5. Proposed change: S5 B(4) This should be amended to read: “ensure that there is no net loss of facilities. If there is evidence that ongoing or future demand for sports means facilities are under-used measures should be taken to ensure demand is promoted through a local sports strategy or to repurpose the space for an outdoor sport for which there is demand.”

User:	Canal & River Trust

A substantial length of the existing Walk London network is formed of some of the Trust's towpaths. We suggest that policy S5(A)(3) should also encourage the improvement of the Walk London Network. To ensure that this policy supports aims set out elsewhere in the plan (SI16), we suggest that this point of the policy is redrafted to state:

'maintain and promote, and where necessary improve, the Walk London Network shown on Figure 5.1 and encourage networks for walking, cycling and other activities'.

User:	London Wildlife Trust

We support Policy S5 in principle, given recognition that such facilities can, without sensitive design and location, can cause adverse ecological impacts; we welcome the inclusion of clause B3) and Part C).

User: London Wildlife Trust

However, given the rise in the number of artificial pitches (as set out in para 5.5.2 Current provision of […] artificial grass pitches (AGPs) […] is not meeting demand…) being installed we remain concerned that the accumulative impacts of this – for example on surface water management and biodiversity – has not been recognised. In our view AGPs should be treated as contributing to a net loss of greenspace and their installation needs to be mitigated for that loss of green space in any sports development proposal. We recommend a specific clause under Part B to this effect is added:

B Development proposals for sports and recreation facilities should:
5) ensure that there is no net loss of the environmental functions of green space through the installation of artificial grass pitches

User:	Brixton Society

S5 Sports and Recreation: Overall this policy is welcomed. However, in clause C, there should be stronger safeguards for existing open space from encroachment by specialist sports buildings or facilities. After all, green open spaces are beneficial to a wider section of residents by age or ability – quiet or informal recreation needs to be given more weight. Landscape quality and biodiversity should also be taken into account.

User:	West London River Group
S5A Given the range and extent of participation in water?related sports, water?sports should be specifically mentioned.	

User:	West London River Group

The Thames Path is one of the key walks in the Walk London Network. It is the only route that crosses London following the River Thames and should, therefore, be mentioned specifically and there should be unrestricted access.

User: Mr Paul McQuillen

A decline in the quality of use of sports facilities is often used as an excuse for allowing development of public open spaces which needs to be addressed in policy S5. **Proposed change**: S5 B(4) This should be amended to read: “ensure that there is no net loss of facilities. **If there is evidence that ongoing or future demand for sports means facilities are under-used measures should be taken to ensure demand is promoted through a local sports strategy or to repurpose the space for an outdoor sport for which there is demand.”**

User:	Clive Prior
Informal and formal outdoor sports facilities, including for ball sports, should be protected and enhanced.	

User:	Glynis Neal
Informal and formal outdoor sports facilities, including for ball sports, should be protected and enhanced.	

User:	London Travel Watch

It is noted that the Walk London Network is safeguarded. This is welcome; however, there is no policy support for the development of additional long distance walking routes.

There are still many locations where pavements do not exist, there are no dropped kerbs or crossovers, pavements are too narrow, pedestrian crossings unavailable or not at the locations pedestrians would want them. Sometimes there are physical barriers to comfortable and direct walking. There should, therefore be policies to ensure these deficiencies are rectified when development takes place.

The roll out of Legible London should be supported by a policy. It should specifically promote the map-based wayfinding signs, rather than the finger posts that have been allowed to proliferate over the last few years, contrary to the original concept of the scheme.

All streets should have street nameplates in an appropriate location.

User:	Paul Benedyk
Informal and formal outdoor sports facilities, including for ball sports, should be protected and enhanced.	

User:	London Borough of Newham

Policy S5 Sports and recreation facilities

LBN are generally supportive of the policy which is complementary to Newham's Draft Revised Local Plan.

However, the issue of the loss of facilities should link back to points F and G in Policy S1 Developing London's social infrastructure. This will ensure that any loss of sports or recreation facilities is manged effectively

User:	London Borough of Sutton

SUPPORT. The London Borough of Sutton broadly supports Policy S5 Sports and recreation facilities, and would welcome reference to policies for all open space, not only to Policy G3 Metropolitan Open Land. In addition, reference to the Walk London Network might better sit with Policy T2 Healthy Streets and policies for green infrastructure.

User:	Jonathan Rooks
Informal and formal outdoor sports facilities, including for ball sports, should be protected and enhanced.	

User: Ms Deirdre Woods

7: FOOD HUBS

Food production hubs can play a useful role within the city. These might be integrated light industrial developments which involve food growing, local food processing and markets based upon these which provide alternative food systems not subject to the whims of large industry. Food hubs can act as a distribution point for small-scale agroecological producers, provide opportunities for SMEs and start-ups, provide good food for all, act as community centres, and provide education, training and jobs. Even imported foodstuffs obtained from regional wholesale centres can be processed in these food hubs. Food hubs can provide social spaces as well as job opportunities which are connected to a range of cultural understandings of what a lifetime neighbourhood means in practice.

The promise of community food hubs has been highlighted in reports such as “Community Food Hubs: Helping make Edinburgh a Sustainable Food City” by The University of Edinburgh and “Good planning for good food: How the planning system in England can support healthy and sustainable food” by Sustain. Food hubs are being promoted in other cities. It is vital that these initiatives are supported through the planning system in London.

In relation to E9.B:

We suggest the addition of a 10th pt:

In Development Plans, boroughs must 10) support the establishment and continued existence of community food hubs as sites which combine spaces for the growing, preparation and eating of healthy foods in an inclusive environment alongside distribution points for small-scale agroecological community produced food.

I feel this needs designing into the sections on health and social care facilties (S2), education and childcare facilities (S3), sports and recreation facilities (S5) and suggest the following policies:

In development plans and in planning decisions, boroughs must:

1. Encourage the start-up of food hubs which are located in Town Centres which work in partnership with schools and colleges to encourage food based businesses by offering training skills in food growing, marketing and distribution as well as environmental management, managing food waste, and addressing food poverty, providing a variety of skills to encourage localised, self-reliant development within each borough, but also facilitating advantageous cross borough connections which can benefit London as a whole and households across each region.

2. Develop strategic partnerships between public health initiatives, community food hubs and social prescribing to optimise benefit to local communities in terms of well-being, improved mental health and social enterprise.

User: The London Playing Fields Foundation

We recommend the inclusion of playing fields in the text of Policy S5

Policy S5 Sports and recreation facilities

A To ensure there is sufficient supply of good quality sports and recreation facilities, boroughs should:

1) regularly assess the need for sports and recreation facilities **including playing fields** at the local and sub-regional level

2) secure sites for a range of sports and recreation facilities

3) maintain and promote the Walk London Network shown on Figure 5.1 and encourage networks for walking, cycling and other activities.

B Development proposals for sports and recreation facilities **including playing fields** should:

1) increase or enhance the provision of facilities in accessible locations, well-connected to public transport and link to networks for walking and cycling

2) maximise the multiple use of facilities, and encourage the co-location of services between sports providers, schools, colleges and other community facilities

3) support the provision of sports lighting within reasonable hours where there is an identified need for sports facilities and lighting is required to increase their potential usage, unless the lighting gives rise to demonstrable harm to the local community or biodiversity

4) ensure that there is no net loss of facilities, **including playing fields**, unless it can be demonstrated that there is no ongoing or future demand.

C Where facilities are proposed on existing open space, boroughs should consider these considering policies on protecting open space (Policy G3 Metropolitan Open Land) and the borough's own assessment of needs and opportunities for sports facilities, and the potential impact that the development will have.

Facilities providing places to play, **particularly playing fields** lie at the heart of sustained participation along with the need to invest in their improvement and effective management. Longer term protection is required to address a historic lack of political recognition of the wider health and social benefits of well managed playing fields.

Balance between the need for more housing and playing field provision.

For this to happen there needs to be a clear understanding of housing requirements in an area and crucially reference should also be made about the provision of sport, recreation and play facilities to service the people who will live in the new housing stock. The creation of new green spaces or playing fields may in some urban environments not be possible, but where appropriate this should be a consideration when planning new housing developments.

LPFF strongly advocates that the protection and improvement of playing fields is vital and that attention needs to be drawn to the replacement of like for like or improved facilities if they are lost to development. The situation in London is compounded by the need to find space to build 649,350 new homes over the period 2019-2029.

The Mayor's priority is to tackle the housing crisis but through the draft London Plan he also has a responsibility to manage the tension between protecting London's playing fields and increasing development.

It is not only the supply of playing pitches in London that is an important consideration but access to facilities. Reference to better public health, social cohesion and more responsible social attitudes brought about by the sporting experience is required along with a recognition that playing fields deliver multiple outcomes.

We are also surprised that there is no reference to the **Olympic legacy from 2012** which had the stated intention of inspiring a generation to take up sport and be more physically active. For this to happen there need to be places to deliver the variety of sport and physical activity programmes that will result in multiple outcomes such as social cohesion, crime reduction and healthier, happier local communities.

The current trend of promoting Active Travel through walking and cycling initiatives should be encouraged. In addition, making better use of playing fields and open spaces is a low cost-effective option.

Public access to major pitch sports grass pitches in London

Type	Private	Public Access	Not Known	Total
Cricket	138	546	0	685
Full sized Football	287	1669	1	1957
Hockey	23	16	0	39
Junior Football	324	723	1	1048
Junior Rugby Union	37	62	0	99
Mini Rugby	1	23	0	24
Mini Soccer	132	486	0	618
Nine v Nine	3	33	0	36
Senior Rugby Union	124	379	0	503

Total	1069	3937	2	5008

Better access to playing fields on school sites

The rationalisation of playing pitches and the distribution of sport and recreation facilities should also take account of facilities on school sites that are often unavailable for community use. One of the recommendation from the 2006 Offside Report was to provide better access to school facilities and this remains pertinent today.

In fact, the situation is exacerbated by local authority planning for the development of school sites to accommodate a rising school population. Safeguards will need to be employed to ensure that whilst schools are a community resource and may be open to the wider community outside the normal school day, building on school playing field that result in a loss of playing pitches is unacceptable.

Within section B4 there is also a lack of clarity in referencing sport and recreation facilities. Playing Fields are not specifically mentioned and this needs to be rectified. We would suggest including along with the mantra of **NO NET LOSS OF PITCHES**.

User:	The London Playing Fields Foundation

Sport and recreation facilities are important components of social infrastructure. Both formal and informal facilities should be provided, to encourage physical activity and deliver a range of social, health and wellbeing benefits to communities. People take part in various forms of sport and recreation which require different types of facility. Many activities require minimal facilities, and often an open space, **playing field or** community hall can be sufficient, **especially in inner London boroughs**.

Two fundamental questions remain:

How can we increase opportunities for sport, play and informal recreation if we do not protect and provide places where this activity happens?

How does the draft London Plan take into consideration the relative shortage of playing fields in London and their uneven distribution?

User:	London Borough of Ealing

Clarity is sought. Why single out Policy G3? Other policy designations such as Green Belt and Public Open Space might also accommodate facilities for recreation/sports.

User:	Landscape Institute London

LI London supports the policies and clauses in this section and supports the continued recommendation to protect existing playing fields and to provide a good range of formal and informal sports activities such as healthy walking and outdoor gyms. The latter should be designed to work in association with development of other London Plan policy recommendations including green infrastructure, pedestrian and cycle routes and access to wildlife.

User:	Landscape Institute London

5.5.2 - LI London is concerned greenspace may be lost to the provision of Artificial Grass Pitches (AGPs) in public parks and recreation grounds. These pitches are often floodlit and fenced for organised fee paying sports, despite often being in public parks. This leads to a reduction in available free to use playing fields and a loss of greenspace, as artificial turf is synthetic.

User: Eastcote Hockey & Badminton Club

Given the urban nature of London there will always be difficulty in identifying ideal spaces for the construction of AGPs. Priority needs to be given to the construction AGPs on existing sports and recreation sites and other green space areas as this greatly increases the capacity of use that the community can take advantage of.

The plan states

"Built sports facilities should only be accommodated on green open space if that area has been identified as surplus to requirements as per an open space strategy"

The construction of AGP's should not be treated as a loss of open space but as an increase of open space and should not be regarded as a "Built sports facility" in the context of the above sentence in the Plan..

User:	Natural England
5.5.2 Replacement of grass pitches with artificial grass pitches could impact on the function of GI in some areas. In such cases, the margins and boundary areas should be designed and managed to mitigate for this by providing biodiversity, flood alleviation or other benefits depending on the context.	

User: Fulham Football Club

Unfortunately, the Draft New London Plan as drafted fails to acknowledge elite performance sport or provide any policy support for either the protection or need to improve and enhance facilities so as to ensure that professional sports, and the facilities that it needs, can remain at the forefront of sporting innovation and excellence both nationally and internationally. Policy ‘S5 Sports and Recreational Facilities’ fails to plan positively or strategically for elite performance sport and should be amended to include a new criterion dealing with elite performance sport as follows:

“London is a centre of excellence for elite performance sports. The needs and requirements of elite performance sport differ from those of amateur and community sport and such differences should be acknowledged when considering development proposals. The London Plan supports the provision and enhancement of elite performance sports facilities to meet the needs of sports, Clubs and athletes to ensure that London maintains its position as a pre-eminent location for elite performance sport both nationally and internationally.”

Policy 4.6 ‘Support for and enhancement of arts, culture, sports and entertainment’ of the adopted London Plan sought to support professional sport as well as amateur and community sport. There is no logical reason or justification why the Draft New London Plan does not contain a similar policy. The omission of such a policy is to the detriment of elite performance sport.

Elite performance team sports require large sites to accommodate the number of pitches/training areas required for training of professional and development teams while allowing for adequate pitch rotation to ensure the maintenance of quality playing surfaces. The evolution of professional sport over the last 20 years has also seen significant strides made in sports science and youth development, which now necessitates significant built facilities to support the training elite performance athletes. This has led to a further divergence between the facilities required for elite performance sports and those required for amateur and community sports. The London Plan fails to acknowledge or support the specific and unique requirements of elite performance sport. It is considered that the London Plan fails to plan positively or strategically for elite performance sport and the evidence base has failed to consider the strategic needs of elite performance sports in terms of either venues or training facilities. In addition to amending Policy S5 there should be a specific policy similar to Policy 4.6 of the adopted London Plan that strategically supports elite performance sport.

User: London Friends of Greenspaces Network

19. S5 A decline in the quality of use of sports facilities is often used as an excuse for allowing development of public open spaces which needs to be addressed in policy S5.

Proposed change: S5 B(4) This should be amended to read: “ensure that there is no net loss of facilities. If there is evidence that ongoing or future demand for sports means facilities are under-used measures should be taken to ensure demand is promoted through a local sports strategy or to repurpose the space for an outdoor sport for which there is demand.”

Rationale: There is a cycle of decline in sports facilities, both green fields and hard courts, where underinvestment leads to under-use and this ultimately leads to the loss of those facilities. Policies need to be framed to address this problem and recognise that demand for sports is uniquely tied up with available facilities and often the presence of clubs that promote them locally.

User:	Hornsey & Wood Green Labour Party

A decline in the quality of use of sports facilities is often used as an excuse for allowing development of public open spaces which needs to be addressed in policy S5. Proposed change: S5 B(4) This should be amended to read: “ensure that there is no net loss of facilities. If there is evidence that ongoing or future demand for sports means facilities are under-used measures should be taken to ensure demand is promoted through a local sports strategy or to repurpose the space for an outdoor sport for which there is demand.”

User:	London Waterkeeper

Please include plans for swimming in the River Thames. Other cities have made their waters swimmable. London Waterkeeper sets this out on our website http://londonwaterkeeper.org.uk/a-thames-fit-to-swim

User: London Parks and Gardens Trust

Policy S4 and S5

In recommending this wording above for Policy S3 B 8, the Trust notes that both policy S4 and S5 mention off-site provision. For both off-site and on-site provision we recommend that consideration be given to the quality of the design of these spaces. If play space is not well designed, play-areas can have quite an impact on the character and visual amenity of historic landscapes and other open spaces, adding clutter in the form of brightly coloured equipment, fencing, gates and CCTV etc. This is compounded in smaller open spaces. The Trust particularly welcomes Policy S4, para B 2,d) incorporating trees and/or other forms of greenery into play schemes.

User: Support Oakfield Society

Oakfield – Green Belt – Social Infrastructure - Sport

Oakfield is a cherished Green Belt site, an important part of the borough's social infrastructure and is listed as an Asset of Community Value. In spite of this, it can be lost and lost forever unless the new London Plan strengthens its inclusive community, Green Belt and Social Infrastructure objectives. It can do this, and should do so, by insisting that boroughs must not de-designate Green Belt sites if they are being used purposively. **Policies in GG1, S1, S4, G1 and G4 should be informed by the principle, "if you use it, you won't lose it"**.

Oakfield comprises an area of largely open land primarily used as grass playing fields with 12 adult and 7 youth football pitches and 4 cricket squares. The Redbridge Sports Centre has a dozen hard surface courts and multiple health facilities. All is of a high quality, well maintained and intensely utilised. Sport England and LBR have described the grass pitches as the best in Redbridge. The whole extends to 63 acres of designated Green Belt. It is significant for the London SHLAA that the total space exceeds 25.5 hectares. (It was a mistake to include Oakfield in the housing targets in **Policy H1** and **Table 4.1** because it has not been dedesignated. This is discussed below.)

The two sports pavilions are intensively used by community and religious groups, public services, and provide venues for various social functions. In addition to the obvious contribution to the social infrastructure made by the sports organisations, the pavilions thus form a valuable place in the social architecture of Redbridge in their own rights.

Oakfield is situated very close to existing residential development and is easily accessible from Fairlop Tube Station and Barkingside High Street bus stops. It is, therefore, in a highly sustainable position.

User: Support Oakfield Society

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User: Support Oakfield Society

New London Plan threatens the Green Belt and Sports Fields

The new London Plan should demonstrate clearly that protection of existing Green Belt is a primary target (not just an 'aim'). In spite of the warm words contained in **Policy GG1 (Building strong and inclusive communities)**, which we applaud, the new London Plan re-opens the door for Councils to
conduct more reviews of Green Belt boundaries while paying scant attention to social infrastructure (including sports and recreation facilities).

Our concerns revolve around the difference between **MUST** and **SHOULD**. Whereas boroughs ***should*** value their green spaces and social infrastructure they ***must*** deliver more housing. Our experience of the LBR Local Planning process is that Green Belt boundaries are reviewed with the aim of reducing green spaces (rather than an objective assessment against the tests in the NPPF). In addition, social infrastructure is hardly addressed at all, in spite of the diversity and inequalities found in London. The new London Plan does address those issues at length but weakly compared to the starkly stated numerical numbers for housing growth.

Hence the new London Plan does make policy statements in favour of protecting Green Belt spaces and encouraging social infrastructure ***but***: ? **Policy H1 (Increasing housing supply) and Table 4.1** contain revised 10 year targets for net housing completions (2019/20 – 2028/29) that "*Boroughs **must** include . . . in their Development Plan documents". This will encourage Councils to review their Green Belt boundaries because there is nothing in the London Plan to proscribe this.*

This is because green and social infrastructure are framed in a non-mandatory, weaker idiom:
? For example, the talk of "***aims*** *to accommodate . . growth . . without intruding on . . Green Belt*" in **Spatial Development Policy SD3, 2.3.1** and
? repeated used of "***should***" in **Policies S1 (Developing London's social infrastructure)**, and **S5 (Sports and recreation facilities)**.
? **Policy G1 (Green infrastructure), A** *London's network of green and open spaces, etc., . . . **should** be protected . . . . **B** Boroughs **should** prepare green infrastructure strategies . . . for sport and recreation. **C** Development Plans and Opportunity Area Planning Frameworks **should** : 1) identify key green infrastructure assets. . . . 2) identify opportunities . . . through strategic green infrastructure interventions.*
? **Policy G2 (London's Green Belt)** is also weak. It says, **A** ***The Green Belt*** ***should*** *be protected from inappropriate development:*
? *development proposals that would harm the Green Belt **should** be refused*
? *the enhancement of the Green Belt to provide appropriate multifunctional uses for Londoners **should** be supported.*
? ***B*** *The extension of the **Green Belt** will be **supported, where appropriate [!!]**. It' s dedesignation will not. [Note: It's '**Its**' not '**it's**]*

It is not right that having gone through the full rigours of Local Planning over the lengthy period from the 2008 Core Strategy Review through multiple full Local Council debates on the evolving proposals, the full procedures of public questions, deputations and open consultations, Planning Inspector hearings as appointed by the Secretary of State and multiple Main Alterations to the Local Plan leading to a settled 15 year Local Plan, that the new London Plan should now provide Borough Councils with opportunities to resurrect Plans that have only just been found to be unsafe.

We are very concerned that LBR has a history of commissioning successive so-called independent reports on both Green Belt boundaries and Sports facilities until they obtain the outcomes they want.

Furthermore, to rub salt into the wound, the new London Plan grounds the mandatory housing targets in *Policy H1 (Increasing housing supply) and Table 4.1 contains revised 10 year targets for net housing completions (2019/20 – 2028/29)*. The statistics in this Policy differ significantly from those produced only a few years ago in the 2015 Plan which indicates the dangers inherent in long term projections. This current round precedes the outcome of Brexit negotiation which may well alter London's future population trajectory. Furthermore, not much progress at all has been made with regard to collaboration on the rest of the South
East planning. Not least, Table 4.1 was published prior to the latest international migration data published on 22nd February just gone.

We believe there should be a moratorium on any change in Green Belt boundaries until after the outcome of the Brexit negotiations is known and understood. Meanwhile, ten-year projections of population and housing needs must be treated with a high degree of circumspection. When Green Belt and sports and recreation fields are lost, they are lost forever. That is bad enough. When they are lost due to long term projections that can be worrying. When the long-term projections are questionable that is tragic.

Our detailed suggestions and comments on policy wordings in the draft London Plan are attached – "**Comments on the wording of the draft London Plan**".

We reflect on the population projections and housing targets in our **APPENDIX – "Housing targets in the new London Plan**". This is also attached.

User: Support Oakfield Society

Policy S5 Sports and recreation facilities

In order to ensure there is sufficient supply of good quality sports and recreation facilities, boroughs *should*: [*Replace with 'must'. Reason: the sports and recreational dimension of sustainable development is so important that not to undertake a needs assessment (e.g. as a Playing Pitch Strategy approach) would*
render a Local Plan unsafe.]
1) regularly assess the need for sports and recreation facilities at the local and sub-regional *level [Add: 'in a Playing Pitch Strategy as ;aid down by Sport England.' Reason: this is the best way to undertake the exercise in a way that is authoritative.*

Development proposals for *sports [Add: ', sports fields and . . .' Reason: Sport England define sports fields as all the field and not merely the pitches used for the sport.]* and recreation facilities should:
4) ensure that there is no net loss of facilities, unless it can be demonstrated that there is no ongoing or future demand.*Add: ['for good quality and accessible*
facilities that will attract participation.' Reason: poor quality facilities, facilities in difficult to access locations and poorly managed facilities act as a deterrent that inhibits participation. This gives a false impression of the level of true demand.]

User:	Support Oakfield Society
5.5.4 Up-to-date playing pitch strategies *can [Replace with “must”]* be used to protect and enhance the use of existing playing fields and help to plan for where more are needed. Sport England provides guidance	

User: Parkview International Ltd Group of Companies

Policy S5 Sports and recreation facilities

We consider that the policy does not take into consideration whether land required for the provision of sports and recreation facilities is in private or public ownership. This is an important distinction in order to deliver the Borough's identified sport and recreation needs.

The draft policy also makes the implicit assumption that all land either in or previously used as sports and recreational use should continue to be in sports and recreational use – including associated redundant buildings associated with that use.

The policy also needs to recognise that there may be "very special circumstances" which outweigh the harm for the partial development of Metropolitan Open Land which may have previously been in outdoor sport and recreation use. There may also be "exceptional circumstances" for Borough's to review existing MOL boundaries in order to help meet their Local Plan's development needs.

We therefore recommend the following changes to the policy and associated changes to the supporting text.

Recommended Changes to Draft Policy S5: Sports and Recreation Facilities

1. In order to ensure there is sufficient supply of good publicly accessible quality sports and recreation facilities, boroughs should:

Delete sub section 2 to read:

Work in partnership with landowners and provides to deliver the identified need for the range of sports and recreational facilities.

Amend C to read:

Where facilities are proposed on existing public open space, boroughs should consider these in light of policies on protecting open space (Policy G3 Metropolitan Open Land) and the borough's own assessment of needs and opportunities for sports facilities, and the potential that the development will have.

Where land and buildings for sports and recreational facilities in MOL are no longer in use Boroughs need to assess within the Local Plan making process whether there are “exceptional circumstances” warranting a review of the MOL boundary. (Policy G3).

“Very special circumstances” will also need to be demonstrated for inappropriate development with the Green Belt (Policy G2 London’s Green Belt) and MOL (Policy G3 MOL).

User: Polly Chivers

I am thankful the open green spaces we currently enjoy in West London but I am writing to respond to the draft London Plan consultation. I am pleased that the draft recognises the importance of green spaces but policies need to be stronger to give them adequate protection, in particular:

- Informal and formal outdoor sports facilities, including for ball sports, should be protected and enhanced.

User:	London Borough of Camden

Criterion b (4) - For consistency with the overarching approach to social infrastructure set out by S1, this policy should acknowledge that there may be opportunities for co-location/clustering of facilities and it may not always be viable to retain existing provision in its current form.

User:	London Borough of Camden

“Many activities require minimal facilities, and often an open space or community hall can be sufficient” – while this may be true, they will normally need to be of a reasonable size and quality to ensure they are viable and fit for purpose over the long-term. Camden expects developers to provide detailed information showing a new community hall or public open space plan to show how a facility is intended to be used and operate. Generally, facilities should deliver a range of benefits and be multi-functional.

User: Mrs Alona Sheridan

A decline in the quality of use of sports facilities is often used as an excuse for allowing development of public open spaces which needs to be addressed in policy S5.

Proposed change: S5 B(4) This should be amended to read: “ensure that there is no net loss of facilities. **If there is evidence that ongoing or future demand for sports means facilities are under-used measures should be taken to ensure demand is promoted through a local sports strategy or to repurpose the space for an outdoor sport for which there is demand.”**

User:	Blanche Cameron
Informal and formal outdoor sports facilities, including for ball sports, should be protected and enhanced.	

User:	Blanche Cameron

A decline in the quality of use of sports facilities is often used as an excuse for allowing development of public open spaces which needs to be addressed in policy S5. **Proposed change**: S5 B(4) This should be amended to read: “ensure that there is no net loss of facilities. **If there is evidence that ongoing or future demand for sports means facilities are under-used measures should be taken to ensure demand is promoted through a local sports strategy or to repurpose the space for an outdoor sport for which there is demand.”**

User: HGH

Policy S5 Sports and recreation facilities

Paragraph 5.5.5 of the New Draft does acknowledge that specialist sporting venue and stadiums have a role to play in providing facilities and enabling wider access to sport, as well as having an important cultural value. However, this should go further to acknowledge that these facilities are essential in delivering professional sport in London and their retention and enhancement should be encouraged. Furthermore, it should also acknowledge that these facilities, particularly training grounds, take up large areas with sports pitches and associated buildings, often in London's Green Belt or Metropolitan Open Land (MOL), that are essential to the function of the clubs and that need to be maintained and enhanced to ensure the successful operation of each club.

Draft Policy S5 itself fails to acknowledge the importance of professional sport and the role it plays. As such, the Draft Policy S5 should be amended as follows:

Category A – the first sentence should be amended to include the words in bold italics:

In order to ensure there is sufficient supply of good quality sports and recreation facilities **for all levels from professional sport through to the grass roots levels**, boroughs should: …

Category B should include a new sub-category:

***) recognise the importance of professional sport in London and seek to promote facilities and an environment where it can continue to thrive.**

Category C should be amended to include the following wording at the end of the existing paragraph:

…balanced against the 'very special circumstances' that could arise from the need for the facilities, their importance for promoting either professional or grass roots sport and the benefits that can arise for promoting development in that location.

User:	London Beekeepers' Association

We also support initiatives to better connect people with nature, as in Policy S5 - Sports and recreation facilities, e.g. the Walk London Network.

User: Sport England

Sport England supports the inclusion of a policy that seeks to ensure a sufficient supply of good quality sports and recreational facilities. However, in addition to assessing the need, Boroughs should also be encouraged to produce strategies to plan how they will plan to meet this need. The Core Planning Principles stated in NPPF, paragraph 17, requires plan making to "*take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs".* Also, paragraph 73 not only requires an assessment of need but that this assessment should be used to determine what open space, sports and recreational provision is required, i.e. a strategy. The following text, therefore, should be added;

'4) Prepare a strategy setting out how the local authority will work with partners to deliver improvements to existing sports facilities and provide new facilities to support the increase population'.

Sport England is further concerned that this policy together with Policy S1 and G4 are not sufficient to protect all sports facilities that are at risk from development, without additional changes. There are many ageing sports facilities across London that have suffered from a lack of investment but continue to meet the needs of residents. There are more that could be brought back into use through further public sector investment. To provide sufficient protection for these facilities (and in accordance with paragraph 74 of the National Planning Policy Framework) Sport England requires the following revisions (or similar) to the text;

'C Proposals that result in a loss of sport and recreation facilities should be refused unless;

- A Local Authority playing pitch strategy or built sports facility strategy clearly shows that the sports facility is surplus to requirements.
- The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- The development is for alternative sports and recreational provision, the needs for which clearly outweighs the loss'.

Sport England objects to Policy S5 B (2); it will not be practical for all new development proposals for sport and recreation facilities to 'maximise the multiple use of facilities and encourage the co-location of services',

The text should be amended as follows;'*Where it is practical to do so XXXXXXXX encourage the co-location of services between sports providers, schools, colleges and other community facilities.'*

As set out in our comments in relation to Policy D12, Artificial grass pitches (AGPs), Multi Use Games Areas (MUGAs) and courts are a key part of the modern sporting landscape and provide valuable facilities for local communities. Sports lighting increases the hours of use a facility is available to the community and in some cases the commercial hire of facilities during the evening and/or weekend will help to secure the future viability of the facility, as without regular maintenance and replacement of the carpet or surface at the end of its lifecycle, facilities may have an uncertain future. Sport England would welcome amendments to the text to seek to encourage sports lighting whilst giving consideration to neighbours and biodiversity. For example the following text should be deleted; *'…but efforts should be made to minimise the impact on surrounding areas, and to not cause a demonstrable harm to the local community or biodiversity, the hours of use of lighting should be agreed early in the process.'*

And replaced with the following text;

'In locations where there is the potential for harm to Sites of Importance for Nature Conservation (SINC) or the proposed sports facility is next to existing residential development the Local Planning Authority should require a floodlighting assessment and/or acoustic assessment where there are reasonable grounds to request this. Sport England provides further guidance on planning for sports lighting.' The following documents could be referenced in the footnote;

- Artificial Grass Pitch (AGP) Acoustics - Planning Implications 2015

- Artificial Sports Lighting Design Guide 2012

As an example, research by the Lawn Tennis Association has told us that London equates for 20% of the national participation in tennis. Within London, 44% of the people who picked up a racquet in 2017 played in a park (the national average is 33%) and this shows the importance of retaining and providing new floodlit courts within parks to increase opportunities for sport and physical activity and deliver the associated health benefits. The Lawn Tennis Association's (LTA) research has found that in some London Boroughs there is no access to floodlit tennis courts on a pay and play basis and has found this has had a detrimental impact on participation. As part of the LTA's investment programme 'Transforming British Tennis Together' the LTA are working with local authorities and other partners to increase the number of floodlit courts and indoor courts in London to increase participation in tennis.

Finally, in relation to Policy S5(C) please also see Sport England's comments in relation to Policy G3 and 5.5.3

Policy S6 Public toilets

User:	London Borough of Wandsworth

The principle of the policy is supported as there has been significant closures of accessible public toilets across London this has had detrimental impacts on the elderly, those with disabilities and parents with young children. However, the Council questions the strategic nature of this policy.

User:	London Borough of Richmond Upon Thames

The principle of the policy is supported as there has been significant closures of accessible public toilets across London this has had detrimental impacts on the elderly, those with disabilities and parents with young children. However, the Council questions the strategic nature of this policy.

Provision of public toilets in ‘large scale commercial development’ is considered to be overly prescriptive. Richmond has successfully implemented a voluntary Community Toilet Scheme, and it is not necessary to set out planning requirements in a strategic plan for London. Ultimately, the provision of public toilets should be a matter for Local Authorities.

User: McDonald's Restaurants Ltd

We believe there are not enough free publicly-accessible toilets in London and this has an adverse impact on local communities, impacting the public realm and leading to anti-social behaviour.

We welcome the Draft Plan’s proposal to push for more, free publicly-accessible toilets in the city.

Many of our toilets are open to all members of the public. We are also one of few night time premises that offer this service and, given the fact we are located in some of the busiest parts of the city, we are helping to keep London clean.

User:	London Borough of Harrow
The Policy is supported.	

User:	Royal Borough of Greenwich
Support the provision of safe accessible public toilets that meet the needs of all members of the community.	

User: Rooms of our Own

Policy S6 Public Toilets

i. Rooms of our Own, together with many other toilet campaigners, would like to see a statutory obligation for local authorities to provide free, safe, accessible, clean public toilets 24/7. It is inadequate to rely on businesses to provide these.

ii. Lack of facilities leads to many people's lives being unnecessarily restricted

iii. Lack of facilities leads to street urination and defecation

iv. Lack of facilities is off-putting to potential visitors

v. RE 5.6.3. Planners are welcome to provide gender-neutral toilets should they wish. However it is vitally important that segregated toilets are also provided for women who face dangers where men are allowed to use the same facilities.Planners need to understand the difference between sex and gender. Sex is biological and cannot be changed. We make gender up … it changes all the time. Women are fearful of using toilets where men who self-identify as the opposite gender may be present.

vi. Unisex toilets should be provided for families with suitable nappy changing and children's height basins.

vii. We welcome the recommendation for Changing Places toilets

User:	London Borough of Enfield

Policy S6 focuses on ‘Public Toilets’. It needs to reference the British Standards for the provision of toilets and to provide clearer guidance on how the Plan will work with local community toilet schemes. There is no reference to delivery mechanisms, it lacks a spatial element and does not relate to types of spaces. It fails to recognise that that there may be sufficient supply of public toilets nearby, fails to define what is meant by ‘large scale’ development and fails to specify quantum’s and sizes of the types of toilets required.

User:	Inclusion London

Policy S6 Public toilets

We welcome the proposals for a range of toilets facilities in the Draft London Plan.

User: Just Space

Policy S6 Public toilets

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

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

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

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

User:	London Healthier Places

Public Toilets are essential facilities, especially for older residents/visitors, families with young children and people with disabilities. Not knowing whether a public toilet will be available if needed may discourage some people from leaving their properties and move on foot/cycle. The LHP Network strongly supports this policy, including the proposed "changing places" toilets. Toilets should be fully accessible, safe, well lit and maintained.

User:	NHS England

Evidence reflects that older people, vulnerable groups and those with children are more likely to leave the house if they have confidence that there is provision of public toilets. These population groups are more likely to have health issues caused or worsened by physical inactivity

User: Revo

We support the policy proposal that large-scale commercial developments, such as shopping centres, leisure facilities and large areas of public realm, should provide and secure the future management of free publicly-accessible toilets. We also agree that facilities should be suitable for all who use them, including disabled people and families with young children. Ensuring that public places have such facilities will help maintain an area's vibrancy, as it will give everyone the confidence to move around the area and dwell in these large-scale commercial developments.

Local Authorities have a critical role to play where there is fractured ownership in an identifiable area where such services maybe required (e.g. high streets) but not mandated by virtue of the smaller buildings and businesses that occupy them but could not / would not be able to afford them alone. We would also once again signpost to our Accessible Places Toolkit.

User:	British Property Federation

We support the policy proposal that large-scale commercial developments, such as shops, leisure facilities and large areas of public realm, should provide and secure the future management of free publicly-accessible toilets. We also agree that facilities should be suitable to disabled people and families with young children. Ensuring that public places have such facilities will help maintain an area’s vibrancy, as it will give individuals the confidence to move around the area and spend longer in these large-scale commercial developments.

User:	Living Streets
We support policy S6.	

User:	Brixton Society

S6 Public Toilets: Brixton Town Centre is suffering from the absence of such provision, particularly for beyond the traditional working day to cope with the demands of the 24-hour economy, resulting in public health risks and a degrading environment. Therefore this policy is strongly supported. *See also our comments under **HC6** below.*

User: Silvertown Homes

The London Plan seeks ‘large-scale commercial developments that are open to the public’ to accommodate ‘public toilets’.Paragraph 5.6.2 states that ‘Boroughs should define ‘largescale’ for their local circumstances’.

It is questionable whether the provision of public toilets is a sufficiently strategic matter to be addressed by the London Plan. In any case, our experience is that the current approach risks becoming the kind of seemingly trivial point that can delay the delivery of development through creating unnecessary ambiguity and debate amongst Officers and decision-makers. If the London Plan is to address this matter then it must provide clear guidance on what ‘large-scale’ means.

User:	London Borough of Newham

Policy S6 Public toilets

LBN are supportive of the policy as it will push the development industry to increase the levels of accessibility of developments. The policy is also complementary to Newham's Draft Revised Local Plan.

LBN would suggest that the policy should also refer to bus/train/tube stations as places where free toilets are expected (particularly where station upgrades are being undertaken) to promote the accessibility of the transport network. This is particularly relevant in the absence of toilets on new trains such as those on the Elizabeth Line.

User:	London Borough of Sutton

SUPPORT WITH CONDITIONS. The London Borough of Sutton is supportive of greater provision of publicly-accessible toilets in large scale development proposals. The council considers that Policy S6 Public toilets should make clear that boroughs determine where this would be sought, to ensure it is appropriate for local circumstances, and that ongoing maintenance costs are met by development.

User:	Elephant & Castle Properties Co Limited

Policy S6 – Public Toilets. Whilst the intention of this policy is supported, we consider it should be amended to provide greater flexibility based on local circumstances and the types of development being proposed. For example in the case of the proposed Elephant & Castle development, substantial toilet provision is expected to be publicly accessible via new shops, bars, restaurants and leisure uses, (together with UAL:LCC's own provision for their students), and therefore further standalone provision may not be appropriate and may add further viability pressure to marginal schemes, space for which may be better utilised for additional town centre uses to support regeneration and provision of services. The policy should be amended accordingly.

User:	Alzheimer's Society

1. Policy **S6** Public Toilets correctly identifies how important clearly signposted public toilets are for disabled people and older people. Last year the Lancet published short paper on the provision of dementia friendly toilets[1]. In it they explain that some older people fear leaving the house because of the lack of appropriate, well signposted public toilets. They also emphasise that the lack of signposting can negate the positives of a well-designed toilet facility.

[1] http://www.thelancet.com/journals/lancet/article/PIIS0140-6736(17)31813-5/fulltext

User:	Alzheimer's Society

1. We’re delighted to see the Changing Places toilets being advocated in paragraph **5.6.6**. One of the simple to solve issues that we have identified in the provision of dementia friendly toilet facilities is carers having to enter opposite-sex toilets to guide their partners out, or the person going through the wrong door and becoming lost[1]. This would avoid that problem.

[1] https://blog.alzheimers.org.uk/dementia-insight/dementia-friendly-toilet-facilities/

User:	London Borough of Ealing
The Council supports this new policy.	

User: Highgate Society

Support and comment

We have reviewed this policy in relation to public toilets and would strongly support all of the points. We would particularly support the importance of good public toilet provision to allow shops and local businesses to be as accessible as possible.

Over the last years the Highgate Society has worked closely with Camden Council to find a viable way for existing public toilet facilities in the Camden borough to be kept open. We would recommend that the aim of supporting London councils to retain existing public toilet facilities wherever possible is added to this policy

User:	Sustrans

We support the inclusion of a policy for public toilets for their role in enabling a diverse range of people to spend time outside, supporting longer periods of
time spent walking and cycling.

User: Redrow Homes London Division.

The London Plan seeks ‘large-scale commercial developments that are open to the public’ to accommodate ‘public toilets’.

Paragraph 5.6.2 states that ‘Boroughs should define ‘largescale’ for their local circumstances’.

It is questionable whether the provision of public toilets is a sufficiently strategic matter to be addressed by the London Plan.

In any case, our experience is that the current approach risks becoming the kind of seemingly trivial point that can delay the delivery of development through creating unnecessary ambiguity and debate amongst Officers and decision-makers. If the London Plan is to address this matter then it must provide clear guidance on what ‘large-scale’ means.

User:	Andrea Carey Fuller

In D5, GG1 F, SD6 H, H16 4.16.10 and S6, add ‘children and young people as follows: disabled people, older people, children and young people and families with young children.

User: Aviva Investors Pensions Limited and Galliard Homes Limited

Policy S6 requires large-scale commercial developments that are open to the public to provide and secure the future management of free publically accessible toilets.

The supporting text to Policy S6 states that Boroughs should define ‘large-scale’ for their local circumstances.

Aviva and Galliard note that the definition of large scale needs to relate to the individual centre in which a development is proposed to take place but that this must also be subjects to commercial realism in respect of management and viability considerations.

For example, the proposal by London Borough of Southwark to adopt a threshold of 1,000 sq. m for where large schemes are required to provide public toilets, public drinking fountains and public seating is far too low. This quantum of floorspace could effectively comprise a single, standalone retail unit. Large scale commercial development requiring public facilities should be, as a minimum, multi-unit schemes that have a wide catchment or draw.
A full and detailed assessment of existing public facilities and private facilities available to the public (e.g. cafes etc) should also form part of the consideration as to whether new facilities are required.

User: Unknown

Our client supports the policy proposal that large-scale commercial developments, such as shops and leisure facilities, should provide and secure the future management of free publicly-accessible toilets. Our client also agrees that facilities should be suitable to disabled people and families with young children. Ensuring that public places have such facilities will help maintain an area’s vibrancy, as it will give individuals the confidence to move around the area and spend longer in these large-scale commercial developments. The policy is unclear whether developers are required to fund the provision of these facilities in the public realm. This provision should typically be provided by the local authority through CIL as they are not specifically required to support the development but are a wider public facility.

User:	London Borough of Camden
This policy is welcomed.	

User: Age UK London - a charity working with older Londoners

POLICY S6: PUBLIC TOILETS

PROPOSED POLICY AMENDMENT:
Age UK London agrees strongly with the objectives of this policy but feel that smaller town centre type developments should make a contribution to toilet provision. This may be by way of an off-site contribution.

Policy S6:
A Development proposals that include MEDIUM TO large-scale commercial AND TOWN CENTRE developments that are open to the public, such as shops, leisure facilities and large areas of public realm, should provide and secure the future management of free ON SITE publicly-accessible toilets. These should be available during opening hours, or 24 hours a day in areas of public realm and should be suitable for a range of users including disabled people and families with young children. WHERE A NEW TOILET CANNOT BE PROVIDED ON-SITE IT SHALL BE APPROPRIATELY LOCATED IN THE VICINITY OF THE DEVELOPMENT PROPOSAL.

B Larger developments where users are expected to spend long periods of time or where there is no other local provision, should also provide ‘Changing Places’ toilets as identified in the British Standard BS8300.

C. WHERE, IN SMALLER COMMERCIAL AND TOWN CENTRE DEVELOPMENTS, A TOILET CANNOT VIABLY BE PROVIDED, THE SCHEME SHALL MAKE AN OFF-SITE FINANCIAL CONTRIBUTION TOWARDS SUCH PROVISION.

D. ALL PUBLIC TOILET PROPOSALS SHALL PROVIDE A PUBLICLY ACCESSIBLE MANAGEMENT PLAN, WHICH SHOULD BE KEPT UP TO DATE AND RELEVANT TO THE NEEDS OF THE LOCAL COMMUNITY.

START PARA 5.6.1. with the words ‘WELL MANAGED’...

NEW POLICY ON LIVE/WORK

PROPOSED POLICY AMENDMENT:
NEW POLICY on live/work accommodation, which should mention how this type of development can be disability and age friendly.

User:	Age UK London - a charity working with older Londoners

46. S6 LINK TO POLICY CHANGE Age UK London strongly welcomes this policy, which was carefully considered at a conference held to consult on aspects of the NLP. We welcome the Mayor’s recognition that lack of toilet provision prevents many older people from going out and the diminution of quality of life that ensues. What perhaps may not be as well understood, is the extent of the critical importance of public toilets to older people. In addition to the proposed amendments, people desired a grid map of public toilets, determining the walking distance between them and also to have them available at every underground station and at every bus terminus. Older people wanted reassurance that public W.C.s would be well maintained and be permanent. Concern was expressed that public W.C.s were closed down and not reopened in centres if they were found to be in need of repair.

User:	Federation of Enfield Residents & Allied Associations

The LP talks of the importance of public toilets – Enfield has in hand a plan to progressively remove all public park toilets, citing vandalism and cost as the cover story; FERAA totally rejects this further erosion of public assets – how can quality of life be retrained if toilets are removed? The LP needs to address this risk, and with sanctions.

User:	Women's Resource Centre

S6 – Public Toilets

5.6.3 Planners are welcome to provide gender-neutral toilets should they wish. However it is vitally important that women-only toilets are also provided; as they continue to face dangers where men are allowed to use the same facilities.

Attention also needs to be paid to understanding the difference between sex and gender. Gender as a social construct makes women vulnerable to those who may or may not self-identify as another gender and who may also present a threat and/or danger to women

Policy S7 Burial space

User:	Mr Peter Eversden MBE
Policy S7 for burial space is supported.	

User:	Mrs Lynne Bailey

This feels like taking away green spaces 'by the back door'. Parkland used as a burial ground will not be the same.

User:	National Resource Centre for Supplementary Education

Where burial grounds are owned privately, boroughs must ensure that these places properly serve the needs of communities that use them.

I am a member of the Turkish Cypriot community that uses Tottenham Park Cemetary. We have had long running concerns about the state of this cemetary. Only due to concerted efforts of the community has started to act.

User: Council of British Archaeology

CBA (L) welcomes and supports the historic environment policies in principle , which seem to us to cover most of the issues in planning and archaeology in general terms. we have some specific points to raise which we believe would improve the London Plan. The plan is predicated on substantial growth. The implication of this rate of growth for archaeology is that mere reliance on NPPF guidance and developer led funding is not going to be enough. There will be a need for more archaeologists/resources to:

- review sites;
- Carry out excavations where necessary;
- Undertake post excavation assessments and reports;
- Publish reports;
- Archival storage of material excavated;
- up date identification of Archaeological Priority Areas to make sure these are accurate (as far as they can be) and based on best evidence of likely finds.

Although the historical and archaeological environment may sit primarily in the chapter dealing with culture, these issues potentially run through all developments and concerns dealt with in other chapters. Ideally, we would like to see a Heritage Strategy for London as a free standing mayoral strategy document.

There is virtually no mention of places of worship as heritage – especially churches – which given the number of historically, architecturally and archeologically significant churches is an unwelcome omission. A separate Heritage Strategy would be unlikely to leave such a gap. Historical and archaeological matters should be read through to both natural environment policies and to polices covering other features such as canals, whose historic component is an essential part of their character and importance.

This is because historic and archaeological environment is potentially very broad , including such places as ancient woodland, canals, rivers and their riparian areas, commons and parklands, and previously industrial and military sites including for example rapidly disappearing but important first and second world war sites. These areas can easily be ignored or overlooked. This also needs to be reflected in the Green Infrastructure Policy and Environment Strategy (G3and G7) and in mineral extraction and burial grounds **(S110 and S7)**

We have concerns about the archaeology that is not yet known about, the “Tier 4” areas. Tiers 1-3 are defined based on current knowledge, but at what scale of development does a project have to be before the planning authority requires some sort of assessment or evaluation to see if there are previously unknown assets? Policy H2, covering the granting of planning permission in principle for small housing sites could put such archaeology at risk without an appropriate assessment.

In relation to the larger developments represented by Opportunity Areas these should be underpinned with broad archaeological strategies covering such areas (Policy SD1).

Andrew Dismore AM

Chair of Trustees

CBA London

User:	London Forum of Amenity and Civic Societies

London Forum supports this policy.

User:	Diocese of Southwark
The protection of cemetries is fully supported by the Diocese of Southwark.	

User: Mrs Tunay Hussein

The law in England needs to be changed as there is little Councils can do to oversee the management of privately owned cemeteries. Hundreds from our Turkish Cypriot community are outraged by the way Tottenham Park Cemetery in Montague Road in Edmonton has been so badly managed over at least two decades. Enfield Council have recently issued enforcement orders following complaints. Health and Safety issues are a real concern as well as suspicions of poor practice in re using graves without licence are just two major problems. There are many more. Tighter monitoring is needed and more respect for the needs of community groups in relation to providing suitable cemetery sites.

User:	Trust for London

We welcome the acknowledgement of the particular challenges of travel to burial spaces for low-income Londoners. In addition, the lack of burial space in some areas contributes to high funeral costs which has a major impact on low-income Londoners (More information from our grantee Quaker Social Action at www.fairfuneralscampaign.org.uk)

User: Gardens of Peace Muslim Cemetery

The Gardens of Peace welcome the Mayor of London's new draft London Plan, published in December 2017 and the opportunity to offer comments upon it.

We are pleased to see the importance given to the protection of cemeteries.

We understand the challenges surrounding the provision of new burial space within London. We also understand the opportunities that the re-use of burial space can offer to enable the continued provision of local burial space and the sustainability of cemeteries.

The re-use of graves requires sensitivity to the feelings of living relatives and we are aware that this is recognised to an extent within current legislation, which requires public notice of intentions to extinguish exclusive rights of burial and to re-use graves and provides rights of objection.

Re-use also requires sensitivity to religious beliefs and we note the undertaking to consult faith groups that Parliament required in approving the New Southgate Cemetery Act 2017. Objections based upon religious belief to the re-use of graves are likely to be held by people of various faith groups into the long term. Whilst he supports the re-use of graves, we encourage the Mayor to recognise the need for greater sensitivity to the religious beliefs held by Londoners and to support greater clarity in the legislation applicable to optimising burial space, particularly through the re-use of graves.

We are very pleased to note the Mayor's view that burial provision in London requires a strategic approach and that Development Plans should recognise the need to plan for the different requirements of different communities.

We are also pleased to note the Mayor's encouragement to boroughs to support development proposals for new cemeteries. It is our experience that boroughs place little importance upon the need for new burial provision, particularly if they perceive that is likely to meet the needs of communities outside of their own borough boundaries.

The shortage of burial space is a national issue, with planning legislation and its interpretation hindering the development of new cemeteries. We urge the Mayor to support a review of existing planning restrictions on cemetery development.

We are especially pleased to note that the Mayor recognises that the proximity principle, whilst very important, cannot always apply to the provision of burial space that meets the needs of different communities.

Previously, we were somewhat dismayed to note that the proximity principle, referred to in Policy 7.23 of the previous London Plan, was reinterpreted by the subsequent Social Infrastructure Supplementary Planning Guidance published in May 2015. In section 8 ‘Burial Needs’, the SPG states:

“London Plan Policy 7.23 encourages local authorities to provide burial space in close proximity to their residents …”.

In introducing the word ‘close’ in reference to proximity, the Supplementary Planning Guidance seems to suggest degrees of proximity and a requirement for burial space provision to be restricted to ‘close proximity’, which was not explicit in Policy 7.23.

Paragraph 5.7.1 in the new London Plan recognises that

“… there may be cases where meeting the needs of residents in one borough may require burial provision to be located in another borough. This may require a sub-regional approach to the provision of burial space”.

We would therefore request that the more realistic meaning of proximity as stated in paragraph 5.7.1 of the new Draft London Plan is not restricted by any subsequent Supplementary Planning Guidance.

Cross-borough and sub-regional working is notable by its absence with regard to burial space provision. Some boroughs are content to provide burial space, regardless of whether it meets the needs of different communities. The Mayor makes it clear that boroughs need to take a more strategic approach to burial provision than they have to date.

We are pleased to note that the Mayor recognises that overcoming the challenges of identifying suitable sites for new cemeteries may require their development in Green Belt or Metropolitan Open Land. We appreciate the importance of such designations and the need to preserve the openness and the purposes of the designations. We believe that the way we design and manage our cemeteries, including the simplicity of small tablet memorials, fits in with land under these designations.

We seek to create cemeteries that have a minimum negative impact upon the environment. Whilst we appreciate the potential benefits they offer to people and the environment, we do not regard woodland or parkland burial as being compatible with Islamic requirements. Our cemeteries enhance the environment through planting schemes including many trees. Our cemeteries are a distinct form of Natural Burial. We do not embalm our dead or bury them in polythene-lined coffins that have caused pollution during their manufacture and transport and will pollute the earth. We bury our dead simply wrapped in cotton sheets, without other materials or grave goods and our memorials are uniformly small scale and modest. In these ways, our cemetery and burial practices embody our religious beliefs.

Islam requires us to bury our dead. Whilst we appreciate the potential benefits of innovative approaches to providing places for ashes following cremation, these would not be relevant to us.

User:	Putney Society

Para 5.7.1 We support the statement that in assessing the requirements for burial space, account should be taken of the fact that different faith groups have different needs for burial provision.
The pressure on available land for burial must encourage sub-regional and cross borough planning, as well as innovative approaches to the provision of space for burial of ashes.

User:	Trees and Design Action Group

Burial spaces are significant elements of open space and green infrastructure within the urban environment and reference is made to this in the supporting text. We would like to see explicit reference made in the Policy to the importance of good landscape design and management for new and existing burial spaces and for opportunities to be taken where possible to plant large-growing, long-lived trees in such spaces. Suggested policy addition:

D. New burial spaces should be designed, laid out and managed to make a positive contribution to green infrastructure including the planting of large-growing and long-lived trees where possible.

User: London Borough of Islington

Draft London Plan Policy

Policy S7 Burial space

Islington Response

While the policy is not something we have particular disagreement with, it needs to be recognised in the policy itself (particularly with regard to the principle of proximity) that this policy would cause considerable conflict with other plan objectives, particularly in a borough such as Islington with severe constraints on available land.

Provision of burial space is an area where the Mayor should take a lead role, perhaps even identifying appropriate broad locations, given that it needs to be looked at on a multiple-borough, if not London-wide, level.

User:	City of London Corporation

The policy or supporting text should recognise the significance of historic burial grounds and churchyards, their cultural interest and biodiversity role and potential.

User: London Tree Officers Association

5.7.4 When making new provision, boroughs are encouraged to take into account the Mayor's broader aims for **green infrastructure and the natural environment,** including, but not limited to, the creation of new parks and open spaces, the enhancement of existing open spaces and natural environments, and the provision of enhanced links to London's green infrastructure. Woodland or parkland burial grounds can offer broad burial provision as well as wider public access. Amenity provision and environmental enhancements should be encouraged.

The LTOA considers that a specific reference to trees should be included in this paragraph. In this paragraph there is a sole reference in the draft plan to 'amenity' but the reference to the amenity that trees provide is lacking in other policies and supporting text is

User:	London Borough of Haringey
The Policy is supported	

User:	Environment Agency

We welcome reference to the Mayor’s encouragement to boroughs to take into account his aims for green infrastructure and the natural environment.

Recommendation:

Para. 5.7.4. It may be useful in support of social inclusivity and reduction in health inequalities, to reinforce the need for borough cross-boundary collaboration on green space provision, access to it, and connectivity. We also, suggest referencing the role of the proposed Green Space Commission outlined in the Mayor’s draft Environment Strategy.

User:	London Borough of Brent

The policy is supported, although given existed capacity issues and pressure to accommodate additional growth, new significant areas for additional capacity are unlikely to be available in Brent. This is perhaps something that the London Plan needs to address at a strategic level, taking account of the potential offered by the Green Belt for traditional (for different faith/ethnic groups) and green burials.

User:	London Borough of Bromley

The Council supports the protection of cemeteries and the reuse of burial space but has concerns regarding the implications of a sub-regional approach and the pressure that might place on Bromley's open spaces, particularly with regard to built development (chapels and crematoria)

User:	London Borough of Tower Hamlets
This policy is supported.	

User:	Royal Borough of Kingston

RBK is disappointed that the need for boroughs to work together has not been addressed directly by the Mayor through the London Plan as a strategic matter. The GLA could have undertaken some work to set out current and future requirements for provision. Whilst the difficulties of meeting this land use in inner and central London are acknowledged, it is also noted that Outer London is equally constrained by MOL or Green Belt designations. The policy should make it clear whether such locations are appropriate for this type of development.

User:	London Borough of Waltham Forest

We agree with the protection of, and support for new cemeteries. However, as a borough we have limited burial capacity remaining. The Mayor should be taking a more prominent role, working with boroughs to identify capacity across London for all faith groups.

User:	London Borough of Hounslow
LB Hounslow supports this policy	

User:	London Borough of Hackney
Hackney supports this policy.	

User:	London Borough of Richmond Upon Thames

The proposed draft London Plan policies align with the protection afforded to cemeteries allocated as Green Belt, MOL, or OOLTI within LB Richmond.The policy’s additional requirement that new provision of cemeteries should account for broader green infrastructure and natural environment goals and/or requirements is welcomed.

User:	London Borough of Harrow
The Policy is supported.	

User: London Borough of Havering

Paragraph 5.7.1

The draft London Plan is correct to recognise that inner/central London Boroughs seeking burial space within outer London Boroughs may cause social friction and risk undermining social integration and community cohesion. The draft London Plan could help signpost faith groups who may have specific burial needs towards existing provision that would better meet their requirements.

Paragraph 5.7.2

The re-use of graves has not so far been considered in Havering. The draft London Plan should acknowledge that this approach is likely to be very controversial across London.

Paragraph 5.7.4

Havering recognises that parkland burial grounds offer opportunities for burials. The London Plan should recognise that there are constraints to such provision including funding and securing the provision of supporting infrastructure and on-going monitoring regimes such as water table monitoring. would take considerable investment and not necessarily be cost effective. There are also lots of practical issues in managing burials in parkland such as the clash of expectations between park users and bereaved families.

User:	Pilbrow & Partners
Proposals for reuse of burial space should take account of religious and cultural beliefs and heritage assets.	

User:	Association of Local Government Archaeological Officers (ALGAO)

Request a statement that historic burial grounds are heritage assets, often undesignated. It is unclear if the policy applies only to cemeteries still in use. National guidance published by Historic England and the Church of England establishes that burials over 100 years old are likely to be of archaeological interest which should be considered in relation to proposed clearance or re-use with preference for protection.

User:	London Wildlife Trust

We support Policy S7, and welcome the reference to burial spaces and the broader aims for green infrastructure and the natural environment in the London Plan (para 5.7.4). Many existing cemeteries and graveyards are also designated Sites of Importance for Nature Conservation, and so the encouragement of the re-use of burial space needs to be qualified so that no net loss or damage to SINCs occur through this policy.

User:	The Forestry Commission

We welcome:

Links to GI and natural environment in Chapter 5 social infrastructure

User: London Borough of Newham

Policy S7 Burial space

LBN are broadly supportive of the over-arching aim of this policy. However, there are some issues that should be addressed to ensure the policy deals effectively with the provision of burial space.

This policy creates a resource burden for Local Authorities due to the addition of further local evidence base requirements. This initiative, due to the scale and limited locational possibilities for new burial spaces, along with the need for sub-regional co-ordination, should be GLA led.

Policy point C needs to be caveated to include a reference to the requirement to demonstrate an identified need in the area and accounting for the amount of strategic provision in place in an area.

User:	London Borough of Sutton

OBSERVATION. The London Borough of Sutton considers that Policy S7 Burial space should include the proximity principle to ensure boroughs consider all available options to address local demand for burial space and that this is a prerequisite to wider sub-regional working.

User: Ms Ayshe Ecvet

I and many members of our community in North London with a high proportion of Turkish Cypriots who bury their loved ones in the privately owned Tottenham Park Cemetery, Montagu Road, Edmonton N9 have been experiencing many difficulties and problems for several decades. The unresolved issues at Tottenham Park are getting worse with not enough legislation and clarity in the law for privately owned cemeteries to follow. I would like to see the outdated cemetery laws to be updated and for both council and privately owned cemeteries to be governed by the same laws.

New cemetery space is also required and should be made available to the community as soon as possible.

User:	London Borough of Ealing

The advice that the provision of facilities for cemeteries may not be inappropriate development in the Green Belt or on Metropolitan Open Land may be misleading. Whilst this may be the case if no change of use has occurred (i.e. the site were previously occupied as a cemetery), where the cemetery use represents a new use (i.e. a material change of use has occurred), it would represent ‘inappropriate development’, even if it does not obviously conflict with the purposes of the Green Belt.

It should be noted that the exceptions outlined in the NPPF relate only to buildings and not to use. Thus the second bullet point under Paragraph 89 covers the construction of a building (for example a café) as an appropriate facility for an existing cemetery, but it does not cover a material change in the use of land so as to create a new cemetery. See Timmins v Gedling BC.

User:	Natural England
5.7.4 and 5.7.5 - We support the integration of woodland or parkland burial grounds into the wider accessible green infrastructure.	

User:	Natural England
5.7.4 and 5.7.5 - We support the integration of woodland or parkland burial grounds into the wider accessible green infrastructure.	

User: Historic England

It is unclear whether the policy applies only to cemeteries still in use. The need to consider any historic and archaeological interest in relation to proposed clearance or re-use should be highlighted, including the need to accord with national guidance on best practice.

This policy is designed to address burial space. However, we note that historic burial grounds are heritage assets. In our view, their protection and management should be promoted through the Plan. The Plan should recognise the rich heritage that London's burial grounds represent and refer to the Magnificent Seven cemeteries specifically. These are the Victorian cemeteries of Kensal Green, West Norwood, Highgate, Abney Park, Nunhead, Brompton and Tower Hamlets. More could be made of the value of protecting and enhancing these for educational, leisure and tourism.

Recommendations for change

In policy S7, amend part A to read:

'Cemeteries should be protected and re-use of burial space supported **where appropriate, taking account of any historic or archaeological interest, and national best practice'**

We recommend an additional paragraph after para 5.7.5:

'London's historic burial grounds, either associated with places of worship or as cemeteries, contain many heritage assets and these should be positively protected and managed. The 'Magnificent Seven' Victorian cemeteries are part of London's strategic social infrastructure, and are increasingly recognised for their educational, leisure, landscape and historic value.'

User: London Parks and Gardens Trust

There is no specific mention of the social and cultural heritage evident in London's cemeteries, yet Comment 5.2.8 earlier on discusses co-location of facilities. In particular theTrust believes several major historic cemeteries' deserve special protection including the 'Magnificent Seven' (Brompton, Highgate, West Norwood, Tower Hamlets, Abney Park Cemetery, Kensal Green and Nunhead) amongst other historic cemetery landscapes.

The Trust believes that in general when considering the re-use of burial space thought should be given to the significance of the existing memorial. In seeking to increase burial space, boroughs should consider the landscape design intentions of the cemetery as a whole. The pressure for more space should not lead to the erosion of historic landscape design by the infilling of paths or other specifically designed open features. Guidance is provided, in particular in Chapter 8, by *Technical Guidance on the Re-Use and Reclamation of Graves in London Local Authority Areas* (October 2013) by London Environment Directors Network.

User:	Chartered Institute for Archaeologists

The natural environment, landscape and parks are all created from land management and incorporate human activities over many centuries and are an archaeological as well as natural resource. The Green Infrastructure Plan G3 should demonstrate the wealth of historic environment incorporated in our green spaces and woodlands. A similar consideration should extend to policies for mineral extraction (SI10) and burial grounds (S7).

Policy SD1 Opportunity Areas

User:	Mrs Alona Sheridan

Policy SD1 on Opportunity Areas should require sufficient space for the amenities usually provided by parks, in particular playing fields and courts for open air sport. **Proposed change:** Policy SD1 B(3) should be amended to read ‘plan for and provide the necessary social and other infrastructure to sustain growth, working with infrastructure providers where necessary, **and ensuring open and green space is planned to accommodate informal and formal outdoor sports.**

User:	Blanche Cameron

Policy SD1 on Opportunity Areas should require sufficient space for the amenities usually provided by parks, in particular playing fields and courts for open air sport. **Proposed change:** Policy SD1 B(3) should be amended to read ‘plan for and provide the necessary social and other infrastructure to sustain growth, working with infrastructure providers where necessary, **and ensuring open and green space is planned to accommodate informal and formal outdoor sports.**

User: Regeneration X

Policy SD1 Opportunity Areas

The Mayor will provide support and leadership for collaborative preparation and implementation of planning frameworks. The Mayor must ensure that the Planning Departments of Borough Councils are fully and adequately resourced so that they can truly work in partnership with The Mayor's Planners, otherwise it will be clear that these frameworks are being pushed from the centre and have no local support or legitimacy.

SD1 Regeneration is mentioned. This requires a definition of regeneration that is not synonymous with Property Development. Property Development and Regeneration are two very different things.

SD1 mentions affordable housing. Affordable Housing has become a devalued term because of its misleading nature in usage. The public do not understand what is meant by affordable housing and such 'code words', with meanings other than a common or garden dictionary definition, should not be used.

SD1 also says that Boroughs should support and sustain Strategic Industrial Locations (SILs). It must be ensured that it is not possible for only a few land owners of SILs (and other employment land) can dictate rents. Employers and businesses require cheap premises and this must be the focus, not the opportunity for value extraction by a few land owners. A successful UK industrial strategy requires the focus to be on those who create value by running productive businesses not on extractive business who takes rents from those that create value. It must also be recognised that many jobs are not in SILs but tucked away in, around, behind and on the edge of town centres and these are important suppliers of cheap work space.

User:	Regeneration X
2.1.2 *'Many Opportunity Areas overlap with Strategic Areas for Regeneration*'. This seems to be an admission that Opportunity Areas are about property development and not regeneration. This is unacceptable; all sites in London must be about regeneration and not be only seen as opportunities for property development.	

User:	Regeneration X
2.1.9 Talks about the 4 Principal Approaches from the Housing Strategy. The London Plan needs to explain how the Mayor's actions and funding will not be used to just, or mainly, subsidise the profit of the private sector developers and landlords and how his policies and funding will lead to additional delivery above and beyond what would happen anyway.	

User:	Regeneration X

2.1.11 says that the development value in Opportunity Areas could contribute to the funding of the schemes. But this will only be the case if policy requirements are incorporated into the developers' proposals and priced accordingly in their development appraisals and thus the price paid for the sites. Developers must not be allowed to use 'viability' arguments to get out of meeting policy requirements.

User:	Regeneration X

Old Kent Road Opportunity Area
2.1.14 Says that the Area Action Plan for Old Kent Road should plan for no net loss of industrial floorspace', and 'Areas that are released from SIL should seek to co-locate'. These statements are far too weak. The policy must be changed to say 'must' and say that sites will not be released for housing until done so. Already existing and viable businesses are being forced out of the Old Kent Road Opportunity Area, and it is vital that new sites accommodate the needs of existing businesses so that these businesses can continue and grow and are not forced out by new developments.

User:	Regeneration X

2.1.18 Phrases such as 'large-scale redevelopment of 5 key sites including Catford Shopping Centre', are banded about seemingly without regard to the fact that people actually live here. However, it is good that the term Redevelopment is used rather than the false use of the word Regeneration. Nevertheless, there seems to be no assessment of whether Milford Tower needs re-development or does it really need renovating. There is no mention of how much social housing there is now and how much there will be once re-developed.

User:	Regeneration X

Cross Rail 2
2.1.19 CR2 appears to be a Ponzi Scheme. It is 'required' for London to grow and the business plan for it requires London to grow even more to fund CR2. To deliver the increased density development along the CR2 corridor, and at its transport hubs, requires such a high standard and sensitivity of design that is unbelievable that this will be achieved. Some of the development unlocked by CR2 can only be delivered once CR2 is operational but it is very unclear how and if CR2 will be financed in order to do this. Too much of CR2 is predicated on shipping more and more people into Central London for work. The ambition to have some outer London Hubs as sites for major office speculation and jobs is fanciful – too many people prefer to take inner London's higher salaries, and these areas are too secondary for speculative developers. Likewise the proposals to relieve congestion at Clapham Junction by increasing development around and above the station is fanciful thinking. This is likely, over the long term, to lead to more congestion.

User: Regeneration X

2.1.31 Talks about Lee Valley and that there should be no net loss of industrial floorspace capacity
and intensification of industrial land and co-location, but is totally silent on the type of provision which is required, nor the cost of rents which are required (that is, which are affordable) to the type of business and firms which the area requires. Too much of the draft London Plan seems designed for the benefit of rent takers, rentiers, and international investment, rather than productive, value-creating enterprises.

A strong presumption in favour of 1 to 25 homes. This is the danger in the suburbs. Will we have developers slowly buying up semis, leaving them empty or let as HMOs until they own enough to start developing? This, and other policies to intensify the suburbs is a formula for blight.

User:	Regeneration X

2.1.37 Thames Estuary North and South
Talks about 250,000 new jobs. Where do these numbers (and other job figures) come from? Are they based on estimated demand for workers; the number of people who will need jobs, or they based on the area available for development multiplied by employment density figures?

User:	Regeneration X

2.1.39 *The Mayor has set out a vision to transform the Thames Estuary into a hub for large-scale state of the art production facilities with an initial focus on creative and cultural industries*. This focus on production facilities is only looking at one side of the equation. There needs to be, and must be, places in London for major users of these facilities. The production facilities are the supply, but we must also plan for and provide the demand. High quality users of the supply are required to provide the 'domestic' base for the supply and for the producers to show credibility when trying to 'export' the supply. For example, *The Garden of Ideas* (http://www.gardenofideas.org/) or a project of similar sale and impact, should be specifically mentioned in The London Plan for the Thames Estuary North and South (and indeed for the London Stansted Cambridge Corridor) . Just looking at supply without planning for domestic demand, and specifically a (or a number) of anchor institutions to act as an outlet for the supply is only looking at one side of the coin, and puts too much dependence on producers winning contracts from footloose overseas sales which can be very variable.

User:	Regeneration X
2.1.40 What is the Thames Gateway Strategic Group and why is there also a Thames Estuary 2050 Growth Commission? Why is there this duplication of effort?	

User:	Regeneration X
2.1.41 Proposed Thames Crossings do not seem to look beyond the mile or so either side of the Thames. Planning for these crossings must extend to the wider East Thames Gateway hinterland and be totally integrated into plans for housing and employment growth.	

User:	Regeneration X

2.1.42 Says that The Mayor (and the London Plan) will support the extension of The Elizabeth Line (Cross Rail 1) to North Kent. This is a very vague statement and we wish to see which parts of North Kent the Mayor is talking about (i.e which towns). We are also very concerned by many of the Transport Plans which are and have been brought forward: it must not be the case that longer distance commuting (eg from Kent) is provided to the detriment of shorter distance commuters (eg from outer London). It appears that the proposed new South East Train Franchise is making life worse for those in outer London Boroughs in order to make it easier to commute from longer distances: this is unacceptable and embeds inequality.

User: Regeneration X

2.1.48 We cannot understand why major sites in inner London (for example the Royal Docks) need the incentive of being made into Enterprise Zones. London is a world city, and sites in inner London do not need the tax incentives of an EZ to attract investment that would be coming anyway. We do not support the creation of Enterprise Zones anywhere in London.

We are also concerned that the plan talks about ensuring that industrial capacity is managed in ways that reduce overall vacancy rates; unless this means that the Mayor will insist on rents and prices of vacant industrial land falling until there is demand for its use for employment. In a plan over a long period such as the London Plan we do not know what will happen and what sort and type of work there will be, so we must not be afraid of industrial land being vacant as long as it is not left abandoned or derelict. A certain level of vacancy is required to enable new business creation, business growth (or new and existing firms), and movement of firms. There must also be a temporary use strategy for each major industrial area.

User: Regeneration X

Thamesmead and Abbeywood Opportunity Area
2.1.51 Talks about 'no net loss of industrial floorspace capacity', but the plan is silent on the types of floorspace and its costs (rental levels). We must avoid this theoretical 'rationalisation' leading to empty sites which can't be taken up by real businesses because the rents demanded are too high for the work available. There must be a temporary use strategy and a strategy for the retention of existing jobs and firms and for the transformation to Industry 4.0.

The Plan talks about the need for new infrastructure to support the intensification of these (and other) areas. But we must avoid what originally happened with Thamesmead – it was built in anticipation of transport and other infrastructure which didn't actually materialise. We are very concerned that the infrastructure which is required for London to grow will not be provided but the growth will happen anyway – therefore we will get poor growth. The lessons of the past are there and must be learnt.

The Plan talks about the need for new utility infrastructure (water, electrical, broadband, and flood management) without saying how this will be delivered, funded and financed. It strikes us that The London Plan has just said that people want to come to London so let's let it happen without thinking whether it is good for London, or good for the rest of the UK.

User:	Regeneration X

Bexley Riverside Opportunity Area
2.1.53 The London Plan talks about the extension of The Elizabeth Line (Cross Rail 1) to Slade Green and beyond. This is a very brave assumption and it gives a false impression of how much growth can be delivered in the area. It is better to be upfront and only plan for what can be supported by what infrastructure will actually be delivered. The need for improved bus services to support the growth of this area is mentioned: this is welcomed but it must be remembered that this is outer London and buses can only help with some journeys – many people in outer London travel away from London for work and will continue to be car dependent; many people from the surrounding counties travel into the outer London Boroughs for work but not by using public transport so they are, and will remain, car dependent. This car dependence in outer London must be accepted and addressed but as currently proposed The London Plan seems to have been written by those who only know central London.

User: Regeneration X

Euston
2.1.66 Talks about the comprehensive transformation of the area, but does so as if no-one already lives there, making a life and a living. There is no debate about who the 'transformation' of Euston is supposed to benefit: the existing community or international and institutional finance and developers for who this could be anywhere. Why was the term 'transformation' used as what appears to be a euphemism? The Plan should be upfront and call it demolition and redevelopment

In addition why is a development partner being sought? The benefits should be accrued to the public and driven by the public. Will the benefits be privatised but the risks and losses socialised?

We note that the London Plan says nothing about the intensification of Mayfair.

User:	Network Rail
2.1, pages 28-56 – Growth Corridors and Opportunity Areas – The opportunities for new homes and jobs in each of these areas should also give recognition to the need for capacity enhancement of existing rail services in addition to the new schemes being highlighted. For example on page 55, the development opportunity in the Croydon/Suttons areas resulting from extensions to Tram services would also be enhanced by the Brighton Main Line programme and redevelopment of East Croydon Station.	

User:	Network Rail
2.1.17, pages 35-36 – Network Rail supports the Opportunity Area at New Cross/Lewisham/Catford. However, this paragraph should acknowledge the constraints and issues faced at Lewisham Railway Station and the interchange. Significant pressure is being placed on the station from surrounding development, making it one of the most congested stations in the country. This paragraph needs to both acknowledge the needs of the station, but also promote both mitigation and enhancement directly from nearby developments and users of the station.	

User: Network Rail

2.1.26, page 39 - Clapham Junction OA - there a significant opportunity at Clapham Junction for oversite development. Crossrail 2 will, of course, improve the interchange opportunities but is not a prerequisite for the development to happen. TfL and Network Rail (along with our development partner Innova) are working together to provide technical assurance of any oversite development and Crossrail 2.

The wording of the Clapham Junction OA should be amended to the following:

Clapham Junction OA [paragraph 2.1.26]
Clapham Junction is Europe's busiest rail interchange station, and a designated Major town centre serving key commuter routes from West London and Southern England, and is identified as one of London's four strategic interchanges expected to accommodate rising levels of demand. However, the station is already operating at capacity in terms of rail services and passenger numbers and suffers from over-crowding at peak times. Reconfiguration of the existing rail infrastructure and the station is needed to increase capacity and substantially improve passengers public transport experience.

A comprehensive approach to the rail network station improvements along with Tthe proposal for a Crossrail 2 station this represents presents a unique opportunity to make more efficient use of land above and surrounding the station for residential and commercial development, including new retail and offices as part of the designated Major town centre. The station suffers from overcrowding at peak times, and requires significant investment to allow it to accommodate future growth in passenger numbers. The Planning Framework will need to fully explore and evaluate options to comprehensively deliver a reconfigured station alongside over-station development that reflects the role of Clapham Junction as a strategic transport interchange and growth corridor. for comprehensive over-station development, which would be reliant on a reconfiguration of the station layout. This will include the consideration of complex technical issues related to the operation of the railway and the integration with other transport infrastructure and services, including Crossrail 2. Careful consideration will need to be given to the urban design and place-making of the development and its integration into the existing streets and functions surrounding the station. It will be important to consider integration of any development with surrounding residential areas, and the Housing Zone.

User:	Karl Brown

2.1.32 As with the informing Transport Strategy, and whilst not being specific, the implication in the plan is that the Wood Green (rather than the via Alexandra Palace option) has the Mayors support as the choice for the New Southgate Crossrail 2 extension. As a transport driven solution (AP), rather than one focused on maximising development opportunity / income (WG), this increasingly looking fait accompli warrants close scrutiny.

User:	Karl Brown

2.1.36 Decking over and / or tunnelling under the section of the A406 referenced in this New Southgate section are two different approaches, but addressing two very different issues. The former is a development opportunity, the latter is an option to address an acknowledged dreadfully congested section of this busy road. This would appear to be expensive as well as disruptive to large areas of land nearby to allow access / exit from the tunnel(s). An alternate approach, linked to the air quality problem, of moving relevant volumes of east / west traffic to the M25 by a full extension of the ULEZ would appear to be substantially cheaper and far more environmentally favourable.

User: Pat Turnbull

Opportunity Areas

A clear map of the current 38 plus 9 Opportunity Areas should be included in the London Plan.

All references to Opportunity Areas currently scattered throughout the London Plan, usually allowing leeway for more intense development in these areas, should be removed from the text. Instead a new sentence should appear in the introduction: 'The GLA undertakes to make an urgent, detailed and public assessment of the effect of Opportunity Areas on the homes, jobs and facilities of those currently living in London. It will put on hold as of now the nine new Opportunity Areas and will not add to the 38 already existing until this exhaustive investigation has been completed and its findings published. The investigation will be undertaken with the full participation of all sections of the London community whose lives have already been affected by Opportunity Areas.'

User: Mr Daniel Willis

The Mayor’s recognition that the growth of London’s population and economy has had positive and negative impacts on London’s communities, and has the potential to further exacerbate existing inequalities across the capital, is welcome. In the London Borough of Newham, where Community Links is based, we have seen a range of impacts (investment in our local area, regeneration of derelict buildings) and challenges (increased housing pressures, displaced families, isolated communities) as a result of growth in the past decade. We are particularly concerned about the impact on Black, Asian and Minority Ethnic (BAME) communities in one of the UK’s most diverse local authorities and fear that this is not fully understood or addressed in the new draft London Plan.

We are dismayed to see that the proposed Plan would continue to treat large parts of Newham as an “Arc of Opportunity" from the Royal Docks to the Olympic Park. Whilst rhetorically this suggests that some of London’s most deprived communities will see much-needed investment, in practice regeneration has ignored the voice of the local community, displaced low-income families and forced them out of the Borough. Moreover, housing developments built for more affluent, incoming residents have been built to enable connection with Canary Wharf and the City, with their backs to the communities closest to them. Not only does this kind of growth threaten low-income families, but it has the potential to divide our community and make BAME communities feel increasingly like second class citizens. The local residents we speak to every day are asking: who are these Opportunity Areas an opportunity for?

We therefore call upon the Mayor to immediately conduct an assessment of the impact of Opportunity Areas on BAME communities across London, including an analysis of the impact of loss of social housing, community assets and cultural spaces. We support the call by Just Space for: a full review and assessment of Opportunity Areas and other delivery models; the promotion of “lifetime neighbourhoods” which “promote rather than eradicate, the existing qualities and diversity of London’s neighbourhoods”; and a shift away from growth-based models of development to a place-based, community-led London Plan. Furthermore, we call on the Mayor to amend “Policy GG1: Building strong and inclusive communities” to ensure that important community resources are not sacrificed on the altar of “Opportunity”, and that community assets of social and cultural importance to BAME communities, and others, are registered and protected during processes of regeneration.

User: Mr Daniel Willis

c) Place-based approach to community

At its core, the proposed Plan articulates how spatial strategy can produce a different kind of society, envisioning a London of the future which is (among other things) inclusive, diverse, digitally connected, economically empowered, greener and healthier. Community Links admires this vision and we believe there are significant parallels between the Mayor's view of London and our own place-based work at our community hubs in Canning Town, Silvertown and Stratford. In recent months, we have facilitated community consultations at each hub to co-curate, with local residents and organisations, a programme of activities designed to provide crucial advice, employability and digital skills training and health-based activities. With a particular focus on empowering young people and BAME communities in the local area, this place-based work is the starting point in enabling each area to become a "Ready for Everything Community". We encourage the Mayor to visit our community hubs to see the impact of our holistic approach to community services.

However, we are concerned that elements of the proposed London Plan may eventually undermine, rather than support, our work. Each of our hubs falls within Newham's "Arc of Opportunity" which has, in recent years, seen closed public services, rising house prices and the displacement of BAME and low-income families. Rather than supporting a local, place-based mechanism for delivering the principles of Good Growth and social cohesion, the design and architecture of recent development projects has divided and isolated communities. Opportunity Areas therefore appear to accelerate the unequal distribution of housing densification across the capital and subvert the guiding principles of the draft Plan.

Greater measures should be taken to ensure that a fair, inclusive, community-led Plan delivers on the Mayor's vision and protects the existing ecology of community services. In addition to the policy proposals set out above, we propose that the Plan: requires Boroughs to create community asset registers; ensures the protection of community spaces and services which are of social and cultural importance to BAME communities; and outlines more specific guidance for the "meanwhile use" of public land by community groups and the voluntary sector.

User: Atkins

Policy SD1 – Opportunity Areas are those parts of London that will see significant change. The policy identifies clusters of opportunity areas within key growth corridors. Some of the opportunity areas are in outer London, and the plan makes it clear that growth within growth corridors will require major investment in transport and other infrastructure. The Plan has a clear focus on radial corridors that will link outer London opportunity areas with the CAZ, this is without doubt important: to help reinforce agglomeration benefits the CAZ offers; to improve connectivity (access to jobs) and improving capacity on transport networks. However, there is no consideration of the importance of investing in orbital connections (public transport of all types, as well as improved walking and cycling infrastructure) and how local transport improvements connecting suburban areas to outer London's opportunity areas and town centres will be key to helping all Londoner's access opportunities. We believe the London Plan needs to clearly support orbital connectivity in Policy SD1 and other parts of the Plan.

The plan acknowledges the connections of London with the wider area, policy SD2 and SD3 set out the importance of collaboration with authorities in the Wider South East (WSE) and the growth locations in the WSE. Figure 2.15 and paragraph 2.3.6 set out the infrastructure priorities that enable the WSE to connect to growth areas in London. The London Plan should also set out how outer London growth areas interact with the WSE as the plan does not currently refer to this at present.

The London Plan is very clear that it aims to accommodate all of London's growth needs within its boundaries (para 2.3.1) without intruding on its green belt or protected open spaces. Meeting London's needs within London places pressure on outer London Borough's in particular to accommodate growth, having a major impact in terms of intensification and through accommodating growth on small sites. We would question how realistic it is that outer London can achieve this significant growth through a heavy reliance on small sites alone, and would also suggest that if small sites can be brought forward in significant numbers, the London Plan needs to be clear on what sort of place outer London will become. Small site housing growth could have a significant cumulative effect on transport and other infrastructure, so this growth needs to be supported by appropriate infrastructure provision.

User: Boka Hotel

Dear Mr Mayor

My comments are about the Earls Court area and the planned development by Capco now on hold . I will make some comments on how that permission was obtained before making my comments and suggestions.

As we know permission was given to capco to demolish the Exhibition Centre which as follweod by a worrying display of joy from an RBKC Planning Offcir who pubicly hugegd and kissed Capco members when permission was granted , not the normal planning application behaviour to my mind ?

English Heritiage was approached about listing the centre , they hired a consualtant and he deiced it wa sof no significance and should be demolished.What was never mentioned or disclosed was that Richard Coleman (his name comes up in lots of enquiries over the years) who has a history of stating buildings are of no interest to save (when developers want to build somewhere) had/has the Earls Court owners Capco and DP9 Capcos planning agents as clients of his own firm at the time of carrying out the report so a complete conflict of interest. So English Heritage issued a Certificate of Immunity from Listing earls Court as apparently it was of no interest at the same time as they listed a concrete skateboard park in East London, the mind boggles

Many lcoal residents have suffered form the noise , night time working which athe same planning officer at RBKC told the planning commitee they had to ignore residnets objections , dust and loss of business locally. We also object to capco now having huge boards classifying Earls Court as a New District for London when it has existed for hundreds of years

Having made my points about how we got here I would now like to give you my comments on what I belive should happen and what I belive the mayor should look at seriously

This is what I belive should happen to the Earls Court area for the benefit of local residents, local business , the benefit of London in genral from an income poitn of view and those who visit the area.

1 - Build a replacement exhibition / conference / sporting / music venue (a world class green venue that with its green credentials would be a destination in its own right) on what was Earls Court 1 (London is lacking exhibition space and Excel is not popular), a replacement world class venue was what the council originally stated and promised in their forward plans a few years back. This would put Earls Court back on the map for all the right reasons.

The exhibition industry was always against the demolition as it is crying out for space, London lost £1 billion income per annum due to the demolition and the city and the local area especially needs this income back, an exhibition centre brings overnight hotel stays which in turn brings business for local pubs and restaurants etc.

2 - Leave the West Kensington and Gibbs Green estates as they are to be managed by the residents which I believe is their ultimate wish

3 - Leave the Police in the Empress State building as opposed to kicking them out and turning it into a tower of luxury flats, I mean there are about 4000 staff there losing them will do more harm to local business than has already been done, and people like to feel safe the presence goes some way to fulfill that. Also, to empty the building would mean the Mayor having to find space for 4000 staff around London, an unnecessary move when they may soon own the building.

4 - Then what was Earls Court 2 should build housing etc. there which should be a mix of private, social and affordable housing along with other facilities such as a Post Office, GP, Community Centre etc.

5. It has been mentioned that in order to utilize the space in the coming years instead of developing which Capco can now no longer afford that it could be used as a car park or container yard. A car park would bring too much traffic to the area and serve no purpose to local people and a container yard would mean 24/7 noise and disruption with large lorries swapping the area and creating traffic chaos. If either of these uses was permitted we would see pollution from the increased traffic when the area is already above guidelines. Did we really lose such a profitable venue for a car park? This option would be oppsoed by all locals

Those are the points I would like to make and I do hope they will be taken on board

Regards

Spencer Parsons

User:	Chessington World of Adventures

4 Kingston Opportunity Area

The growth strategy for Kingston is supported, although should include specific reference to the role that is played by the tourism and leisure sectors in the visitor economy of the area.

User:	BA Pension Trustees, Nationwide Pension Fund Trustee & National Grid UK Pension

The consortium support the spatial framework within the Draft London Plan, which seeks to ensure that OA's realise their full growth potential by linking them to the delivery of strategic transport infrastructure projects to create Growth Corridors. The consortium supports the Mayor's commitment to delivering Crossrail 2, which has the potential to support 200,000 new jobs, as well as unlocking 200,000 additional new homes. The effective functioning of the industrial policies in the draft London Plan are key to unlocking land for development that realises the full potential of OAs and justifies the investment in strategic transport infrastructure.

User:	Canary Wharf Group

16.The 110,000 employment target for the Isle of Dogs Opportunity Area set out in Figure2.11 should be revised. The employment target for the Isle of Dogs hasn’t changed fromthe 110,000 target first set out in the 2008 London Plan. Rolling over of this target doesnot recognise the significant increase in employment within the Isle of Dogs OpportunityArea of 44,700 jobs since the 2008 London Plan. By contrast, employment targets forother Opportunity Area’s, such as London Bridge, Waterloo, VNEB and the City Fringewhere ambitious growth is planned and being delivered, have been updated.

User:	Primrose Hill Conservation Area Advisory Committee

SD1 A 1 Our proposed amendments – reasoning: Our proposed revised text would ensure consistency with the rest of the Plan, and with the Plan's stated heritage objectives.
Our proposed revised text: to add a new d) after c) and before present d): 'd) protect and strengthen heritage assets and the areas' distinct and varied character'

SD1 B Our proposed amendments – reasoning: we are very concerned (see above) that the opportunity areas are inadequately defined, leading to alarm in local communities as local areas are seen as under ill-defined but general threat. Our objective is to have the clearest possible boundaries, defined at the earliest opportunity in collaboration with local communities, and so consistent with the Mayor's stated objectives for collaborative working with local communities.
Our proposed revised text: To add to SD1 B a new point 1: 'Clearly define the boundaries of the Opportunity Areas within their Borough Plans in collaboration with local communities'.

SD1 B Our proposed amendments – reasoning: Our proposed revised text would ensure consistency with the rest of the Plan, with the Plan's stated heritage objectives, and with the Mayor's stated objectives for collaborative working with local communities.
Our proposed revised text: after 4) and before 5), proposed new '5)': '5) preserve and enhance heritage assets, settings, and character in and adjacent to the Opportunity Areas, working in collaboration with local communities'

User: Primrose Hill Conservation Area Advisory Committee

Para 2.1.66 p. 53 Text on Euston Opportunity Area (no. 39)

Draft text: ‘Scope exists to reconfigure Euston Square Gardens’.

Our proposed amendments – reasoning: We propose the deletion of the reference to ‘reconfigure’, and further revision, to ensure consistency with the Euston Area Plan (formally adopted) and avoid a loss of trust in democracy. This Draft proposal is not included in the Euston Area Plan, and the adoption of this statement would tend to pre-judge an issue which is subject to future due process, including public consultation, by the London Borough of Camden.

Our proposed revised text: Scope exists to ~~reconfigure~~ improve Euston Square Gardens, and by reducing the impact of the bus station, to enhance this space and improve transport facilities, respecting its historic footprint whilst prioritising sustainable transport modes for onward travel, with a focus on the creation of Healthy Streets.

User: London Assembly Planning Committee

Recommendations – engagement

- We would like to see a greater focus on ensuring local people are engaged in planning and during development. As such we would like to see the following wording changed on Policy SD1 A1c: “support regeneration through genuine engagement with local residents and stakeholders to ensure economic vitality and development of relevant social infrastructure”.
- We would also like to suggest the following addition policy as SD1 B2: “support local stakeholders to meet local aspirations in Opportunity Areas, including providing guidance and ensuring effective engagement during development”.

3.24 The Regeneration Committee has been consistent in its support for engaging with communities on major regeneration projects. This has been a recurring theme that the committee has heard throughout its investigations, most recently in its 21 November 2017 meeting on town centre regeneration11 and at an informal roundtable on the OPDC on 17 January 2018. In particular, the committee’s meeting on 1 March 2016 on public consultation and its impact on regeneration projects highlighted how a failure to properly consult with people lead to uncertainty for communities and resistance to development proposals at Brent Cross Cricklewood.12

3.25 By highlighting the importance of community engagement in the London Plan, developers in Opportunity Areas are more likely to consult with local people. This could help improve the quality of proposed developments and improve relations between developers and communities.

User: Regent's Park Conservation Areas Advisory Committees

Major concern: we are very concerned that the definitions of areas for growth, both Opportunity Areas and Strategic Areas for Regeneration are not sufficiently precise. So Figure 2.1, read with Figure 2.3, and Figure 2.11 indicate, but do not define, Euston as well as King's Cross as Opportunity Areas. The figures also show much of Camden, including comparatively prosperous areas, and areas of considerable local distinctiveness, as broad Strategic Areas for Regeneration. This is seen as threatening by local communities.

SD1 A 1 Our proposed amendments – reasoning: Our proposed revised text would ensure consistency with the rest of the Plan, and with the Plan's stated heritage objectives.
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Policy SD2 Collaboration in the Wider South East

User: North London Waste Authority

- NLWA supports the recognition of the need for this wider collaboration - including on waste issues.
- We note the increase in population predicted in the wider south east and therefore the need to co-ordinate our response to growing amounts of waste as a result in a cooperative way.
- Within this context it is important that the NLP is clear that the references it contains are to net self-sufficiency and so incorporate the natural movements within the region that already take place as part of the normal arrangements of doing business within the wider south east. This is a point we make across the draft NLP.

User:	North London Waste Authority

- NLWA supports these arrangements and urges continuation within the NLP.

User:	Barnet Society

Policy SD2 – Collaboration in the Wider South East

In view of our close links with Hertfordshire, we are glad the Mayor intends to work with partners across the WSE on transport and other issues facing the WSE. We would like to see explicit commitment to improving and harmonising cross-border transport planning and Oyster usage, especially with regard to bus connections between town centres, transport hubs, hospitals, schools and colleges.

User: Central Bedfordshire

Policy SD3: Collaboration in the Wider South East

We welcome the acknowledgement that the effects of London's housing and labour markets and their related multiplier effects extend far beyond its administrative boundaries, and the commitment to work with Wider South-East partners to find solutions to shared strategic concerns. As you know Central Bedfordshire is already one of the most highly connected areas, and given its unique location in the centre of the Oxford-Cambridge Arc, there are a number of key opportunities that Central Bedfordshire is positioned to take full advantage of; including the proposed East West Rail Link (EWR), the Cambridge-Milton Keynes-Oxford Arc and associated high tech employment led growth. We therefore strongly welcome the reference to East West Rail and new Expressway road link (Oxford - Cambridge) in your list of strategic infrastructure priorities.

However, we have concerns regarding the housing deficit identified above, and how this issue will be addressed. On this point, the Plan states that "given the pressure for growth in both London and the Wider South East, the barriers to housing delivery that need to be overcome to avoid a further increase of the backlog, and potential changes to projections over time, it is prudent to plan for longer-term contingencies. Therefore, the Mayor is interested in working with willing partners beyond London to explore if there is potential to accommodate more growth in sustainable locations outside the capital." This suggests the Plan may be placing reliance on "willing" authorities beyond London to meet its unmet housing needs, though it is not explicit in saying this. Indeed, the reference to "longer term contingencies" suggests that this may refer to the period post-2029. Whilst we welcome the commitment to informal partnership working, we seek clarification concerning what the Plan's intentions are in relation to this section of the Plan, specifically whether the measures – for example is it accommodate unmet needs arising now, or post 2029 - and the redrafting of this policy and supporting text to reflect

Policy SD3 Growth locations in the Wider South East and beyond

User:	East of England Local Government Association

The Draft London Plan states that London "*aims to accommodate all of London's growth within its boundaries without intruding on its Green Belt or other protected open spaces. As with any successful urban area this does not mean that in- and out-migration will cease, but that as far as possible sufficient provision will be made to accommodate the projected growth within London.*" (2.3.1). Councils in the East of England broadly support this commitment.

User:	Surrey County Council

In addition, we are concerned that the Plan only makes provision for the delivery of around 65,000 additional homes a year to 2028/29 against an assessed housing need of about 66,000 homes a year with no demonstrable strategy to meet the shortfall. The emphasis on higher density development and smaller units could have implications for Surrey since previous under-delivery in London and lack of affordable family units has added to housing pressures in Surrey districts and boroughs with associated implications for infrastructure in the county.

User: Surrey County Council

The London Plan should therefore be accompanied by both a robust monitoring framework and a risk management plan that should be developed with WSE partners. These would inform partnership working between London and the WSE on strategic concerns such as barriers to housing and infrastructure delivery (Policy SD2 E) and with willing partners to identify growth locations as longer term contingencies to accommodate growth (Policy SD3).

In terms of risk management, specific agreements could be developed with groups of authorities in London and authorities in Surrey, particularly for some of the proposed OAs close to London's boundary which are likely to have significant implications for adjoining areas in Surrey, most notably the Kingston OA. Such agreements could give greater confidence in joint action, for example to ensure that sufficient capacity can be delivered on cross border transport and enabling infrastructure which would be of mutual benefit.

User: Surrey County Council

To support the implementation of Policy SD3, there is also a need for guidance that sets out how the Mayor will collaborate with willing partners on sustainable growth locations which will meet local as well as wider growth requirements and help deliver strategic infrastructure. An active approach to find willing partners should be promoted in order to secure these mutual benefits and avoid additional pressure on local plans in areas with significant constraints to allow for the effect of migration arising from London's unmet housing needs. Much of Surrey is subject to environmental constraints such as Areas of Outstanding Natural Beauty, Special Protection Areas and flood risk as well as Green Belt constraints that restrict the ability of the districts and boroughs to accommodate their own housing needs let alone London's unmet needs as set out in the Interim Surrey Local Strategic Statement 2016 – 2031.

The supporting text to Policy SD3 needs to make it clear that the 13 WSE strategic infrastructure priorities agreed by the GLA and South East England and East of England councils as being in need of investment now to address current congestion and capacity issues are not being proposed as growth corridors. There should not be any suggestion that there are potential opportunities in Surrey along the strategic infrastructure priorities indicated as continuing outwards from London's growth corridors to meet London's unmet needs.

User:	Crest Nicholson PLC

We consider this Policy to be unsound and ineffective as currently drafted and amendments are required.

Our comments in relation to SD2 are applicable here too and Policies SD2 and SD3 needs extensive reconsideration in light of our comments and those of the HBF.

User: Reigate and Banstead Borough Council

The council welcomes the Collaborative approach in developing the Wider Southeast referred to in SD2, 3 ,4 and the details on growth corridors and strategic infrastructure priorities. These are matters which affect the /borough and are addressed in the responses referred to at the beginning of this commentary by the Gatwick Diamond Authorities and Surrey Planners.

At the Borough level there are particular challenges and a need for ongoing collaboration between Boroughs and Districts in the adjacent metropolitan green belt with the corresponding outer London boroughs. The New London Plan should recognise this explicitly.

The emphasis on achieving additional housing in opportunity areas is questioned in relation to delivery. There are significant issues involved in these areas. When taken with the densification emphasis there is doubt on the ability to deliver particularly in the early stage of the Plan. This could perpetuate and exacerbate migration flows from London to areas such as Reigate and Banstead leading to higher land values and house prices and pressure on specific types of housing in high demand and short supply such as housing and family

housing.

The council welcomes the Mayor’s policies on greater scrutiny and challenge on viability study evidence. This will assist the transformation of the housebuilding industry and the housing land market and is therefore of direct benefit also to areas outside of London.

User: Oxfordshire County Council

OCC also welcomes in principle Policy SD3 which sets out the Mayor's commitment to work with WSE partners, Government and other agencies to realise the potential of the wider city region and beyond through investment in strategic infrastructure to support development in growth locations to meet need and secure mutual benefits.

Fig 2.15 highlights thirteen initial WSE Strategic Infrastructure Priorities endorsed by the WSE partners for initial delivery; it should be noted that further work is to be undertaken by WSE to refine these priorities. OCC is willing to work in partnership with the Mayor to press for funding and the accelerated delivery of strategic infrastructure. Our interest focuses on the delivery of:

- The orbital routes of the Oxford-Cambridge growth corridor - East West Rail
and the Oxford-Cambridge Expressway - which would improve east-west connectivity and take the
pressure of radial road and rail routes through north
and west London; and

- The Great Western Mainline (London-Reading/Western rail Access to Heathrow) which will provide
greater connectivity for Oxfordshire via rail services from Reading.
services from Reading.

Para 2.3.4 of the draft Plan advocates a need to plan for longer term contingencies and sets out the Mayor's interest in working with willing partners beyond London to explore if there is potential to accommodate more growth in sustainable locations outside the capital in return for support for infrastructure provision. For this approach to succeed it would be helpful if London could first demonstrate that it has explored all reasonable options for accommodating development within its boundary, including through a Green Belt review.

To meet commitments in the Oxfordshire Housing and Growth Deal, the Oxfordshire authorities will focus resources on:
• ensuring the delivery of 100,000 homes by 2031 to meet Oxfordshire's needs as identified in the Oxfordshire SHMA 2014; and
• the production of the Joint Statutory Spatial Plan for Oxfordshire to 2050 for adoption by 2021.

The SHMA’s 100,000 homes for 2011-31 is based on supporting economic growth and is an up-lift of some 24,300 homes on the level of provision needed to meet demographic-based forecasts for Oxfordshire. It is reasonable to assume that a proportion of in-migrants to Oxfordshire’s growing workforce will originate in London. It is also likely that a proportion of the new homes being planned in locations in Oxfordshire that have good public transport links to London eg Didcot, Bicester and close to Oxford Parkway will be occupied by London commuters. In effect Oxfordshire is already likely to be assisting in meeting London’s housing needs through its current round of local plans.

User:	Buckinghamshire District Councils & Bucks Thames Valley Local Enterprise Parthership

We welcome the London Plan emphasis on willing partners for housing and/or economic growth in the wider South East and beyond, but the Plan should set out how the policies will be implemented. The London Plan should also include a clear and unambiguous policy commitment that, in the event the Mayor is not able to enter into partnerships that will deliver sufficient and timely growth to accommodate any shortfall between London's development needs and development capacity to 2039, then the whole of the shortfall will be provided for within the Capital. (Draft London Plan Policies SD2 & SD3)

User: Buckinghamshire District Councils & Bucks Thames Valley Local Enterprise Parthership

Collaboration with the Wider South East

12. Aylesbury Vale DC, Chiltern DC, South Bucks DC, Wycombe DC and Bucks Thames Valley LEP have reached agreement as to how Buckinghamshire's housing and employment needs will be accommodated in local plans in the county up to 2033. Evidence shows that housing need originating in Chiltern, South Bucks and Wycombe Districts will exceed their capacity due to constraints including Green Belt and AONB. The unmet housing need originating in southern Buckinghamshire will be provided for in the Vale of Aylesbury Local Plan. Linked to this, there will be a redistribution of economic growth from the three southern districts to Aylesbury Vale District. The level of housing growth that Aylesbury Vale DC is expecting to deliver to 2033 is ambitious but achievable. Aylesbury Vale is already delivering large numbers of homes into the market; its new housing supply outperformed all other authorities in the Cambridge – Milton Keynes – Oxford Corridor between 2011 and 2015. To build upon this track record and deliver homes at the rates required to meet Buckinghamshire's needs amounts to a step-change in housing delivery in Aylesbury Vale and will require a large number of actions to be taken by a range of different partners. It means that there will be no scope to meet the development needs of London within Buckinghamshire.

13. We welcome the London Plan emphasis on joint working between the Mayor and willing partners for housing and/or economic growth in the wider South East and beyond, where investment in strategic infrastructure has the potential to support development and secure mutual benefits for London and the partner(s) concerned. Though the Draft Plan acknowledges the strategic and longer-term nature of such partnerships, including investment in public transport and the likely need to secure infrastructure funding to unlock opportunities, no specific partnerships are referenced in the Draft Plan. Nor does the Draft Plan explain how the 'willing partner' process will work in practice. Further detail is required in the text supporting Policy SD3 in order to avoid creating uncertainty in the wider South East and to avoid unnecessary risks for London's future success. The Plan should also include a clear and unambiguous policy commitment that in the event the Mayor is not able to enter into partnerships that will deliver sufficient and timely growth to accommodate any shortfall between London's development needs and development capacity to 2039, then the whole of the shortfall will be provided for within the Capital.

User: Persimmon Homes

The draft London Plan is proposed to provide the development framework for London for the next 20-25 years (i.e. 2038-43). As a strategic plan for a major global city it is appropriate to look at how the city will evolve and manage growth over this period. Clearly accommodating growth will require long term investment decisions. Despite this, housing targets in Policy H1 operate solely for the period 2019-29. Furthermore, the assessment of housing capacity only assesses the period up to 2029. It has not been demonstrated that London can sustain growth of 65,000 dpa within London's footprint post 2029.

The London Plan should provide a spatial plan to accommodate growth over the next 20-25 years. However, it fails to adequately detail and evidence how it will achieve this and the extent to which London will rely upon the wider South East and Eastern Region post 2029 to accommodate housing and employment growth.

For those authorities outsider of London, the plan brings significant uncertainty as to how the Capital's growth will be accommodated post 2029 and the extent to which their own development plans should seek to meet London's Housing needs post 2029.

User: Central Bedfordshire

Policy SD3: Collaboration in the Wider South East

We welcome the acknowledgement that the effects of London's housing and labour markets and their related multiplier effects extend far beyond its administrative boundaries, and the commitment to work with Wider South-East partners to find solutions to shared strategic concerns. As you know Central Bedfordshire is already one of the most highly connected areas, and given its unique location in the centre of the Oxford-Cambridge Arc, there are a number of key opportunities that Central Bedfordshire is positioned to take full advantage of; including the proposed East West Rail Link (EWR), the Cambridge-Milton Keynes-Oxford Arc and associated high tech employment led growth. We therefore strongly welcome the reference to East West Rail and new Expressway road link (Oxford - Cambridge) in your list of strategic infrastructure priorities.

However, we have concerns regarding the housing deficit identified above, and how this issue will be addressed. On this point, the Plan states that "given the pressure for growth in both London and the Wider South East, the barriers to housing delivery that need to be overcome to avoid a further increase of the backlog, and potential changes to projections over time, it is prudent to plan for longer-term contingencies. Therefore, the Mayor is interested in working with willing partners beyond London to explore if there is potential to accommodate more growth in sustainable locations outside the capital." This suggests the Plan may be placing reliance on "willing" authorities beyond London to meet its unmet housing needs, though it is not explicit in saying this. Indeed, the reference to "longer term contingencies" suggests that this may refer to the period post-2029. Whilst we welcome the commitment to informal partnership working, we seek clarification concerning what the Plan's intentions are in relation to this section of the Plan, specifically whether the measures – for example is it accommodate unmet needs arising now, or post 2029 - and the redrafting of this policy and supporting text to reflect

Policy SD4 The Central Activities Zone (CAZ)

User: New West End Company

5 The need to for policies to actively promote growth in the West End

5.1 The continued success of the West End International Shopping Centre cannot be taken for granted. It faces many challenges which together demand that the London Plan should promote policies that actively encourage and enable good growth :
? continuing international competition, from established and emerging centres;
? growth of online retailing;
? changes in consumer expectation;
? the need to evolve and integrate the combined retail, entertainment and commercial elements of the West End; and
? uncertainty over Brexit.

5.2 West End retailers traded well in the first half of 2017 due to the immediate currency effects, however Q4 saw sales fall by 10.5%17. According to research by Moore Stephens18, a Top Ten accountancy firm, 19 per cent of UK clothing retailers currently exhibit early warning signs that they are at risk of going insolvent. Moore Stephens comments that rising business rates (estimated to cost businesses an extra £5 billion by 2021-22) has meant many fashion retailers have increased prices or lowered profit margins to meet these costs. This has been worsened by an increase in staff costs after the introduction of the National Living Wage. Fashion retailers have been hit by the perfect storm of rising costs, falling consumer spending and increased competition. All three have heaped pressure onto revenue and made profit margins difficult to maintain and limit the amount of capital investment into stores and buildings.

5.3 The West End Partnership, says of the West End “The West End’s unique and rich mix of businesses, urban neighbourhoods, cultural attractions, leisure and hospitality, and cutting-edge, internationally-recognised commercial sectors, makes the area uniquely challenging to support. But it is precisely this rich diversity that makes the West End a special place, a magnet for millions of visitors and hundreds of thousands of jobs. In the face of growing and intense international competition and constrained public finances, the West End needs both a strong vision and a strong voice to secure its growing success.

5.4 The London Plan should recognise the need to support actively the continued growth of the West End and include within in a wider range of more detailed policies to ensure that business and the public-sector work together to enable and encourage its growth.

15 Online version of Second Round Consultation Paper, November 2017
16 “Have your Say On the Transformation of Oxford” - The transformation of Oxford Street in context. https://consultations.tfl.gov.uk/roads/oxford-street/
17 New West End Company trading reports
18 Moore Stevens – 19% of retailers at risk of insolvency. https://www.moorestephens.co.uk/news-views/february-2018/19-of-fashion-retailers-show-signs-of-insolvency

User: New West End Company

New West End Company believes that there are four ways in which the London Plan should more effectively support growth of the West End, meeting the commitment made to in the Oxford Street Transformation consultation response. We accept that the detail of some of our proposals may be more appropriately addressed in emerging local plans but, given the strategic nature of the International Shopping Centres, we believe that more guidance should be given in the London Plan.

6.2 Define more precisely the geographical extent of the International Shopping Centres. Provide clear and detailed geographic definition of the International Shopping Centres to enable targeted growth policies to be applied. This would more easily enable the classification to be used to target local, regional and national growth policies designed to recognise and support the unique position of the International Shopping Centres. While this is a matter for local plans believe that the London Plan should encourage this to be addressed in those plans.

User:	New West End Company

The Plan should provide a clear acknowledgement of the importance of the West End to the future growth and wellbeing of London and the wider UK. Recognise and highlight the importance of the West End to the economic and social wellbeing of the whole of London and the wider UK, together with the need for continual investment to retain its global position, so that local and national growth policies appreciate the importance of prioritising the growth needs of the International Shopping Centres.

User:	New West End Company

The Plan should **provide a clear and detailed definition of the attributes and content of the International Shopping Centres and how these integrate with the international entertainment and commercial districts and the local residential community.** This would guide planners and business to ensure that all elements of West End growth work together to produce the best possible environment to invest, work, visit and live.

User:	New West End Company

The Plan should **provide clear and detailed guidance to local planning authorities on what uses are and are not appropriate to ensure good growth and meet the Mayor's jobs growth targets in International Shopping Centres.** In our response to proposals for the transformation of the Oxford Street District consultation we identified two core growth limiting issues – a shortage of commercial workspace and evolving retail trends and fierce global competition. Below we make specific proposals for each issue, aimed both at the Mayor and Westminster City Council [See comments on GG2]

User: New West End Company

Growth-limiting issues - Evolving retail trends and fierce global competition
6.21 Planning policy needs to enable the International Shopping Centre to grow and develop in ways that respond to and build on evolving national and global retail trends. New West End Company proposes five key areas for policy guidance.

Encourage a broader range of uses including leisure, culture and civic amenities

6.22 The core West End (Oxford Street, Regent Street and Bond Street) is currently largely dominated by retail with office uses above. In accordance with best practice from other world leading cities and retail centres, there needs to be a broader range of leisure, cultural and civic uses which will improve the wider offer within the International Centre. We need to enhance the West End's identity and attraction to a wide range of visitors and increase the dwell times within the district, including during the evening. Such uses would be expected within an International Centre given the number of visitors, and they are critical to realise fully the area's potential during the day and evening, especially given its exceptional public transport accessibility. WCC's current strict retail policies need to be suitably amended to enable Oxford Street, Regent Street and Bond Street to evolve in ways that appeal to modern day shoppers.

Expand the boundaries of the International Shopping Centre and West End Special Retail Policy Area

6.23 There is clear potential to expand the boundaries of the International Shopping Centre and WESPRA to surrounding streets reflecting the significantly enhanced pedestrian movements post Elizabeth Line. These nearby streets will play a key role in enhancing the overall function of the Oxford Street district. They can help to provide the mix of uses needed to transform Oxford Street into a modern retail district. Indeed, with some entrances/exits to the Elizabeth Line stations being one block back from Oxford Street, these streets will automatically acquire a new role, character and set of movement patterns.

Promote the evening economy of the Oxford Street District
6.24 The evening economy across the District is limited and Oxford Street itself is largely inactive once the major retailers close. There is the potential for significant enhancement of the evening economy in the District and along Oxford Street in particular (being relatively unconstrained in terms of residential uses). These will have a major beneficial impact upon retail trade in the evening and as part of the supporting offer for the District.

6.25 The Plan should promote planning policy that is sufficiently flexible to allow different uses at different times of the day throughout the key shopping streets.
Develop and promote a cultural strategy

6.26 Similarly, a cultural strategy for the Oxford Street District, including Regent Street and Bond street, is required to add to the wider attractiveness of the district, particularly as part of the evening economy.

Prepare planning and design guidance that will help deliver the long-term aspiration
6.27 In contrast to the defined Opportunity Areas, there is very limited specific planning policy for the main shopping streets of Oxford Street, Regent Street and Bond Street. Given the scope for growth, place-making and district-wide collaboration, and the cross-borough spread of the International Shopping Area there should be explicit positive policy support by both WCC and the Greater London Authority.

6.28 In addition WCC-led planning and design guidance should reflect the aspiration for the District and provide a specific focus upon the identified urban zones and key sites to ensure that the principles are incorporated into new development proposals.

User: East of England Local Government Association

The policy emphasis on offices is understandable given London's forecast growth in office-based employment of 619,300 over the 25 years of the plan. At 24,772 per annum, this is 64% more than the 15,150 per annum in the current adopted plan. The LSE's review of research noted the relationship between London's employment growth and commuting and highlighted that managerial-technical occupations account for over 75% of net commuting into London and the entire growth in net inward commuting between 2004 and 2016 (LSE, Review of Research on Migration Influences and Implications for Population Dynamics in the Wider South East, page 78). Given that London's own research highlights that most (288,800) of the increase in office employment will occur in the Central Activity Zone, and that commuting from the WSE is so significant, there is a clear need to deliver a wide range of transport measures to meet this increase in demand.

The Draft London Plan places the potential for Stratford to act as a satellite for major office space but only after demand has exceeded the capacity of the Central Activity Zone and the Northern Isle of Dogs. The London Plan should be setting a positive framework to facilitate development and this hierarchy should not restrict the potential for "good growth" to occur in these satellite locations even if there is capacity within the other areas.

User:	Moorfields Eye Hospital NHS Foundation Trust & UCT Institute of Opthalmology

Policy SD4 The Central Activities Zone (CAZ) sets out that *"The unique international, national and London-wide roles of the CAZ, based on an agglomeration and rich mix of strategic functions as well as local uses, should be promoted and enhanced.*" And *"(G) The CAZ as a centre of excellence and specialist clusters including functions of state, health, law, education, creative and cultural activities, and other more local Special Policy Areas should be supported and promoted."*

The supporting text sets out the strategic priorities of the CAZ. These include but are not limited to: (e) centers of excellence for higher and further education and research, and (f) centers of medical excellence and associated specialist facilities.

We welcome the strength of policy support for education, research and medical excellence. However, it is not definitively clear whether the preferred St Pancras Hospital site sits within the CAZ or adjacent to it. If it is the latter, we would strongly urge the CAZ boundary to be extended to include the entirety of the preferred St Pancras Hospital site given its future development potential as a new home for Moorfields and UCL and also for the other parts of the site.

User: Silvertown Homes

Part K of this policy states that ‘The attractions of predominantly residential neighbourhoods, where more local uses predominate, should be conserved’. Paragraph 2.4.17 states ‘The quality and character of the CAZ’s predominantly residential neighbourhoods should be conserved and enhanced.’

‘Conserve’ is not the appropriate word to use in this context. Its meaning in planning terms relates to heritage assets and not to land use or sense of place more generally.

Part K of this policy and the supporting text should be redrafted.
From a strategic perspective it is crucial that within the CAZ strategic policy objectives including the economic, social and environmental case for the optimisation of land for all uses (residential and non-residential) is given appropriate weight when this is to be balanced against the ‘quality and character’ of residential neighbourhoods.

The term ‘character’ must also be explicitly defined in this context.

User: Benhill Residents

While policy SD4 says this area should be promoted and enhanced as an international, national and London-wide role in terms for its culture, arts and entertainment, the area is also home to many social housing estates and is an example of the worst aspects of polarisation - extreme wealth and poverty sitting cheek by jowl. It is a place where there are streets of expensive restaurants, where in some, a starter might cost as much as elderly residents on local council estates have to spend on food in a week.

In some parts of the CAZ where there has traditionally been a large number of supporting voluntary sector organisations (such as in Kings Cross). However, evidence shows organisations such as this have, or are been forced relocate as they are no longer able to meet local costs, reducing support for local communities.

The needs of many less well-off members of society living in the CAZ (and whose families may have lived there for generations) find other problems relating to living adjacent to luxury apartments – including loss of access to affordable sports, leisure, play and youth facilities, shops, services and other amenities that met their local needs.

Policy SD4 should acknowledge this. It should also require that boroughs acknowledge this in their development plans and that they provide support in retaining social housing communities in the CAZ as well as affordable workspaces for shops and businesses that lower income households are dependent on.

The pressure in terms of property prices mean that buy to let and Airbnb is high on local authority estates – creating transience and sometimes divisions in neighbourhoods where there were once strong and stable predominantly working-class communities.

We propose that SD1K should be replaced with **'local residential neighbourhoods in the CAZ should be conserved – particularly those servicing the needs of low income households in terms of homes, jobs, shops services and amenities. Boroughs should support and protect these areas in full consultation with the existing local communities.**

User:	Catalyst Housing Limited

The need for some flexibility is also relevant to draft Policy SD1 B (5) and draft Policy SD4 M.

User: Elaine Chambers

Policy SD4 The Central Activity Zone CAZ

While policy SD4 says this area should be promoted and enhanced as an international, national and London-wide role in terms for its culture, arts and entertainment, the area is also home to many social housing estates and is an example of the worst aspects of polarisation - extreme wealth and poverty sitting cheek by jowl. It is a place where there are streets of expensive restaurants, where in some, a starter might cost as much as elderly residents on local council estates have to spend on food in a week.

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User: The Crown Estate

We support the Alliance's suggestion that the draft Plan should more strongly recognise the importance of the West End and its significant strategic importance to the economic health and cultural identity of London as a global city.

In recent years, the nature and type of retail has changed and increasingly, consumers are seeking retail 'experiences' and a broader range of attractions alongside and within shopping units. We consider it essential that London is able to respond to this demand, in order to compete with other shopping destinations globally. Within London itself, the West End needs to be able to respond to increased competition from outer London and beyond where shopping centres are increasingly offering supplementary attractions to consumers. Enabling a variety of uses and encouraging more leisure and cultural uses within traditional shopping zones will help with this.

With retail frontages themselves, traditional land use policies have sought to protect Class A1 retail and rigidly dictate the range of suitable uses. This approach is no longer appropriate for the kind of retail that should be promoted within London's key shopping areas. Many retail stores (especially flagship stores) are now looking for some 'unique selling points' that they can offer their customers in order to make them distinctive and to help attract footfall and interest. These additional offerings could include, for example, ancillary coffee shops/restaurants, lounge and bar areas, barber and beauty services, tailoring and measuring services etc. The mix of uses often does not fit neatly within the Use Classes Order definitions which can often present a planning issue when dealing with inflexible land use policies.

The West End is extremely well-connected, internationally renowned and of significant importance to London's economy. The draft Plan should therefore look to promote the West End and in doing so, should recognise that there must be flexibility when applying land use policies to retail frontages. This will enable a broader range of retail activities and spaces to come forward which will assist in delivering a West End that is more active and more prosperous for London and that encourages innovation.

User: Historic England

We support the reference in Part C to sustaining and enhancing the heritage of the CAZ. We also note and welcome references in paras 2.4.4 and 2.4.7 recognising strategic elements – the River Thames, The Royal Parks, World Heritage Sites, designated views and the unique concentration of heritage assets in the CAZ. However, we feel greater emphasis in policy, and leadership form the Mayor is also called for to ensure these exceptional assets are protected for the future.

We support para 2.4.9 and 2.4.13 references to heritage which demonstrate the strong connections between character, heritage and cultural activity.

Please refer to our comments relating to the Royal Parks and the River Thames in Chapters 7, 8 and 9.

User: Royal London

Policy SD4 – The Central Activities Zone

RL are supportive of the overall objectives of the specific spatial policy for the Central Activities Zone. RL have a number of assets within the CAZ and welcome the policies which recognise the importance of supporting and enhancing the nationally and internationally important office functions of the CAZ.

In recognition of the importance and opportunity of the CAZ we advise that the policy should include a more positive statement regarding development intensification and optimisation within this area given its excellent accessibility. It is noted that draft policy D6 provides a clear requirement in relation to residential development that this must make the most efficient use of land and to be developed to optimum density for all uses. We request that a similar requirement is introduced within policy SD4 requiring development in the CAZ to optimise density and make the best use of land. The current wording within SD4 part B seeking ‘intensification’ is insufficient in this regard and simply relates to office development.

User: Reigate and Banstead Borough Council

The council welcomes the Collaborative approach in developing the Wider Southeast referred to in SD2, 3 ,4 and the details on growth corridors and strategic infrastructure priorities. These are matters which affect the /borough and are addressed in the responses referred to at the beginning of this commentary by the Gatwick Diamond Authorities and Surrey Planners.

At the Borough level there are particular challenges and a need for ongoing collaboration between Boroughs and Districts in the adjacent metropolitan green belt with the corresponding outer London boroughs. The New London Plan should recognise this explicitly.

The emphasis on achieving additional housing in opportunity areas is questioned in relation to delivery. There are significant issues involved in these areas. When taken with the densification emphasis there is doubt on the ability to deliver particularly in the early stage of the Plan. This could perpetuate and exacerbate migration flows from London to areas such as Reigate and Banstead leading to higher land values and house prices and pressure on specific types of housing in high demand and short supply such as housing and family

housing.

The council welcomes the Mayor’s policies on greater scrutiny and challenge on viability study evidence. This will assist the transformation of the housebuilding industry and the housing land market and is therefore of direct benefit also to areas outside of London.

User: Earls Court Public Sector Tenants' Assoc

While policy SD4 says this area should be promoted and enhanced as an international, national and London-wide role in terms for its culture, arts and entertainment, the area is also home to many social housing estates and is an example of the worst aspects of polarisation - extreme wealth and poverty sitting cheek by jowl. It is a place where there are streets of expensive restaurants, where in some, a starter might cost as much as elderly residents on local council estates have to spend on food in a week.

In some parts of the CAZ where there has traditionally been a large number of supporting voluntary sector organisations (such as in Kings Cross). However, evidence shows organisations such as this have, or are been forced relocate as they are no longer able to meet local costs, reducing support for local communities.

The needs of many less well-off members of society living in the CAZ (and whose families may have lived there for generations) find other problems relating to living adjacent to luxury apartments – including loss of access to affordable sports, leisure, play and youth facilities, shops, services and other amenities that met their local needs.

Policy SD4 should acknowledge this. It should also require that boroughs acknowledge this in their development plans and that they provide support in retaining social housing communities in the CAZ as well as affordable workspaces for shops and businesses that lower income households are dependent on.

The pressure in terms of property prices mean that buy to let and Airbnb is high on local authority estates – creating transience and sometimes divisions in neighbourhoods where there were once strong and stable predominantly working-class communities.

We propose that SD1K should be replaced with '**local residential neighbourhoods in the CAZ should be conserved – particularly those servicing the needs of low income households in terms of homes, jobs, shops services and amenities. Boroughs should support and protect these areas in full consultation with the existing local communities**.

User:	Living Streets

We support “H. The attractiveness of the CAZ to residents, visitors and businesses should be enhanced through public realm improvements and the reduction of traffic dominance, as part of the Healthy Streets Approach (see Policy T2 Healthy Streets)”.

User:	London Industrial and Logistics Sounding Board

Policy SD4 – The Central Activities Zone
We welcome part M of this policy that requires capacity for industrial and logistics to be identified and protected. However, this policy should go further to require boroughs and stakeholders to identify the scope for publicly and privately owned land to provide business space for last mile distribution/urban logistics, freight consolidation, storage, and other industrial and logistics uses. This may assist in addressing the issues around affordability of land.

User:	London Property Alliance

Central Activities Zone (‘CAZ’) – The role of the CAZ is vital in delivering a strong economy for London, which in turn will help to deliver “Good Growth” across the whole of London. The Alliance supports the continued definition of the CAZ. The draft Plan should strengthen its support for the CAZ and the critical functions that it delivers for London. Greater support of the CAZ’s retail, office and business uses in particular should be incorporated. Increased flexibility should also be provided for the CAZ in respect of affordable workspace, low cost B1 business space and retail and leisure uses.

User: London Property Alliance

The continued health and success of the Central Activities Zone ('CAZ') is essential if the wider objectives of the London Plan are to be achieved and the CAZ's contribution to the health of the UK's economy maintained.

It is therefore of vital importance that the draft London Plan's implications for the CAZ are fully considered.

We address specific policy areas in relation to residential and office development that are applicable both to the CAZ and elsewhere in separate sections of this response.
General Comments

The CAZ is the heart of London and contains much that defines London as a World City. In 2012 the CAZ generated an economic output of £139 billion, amounting to almost 10% of the UK's output2. It is clearly of national and international importance.

The continued success of the CAZ should be clearly and unambiguously supported by the London Plan. Its health and success is of vital and overarching importance to the future of London and the UK. Accordingly, we welcome the reference to "supporting and enhancing" the CAZ's office function in Policy SD4(B).

We suggest that an additional strategic policy relating to the CAZ is introduced to reflect this importance. This could split – and then strengthen – the support for the CAZ currently contained within SD4(A) and (B) from the other more detailed considerations relating to CAZ development set out in SD4(C)-(N).

It could also clearly state the particular importance of ensuring that all developments within the CAZ – given its exceptional accessibility – optimise density and make the best use of land, in the same way as is required of residential development by Policy D6. As currently drafted, the Alliance has concerns that the Plan does not contain sufficient safeguards to ensure local authorities do not set too conservatively low densities.

Policy SDx should therefore read:
"The CAZ is vital to the wellbeing of London as a whole. The continued growth and success of London's CAZ will be supported. Development that supports the growth of the CAZ should be encouraged, not restrained. All development proposals in the CAZ must make the most efficient use of land and be developed at the optimum density.
The unique international, national and London-wide roles of the CAZ, based on an agglomeration and rich mix of strategic functions as well as local uses, should be promoted and enhanced.

The nationally and internationally significant office functions of the CAZ should be supported and enhanced by all stakeholders, including the intensification and provision of sufficient space to meet demand. The City of London will continue to be promoted as the world's leading international financial and business centre. The West End, with its rich mix of retail, cultural and commercial uses, is a leading international visitor and business destination in its own right and will also continue to be promoted."

Spatial Definition and Key Diagram

We support the continued definition of the CAZ, particularly within the City of Westminster and the City of London. We recognise that other parts of London are also developing the rich mix of uses that has long characterised that CAZ and support the expansion of CAZ in principle.

Figure 2.16 in the draft Plan sets out a replacement CAZ diagram.

The identification of the West End within the CAZ diagram is welcomed and more detailed comments are set out within the West End section, below.

The definition of the Victoria Opportunity Area should be extended along Victoria Street to include those sites on the street that have not yet come forward for development and to align with the up-to-date definition with the City of Westminster's Local Plan.

The identification of the City of London, along its administrative boundaries, within the CAZ diagram is also welcomed. In view of the importance of the City of London to the health of the UK economy, we suggest that the Plan should recognise and explicitly support the City's role as a World Financial and Business Centre. This could be introduced into Policy SD5 and/or Paragraph 2.5.3.

Paragraph 2.4.12, relating to the specialist clusters of activity, should be amended to be clear that all these activities collectively contribute to the mix of uses that are of importance to the CAZ overall. Additionally, it should be recognised that the identification of these clusters does not prevent other uses otherwise appropriate within the CAZ from being brought forward within them.

Greater promotion should be given to the Thames 'North Bank' and the opportunities for redevelopment along the Northern Riverside.

User: London Property Alliance

We support the introduction, at Policy SD4(E), of policy to support “the unique concentration and diversity of cultural, arts, entertainment, night-time economy and tourism functions” as part of the CAZ.

We support the broadened definition of the International Centres to include Oxford Street, Regent Street and Bond Street as well as a wider West End Retail and Leisure Policy Area (‘WERLPA’) at paragraph 2.4.10(a), subject to ensuring breadth of appropriate uses are encouraged across the Centres (see below). The WERLPA is noted as including Covent Garden and Soho and we anticipate would be designated geographically at a local level. Recognising the potential role of the streets ‘one block back’ from the traditional retail streets of Oxford Street, Regent Street and Bond Street will contribute to creating a modern and integrated retailing district and the Alliance considers this should also be acceptable in policy. We suggest that the WERLPA is referred to specifically within SD4(F) to recognise its particular importance:

“The vitality and viability of the international shopping and leisure destinations of the West End, comprising both Oxford Street, Regent Street and Bond Street and the wider West End Retail and Leisure Special Policy Area, and Knightsbridge together with other CAZ retail clusters should be supported.”

We support and welcome the recognition of the leisure role, alongside the shopping role, of the West End and Knightsbridge, within Policy SD4(F). However, the importance of experiential retail, leisure and cultural activities as part of the attraction of retail destinations, including the International Centres, must be set out more clearly in the Plan. Leisure and culture must be recognised as an essential part of a vibrant, 21st Century international retail offer, rather than distinct from it. This is particularly important in view of the broader definition of the International Centres including the WERLPA now proposed. These other leisure and cultural uses are increasingly important contributors to 'vitality and viability' of retail areas, improving dwell times and generating activity in the evening (particularly in the face of online retail competition). This should be acknowledged. We therefore suggest SD4(F) is amended to read:

"The vitality and viability of the West End and Knightsbridge, both as international destinations for a diverse mix of shopping, leisure, cultural and entertainment uses, along with other CAZ retail clusters, should be supported."

In this vein, we welcome the recognition of the importance of the night-time economy within draft Policy SD4(E).

Strategic policy should ensure that leisure uses, mixed uses, and other innovative new uses that may not sit comfortably within established town planning Use Classes are supported within the West End including within the widened International Centres. For the International Centres to continue to succeed, they must offer both world class retail and a first class visitor experience that improves upon that available both in London's other shopping centres and in other leading world retail destinations. This environment, and, vitally, other supporting uses such as entertainment and leisure that
can provide amenities to shoppers to provide a diverse leisure offer alongside retail.

This should also allow flexibility for the International Centres, and the West End more widely, to be at the cutting edge of accommodating innovative new uses, start-ups and entrepreneurs who wish to challenge conventional assumptions about the categorisation of uses, rather than continuing to rely on Class A1 retail mono-culture in the face of rapidly changing retail patterns.

This is a key strategic issue that the London Plan should address.

User: London Property Alliance

The West End

Extensive work has been undertaken by Westminster Property Association ('WPA') and its Members, with the Business Improvement Districts and other stakeholders, to explore the potential of the West End and ensure that this area's unique character continues to be actively promoted and encouraged. This has led to the formation of the West End Partnership ('WEP') which includes the Mayor of London. WEP has agreed a long term vision for the West End.6

The Alliance is surprised that the importance of the West End is not recognised more clearly within the draft Plan. Whilst specific policies are devoted to matters such as hot food takeaway and the use of land for growing food, very little is said about the West End, which is of significant strategic importance to the economic health and cultural identity of London as a global city. We urge that this is addressed in the Plan.

It is vital that the definition of the West End properly reflects the wide diversity of uses found within it. The West End is described by the key diagram as a collection of 'Arts, culture and entertainment' uses. This ignores the other key aspects of the West End:

1. An office location. The West End accommodates 120,000 businesses and over 650,000 employees in a business environment of unparalleled diversity and creativity. It produced £51bn of GVA in 20147.
2. A retail location. The West End contains one of London's two International Centres, attracting national and international visitors as well as supporting the area's resident and working population. It also contains clusters of specialist retail uses.
3. A tourist destination. It accommodates many of London's key tourist attractions, including Buckingham Palace, the Houses of Parliament, Covent Garden and "Theatreland".
4. A centre for education. The West End is home to a number of world leading institutions.

It is essential that the definition of the West End is not based solely upon its role in arts, culture and entertainment.

We suggest that, rather than being defined as a Specialist Cluster alongside other, more specialist, areas, the West End is identified in a similar way to the City of London, along with a paragraph of explanatory text to SD4 that:

a) Recognises the particular importance of the West End to the economic, social and cultural identity and well-being of London; and
b) Acknowledges the range and diversity of uses within it, including those uses listed above as well as arts, culture and entertainment.

In addition, the location of the West End cluster identified in the CAZ diagram should be amended so that it relates to the definition adopted by the West End Partnership, which includes Whitehall, Marylebone and East Marylebone/Fitzrovia (between Oxford Street and Marylebone Road). This would, firstly, ensure that the definition of the West End is consistent with that adopted by the range of stakeholders, including WPA, that are seeking to support the area's growth and development through the WEP. This would also address a secondary concern that the cluster as currently shown only extends one block to the north beyond Oxford Street and excludes areas of Westminster that have a very significant mixed use character (as recognised by, for example, Westminster City Council's definition of 'Core CAZ' in the City of Westminster Local Plan).

This is particularly important when the significant resources being allocated to changing patterns of movement along Oxford Street are considered. For the Oxford Street Project to be successful, transport and public realm improvements must act as a catalyst to the development of the Oxford Street District, including the area to the north of Oxford Street, which should be clearly located and defined as part of the West End.

To support the growth of the West End and to sustain its dynamic and wide range of different uses, the draft London Plan should clearly direct that any local policies that would require residential as part of wider commercial developments should not be applied to non-office uses that add to the character and distinctiveness of the area. These should include the retail, entertainment, institutional and hotel uses that are vital to the identity, character and continued success of the West End. This would ensure that any local requirements to provide housing within the CAZ do not prevent other important uses from being delivered and would potentially reduce the cumulative impact of planning obligations. This would be entirely consistent with the approach adopted in Policy SD5, which seeks to ensure that residential development does not compromise the strategic functions of the CAZ by prioritising other CAZ uses. We suggest that Policy SD5 is amended accordingly.

User: London Property Alliance

Oxford Street District

The transformation of Oxford Street is a key objective for the West End. The physical transformation of the street itself has the potential to unlock significant additional growth in the area around the Street, which we refer to as the Oxford Street District.

The Oxford Street District is in the heart of the West End. It plays a key role in London's international retail offer as well as being the home to 2.2m sq m employment floorspace contributing £7.78bn to UK GVA8. The plans for Oxford
Street West envisage a public sector investment of c. £70m, by TfL and Westminster City Council. In view of the strategic role and importance of the District to London, it is right that proposals for the District should be addressed within strategic policy. This should go beyond a descriptive mention of the proposals as an example of proposals to enhance the environment and heritage of the CAZ, as currently set out at paragraph 2.4.7. The importance of the street in the context of the wider West End and Crossrail stations – Bond Street and Tottenham Court Road – should also be acknowledged in the Plan.

Policy SD4 should be amended to include:

a) Support for the proposed physical transformation of the Street itself; and
b) Clear, directive policy support for a greater intensity of development within the

District to capitalise on this physical transformation. This should encompass supporting a wider range of uses, greater use through a wider proportion of the day and evening and a greater scale and density of physical development.

User: London Property Alliance

Special Policy Areas

Part G of draft Policy SD4 rolls forward the previous London Plan's support for specialised CAZ uses and clusters such as health, law, education and state uses, as well as Special Policy Areas ('SPAs') of more localised clusters such as St James's and Savile Row.

The wording of Part G, regarding SPAs, is ambiguous and could be interpreted as encouraging the creation of "more" SPAs. Although the explanatory text is clear that they should be defined only in exceptional circumstances, the text of draft Policy SD4(G) should be clarified. We suggest the following revision to address this:

"The CAZ as a centre of excellence and specialist clusters (including functions of state, health, law, education, creative and cultural activities as well as localised
Special Policy Areas) should be supported and promoted."

Conclusion

We support the continued definition of the CAZ. The continued success of the CAZ should be clearly and unambiguously supported by the new London Plan. We suggest that an additional strategic policy relating to the CAZ is introduced to draft Policy SD4 to reflect this importance. The CAZ's mixed use character should be retained and supported. The vitality and viability of the West End and Knightsbridge is vitally important and policy must allow their retail function to adapt to rapidly changing retail patterns. The West End cluster should be amended to reflect the definition adopted by the WEP. The definition of the West End should also be widened so that it is not basedsolely upon its role in arts, culture and entertainment. The Plan should more actively
support the proposed physical transformation of Oxford Street.

User:	London Property Alliance

The Alliance welcomes the recognition within Policy SD4(B) of the importance of “supporting and enhancing” the nationally and internationally important office functions of the CAZ.

We have proposed further emphasis to this element of CAZ policy (see paragraph 4.8, above). We note that the City of London is specifically identified as a cluster within the CAZ diagram and we propose that policy specifically refers to promoting the City of London’s role as the world’s leading international financial and business centre.

User: HB Reavis UK Limited

HB Reavis supports policy SD4 which recognises that the nationally and internationally significant office functions of the CAZ should be supported and enhanced by all stakeholders, including the intensification and provision of sufficient space to meet demand for a range of types and sizes of occupier and rental values.

We also support Part H which states that the attractiveness of the CAZ should be enhanced through public realm improvements and the reduction of traffic dominance, and Part I which states that infrastructure to sustain and enhance the CAZ and its agglomeration of strategic functions including its public transport and digital connectivity and its potential to accommodation new development should be secured.

User:	University College London

Policy SD4 The Central Activities Zone (CAZ)

UCL fully supports this policy and its recognition of the importance of the educational sector and HEIs in the CAZ.

User:	Elephant & Castle Properties Co Limited

Policy SD4 – The Central Activities Zone (CAZ). We support the overarching objectives of this policy, however in respect of SD4(B) it should be made clear that the CAZ's office function forms part of the overall land use balance, and flexibility should be applied to enhancement and intensification, drawing on market signals and demand. The CAZ should maintain an appropriate balance of uses without compromising wider vitality or viability, therefore in some instances land use shifts are appropriate, as is the case at Elephant & Castle. Similar comments apply to SD4(C) insofar as sustaining and enhancing of distinct environment and heritage should be applied flexibly, with regard to other objectives and priorities of the plan.

User: Exhibition Road Cultural Group

Strategic Functions within the Central Activities Zone - Policy SD4

London's cultural, creative and education sectors are central to the city's economic and cultural well-being and as world-renowned centres of excellence, the institutions in this cultural quarter play an extremely important part in London's status as a leading world city. We welcome inclusion in Central Activities Zone of the cultural and educational organisations around Exhibition Road, reflecting the international, national and London-wide role of these institutions. We welcome the measures in **Policy SD4** to support and promote the CAZ as a centre of excellence and specialist clusters in education, creative and cultural activities.

We agree that the attractiveness of the CAZ to residents, visitors and businesses should be enhanced through public realm improvements and the reduction of traffic dominance, as part of the Healthy Streets Approach (Policy T2 Healthy Streets). We welcome policy support to secure infrastructure to sustain and enhance the CAZ and its agglomeration of strategic functions including its public transport and digital connectivity and its potential to accommodate new development. We also strongly welcome measures to ensure the safety, security and resilience of the CAZ, whilst ensuring Central London remains an open, accessible and attractive place to visit, study, work and live.

We particularly welcome the identification of the Royal Albert Hall/ South Kensington Museums area as a specialist cluster within the CAZ. This cultural quarter includes major cultural attractions, which have an important learning role, as well as being a centre of excellence for higher education and research in science, technology, design and arts. These functions are of regional, national and international importance and need to be supported and protected.

This area was designated as a Strategic Cultural Area under the previous plan and understand that the new name does not mean to diminish the protection and support given to this cluster in the new London Plan. The previous London Plan gave explicit support in Policy 2.11 to public realm improvement and events in the public realm in Strategic Cultural Areas. Whilst similar policies can be inferred within the new London Plan, particularly in **Policy T2 Healthy Streets** and **Policy HC5**, it would be good to see this more explicitly addressed in relation to major cultural attraction clusters. The public realm in Exhibition Road has been greatly improved but there is still potential to make significant improvements to make this a more attractive, safe and accessible environment. We ask you reinstate the commitment in previous policy 2.11 that the "The Mayor will, and boroughs and other relevant agencies should: extend the offer and enhance the environment of strategic cultural areas around the Kensington Museum complex. It is disappointing that this has not been included in the new London Plan.

User:	Historic Royal Palaces

The CAZ includes the Tower of London within its eastern boundary and all *or* part of the three local planning authority areas surrounding t he W HS. W e therefore support the references in Part C of the policy to sustaining and enhancing the distinctive environment and heritage of the CAZ; and the recognition in paragraph 2.4.7 of its strategic elements, including the River Thames, WHS and designated views. Given the range and diversity of organisations responsible for these important elements of the capital's heritage, however, we would hope that the Mayor could provide stronger policy guidance and leadership to ensure appropriate protect ion *for* the strategic value of these exceptional assets for the future.

User:	Imperial College London

although not within the Central Activities Zone, Imperial College London supports the reference to White City when referring to the centres of medical excellence and life sciences research, as White City will be equally important, if not more so, than the other areas mentioned. Promoting and sustaining these centres within London should not be limited to the Central Activities Zone. What is important is that support is given to them all, as each has a distinct role to play and it is their location within London that matters, rather than where within the capital that they are located. Otherwise, we would question how this fits with the principles of Policy GC5A to “promote the strength and potential of the wider city region”.

User:	Footwork Architects Limited

- Insert a paragraph after SD4 2.4.7, to describe how the social heritage and assets of the CAZ can preserve a sense of character and identity

User:	Landscape Institute London

I London is pleased to see recognition of London’s unique qualities in this section, in particular at 2.4.7, which refers to the importance of sustaining and enhancing London’s environment and concentrated heritage assets, including the River Thames, World Heritage Sites, and Designated Views as well as smaller waterways and green and open spaces. We are not sure whether the public realm should be referred to as a ‘more local feature’, however.

User:	Middlesex University

The focus on the economic significance of the CAZ neglects the potential for innovation and growth in the city's outer boroughs. Universities can act as leaders of growth and poles of innovation beyond the centre of the city, and we think that innovation is best thought of as a characteristic of sustainable places than as a regional resource sitting in one place. Like the majority of London's higher education institutions, Middlesex is not a research intensive university but it does have the capacity and capability to play the role of 'local innovation champion'. Our own researchers have asked, in compelling research over the years, whether a 'more holistic and ecosystem approach that includes investment readiness' and public sector stimulation isn't necessary for innovative SME growth6. Universities may be able to provide innovation support and stimulus outside of the CAZ. The University hopes that the Mayor will want to work with universities like Middlesex to unlock this potential so that no borough is without the support to create innovative enterprise in the context of good growth.

User: Natural England

We note that the target for a 5% increase in green cover in the CAZ within the current London Plan (2016) has been lost. We **recommend** that a similar aspiration is carried through to this plan.

The central London Business Improvement Districts have led by example, undertaking green infrastructure audits and subsequently delivering identified GI interventions benefitting people, the environment and the local economy. The GI delivery addresses local priorities such as surface water flooding, air quality, health and well-being, providing habitat using features like rain gardens, retrofitting living roofs and green walls, and greening healthier walking routes. These interventions have demonstrated that an increase in green cover is eminently achievable even within exceedingly high density environments within the CAZ. We **recommend** that these initiatives are encouraged through additional supporting text within this policy.

User: London Chamber of Commerce and Industry

Policy SD4 The Central Activity Zone (CAZ)

40. The Central Activities Zone (CAZ) and Tech City have been exempted from PDRs until May 2019, meaning that any conversion of office space to residential in these areas requires full planning permission. To ensure that office space in the capital is preserved, LCCI believes the CAZ and Tech City should be permanently exempted from PDRs.

41. PDRs can be a useful tool to increase housing supply but LCCI recognises that London has been particularly impacted by their use, due to the differential between office and residential values.

User: DPDgroup UK Ltd

Policy SD4 – The Central Activities Zone (CAZ)

The thriving centre of London is undoubtedly of vital importance to the UK and London with a wide and diverse range of businesses and building types in a dense area. The business and residents of this area however require servicing by companies from within the CEP who supply both business to business (B to B) and business to consumer (B to C) deliveries. B to C deliveries now represent 60% of the DPD operation, this percentage share is increasing year on year. It is vital that CEP sector operations are considered during design of both buildings and infrastructure to allow effective servicing of these locations with alternative fuel environmentally cleaner vehicles.

User:	Sustrans

SD4 D

We welcome air quality positive approach, however, note that this must be minimum requirement for the Central Activities Zone (CAZ)
And welcome supporting paragraph 2.4.8

“practical measures should be taken to improve air quality, using an air quality positive approach ~~where possible~~”

SD4 H

Strongly support the role of Healthy Streets Approach in enhancing the attractiveness of the CAZ

User:	Hornsey & Wood Green Labour Party

The Central Activities Zone has a unique role in providing many jobs for residents of Inner and Outer London with its concentration of arts, cultural and entertainment industries and its specialist clusters relating to government, law, health, education and other functions. We support steps to support its viability and to improve the often poor quality of its air.

User: Mr Gary Hayes

Policy SD4 The Central Activity Zone CAZ While policy SD4 says this area should be promoted and enhanced as an international, national and London-wide role in terms for its culture, arts and entertainment, the area is also home to many social housing estates and is an example of the worst aspects of polarisation - extreme wealth and poverty sitting cheek by jowl. It is a place where there are streets of expensive restaurants, where in some, a starter might cost as much as elderly residents on local council estates have to spend on food in a week.

In some parts of the CAZ where there has traditionally been a large number of supporting voluntary sector organisations (such as in Kings Cross). However, evidence shows organisations such as this have, or are been forced relocate as they are no longer able to meet local costs, reducing support for local communities.

The needs of many less well-off members of society living in the CAZ (and whose families may have lived there for generations) find other problems relating to living adjacent to luxury apartments – including loss of access to affordable sports, leisure, play and youth facilities, shops, services and other amenities that met their local needs.

Policy SD4 should acknowledge this. It should also require that boroughs acknowledge this in their development plans and that they provide support in retaining social housing communities in the CAZ as well as affordable workspaces for shops and businesses that lower income households are dependent on.

The pressure in terms of property prices mean that buy to let and Airbnb is high on local authority estates – creating transience and sometimes divisions in neighbourhoods where there were once strong and stable predominantly working-class communities.

We propose that SD1K should be replaced with ‘local residential neighbourhoods in the CAZ should be conserved – particularly those servicing the needs of low income households in terms of homes, jobs, shops services and amenities. Boroughs should support and protect these areas in full consultation with the existing local communities.

Policies SD6, Town Centres, SD7 Town Centre Network, SD8 Town Centres, development principles and DPDs , SD9 Town Centre Partnerships and implementation We have concerns about such a large amount of policy being focus on Town Centres, especially when increasing amounts of shopping is being done online.

Our concerns are the predominance of global stores and cafes; the viability of so many town centres being in close proximity to others, loss of local character and loss of shops, services, local markets and amenities that meet local needs and which are more likely provide employment to local people.

User:	Landsec

The Central Activities Zone is the heart of London and contains much that defines London as a World City. It is of national and international importance and its continued success should therefore be clearly and unambiguously supported by the London Plan. Accordingly, we welcome the reference to “supporting and enhancing” the CAZ’s office function in Policy SD4(B).

User: Landsec

We suggest that an additional strategic policy relating to the CAZ is introduced to reflect this importance. This could split – and then strengthen – the support for the CAZ currently contained within SD4(A) and (B) from the other more detailed considerations relating to CAZ development set out in SD4(C)-(N).

This additional policy, before SD4 should read:

"The CAZ is vital to the wellbeing of London as a whole. The continued growth and success of London's Central Activities Zone will be supported. Development that supports the growth of the CAZ should be encouraged, not restrained.
The unique international, national and London-wide roles of the CAZ, based on an agglomeration and rich mix of strategic functions as well as local uses, should be promoted and enhanced.
The nationally and internationally significant office functions of the CAZ should be supported and enhanced by all stakeholders, including the intensification and provision of sufficient space to meet demand. The City of London will continue to be promoted as the world's leading international financial and business centre."

User:	Landsec
Figure 2.16 sets out a replacement CAZ Diagram. This marks a significant change to the equivalent diagram within the existing Plan. The definition of the Victoria Opportunity Area should be extended along Victoria Street to include those sites on the street that have not yet come forward for development and to align with the up-to-date definition in the City of Westminster’s Local Plan.	

User: Landsec

It is important that the definition of the West End properly reflect the wide diversity of uses found within it. The West End is described by the key diagram as a collection of ‘Arts, culture and entertainment’ uses. This ignores the other key aspects of the West End:

- An office location. The West End accommodates 120,000 business and over 650,000 employees in a business environment of unparalleled diversity and creativity. It produced £51bn of GVA in 2014 (greater than the City of London).
- A retail location. The West End contains one of London’s two International Centres, attracting national and international visitors as well as supporting the area’s resident and working population. It also contains clusters of specialist retail uses.
- A tourist and leisure destination. It accommodates many of London’s key tourist attractions, including Buckingham Palace, the Houses of Parliament, Covent Garden and Theatreland.
- A centre for education. The West End is home to a number of world leading institutions.

We agree therefore with the Alliance’s suggestion that, rather than being defined as a Specialist Cluster alongside other more specialist areas; the West End be identified in a similar way to the City of London, with a section of explanatory text that explains the range and diversity of uses within it, including those uses listed above as well as arts, culture and entertainment. It is essential that the definition of the West End is not based solely upon its role in arts, culture and entertainment.

User:	Landsec
We also support the removal of mixed use policy at a strategic level.	

User: Redrow Homes London Division.

Part K of this policy states that ‘The attractions of predominantly residential neighbourhoods, where more local uses predominate, should be conserved’. Paragraph 2.4.17 states ‘The quality and character of the CAZ’s predominantly residential neighbourhoods should be conserved and enhanced.’ ‘Conserve’ is not the appropriate word to use in this context. Its meaning in planning terms relates to heritage assets and not to land use or sense of place more generally.

Part K of this policy and the supporting text should be redrafted.

From a strategic perspective it is crucial that within the CAZ strategic policy objectives including the economic, social and environmental case for the optimisation of land for all uses (residential and non-residential) is given appropriate weight when this is to be balanced against the ‘quality and character’ of residential neighbourhoods. The term ‘character’ must also be explicitly defined in this context.

User:	DB Cargo UK Ltd

DB Cargo supports the recognition in this policy that sufficient capacity for industry and logistics should be identified and protected, including last mile distribution, freight consolidation, processing and other related service functions within or close to the CAZ and Northern Isle of Dogs to support the needs of businesses and activities within these areas.

DB Cargo consider that it should be made clear that consolidation centres should be rail served wherever possible.

User: Andrea Carey Fuller

While policy SD4 says this area should be promoted and enhanced as an international, national and London-wide role in terms for its culture, arts and entertainment, the area is also home to many social housing estates and is an example of the worst aspects of polarisation - extreme wealth and poverty sitting cheek by jowl. It is a place where there are streets of expensive restaurants, where in some, a starter might cost as much as elderly residents on local council estates have to spend on food in a week.

In some parts of the CAZ where there has traditionally been a large number of supporting voluntary sector organisations (such as in Kings Cross). However, evidence shows organisations such as this have, or are been forced relocate as they are no longer able to meet local costs, reducing support for local communities.

The needs of many less well-off members of society living in the CAZ (and whose families may have lived there for generations) find other problems relating to living adjacent to luxury apartments – including loss of access to affordable sports, leisure, play and youth facilities, shops, services and other amenities that met their local needs.

Policy SD4 should acknowledge this. It should also require that boroughs acknowledge this in their development plans and that they provide support in retaining social housing communities in the CAZ as well as affordable workspaces for shops and businesses that lower income households are dependent on.

The pressure in terms of property prices mean that buy to let and Airbnb is high on local authority estates – creating transience and sometimes divisions in neighbourhoods where there were once strong and stable predominantly working-class communities.

We propose that SD1K should be replaced with '**local residential neighbourhoods in the CAZ should be conserved – particularly those servicing the needs of low income households in terms of homes, jobs, shops services and amenities. Boroughs should support and protect these areas in full consultation with the existing local communities**.

User: Lendlease

Whilst the long-term ambition for the Elephant and Castle Opportunity Area to be included within the CAZ (Figure 2.16) is welcomed, Lendlease considers Elephant and Castle's inclusion in the CAZ at this point to be premature. The vision for the Elephant and Castle Opportunity Area is set out in the Elephant and Castle SPD (2012) which seeks to create an enhanced and vibrant central London destination. The SPD sets strategic delivery targets of 45,000 sqm of new shopping and leisure floorspace; 25,000-30,000 sqm of business floorspace. Non-residential uses are therefore critical in achieving this vision to help deliver the target of enhanced London Plan target of 10,000 new jobs in the area and to create the new employment growth corridor to link with the Old Kent Road Opportunity Area.

Lendlease is concerned that the inclusion of Elephant and Castle in the CAZ at this time will undermine realisation of the strategic vision by harming the viability of non-residential development and fettering the delivery of significant commercial and retail schemes in the area and place jobs, growth and vitality needed for the emerging town centre at risk. This is contrary to adopted and emerging local and regional guidance which seeks to re-establish Elephant and Castle as a vibrant Major Town Centre following decades of decline.

A key component of Lendlease's Elephant Park masterplan is the delivery of affordable retail and small business floorspace. These uses by their very nature are delivered on the fringes of viability and delivered at a commercial loss for the benefit of the area. The associated burden of CAZ inclusion will have the effect of limiting such delivery to the detriment of existing traders and small, independent operators. Elephant and Castle may be more appropriately designated as a CAZ reserve location, through part N (3) of the proposed policy, to be included once the regeneration aims are achieved.

Lendlease considers that a wider review of the CAZ would be worthwhile to reflect the eastwards shift of the City and the significantly increased housing targets.

User:	UKWA
This policy should require boroughs and stakeholders to identify and provide space for warehousing/consolidation/urban logistics space to enable last mile deliveries.	

User: Cross River Partnership

The strong support in the Plan for the distinct nature of the Central Activities Zone (CAZ) is certainly welcome. The importance of this Zone for the overall prosperity and well-being of the whole of London should not be underestimated. All the facets of the Zone described accurately and fully in the Plan highlight this.

Policy SD4 CAZ, industry and logistics space within or close to the CAZ. This is already difficult. Creative solutions are required to ensure that the necessary space is provided, and that more sustainable logistics functions are facilitated within the CAZ e.g. smaller spaces for micro consolidation can support new developments, off-street loading and unloading bays should be required.

Policy SD4 CAZ. More F Retail clusters, in addition to the West End and Knightsbridge already mentioned, more should be included e.g. South Bank, The City, The Strand, Victoria etc to ensure appropriate development and protection.

User: London Borough of Camden

The Council welcomes the recognition in Policy SD4 and supporting paragraphs that there are residential communities and locally orientated uses in the CAZ, but believes the Plan should recognise more fully that the communities in the CAZ and the facilities that serve them often form part of the mix of uses within specialist clusters, and are not located in discrete residential neighbourhoods.

Three of the LB Camden's wards fall entirely within the CAZ, these are Bloomsbury, Holborn and Covent Garden and King's Cross. At the 2011 Census, these wards had 35,758 usual residents (16.2% of the Borough total) and 30,897 household residents (14.5% of the Borough total), but occupied only 283 hectares, or 3.6% of the Borough's total area. These wards also contained 14.4% of the Borough's residents in employment. These residential communities therefore represent an enduring and important part of the character of Central London and a significant part of its workforce.

Many residents live in existing communities in Fitzrovia and Bloomsbury, co-located with UCL, the University of London and University College Hospital. More residents form part of a community in Covent Garden, co-located with some of the arts, culture, entertainment and retail functions of the West End. In addition, new and expanding communities are emerging at the designated Opportunity Areas at the edge of the CAZ at King's Cross Central (1,900 homes are planned of which around half have been delivered) and Euston (2,800 to 3,800 homes are planned). While the Council supports the strategic functions of the CAZ, the Council believes that Policy SD4 should also seek to meet the needs of existing and new CAZ residents and respect their quality of life.

User: London Borough of Camden

The Council supports the revised boundary of Euston Opportunity Area, as this now better reflects the boundary for LBC’s future Euston Station Area Planning Brief.

As policy SD4 correctly states, it is for borough development plans to define the detailed boundary of the CAZ. We appreciate that the diagram has been redrawn for clarity; however, this has had the effect of giving it an inappropriate level of accuracy which means it could be used to identify designations on particular pieces of land. The version in the final version of the Plan should be more diagrammatic, with detail properly left for borough plans and Policies Maps.

We note that the Opportunity Area at King's Cross is simply titled King's Cross OA in Figure 2.11 but as 'King's Cross – St Pancreas' (sic) in Figure 2.16. For consistency with the Camden Local Plan 2017 and Figure 2.11, the Council proposes that the term "King's Cross" should be used throughout the London Plan.

User: WeAreWaterloo Business Improvement District

In addition to being an Opportunity Area, the Waterloo BID Area is within the Draft New London Plan's Central Activities Zone (CAZ). The CAZ is recognised as being London's vibrant centre and one of the world's most attractive and competitive business locations.

We Are Waterloo supports Policy SD4 – Central Activities Zone, of the Draft New London Plan, and in particular, the acknowledgement of the significance of existing office uses, the preservation of environmental and heritage values, and the promotion and enhancement of cultural, arts, entertainment and night-time economy activities within the CAZ. All of these matters are important to successful operation of the We Are Waterloo BID Area, and it is positive to see that the Draft New London Plan recognises, promotes and seeks to preserve them.

We Are Waterloo would like to voice concerns about how the Draft New London Plan considers Town Centres within the CAZ. In particular it is considered that there is a failure to recognise Town Centres within the CAZ, as illustrated by Figure 2.17 – Town Centre Network, which supports Policy SD7, apart from the two 'international centres'. We further note that the Draft New London Plan could provide more detailed guidance for the development of Town Centres, beyond the focus on retail frontages.

User: WeAreWaterloo Business Improvement District

In addition to being an Opportunity Area, the Waterloo BID Area is within the Draft New London Plan's Central Activities Zone (CAZ). The CAZ is recognised as being London's vibrant centre and one of the world's most attractive and competitive business locations.

We Are Waterloo supports Policy SD4 – Central Activities Zone, of the Draft New London Plan, and in particular, the acknowledgement of the significance of existing office uses, the preservation of environmental and heritage values, and the promotion and enhancement of cultural, arts, entertainment and night-time economy activities within the CAZ. All of these matters are important to successful operation of the We Are Waterloo BID Area, and it is positive to see that the Draft New London Plan recognises, promotes and seeks to preserve them.

We Are Waterloo would like to voice concerns about how the Draft New London Plan considers Town Centres within the CAZ. In particular it is considered that there is a failure to recognise Town Centres within the CAZ, as illustrated by Figure 2.17 – Town Centre Network, which supports Policy SD7, apart from the two 'international centres'. We further note that the Draft New London Plan could provide more detailed guidance for the development of Town Centres, beyond the focus on retail frontages.

User:	Local London Partnership

Local London welcomes the proposal that Stratford (alongside Old Oak Common) is identified as a potential future reserve for CAZ-related office space. The Policy could say more about the implications of being Future Potential Reserve in Stratford in terms of which part of the CAZ policies apply, and what added value in terms of extra infrastructure investment etc., could be applied.

User: UK Power Networks

As part of our plans to increase capacity to meet the future demand for power in London when it is required, we are reinforcing the network in areas such as Osborn St; Limeburner Lane; Eltham; Finsbury Circus; Backhill, Fisher Street, Wimbledon, St Pancras, Wandsworth & Southbank along with supporting Crossrail and the development of Wood Wharf with new substations at the Limmo Penninsula and Blackwall Way. In central London, together with partners we are delivering four new substations, located where demand is expected to rise over the coming years. These new substations will be vital in providing an extra 300MVA of capacity (equivalent to nearly six Olympic Parks).

Details on these sites can be found below, with further information within our Central London Plan1.

Calshot Way (also known as Grafton Way)
Capacity: 86MVA **Complete**: May 2018 **Cost**: £10.4m
Grafton Way is a part of our City Road/City of London Regional Development Plan. The plan is to build a new substation in the Kings Cross area that will provide an increase in capacity of 86 MVA. This extra capacity will allow load to be transferred from the nearby Back Hill substation.

Vauxhall, Nine Elms, Battersea (also known as Stewart's Road)
Capacity: 86MVA **Complete**: 2019 **Cost**: £29.4m
We proposed the building of a new substation to facilitate the development of new planning proposals in the Vauxhall, Nine Elms and Battersea areas on the south bank of the Thames.
This substation will facilitate:
· 16,000 new homes;
· An extension to the London Underground Northern Line; and
· Regeneration of Battersea Power Station

White City (also known as Wood Lane)
Capacity: 43MVA **Complete**: 2020 **Cost**: £16.1m

The London Borough of Hammersmith and Fulham and the Greater London Authority have agreed a new White City Development, with mixed office, residential and community use. The site is close to the BBC Television Centre and Westfield shopping centre and a new substation in the White City area was proposed to support this new development.

West End
Capacity: 86MVA **Complete**: Mid 2020s **Cost**: £36.5m
London's West End is one of the most economically important areas of London. It encompasses the entertainment districts of Leicester Square and Covent Garden, as well as shopping districts on Oxford Street, Regent Street and Bond Street. Three substations that supply this area are expected to exceed their current capacity and hence we are developing plans to construct this new substation.

User:	Battersea Project Land Company Limited

Figure 2.16 – CAZ Diagram

We support the continued identification of Battersea Power Station as a Potential CAZ retail cluster, in recognition of the new town centre being built on the site.

User:	Age UK London - a charity working with older Londoners
SD4 Criterion F adding safety (see 8 above) Whilst safety is also mentioned in Criterion J entry here reinforces the intention for town centres.	

User:	Regeneration X

Policy SD4 The CAZ
A- 'The London for locals' is not stressed sufficiently. London working for Londoners must come first and not as an afterthought after the International and National role of London. It is the London for locals that is London's unique feature.
B – The same applies for the office function. The need for office space for local businesses must be addressed and delivered.
D – The dense nature of the CAZ is not uniform and must not be allowed to become so. London has low density next to and intermixed with high density. This must not be lost.
K – The attractions of predominately residential neighbourhoods, where more local uses predominate, must be conserved. This must equally apply to 'Council Estates' and not just private sector residential areas.
M – Says that capacity protection for 'last mile' distribution should be protected. But this is already being ignored. See the Old Kent Road Opportunity Area where firms which supply the CAZ are being forced out.

User:	Regeneration X

2.4.6 Talks about a wide range of business space requirements, and that quality and range of rental values is essential to enable these sectors to flourish and for SMEs to fulfill their economic potential. This will not happen if London is seen as an investment opportunity for international capital. Thought must be given to how SMEs can actually own their premises, or be community or co-owned, and not be reliant on institutional landlords.

User:	Regeneration X
2.4.8 We don't see the logic of imposing charges on the most polluting vehicles. Why should you be allowed to pollute of you can pay for the privilege. It something is bad just ban it.	

User:	Regeneration X

2.4.10 Night-time and cultural attractions must not only be focussed on tourists. Locals need access to these, as do those who can't afford high ticket, food and drink prices. There must be a wide range of offers – formal and informal; low cost and no cost. The Plan seems to ignore the problems which can arise if locals feel that tourism harms their quality of life (see what is happening in Barcelona where there is a backlash against mass tourism).
CAZ has over the years lost its family owned and run businesses, especially retail and food (cafes, small newsagents and grocery shops etc). These family run and owned businesses must not be allowed to become extinct. London (including in the CAZ) must be a London for SMEs and not just national and international chains.

User:	Regeneration X
2.4.17 Talks about diverse communities including affordable housing. Affordable Housing is now a misused and devalued term. Social Housing must be specifically mentioned and specified as a requirement to be delivered.	

User:	Regeneration X

2.4.18 *“in the high-value land market within the CAZ there is very limited industry and logistics capacity*”. This statement in the draft Plan totally ignores the point of, and the use of, the Town Planning System. It is land use which determines the value of the land – if a site is only allowed to be used for industrial use that use will determine the value of the site. The Planning System must be used to deliver what is required to benefit the community and society as a whole. We must not allow speculation and hope value to dictate how land in London is used or not used. It is not sufficient to talk about supply and demand of such uses. Demand can be choked-off by land owners asking high rental prices. We must consider the need of these land uses not the just the 'demand' (which can be choked-off). In the Old Kent Road existing logistics and industrial use is being forced out because the land owners want to force these businesses out and turn the sites into higher value residential use.

User: London national Park City Foundation

The Central Activities Zone (CAZ) - Policy SD4, Page 66 - 69

LNPCF supports the intention to:

2.4.7 The distinct environment and heritage of the CAZ should be sustained and enhanced through development decisions, Local Plans and other initiatives such as the transformation of Oxford Street. This should recognise both its strategic elements, including the River Thames, the Royal Parks, World Heritage Sites, Designated Views and unique concentration of heritage assets, as well as more local features including the public realm, smaller waterways and green and open spaces.

2.4.8 Air quality in the CAZ is particularly poor due to the intensity of the road network and land uses. The CAZ also experiences high levels of construction which results in dust and emissions from construction activities and equipment that adversely affect air quality. The Mayor is taking practical steps to improve air quality in the CAZ including the T-charge and stricter Ultra-Low Emission Zone which will impose charges on the most polluting vehicles.

User:	Canary Wharf Group

15.The role of the NIOD as part of the CAZ is to support London’s position as a global city.As set out in the CAZ SPG, the agglomeration benefits of the CAZ is based on a rich mixof strategic uses as well as local uses. This includes a wide range of uses beyond officeand commercial uses such as retail, cultural uses, tourism facilities, leisure andentertainment etc. Alongside these strategic CAZ uses there is a need for housing,social infrastructure and community uses to support residents, visitors and workers.These uses are also critical for placemaking and for attracting new businesses which isbecoming harder and more competitive nationally and internationally particular in a postBrexit environment. Prospective tenants have increasingly higher expectations in wherethey want to base themselves which is in part driven by the demands of existing andfuture employees. They want to be based in vibrant and animated areas with a clearsense of identity, where they can enjoy local attractions and have the opportunity to livenearby.

Policy SD5 Offices, other strategic functions and residential development in the CAZ

User:	Mr Peter Eversden MBE

It is not understood how or why offices and other CAZ strategic functions are given equal weight relative to new residential in predominantly residential neighbourhoods or wholly residential streets, as in SD5 D 3). It would imply possible replacement of housing with commercial uses which would cause problems in the support of local facilities. There may be opportunity for CAZ-type uses in areas where housing could be densified but that should be discussed at the examination of the New London Plan.

User:	Mrs Lynne Bailey

Whilst I agree with point A), is there really no opportunity for residential development in these areas? If you are increasing the number of employment opportunities here then it would be useful (and cut down on travel requirements) for some of the people who work there to be housed nearby.

User:	Levitt Bernstein

A. Agree
B. Not convinced by this as mixed use development can be very successful. We would need to see the plans.

User:	Levitt Bernstein
Agree.	

User:	London Forum of Amenity and Civic Societies

It is not understood how or why offices and other CAZ strategic functions are given equal weight relative to new residential in predominantly residential neighbourhoods or wholly residential streets, as in SD5 D 3). **It would imply possible replacement of housing with commercial uses** which would cause problems in the support of local facilities. There may be opportunity for CAZ-type uses in areas where housing could be densified but that should be discussed at the examination of the New London Plan.

User: London Assembly Green Party Group

These comments cover policies SD4 and SD5 and are submitted in both sections.

I welcome policies in SD4 and SD5 that seek to build a more sustainable economy and a healthier environment within the Central Activities Zone (CAZ), but do not think these go far enough.

I am happy that policy SD4 D asks for an “air quality positive approach where possible” within the CAZ. I also welcome SD4 M, which seeks to protect industry and logistics in the CAZ and promotes “last mile distribution.”

However, I believe the draft policies here suffer from a lack of a vision for the CAZ in the future to be predominantly traffic free. The Plan period ends in 2040 and it shows a serious lack of ambition not to have a clear strategic goal to reduce traffic dramatically in the CAZ by the end of the plan.

Policy SD4 doesn’t even include the Mayor’s mode shift goal seen in other relevant policies, or a goal to reduce traffic in real terms. This policy should be amended to include both these things, and the CAZ should have a near 100 per cent goal for mode shift away from cars, not just the overall 80 per cent goal that exists for London as a whole.

Policy SD5 seeks to discourage residential development and protect office space from permitted development rights, which will help to reverse some of the losses that have occurred in recent years. I am pleased with the strong support given to boroughs to develop Article 4 directions here.

User:	Diocese of Southwark

While encouraged by the equal weight given to new residential development in the Opportunity Areas of VNEB and Elephant & Castle, the Diocese of Southwark would encourage the Mayor to continue to give significant weight to residential development elsewhere, in particular, to affordable housing and social housing.

User:	Arcadis LLP

Spatial development has to address mixed land uses and we welcome the Draft Plan’s approach to employment generation.

User:	Trust for London

The Plan should allow a more balanced approach to housing in or near the CAZ, to allow more of those with low-paid jobs in the CAZ to live nearby. About 1 in 6 low-paid jobs in London are in the central area, at a job density four times that of the all-London average. Just under half of all low paid jobs in London are in Inner London. The higher cost of commuting (relative to earnings) for those doing low-paid work means that is in their interests to live as close to work as possible. Given the higher job densities in central and inner areas, maximising the number of low-cost rented homes (social rent/London Affordable rent) within or close to the CAZ is also an effective way of supporting the Mayor's goal for 80 per cent of trips to be walk, cycle, or public transport by 2041. While a balance must be struck between competing uses, we believe greater emphasis is needed in relation to affordable residential homes.

User: Publica

We welcome the prioritisation of commercial development in these key business areas, but suggest that this could be extended to cover specific areas of the West End. As London grows, the Central Activities Zone (CAZ) will be of critical importance. As part of our work developing a *Future for the Oxford Street District* (2017), in partnership with Gerald Eve and Volterra, we suggested that residential use should no longer be the priority use across the Oxford Street District and that commercial uses should be given priority in this area.

In this part of the CAZ, one of London's two international retail districts, there is a loss of vital commercial floorspace when it converts to residential use, and because it rarely reverts back to residential use, this represents a a permanent loss of floorspace.

While we recognise the decision by some boroughs including Westminster to use Article 4 directions to protect commercial floorspace in the CAZ, we would welcome the comittment to this at a higher, GLA level.

User: Home Builders Federation

Policy SD5: Offices, other strategic functions and residential development in the CAZ

We are also concerned that the impact of SD5, and in particular SD5.C4 will, in conjunction with Agent for Change proposals, discourage residential development continuing at current and recent rates. It is very unlikely that the Mayor will be able to double the rate of development that is now required by the London Plan. The Mayor's assessment of his ability to double housing completions is entirely theoretical and does not take into account the new obstacles to residential development that Policy SD5 introduces.

While we appreciate the Mayor's desire to protect employment land, we are unconvinced that this can be achieved without an adverse impact on housing supply and the delivery of the new targets. This is because some of the past trends in delivery that the SHLAA 2017 is based upon will have been on former industrial land. If the Mayor wishes to continue with the compact city concept – a concept that has guided all previous iterations of the London Plan – then he must be more realistic about the number of dwellings that can realistically be accommodated in London. Relying on the theoretical assumption that by increasing the density of development and by encouraging mixed-uses, one will be able to accommodate all housing needs is too risky as the basis for a sound plan. The London Plan needs to be underpinned by tangible land supply informed by a conversation with land owners and developers about what they think they can reasonably provide on sites in the light of all the London Plan policies.

In the light of this policy, the assumption that employment/industrial land in CAZ will still continue to yield homes is unfounded. The contribution from this source should be heavily discounted.

We note paragraph 2.123 of the 2017 SHLAA. This reduces the housing yield probability assumption to 5% for land within the CAZ. We consider that it would probably be safer to assume no housing supply from land in these categories. If housing does come forward it would be accounted for as part of the small sites/windfall allowance that we propose should be no greater than 13,000dpa.

User:	Royal Borough of Kensington and Chelsea

2.3 Policy SD5 Offices, other strategic functions and residential development in the CAZ

The Council welcomes the Draft London Plan’s explicit support for the use of Article 4 Directions in and around the CAZ, to ensure the safeguarding of nationally-significant concentrations of offices.

User: Get Living London

The effect of applying draft Policy SD4 would trigger the application of draft Policy SD5 ‘Offices, other strategic functions and residential development in the CAZ’.

GLL are concerned that the greater weight given to offices and other CAZ strategic functions relative to new residential development (draft Policy SD5 (C)) in CAZ satellite and reserve locations such as Stratford could have a negative effect on the development potential of the remaining sites within the LLDC area.

This is particularly the case should the policy be applied prematurely. Until such time that Stratford is established as an office destination, the application of such a policy could have a negative impact on the development potential of some sites particularly if the promotion of those sites as office destinations do not progress as hoped. There should be a mechanism to allow for flexibility where it can be demonstrated that an office development on the site is not forthcoming.

The GLA will also be aware that large parts of the area benefit from major planning permissions (e.g. Stratford City) that continue to be built out. The draft London Plan should therefore recognise the need for flexibility to allow current planning permissions to change as priorities and market conditions evolve.

It is crucial that any review of planning policies that relate to Stratford and immediate surroundings therefore provide maximum flexibility and recognise that changing circumstances may mean that a review of proposals could take place on sites which already benefit from planning permission but have not yet been delivered. It is important however that emerging Policy does not diminish or dilute principles which have already been established within existing planning permissions.

Specific Amendment Sought

GLL considers that the application of draft Policy SD5 to future potential reserve locations for CAZ office functions such as Stratford is unjustified and premature. The necessary amendments are dealt with in our representations to draft Policy SD4.

User: London Borough of Islington

Chapter

Spatial Development Patterns

Draft London Plan Policy

Policy SD5 – Offices, other strategic functions and residential development in the CAZ

Islington Response

As noted above, we believe office use should explicitly be prioritised as the highest priority CAZ strategic function. The Council notes that this policy builds upon Table 1.1 of the CAZ SPG. The wording of the policy is essentially lifted from the SPG however there is a potentially significant departure from the SPG in Part C of Policy SD5, which states where office is given greater weight over residential use. The policy does not state that 'all other parts of the CAZ' should be given greater weight than residential use, meaning that in Islington, the draft plan gives only offices in the City Fringe/Tech City OA greater weight than residential use. We note that this area is also one of the specific areas where the draft plan promotes hotel development, which opens up significant potential for conflict between strategic functions here (see response to policy E10 for further comment). There are numerous clusters of office uses in the Islington CAZ, including a significant cluster in Clerkenwell, which would therefore be unprotected.

Further clarification on whether this is the intention of the policy is needed, as if this is the case, it is potentially contradictory to the intent of Part H of the policy, which states that residential development should not lead to a net loss of office floorspace anywhere in the CAZ. We can envisage such conflict within the policy being used against us in planning applications. Fundamentally, it creates a potential policy weakness which could be exploited and could make it difficult for the Council sustain the primary economic function of the majority of Islington's CAZ. Islington's Employment Land Study (2016) clearly sets out the need for a significant amount of additional office floorspace over the plan period (circa 400,000 sqm) and this policy could potentially undermine the Council's ability to meet this demand and therefore secure economic growth. The council consider that there are two straightforward solutions to this issue; either reinstate the wording as per table 1.1 of the CAZ SPG; or (Islington's preferred wording) replace all of Part C sub criteria 1-5 as follows:

C. Offices and other CAZ strategic functions are to be given greater weight relative to new residential development all parts of CAZ except those stated in D below.

The City Fringe OAPF establishes a boundary for the City Fringe and identifies parts of Islington, Hackney and Tower Hamlets as ‘core growth areas’. These core growth areas are locations where there will need to be a continued supply of employment space. The OAPF further identifies inner core areas, outer core areas and hinterland areas. The inner core areas are where there is likely to be most demand for employment space and where development proposals should provide the maximum amount employment floorspace feasible, and there should be no net loss. The GLA is asked to consider identifying the inner core areas of the City Fringe in Part B of policy, which states that residential development is not appropriate in the City of London and the Northern Isle of Dogs.

Policy 4.3Bc of the 2016 London Plan seeks to protect small scale offices of under 500 sqm, where justified by local and strategic office demand. We note that this has been removed from the Draft London Plan. In Islington, there is strong demand within the CAZ (and elsewhere) for office floorspace which caters specifically for small occupiers. The Council welcomes clarification on why this has been removed and would support its reinstatement in the draft London Plan. We note that policy E2 does have some focus on protecting small offices but it does not equate to the protections in the current London Plan policy.

User:	Covent Garden Community Association

We are concerned that whilst residential development is given a lower priority than all other CAZ functions the strategic functions are given equal weight. We believe that within the CAZ and more locally within Covent Garden the conversion of offices to hotel has taken over from office to residential conversion as the biggest threat to the vitality of the area. We believe that it is appropriate that Councils have the option to priories some strategic uses in the CAZ above others in order to not erode the existing clusters of office uses.

User: Battersea Society Planning Comittee

Policy E7 Intensification, co-location and substitution of land for

industry, logistics and services to support London's economic

function ; Policy SD5 Offices, other strategic functions and residential

development in the CAZ

We welcome the objective in **Policy E5 for** retaining SILs. However we are concerned that Policy E7 which supports intensification through delivery of residential and other uses in SILs could severely affect the nature and level of employment in the Queenstown Road SIL where pressure from residential development is high. This is one of the few remaining areas for small and mixed businesses serving the opportunity area and the rest of CAZ. We therefore consider that **Policy SD5** needs to be applied sensitively in this area and we would hope that the employment capacity in Battersea is not reduced by substitution of business use for residential.

While we are not opposed to intensification of employment areas it must be set in a wider local context of proper internal road access, delivery and parking provision linked to external major routes and public transport

User: City of London Corporation

The City Corporation strongly supports the emphasis on the role of the City of London as an office centre of national and international importance. The statement that ‘residential development is not appropriate in the commercial core of the City of London’ is welcomed, together with the indication that outside of this core, other CAZ strategic functions (such as culture and entertainment) should be given greater weight relative to residential development. The policy provides a strong foundation and support for the long-standing approach in the City of London Local Plan which gives priority to office and commercial development within the City of London. The City Corporation also welcomes the continued support within the Plan for off-site contributions, land use swaps and credits in lieu of mixed-use development in the CAZ in order to sustain the strategically important cluster of commercial activity in the City.

The City Corporation welcomes the Mayor’s support for the introduction of Article 4 Directions within the CAZ to permanently remove office to residential permitted development rights. The City Corporation is introducing a non-immediate Article 4 Direction to come into effect on 31 May 2019.

Whilst welcoming the strong support for the City’s office role, the City Corporation will continue to identify and permit sufficient residential development to meet London Plan targets and contribute towards meeting London’s wider housing needs. The City Corporation will also continue to deliver additional housing, including affordable housing, through development on its own housing estates and through development on Corporation owned land elsewhere in London, and is demonstrated by the Corporation’s commitment to deliver 3,700 new homes by 2026.

User:	London Waste and Recycling Board (LWARB)

1. We would suggest that policy SD5I also include consideration of meanwhile office space use where appropriate.

User: London Borough of Lambeth

Lambeth notes the change of emphasis on the mix of land uses in the CAZ, with a greater emphasis on offices in Waterloo and equal weight for housing and CAZ strategic functions in VNEB. Lambeth supports this in principle for Waterloo but the wording should read “new residential development is welcome provided it does not compromise the strategic functions of the CAZ” rather than “should not compromise”. To make this work, an area-wide approach will be needed across each OA, rather than narrow application of the principle on a site-by-site basis. This further emphasises the need to establish clear monitoring parameters and timescales for the overall homes and jobs targets in each OA (see the point under SD1 above).

However, Lambeth considers that a different approach is needed for the Vauxhall part of the VNEB OA. For Vauxhall, development of offices and other CAZ strategic functions should be given greater weight over residential in future developments. This is because Lambeth has exceeded its requirements in meeting the 3,500 new homes target for VNEB, so would prefer greater weight be given to new job-generating floorspace to support the growth of the centre at Vauxhall.

User:	Waterloo Community Development Group

Policy SD5 C (4) and D should include Waterloo OA in the list of exceptions at C4, and be included in the list at D. Waterloo is a very strong residential area with much scope for enhancement of residential – for example, the development at the Shell Centre site is delivering 900 additional homes as well as employment capacity for 6,000 people.

User: British Land

Offices, other strategic functions and residential development in the CAZ (Policy SD5)

16. We welcome the additional support and the primacy given to office floorspace relative to residential floorspace in core commercial areas of the CAZ and most CAZ Opportunity Areas. The effect of mixed use policies, for example in the London Borough of Camden and City of Westminster, which require an equivalent level of residential floorspace to be provided alongside any uplift in commercial floorspace either within the building or elsewhere, can make redevelopment challenging when office buildings comes to the end of their operational life or when tenant / occupier leases expire and will reduce the supply of employment floorspace.

User: Canary Wharf Group

We seek a clarification on draft policy SD5. Part B makes reference to the detailedboundary of the commercial core of the City of London and NIOD being defined byboroughs in Development Plans. Part C is not however clear how “other corecommercial areas of the CAZ” are defined. It is our view that these would also be bestdefined by boroughs in Development Plans and that text be inserted to make this clear.There may for instance be circumstances where the ‘greater weight’ requirement forCAZ Opportunity Areas has a negative impact on the delivery of housing in certain partsof these areas. As such, there should be a mechanism, during Development Planpreparation (either through defining CAZ boundaries or specific Site Allocations) toexclude parts of Opportunity Areas from core commercial areas so that the ‘equalweight’ requirement applies.

We are also unclear with regard to part H of draft policy SD5. Part H sets out twoprovisions where the loss of office floorspace in the CAZ could be acceptable. However,currently these provisions are referred to as “and/or”, should they not just be an either“or”. Secondly, given that older office buildings can be very inefficient with large ancillaryspaces, the first part of part H should refer to “a loss of net office floorspace” [ourunderlining].

User:	London Borough of Hounslow
LB Hounslow supports this policy	

User:	West End Partnership

The Partnership welcomes recognition that it is appropriate for boroughs to set out local level approaches to mixed use policy. However, as drafted the level of detail in SD5 would harm the ability of boroughs to implement their own mixed use policies. Boroughs have particular land use priorities which are better met through a local plan. We therefore suggest that the Plan should explicitly delegate mixed use policy to the local borough level and excessive detail be removed.

User:	London Cycling Campaign

Add item J:

Office developments must meet or exceed the cycle parking standards in Plan table 10.2 and provide safe access to main cycle routes

User:	Soho Society

SD5C The first sentence of this policy should be amended to include the words “hotel and” after the word “new”. The increasing trend to locate hotels in Soho and elsewhere in the inner West End is starting to erode established office uses and clusters of SME creative industry uses at least as much if not more than new residential uses.

User: London Borough of Tower Hamlets

This policy aligns with our approach and is broadly supported. Part D of the policy should make it clear that this is referring to other parts of the City Fringe which are not part of the commercial core areas.

Furthermore, it is not clear how “equal weight” will be applied on a case by case basis as to not undermine the strategic function of the CAZ given the pressure from developers to develop residential-led schemes in these areas. Does this mean no more than 50% residential per scheme? Further clarification should be provided.

User:	Royal Borough of Kingston

RBK considers that the spatial strategy should be less reliant on the CAZ to deliver economic growth, to allow for economic success to be better shared across the city as whole (as stated by Policy **GG5, part B**).

User:	London Borough of Hackney

Hackney welcome the explicit recognition that new residential development should not compromise the strategic functions of the CAZ, and that greater weight should be given to offices and other CAZ strategic function including in the “core commercial areas” identified in the City Fringe/ Tech City OAPF.

The use of Article 4 and land use swaps is supported.

User: AECOM

Our thoughts:

London's workforce is increasingly **prioritising flexibility**. This has led to a changing role and function of the workplace, with people able to work from home, the office or coffee shop and with the rise of the part-time Londoner. **Advances in technology**, from wireless networks to mobile devices, are providing greater freedom to work anywhere.

London's ongoing centres hierarchy shift reflects changing priorities. The London Plan is placing increased importance on office and retail **growth outside the CAZ** in Stratford and Old Oak Common. Both centres are well connected and have the potential to function in a similar manner. AECOM believe that other centres including Brent Cross, Woolwich and Croydon will also begin to play a greater role, that will shift the priority from the CAZ to other accessible locations that offer similar needs to an agile workforce.

How Can AECOM Help?

AECOM provides expertise in research, advice and implementation in evolving workplace practices through our Strategy+ team in London. We have worked with private and public sector clients in delivering unique and flexible workspaces that accommodate changing needs of employees.

User: Westminster City Council

The recognition of the importance of offices and other commercial functions within the CAZ is welcomed. However, it is neither necessary nor appropriate for the Mayor to seek to impose the kind of crude requirement about the weight to be given to different uses as is attempted in criterion C. Westminster has a successful track record of fostering successful, sustainable mixed use communities in the CAZ. This experience shows that striking the balance successfully is a matter of judgement across the hugely diverse neighbourhoods that make up our CAZ. This kind of approach could have significant implications for the character and amenity of established residential areas, and could undermine central London boroughs' ability to deliver housing targets.

For this reason, we object to the wording of paragraph 2.5.9 which could undermine the (shared) objective of ensuring mixed and balanced communities. This wording risks the CAZ becoming hollowed out and lost to future residents.

As the DRLP acknowledges that the use of swap and credit arrangements is for individual boroughs to consider, it is inappropriate to deal with them in policy (criteria H and I). It would be better to refer to them in the supporting text as tools boroughs might want to consider using.

User: London Borough of Southwark

The council welcomes the clarity of the policy in stating new residential development should be complementary, and locally oriented, and not compromise the strategic functions of the CAZ. This is a helpful clarification of new land use priorities in the CAZ in the context of the significance of the CAZ as a key driver of economic and cultural uses.

The council supports greater weight given to offices and other CAZ strategic functions in some parts of the CAZ, including the London Bridge, Borough & Bankside OA and equal weight given to offices and other CAZ strategic functions in relation to residential development in the Elephant and Castle OA.

Southwark supports the requirement for net increases in office floorspace in those parts of the CAZ where mixed use office/residential proposals are supported.

With regard to Part F, which supports boroughs to introduce Article 4 Directions to remove office to residential permitted development rights, the council is committed to ensuring the CAZ continues to be protected against office to residential permitted development conversions. Southwark's Planning Committee will be considering a recommendation to introduce such an Article 4 Direction in March 2018.

User:	London Borough of Richmond Upon Thames
No comment	

User: The Northbank BID

Chapter 2: Spatial Development Patterns
Policy SD 4, 5, 6

The Northbank is one of London's most central areas so supports investment in infrastructure that facilitates business operations and a growing economy. The London Plan recognises the diverse functions of central London and the many challenges. We would like to emphasise the challenges for the CAZ and the need to tackle them as a priority. This would benefit a high number of people due to the dense employment and high numbers of visitors.

Central London needs to attract new businesses with a thriving economy and as a healthy location for staff. Further investment is needed to deliver improvements to distribution, freight and servicing to support the needs of business and a strategic plan to deliver it.

Creative solutions are required to ensure that the necessary space is provided, and that more sustainable logistics functions are facilitated within the CAZ e.g. smaller spaces for micro consolidation can support new developments, off-street loading and unloading bays should be required.

Policy SD6 on Town Centres is welcome, although the Plan should better recognise the strategic importance of business-focused hubs and clusters.

User:	Shaftesbury

The thrust of the CAZ policy has switched tone from protection of residential neighbourhoods to protecting the strategic functions of the CAZ and this is welcomed. The policy places focus on new residential development not compromising the functions within CAZ. Offices are given greater weight relative to new residential development in the West End, Soho, Covent Garden and Fitzrovia. We support the policy position which is already in place within Camden and Westminster.

User: Marble Arch Partnership

We support the policy requiring boroughs to bring forward Article 4 Directions to restrict the loss of office space to residential allowed under the General Development Order. However, we would also ask that consideration be given to protecting offices from conversion and redevelopment to hotels. In our area, we have seen three separate proposals to convert office space to hotels in the last year and are concerned that if this trend continues, our current mixed economy will become overly reliant on the visitor economy with the consequent impact on local shops and services.

Policy SD5 and Policy E1 should also encourage the addition of extensions to existing office buildings and that these should take precedence over and above views from Conservation Areas unless they can be shown to have a particularly harmful impact. Extensions to buildings inside Conservation Areas will always be more contentious than outside Conservation Areas, and given the extent of Conservations Areas in and around our BID, to achieve any office and commercial growth must mean generally allowing extensions on sites not in Conservation Areas. But our experience is that such extensions to commercial buildings are often thwarted merely because they are visible from nearby Conservation Areas. We would suggest that Policy E1 should allow for modest extensions to commercial premises on sites outside Conservation Areas unless they have a really significant impact on rather than simply changing the current view. There have also been instances where we think that the impact of servicing has also been used to refuse proposals when such impact is in reality minimal.

User: Berkeley Group

Policy SD5 Offices, other strategic functions and residential development in the CAZ

H Residential development proposals should normally not lead to a loss of office floorspace in any part the CAZ unless there is no reasonable and demonstrable prospect of the site being used for offices and/or alternative provision is made for the provision of net additional office space near the development (including through swaps and credits – see part I below).

User: London First

We welcome the addition of policy SD5, which brings the CAZ SPG (2015) guidance into policy. We welcome the new approach to the mixed-use policy SD5 (g) and the use of land-use swaps and credits and off-site contributions for affordable housing SD5 (i).

However, there is scope to strengthen the wording of this policy to make it explicit that land-use swaps, credits and off-site contributions will be acceptable.

The policy currently reads:
Local approaches to mixed use development of offices with housing should consider the potential to use land use swaps, credits and off-site contributions to sustain strategically-important clusters of commercial activities such as those in the City of London, other parts of the commercial core of the CAZ and the Northern Isle of Dogs.

We request that it is amended to read:
Local approaches to mixed use development of offices with housing should ***use*** *land use swaps, credits and off-site contributions to sustain strategically-important clusters of commercial activities such as those in the City of London, other parts of the commercial core of the CAZ and the Northern Isle of Dogs.*

User: Just Space

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

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

We suggest an addition to Policy SD5A:

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

User: Heart of London Business Alliance

It is vital to prioritise commercial and culture development in the CAZ, especially within the overheated sub-market of the West End. Evidence from the London Office Policy Review 2017 (LOPR) has shown the scale of the challenge in the Westminster CAZ, which has seen a loss of office floorspace since 2005 (even before the temporary permitted development right, and since protections have been put in place); it states that “only Westminster stands out for suffering large scale, residential driven loss of floorspace.”3

From 1990 to 2015 prime commercial rents have increased in the West End by 600%, in comparison to 180% in the City of London and 350% across London.4 The review continues that “the West End remains the market, alongside Midtown, where demand most strongly outstrips supply”5 with a particular challenge to secondary commercial space, which has seen a loss to residential conversion, and rising rents from shortage of supply which has pushed out SME’s and start-ups from the West End market.

The plan has employment projections of 619,300 jobs by 2041 with estimated need for 3.5 million sq. m. of office space in the CAZ and Northern Isle of Dogs (NIOD).6 Over 300,000 square metres of office space have been redeveloped or converted to residential properties in Westminster’s Central Activities Zone since 2010 according the City of Westminster’s own figures7.

In 2016-16, reports were commissioned by New West End Company and Westminster Property Association to determine what level of additional commercial space would be required to accommodate the proposed jobs growth target for the West End. The first concluded that to house the full 77,000 additional jobs a total of 1.9 million sqm of new commercial accommodation would be required. The second showed that to accommodate 30,000 jobs in the Oxford Street district (around 40% of the total) 750,000 sqm of net new commercial space would be required8

With that demand, and a policy environment that remains challenging for intensifying commercial sites in the West End, there is currently only 3.6 years of office space supply available (newly completed, in construction or with planning permission), compared to 8.9 years of office supply in City of London, 26.2 years in Docklands, and 9.5 years in Central London as a whole9. It is in this context that we welcome the broad principles of Policy SD5: Offices, other strategic functions and residential development in the CAZ.

The removal of Policy 4.3 of the current London Plan, which required that “increases in office floorspace…should provide for a mix of uses including housing”, is welcome. It has often proved difficult to implement, especially when looking to intensify smaller sites. This was partially addressed with greater flexibility in Westminster 2015 City Plan and the 2015 CAZ SPG, although figures continue to show a loss of space to residential conversion and lack of supply since these policy changes. Furthermore, the increase in residential space in the West End inevitably leads to conflict with its strategic uses, particularly those associated with the evening and night time economy (ENTE). We do not regard it as sustainable to accommodate significant qualities of new residential development in the core commercial areas of the CAZ and would support the view that residential growth should be “incremental” at most (Table A1.1 – Town Centre Network). Further action is now required, and Policy SD5 should be strengthened given the failure of current policy to stem the loss of commercial space to residential and bring forward sufficient new supply.

New Policy SD5 G states that “mixed use office/residential development proposals are supported in principle…where there is an equivalent or net increase in office floorspace.” We would seek clarity in the guidance about how the Mayor wishes this policy to be implemented as it remains unclear. While para. 2.5.4 states that offices and other CAZ strategic functions should be given “greater weight relative to new residential developments” it is unclear whether the Mayor would regard local policies mandating a residential component on site for any commercial space uplift to be in line with this new policy. Based on the evidence presented in the LOPR and the continuing loss of office floorspace to residential despite policy changes, we regard this clarity as vital to successful delivery of the Plan.

To support a deliverable approach to intensifying employment sites to meet the very ambitious targets of the plan, and in line with Policy GG2: Making the best use of land, we feel that Policy SD5 I should be strengthened to make it explicit that in core commercial areas of the CAZ, local approaches to mixed-use development should *always* allow land use swaps, credits and off-site contributions to sustain the strategically important commercial activities of these areas. Explicit reference to the International centres of the West End, Knightsbridge and WERLSPA should be included here.

A coordinated approach to introducing Article 4 directions, as outlined in Policy SD5 F, to remove office to residential permitted developments is strongly supported, as an essential first step to protecting office space from usually permanent loss to residential. Westminster City Council is currently consulting on their draft Article 4 Direction, and we fully support this. There is no evidence that the type of residential space that would be brought forward in these extremely high value areas would provide any benefit to Londoners or meet any housing need without severely compromising viability. Indeed, Westminster City Council point out that “units of housing being delivered tend to be large…and it is questionable whether this represents optimisation of the number of residential units on development sites as required by policy S14 of the Westminster City Plan.”

User:	Federation of Small Businesses
This is an important point and should be adhered to.	

User:	Federation of Small Businesses

We feel the words of SD5C should be changed from

‘Offices and other CAZ strategic functions are to be given greater weight *relative to* new residential development in other core commercial areas of the CAZ including:’ to

‘Offices and other CAZ strategic functions are to be given greater weight **than** new residential development in other core commercial areas of the CAZ including:

User:	Federation of Small Businesses

We feel the words of SD5D should be changed from

‘Offices and other CAZ strategic functions are given equal weight *relative to* new residential in other part of the CAZ not covered in parts B or C above including:’

to

‘Offices and other CAZ strategic functions are given equal weight **than** new residential in other part of the CAZ not covered in parts B or C above including:’

User:	Federation of Small Businesses

We encourage the Mayor to push Government to consider evidence on what has taken place as a result of the relaxation of Permitted Development Rights and advocate that a new policy be introduced whereby any current B1a office or B1c light industrial space in Greater London, which is occupied by more than 20 per cent (by floorspace in business use) cannot be converted under Permitted Development Rights for offices/light industrial to residential.

User:	Federation of Small Businesses
There must be safe guards put in place to make sure that the right commercial space is kept at the right price and in the right locations.	

User:	Federation of Small Businesses

The FSB London position is that where there is no reasonable and demonstrable prospect of the site being used for offices it can be converted. We feel a period of two years of the property being actively promoted for its current use would be a fair period of time before allowing conversion.

User: Heart of London Business Alliance

Our focus is to ensure that the London Plan fully recognises the importance of the West End, and more broadly the Central Activities Zone (CAZ). The six hectares of the West End generates £51 billion GVA annually, more than the £43.9 billion of the City and as much as the whole of Wales. It accommodates over 650,000 jobs and is expected to generate at least 77,000 new jobs by 2036. The hyper-connectivity and exceptional productivity of the West End plays a crucial role in London's economic success, but more importantly for the new London Plan, it will accommodate many of the new jobs and businesses our city's economy will generate, and that will fund much of the Mayor's ambitious plans for new infrastructure.

To truly realise the benefits of existing major public investment, and the taxation that will be generated from growth for local authorities and the Exchequer, the strategic functions of the CAZ must be prioritised, particularly in the commercial core of the West End. Given the importance of the West End to the UK's economic growth we believe that the London Plan should contain greater and more detailed guidance for its future growth.

We support a more flexible approach to intensifying employment sites in the CAZ, including through greater height and density. We argue that local approaches to mixed-use development should not be prescriptive and allow land use swaps, credits and off-site contributions in core commercial areas to sustain strategically important activities.

London already has the most varied and developed evening and night time economy (ENTE) in the world and we warmly welcome the far more positive policies on the evening and night-time economy within the plan, including the incorporation of an agent of change principle.

User:	Pilbrow & Partners

Policy should seek to achieve a balance between CAZ functions, including offices, commercial uses and residential use. Policy as drafted is overly restrictive and would hinder delivery of residential development in the CAZ as a whole. Delete subsection 3 of policy - Offices and other CAZ functions are to be given greater weight relative to new residential development… “

User:	British Property Federation

We are encouraged by the Mayor actively prioritising office space in the CAZ. It is vital that London has the required amount and type of office space which is suitable for any type of business from small start-ups to larger, more established businesses.

User: East of England Local Government Association

The policy emphasis on offices is understandable given London's forecast growth in office-based employment of 619,300 over the 25 years of the plan. At 24,772 per annum, this is 64% more than the 15,150 per annum in the current adopted plan. The LSE's review of research noted the relationship between London's employment growth and commuting and highlighted that managerial-technical occupations account for over 75% of net commuting into London and the entire growth in net inward commuting between 2004 and 2016 (LSE, Review of Research on Migration Influences and Implications for Population Dynamics in the Wider South East, page 78). Given that London's own research highlights that most (288,800) of the increase in office employment will occur in the Central Activity Zone, and that commuting from the WSE is so significant, there is a clear need to deliver a wide range of transport measures to meet this increase in demand.

The Draft London Plan places the potential for Stratford to act as a satellite for major office space but only after demand has exceeded the capacity of the Central Activity Zone and the Northern Isle of Dogs. The London Plan should be setting a positive framework to facilitate development and this hierarchy should not restrict the potential for "good growth" to occur in these satellite locations even if there is capacity within the other areas.

User: Catalyst Housing Limited

THE CENTRAL ACTIVITIES ZONE (CAZ)

Draft Policy SD5 relates to offices, other strategic functions and residential development in the CAZ.

Criterion C sets out the areas in which offices and other CAZ strategic functions are to be given greater weight relative to new residential development. This needs to be considered on a finer grain approach; at the moment, it appears to be inconsistent with other parts of the draft Plan. As an example, with some exceptions the areas within criterion C include Opportunity Areas. CHL would also note that nonresidential uses within the CAZ will, in practice, be influenced by the market and the policy therefore needs to be sufficiently flexible to be resilient to changes over time.

User: Royal London

Policy SD5 Office, other Strategic Functions and Residential Development in the CAZ.

RL strongly welcome the recognition and importance given to office and other CAZ strategic functions and the identification that greater weight in identified areas will be given to these uses than residential accommodation.

It is the repeated experience of RL that 'mixed use' policies at a local level are applied with limited flexibility and consideration to the specifics of the site, the overall quality of the scheme and the developments viability. The rigid application of mixed use policies at a local level seeking alternative uses (chiefly residential onsite) as part of commercial schemes (strategic function) results in many cases to less efficient developments which undermines the quality of the development and floorspace provided. The inflexible application of mixed use policies on often constrained Central London sites introduces significant cost, complexity and risk to the development process undermining the confidence that we and others can have in the planning process and consequently posing a real threat to delivery. There is often no consideration of whether residential housing is appropriate in a specific location and marketable as part of a mixed use scheme. In addition, the development of a mixed use building in many cases has a significant adverse impact on the value and attractiveness of the commercial space provided and the new tenant profile leading to potentially lower rents and longer voids impacting on the overall viability of the scheme and the vitality/economic function of the area.

RL supports the removal of a mixed-use policy at a strategic level but consider that greater clarification/certainty is required within the policy. We would advise that there needs to be first a recognition in the wording of policy SD5G that the appropriateness of mixed use development (housing alongside office development) should first be considered (from a practical, overall development quality and viability perspective). At a very minimum we would request that the wording of policy (SD5i) is amended so that local approaches will allow land use swaps, credits and off-site contributions (all subject to viability) as an acceptable response to these mixed use requirements rather than the current wording which in unduly ambiguous and is likely to be ignored at a local level. RL have extensive recent experience of bringing development forward within both the City of Westminster and London Borough of Camden where local mixed-use policies are adopted.

User:	London Borough of Wandsworth

Large, high spec offices will continue to be encouraged in Nine Elms to meet the demand for the central London Office market and to achieve a critical mass of economic uses around Battersea Power Station. The reference to the competing policy requirements of office and housing being given equal weight in decision making is welcomed.

User: New Policy Institute

Add to A:
But neither should pursuit of those strategic functions [of the CAZ] be at the expense of the low paid workforce on which it depends nor the Mayor's goal of promoting walking and cycling.
Delete C(4), D(1) and D(2)

About 1 in 6 low paid jobs in London are in the central area, at a job density four times that of the all-London average. Just under half of all low paid jobs in London are in Inner London. The higher cost of commuting (relative to earnings) for those doing low-paid work means that is in their interests to live as close to work as possible. Given the higher job densities in central and inner areas, maximising the number of low-cost rented homes (social rent/London Affordable rent) within or close to the CAZ is also an effective way of supporting the Mayor's goal for 80 per cent of trips to be walk, cycle, or public transport by 2041. While a balance must be struck between competing uses, policy SD5 as drafted adopts an extreme position.

User: London Property Alliance

The Alliance supports the relative prioritisation of residential, commercial and other strategic CAZ functions set out within Policy SD5. This is consistent with the CAZ SPG.

The CAZ is home to approximately 3% of London's population (c. 240,000). In contrast, it makes up almost half of London's Gross Value Added ('GVA') (c. £140bn in 2012) and 9.4% of total UK GVA. Residential accommodation, and in particular existing residential communities, are a feature of parts of the CAZ, including parts of the West End, although – unlike its office, leisure and cultural function – these figures illustrate that the CAZ's residential offer is not of the same strategic significance to London and the UK as its economic role.

Whilst there may, consequently, be some locations within CAZ where some residential development may be appropriate, this should only be outside of the core areas, in locations where there is no risk of residential development compromising the strategic functions of the present day CAZ or its capacity and potential to accommodate the growth of these strategic functions in the future. It is vital that the long-term capacity to accommodate growth is supported, not constrained.

The Alliance suggests that offices and other strategic CAZ functions should, in addition to those areas listed in part C, also be given priority within the commercial areas of LB Camden that are beyond the West End but which have a distinctly commercial character, such as Holborn/Theobalds Road and Euston. This would be consistent with LB Camden's adopted local plan which identifies these areas as "predominantly commercial." We suggest Part C is amended, accordingly.

User: London Property Alliance

Locally-set mixed use policies, requiring a proportion of new office or commercial development, can be a substantial constraint on development capacity. The Alliance therefore supports the removal of mixed use policy at a strategic level.

As we have set out above in relation to the West End, mixed use policies should not be applied to other commercial uses, such as retail and hotels, that contribute to the mixed use character and distinctiveness of the West End.

In respect of offices specifically, draft Policy SD5(I) should be strengthened to clearly set out that the use of off-site contributions, land use swaps and land use credits will be acceptable as a method of satisfying such local mixed use policies. Meeting mixed use requirements through off-site provision, either as part of a land use swap or package, or through an estate or portfolio approach, is often the most efficient way of minimising the effect of mixed use policies on the deliverability of commercial development whilst maximising the yield/outturn of residential accommodation provided. Strategic policy should be clear that such tools may be used to satisfy local mixed use policy. Their use is recognised already in the CAZ SPG.

The Alliance therefore propose that draft Policy SD5(I) is amended as follows:
"Local approaches to mixed use development of offices with housing should ~~take into account the potential to use~~ permit the use of land use swaps, credits and off-site contributions to sustain strategically-important clusters of commercial activities such as those in the City of London, other parts of the commercial core of the CAZ and the Northern Isle of Dogs."

User:	HB Reavis UK Limited

HB Reavis supports policy SD5 which recognises the importance of offices within the CAZ and which states that offices and other CAZ strategic functions are to be given greater weight relative to new residential development in core commercial areas of the CAZ, including Opportunity Areas.

User:	Bishopsgate Goods Yard Regeneration Limited

Our client supports the draft London Plan actively prioritising office space in the CAZ. It is imperative that London has the required amount and type of office space to ensure the success of the city.

User: The British Library

Policy SD5 – Offices, other strategic functions and residential development in the Central Activities Zone (CAZ)

This policy is supported and the British Library fully agree with Part A of the policy, that residential development should not compromise the strategic functions of the CAZ, given that this is one of the most connected places offering a range of services and opportunities for wider growth, not just for offices but also for other uses related to research and development, innovation and learning.

User:	Elephant & Castle Properties Co Limited

Policy SD5 – Offices, other strategic functions residential development in the CAZ. We support the exclusion of Elephant & Castle from those Opportunity Area's where offices and other CAZ strategic functions are given greater weight relative to new residential development – this is representative of the significant residential capacity of Elephant & Castle alongside (and without detriment to) delivery of other main town centre uses, as evidenced by the current application. We therefore support the application of equal weight to these uses, as drafted under SD5(D). However, bearing in mind this equality of weight between uses, and the references to agglomerations of offices elsewhere in the supporting text, SD5(H) should be more flexible insofar as provision of a net increase in office space should not be required. If it is demonstrated that office floorspace has no reasonable prospect of being used then the test should be fulfilled, rather than then having to provide alternative provision elsewhere, let alone a net increase. This policy should be revisited and redrafted.

User: Unite Students

Offices, other strategic functions and residential development in the CAZ - Policy SD5

In addition to the draft student accommodation policy, Unite are concerned about the mixed messages provided by draft Policy SD5 ‘Offices, other strategic functions and residential development in the CAZ’. This places a blanket policy presumption in favour of office development across areas such as the City Fringe which conflicts with the local development plan policy. To ensure the plan is sound this conflict should be reconciled in favour of the local development plan which is better placed to deal with local issues. Thus this element of the policy should be amended and we recommend the following wording:

Recommendation: ***“commercial core areas identified in the City Fringe/Tech City Opportunity Area Planning Framework, aside from areas falling outside the local plan employment policy designations”.***

User: Landsec

In respect of offices specifically, SD5(I) should be strengthened to clearly set out that the use of off-site contributions, land use swaps and land use credits will be acceptable as a method of satisfying local mixed-use policies where they are applied. Meeting mixed use requirements through off-site provision, either as part of a land use swap, or through an estate or portfolio approach, is often the most efficient way of minimising the effect of mixed use policies on the deliverability of commercial development whilst maximising the yield/outturn of residential accommodation provided.

We therefore endorse the Alliance proposal that that Policy SD5(I) is amended as follows:

Local approaches to mixed use development of offices with housing should ~~take into account the potential to use~~ permit the use of land use swaps, credits and off-site contributions to sustain strategically-important clusters of commercial activities such as those in the City of London, other parts of the commercial core of the CAZ and the Northern Isle of Dogs.

User: Mr Drew Stevenson

The question of housing within the CAZ has been a major issue for decades. As the person who conceived the CAZ concept in Westminster City Council's District Plan (WDP) in the seventies, and introduced it to strategic planning in the Alterations to the Greater London Development Plan in the eighties, I am particularly aware of the issues.

In the seventies, housing in CAZ was largely under threat from commercial development, exacerbated by proposals to make permanent hundreds of temporary permissions for residential accommodation to be used as offices for 25 years after the War. In order to maintain central London's mixed use character and to meet the need for a range of housing, housing was included as a Central London Activity in the WDP. This was strongly opposed at the Public Inquiry into the WDP - but the arguments for the Policy prevailed.

The issue has never really gone away, the key question being whether housing should, or should not, be defined as having a central London function. The number of homes in central London continued to decline in the seventies, but then the pendulum swung the other way.

Recently, in some areas, it has been argued that housing has taken over considerable amounts of office, showroom and workshop space and the draft Plan appears to wish to curb that. I think however it would be difficult to claim that the growth of housing in the centre has harmed the central London economy. This is particularly so because of the increase in home/work living, where a residential use does not necessarily preclude an office/studio use in the same spacer. Whilst I am sympathetic to the issue, I think the approach in the draft Plan is a sledgehammer to crack a nut. Under the policy I think we may lose too much housing in the centre such that the specific character of central London with its pleasant mix of residential, commercial and cultural uses in a 24 hour economy are put at risk. Other policies in the Plan rightly seek to ensure that housing is occupied and 50%bis affordable. Provided that those policies are met, I see no reason why some further growth of housing should be denied.

I therefore invite the inspector to examine this draft Policy. Specifically, I would invite consideration to amending the draconian wording of SD5 C, D3), and H - bearing in mind the residential enclaves of the Barbican, Covent Garden, the West End, Fitzrovia, Soho etc, etc, all of which greatly enhance the "offer" and appeal of central London. Conversely I would support the introduction of Article 4 Directions as suggested in SD5 F.

User: Lendlease

We agree that the Elephant and Castle Opportunity Area has potential to deliver greater levels of housing alongside employment than the other CAZ Opportunity Areas. As such, we strongly support Policy SD5, which stipulates that offices and other CAZ strategic functions may be given equal weight relative to new residential development.

Lendlease generally support Stratford as a future potential reserve location for CAZ office function; however, this should be based on evidence of local need at the point of time in the future and needs to be carefully balanced against the delivery of housing and retail, office space should not be prioritised without assessment.

User:	Cross River Partnership

Commercial, Strategic and Cultural priorities - the importance of these being prioritised over residential in the CAZ cannot be over-emphasised, including where there are recognised specialist clusters. However, office development should not be prioritised at the expense of other strategic CAZ functions, including development that supports residential communities.

The Mayor’s commitment to work with boroughs and support them to introduce Article 4 Directions to remove office to residential permitted development rights across the whole of the CAZ and the Northern Isle of Dogs (and those parts of Tech City and Kensington & Chelsea lying outside the CAZ) is strongly welcomed. This re-enforces and highlights the crucial importance of the CAZ + as a business-orientated area. Conversions of office and industrial property to residential would deprive the Zone of potential for developing much needed new space.

User: London Borough of Camden

The Council supports the strategic functions of the CAZ, but considers that Policy SD5 gives too much priority to office development at the expense of other strategic CAZ functions and development that supports residential communities in Central London.

The Council notes that Figure 2.16 identifies a number of specialist clusters that are wholly or partly in the LB Camden segment of the CAZ. These include an academic cluster at UCL/ University of London and a health cluster at University College Hospital. As currently constructed, Policy SD5 would give the same weight to offices as to academic uses within academic clusters, and the same weight to offices as to health uses within the health clusters. A possible consequence of this wording is that UCL/ University of London and University College Hospital would face greater competition with office developers when seeking to acquire additional sites in the academic and health clusters, and would be less able to expand in their existing locations.

We therefore propose that the opening phrase of criteria C and D should be amended to provide for local planning authorities to give priority to the particular strategic function upon which each specialist cluster is based, as follows:
- in Criteria C and D, the phrase "Offices and other strategic functions" should be replaced with "Offices and / or other CAZ strategic functions (as appropriate to the particular specialist cluster)..."

As indicated in the Council's comments on Policy SD4, three Wards in LB Camden fall wholly within the CAZ, and on the basis of the 2011 Census these provided 14.5% of the Borough's household residents and 14.4% of the Borough's resident workforce in just 3.6% of the Borough's total area. These communities do not occupy predominantly residential neighbourhoods that can be artificially separated from other areas within the West End, Covent Garden, Fitzrovia and Bloomsbury. Policy SD5's prescriptive requirement to prioritise new office development over new residential development in the West End and the clusters of specialist CAZ strategic functions would dramatically reduce the ability of these communities to sustain themselves, cutting the potential for new housing supply and fuelling further increases in rents and sales values.

As also indicated in the Council's comments on Policy SD4, the Opportunity Areas at King's Cross Central and Euston are planned to provide new residential communities (respectively 1,900 homes – around half of which have been delivered - and 2,800 to 3,800 homes). These figures were confirmed by the GLA in the London Plan as published with amendments in March 2016, and similar figures for Euston appear in the new London Plan and in the Euston Area Plan published jointly by the GLA, TfL and LB Camden in January 2015. A prescriptive requirement to prioritise new office development over new residential development in all Opportunity Areas (except Vauxhall, Nine Elms, Battersea and Elephant and Castle) is not consistent with the GLA's own expectations for housing delivery at King's Cross and Euston. In particular, any measure that could suppress the delivery of homes below 2,800 at Euston, or reduce the total delivery at King's Cross significantly below 1,900 homes, could also harm the ability of LB Camden to deliver the 1,086 homes per year envisaged by the London Plan Table 4.1.

The Council has operated local plan policies to deliver residential development in tandem with new commercial development in Central London for over 10 years. For developments in the LB Camden segment of the CAZ, these policies have sought to secure half of additional floorspace as housing – giving equal weight to new residential development and new development for CAZ strategic functions including offices. These policies have incorporated many areas of flexibility, such as taking account of specialised operational requirements, public funding and the needs of existing users. Nevertheless, these policies have delivered large numbers of homes in developments that would otherwise have been unlikely to deliver any, sustaining the mixed-use character of Central London, adding diversity to the sources of housing supply in LB Camden, and significantly adding to overall housing supply in the Borough. Notwithstanding that the Draft Plan recognises that it is appropriate for boroughs to include mixed use policies in their development plans, the prescriptive requirement in Policy SD5 to prioritise new office development over new residential development in the West End and the clusters of specialist CAZ strategic functions would prevent Camden's successful existing policies from operating in future.

Examples of development proposals that have followed Camden's policy and have delivered (or are delivering) a mix of additional space for CAZ functions and new housing include:

Scheme	CAZ elements	Residential elements	Status
St Giles Central, 1-13 St Giles High Street 2005/0259/P	Redevelopment of existing offices (33,750 sq m) for new offices (53,000 sq m) plus retail (3,350 sq m)	109 additional dwellings including 29 social rent and 24 intermediate	Completed 2010/11
Unison Headquarters Building (former Elizabeth Garrett Anderson Hospital) 126 - 144 Euston Road NW1 2007/3736/P	Redevelopment of hospital (8,700 sq m) for new offices (11,580 sq m) and retail (50 sq m)	47 additional dwellings including 14 social rented and 3 intermediate	Completed 2010/11
Regent's Place North East Quadrant, Hampstead Road NW1 2007/0823/P 2011/2345/P 2011/2500/P	Redevelopment of mixed office, University accommodation and retail (20,000 sq m) for offices (47,860 sq m) and mix of retail and community facilities (3,600 sq m)	Redevelopment of 42 market homes for 162 homes total (120 additional) including 58 social rent and 10 intermediate	Completed 2013/14
Saatchi Building – 80 Charlotte Street 2010/6873/P	Development of existing offices (27,200 sq m) for new offices (35,600 sq m) plus flexible office/ retail (4,250 sq m) offices plus 235 sq m retail	55 additional dwellings including 10 social rent and 4 intermediate (plus 1 social rent and 1 intermediate off-site)	Under construction, commenced 2015
21-31 New Oxford Street 2014/5946/P	Former PO sorting office (30,300 sq m) developed for new office space (35,300 sq m) and a mix of retail and community facilities (4,160 sq m)	21 additional dwellings (all affordable) including 13 affordable rent and 8 intermediate	Under construction, commenced 2016/17
1 Triton Square NW1 2016/6069/P	Development of existing offices (29,080 sq m), church/ community facilities and gym for extended office (45,950 sq m), gym and retail	22 additional dwellings (all affordable) including 16 affordable rent and 6 intermediate	Permitted Nov 2017

Policy SD6 Town centres

User: Mr Peter Eversden MBE

Section C of Policy SD6 relates new higher-density development to the current and future accessibility of public transport but the policy does not make clear how the local social infrastructure in the town centres will determine what density should be permitted in new schemes to avoid overloading those facilities. Section I should have the words added at the beginning 'Social infrastructure capacity and services will restrict the new housing and even the commercial developments that can be approved and therefore . .'

It is essential that the Replacement London Plan requires boroughs to consider information on the public transport accessibility level (PTAL) figures for all locations. This information is necessary to plan for where transport should be improved by using whatever funding sources exist to allow more intensification of land use for development. It is also used by boroughs to make decisions on planning applications received to ensure that permission is given only for housing schemes of a density that will not cause overcrowding on transport.

Other advantages of the current London Plan density matrix and its associated advisory paragraphs is that they guide boroughs in assessing new development applications based on the distance from town centre facilities and consideration of the local context and character. Despite the details in the policy of what should be taken into account, the omission of the density matrix does not seem to be necessary.

There should be an additional section in Policy SD6 for 'The traffic associated with waste management collections for businesses in town centres should be coordinated, to avoid road congestion, bus delays and pollution.

The content of paragraph 2.6.1 are important and should be covered by an additional section in Policy SD6 following 'I' for 'Public squares, markets, parks, gardens and other open spaceson should be planned to meet the local needs and should be well maintained.'

Paragraph 2.6.1 should mention that many town centres are through routes for traffic and there should be a section in Policy SD6 to cover that. It could state 'The movement of vehicles in town centres which have major through routes roads should be considered for implementing traffic diversions and sections that are pedestrianised.'

The use of the word "higher-density" in Policy SD6 A 2) line two is **meaningless** because there is no explanation of what it is of which new

density should be "higher". The words "higher-density renewal" should be replaced by 'renewal at optimum density.'

Policy SD6 must accord with other policies in the Replacement London Plan for the density of housing to be "optimised", as in the comments made in this submission for Policy GG2 and which should be considered also here for this comment on Policy SD6, as there are policies about **optimisation** in Policy D2 B, Policy D4 A, Policy D6 A 3), Policy H1 B 2), Policy H12 and paragraphs 3.6.1 and 4.12.2. Those could be quoted as cross references in a paragraph on density following SD6.

To be compatible with those other policies, the words "higher-density" should be changed to 'optimum density' in section C of Policy SD6 also.

It is only when density is **optimised** to relate to local social infrastructure, the asccessibility and capacity of public transport and the local context and character that new housing schemes will be sustainable and not cause harm. The current London Plan's density matrix which covered those matters stated that when they are applied, those considerations would result in "sustainable residential quality". That quality must not be compromised by a change in this version of the Plan to the seeking of high densities where they are not appropriate.

Policy SD6 could have another section for 'The impact of major shopping malls like Westfield on nearby town centre businesses should be examined, monitored and mitigating actions taken.'

User:	Mr Peter Eversden MBE
Policy SD6 F needs a cross reference to Policy D12 Agent of Change.	

User:	Mrs Lynne Bailey

Point D - I am personally opposed to 'Build to Rent' unless it is social housing which is being built. (In which case I have no objection). My opinion is that building should help families who are trying to get on the housing ladder (or move up it) or people who are in need of social housing. I would not want to see scarce resources be used to assist private landlords in simply becoming richer!

User: Mr Bob Phillips

The plan for greatly increased development of housing in the suburbs is necessary. Without careful attention to making those places viable and attractive, we will just create chaos and misery. That is why the development of vital town centres is so important. There is one particular, dramatic, example of this - Tolworth in the Borough of Kingstom - an Opportunity Zone. This place, right now, is a cross-roads of the A3 and A240: with no real town centre, and what there is is cut in two by a dual carriageway. There is scope for a large amount of development here - of housing and office space, strategically positioned. But the growth of this suburb will be unsustainable unless a proper town centre is created. The GLA (and the Borough) must not allow development to do ahead without the town centre being developed at the same time. Let me put it positively: there is great opportunity for growth now in Tolworth, but only if the opportunity is taken at the same time to make the town centre.

User:	Ms Caroline Walton

Active street frontages. This is especially important in terms of perceived safety. For example in my borough (Barnet) the new developments of flats in Colindale along Grahame Park Way and Aerodrome road do not have these. As a result they are alienating and I would not feel safe after dark walking to these flats. These sort of developments only encourage car use and I hope will they will be objected to at planning stage as part of the New Plan

User: Future High Streets

Dear London Plan team,

I have a couple of important amendments to suggest to **Policy SD6**: see text changes in *italics:*

B. The adaptation and restructuring of town centres should be ***promoted*** in response to the challenges and opportunities presented by multi-channel shopping and changes in technology and consumer behaviour, including improved management of servicing and deliveries.

C. The potential for new housing within, ***in vacant and under-used upper floors*** and on the edges of town centres should be realised through higher-density mixed-use or residential development, capitalising on the availability of services within walking and cycling distance, and their current and future accessibility by public transport. Residential-only schemes in town centres may be appropriate outside of primary and secondary shopping frontages where it can be demonstrated that they would not undermine local character and the diverse range of uses required to make a town centre vibrant and viable.

The reason for the changes in B are set out in the groundbreaking work I have led in relation to overcoming fragmented ownership; I have worked with the Mayor and LB Barking & Dagenham in pursuing a feasibility study in Barking town centre - see attached report **Town Centre Investment Zones**, published by the British Property Federation.

The reason for addition to C is that the potential for releasing housing in vacant and under-used upper floors could be significant. See our report **Living on the High Street**, which applies many of the same principles for fixing the retail floor, as set out n the TCIZ report.

User: Campaign for Better Transport

Please see attachment for full details:

"7. We strongly support policies SD6-SD10 inclusive on Town Centres. Not only are Town Centres good in themselves for raising the quality of life, their continued prosperity is key to delivering the aims of improving air quality and increasing the share of modally sustainable means of transport to 80%. If encouraging people to walk for 20 minutes a day is important, and it is, how much more should we incentivise those who are able to do so to carry their own shopping rather than ordering on line and promulgating an inexorable growth in white van deliveries alongside a decline in Town Centres. The Plan needs to include proposals for such incentives."

User:	Levitt Bernstein
Agree.	

User:	Levitt Bernstein

The fact that trip journeys for home deliveries has increased significantly, raises the question as to whether we need to constrain the delivery times in certain areas of the city to reduce vehicular traffic and congestion which is heightened by deliveries.

User:	Levitt Bernstein
Agree.	

User: London Forum of Amenity and Civic Societies

Section C of Policy SD6 relates new higher-density development to the current and future accessibility of public transport but the policy does not make clear how the local social infrastructure in the town centres will determine what density should be permitted in new schemes to avoid overloading those facilities. That should be clarified.

Policy SD6 D proposes the particular suitability of town centres for smaller households (build to rent, old people's housing and student accommodation). One and two bedroom flats are suggested as a priority. There is a danger that this policy will create a less mixed community with a form of ghetto/enclave for young and old, leaving out families. In a town centre area, in particular, there should be an inclusive and diverse range of young, old and families planned for in order to sustain and encourage a centre which is lively throughout week days, evenings and weekends. Without this there is a risk of catering for short term need and so detracting from rather than revitalising town centres.

Policy SD6 F needs a cross reference to Policy D12 Agent of Change

The content of **paragraph 2.6.1** are important and should be covered by an **additional section** in Policy SD6 on the planning and management of public squares, markets, parks, gardens and other open spaces.

The use of the word "higher-density" in **Policy SD6 line two** is meaningless because there is no explanation of what it is of which new density should be "higher".

Policy SD6 must accord with other policies in the Replacement London Plan for the density of housing to be "optimised", as in the comments made in this submission for Policy GG2 (which should be considered also here for this comment on Policy SD6 and which quotes about optimisation from Policy D2 B, Policy D4 A, Policy D6 A 3), Policy H1 B 2), Policy H12 and paragraphs 3.6.1 and 4.12.2).

To be compatible with those other policies, the words "higher-density" should be changed to 'optimum density' in section C of Policy SD6. It is only when density is optimised to relate to local social infrastructure, the accessibility and capacity of public transport and the local context and character that new housing schemes will be sustainable, not cause harm and obtain the support of local people.

The current London Plan's density matrix which covered those matters stated that when they are properly applied, those considerations would

result in "sustainable residential quality". That quality must not be compromised by a change in this version of the Plan to the seeking of high densities where they are not appropriate.

Policy SD6 could have an additional section for 'The impact of major shopping malls like Westfield on nearby town centre businesses should be examined, monitored and mitigating actions taken.'

Section I of Policy SD6 should have the words added at the beginning 'Social infrastructure capacity and services will restrict the new housing and even the commercial developments that can be approved and therefore the provision of. . .'

Also, it is essential that the Replacement London Plan requires boroughs to consider information on the public transport accessibility level (PTAL) figures for all locations. This information is necessary to plan for where transport should be improved by using whatever funding sources exist to allow more intensification of land use for development. It is also used by boroughs to make decisions on planning applications received to ensure that permission is given only for housing schemes of a density that will not cause the problems above. Other advantages of the current London Plan density matrix and its associated advisory paragraphs is that they guide boroughs in assessing new development applications based on the distance from town centre facilities and consideration of the local context and character. Despite the details in the policy of what should be taken into account, the omission of the density matrix does not seem to be necessary. There should be additional sections in Policy SD6 to deal with the traffic associated with waste management collections for businesses in town centres, to avoid road congestion, bus delays and pollution.

The policies for building housing within and on the edges of town centres are very prescriptive. It seems that Boroughs have not been allowed to define these areas. The area of 800 metres from the edge of a town centre or train or tube station covers a very large area in any London Borough. It is in these areas that the Plan states that new housing should be realised through higher density mixed use or residential development. This could adversely affect the special characteristics of many areas. **More flexibility should be incorporated in the London Plan to allow Boroughs to identify the best approach to growth in their area which they will know in detail best. Protection of valued local character should be a prime consideration so that development is undertaken in a way that preserves what is most valued by those who live and work in the area, both now and for future generations.** In that way, local residents' resistance to development should reduce.

User:	King and Company Ltd

We broadly support the objectives of Policy SD6, but particularly criterion C.

In many locations, there are highly sustainable opportunity sites close to defined centres and also close to transport hubs. We therefore support the opportunity for proposals close to defined centres to drive up opportunities for high density and mixed use development.

With reference to the hierarchy of centres, this can be equally applicable for higher order centres through to other lower order centres.

User: Mr Simon Hunt

Once again, housing-led intensification, this time around town centres. This is something of a manic obsession, a one-goal design proposal.

It would make better sense to preserve the non-housing aspects of town centres to encourage the local economy, and thereby encourage development in the outlying areas of the town centre. This fixation on housing intensification is a one-dimensional view of how to enhance London and singularly neglects the need to increase services and commercial enterprises around a newly intensified population.

I also contend - once again - that there is a dangerous implication to a high population density. Ghettos. High quality affordable housing is better achieved by lower/medium density that does not blot out the sun.

User: London Assembly Green Party Group

Policy SD6 A (6) includes reference to the Healthy Streets approach but should be amended to include an overall goal for reducing traffic in these areas through planning.

Policy SD6 C should also be amended. It includes a welcome comment on reducing the need to travel, which is absent from many other places in the plan, but talks about “capitalising on the availability of services within walking and cycling distance” instead of “maximising” these.

Part I doesn’t quite make up for this, and should also be amended, as shown below.

Proposed amendment to policy SD6 C (addition in bold):

I The provision of social infrastructure should e enhanced, and facilities should be located in places that **reduce the need to travel and** maximise footfall to surrounding town centre uses.

User:	The Access Association

The wording in H should be amended from ‘may include Shopmobility Schemes....’ to ‘should include Shopmobility Schemes....’

Shopmobility schemes can provide essential support for disabled and older people enabling them to take full advantage of retail and other services not otherwise available to them. Shopmobility schemes should be supported to provide not just wheelchairs and scooters but volunteers who can act as guides for blind and partially sighted people, people living with dementia and people with sensory/neurological processing difficulties who benefit from assistance while shopping.

User: Future High Streets

Dear London Plan team,

I have a couple of important amendments to suggest to **Policy SD6**: see text changes in *italics:*

B. The adaptation and restructuring of town centres should be *promoted* in response to the challenges and opportunities presented by multi-channel shopping and changes in technology and consumer behaviour, including improved management of servicing and deliveries.

C. The potential for new housing within, *in vacant and under-used upper floors* and on the edges of town centres should be realised through higher-density mixed-use or residential development, capitalising on the availability of services within walking and cycling distance, and their current and future accessibility by public transport. Residential-only schemes in town centres may be appropriate outside of primary and secondary shopping frontages where it can be demonstrated that they would not undermine local character and the diverse range of uses required to make a town centre vibrant and viable.

The reason for the changes in B are set out in the groundbreaking work I have led in relation to overcoming fragmented ownership; I have worked with the Mayor and LB Barking & Dagenham in pursuing a feasibility study in Barking town centre - see attached report **Town Centre Investment Zones**, published by the British Property Federation.

The reason for addition to C is that the potential for releasing housing in vacant and under-used upper floors could be significant. See our report **Living on the High Street**, which applies many of the same principles for fixing the retail floor, as set out n the TCIZ report.

many thanks

John

John Parmiter FRICS FRSA MRTPI

Director

Future High Streets

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07796177426

User:	The Enfield Society

"Transport hubs are referred to in terms of both transport improvements and Town Centre plans. There is a clear proposal that significant development opportunities including new housing should take place within existing town centres by increasing density, building higher and making use of vacant and brownfield sites. The Society supports this approach, but considers that each town centre must be considered on its merits. The plan does not recognise that some town centres and transport hubs are also conservation areas or have valuable Listed Buildings that need protection from unsympathetic development. Southgate Circus and parts of Enfield Town are examples of areas that need protection from excessive and unsympathetic development. With regard to the height of new buildings this needs to be carefully controlled to prevent overshadowing and the creation of micro-climates in town centres - wind tunnels etc."

User:	Ms Meenakshi Sharma

G

In Ilford South we have a huge number of hotels and b&bs in the area. This should not be clustered in this way, leading to a huge reduction in the amount of residential property available. Policies to keep numbers to a reasonable level and to ensure they are distributed around the borough are essential so that the poorer wards are not used as a dumping ground for these establishments.

User: Love Wimbledon BID

We recommend that it is recognised in The London Plan that vital and viable town centres across London, with a mix of services and employment opportunities become sustainable communities, reducing the need for people to travel across the city with positive ramifications for issues such as congestion, air pollution and capacity. Promoting a work local campaign for businesses alongside a shop local initiative should be developed and inccentives provided to support this.

Affordable workspace within town centres needs to be made a requirement to ensure town centre do not become unaffordable for any business except the multinationals that then lose the buy in to the local community and economy.

Provisioning for cultural uses is equally important to encourage social engagement within town centres providing your visit to your local town as a humanising, enjoyable and fulfilling experience rather than the previous demands of retail therapy.

Residential housing within this mix can cause tensions as town centres are busy bustling places 24/7. This is often incongruous with residents so planning must take this into account. Night time deliveries, cleansing, waste collections etc alongside the night time economy can create disturbances all night leading to complaints from residents, leading to planning authorities clamping down on businesses and therefore the very vitality of the town centre that you are trying to promote.
Cheek by jowl living of residential in vibrant town centres favours residents as they get the vote in the local election!

User: Ms barbara weiss

1. London's many and very varied town centres must not continue to be viewed as windfall opportunities/ cash cows waiting to be exploited in order to replenish the coffers of too many cash-strapped Boroughs. These communities have their own identities, their own history and character and if they are going to be regenerated and upgraded in order to accommodate some of the badly needed housing that London needs to build, then this should be done with the utmost sensitivity to the existing character. Local design-led plans must be produced before planning is granted to anything more than infill sites, and local residents opinions and priorities need to be observed. These decisions will have consequences for decades to come, and cannot be taken lightly. The choice of materials, volume, street level treatment are all extremely important and should be reviewed by Design Revie Panels and codified in local Design Guides.
2. Particular care should be given to surrounding Conservation Areas and the impact that new development will have on them - particularly views, adjacencies, over-shadowing, loss of light etc

User: McCarthy and Stone Retirement Lifestyles Ltd.

SD6 (78)-Town Centre

We strongly support initiatives which improve mobility, infrastructure and accessibility for older people.

Parts D of the policy notes the suitability of these areas for older people's accommodation but this also needs be considered in conjunction with the appropriateness of adjacent uses. This would really be demonstrated by Part F which discusses the need for varieties of uses within the town centre.

In terms of the use and legibility of town centres, Part H is to be welcomed but needs to be holistic. Furthermore, there also needs to be a system of maintenance for these elements.

We support this policy.

User:	The Federation of City Farms and Community Gardens

Town centres should also provide space for London's non-human residents. Developments should seek to increase biodiversity, and retain mature trees. Green infrastructure should be seen as a key part of the attractiveness of town centres.

User: Aviva Investors

Aviva Investors is a longstanding stakeholder and investor in the Royal Borough of Kingston upon Thames. It owns and operates the Bentall Centre and its associated multi-storey car parks, the Seven Kings car park and a collection of other smaller retail properties in the Kingston town centre.

Planning policy is very important to Aviva Investors as it can provide greater certainty in the planning and implementation of future investment.

Aviva Investors support the continued allocation of Kingston as a Metropolitan Town Centre in the draft Plan. As set out in Annex 1 (Town Centre Network) Metropolitan Centres *"serve wide catchments which can extend over several boroughs and into parts of the Wider South East. Typically they contain at least 100,000 sq m of retail, leisure and service floorspace with a significant proportion of high-order comparison goods relative to convenience goods. These centres generally have very good accessibility and significant employment, service and leisure functions. Many have important clusters of civic, public and historic buildings".*

Aviva Investors support Policy SD6, in particular: part (A) and the criteria to promote and enhance town centres and their vitality and viability; part (C) which promotes the potential for new housing within and on the edge of town centres to be realised through higher-density mixed-use or residential development; and part (F), which seeks to promote the management of vibrant daytime, evening and night-time activities to enhance town centre vitality and viability.

Aviva Investors support recognition in the draft Plan at paragraph 2.6.2 that to continue to thrive, town centres will need to evolve and diversify in response to current and future trends, technology advances, consumer behaviours, and the development of the 24-hour city. The acknowledgement that *"This need for adaptation and diversification, together with their good public transport accessibility, makes many town centre appropriate locations for residential-led and mixed-use high-density development"* is welcomed.

The Bentall Centre in Kingston is a very important provider of goods and services to the residents of the Borough and further afield. It employs over 2000 staff, supports a range of jobs and is a very important generator of wealth in the local economy. In order to maintain and enhance its existing role in the future, Aviva Investors must continue to invest in the shopping centre so that it remains competitive in the face of internet shopping and other town centres.

User: London Borough of Hammersmith and Fulham

H&F object to the rather ambiguous reference to higher density development being specifically encouraged in town centre locations (bullet C). London's town centres vary in their characteristics and many have heritage assets, conservation areas and other sensitivities such as proximity to the river Thames and protected views. This is certainly the case in H&F. On this basis such a blanket approach is un-helpful and the emphasis should be on optimising development sites rather than the emphasis being on seeking higher density development. Particularly as there is no explanation of what higher density is. Surely it varies depending on the make-up of particular centres. This lack of clarity is a concern in town centres that already have high density development as the London Plan is essentially promoting even higher/taller developments.

We recommend that bullet point C is reworded.

User: London Borough of Hammersmith and Fulham

H&F support the acknowledgement that town centres need to be flexible and adaptable to future trends and technologies. Whilst this is difficult to quantify and predict in retail studies, it is something that needs to be considered. The supporting text to this policy is however disproportionately weighted in favour of future trends rather than providing explanation for other aspects of the policy.

H&F support the reference to a diverse offer in smaller centres whilst protecting a core of retail. This is the approach that H&F have taken in its local centre policies. It is important however that such diversification is proportionate to the size of the ‘smaller centre’. In more isolated, small centres such as neighbourhood centres, the retail element may be the only accessible/walkable retail for certain residents and an over concentration of non-retail in such locations could lead to a lack of amenities for elderly or disabled residents.

We recommend that the GLA address the balance in the supporting text. They should also introduce a reference to the importance of neighbourhood centres in providing accessible retail.

User:	Alliance for Childhood

We propose adding the following wording in bold:

H: The delivery of a barrier-free and inclusive town centre environment that meets the needs of all Londoners, including disabled and older Londoners, **children and young people** and families with young children, should be provided. This may include Shopmobility schemes, the provision of suitably designed crossing points, dropped kerbs and tactile paving, **informal play**, seating and public toilets.

Children like to stop and play in informal spaces and this should be highlighted and included in the delivery of inclusive town centres.

User: Home Builders Federation

Policy SD6: Town Centres

The policy is unsound because many of the objectives are ineffective because they incompatible. This will discourage town centre redevelopment. This will have an adverse impact on housing supply in London.

We welcome the recognition that there is significant potential for London's town centres to generate new housing. However, we are concerned that the support to be given to the promotion of night time activities in in Part F of the policy, and for night time deliveries (which the Mayor's Transport Strategy encourages) in conjunction with the Agent for Change proposals, will actually make residential schemes less attractive. These objectives are not really compatible. Accordingly, this will have an impact on the contribution that town centre schemes can have on London's housing supply, despite what paragraph 2.6.2 envisages.

It is important that the London LPAs are allowed to apply the policy flexibly. They will be best placed to decide if some of the objectives in Policy SD6 should be abandoned in the interest of maintaining housing delivery.

To this end, the policy should be re-worded to read:

"A When planning town centre development proposals, and when considering applications, the local planning authority should endeavour to achieve the following objectives…".

We note and support the recognition in Part D of the suitability of town centres for the provision of older people’s accommodation. However, some consideration will need to be given to the appropriateness of adjacent uses, such as those encourage by the Employment policies in chapter 6. Mixed use industrial and residential would not really be appropriate for older persons housing, as we have discussed above. This would really be demonstrated by the London local planning authorities through Part F which discusses the need for varieties of uses within the town centre.

User: Royal Borough of Kensington and Chelsea

2.4 Policy SD6 Town centres

The Council supports the continued support for management of town centres. The policy recognises the need for an evolving town centre which promotes a night time economy, but this needs to be balanced against the need to ensure the retail character of our town centres is not compromised, and acknowledge that not all centres are suited to this type of use due to the close proximity of residential accommodation, which is often the case in this borough.

User: London Borough of Islington

Draft London Plan Policy

Policy SD6 – Town Centres

Islington Response

The Council is supportive of higher density mixed-use development in Town Centres (and in edge of centre locations where sequentially justified) provided it supports the continued function and contributes positively to the vitality and viability of such centres, particularly designated frontages and/or primary shopping areas. SD6 should be reworded to prioritise Town Centre sites for mixed-use development first, then edge-of-centre where sequentially justified. Islington consider that any residential element of mixed-use town centre development should only be permitted on upper floors. We do not agree with SD6(C) which suggests that residential only schemes may be appropriate in Town Centres outside existing frontages. We consider that residential only schemes would be a wasted opportunity to provide commercial space in inherently commercial areas, and believe that they should only be considered outside retail designations, both Town Centres and local designations.

Para 2.6.2 correctly recognises the need for town centres to evolve in the face of changing circumstances but this does not necessarily mean that residential should be prioritised in place of commercial. The need for diversification of town centres relates more to promoting a wider mix of commercial uses, particularly leisure. Islington's own evidence supports such commercial diversification.

SD6(D) can be read as prioritising certain specialist housing types over conventional residential. There is no reason why these typologies are any more suitable in town centre locations, and Part D may have the effect of incentivising these typologies which have their own inherent issues, particularly regarding appropriate affordable housing tenures. We have provided comments on these typologies in the housing section below.

SD6(E) supports the loss of surplus office space in Town Centres, however surplus is not defined. A definition which places a strong emphasis on robust information is necessary in order to avoid spaces being lost unnecessarily. The London Plan should defer to any borough thresholds, particularly related to marketing and vacancy requirements.

SD6(G) should have a more explicit ‘dispersal’ approach which looks to locate new visitor accommodation in well-connected outer London locations instead of inner London locations which have historically delivered the vast majority of such floorspace.

Policy SD6 should reflect the terminology of the NPPF and refer to Primary Shopping Areas, rather than (or in addition to) Primary and Secondary Frontages.

The draft London Plan does not define edge of centre. We suggest adopting the definition in the NPPF and that this should be repeated in the glossary of the London Plan.

User:	Telford Homes Plc

Telford Homes support housing led intensification within Town Centres. There are undoubtedly locations for mixed use schemes with commercial or retail uses on the lower floors. Often, retail and commercial uses involve particular servicing and parking arrangements, which can take up considerable ground floor space. It is considered that the London Plan should recognise this and encourage the dual use of back of house areas for both the residential and non-residential use.

User: Kew Society

Policy SD6 Town centres

The policies for building housing within and on the edges of town centres are very prescriptive. It seems that Boroughs have not been allowed to define these areas. The area of 800 metres from the edge of a town centre or train or tube station covers a very large area in any London Borough. It is in these areas that the Plan states that new housing should be realised through higher density mixed use or residential development. This could adversely affect the special characteristics of the Kew area and the World Heritage Site of the Royal Botanic Gardens, Kew. More flexibility should be incorporated in the London Plan to allow Boroughs to identify the best approach to growth in their area which they will know in detail best. Protection of valued local character should be a prime consideration so that development is undertaken in a way that preserves what is most valued by those who live and work in the area, both now and for future generations.

Policy SD6 D posits the particular suitability of town centres for smaller households (build to rent, old people's housing and student accommodation). One and two bedroom flats are suggested as a priority. There is a danger that this policy will create a less mixed community with a form of ghetto/enclave for young and old, leaving out families. In a town centre area, in particular, there should be an inclusive and diverse range of young, old and families planned for in order to sustain and encourage a centre which is lively throughout week days, evenings and weekends. Without this there is a risk of catering for short term need and so detracting from rather than revitalising town centres.

Policy SD6 E supports redevelopment of surplus office space to other uses including housing, while taking into account the impact of office to residential change of use under permitted development rights. This must be very carefully applied as in some areas like Richmond Borough there has been substantial loss of office and retail space under those permitted development rights. Article 4 Directions are helpful to protect existing space where applicable but where the Plan policies emphasise provision of housing in town centre areas, then pressure to prioritise such housing (and especially where this provides current greater return for developers than commercial use/development) could override

consideration of commercial need. Retention of commercial space also promotes employment. Once housing takes the place of commercial space, that commercial space is gone. Building of tall developments on top of commercial space, which this policy could promote, must also be considered very carefully (see our comments on tall buildings under Policy D8 below).

User:	Kew Society

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User:	Galliard Homes

Galliard supports Policy SD6 – Town Centres, in particular part C, where the Plan promotes `… new housing within and on the edges of town centres through higher-density mixed-use or residential development…'.

In supporting Policy SD6, Galliard is concerned that Policy SD8 – Town Centres: development principles and Development Plan Document does not encourage or promote residential uses as part of an authority's Local Plan making process. The Plan in one policy supports the need for residential in town centres, but then doesn't promote it in Policy SD8 itself. This doesn't feel properly considered, as residential should at least be listed as an appropriate Town Centre use in the Policy.

User:	City of London Corporation

The Mayor should clarify that opportunities to deliver additional housing through the redevelopment and intensification of town centres within the City of London are limited. The priority (in line with policies SD4 and SD5) should be on the delivery of commercial development to sustain the strategically important role of the CAZ.

User:	London Borough of Barnet

Support town centres first approach. However, plan needs to acknowledge putting new development into established centres will be challenging. Impact of resdiential on character of town centres.

User:	Space Syntax Limited

Vitality and potential of town centres interact with spatial connectivity, transport access, demographics and land use mix, which are constantly changing through developments. How is the GLA intending to reflect such dynamism in its Town Centre plan (Annex 1)?

User:	West Chiswick and Gunnersbury Society

Policies SD6 and SD8 We strongly agree with this section of TKS comments, especially that:

More flexibility should be incorporated in the London Plan to allow Boroughs to identify the best approach to growth in their area which they will know in detail best. Protection of valued local character should be a prime consideration so that development is undertaken in a way that preserves what is most valued by those who live and work in the area, both now and for future generations.

User: London Assembly Planning Committee

3.26 We are concerned that Policy SD6 part I on social infrastructure is insufficient to ensure both adequate and accessible provision of social infrastructure in London's town centres, which is needed in light of the intensification of housing development in town centres.
Recommendations – social infrastructure Policy SD6 should state that "the provision of social infrastructure should be enhanced, particularly where it is necessary to support identified need from town centre and local residents. Facilities should be located in places that are easily accessible to all users, taking into account accessibility by public transport, walking and cycling (Policy S1 Developing London's social infrastructure) and accessibility to meet the needs of all Londoners (Policy D3 Inclusive design). Facilities should also be located in places that maximise surrounding town centres uses". Policy SD6 also makes no reference to the engagement of local communities and stakeholders in the provision of social infrastructure. Policy SD6 should therefore be further amended to: "Facilities should also be located in places that maximise surrounding town centres uses. Local residents and stakeholders should be engaged with on plans for new social infrastructure in town centres".
3.27 In the National Planning Policy Framework (NPPF) it is unclear how far social infrastructure is an appropriate town centre use. Paragraph 23 states that Local Plans 'should allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres'13. However, the glossary in the NPPF guidance14 does not define social infrastructure as a type of town centre use.
3.28 Policy SD6 part D which argues that town centres are particularly suitable for smaller households, renters, older people and students, needs to be connected more strongly to policies on social infrastructure. These new uses and intensified residential development are likely to increase demand for social infrastructure.
3.29 If residential development is to be intensified in town centres, there needs to be appropriate social infrastructure to support these new communities. As recognised in the Plan itself "Social infrastructure plays an important role in developing strong and inclusive communities."15
3.30 Using the sequential test in the NPPF, main town centre uses such as retail may be prioritised above the provision of social infrastructure. This approach takes precedence over the current 'enhancement' of social infrastructure in town centres in Policy SD6 part I meaning that social infrastructure mayinstead be forced onto sites away from the town centre and the Plan may not achieve town centres that are the "strong, resilient, accessible, inclusive and viable hubs for a diverse range of uses" it aspires.

User:	London Waste and Recycling Board (LWARB)

1. We would suggest that policy SD6 - Town Centres, point G includes the need for enhancement of tourist infrastructure to include appropriate waste and recycling facilities which will be important to support increases in tourist usage of sites, and to avoid littering and reduction in recycling rates.

User: Newham Union of Tenants

Policies SD6, Town Centres, SD7 Town Centre Network, SD8 Town Centres, development principles and DPDs , SD9 Town Centre Partnerships and implementation

We have concerns about such a large amount of policy being focus on Town Centres, especially when increasing amounts of shopping is being done online.

Our concerns are the predominance of global stores and cafes; the viability of so many town centres being in close proximity to others, loss of local character and loss of shops, services, local markets and amenities that meet local needs and which are more likely provide employment to local people.

User:	Waterloo Community Development Group

Policy SD6 commentary 2.6.2 town centres are not appropriate for ‘resident-led’ development – this approach will lead to disaster on many town centre sites which financially return far less than other town centre uses. Mixed-use development is fine, but don’t encourage resident-led! We have lost many employment and retail sites in the Waterloo Opportunity Area and VNEB because of the over-riding impact of financial return of resident-led.

User:	University of the Arts London

The town centre policy should include the need to stimulate day-time creative uses, including by the creative industries, as well as to stimulate the night-time creative economy. Day-time uses typically require less subsidy, provide effective support to micro-SMEs, are space intensive, and should be specifically encouraged under planning policy.

User: British Land

Town Centres (Policy SD6)

17. British Land welcome Policy SD6 which supports town centres as locations for mixed-use or housing-led intensification and higher density renewal. Also welcomed is the reference to the particular suitability of town centres for smaller households, Build to Rent, older people's housing and student accommodation.

18. The Canada Water Masterplan seeks to deliver a variety of housing choice by providing a range of housing types, tenures, price points and sizes which could potentially include Build to Rent, assisted living and student accommodation.

19. Policy SD6 looks to align town centre policies with national (and local) policy meaning that the 'scale' test would no longer exist. The London Plan also reiterates the requirement for town centres to have clearly defined boundaries. These changes are welcomed to ensure a consistent approach across the different tiers of planning policy.

20. The policy identifies that Development Plans should identify centres that have particular scope to accommodate new commercial development and higher density housing, having regard to the growth potential indicators referred to above. Criteria to consider in assessing the potential for intensification include:

- demand assessments for retail, office and other uses;
- public transport accessibility/capacity; and
- planned or potential transport improvements.

21. Liverpool Street and Broadgate are well positioned in relation to the above criteria to support higher density commercial and retail development in line with the 'High Growth' classification.

22. Woolwich is identified as having capacity to deliver 5,000 new homes and 2,500 new jobs. We therefore fully support the Plan's proposals to reclassify Woolwich Town Centre in the future as a Metropolitan town centre to help fulfil this growth potential.

User:	Greystar Europe Holdings Ltd

The provision of BTR and student accommodation in town centres (Policy SD6 ‘Town Centres’) is welcomed. As with Opportunity Areas, Greystar’s future pipeline of development is focused in such well-connected town centres for the reasons set out in the policy;

User:	Deliveroo

In partnering with us, restaurants are exposed to new customers and new markets, enabling them to scale their operations, which in turn creates jobs and has other positive, knock-on benefits to the wider economy. Restaurants who partner with Deliveroo see their revenues increase by up to 30%. Deliveroo has helped create 7,200 restaurant jobs across the UK and in 2017 alone increased revenue of the restaurant sector by £460 million. At a time when high streets are facing challenges, this can be the difference between a restaurant closing,surviving and thriving. **We therefore welcome the support for high streets in Policy SD6(B).**

User: London Tenants Federation

2.4.6 Policies SD6, Town Centres, SD7 Town Centre Network, SD8 Town Centres, development principles and DPDs , SD9 Town Centre Partnerships and implementation

We have concerns about such a large amount of policy being focus on Town Centres, especially when increasing amounts of shopping is being done online. 2.4.7 Our concerns are particularly the predominance of global stores and cafes; the viability of so many town centres being in close proximity to others, loss of local character and loss of shops, services, local markets and amenities that meet local needs and which are more likely provide employment to local people.

User:	London Borough of Hounslow
LB Hounslow supports this policy	

User:	London Borough of Haringey

The Council supports the enhancement of the vitality and viability of town centres. The Policy should be strengthened further by ensuring the Mayor uses his planning powers to direct strategic retail development proposals to locate in the existing higher order centres. In the past we have seen new metropolitan centres emerge from district centres, to the detriment of existing metropolitan centres that are struggling to maintain their strategic role and function, and require such investment to rejuvenate and thrive.

User:	London Borough of Haringey

Guidance on how this should be achieved at a London wide level should be detailed by the Mayor, to ensure a comprehensive approach in ensuring town centres do not decline

User:	London Borough of Haringey

The Council supports the principle of housing in town centres and has local policies to support this. Residential only schemes within the town centre are of concern however given Local Evidence and Plans to encourage mixed use developments to re-vitalise the Borough’s centres.

User:	London Borough of Haringey

The Council supports the increase in housing and the managed re-development of existing office space. However, this should not be at the risk to the viability and vitality of the Town Centre. In order for LPA’s to make a planning decision on the cumulative impact of Prior Approval, a threshold or guidance should be provided by the Mayor to justify planning decisions i.e. at what point (% losses, vacancy rates etc) would the impact of prior approval tip the balance towards retaining office space?

User:	London Borough of Haringey

Ground floor residential is a sign that a parade or centre is in decline, and cannot support retail / employment floorspace. Residential use in these locations would not be reversible and would result in inactive frontages, the loss of vibrancy and vitality within centres and poor quality residential. Policy should allow for developments to be considered more in line with local evidence.

User:	London Cycling Campaign

Add item K:

High quality cycle infrastructure to key destinations in town centres, and between proximal town centres should be provided

User: London Cycling Campaign

Add item H:

All town centres, including International, Metropolitan, Major and District, must provide high quality access by walking and cycling to reduce motor traffic dominance

We note the comment on p85 which states that town centres dominated by retail parks and large format stores are “heavily reliant on the car.” Provision of high grade walking and cycling routes as well as better public transport reduces car dependency. Stratford City, with good public transport and some provision for cycling, is less reliant on cars than anticipated and the Westfield shopping centre located there is in the process of converting car parking space to shops.

User: London Borough of Brent

The Council places a significant importance on the role that Brent town centres have in supporting the character, sense of place and functioning of meeting residents', businesses and visitor needs. As such it supports the majority of this policy and clear importance and priority that it places on town centres as an essential part of the effectiveness of London. It does however have concerns about criterion C and the reference to 'higher-density'. It begs the question of higher than what and experience to date indicates that often it promotes developers to pursue tall buildings in these locations that are often out of context with the existing character of the area. The Council would prefer reference to making best use of land taking account of the factors identified in the rest of the policy and that of policy D1 related to properly understanding and responding to existing character and context.

In addition the Council would like to see greater flexibility with regards to secondary frontage particularly where planned or market contraction of the centre is occurring to ensure that unviable ground floor non-residential space which will potentially be subject to long periods of vacancy is not required/provided.

Amend text to:

c) "The potential for new housing within and on the edges of town centres should be realised through higher-density mixed-use or residential development that makes the best use of land, capitalising on the availability of services within walking and cycling distance, and their current and future accessibility by public transport. (see Policy D1 London's Form and Characteristics). Residential-only schemes in town centres may be appropriate outside of primary and secondary shopping frontages, or within peripheral areas of secondary frontage where it can be demonstrated that they would not undermine local character and the diverse range of uses required to make a town centre vibrant and viable……"

User:	London Borough of Lewisham

We support SD6 as it is aligned with our aspirations for intensifying Lewisham and regenerating Catford town centre via mixed-use developments. We are pleased that SD6 acknowledges town centres as a good location for older person’s housing as well as student accommodation. We are keen to maintain vitality in our town centres and believe that by adding a well-planned residential element can stimulate vitality and vibrancy whilst helping to foster an inclusive night-time economy that will ensure our Borough does not become a dormitory suburb of central London.

User:	Save Swiss Cottage

Policies SD6, Town Centres, SD7 Town Centre Network, SD8 Town Centres, development principles and DPDs , SD9 Town Centre Partnerships and implementation
We have concerns about such a large amount of policy being focus on Town Centres, especially when increasing amounts of shopping is being done online.
Our concerns are the predominance of global stores and cafes; the viability of so many town centres being in close proximity to others, loss of local character and loss of shops, services, local markets and amenities that meet local needs and which are more likely provide employment to local people.

User:	London Borough of Bromley

The continued focus on town centres for multiple uses is supported however it is important to recognise that not all town centres can accommodate higher density development without irrevocably changing their character. Boroughs should be able to determine which town centres are suitable for higher density development rather than there being a blanket assumption.

User:	Be Living Ltd

Policy SD6 – Town Centres We support mixed-use and housing-led intensification in town centre locations but would highlight a potential conflict with the Agent-for-Change principles contained in the draft Plan, in particular Policy D12 (D) which could have the effect of curtailing intensification.

User:	London Borough of Tower Hamlets

The focus of the town centre policies appear sound, although we have concerns regarding residential-only schemes within town centres outside of primary and secondary frontages as this could impact neighbourhood centres especially.

Part C should be caveated to make it clear that high density mixed-use development will be encouraged/supported in principle, subject to other considerations, such as the impact upon the character and historical significance of a location. Otherwise, there is a concern that such a policy will lead to a spate of ad hoc developments of varying scales and heights, bearing in mind that London’s town centres are often located in sensitive areas. We would also consider there a need to prepare guidance to ensure that the design of new development in town centres is carefully coordinated from the outset, in the interests of good growth and place shaping.

User: Royal Borough of Kingston

3.1 The aim of Policy GG5 (B), to share more equitably the economic success of London is supported. However, RBK does not consider this ambition to be expressed in other sections of the document and it is noted that the IIA rejects the option of a polycentric city. Instead the London Plan seeks to strengthen the economic offer of central parts of London without looking to increase employment capacity across London alongside significant increases in housing. Without explicit London Plan policy support, RBK will struggle to deliver new local employment floorspace to counterbalance the housing growth, increasing pressure on transport networks, reducing quality of life and failing to meet the needs of local businesses and potential businesses. The equalities impact of this approach is also poorly addressed. This approach will mean that outer London areas increasingly operate as dormitories by providing the workforce for a very centralised employment offer, but not providing the necessary local capacity for enterprise and employment. RBK suggests amendments to the approach to enable District town centres to secure new office and employment floorspace for a local/borough level catchment, rather than just small office protections. For larger town centres such as Kingston, this should be growth to support a sub-regional catchment, and should not be constrained by delivery of Crossrail 2.

3.2 RBK is also very concerned about protection of identified industrial locations. For successful areas such as those in Kingston, the policy should continue to protect the total amount of land, not merely *capacity* , to support future intensification and therefore *increased* future employment and economic benefits. This again would support local employment and enterprise alongside housing growth, to create a more sustainable city.

User:	Royal Borough of Kingston

In general, RBK supports the policies on Town Centres (SD6-SD9) identified in the chapter and agrees with their classification. As noted in relation to the policies within chapter 6, RBK is concerned about the loss of employment and economic land to other uses, such as housing, and consider that the policies undermine the aim of growing the borough's economic offer. RBK suggests the approach is amended to identify the potential of town centres to provide housing, whilst also recognising that individual boroughs may take a more restrictive approach in order to protect and enhance a Town Centre's economic function.

User: HFFTRA

Policies SD6, Town Centres, SD7 Town Centre Network, SD8 Town Centres, development principles and DPDs , SD9 Town Centre Partnerships and

implementation

We have concerns about such a large amount of policy being focus on Town Centres, especially when increasing amounts of shopping is being done online.

Our concerns are the predominance of global stores and cafes; the viability of so many town centres being in close proximity to others, loss of local character and loss of shops, services, local markets and amenities that meet local needs and which are more likely provide employment to local people.

User:	London Borough of Hillingdon

The Council places significant importance on the role that Hillingdon's town centres have in supporting the character of the borough and meeting the needs of residents’, businesses and visitors. The priority given to town centres is therefore supported.

The reference to ‘higher-density’ in criterion C raises a particular concern. It begs the question of what constitutes higher density and often encourages tall buildings in locations that are out of context with the existing character of the area. High density residential development within town centres must only be allowed if it complements the character, role and function of the local centre.

The Council would prefer a reference to making best use of land, taking account of the factors identified in the rest of the policy and policy D1, relating to a proper understanding and responding to existing character and context.

User: Hammersmith and Fulham Disability Forum

15. Policy SD6: Town Centres

Para H: We welcome this policy and consider it to be a golden thread that should be repeated throughout all New London Plan Policies by changing the words as appropriate inside the square brackets below:

“The delivery of a barrier-free and inclusive ***[town centre environment]*** that meets the needs of all Londoners, including disabled and older Londoners and families with young children, should be provided”.

16. If the New London Plan is not explicit about requiring barrier free and inclusive development throughout the Plan that meets the needs of all Londoners, including disabled and older Londoners and families with young children then the New London Plan will not achieve accessible and inclusive developments or environments that meet the Equality Act 2010.

User:	London Borough of Hackney

The overarching approach set out in this policy whereby London’s town centres should be supported as resilient, inclusive and viable hubs for a range of town centre and commercial uses and housing-led intensification is supported by Hackney and is in line with the approach set out in LP33.

Adaption and restructuring of town centres to respond to multi-channel shopping, changes in technology consumer behaviour, management and servicing.

User: AECOM

Our thoughts:

The London plan presents a rethinking of London's centres hierarchy. The CAZ is at saturation point, whereby London's secondary centres (the fringe and beyond) are **evolving with the delivery of new transport infrastructure** (e.g. Crossrail 1), and increased densification along strategic transport corridors. The role of these centres is shifting from back office space and retail, to **key centres** with growing economic (workspace) and entertainment functions, that were previously only available in the CAZ. This is **supporting changing workplace practices** and commuter flows.

By increasing density in the suburbs and maximising opportunities around tube and rail stations across suburban London, this could create revitalised centres with homes, workplaces and community amenities in close proximity to jobs.

London's workforce is increasingly **prioritising flexibility**. This has led to a changing role and function of the workplace, with people able to work from home, the office or coffee shop and with the rise of the part-time Londoner. **Advances in technology**, from wireless networks to mobile devices, are providing greater freedom to work anywhere.

London's ongoing centres hierarchy shift reflects changing priorities. The London Plan is placing increased importance on office and retail **growth outside the CAZ** in Stratford and Old Oak Common. Both centres are well connected and have the potential to function in a similar manner. AECOM believe that other centres including Brent Cross, Woolwich and Croydon will also begin to play a greater role, that will shift the priority from the CAZ to other accessible locations that offer similar needs to an agile workforce.

How Can AECOM Help?

AECOM provides expertise in research, advice and implementation in evolving workplace practices through our Strategy+ team in London. We have worked with private and public sector clients in delivering unique and flexible workspaces that accommodate changing needs of employees.

AECOM have extensive experience working with TfL assessing major infrastructure impacts on housing and employment across the wider region. In addition, AECOM is advising TfL on implications of increased density alongside transport solutions in developing secondary town

centres.

User: Westminster City Council

In Westminster, there are designated town centres that exist within the CAZ. It should therefore be made clear that this policy refers to town centres beyond the CAZ, so it is clear that it does not cut across the CAZ policies (particularly SD5).

Whilst the suitability of town centres for smaller households, Build to Rent, older people's housing and student accommodation (criterion D) is recognised, it should be clarified that this does not preclude the provision of some family sized housing in town centre locations to meet local needs – see response to draft policy H12.

Criterion E is unnecessary in terms of supporting conversion of surplus office space to residential given permitted development rights, and fails to recognise the benefits that developments other than housing can bring to town centres; such as retail, leisure or mixed use schemes. In the absence of any clarity that the policy only applies to town centres outside of the CAZ, it also conflicts with the approach of seeking to protect offices, as set out in draft policy SD5(F).

User: London Borough of Southwark

The council supports the role of town centres as hubs for a range of activities, including opportunities for higher density mixed-use development including a range of housing types, and providing a focus of commercial activity outside the CAZ.

Demand for retail floorspace is projected to grow in Southwark particularly concentrated in town centres in the north and centre of the borough and to serve significant new housing growth.

The council considers that residential-only schemes outside of primary and secondary frontages may be appropriate in certain instances. This should be set within the context of replacing any retail uses or services of value to the general public that would otherwise be lost in a residential-only scheme, unless it can be demonstrated that these uses would be unsuitable or unviable (Part C).

User:	London Borough of Redbridge

We strongly support policy SD6. Digital infrastructure should be included in the policy recognising the importance of such infrastructure in attracting investment to town centres. We would also like to see more of an emphasis on the need for mixed use town centres including affordable workspace.

User:	London Borough of Enfield

Policy SD6 aims to promote and enhance London’s varied town centres and their vitality and viability. There should be mention of using green and digital infrastructure to enhance the safety and security of town centres. Greater commitment should be given to
a renaissance of all London town centres and high streets and their changing functions including the role they play in delivering new homes.

User:	London Borough of Harrow

The Council supports the enhancement of the vitality and viability of town centres, however as suggested under A(2), a significant amount of commercial floor space has already been lost within the town centre (Table 6.2 requires Harrow to retain floor space — and indeed Local Evidence supports this). This does not give account for the significant loss of commercial floor space through the prior approval. Harrow would be more cautious about encouraging housing led schemes within the town centre without robust justification about the on-going success of the role of the town centre, and London Plan policy should allow for developments to be considered more in line with local evidence.

User:	London Borough of Harrow

The Council supports the enhancement of the vitality and viability of town centres, however as suggested under A(2), a significant amount of commercial floor space has already been lost within the town centre (Table 6.2 requires Harrow to retain floor space — and indeed Local Evidence supports this). This does not give account for the significant loss of commercial floor space through the prior approval.

Harrow would be more cautious about encouraging housing led schemes within the town centre without robust justification about the on-going success of the role of the town centre, and London Plan policy should allow for developments to be considered more in line with local evidence.

User:	London Borough of Harrow

Guidance on how this should be achieved at a London wide level should be detailed by the Mayor, to ensure a holistic approach in ensuring town centres do not fall into decay.

User: London Borough of Wandsworth

The overall policy is generally supported and the criteria which acknowledge the importance of town centre adaptation to support changes in consumer b. However, the London Plan now recognises Southfields as a ‘District Centre’ along with Balham and Earlsfield, which were both identified in the previous adopted London Plan. The Council objects to Southfields being included as ‘District Centre’ as this classification is confusing when applied to the Local centre hierarchy approach. As currently worded there is an implication that District Centres are town centres, which they are not. The Council designates its centres as part of the Local Plan process and the scale of development proposals should reflect the position of the Southfields centre as a Local Centre in the Local Plan town centre hierarchy. This could be interpreted by developers as suitable for largescale development serving a wider catchment and encourage inappropriate development proposals. The Council designates its centres as part of the Local Plan process and the scale of development proposals should reflect the position of the Southfields centre as a Local Centre in the Local Plan town centre hierarchy, and the London Plan wording should help avoid any misinterpretation of the role and function of the District Centres listed there.

User:	London Borough of Harrow

The Council supports the principle of housing in town centres and has local policies to support this. Residential only schemes within the town centre are of concern, given the amount of office to residential conversions undertaken under Prior Approval. In Harrow the losses have reached a point where new office development (of modest scale) is becoming competitive against residential with respect to land values/viability. This policy should allow for proposed residential only developments to be considered more in line with local evidence.

User:	London Borough of Harrow

The Council supports the increase in housing and the managed re-development of existing office space. However, this should not be at the risk to the viability and vitality of the Town Centre. In order for LPA’s to make a planning decision on the cumulative impact of Prior Approval, a threshold or guidance should be : provided by the Mayor to justify planning decisions i.e. at what point (% losses, vacancy rates etc) would the impact of prior approval tip the balance towards retaining office space?

User:	London Borough of Harrow

Ground floor residential is a key indicator that a parade or centre is in decay, and cannot support retail/employment floorspace. Residential use in these locations would not be reversible and would result in inactive frontages, the loss of vibrancy and vitality within centres and poor quality residential. Policy should allow for developments to be considered more in line with local evidence.

User:	London Borough of Richmond Upon Thames

The overall policy is generally supported. There should be greater recognition that where there remains demand for additional retail floorspace, there are limited sites available and centres are generally buoyant, that policies should continue to encourage an appropriate level of diversification for that borough there
is not a one size fits all solution across the
capital. Equally, where boroughs which do not have surplus retail or office space, as is the case in Richmond, it should be acknowledged that conversion to residential will not be appropriate in all locations.

User: The Northbank BID

Chapter 2: Spatial Development Patterns
Policy SD 4, 5, 6

The Northbank is one of London's most central areas so supports investment in infrastructure that facilitates business operations and a growing economy. The London Plan recognises the diverse functions of central London and the many challenges. We would like to emphasise the challenges for the CAZ and the need to tackle them as a priority. This would benefit a high number of people due to the dense employment and high numbers of visitors.

Central London needs to attract new businesses with a thriving economy and as a healthy location for staff. Further investment is needed to deliver improvements to distribution, freight and servicing to support the needs of business and a strategic plan to deliver it.

Creative solutions are required to ensure that the necessary space is provided, and that more sustainable logistics functions are facilitated within the CAZ e.g. smaller spaces for micro consolidation can support new developments, off-street loading and unloading bays should be required.

Policy SD6 on Town Centres is welcome, although the Plan should better recognise the strategic importance of business-focused hubs and clusters.

User:	Royal Borough of Greenwich

We are pleased to note that the draft Plan aligns with our aspiration for Woolwich to be reclassified as a Metropolitan Town Centre in the future. We also support the requirement to realise the full potential of existing out of centre retail parks to deliver housing, and this is an approach that we’re already pursuing in Charlton Riverside. Overall, the approach to town centres in policies SD6 to SD9 is comprehensive and effective and we welcome this more holistic approach.

User: London Borough of Havering

Havering’s town centres are very important to local communities and the Council wants to support their vitality and viability. The overall aims of the policy are supported. The Council will expect to be able to identify how and where higher density developments are accommodated rather than there be a blanket assumption.

Havering is developing an Economic Development Strategy to identify how Havering’s town centres can be supported. Havering also undertakes regular town centre health checks.

Havering’s larger town centres already provide a range of functions including employment, leisure, education and culture, night-time economy, and through these functions, as well as the provision of transport infrastructure and a good range of retail and hospitality and should be in a good position to survive the changes in the retail sector.

The draft London Plan should recognise that the position with smaller town centres may be more challenging even with the additional growth that the Mayor proposes for them. The proposals suggested in the draft London Plan will require considerable resources which are not currently available within the local authority and are unlikely to be sufficient to support some of the smaller peripheral town centres.

User:	Marble Arch Partnership

We support the approach taken by Policies SD6 to SD8 although we question why the growth potential and the night time economy cluster have both been downgraded for our area that the plan recognises as the Edgware Road South centre. We have well over 100 eating out venues in our area, including a renowned concentration of restaurants offering a wide range of Arabic cuisines which attracts people from all over London and from overseas, particularly during the summer.

User: London Borough of Newham

LBN are generally supportive of the policy which is complementary to Newham's Draft Revised Local Plan.

The increased focus on night time, cultural and visitor economies beyond traditional Central London locations and the recognition of the important role social infrastructure can play in sustaining town centre vitality are particularly welcomed.

However, points A.2 and C. and the related paragraph 2.6.2 should be amended to clarify that high density housing will not be appropriate in all town centres/all edge of centre locations. A design-led, blanket approach is not supported. Intensification is not merely a matter of public transport/services accessibility and the ability of local setting to absorbed townscape changes. It should also be plan-led, following a strategy for good growth that reflects place vision, hierarchy and function. As the NPPF makes clear that new development should be plan-led, the current policy approach unnecessarily restricts local capacity to meet over-arching strategic objectives of strategically directing high density and tall buildings.

LBN also object to point D. The London Plan should not apply a blanket approach by expecting developments in town centres to cater distinctly to smaller households, Build to Rent, older people's housing and student accommodation. This is inconsistent with Policy GG4.C requiring creation of mixed and inclusive communities, by appearing to discriminate against provision of families in town centres for which a two-bed home would be insufficient. The London housing market is not homogenous and therefore housing mix is not a matter of strategic importance. As per the NPPF para 50, policies on housing mix should be plan-led and respond to local current and future needs identified through the evidence base. LBN's approach to housing mix responds to a broader spatial strategy for good growth and housing needs identified through the sub-regional SHMA 2016. Any provision needs to be balanced on a case by case basis against need to provide family housing and conventional housing more broadly, alongside specialist offer, in accordance with the Local Plan. The new London Plan is too prescriptive and policy unnecessarily restricts local capacity to meet locally identified housing need.

User: Berkeley Group

Policy SD6 Town centres

C The potential for new housing within and on the edges of town centres should be realised through higher-density mixed-use or residential development, **including tall buildings,** capitalising on the availability of services within walking and cycling distance, and their current and future accessibility by public transport. Residential-only schemes in town centres may be appropriate outside of primary and secondary shopping frontages where it can be demonstrated that they would not undermine local character and the diverse range of uses required to make a town centre vibrant and viable.

User:	John Innes Society

We broadly support Policy SD6 (especially 1-4) but would like to see greater emphasis on the word **local identity in SD6 4** with the aim of avoiding so many town centres becoming standardized clones that could be anywhere, here or abroad.

User: London First

Policy SD6: Town Centres, SD7: Town Centre Network and SD9 Town Centres: local partnerships and implementation
We welcome the Plan's recognition of the important role of town centres as primary locations for commercial activity beyond the CAZ and as contributors to the local and London-wide economy. We also welcome recognition of the role that town centres can play in increasing housing delivery. The accessibility of town centres to amenities, such as retail, leisure, social, cultural and transport infrastructure, means that they are appropriate locations for higher-density development as recognised by part C of the policy. However, the policy should go further to identify that town centres are suitable locations for tall buildings.

We welcome the requirement in policy SD9 for each town centre to have its own strategy. However, we believe the Plan's policies and supporting text should go further to encourage boroughs to move away from local retail frontage policies that set minimum thresholds for A1 retail frontages (and therefore restrict non A1 retail or other town centre uses) within a shopping street. The Plan should contain policy guidance that encourages a wider scope of uses within town centres – such as leisure, food and drink, commercial, cultural and civic – that would maintain a vibrant high street. Whilst this is implied within the policy, it is not specifically stated.

User: Just Space

SD6 Town Centres

SD7 Town Centre Network

SD8 Town centres: development principles and Development Plan Documents

SD9 Town Centres: Local Partnerships and Implementation

In the current economic climate, high streets are facing threats. Retail habits are changing but other factors also present challenges too. However, 47% of businesses outside Central London are on a high street and 1.45 million employees work on or within 200 metres of a high street, and this number is growing. **Nearly 70 per cent of London's high streets** don't fall within a town centre boundary. This means that the majority of high streets have no formal policy designation and **are potentially vulnerable to the pressure to deliver housing through redevelopment[1]**.

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

The main evidence document, the ***2017 Town Centre Health Check Analysis*** report is based on very high level statistics and projections. It is based on particular assumptions (e.g. a few high level centres will prosper, most small centres will not), which don't reflect a sound and fine grained understanding of what happens on the ground, in terms of the dynamics of local businesses and organisations, how people live, shop, access education, health, other social infrastructure etc. Research from Suzanne Hall on super diverse high streets for example shows that Rye Lane in Peckham has more retail outlets, jobs and is more profitable than Westfield Stratford[2]. This also brings in strong evidence of the benefits of subdivision of units for a range of very diverse activities. Laura Vaughan's research on Adaptable Suburbs points out the essential

role of small centres and high streets in Outer London in providing sustainable growth.[3]

Another concern is that home-based work is not considered in either of the Town Centre, or Housing or Design policies. Research from Frances Hollis shows that 25% of the UK workforce is engaged in home based work at least one day a week. ‘The development of workhomes designed to accommodate the dual functions of dwelling and workplace has the potential to bring substantial social and economic benefit to home-based workers, to employers and to society at large.’[4]

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

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

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

We feel it is unsound that there are concerns raised by the IIA about the safeguarding of key social and community infrastructure in town

centres, that no provision is made in relation to this in the relevant policies, and that the impacts of this policy on the foundations of vital and lifetime neighbourhoods in London, especially for poorer communities, are declared to be unknown. It is our view these highly valued and socially important functions of town centres and high streets will be seriously affected by this policy as low value uses are displaced for high value uses, economic and cultural activities for unaffordable housing.

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

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

[2] https://www.architectsjournal.co.uk/news/tread-softly-for-you-tread-on-my-dreams/8687894.article

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

[4] http://www.theworkhome.com/knowledge-transfer-fellowship/

User:	London Borough of Bexley

Paragraph 2.6.2: The supporting text to **Policy SD6 Town centres** refers to ‘high-density’ development whereas the policy refers twice to ‘higher-density’ development. The supporting text should be changed to ‘higher’ in accordance with the policy as these terms are interpreted differently. There is also no definition of ‘high density’ in the supporting text.

User: Inclusion London

Policy SD6 Town centres

Pedestrianised town centres and Oxford Street

The lack of access for cars and buses will make pedestrianised areas such as Oxford Street and town centres totally inaccessible for people that can only walk short distances. Many Disabled people were not aware of the consultation on Oxford Street becoming pedestrianised so could not raise their concerns. In addition not all underground stations are not wheelchair accessible so this cuts down access as well.

User:	London Borough of Ealing

We note that Town Centres (Policies SD6-9) remain the primary locations for commercial activity in London. We welcome the strong ‘town centre first’ approach and the resistance to out of centre development of town centre uses. We also acknowledge and support the policy that many town centres have the potential to accommodate significant quantities of new housing through higher density mixed use or residential development. Encouragement of the use use of Article 4 Directions to remove PD rights for office to residential conversions, where appropriate and justified, is also supported.

User:	Federation of Small Businesses

FSB London would like to see more encouragement and financial help to attract independent and small businesses to town centres as they not only provide more local revenue - research shows that for every £1 spent with an SME there was an additional 63p benefit for the local economy compared with 40p in every £1 spent with a larger business - but also they are often key in providing face-to-face contact and local social interaction with their local community.

User:	Federation of Small Businesses
FSB London supports the principles behind this policy.	

User:	Federation of Small Businesses

Build to rent should be affordable and based on average London wages to stop the loss of key staff because of in affordable rents driving them away from London employment.

User:	Federation of Small Businesses
This policy must be rigorously tested as the question of residential v commercial starts to become a tug of war.	

User:	Federation of Small Businesses

London and Partners must also work closely with other parts of the UK by using London as a stepping stone to tourist destinations in key locations in the UK.

User:	Redington Frognal Neighbourhood Forum

SD6 Spatial Development, Town Centres. The wording in policy text box at A 2) (page 78) should again be strengthened to protect conservation areas heritage buildings.

SD6 A 2 “locations for mixed-use or housing-led intensification and higherdensity renewal, securing a high-quality environment and complementing local character and heritage assets preserving and enhancing heritage assets and complementing local character.”

SD6 A 4 The words local landmarks, open spaces, views and heritage assets to be added in policy text box at A 4) (page 78)

SD6 A 4 “the main focus for Londoners’ sense of place and local identity in the capital, based in local landmarks, open spaces, views, and heritage assets.”

User:	Redington Frognal Neighbourhood Forum

SD6 a new point K should be introduced to give greater recognition to London’s heritage.

SD6 K “The role of heritage assets in tourism, and in the local sense of place, should be recognised, and heritage assets preserved and enhanced as valuable components contributing to the Town Centre strategy.”

User:	Rosalind Readhead

POLICY 4.8.e I support the range of London’s markets, including street, farmers’ and, where relevant, strategic markets, complementing other measures to improve their management, enhance their offer and contribute to the vitality of town centres. This must be broadened to develop the relationship between Londoners and the local food growers outside London. Helping with picking and building cultural exchanges.This is important for food security, health and well being.

User: Revo

We fully support a town centre place making policy approach that is sustainable, connected and adaptable to the changing nature of the high street.

It is important the Plan recognises the changing role of town centres and the pressure that the rise of omnichannel retail has placed on their ability to function in their traditional retail-based format, therefore we are encouraged by the Plan's commitment to adapt, including innovative ways of retailing, accommodating new space where there is a demand, managing the transition of surplus retail space to other uses such as intensive mixed-use and residential, and supporting flexibility for temporary or 'meanwhile' uses of vacant properties.

We continue to support higher density and new homes above retail and commercial use, which in turn make footfall more resilient and offer services to those residents. We agree that town centres with new housing developments must be well-connected to public transport infrastructure and the local economy.

Policy provisions should give flexibility for local authorities to plan town centres to make best use of space and facilities, to create sustainable locations with active day and night time economies. As with the last 20 years, there has been significant change and it is clear that the next 20 years will bring further change to which our centres must be able to adapt.

Business rates, property taxes and overall occupancy costs are currently putting extreme pressure on the viability of physical retail unlike at any time previously, coupled with the challenge of online retail. The Mayor must consider how to best capture and deliver value to ensure we have successful high streets and town centres which we agree are vital social centres for communities. This must include new and innovative ways to ensure that retail, amenities, offices, leisure, entertainment, culture, tourism and hotel industries are supported and encouraged to remain / locate on the high street if our centres are to remain vibrant. We believe retail, hospitality and leisure are critical component of successful mixed-use developments, particularly in the experience economy in which we currently live.

The managed growth, and where necessary decline, and consideration of outdated Use Class Orders must also be considered to ensure innovative start-ups and hybrid businesses can thrive in the capital and to ensure vacancy rates remain as low as possible to create stronger, more resilient town centres.

Local authorities, communities and businesses remain at the heart of this process, and must work in concert, while Local Authorities in

particular should consider how public services can be used to help protect the vibrancy and footfall of key economic centres (e.g. health serves, community sports facilities, etc).

User:	London NHS Clinical Commissioning Group

Policy SD6 Town centres

The recognition of town centres as important locations for social infrastructure is supported recognising their contribution to the viability and vitality of centres, and accessibility for services.

User: British Property Federation

We support a town centre place making policy approach that is sustainable, connected and adaptable to the changing nature of the high street. The draft plan recognises the changing role of town centres and the pressure that online shopping has placed on their ability to function in their traditional shop-based format, therefore we are encouraged by the plan's commitment to adapt. The draft plan encourages adaption towards innovative ways of retailing, accommodating new space where there is a demand, managing the transition of surplus retail space to other uses such as intensive mixed-use, and ensuring that there is not a surfeit of empty space on the high street by supporting flexibility for temporary or 'meanwhile' uses of vacant properties. We endorse these policy initiatives.

We support residential development in town centres, including homes for smaller households, Build to Rent, older people's housing, and student accommodation, so as to adapt to the new dynamic of high streets. We would advise that new homes can for example be located above retail stores and commercial uses, to ensure that town centre footfall does not decline; residential use of empty spaces should also be considered as a suitable measure to ensure that town centres do not become blighted by declining occupancy. We are encouraged that the draft plan states that town centres with new housing developments should be well-connected through public transport infrastructure, cycling and walking; ensuring that town centre residential developments are well-connected is vital for the local economy[1]. These policy provisions should give flexibility for local authorities to plan town centres to make best use of space and facilities, to create sustainable locations with active day and night time economies. However, we acknowledge that there also needs to be a balance between housing and commercial use of land. Successful high streets and town centres are often seen as vital social centres for communities, meaning that retail, amenities, offices, leisure, entertainment, culture, tourism and hotel industries must be encouraged to remain/ locate on the high street if they are to be in good shape – a mix of uses, including new homes - is key.

High street primary and secondary areas may well need to be reduced back towards the core (of the town centre) to achieve a stronger and better managed town centre overall. This may require significant restructuring and therefore it is imperative that local authorities, communities and businesses remain at the heart of this process, to seek to ensure that each town centre is a thriving social hub of the local area.

[1] See response for GG5 Growing a Good Economy.

User: London Riverside BID

Policy SD4 – The Central Activities Zone

We welcome part M of this policy that requires capacity for industrial and logistics to be identified and protected. However, this policy should go further to require boroughs and stakeholders to identify the scope for publicly owned land to provide business space for last mile distribution/urban logistics, freight consolidation and other industrial and logistics uses. This may assist in addressing the issues around affordability of land.

User:	GLA Industrial BIDs Group

Policy SD6 – Town Centres

This policy should be amended to encourage the provision of new last mile delivery/urban logistics facilities on suitable sites within or near town centres.

User:	Business for London

Town centres. Town centres‘ role is changing. Policies need to change to ensure they remain attractive places for residents and to a wider range of businesses, and not just retailing. The Plan introduces some interesting policies that should ensure that town centres continue to be at the centre of community life in London in the future. The focus on purely retail uses needs to diminished to allow a wider range of businesses (including many more that are customer facing) to locate in town centres, especially in secondary and tertiary shopping streets.

User: New West End Company

Our main concern is to ensure that the London Plan recognise, appreciate and responds more fully to the importance of the West End – and in particular the International Shopping Centre which we represent - both to the economies of London and the UK and to the appeal of London to investors, talent and visitors, particularly in face of Brexit uncertainties. As a consequence, we believe that the London Plan should provide more detailed strategic guidance to support the good growth of the West End and in particular the International Shopping Centre.

Policy SD6 “Town centres” makes no mention of the International Shopping Centres.

User:	London Wildlife Trust

We support the principle of the town centres first approach (para 2.8.1), including the redevelopment of retail and leisure parks to deliver housing intensification (para 2.8.3).

User: Crest Nicholson PLC

We consider this Policy to be unsound and ineffective as currently drafted and amendments are required.

Crest Nicholson welcome the approach set out in the Draft London Plan to rejuvenate Town Centres. Town Centres often have good transport links and are therefore suitable for higher density mixed use schemes. It is important to remember that high density can still mean attractive and high quality residential accommodation and particular focus needs to be given as to how the residential interfaces with the public realm and creation of sufficient green spaces.

Crest Nicholson welcome the commitment to mixed use and residential only schemes in town centres and also the change of use of surplus office space to residential.

Crest Nicholson considers that there should be positive obligations placed on the Local Boroughs within the London Plan to ensure that sufficient land is identified to facilitate schemes involving new homes whether through regeneration of existing land and uses or otherwise..

We are concerned that promotion of night time activities and deliveries as well as Agent for Change proposals, could make it more difficult to locate residential dwellings within the town centres and so may reduce the quantum of dwellings that may be delivered in town centres; this in turn will impact on the housing supply figures for London. As such we consider the objectives in Part A should not be crafted as rigidly and instead the Boroughs should determine the best and most appropriate way of achieving the balance of uses in a town centre to ensure its vitality and viability. As such we consider Part A should be re-worded:

A When planning town centre development proposals, and when considering applications, the local planning authority should endeavour to achieve the following objectives… “

User:	CBRE Global Investing

Policy SD6 seeks to ensure London’s varied town centres and their vitality and viability are promoted and enhanced. The policy states that town centres should be locations for mixed-use and housing-led intensification and higher-density renewal, securing a high-quality environment and complementing local character and heritage assets.

Part C of the policy states that the potential for new housing within and on the edges of town centres should be realised through higher-density mixed-use or residential development.

CBRE Global Investors supports the principle of increasing density within town centres for a range of uses including residential.

User: Benhill Residents

Policies SD6, Town Centres, SD7 Town Centre Network, SD8 Town Centres, development principles and DPDs , SD9 Town Centre Partnerships and implementation

We have concerns about such a large amount of policy being focus on Town Centres, especially when increasing amounts of shopping is being done online.

Our concerns are the predominance of global stores and cafes; the viability of so many town centres being in close proximity to others, loss of local character and loss of shops, services, local markets and amenities that meet local needs and which are more likely provide employment to local people.

User: Catalyst Housing Limited

HOUSING SIZE MIX

Draft Policy SD6 relates to town centres and amongst other things, sets out the need to consider and encourage the suitability of these locations to accommodate (inter alia) smaller households. Draft Policy H12 A (6) cites the nature and location of a site as one of a number of factors determining the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme. It explains that a higher proportion of one and two bed units being generally more appropriate in more central or urban locations.

We support these particular parts of the Plan; greater flexibility to provide smaller units in urban locations is critical, given the challenges of accommodating and selling 3+ bed units in locations that are capable of sustaining high density development, which dictates a form of development which may not be conducive to larger units.

User:	Silvertown Homes

We strongly support the statement that ‘The potential for new housing within and on the edges of town centres should be realised through higher-density mixed-use or residential development, capitalising on the availability of services within walking and cycling distance, and their current and future accessibility by public
Transport’.

The success in pursuing this policy objective is likely to be significant to housing delivery. It should accordingly be set out across the Plan, including the Chapters on Design and Housing

User: Elaine Chambers

Policies SD6, Town Centres, SD7 Town Centre Network, SD8 Town Centres, development principles and DPDs , SD9 Town Centre Partnerships and implementation

We have concerns about such a large amount of policy being focus on Town Centres, especially when increasing amounts of shopping is being done online.

Our concerns are the predominance of global stores and cafes; the viability of so many town centres being in close proximity to others, loss of local character and loss of shops, services, local markets and amenities that meet local needs and which are more likely provide employment to local people.

User:	Historic England

We welcome the approach to town centres and the recognition that these are often historic centres. In particular we note:

Part A 2) refers to ‘… intensification ... complementing local character and heritage assets’

Part A 4) states town centres will be promoted and enhanced as ‘the main focus for Londoners’ sense of place and identity in the capital’

Para 2.6.1 states ‘Many town centres in London are of historic interest and contain high concentrations of heritage assets’

User: Earls Court Public Sector Tenants' Assoc

We have concerns about such a large amount of policy being focus on Town Centres, especially when increasing amounts of shopping is being done online.

Our concerns are the predominance of global stores and cafes; the viability of so many town centres being in close proximity to others, loss of local character and loss of shops, services, local markets and amenities that meet local needs and which are more likely provide employment to local people.

User: Living Streets

Policy SD6 Town centres

We support the following:

“3. the structure for delivering sustainable access by walking, cycling and public transport to a competitive range of services and activities”

“6. a key mechanism for building sustainable, healthy, walkable neighbourhoods with the Healthy Streets Approach embedded in their development and management”

“C. The potential for new housing within and on the edges of town centres should be realised through higher-density mixed-use or residential development, capitalising on the availability of services within walking and cycling distance, and their current and future accessibility by public transport. Residential-only schemes in town centres may be appropriate outside of primary and secondary shopping frontages where it can be demonstrated that they would not undermine local character and the diverse range of uses required to make a town centre vibrant and viable”.

User: Federation of Master Builders

Homes on our High Streets is a piece of research commissioned by the FMB to look at how we can make better use of our existing building stock in and around town centres to deliver more homes – with a particular focus on the empty space above shops. The rationale supporting the research chimes with the draft London Plan's goal of creating town centres with vitality and vibrancy and of the need to re-invent many of our town centres in light of changing patterns of retail and leisure. Increased residential usage should be a key part of this.

The Homes on our High Streets report has a deliberate focus on the practical considerations as to what is required to convert typical town centre space into viable residential units. In order to support this, six case study town centres were chosen one of which is in the London Borough of Harrow.

It is notoriously difficult to estimate the potential for this type of work, but surveys which have attempted to put a figure on it include the following:

- The British Property Federation estimated that 300,000 people could be housed in properties above shops – essentially equivalent to 300,000 one-bed flats.
- A 2003 Government report suggested that there was the potential for 420,000 new homes in empty commercial units including space above shops in England alone.
- An URBED study of the Housing Corporation's 'Social Housing Over Shops' scheme estimated that there may be the potential for 1.5m additional one bed flats.
- A report by Empty Homes highlighted a survey by York City Council which found that 36% of upper floors in buildings in central York were not in use and suggested there was the potential to create 800 one-bedroom properties from this space

Homes on our High Streets contain a number of recommendations. One key recommendation, which is directly relevant to the draft London Plan is that:

Local authorities should explicitly make reference to building homes above shops on the high street within their planning policies and documents (e.g. supplementary planning guidance and documents). This would signal to the market that this is a worthwhile option that the lead authority is willing to encourage.

The report also makes recommendations that local authorities should, in supporting this type of development, take the lead in finding ways to overcome disparate ownership and limited building access, which can otherwise hinder this work and work with community groups and developers to highlight potential for this type of redevelopment. We urge the Mayor to consider the report as its recommendations support and offer solutions to both the Housing and Town Centre elements of the draft London Plan.

User:	London Industrial and Logistics Sounding Board

Policy SD6 – Town Centres
This policy should be amended to encourage the provision of new last mile delivery/urban logistics facilities on suitable sites within or near town centres.

User:	Orbit

Orbit welcomes the encouragement of residential use within town centres and the acknowledgement of the suitability of town centre schemes for smaller households.

Orbit supports the redevelopment and change of use of surplus office space in town centres to other uses, including housing.

Noted that there seems to be a presumption in the policy that a town centre has excellent transport links. However, this is not always the case, for example Bexleyheath is not adjacent to any rail or underground stations and is instead served only by local bus routes.

User: Camden Town Conservation Area Advisory Committee

SD6

A 2) Draft policy: ‘locations for mixed-use or housing-led intensification and higher- density renewal, securing a high-quality environment and complementing local character and heritage assets’

Our proposed amendments – reasoning: Our proposed revised text would ensure consistency with the rest of the Plan, with the Plan’s stated heritage objectives, the recognition at Annex 1 Town Centre network p. 462 ‘Many have important clusters of civic, public and historic buildings’, and with the Mayor’s stated objectives for collaborative working with local communities.

Our proposed revised text: ‘locations for mixed-use or housing-led intensification and higher-density renewal, securing a high-quality environment and ~~complementing local character and heritage assets~~ preserving and enhancing heritage assets and complementing local character.

User:	Camden Town Conservation Area Advisory Committee

SD6 A 4)

Draft policy: ‘the main focus for Londoners’ sense of place and local identity in the capital’

Our proposed amendments – reasoning: Our proposed revised text would ensure consistency with the rest of the Plan, with the Plan’s stated heritage objectives, the recognition at Annex 1 Town Centre network p. 462 ‘Many have important clusters of civic, public and historic buildings’, and with the Mayor’s stated objectives for collaborative working with local communities.

Our proposed revised text: ‘the main focus for Londoners’ sense of place and local identity in the capital, <u>based in local landmarks, open spaces, views, and heritage assets</u>’

User:	Camden Town Conservation Area Advisory Committee

SD6 after J

Our proposed amendments – reasoning: Our proposed new text would ensure consistency with the rest of the Plan, with the Plan's stated heritage objectives, and with the Mayor's stated objectives for collaborative working with local communities.

Our proposed additional text: a new para 'K' 'K The role of heritage assets in tourism, and in the local sense of place, should be recognized and heritage assets preserved and enhanced as essential components contributing to the Town Centre strategy.'

User: Vital OKR

Drafting of comments on town centre policies was last on our list, and by the time we got to them time had nearly run out before the 5pm on 2nd March deadline to make a submission (in fact there were just 20 minutes to go). Therefore we only offer here a brief observation on a matter that is fundamental to the plan and urgently in need of review. We believe that town centre policy is the weakest aspect of the draft plan, that key evidence has been ignored, while an adequate (fuller) evidence base is lacking. While London faces fast denudation of its high street settings, as residential value trumps existing use value (so that single use housing developments are increasing), and as shortages of accommodation for diverse economic and civic life become ever more apparent, and we hear cries against the downsides of gentrification, the draft plan fails to make more than a passing reference to this complex challenge; it fails to require boroughs to inclusively bring London's high street settings within high street network designation; it tells us nothing about the breadth of uses the Mayor wants to see sustained and welcomed into town centres (surely much more than the NPPF list of main town centre uses, but we are not told that); it fails to tell us whether the Mayor foresees high streets lengthening and strengthening (or the sad reverse); it fails to define a protective intent for town centre policy; if fails to give any guidance on appropriate development formats within town centre designated areas; and it opens up the opportunity of ground floor residential within town centres while it should be stamping that out.

In our Old Kent Road area the thriving stretches of high street are outside of town centre designation, they have no planning status. Even if they were within town centre boundaries draft London Plan policy and proposed New Southwark Plan policy would not be clear with an intent to hold on to and expand the capacity for non?residential uses. It is all vulnerable, and we are starting to loose it. The same is going on along nearby Queens Road, Peckham Road, Camberwell Road and Southampton Way. Just as the need for a major expansion of high street accommodation becomes evident, as our population rises, as more prosperous people arrive, as waves of incoming businesses join burgeoning locally grown businesses, as new education and cultural institutes head our way, as our workshops, our bakeries and breweries burgeon, we find ourselves with shrinking scope of high street setting, and we see our local planning authority casually allowing a ferocious strip?out of depth accommodation (replaced with pure housing). Unless changed the London Plan will not help, indeed it could make matters far worse.

The Mayor’s own (excellent)High Streets for All document makes clear that close to 70% of high streets are potentially under threat as they have no planning designation. The London Plan must strongly guide boroughs to review town centre designation extents within Local Plans so that they much more fully encompass high street setting extents, then it must guide boroughs to set out policies that protect the space to welcome a diverse economy, and give it capacity to grow. The London Plan needs to insist that Local Plan town centre policies should define clear expectations for the way use mix in town centres should be done, and it should indeed be emphasised that ground floor residential is not appropriate in such settings as London needs to sustain its capacity to accommodate a full economic and civic life and allow its strong clustering in town centres.

We urge that there be a full review of town centre policy at the Enquiry in Public. While we have not been able to offer up extensive evidence and justification at this stage, we would like the opportunity to appear on this matter at the Enquiry.

User:	London Borough of Sutton

SUPPORT. The London Borough of Sutton supports Policy SD6 - Town Centres as it aligns with the town centre policies in the council's recently adopted Local Plan. The council's policies are aimed at making each of the borough's town centres distinctive, by building on their individual strengths and identity.

In terms of development, the council's policies direct 90% of the new housing development to town and district centres (most notably Sutton Town Centre - 55%, Hackbridge - 15% and Wallington - 10%). The Local Plan also allocates sites for additional retail and office development but also recognises that retail habits and, as a result, town centres are changing and so the Local Plan has relaxed retail requirements in secondary shopping frontages in order to encourage a wider range of town centre uses.

User:	Elephant & Castle Properties Co Limited

Policy SD6 – Town centres. We support this policy, and in particular SD6(D) which identifies town centre locations as appropriate for Build to Rent, as is proposed at Elephant & Castle. The policy should also recognise the role tall buildings have within town centre locations to optimise density and deliver new homes.

User: Durkan

Several policies support the optimisation of land, particularly in highly accessible locations:

Policy SD6 (Town Centres) recognises that centres should be promoted as locations for mixed-use or housing-led intensification and higher-density renewal, and that such locations are particularly suitable for smaller households and Build to Rent. Durkan is active in both inner and outer London locations and so welcomes this additional policy support

User:	Blackheath Society

Policy SD6 Town centres: We support the thrust of this policy. It requires however that local authorities show proper regard for the mixed character of town centres, particularly when considering changes of use. There should be no blanket presumption in favour of changes of use from, for example, office space to residential or eating/drinking establishments but such changes should be based on a careful evaluation of needs and existing circumstances.

User: Barnet Society

Policy SD6 – Town centres

We welcome the Mayor's commitment to promoting and enhancing the vitality and viability of town centres like ours, and his recognition of the importance of balancing the demands of housing and commerce, including affordable business space.

We agree that higher-density development is a promising way forward – but only provided that it is carried out on a scale that relates to existing neighbouring buildings and greenery, and that its design is of high quality.

Although in principle transport hubs are logical places for intensified use, it should be noted that none of the three rail stations within or adjoining our area – High Barnet, New Barnet (Network Rail) and Totteridge & Whetstone – directly adjoin their local shopping streets, nor do they connect well with existing bus services. There are also limits to development around High Barnet Station without eroding the vegetation which makes it one of Chipping Barnet's attractive 'green gateways'.

We wish to make it clear, too, that we would not welcome indiscriminate densification of residential areas more than a short walk from High Streets and transport hubs – much less than the 800m specified in Policy H2 (see below). It would only be acceptable on brownfield sites and at heights to suit our suburban context.

User: Alzheimer's Society

1. Town centres are a vital part of ensuring that people affected by dementia can carry on taking a full part in their communities. It's encouraging to see that **Policy SD6 Town centres** explicitly talks about the accessibility of these town centres, and it is to be hoped that accessibility covers those with cognitive impairment as well as physical impairment.
2. **SD6.B** recognises that shopping habits are changing and becoming based more and more in the online space. However it is important that the intrinsic value of a community hub is not lost if The London Plan is to meet its aim of reducing social isolation. Many of the spaces that people with dementia would have traditionally used, such as libraries, community centres, and theatres, are closing down. How this gap is filled will be vital to mental and physical wellbeing as well as reducing isolation. As this strategic policy gets developed and becomes more specific, we would encourage planning authorities to consult with people affected by dementia about what is important to them about a town centre.
3. The suggestion in **SD6.D** that older people's housing would be suitable for town centres is to be welcomed, as it would keep people affected by dementia at the heart of the community and make the town centre's accessible to them. However, this must only be with satisfactory provisions in place to ensure the safety of the residents.
4. SCIE has provided some warnings about the effect of a noisy environment on people with dementia[1] and so, while bringing people with dementia closer to amenities is a good thing, it must be done sensitively and with understanding of the condition. We would expect to see this explicitly addressed in the Building Regulations documents that will support the London Plan.
5. Policy **SD6.H** envisages an inclusive town centre environment that meets the needs of all Londoners. We thank the Mayor for his support of the Dementia Friendly London initiative and hope to see, as part of that, more town centres adopting the principles set out in the Becoming a Dementia Friendly Retailer guide[2]

[1] https://www.scie.org.uk/dementia/supporting-people-with-dementia/dementia-friendly-environments/noise.asp

[2] https://www.alzheimers.org.uk/download/downloads/id/3064/dementia_friendly_retail_guide.pdf

User: Aitch Group

My client fully support the intensions of this policy and town centres, in addition to Opportunity Areas, should be seen as the main reservoirs of housing delivery/ growth. However, it is critical that the policy is stronger and goes further to require town centres to deliver development at the highest possible densities, consistent with other objectives of this plan.

It has been my clients experience, particularly in outer boroughs that there isn't sufficient local support for higher density development and that applications are refused because of compatibility concerns with existing townscape, rather than planning for future growth. There are two factors that are critical to this.

Firstly, the policy should make it clear that applications should not be refused on townscape or design grounds where there are no other symptoms of overdevelopment, such as amenity impacts or impacts on heritage assets. Where there are no such impacts, buildings in or on the edge of town centres should be at least five storeys.

It is often the case that new developments may be larger in scale than existing neighbouring buildings, particularly in town centres that have not seen significant investment in recent years. To constrain development to match such townscape will not allow the delivery of sufficient new homes to meet London's housing need.

Secondly, a coordinated approach should be taken to car parking. This is particularly relevant to outer London boroughs that do not have Controlled Parking Zones in place or there is a piecemeal approach. This policy, should be amended to reflect the NPPF and make it clear that permission should not be refused on parking grounds unless there is a 'severe' impact. Furthermore, it should make it clear that

Boroughs should plan strategically to accommodate development and if there is parking pressure should introduce CPZ's so that it doesn't exacerbate the problem.

We also support the policies recognition that town centre and edge of centre sites are most suitable for smaller households, including studios, one and two bed units. My client recognises the importance of the provision of some family accommodation but in practice, this can be difficult to provide in significant quantities due to challenges of required amenity space and parking.
permission in town centres or on edge of centre sites should not be refused due to a CPZ not being in place.

User:	United Colleges Group (UCG)

Draft Policy SD6 establishes that London’s varied town centres should be promoted and enhanced, to include a range of uses including social and community infrastructure. The drive for mixed use, high density intensification and, in particular, the support for development which delivers a mix of uses which would contribute to the social infrastructure in areas of maximum accessibility.

The Group welcomes the ‘Town Centre First’ approach and the supporting clarification brought by Figure 2.18, which clarifies that educational uses would be acceptable in district and major centres where footfall is high and accessibility greatest

User: Highgate Society

SD6(A2) Object

This policy seeks to achieve its aim through “high density renewal”. Whilst this does not apply to all of London’s town centres, others such as Highgate, Hampstead or Barnet have a historic core and this has been part of their attraction, both in terms of a liveable environment and attracting people and businesses. The Plan must make clear that “high density renewal” must take account of, and be sensitive to, London’s unique and irreplaceable heritage and Conservation Areas.

The plan calls for tourist infrastructure, attractions and hotels in town centre locations, but clearly many town centres do not have land available for such uses.

SD6(H) Comment

This calls for the delivery of barrier-free and inclusive town centres, meeting the needs of all Londoners including the elderly, the disabled and families with young children. Interestingly, public toilets are suggested, as are (elsewhere in the plan) public benches and drinking fountains. The points about access, improved public transport and parking for cars (as mentioned above) could be applied here.

User: Lidl UK GmbH

Policy SD6 – Part B

Lidl is supportive of the draft Plan's aspiration to allow town centres to adapt and restructure to technological changes and customer behaviour. The way in which people use town centres, and how they go shopping for groceries, has changed over the past decade and will continue to evolve. Therefore, it is entirely correct for Policy SD6 to acknowledge this evolution and be positive about the need for change. In Lidl's view, the Plan must acknowledge two particular aspects of change. First, it is likely that the format of retail space within centres will change as it responds to multi-channel retailing and service provision. Second, traditional town centres can, in some instances, be placed at a disadvantage when compared to e-commerce and therefore they will need a flexible policy environment in which to compete. This should be acknowledged in the Plan when it discusses the support for maintaining and enhance the role and function of town centres.

Policy SD6 – Part C

Lidl agrees in general terms that the introduction of new residential uses in and around town centres can help to add vitality to centre and boost the spending power of the local population. As such, it is correct for SD6 to encourage residential uses in certain situations.

However, Lidl would like the content of SD6 Part C to be revised to ensure that the promotion of residential accommodation does not have a detrimental impact upon the ability to provide a range of retail units to meet the needs of retailers. In particular, at the present time the only control in the draft policy relates to residential-only (re)development schemes outside of the defined primary and secondary shopping frontages. Such schemes would be appropriate where:

"they would not undermine local character and the diverse range of uses required to make a town centre vibrant and viable". Lidl considers that this latter consideration focuses too much on negative impacts of residential only development proposals and fails to accord with the overall strategy in Policy SD6 which aims to promote and enhance town centres. Therefore, given that the Plan aims to pursue a town centres first policy for retail uses, there should be a presumption against residential-only developments within town centre boundaries. Otherwise,

there is a concern that town centres could well fail to continue to provide adequate modern new space for retail uses (plus other uses which make a positive contribution to providing active ground floor frontages), with the content of SD6 Part C falling into conflict with Policy SD8 which required local planning authorities to allocate sites to meet identified needs.

Part C does not contemplate residential-only schemes in the primary and secondary frontages. Whilst this is to be welcomed, Lidl considers that the policy should go further and ensure that residential development on the upper floors of development proposals do not compromise the ability to provide different types of retail accommodation to meet acknowledged demand from convenience and comparison goods retailers. This should include larger format units to allow grocery operators to operate in central locations. Lidl's experience of residential-led mixed use developments in and around town centres in London is that the inclusion by developers of ground floor retail space is merely a 'box ticking' exercise and leads to retail space which is incompatible with the needs of the retail sector and poor quality. The policies in the plan need to ensure that this does not happen in the future.

User: Chairs of Camden's Conservation Area Advisory Committees

SD6 A 2) Draft policy: ‘locations for mixed-use or housing-led intensification and higher- density renewal, securing a high-quality environment and complementing local character and heritage assets’
Our proposed amendments – reasoning: Our proposed revised text would ensure consistency with the rest of the Plan, with the Plan’s stated heritage objectives, the recognition at Annex 1 Town Centre network p. 462 ‘Many have important clusters of civic, public and historic buildings.’, and with the Mayor’s stated objectives for collaborative working with local communities.
Our proposed revised text: ‘locations for mixed-use or housing-led intensification and higher-density renewal, securing a high-quality environment ~~and complementing local character and heritage assets~~ preserving and enhancing heritage assets and complementing local character.’

SD6 A 4) Draft policy: ‘the main focus for Londoners’ sense of place and local identity in the capital’
Our proposed amendments – reasoning: Our proposed revised text would ensure consistency with the rest of the Plan, with the Plan’s stated heritage objectives, the recognition at Annex 1 Town Centre network p. 462 ‘Many have important clusters of civic, public and historic buildings.’, and with the Mayor’s stated objectives for collaborative working with local communities.
Our proposed revised text: ‘the main focus for Londoners’ sense of place and local identity in the capital, based in local landmarks, open spaces, views, and heritage assets’

SD6 after J Our proposed amendments – reasoning: Our proposed new text would ensure consistency with the rest of the Plan, with the Plan’s stated heritage objectives, and with the Mayor’s stated objectives for collaborative working with local communities.
Our proposed additional text: a new para ‘K’ ‘K The role of heritage assets in tourism, and in the local sense of place, should be recognized and heritage assets preserved and enhanced as valuable components contributing to the Town Centre strategy.’

User: Aberdeen Standard Investments

We support the recognition in Part C of the Policy of the potential for new housing within and on the edge of town centres should be realised through higher-density mixed-use or residential development, capitalising on the availability of services within walking and cycling distance and their current and future accessibility by public transport.

Despite being a major town centre, Wimbledon Town Centre is currently characterised by lower density development and there is a clear opportunity to increase density whilst still respecting heritage assets.

As a highly accessible town centre, Wimbledon is an appropriate and sustainable location for office as well as housing development. Given the limited number of available sites in Wimbledon, combined with their constraints, this is likely to require higher density development and re-development in order to deliver appropriately sized floorplates.

Turning to Part E, there has been a loss of office space in suburban town centres such to permitted development rights schemes. This has led to a shortage of modern offices and we consider there is an opportunity to increase office space in locations such as Wimbledon through higher density mixed-use development. This would re-inforce Wimbledon's position as an office location.
Wimbledon is already a successful and attractive location for evening attractions but there are opportunities to enhance that provision. Therefore we support the promotion of such activities in Part F.

User: HammersmithLondon

HammersmithLondon supports draft Policies SD6, SD7, SD8 and SD9, which relate to the role of neighbourhood, district, major, metropolitan and international town centres. Hammersmith is an established major centre with the potential to be upgraded to a metropolitan centre. Future investment should reflect this potential.

In addition to growth, the ability to diversify is also important. The role and function of the high street is changing and town centres must adapt to meet evolving consumer expectations. It is clear that town centres must provide a range of services and opportunities which support and complement its traditional function as a retail hub. Cultural venues are of increasing importance throughout the capital. The support and protection for such facilities, as set out in draft Policy HC5, is supported.

Diversification will strengthen the town centre network and support its viability. Traditional planning policies have sought to protect retail use but draft Policy SD6 is clear in that a greater degree of flexibility is required. These changes may include better infrastructure to support the logistics involved in ‘Click and Collect’ shopping and greater support for any leisure facilities which would support and promote this behaviour, rather than have goods delivered to the home.

Similarly, the measures to provide more low-cost business space and affordable workspace, as set out in draft Policies E2 and E3 are supported. Small and Medium Enterprises are a key driver of the local economy. Such measures should also extend to retail uses. Smaller, and more flexible floor plats and the benefits of retail diversity could be further highlighted within the Plan.

The wording of draft Policy HC6 also supports later operating hours, with a focus on the evening and night-time economy. Hammersmith Town Centre already benefits from a healthy evening

economy, and any policy which supports this growth is welcomed. That said the Policy should be amended to reflect the differences between the local impact of individual night-time venues and activities. The Policy should allow for more discretion at local level.

As a Business Improvement District (BID), HammersmithLondon is well placed to work with the Local Planning Authority to identify the constraints and opportunities in improving the evening and night time economy of Hammersmith Town Centre, and can work with them to develop a vision and management plan for this, achieving a night-time economy which is accessible and safe for all to use.

User:	Sustrans

SD6 A 3 & 6

Strongly welcome the role of Town Centres in facilitating and improving the accessibility, attractiveness and convenience of walking and cycling.

SD6 C

We welcome the consideration given to walking and cycling distances in the consideration of new housing in town centres.

User: Gravesham Borough Council

Town Centres

The plan recognises the changing role of town centres and the pressure online shopping has placed on their ability to function. There is a recognition of the importance of diverse town centres which have a vibrant daytime and night-time economy and provide a hub for a varied range of uses.

The plan acknowledges that the changing trends for how consumers shop, creates both opportunities and challenges for town centres including adapting to innovative ways of retailing, accommodating new space where there is a demand and need and managing the transition of surplus retail space to other uses such as intensive mixed-use.
The plan includes more explicit support for residential development in town centre locations and gives more flexibility for local authorities to look at how town centres are planned so they can make best use of space and facilities to create sustainable locations with active day and night time economies (pg79).

This is welcomed.

User:	Vital OKR

We note that town centre policy does not align with E2, as there is no mention there of the need to protect and plan for low?cost business space. Likewise the helpful text in para 6.2.1 finds no echo in the town centre policies and supporting text. This should be corrected.

User:	Hornsey & Wood Green Labour Party

We welcome the promotion of the vitality and viability of London’s town centres and support their enhancement and strengthening for a wide range of activities such as employment, business space, shopping culture and social infrastructure. We particularly support para H and want see more emphasis on a highly accessible and inclusive town centre environment which provides well-designed crossing points, dropped kerbs, seating and public toilets as well as cycle lanes and cycle parking.

User: Redrow Homes London Division.

We strongly support the statement that ‘The potential for new housing within and on the edges of town centres should be realised through higher-density mixed-use or residential development, capitalising on the availability of services within walking and cycling distance, and their current and future accessibility by public Transport

The success in pursuing this policy objective is likely to be significant to housing delivery. It should accordingly be set out across the Plan, including the Chapters on Design and Housing. We also suggest that this policy also makes it clear that the Mayor will also support higher density residential development in accessible locations near transport hubs, even if not defined as a “centre”.

User: Mr Drew Stevenson

In his vision in the Foreword, the Mayor sees “A city where people can spend less time commuting because we have so many thriving parts of London, with good affordable housing combined with exciting, cutting-edge career opportunities.” That is a very appealing prospect and **should be heavily supported**. However, it will not happen easily. The London Plan since its early days in 2004 has attempted to encourage Town Centre growth but, with one or two notable exceptions (Stratford for example) really significant growth has been hard to achieve outside Inner London.

The housing policies in the draft LP make clear that a lot of growth needs to be in and around the Town Centres, including the contentious statement that “local character evolves over time and will need to change in appropriate locations to accommodate additional housing provision.” (Policy H2B 1). In general, I agree with that. My main concern is that, if growth (not just housing) cannot be attracted to the suburbs, not only will the housing targets be missed, but the quality of life, with increased commuting on over-crowded trains and even heavier pollution, will deteriorate further.

I think that the difficulties of turning this around should not be underestimated and therefore:

*****I suggest that** the preparation of Town Centre strategies and the release of housing sites in Outer London be given a priority by the Mayor alongside the Opportunity Areas nearer the centre.

It is equally important that employment uses are encouraged to spread further. It is worrying for example that in the Elizabeth Line East corridor, there are only 500 jobs planned in Ilford and in Romford, but 65,000 in Stratford alone (with 110,000 in the neighbouring Isle of Dogs). Greater investment and commitment to preparing integrated strategies, with the involvement of the Mayor, are needed in the suburbs.

I don’t think its an exaggeration to say that the success of the Plan in creating the kind of polycentric city that lies behind the thinking in the Mayor’s Foreword, will hinge on the success of those strategies.

User:	Andrea Carey Fuller

In D5, GG1 F, SD6 H, H16 4.16.10 and S6, add ‘children and young people as follows: disabled people, older people, children and young people and families with young children.

User: Andrea Carey Fuller

We have concerns about such a large amount of policy being focus on Town Centres, especially when increasing amounts of shopping is being done online.

Our concerns are the predominance of global stores and cafes; the viability of so many town centres being in close proximity to others, loss of local character and loss of shops, services, local markets and amenities that meet local needs and which are more likely provide employment to local people.

User: Lendlease

We support the promotion and enhancement of London’s town centres, particularly regarding the potential for new housing within and on the edges of town centres, realised through higher-density mixed-use or residential development, capitalising on the availability of services within walking and cycling distance, and their current and future accessibility by public transport.

This is a sound strategy recognising the greater public accessibility and services available within them. In particular we support part D which identifies town centres are particularly suited to smaller households and Build to Rent.

Having regard to Part I, we note that town centres will not be the only suitable location for social infrastructure. It should be located suitably for the community it serves, and while this will often be town centre locations, other locations could be more suitable. This should be applied flexibly dependant on the actual facility, size and priority.

User:	UKWA
Missing from this is the provision for warehousing/consolidation/urban logistics space to enable last mile deliveries.	

User: Cross River Partnership

The continuation of a Town Centres First Approach to resist damaging out-of-town development is welcome.

As is agglomeration of uses in town centres including Evening and Night Time Economy and cultural assets.

We support the sentiment behind Policy SD6 and believe this is a strong statement about London's Town Centre Network.

We recommend that it is recognised in The London Plan that vital and viable town centres across London, with a mix of services and employment opportunities become sustainable communities in themselves, reducing the need for people to travel across the city with positive ramifications for issues such as congestion, air pollution and capacity. Promoting a 'work local' campaign for businesses alongside a 'shop local' initiative would be welcomed.

User:	Oneill Homer

SD6 Neighbourhood plans (especially those that are business-led) can help manage and promote change in smaller town centres, precincts and parades based on their intricate knowledge of their local area.

User: Unknown

Our client supports Policy SD6 of the London Plan, in particular the reference to town centres being a suitable location for Build to Rent and mixed-use developments. As previously highlighted, our client is delivering the single largest Build to Rent scheme in the UK, the majority of which is located within the town centre or edge of centre. Our client has delivered two BtR developments that have already been completed (one scheme comprising 472 rental units and the other scheme comprising 362 rental units) and successfully occupied without delay. These provide two examples of BtR schemes in town centre locations, situated between a tube station and a railway station that are complemented by a strong retail and leisure offer.

User: L&Q

Higher density residential at the edge of town centres

We strongly support the statement that ‘The potential for new housing within and on the edges of town centres should be realised through higher-density mixed-use or residential development, capitalising on the availability of services within walking and cycling distance, and their current and future accessibility by public Transport’.

The success in pursuing this policy objective is likely to be significant to housing delivery. It should accordingly be set out across the Plan, including the Chapters on Design and Housing.

User:	London Borough of Camden
We support the objective of this policy to promote and enhance town centres.	

User:	Local London Partnership

We disagree with the proposition that developments in town centres should cater to predominantly smaller households, Build to Rent, older people’s housing and student accommodation. This discriminates against families, can result in less inclusive and mixed communities and undermines local plan-making. The evidence from SHAMAs undertaken by boroughs in Local London is that there is considerably more demand for family size units of more than two bedrooms than is indicated in the SHAMA underpinning the London Plan assumptions.

User: Kingston First

Kingston First supports draft Policies SD6, SD7, SD8 and SD9, which relate to the role of neighbourhood, district, major, metropolitan and international town centres. Kingston is an established Metropolitan Centre which performs well, but to remain relevant and viable it must respond to the various challenges facing UK high streets.

The role and function of the high street is changing and town centres must adapt to the evolving consumer expectations. Traditional planning policies have sought to protect retail use but draft Policy SD6 is clear in that a greater degree of flexibility is required These changes may include better infrastructure to support the logistics involved in 'Click and Collect' shopping and greater support for any leisure facilities whtch would support and promote this behaviour, rather than have goods delivered to the home.

User: Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living

SD6 (78)-Town Centre

We strongly support initiatives which improve mobility, infrastructure and accessibility for older people.

Parts D of the policy notes the suitability of these areas for older people's accommodation but this also needs be considered in conjunction with the appropriateness of adjacent uses. This would really be demonstrated by Part F which discusses the need for varieties of uses within the town centre.

In terms of the use and legibility of town centres, Part H is to be welcomed but needs to be holistic. Furthermore, there also needs to be a system of maintenance for these elements.

We support this policy.

User:	Barts Health NHS Trust

Town Centre Classifications

Whitechapel is identified as a district centre in the draft London Plan. The draft London Plan should recognise that Whitechapel is an area of significant change and civic importance; as well as being home to one of Europe's largest hospitals it will soon see the opening of the London Borough of Tower Hamlets' Civic Centre. The opening of Crossrail line 1 is also likely to be transformational.

As such the draft London Plan should highlight the potential for Whitechapel to rise up the hierarchy of centres during the lifetime of the Plan.

User:	Age UK London - a charity working with older Londoners

POLICY SD6: TOWN CENTRES

CRITERION F: The management of vibrant daytime, evening and night-time activities should be promoted to enhance town centre vitality and viability, AND SAFETY, having regard to the role of individual centres in the night-time economy (see Figure 7.7 and Table A1.1) and supporting the development of cultural uses and activity.

User:	Regeneration X

Policy SD6 Town Centres
The draft London Plan talks about the intensification of town centres especially for residential development. It says that tourist infrastructure, attractions and hotels in town centre locations, especially in outer London, should be enhanced and promoted. But there is no real detail on how this will be funded and delivered, especially the supporting infrastructure, the open spaces etc. Why is the Mayor and the Plan obsessed with the Night-time economy? There is plenty of evidence that the night-time economy is harmful to health, so why is it being pushed? The negative effects of the night-time economy are totally ignored.

User:	Joy Brown

Policy SD6 Town centres. D speaks of using town centres for older people's housing. This may provide access to shops etc but town centres are noisy and are supposed to increase their vibrancy and night time activity. Do not condemn older people to noisy locations.

User:	Karl Brown

2.6.1 and related. The focus on the importance of town centres as wide ranging support to communities, other than simply shopping, is welcomed.

User:	Atkins

The Plan supports a town centre first approach (Policy SD6), with town centres acting as viable hubs for a range of uses (retail, leisure, culture, residential and business space), mixed use housing led intensification, and strengthening local character. Potentially this policy has significant implications for growth and redevelopment in outer London, the policy doesn’t make any specific references to outer London.

User:	Mr John Taylor

Similarly, the town centres first approach and the preference for the redevelopment of retail and leisure parks to deliver housing intensification, as stated in the plan, is not appropriate for Mill Hill where the main town centre is restricted by limited space and the need for more social amenities is expected to grow. The Draft New London Plan’s positive approach to the Build to Rent sector is also unsuitable for an area, such as Mill Hill where the demand is for family-sized homes.

User: Domino's Pizza Group plc

Policy SD6, Town Centres

We fully support the London Plan's town centre first approach. Local town centres are central to the lives of Londoners and we believe commercial premises make a positive contribution to their vitality and viability. Domino's welcomes the opportunity to be present on local high streets, close to our customers.

We similarly recognise the need to adapt and restructure town centres in line with changes in technology and purchasing behaviour, including improved management of servicing and deliveries. In this, we are keen to ensure we can operate in proximity to other businesses.

User:	Bexleyheath Business Improvement District

We are particularly pleased to see town centre Health checks, input and support passed back to the local authorities to consider each town centre in its own right and not blanket cover them all under one startegy/plan. However the plan does not mention how this is to be implemented or funded and we fear that this could be open to local interpretation. For example town centres that have a BID could be asked by the authority to fund these actions rather than action them directly. Far too often BIDs are being asked to undertake tasks and projects that are not able to prove additionality to any baseline services and this could prove to be another of these problematic areas.

User: London national Park City Foundation

Town centres - Policy SD6, Pages 78 - 79

LNPCF PROPOSAL: LNPCF finds that Policy SD6 overlooks quality urban greening of high biodiversity value and it is not explicit from the text below that these will be covered by Policy SD6's use of the term 'social infrastructure':

1. London's varied town centres and their vitality and viability should be promoted and enhanced as:

1) strong, resilient, accessible, inclusive and viable hubs for a diverse range of uses including employment, business space, shopping, culture, leisure, night-time economy, tourism, civic, community, social infrastructure and residential development

2) locations for mixed-use or housing-led intensification and higher-density renewal, securing a high-quality environment and complementing local character and heritage assets…(and)

6) a key mechanism for building sustainable, healthy, walkable neighbourhoods with the Healthy Streets Approach embedded in their development and management.

LNPCF notes that 'social infrastructure' is defined on page 202 as follows:

5.1.1 Social infrastructure covers a range of services and facilities that meet local and strategic needs and contribute towards a good quality of life. It includes health provision, education, community, play, youth, recreation, sports, faith, and emergency facilities.

We also note that Green infrastructure in all its forms is also a key component of social infrastructure, and is addressed separately in Chapter 8, Policy G3 Metropolitan Open Land and Policy G4 Local green and open space.

User: Primrose Hill Conservation Area Advisory Committee

SD6 A 2) Draft policy: ‘locations for mixed-use or housing-led intensification and higher- density renewal, securing a high-quality environment and complementing local character and heritage assets’

Our proposed amendments – reasoning: Our proposed revised text would ensure consistency with the rest of the Plan, with the Plan’s stated heritage objectives, the recognition at Annex 1 Town Centre network p. 462 ‘Many have important clusters of civic, public and historic buildings.’, and with the Mayor’s stated objectives for collaborative working with local communities.

Our proposed revised text: ‘locations for mixed-use or housing-led intensification and higher-density renewal, securing a high-quality environment ~~and complementing local character and heritage assets~~ preserving and enhancing heritage assets and complementing local character.’

SD6 A 4) Draft policy: ‘the main focus for Londoners’ sense of place and local identity in the capital’

Our proposed amendments – reasoning: Our proposed revised text would ensure consistency with the rest of the Plan, with the Plan’s stated heritage objectives, the recognition at Annex 1 Town Centre network p. 462 ‘Many have important clusters of civic, public and historic buildings.’, and with the Mayor’s stated objectives for collaborative working with local communities.

Our proposed revised text: ‘the main focus for Londoners’ sense of place and local identity in the capital, based in local landmarks, open spaces, views, and heritage assets’

SD6 after J Our proposed amendments – reasoning: Our proposed new text would ensure consistency with the rest of the Plan, with the Plan’s stated heritage objectives, and with the Mayor’s stated objectives for collaborative working with local communities.

Our proposed additional text: a new para ‘K’ ‘K The role of heritage assets in tourism, and in the local sense of place, should be recognized and heritage assets preserved and enhanced as valuable components contributing to the Town Centre strategy.’

User: Regent's Park Conservation Areas Advisory Committees

SD6 A 2) Draft policy: ‘locations for mixed-use or housing-led intensification and higher- density renewal, securing a high-quality environment and complementing local character and heritage assets’
Our proposed amendments – reasoning: Our proposed revised text would ensure consistency with the rest of the Plan, with the Plan’s stated heritage objectives, the recognition at Annex 1 Town Centre network p. 462 ‘Many have important clusters of civic, public and historic buildings.’, and with the Mayor’s stated objectives for collaborative working with local communities.
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Our proposed additional text: a new para ‘K’ ‘K The role of heritage assets in tourism, and in the local sense of place, should be recognized and heritage assets preserved and enhanced as valuable components contributing to the Town Centre strategy.’

Policy SD7 Town centre network

User:	Earls Court Public Sector Tenants' Assoc

We have concerns about such a large amount of policy being focus on Town Centres, especially when increasing amounts of shopping is being done online.

Our concerns are the predominance of global stores and cafes; the viability of so many town centres being in close proximity to others, loss of local character and loss of shops, services, local markets and amenities that meet local needs and which are more likely provide employment to local people.

User:	Living Streets

We support “F. Local and neighbourhood centres should focus on providing convenient and attractive access by walking and cycling to local goods and services needed on a day-to-day basis”.

User: HB Reavis UK Limited

HB Reavis supports policy SD7 which emphasises that the changing role of town centres should be proactively managed in relation to the town centre network as a whole, in order to support sustainable economic growth across the Greater London boundary to enhance the vitality and viability of London's centres.

Policy states that identified deficiencies in the London town centre network can be addressed by promoting centres to function at a higher level, designating new centres or reassessing town centre boundaries. In terms of designating new centres, Figure A1.1 within Annexe 1 shows the Future Potential Changes to the Town Centre Network.

HB Reavis considers that given the regeneration potential and strategic importance of Waterloo within Lambeth, the Mayor should give consideration to designating a CAZ Retail Cluster at Waterloo in order to support Waterloo's role within the CAZ as a business, retail, residential, cultural and tourist destination, and recognising its Opportunity Area designation to deliver significant numbers of new jobs and homes.

User: Camden Town Conservation Area Advisory Committee

SD7 C

We object to the designation of Camden Town as a Metropolitan Town Centre, at our submission on Annex 1. At this location (SD7 C) we note that the powers granted to the Mayor, and referenced in this policy, would allow the Mayor to act as planning authority in such areas, taking away planning powers from our local Council.

User:	London Borough of Sutton

SUPPORT WITH CONDITIONS. The London Borough of Sutton broadly supports Policy SD7 -Town Centre Network and, by extension, the classifications in Annex 1 . The council welcomes the classification of Sutton as a Metropolitan Centre, which the council is positioning as a complementary centre to Kingston and Croydon, and it particularly welcomes the classification of Sutton Town Centre as a night-time economy destination and as a centre with medium growth potential from commercial and office development.

With regard to District Centres, however, the council considers Carshalton Village and Cheam Village should both be designated NT3 (areas with a night-time economy of more than local significance). The council considers that both centres “punch above their weight” in terms of the night-time economy: Carshalton Village in terms of an array of historic pubs, which draws customers from Croydon, Mitcham and Sutton; and Cheam Village in terms of its choice of restaurants, which draws diners from beyond the Greater London boundary.

User:	Elephant & Castle Properties Co Limited
Policy SD7 – Town centre network. We support this policy, the definition of major town centres, and the classifications identified for Elephant & Castle in Annex 1.	

User: Argent (Property Development) Services LLP

Policy SD7 – Town Centre Network

As well as being Opportunity Areas, many of Argents interests are located in existing or future designated town centres. Argent supports the general approach to town centres but are concerned that there is no distinction between whether the policies (SD6 to 8) relate to existing or future town centres. The supporting text and policies should make this clearer.

Policy SD7 is concerned with the town centre network and Table 1.1 sets out future potential changes to the town centre network. Brent Cross is identified as a centre which has the potential to be re-classified as a Metropolitan Centre in the future (see also Paragraph 2.7.4).

However, Brent Cross should be re-classified as a Metropolitan town centre now as part of the current Plan rather than deferring it until later. The Planning Permission for Brent Cross regeneration scheme has now been implemented (Ref No F/04687/13). Argent has secured Reserved Matters approval for the detailed design of Phase 1A (South) and Phase 1B (South), delivering over 300 residential homes to the south of the A406. The Brent Cross Cricklewood Development Partners also have detailed permission for phase 1(A) North, which contains all key infrastructure including expansive highway and junction improvements, and Phase 1B(North), which includes the transformation of Brent Cross Shopping Centre.

Brent Cross should also be allocated a night-time economy classification. The approved development will deliver a mix of evening activities, including cultural, leisure, entertainment, food and drink, and shopping facilities.

User: Croydon Limited Partnership

CLP welcome the continued recognition of Croydon as a Metropolitan centre and support the strategic objective set out in Policy SD7 that International, Metropolitan and Major town centres should be the focus for the majority of higher order comparison goods retailing, whilst securing opportunities for higher density employment, leisure and residential development in a high quality environment.

Table A1.1 provides further detail in respect of the roles of each town centre and Croydon is identified as an area of regional or sub-regional significance in respect of its function within the night time economy; an area with high commercial and residential growth potential; and a centre which has the capacity, demand and viability to accommodate new speculative office development. Croydon is also classified as a strategic area for regeneration. CLP welcome the ongoing recognition of Croydon's growth potential in respect of the identified development sectors which will assist enable its regeneration to come forward.

It is noted that Figures A1.1 to A1.5 which support Table A1.1 are a useful addition but are difficult to navigate and should include labels so that specific centres can be easily recognised.

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User: Brent Cross Cricklewood Development Partners

Policy SD7 is concerned with the town centre network and Table 1.1 sets out future potential changes to the town centre network. As with the earlier versions of the London Plan, Brent Cross is identified as a centre which has the potential to be re-classified as a Metropolitan Centre in the future. Paragraph 2.7.4 notes that "*These centres are not recommended for immediate reclassification, however it is recognised that they may be appropriate for future reclassification, subject to strategic and Local Plan policies and conditional on matters such as capacity analysis, impact assessments, land use, public transport, walking and cycling, planning approvals and full implementation*."

The DPs support the recognition that Brent Cross should be given Metropolitan status. However, the context to the regeneration of BXC has changed since the previous London Plan was produced, to the point where development will commence imminently and as a result, Brent Cross should be re-classified as a Metropolitan town centre as part of the revised London Plan.

The BXC regeneration scheme has made significant progress with the planning permission now implemented and detailed design approved for Phase 1(A) North, which contains all key infrastructure including expansive highway and junction improvements. Detailed design for Phase 1B (North) has also been secured, which includes the transformation of Brent Cross Shopping Centre from an inward facing shopping centre to an outward facing network of streets and spaces, as well as a new high street which links to a pedestrian and cycle bridge over the A406, a new bus station and extensive public realm works. Pre-commencement conditions are now being prepared for discharge and early works are progressing on site ahead of main works beginning in Q1 2019. Argent Related, who are delivering the elements of the scheme south of the A406, has secured consent for the detailed design of Phase 1A (South) and Phase 1B (South), delivering over 300 residential homes.

Construction of the project will be well advanced by the time the London Plan has progressed through Examination in Public and has been adopted. In light of this, and alongside the continued recognition of the importance of the regeneration scheme within both strategic and local plan policy, Brent Cross in its regenerated form should be identified as a Metropolitan town centre. This re-classification will enable Barnet's Local Plan to respond accordingly and develop a policy framework that will give the scheme the support it needs to fully realise its growth potential.

Table A1.1 provides further detail in respect of the roles of each town centre and Brent Cross is identified as an area with high commercial and residential growth potential and a centre which has the capacity, demand and viability to accommodate new and/or speculative office development. Brent Cross is also classified as a strategic area for regeneration. The DPs welcome the ongoing recognition of the town centre's growth potential in respect of the identified development sectors which will assist enable its regeneration to come forward.

Notwithstanding this, we question why Brent Cross has not been allocated a night-time economy classification. The approved development scheme which will be coming forward imminently will comprise a mix of evening activities, including cultural, leisure, entertainment, food and drink, and shopping facilities. It is therefore considered that this should be recognised within the London Plan and a classification be applied accordingly to support the contribution that the development will have on the night-time economy within London.

It is noted that Figures A1.1 to A1.5 which support Table A1.1 are a useful addition but are difficult to navigate and should include labels so that specific centres can be easily recognised.

User: Petts Wood & District Residents' Association

As previously stated in point 3 above, Petts Wood does not have any vacant development sites. Therefore, PWDRA is at a loss to identify the rationale behind this ‘judgement’ (pages 478-9 Table A1.1 Town Centre Network).

Within the 800m radius of Petts Wood Railway station, as stated previously, the centre of Petts Wood is clearly identified as Station Square. This area has Conservation Area status and contains a GII listed building and a locally listed building. There are 2 other Conservation Areas in Petts Wood along with the ASRC. Conservation areas should not be destroyed or radically altered to fulfil these growth potential judgements, likewise the Petts Wood ASRC. These areas are fully developed. There is **no** scope for further future development as no empty building sites exist in Petts Wood.

We note that Petts Wood has been given the same ‘medium’ growth potential as Orpington. Yet Orpington is a much larger centre and has, possibly, far more growth potential than Petts Wood.

The ‘medium’ growth potential an incorrect judgement as far as Petts Wood is concerned. Petts Wood should be reclassified as **LOW**. Petts Wood has very limited potential for future residential growth.

User:	United Colleges Group (UCG)

The Group welcomes the ‘Town Centre First’ approach and the supporting clarification brought by Figure 2.18, which clarifies that educational uses would be acceptable in district and major centres where footfall is high and accessibility greatest.

User:	Natural England

It is our opinion that this policy could contribute to green infrastructure provision, by including measures to encourage the creation or enhancement of GI along cycling and walking routes.

Given that the plan encourages densification around areas with high levels of public transport provision, it is likely that maintaining and enhancing access to greenspace within these areas will be crucial. Following the examples presented by Greening the BIDs there are many opportunities for greening within town centre that can provide environmental benefits and support the local economy.

User:	Chairs of Camden's Conservation Area Advisory Committees

SD7 C We **object** to the designation of Camden Town as a Metropolitan Town Centre, at our submission on Annex 1. At this location (SD7 C) we note that the powers granted to the Mayor, and referenced in this policy, would allow the Mayor to act as planning authority in such areas, taking away planning powers from our local Council.

User: Aberdeen Standard Investments

Policy SD7 Town Centre Network

We welcome the recognition that the changing role of town centres should be proactively managed in relation to the town centre network as a whole.

Under Part D of the Policy Wimbledon falls within the category of major town centres which should be a focus for higher-order comparison goods retailing. Aberdeen Standard Investments supports the identification of such centres for securing opportunities for higher density employment, leisure and residential development in a high quality environment.
However, this should not be prejudiced by other plan policies which could result in the loss of such attractions to the benefit of the town centre as a whole.

User: Diagon Ltd, John Oughton and Bob Perdeaux

Town Centres

Our clients welcome the recognition that the Draft London Plan gives to the important role of town centres and their potential for delivering new housing through higher-density mixed-use or residential development. However, they consider that the Draft London Plan should provide explicit support for the identification of new town centres related to rail or underground stations where they can address deficiencies in the town centre network and promote the delivery of good growth. We suggest potential new town centres, including those indicated in the Bexley Growth Strategy, are indicated on a map in Annex 1. We also suggest the following modification to the relevant town centre policies:

Policy SD7 Town centre network

(Modify)

B. Identified deficiencies in the London town centre network ~~can~~ **should** be addressed by promoting centres to function at a higher level in the network, designating new centres (see Annex 1) or reassessing town centre boundaries (see Policy SD8 Town centres: development principles and Development Plan Documents). Centres with current or projected declining demand for commercial, particularly retail, floorspace may be reclassified at a lower level in the hierarchy.

(Insert)

C. **Boroughs should explore opportunities through the preparation of development plans and Opportunity Area planning frameworks to designate new town centres around Tube or rail stations to promote sustainable patterns of growth, the creation of new neighbourhoods and/or fully realise the growth and regeneration potential of Opportunity Areas.**

User:	Aberdeen Standard Investments

Table A1.1 Town Centre Network

We welcome the recognition of Wimbledon as:
a) An area with high potential for commercial growth (reflecting the opportunities for offices);
b) An area with high potential for residential growth (reflecting the opportunities for higher density development); and
c) An ‘A’ location in Figure A1.4: ‘Town Centre Office Guidelines’ as which has the capacity, demand and viability to accommodate new speculative office development.

User: HammersmithLondon

With careful investment and infrastructure, we believe that Hammersmith Town Centre has the potential to be upgraded from ‘major’ to ‘metropolitan’ centre. The centre already benefits from a high level of access to public transport (PTAL 6b and 6a), and acts as a major hub between inner and outer London.

Hammersmith Town Centre already meets many of the qualifying aspects of a Metropolitan Town Centre, as listed in Figure 2.18, and continues to grow. This growth should be carefully managed in line with draft Policy SD7 and the future potential of the centre recognised as a potential future change, and noted in Table A1.1.

In addition to this, Table A1.1 should also be amended to recognise the full growth potential and capacity. HammersmithLondon supports the ‘high’ level of residential development expected within the centre, but is disappointed that only a ‘medium’ level of commercial growth is anticipated. Whilst Hammersmith is a well-established centre with a large amount of existing commercial premises, it has strong potential for future growth in this area, particularly given the large amount of land that could be released through infrastructure projects, as outlined below. We therefore ask that the ‘commercial growth’ category for Hammersmith is amended to ‘high’.

User:	Sustrans
SD7 F Support the focus of providing convenient and attractive access by walking and cycling to local and neighbourhood centres.	

User:	Sustrans
We welcome walking and cycling as criteria by which town centres may be reclassified	

User: Sean Creighton

Policy SD7 Town centre network

37. Section E of this Policy discusses the need for the focus in district centres ‘on the consolidation of a viable range of functions, particularly convenience retailing, leisure, local employment and workspace’, etc.

38. Norbury is a District Centre along London Rd. In its evidence to the Croydon Local Plan (Partial Review) the LNPC accepted that there is scope for this approach. However, I have already pointed out in paras 7 & 8 how the Council has undermined the ability to achieve this.

39. Because it is the residents who understand the way in which District Centres are being changed by commercial landlords, developers, buy-to-let- landlords, the local community in District Centres must be involved in planning changes through a District or Neighbourhood Forum with the Council, TfL, transport operators, and local businesses.

40. A step in this direction is due to take place between the Norbury Councillors and LN and other local organisation on a voluntary basis, supported by a Council policy for devolution. However that policy could be reversed in the future as it is not based on a legislative foundation.

41. The Love Norbury Transport Committee is in discussion with the area Station Manager about the run down nature of Norbury Station and its linked estate. Regeneration of the Station is a key to carefully managed development and intensification of the District Centre. It is clear that unless Network Rail is provide with funding nothing will happen

42. The concept of detailed development plans as outlined for town centres in Policy SD8 (Town centres: development principles and

Development Plan Documents) should be required for District Centres. In relation to Croydon and Norbury these would go into more detail than the overview approach in the newly adopted Croydon Local Plan. The characteristics described in it for example of Norbury were changed in the light of some the comments of LNPC to strengthen the description.

43. Similarly the concepts in Policy SD9 (Town centres: Local partnerships and implementation) should be applied in District Centres).

User:	Lendlease
We fully support the upgrading of Elephant and Castle / Walworth Road from a District Centre to a Major Centre, which recognises the growing role of Elephant and Castle as a place to live, work and shop.	

User: Unknown

Our client supports Policy SD7 of the London Plan, particularly the need to identify deficiencies in the London town centre network by promoting centres to function at a higher level. Whilst our client's site is located within a designated Major town centre, it is a high performing and growing centre that continues to increase its retail, leisure and commercial offer and should therefore be considered for Metropolitan status.

The draft plan describes Metropolitan centres as serving wide catchments and typically containing at least 100,000 sqm of retail, leisure and service floorspace. These centres should have good accessibility, employment, leisure and service functions.

The draft plan states that Metropolitan centres can only be changed through the London Plan. For that reason, detailed below is the list of requirements for a Metropolitan centre together with justification for why Wembley should be awarded Metropolitan status:
• High order comparison retail
• Large shopping malls

• Town halls and civic buildings
• Larger offices
• Sub-regional culture, leisure and entertainment function

Wembley benefits from all of the above elements. Our client's site has more than 50,000sqm of commercial space; including over 20,000sqm of A1-A5 use, 25,000sqm of C1 Hotel Use and a 3,500sqm 9 screen cinema. A further 40,000sqm of mixed use commercial floor space will become available between 2018 and 2020. When completed, a total of over 100,000sqm of commercial space will be provided and the majority of this floor space will be provided within the Wembley town centre boundary. Furthermore, these figures only relate to our client's site and do not take into account the further commercial floor space provided on Wembley High Road and elsewhere within the Wembley Opportunity Area.

Since its opening in 2013, the London Designer Outlet (LDO) has been an extremely successful retail centre and is the only designer retail outlet within the M25, attracting over 6 million visitors a year for retail, leisure and work. The shopping mall benefits from the largest catchment density for any UK outlet centre as the London Designer Outlet is the nearest outlet centre for 5.8 million people.

Brent Civic Centre is situated on Engineers Way in the town centre and accommodates the headquarters of the London Borough of Brent. The building opened in 2013 and provides office space for over 2,000 Brent staff. The building provides the majority of the Council's services as well as acting as a community hub. The Civic Centre also includes a library, two cafes, entertainment spaces, meeting rooms and a garden used for weddings and ceremonies.

User: Standard Life Investments

Policy SD7 Town Centre Network

We welcome the recognition that the changing role of town centres should be proactively managed in relation to the town centre network as a whole with the designation of new centres being used to address deficiencies in the town centre network.

The policy notes that classification of major centres can only take place via the London Plan. Where Local Authorities have already undertaken extensive research and have provided justification for centres being designated as major centres they should be designated as such in the new London Plan. This new town centre will support growth and change in the Gallions Reach area.

The supporting text at paragraph 2.7.3 notes that:

"It is important that any changes or additions to the town centres network are supported by robust evidence, particularly looking at the wider impact on the network, informed by regular town centre health checks, and undertaken alongside reviews of town centre boundaries."

With regard to Gallions Reach Shopping Centre the Council recognised in its 2012 Core Strategy the longer term aspiration for it to become a Major Centre and this has been carried forward into its most recent draft of the Local Plan. Therefore Standard Life Investments considers that Gallions Reach should be allocated as a Major Centre in the London Plan in recognition of the long term aspiration of the Council, and ongoing work by our client to deliver a comprehensive redevelopment including residential development, and other town centre uses.

User: Standard Life Investments

Policy SD7(G) of the 2012 Core Strategy requires boroughs and other stakeholders to have regard to the broad policy guidelines for individual town centres in Annex 1. Table A1.1 (Town Centre Network) identifies that Gallions Reach has potential to be classified as a Major Centre in the future. Table 1 (below) provides a summary of the classification for Gallions Reach and the description of what this means for development going forwards.

Table 1: Gallions Reach

Future Potential Network Classification – Major	Typically found in inner and some parts of outer London with a borough-wide catchment. They generally contain over 50,000 sq m of retail, leisure and service floorspace with a relatively high proportion of comparison goods to convenience goods. They may also have significant employment, leisure, service and civic functions.
Commercial Growth Potential – Medium	Includes town centres with moderate levels of demand for retail, leisure or office floorspace, and with physical and public transport capacity to accommodate it.
Residential Growth Potential - High	All town centres have potential for residential growth, either within or on the edge of the town centre. Table A1.1 provides strategic guidance for the relative potential for residential growth for the International, Metropolitan, Major and District centres and CAZ clusters, indicating whether they would be likely to be able to accommodate high or medium levels of

Policy SD8 Town centres: development principles and Development Plan Documents

User:	London Cycling Campaign

Add to 4 c):
public transport and ***walking and cycling*** accessibility and capacity

Add to 4 d):
planned for or potential public transport ***and walking and cycling*** improvements

Add to 5 : and future public transport ***and walking and cycling*** provision

Add example e):
Delivering a high quality protected or off-road cycle route

User:	London Borough of Brent
The Council supports this policy.	

User: London Borough of Lewisham

We support SD8, especially in terms of fit out where we have some difficulty with developer push back. We will be reconsidering some of our town centre boundaries in our next Local Plan, in order to reflect changes in local character, current plans for development and development opportunities arising from Phase 2 of the BLE.

Further consideration should also be given to:

- Amending SD8 to ensure that ~~commercial~~ *all* floorspace relates to the size and role and function of a town centre.

Allowing more flexibility in retail floorspace, in line with the role and function of each centre.

User:	London Borough of Bromley

Whilst the sequential approach to town centre uses is supported, there are concerns about introducing residential development into out-of-centre retail and leisure parks due to the less accessible nature of these areas and their parking pressures.

User: London Councils

While the principals set out in this policy can be welcomed, it makes no reference to residential Permitted Development Rights which can enable commercial and other uses to be converted to residential use without a full planning process. These rights are having a harmful impact on available and affordable commercial space in London and can only be protected by Article 4 directions. It would be useful for the plan to allude to the impacts of these rights, and for the GLA to state that they will work with boroughs to ensure that impacts of Permitted Development Rights will be mitigated where possible. The GLA can also consider joining with boroughs to limit and reduce the impact and scope of Permitted Development Rights on office space.

The policy also encourages the redevelopment of retail and leisure parks to deliver housing intensification. While in many cases boroughs may find it beneficial to locate housing delivery in existing retail and leisure parks, it may not be suitable in all cases. The policy recognises that out-of-centre and edge-of-centre retail and leisure parks are often ‘low density and car dependent’ and locating housing in such locations is likely to increase car use. This prescriptive policy erodes boroughs ability to reject housing development in retail and leisure parks and the policy can be reworded to allow boroughs increased the flexibility to assess and identify suitable development sites for housing.

User: London Borough of Tower Hamlets

Part A.2 of the policy seeks to resist out-of-centre development of town centre uses in line with the sequential approach with limited exceptions for existing viable office locations in outer London. However, exceptions should be made for small shops serving day-to-day shopping needs in opportunity areas and site allocations which will accommodate significant residential / office developments and local evidence demonstrates that it will not harm the vitality and viability of a town centre in line with the NPPF.

Part A.2 is not sufficiently aligned with the principles set out in policy E9 (retail, markets and hot food takeaways) which permits small shops in large scale commercial developments outside of town centres and supports A1 retail uses within areas which are under-served in local convenience shopping and related services and support additional facilities to serve communities. In addition, policy E9 should make it clear that small shops will be permitted in large mixed-use developments including residential not just commercial uses.

As drafted, part 3 of the policy and the supporting text (paragraph 2.8.2) is not wholly consistent with paragraph 267 of the NPPF. Part A.3 implies that impact assessments are required on all proposals involving town centre uses which are not in accordance with the development plan, as opposed to developments over the 2500 square metre floorspace threshold. Is this a deliberate variation and if so, what is the justification?

The terminology is confusing. Part B.3 requires local authorities to develop policies for the edge and fringes of town centres. In the context of the sequential test, the edge of centre is defined as a location that is well connected and up to 300 metres of the primary shopping area, which contains both primary and secondary shopping frontages. However, the next part of the policy refers to secondary frontages. Clarity is required on what areas should be the focus.

Parts 4 to 6 – greater intensification of town centres is supported but in many cases detailed masterplans and strategies will be required to carefully coordinate mixed-use intensification of activity within these locations. Again, further guidance on how these masterplans should be prepared would be particularly welcomed, including a clearer steer on how the GLA will support local authorities in this process.

User:	Old Bermondsey Village Neighbourhood Forum

Policy SD8 B 1) should be reconsidered to encourage boroughs to think less about town centre boundaries as an in-or out tool and more as a threshold zone where detailed consideration of the local context should be encouraged through meaningful community consultation. In terms of building height issues for example, overall contour maps (which can also be informed by consultation) from “centre” to periphery as such may be more appropriate and avoid town centre boundaries laying waste to / making a mockery of conservation areas.

User:	Royal Borough of Kingston

In general, RBK supports the policies on Town Centres (SD6-SD9) identified in the chapter and agrees with their classification. As noted in relation to the policies within chapter 6, RBK is concerned about the loss of employment and economic land to other uses, such as housing, and consider that the policies undermine the aim of growing the borough's economic offer. RBK suggests the approach is amended to identify the potential of town centres to provide housing, whilst also recognising that individual boroughs may take a more restrictive approach in order to protect and enhance a Town Centre's economic function.

User: HFFTRA

Policies SD6, Town Centres, SD7 Town Centre Network, SD8 Town Centres, development principles and DPDs , SD9 Town Centre Partnerships and

implementation

We have concerns about such a large amount of policy being focus on Town Centres, especially when increasing amounts of shopping is being done online.

Our concerns are the predominance of global stores and cafes; the viability of so many town centres being in close proximity to others, loss of local character and loss of shops, services, local markets and amenities that meet local needs and which are more likely provide employment to local people.

User:	London Borough of Hillingdon
As noted above, the Council welcomes policies that support the role and function of strong town centres, however these policies are too prescriptive and cannot be practically applied in decision taking. As such, they should be removed from the plan.	

User:	London Borough of Hackney

Hackney supports the continuation of the sequential town centres first approach. In line with the criteria of Part B of this policy, Hackney has defined the extent of town centre boundaries and primary and secondary shopping frontages, and made changes to these where necessary through the LP33.

It is noted that the London Plan suggests that Impact statements should be undertaken in situations where over of 2500sqm of retail, leisure and office floorspace is proposed outside of a town centre. In line with the NPPF, the policy should enable boroughs to set their own local thresholds.

User:	Westminster City Council

Guidance on the design of out of centre housing developments in paragraph 2.8.4 does not relate to policy on town centres and so does not belong here.

User:	London Borough of Southwark

In principle the council supports the town centre first approach with regard to proposals for town centres to encourage a concentration of these uses and enliven existing and new town centres. Part A2 of the policy sets a strong resistance to out-of-town retail development and Part A3 requires an impact assessment for any edge of centre of out of centre development of town centre uses. It is considered that in the CAZ or the CAZ fringe, town centre uses may also be appropriate to service a central London function, and this should be acknowledged within the policy to maintain consistency with the CAZ policies.

User: London Borough of Redbridge

The Council strongly supports this policy and the “town centres first” approach, and in particular is actively pursuing the designation of land within criteria B 5) for residential led mixed use developments. The Council would support active collaboration between the GLA and major retail and leisure operators / landowners to encourage and facilitate the residential-led redevelopment of low density supermarkets, car parks, and leisure / retail parks, whilst retaining and providing for identified needs in commercial floorspace.

Section 4 of the policy needs to include a criterion on the availability of social infrastructure to support intensification in town centres. This is essential if sustainable neighbourhoods are to be secured for our residents. It’s an existing concern only to be heightened if the borough’s town centres are expected to deliver the growth targets identified in this plan.

However, the policy is silent on waste collection servicing and how this would work given the proposals to intensify town centres and the contribution small sites will play in increasing housing delivery. As the majority of the Plan’s proposed growth will be located within town centres, the policy needs to address essential issues such as waste collection and broader site servicing.

User:	London Borough of Wandsworth
Criteria A1 can be read to offer limited flexibility regarding areas that the sequential retail approach is applied. If local evidence determines that an alternative area is suitable then this should also be appropriate.	

User:	London Borough of Harrow
The Council supports this policy.	

User:	London Borough of Richmond Upon Thames

Support for the policy’s firm stance on out of centre development. Support for B 3) which recognises that diversification should be encouraged where there is surplus floorspace and the need to take account of local circumstances.

User:	Royal Borough of Greenwich

We are pleased to note that the draft Plan aligns with our aspiration for Woolwich to be reclassified as a Metropolitan Town Centre in the future. We also support the requirement to realise the full potential of existing out of centre retail parks to deliver housing, and this is an approach that we’re already pursuing in Charlton Riverside. Overall, the approach to town centres in policies SD6 to SD9 is comprehensive and effective and we welcome this more holistic approach.

User: London Borough of Havering

Criteria A (4)

The draft London Plan says that boroughs should realise the full potential of out of centre retail parks to deliver housing growth, and connect to public transport networks.

The draft London Plan should recognise that edge of town or out of town centres such as those in Outer London (including those in Havering) are successful because they have extensive and free car park provision. If this were reduced not only would they be in danger of reducing their competitiveness they may also start to compete with the recognised town centres some of which are clearly already struggling.

User:	Royal Borough of Greenwich

SD8A(4)

Support the redevelopment of existing out of centre retail and leisure parks to deliver housing intensification.

User:	Marble Arch Partnership

We support the approach taken by Policies SD6 to SD8 although we question why the growth potential and the night time economy cluster have both been downgraded for our area that the plan recognises as the Edgware Road South centre. We have well over 100 eating out venues in our area, including a renowned concentration of restaurants offering a wide range of Arabic cuisines which attracts people from all over London and from overseas, particularly during the summer.

User:	London Borough of Newham

LBN are generally supportive of the policy which is complementary to Newham's Draft Revised Local Plan.

However, Para A.4 should provide more flexibility by recognising other forms of intensification of retail parks may be appropriate in some cases where supported through Local Plans, (e.g. to help alleviate pressure on employment land) recognising for instance, that not all are in sustainable locations for residential development absent significant transformations in public transport accessibility.

User:	John Innes Society
we broadly support these policies.	

User: TUC London, South East and East of England

Policy SD8: Town Centres

1. There are pieces of community infra-structure that are core to the functioning of a community such as Post Offices, libraries and banks. The Post Office has a programme of the closure of offices and disposal of buildings, which is detrimental to cohesive town centres and especially to the level of services enjoyed by those people who are less-well off or less-connected to the digital realm. Such public assets should be defended by the planning system.

User: Just Space

[See general comments on SD6 - SD9 - saved under SD6]

SD8 Town centres: development principles and Development Plan Documents (changes noted in **bold**)

Policy SD8 – proposed additions

1. Development Plans and development proposals should take a town centres first approach by:
    1. adopting a sequential approach to accommodating town centre uses including **industrial**, retail, commercial, offices, leisure, entertainment, culture, tourism and hotels such that new development of these uses is focused on sites within town centres or (if no sites are available, suitable or viable) on sites ***[Delete: on the edges of centres]*** that are, or can be, well integrated with the existing centre, local walking and cycle networks, and public transport
    2. firmly resisting **large scale** out-of-centre development of town centre uses in line with the sequential approach in A(1) above, with limited exceptions for existing viable office **and industrial** locations in outer London (see Policy E1 Offices) **and exceptions for town centre at edges of centres where town centre boundaries could be extended**
    3. providing an impact assessment on proposals for new, or extensions to existing, edge or out-of-centre development for town centre uses in part A(1) above that are not in accordance with the Development Plan
    4. realising the full potential of existing out of centre retail and leisure parks to deliver housing **and economic** intensification through redevelopment and ensure such locations become more sustainable in transport terms, by securing improvements to public transport, cycling and walking. This should not result in a net increase in retail or leisure floorspace in an out-of-centre location having regard to parts A(1), (2) and (3) above **but an increase in industrial floorspace is acceptable**.
2. In Development Plans, boroughs should:
    1. **define the detailed boundary of town centres in policy maps including the overall extent of all non-residential uses in the extent of the town centre and adjacent areas, including all high streets, industrial areas, primary shopping areas, primary and secondary frontages and night time economy. Some town centres may be fragmented (e.g. where pockets of secondary frontage or non-residential uses inside blocks are separate from the main town centre boundary). Areas containing only housing should not be included in town centre boundaries.**

- **Champion high streets as social, civic and cultural infrastructure. High streets are convenient locations for traditional social infrastructures but are also perceived as social infrastructure in their own right. It is essential to understand the spectrum of social functions better so that growth on high streets does not undermine, but rather maximises this**

- **Champion high streets as public spaces. Development on high streets should recognise the role of high streets as public spaces for congregation and cultural exchange, as accessible and connected places, and as locations for night-time activity.[1]**

1. develop policies for the edge and fringes of town centres, ***[Delete: revising the extent of shopping frontages where surplus to forecast demand and]*** introducing greater flexibility **between non-residential uses**, permitting a range of non-residential uses particularly in secondary frontages taking into account local circumstances but firmly resisting residential use at ground floor
2. identify centres that have particular scope to accommodate new commercial development and higher density housing, having regard to the growth potential indicators for individual centres in Annex 1 *[comment on this: without accurate data on what is there in town centres, the Annex 1 indicators are insufficient, so additional criteria added below that town centres must be properly audited]*

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

1. **an audit and assessment, with public consultation, of the contribution of existing retail, office, commercial, industrial and cultural activities to the local community and wider London communities to provide a baseline to prevent displacement of existing valued uses**
2. assessments of demand for retail, office and other commercial uses
3. assessments of capacity for additional housing **on higher floors of buildings above non-residential intensification**
4. public transport accessibility and capacity
5. planned or potential transport improvements – to indicate future capacity for intensification
6. existing and potential level of density of development and activity
7. relationship with wider regeneration initiatives
8. vacant land and floorspace – as a further measure of demand and also of under-utilisation of the existing centre **although in central London Boroughs this is likely to be negligible**
9. potential to **protect, enhance and** complement local character, **including social and economic character,** existing heritage assets, **existing ethnic and socially specific assets,** and improve the quality of the town centre environment.
10. viability of development.

11. **Potential for strengthening existing local civic and economic activities**

1. identify sites suitable for higher density mixed-use residential intensification **with non-residential uses at ground level** capitalising on the availability of services within walking and cycling distance and current and future public transport provision including, for example:
    1. comprehensive redevelopment of low-density supermarket sites, surface car parks, and edge of centre retail/leisure parks **to include intensification of economic and civic uses as well as provision of housing**
    2. redevelopment of town centre shopping frontages that are surplus to demand **into adaptable types to accommodate different non-residential uses**
    3. redevelopment of other low-density town centre buildings that are not of heritage value, particularly where there is under-used space on upper floors, whilst re-providing **and increasing by 50%** non-residential **uses and floorspace** *[This seems too simplistic, and needs unpacking. The first step should be to assess why upper floors are no being properly used and see if steps can be taken to get them well-used]*
    4. delivering residential above existing commercial, social infrastructure and transport infrastructure uses or re-providing these uses **at ground floor** as part of a mixed-use development.
    5. support flexibility for temporary or 'meanwhile' uses of vacant properties **which exclude temporary use as residential**.
    6. **conduct a complete audit of all non-residential accommodation; internal and external floorspace; and jobs in the borough prior to preparation of local plans, and prior to defining town centre boundaries**
2. Development proposals should:
    1. ensure that commercial, **industrial and office** floorspace relates to the size and the role and function of a town centre and its catchment **and ensure accommodation and local policy are sufficiently adaptable to absorb a range of non-residential uses**
    2. ensure that commercial, **industrial, office and all non-residential** space is appropriately located having regard to Part A above, fit for purpose, ***[Delete: with at least basic fit-out]*** and not compromised in terms of layout, street frontage, floor to ceiling heights and servicing, and marketed at rental levels that are related to demand in the area or similar to surrounding existing properties. **If non-residential properties lie vacant fit out should be improved and rent reduced**
    3. ***[Delete: support efficient delivery and servicing in town centres including the provision of collection points for business deliveries in a way that minimises negative impacts on the environment, public realm, the safety of all road users, and the amenity of neighbouring residents]***

4. support the **social, civic and economic** diversity of town centres by providing a range of ***[Delete: commercial]*** unit sizes, **located appropriately within the block at ground floor level**, particularly on larger-scale developments **and on developments on arterial roads which have potential as high streets**.

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

User:	London Borough of Bexley

Part C(4) of **Policy SD8 Town centres: development principles and Development Plan Documents** should be revised to reflect local circumstances, for example, where there is a shortage of larger units in a town centre. See also comments about **Policy E9 Retail, markets and hot food takeaways** in the Council's response to **Chapter 5**.

User:	Federation of Small Businesses

We support the strong tone on the issue of out of town developments in point (2). Out of town shopping centres impact on local high streets, particularly through free parking measures.

Freight and logistics companies must be able to deliver goods and provide services to town centres at a time when required by the business and accessible in relevant and appropriate locations.

User:	Federation of Small Businesses

Whilst parking policy is not a ‘flavour of the month’ area for this administration – it is important to remember that the availability of parking facilities for customers is critical to the success of high streets and particular types of businesses. This must receive due consideration if we are to maintain inclusive high streets.

5) Whilst the drive to reduce the dependence on car usage is understood, the need for loading bays and parking for service operators, maintenance and repair traders is vital to maintaining the vitality of a town or local centre.

User:	Federation of Small Businesses

Ensuring that we have a mix of independent businesses and not just chain shops are critical to London’s economy. Landowners must be forced to break down units to enable small commercial units to take a place in London’s economy – as these will be the medium sized businesses of the future – and are not simply looking to use a shop front as a pure way of large business brand recognition/marketing (whilst they make a loss at the same time).

User: Kingfisher PLC

Role for Larger Stores in Mixed-Use Sites

We are supportive of the principle of increasing mixed use sites, including a combination of retail and residential provision.

With our smaller-format stores (Screwfix and our smaller format B&Q stores), we have successfully incorporated the store within mixed-use residential sites. Our examples include: B&Q City on Holloway Road and Screwfix in Battersea, Kensington, Fulham, Welling, Tooting and Lewisham. As part of our new store opening approach, our teams engage with local residents and the wider local community to alleviate any concerns about noise and disruption during the fit-out of the store, deliveries and during trading hours.

We are eager to explore opportunities to combine our larger B&Q format stores within mixed-use sites but have not found that developers have had the desire to explore this opportunity with us in the past. **To encourage developers to opt for a combination of larger stores and residential properties within a mixed-use site, the Plan should include policies to support the retention of retail floorspace through integration with mixed-use residential sites.**

It is encouraging that the Deputy Mayor wants to explore mixed-use opportunities beyond the model of combining high-rise accommodation with a convenience supermarket on the ground floor – we would be prepared to outline in more detail how we might see a larger B&Q store being incorporated into a mixed-use site with residential properties in practice.

Redevelopment of Retail Parks: Provision to retain the last home improvement store within a district

Kingfisher recognises the fast pace of transformation in the retail sector owing to changes in consumer habits, including the trend towards more smaller convenience outlets in central locations. In our response to this trend, we last year opened our first B&Q City Format store in the UK on the Holloway Road, which focuses on convenience purchases of individual products.

While we are evaluating the success of this store and see the potential for opening additional smaller sites within the CAZ and within Metropolitan and Major centres in the near future, there is still a role for larger sites in out-of-centre retail parks as previously stated. Ultimately there is a balance to be achieved between convenience and project-based purchases within the capital, with specific roles for stores of all sizes to play alongside our digital offer.

While we acknowledge that there is a surplus of comparison goods retail space in retail parks within certain district centres, we do not believe that there is a blanket surplus of home improvement stores (categorised as stores specialised in the ‘maintenance and repair of the dwelling’) in London. To the contrary, we believe there is currently a lack of home improvement stores in the capital compared with other UK cities, which is why we have an objective to expand our presence in the Capital.

We therefore believe the London Plan should include provisions for boroughs to consider their comparison goods retail provision in greater detail to ensure that they will not risk a lack of access to any one type of provision in particular (be it home improvement or another kind of comparison goods retail such as clothing or electronic goods). **We believe that the Plan should include provisions for the final store within the relevant category of comparison goods retail in the district to be protected.**

We do not oppose the principle to not to increase retail floorspace in retail and leisure parks where this space can be used to deliver housing intensification and a surplus of comparison goods retail can be proven. However, Policy SD8 should also provide provision for the existing retail floorspace to be retained where required within the retail park – either in isolation or within a mixed-use site.

User:	Ministry of Housing, Communities & Local Government

The NPPF includes clear policies in relation to Town Centre uses, including at para 24 a sequential test. Part A2 of the policy is unclear and appears to go beyond that sequential test by using wording that is more restrictive “firmly resist”.

User:	Business for London

Town centres. Town centres‘ role is changing. Policies need to change to ensure they remain attractive places for residents and to a wider range of businesses, and not just retailing. The Plan introduces some interesting policies that should ensure that town centres continue to be at the centre of community life in London in the future. The focus on purely retail uses needs to diminished to allow a wider range of businesses (including many more that are customer facing) to locate in town centres, especially in secondary and tertiary shopping streets.

User: Silvertown Homes

Part B of the policy refers to ‘firmly resisting’ out of centre development. The NPPF only seeks compliance with the sequential test.

We suggest a different approach should be taken when determining when the sequential test is referred to across London. A site’s suitability for development for town centre uses will often be dictated by its accessibility by sustainable modes of transport rather than whether or not it happens to be located in a designated town centre.
Most visitors to offices are staff who make the same journey regularly and can be encouraged towards the use of sustainable methods of transport. It will almost always be the case at sites with a PTAL rating of 4 or higher that travelling by more sustainable modes of transport should exert more appeal than private motorised vehicles. Car parking provision will influence behaviour.

As Policy E10 also acknowledges, appropriate locations for hotels include town centres but also ‘within Opportunity Areas where they are well-connected by public transport, particularly to central London’.

User: Elaine Chambers

Policies SD6, Town Centres, SD7 Town Centre Network, SD8 Town Centres, development principles and DPDs , SD9 Town Centre Partnerships and implementation

We have concerns about such a large amount of policy being focus on Town Centres, especially when increasing amounts of shopping is being done online.

Our concerns are the predominance of global stores and cafes; the viability of so many town centres being in close proximity to others, loss of local character and loss of shops, services, local markets and amenities that meet local needs and which are more likely provide employment to local people.

User: Royal London

Policy SD8 – Town Centres: development principles and Development Plan documents

RL welcome and support the key objectives of this policy and currently hold a number of retails parks including within the London Borough of Hammersmith and Fulham; and Lewisham which are currently under development or could in the future align with the objectives of this policy to support higher density development intensifying the use land and bringing forward residential housing.

In relation to retail uses more generally it must be recognised that the retail and consumer market is dynamic and rapidly changing and we would therefore advise against unduly prescriptive policies on this matter. For instance, ‘no net loss of retail or leisure’ floorspace is inappropriate.

User:	Historic England

We support the following references:

Part B, 4) criteria for assessing potential for intensification include

h) potential to complement local character, existing heritage assets and improve the quality of the town centre environment

5) c) redevelopment of other low density town centre buildings that are not of heritage value

5) d) delivering residential on upper floors

User: Royal London

Policy SD8 – Town Centres: development principles and Development Plan documents

RL welcome and support the key objectives of this policy and currently hold a number of retails parks including within the London Borough of Hammersmith and Fulham; and Lewisham which are currently under development or could in the future align with the objectives of this policy to support higher density development intensifying the use land and bringing forward residential housing.

In relation to retail uses more generally it must be recognised that the retail and consumer market is dynamic and rapidly changing and we would therefore advise against unduly prescriptive policies on this matter. For instance, ‘no net loss of retail or leisure’ floorspace is inappropriate.

The proposal to increase the carbon offset amount to £95 per/tonne is cumulatively with other development requirements identified within the Draft Plan contrary and likely be a significant obstacle to achieving the growth set out in the document. It is appropriate that development in its construction and performance is sustainable and energy efficient. However, the requirements of this policy go significant beyond this placing an undue obligation and financial pressure on development and failing to have regard to the many positive aspects that development can bring.

Whilst the GLA may suggest that viability can be referred to this is a costly process with no certainty in relation to the outcome. The effect of this and other requirements is to in many cases prevent development proposals (which may better optimise the use of land) coming forward at an early stage given the risk and planning requirements of this option versus management of the existing asset in its present or upgraded condition.

RL consider that there should be no financial contribution beyond the onsite target reductions set out in the policy for major development.

User:	Living Streets
We support policy SD8.	

User:	Federation of Master Builders

Town centres have a crucial role in the social, civic, cultural and economic lives of Londoners. The draft London Plan takes a strong town centre first approach. We welcome under SD8 point B4(b): ‘Assessments of capacity for additional housing.’ However we feel that the contribution that better use of the existing building stock in and around town centres to deliver the draft London Plan’s housing targets should be given greater consideration.

User:	John Lewis Partnership

Summary and key recommendations

- **Boroughs should be encouraged to identify low density retail sites for higher density mixed use intensification schemes and to support such development** above shops, as discussed in policy SD8. We also support the emphasis on design in delivering high density flexible schemes.

User:	London Borough of Sutton

OBSERVATION. The London Borough of Sutton supports Policy SD8 - Town Centres: Development Principles and Development Plan Documents but considers it an unnecessary policy. Much of what is stated in the policy is basic, sound planning or repeated from national policy and guidance. The Council considers that these are not strategic matters which are best devolved to the local level which has a better understanding of the context to deal with detailed local matters (similar comments apply to Policy SD9).

User:	Elephant & Castle Properties Co Limited

Policy SD8 – Town centres: development principles and Development Plan Documents. We generally support this policy, however, as referenced at SD8(C)2), it is not relevant nor within the planning system's remit to dictate rental levels of commercial space – this is a market consideration. This text should be deleted in its entirety.

User: Brent Cross Cricklewood Development Partners

Part A(1) of Policy SD8 considers that Development Plans and proposals should take a town centres first approach by: adopting a sequential approach to accommodating town centre uses such that new development of these uses is focused on sites within town centres or (if no sites are available, suitable or viable) on sites on the edges of centres that are, or can be, well integrated with the existing centre.

Part A(2) of the policy goes on to state this approach should be followed by: “firmly resisting out-of-centre development of town centre uses in line with the sequential approach in A(1) above, with limited exceptions for existing viable office locations in outer London (see Policy E1 Offices)”

Paragraph 24 of the NPPF deals with the location of town centre uses and states local planning authorities should require applications for main town centre uses to: *“be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. When considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre”.*

The NPPF recognises that out of centre development will be acceptable where it is determined that no town centre or edge of centre sites exist. The wording of Policy SD8 goes beyond the tests of the NPPF at paragraph 24 by stating that development should be ‘firmly resisted’. The policy therefore needs to be updated if it is to be consistent with national policy, as required by paragraph 182 of the NPPF.

User: Aitch Group

My client supports the proposed sequential approach to provision of town centre uses. The policy should make it clear that the requirement to arbitrarily reprovide employment/ commercial floorspace in out of centre locations should be resisted particularly if the location cannot be accessed by public transport and relies primarily on private car trips.

This policy should make it clear that development in town centres should be of at least five storeys, unless it can demonstrated that it causes significant adverse impacts on neighbouring amenity or heritage assets. Boroughs should not refuse planning permission on design grounds reflecting subjective judgements, where it can be demonstrated that the proposal accords with design principles set out within the development plan and/ or there are no significant objections from design officers or borough appointed design review panels.

User: Lidl UK GmbH

In line with comments made above in relation to Policy SD6, Lidl supports the contents of Part C(4) of Policy SD8 which requires a range of commercial unit sizes. Lidl considers it helpful if the requirement in C(4) takes into account identified needs.

Part A of Policy SD8 aims to set out the general development management context for retail and other main town centre uses. Parts (1) and (2) provide the required reference to the sequential and impact tests, although Lidl considers the wording of the policy could be improved for clarity.

In particular:

- Part (2) gives the impression that no out of centre retail development will be permitted. Clearly, such an approach is contrary to the NPPF and this part of the policy should be reworded to indicate that out of centre proposals will be resisted only where there are suitable and available sequentially preferable in-centre, edge of centre and more accessible and better connected out of centre sites and premises.
- Whilst Lidl do not wish to comment on the residential land use aspects of Part (4), the imposition of a bar to net increases in retail and leisure floorspace in out of centre locations is contrary to the NPPF. The policy should be revised to allow for net increases in retail and leisure floorspace where they accord with the sequential and impact tests.

Lidl is supportive of the general principles in Part 5 of SD8, although wishes to repeat its comments at Policy SD6 whereby mixed use residential intensification proposals should not lead to the loss of opportunities to provide a range of retail unit sizes in locations which capitalise on the availability of services within walking and cycling distance of current and future public transport provision.

Lidl considers that the reference to the ‘sequential approach’ in the Glossary should be revised and expanded in the following ways:

- Whilst Lidl appreciates that the existing text in the Glossary introduces the general principles of the sequential approach for all relevant land uses, the text needs to be expanded to acknowledge that out of centre locations may also be suitable in instances where there are no suitable and available in-centre or edge-of-centre sites and premises.
- Clarity is also needed in relation to what makes an in-centre location – i.e. sites and premises within the defined Primary Shopping Area in each ‘town centre’.

User:	Aberdeen Standard Investments

Policy SD8 Town Centres: Development Principles and Development Plan Documents

We support the content of Annex 1, as referred to in part (4) of this policy which identifies Wimbledon explicitly in Table A1.1: Town Centre Network as having particular scope to accommodate new commercial development and higher density housing.

User: Glass and Glazing Federation

GGF response to Policy SD8, part 2.8.4

- The GGF agrees that new commercial developments and mixed-use developments should contribute to welcoming streetscapes through the provision of ground floor windows.
- Given the commitments to reducing energy bills and making London a zero carbon city, the London Plan should require any windows installed for aesthetic reasons on commercial buildings also exceed energy efficiency targets.

User:	Sustrans

SD8 A1 & 2

We welcome the focus for boroughs to identify sites by capitalising on the availability of services within walking and cycling distances and current and future public transport provision.

SD8 C 3

We welcome the requirement for the provision of business delivery collection points to facilitate the consolidation of goods helping to reduce motor -vehicle traffic.

User: Redrow Homes London Division.

Part B of the policy refers to ‘firmly resisting’ out of centre development. The NPPF only seeks compliance with the sequential test. We suggest a different approach should be taken when determining when the sequential test is referred to across London. A site’s suitability for development for town centre uses will often be dictated by its accessibility by sustainable modes of transport rather than whether or not it happens to be located in a designated town centre. In this context and as a case study, the Royal Borough of Kensington and Chelsea (RBKC) applies a nuance to the NPPF in its approach towards office uses. Its policies direct office development towards town centres but also to designated locations (locally designated Employment Zones in this instance) and any location with a PTAL rating of 4 or higher.

Most visitors to offices are staff who make the same journey regularly and can be encouraged towards the use of sustainable methods of transport. It will almost always be the case at sites with a PTAL rating of 4 or higher that travelling by more sustainable modes of transport should exert more appeal than private motorised vehicles. Car parking provision will influence behaviour.

As Policy E10 also acknowledges, appropriate locations for hotels include town centres but also ‘within Opportunity Areas where they are well-connected by public transport, particularly to central London’.

RECOMMENDATION:

Where the London Plan describes the sequential test it must accord with the NPPF. To achieve strategic targets the draft London Plan should consider applying the same approach to town centre uses as RBKC use for office uses.

We also recommend that the same clarification regarding Opportunity Areas with respect to hotels is carried across for all town centre uses.

We also suggest that this policy also makes it clear that the Mayor will also support higher density office development in accessible locations near transport hubs, even if not defined as
a “centre”.

User: Sean Creighton

Policy SD7 Town centre network

37. Section E of this Policy discusses the need for the focus in district centres ‘on the consolidation of a viable range of functions, particularly convenience retailing, leisure, local employment and workspace’, etc.

38. Norbury is a District Centre along London Rd. In its evidence to the Croydon Local Plan (Partial Review) the LNPC accepted that there is scope for this approach. However, I have already pointed out in paras 7 & 8 how the Council has undermined the ability to achieve this.

39. Because it is the residents who understand the way in which District Centres are being changed by commercial landlords, developers, buy-to-let- landlords, the local community in District Centres must be involved in planning changes through a District or Neighbourhood Forum with the Council, TfL, transport operators, and local businesses.

40. A step in this direction is due to take place between the Norbury Councillors and LN and other local organisation on a voluntary basis, supported by a Council policy for devolution. However that policy could be reversed in the future as it is not based on a legislative foundation.

41. The Love Norbury Transport Committee is in discussion with the area Station Manager about the run down nature of Norbury Station and its linked estate. Regeneration of the Station is a key to carefully managed development and intensification of the District Centre. It is clear that unless Network Rail is provide with funding nothing will happen

42. The concept of detailed development plans as outlined for town centres in Policy SD8 (Town centres: development principles and

Development Plan Documents) should be required for District Centres. In relation to Croydon and Norbury these would go into more detail than the overview approach in the newly adopted Croydon Local Plan. The characteristics described in it for example of Norbury were changed in the light of some the comments of LNPC to strengthen the description.

43. Similarly the concepts in Policy SD9 (Town centres: Local partnerships and implementation) should be applied in District Centres).

User: Sainsburys Supermarkets Ltd

Policy SD8 A 2

Sainsbury's object strongly to Policy SD8 A 2 of the DLP. This states that development plans and development proposals should adopt a town centre first approach by: "Firmly resisting out-of-centre development of town centre uses in line with the sequential approach in A(1) above…"

This approach is contrary to the provisions of the National Planning Policy Framework (NPPF), most notably paragraph 24. The proposed statement adds a higher threshold or barrier to development than advocated by the NPPF. The NPPF does not imply that out-of-centre development should be "Firmly resisted", only that the proposal should comply with the sequential approach. As such, this draft policy is not consistent with national policy and is not sound.

Policy SD8 A 1 sufficiently addresses the provisions of the sequential test in accordance with the NPPF. No additional protection is necessary or justified. Policy SD8 A 2 should, therefore, be deleted.

User: Sainsburys Supermarkets Ltd

We fully support the DLP's aspiration to realise the full potential of existing out-ofcentre retail and leisure parks to deliver housing intensification through mixed use redevelopment. As mentioned previously, Sainsbury's has already adopted this approach through its delivery of key sites such as Nine Elms and Fulham Wharf demonstrating the significant levels of housing which can be realised and their ability to act as a catalyst for regeneration.

However, it is essential that there must be a wider recognition that existing stores are trading businesses. At present the DLP does not reflect this crucial point.

Sainsbury's operate busy trading stores on sites referred to by SD8 A 4. Any redevelopment of these sites results in lost and disrupted trade. This is fundamental starting point for Sainsbury's which must be taken into account in the viability assessment for development. There is a significant operational cost to Sainsbury's associated with the redevelopment of an existing store, as a result of either temporary closure or severely compromised operation during the construction phase. This represents a significant initial cost to the business and risks the permanent loss of customers. This is particularly true in London's competitive retail market.

In this context, a key barrier to redeveloping many of Sainsbury's existing stores is the cumulative impact of planning contributions on viability. These include - but are not limited to - affordable housing delivery, CIL contributions and infrastructure improvements. In addition, Policy T6 I prescribes a reduction in retail car parking through site redevelopment. This will further hamper viability and we deal with this in more detail below. The cumulative impact of potential contributions, loss of car parking and loss of trade often makes the 'do nothing' option the most sensible for Sainsbury's whose primary business is retail.

To date Sainsbury's redevelopment schemes have been made possible through a pragmatic and realistic approach by local authorities and the GLA when considering viability matters which impact upon issues such as contributions and affordable housing provision.

Policy SD8 A 4 must recognise and make provision for this

User:	Cross River Partnership

We fully support the commitment to the Town Centres First Approach, as realised via the sequential approach with accompanying impact assessments. For Outer London, this is particularly important as Out-of-Town development can significantly damage the viability of nearby centres, undermining ambitions to improve opportunities for local walking, cycle networks and public transport. In an era where digital technology has grown in influence, there are limits to the amount of physical retail that can be sustained. Town centre retail must be established as a priority.

User: Workspace Providers Board

Design and management (Policy E3 Part D and Policy SD8 part C 2)

We note that mixed-use developments can include ground-floor non-residential spaces to make a nod towards existing planning policy, without being particularly well-considered. We support the general Policy SD8 Part C 2) which seeks to ensure that non-residential space is appropriately located, designed and marketed at realistic rents.

Design problems with affordable workspace might include the configuration of space as well as the wrong specification or absence of amenities. They might also arise from the over-specification of spaces by ambitious promoters supported by architects before a workspace provider is engaged.

We support Policy E3 Part D which encourages workspace providers are engaged at an early stage. The early engagement of workspace providers in the design and delivery of new affordable workspace is highly effective in bringing forward spaces with an appropriate specification for the target beneficiaries (users). However to ensure the effectiveness of the intent of this policy we believe workspace providers should also be “retained”.

User:	Oneill Homer
SD8B Neighbourhood plans (especially business-led) allow for detailed decisions on town centre boundaries to be made based on very local intelligence and trade-offs.	

User: Unknown

Our client supports Policy SD8 of the draft plan. They support the town centres first approach but recognise some town centre uses can be acceptable on the edge of town centres as long as they do not take competition away from the centre.

Furthermore, our client supports the comprehensive redevelopment of low-density retail and leisure parks and surface car parks in town centres or edge of centres to deliver housing intensification. It is important to make the best use of land, especially in Opportunity Areas where there is increasing pressure and demand to deliver new mixed-use developments.

User: Standard Life Investments

Policy SD8 Town centre: development principles and Development Plan Documents

We welcome the approach set out in Policy SD8(A4) with regard to encouraging Local Authorities to consider the potential of retail and leisure parks to deliver housing intensification through redevelopment. However, this should not be at the cost of the effective and efficient operation of the retail park in the short and medium term.

Also, the introduction of new uses such as residential should not prejudice the operation of existing uses for example because of amenity concerns arising from deliveries. It is essential that the GRSP Park retains the flexibility to undertake short and medium term assessment management initiatives in order to be able to respond to changes in the market and tenant demand.

Work is currently being undertaken on preparing a masterplan to consider the future residential development potential of the site and surrounding area, improved transport accessibility and an increased mix of uses. Flexibility is required in order to ensure that the park remains robust whilst this work is being undertaken. This will ultimately ensure that when the future development comes forward it is supported by a strong retail offer an essential base for the evolution into a major town centre. The Plan needs to be sufficiently responsive and flexible in order to ensure that the development of the new major centre is not unduly delayed. The supporting text at paragraph 2.8.3 recognises the need for flexibility stating that:

"*This should not generally result in an increase of retail or leisure floorspace, taking account of the town centres first approach, the sequential approach to town centre uses, and impact assessments where appropriate. Some edge-of-centre retail parks may be appropriate for a wider range of employment uses, subject to sequential testing and impact assessment.*"

This flexibility should be included in the policy to ensure that asset management initiatives can be brought forward including where these may involve an increase in retail and associated uses floorspace in order to ensure continuing competitiveness and providing a strong basis upon which to serve existing and future residents.

These changes should be recognised as an important part of the natural progression and change of centres, just as such change would occur in a defined centre.

User:	Standard Life Investments

We support Policy SD8(B) that requires boroughs to include within their development plans policies to support the development, intensification and enhancement of each centre, having regard to the current and potential future role of centres. The requirement for development plans to identify suitable sites for higher density mixeduse residential intensification and the comprehensive redevelopment of low-density supermarket sites, surface car parks and edge-of-centre retail / leisure parks is supported. Paragraph 2.1.49 (in relation to the Royal Docks Opportunity Area) recognises that new residential development at Gallions Reach will support its evolution to becoming a designated centre.

User:	Standard Life Investments

Policy SD8(C) requires development proposals to relate to the size and role of the centre and its catchment. The retail provision at Gallions Reach currently provides the attraction and facilities to form a strong basis upon which to build a new major centre. This would not be reliant upon extending the extent of its catchment area to the potential detriment of other established centres.

It is essential that short and medium term asset management initiatives are supported in order to maintain the centres function and retain the strong basis to build the future major town centre.
In order to enable Gallions Reach to evolve to become a major town centre it is important to ensure that the requirements are not too prescriptive in terms of when there will be an increase in floorspace or the exact mix of uses that will be proposed. Standard Life Investments need to be able to respond to changes in tenant and shopping habits. There may be a need to increase the range of uses and amount of floorspace in advance of the allocation as a centre and the potential residential development coming forward.

User: Kingston First

Kingston First supports draft Policies SD6, SD7, SD8 and SD9, which relate to the role of neighbourhood, district, major, metropolitan and international town centres. Kingston is an established Metropolitan Centre which performs well, but to remain relevant and viable it must respond to the various challenges facing UK high streets.

The role and function of the high street is changing and town centres must adapt to the evolving consumer expectations. Traditional planning policies have sought to protect retail use but draft Policy SD6 is clear in that a greater degree of flexibility is required These changes may include better infrastructure to support the logistics involved in 'Click and Collect' shopping and greater support for any leisure facilities whtch would support and promote this behaviour, rather than have goods delivered to the home.

User:	Galliard Homes

Galliard supports Policy SD6 – Town Centres, in particular part C, where the Plan promotes `… new housing within and on the edges of town centres through higher-density mixed-use or residential development…'.

In supporting Policy SD6, Galliard is concerned that Policy SD8 – Town Centres: development principles and Development Plan Document does not encourage or promote residential uses as part of an authority's Local Plan making process. The Plan in one policy supports the need for residential in town centres, but then doesn't promote it in Policy SD8 itself. This doesn't feel properly considered, as residential should at least be listed as an appropriate Town Centre use in the Policy.

User: Halfords Limited

These representations are submitted on behalf of Halfords Limited (“Halfords”), the UK’s leading retailer of automotive and cycling products, and a leading operator in car servicing and repairs. Halfords operate a number of stores across London, principally at established retail warehouse parks and solus stores.

A number of Halfords’ London tenanted stores are currently under immediate threat of closure, resultant from the desire of landlords to redevelop sites for alternative uses, principally for high-density residential use. Some examples of these are provided in Section 4.

The representations are made in respect of emerging Policy SD8 and Policy H1, which seek to promote the redevelopment of out-of-centre retail and low-density retail parks for high-density housing. Halfords see these policies, as currently drafted, as potentially leading to the demise of the retail warehouse sector within the London. This has significant implications in terms of sustainability; the loss of jobs within the sector and the ability of car owners to keep their vehicles in a roadworthy condition. These concerns are set out in Section 5. The representations are made against a backdrop of major demand for a diminishing supply of large format retail floorspace (see Appendix 1).

User: Halfords Limited

National Planning Policy Framework Requirements

2.1 Paragraph 2 of the NPPF states:
'…The National Planning Policy Framework must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning decisions…'

2.2 Paragraph 23 states that LPAs should:
'…set policies for the consideration of town centre uses which cannot be accommodated in or adjacent to town centres.'

2.3 Aligned to this is paragraph 006 of the Planning Practice Guidance:
'It may not be possible to accommodate all forecast needs in a town centre: there may be physical or other constraints which make it inappropriate to do so. In those circumstances, planning authorities should plan positively to identify the most appropriate alternative strategy for meeting the need for these main town centre uses, having regard to the sequential and impact tests.'

2.4 Large format bulky goods retailing is land-hungry so to enable retailers to have sufficient showroom space and storage for the display of bulky items. Due to the size of products there is a need for car parking to enable their transportation, something which customers are generally not able to do by use of public transport or on-foot/cycle. These factors, combined with the lack of availability of large enough in-centre locations, is why large format retailing is generally always located outside of existing town centres. They are particularly relevant to Halfords due to a need for its staff to be able to provide on-site diagnostics and fitting of certain products, 'We Fit' (wiper blades, blubs, car batteries, fuses, cycle carriers, roof boxes and children's car seats etc.).

2.5 Halfords has genuine locational requirements and remain one of the oldest retailers operating within the sector. Their retail warehouse stores are one of those specific forms of town centre uses which cannot be accommodated in, and often adjacent to, town centres (and for which there is a requirement for appropriate policies to be in place to enable them to provide and retain their stores). Halfords has a vital role to play in environmental terms through the retailing of products designed to keep cars in a roadworthy condition[1] and for the sale of cycles and leisure goods to promote active lifestyles, leisure opportunities and a reduction in carbon emissions.

[1] It is for this reasons that Halfords are nationally exempted from Sunday trading hours restrictions.

User: Halfords Limited

5. Why are Policies SD8 and H1 Unsound?

5.1 Paragraph 182 of the NPPF states:

‘**The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is “sound” – namely that it is:**

• Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
• Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
• Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
• Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.’

5.2 Halfords consider that policies SD8 and H1 are unsound in that they are inconsistent with three of the four tests:
1. That they have not been positively prepared;
2. That they are not justified and are not the most appropriate strategy; and
3. That they are inconsistent with national policy.

5.3 The following provides Halfords’ grounds in these regards —

1. The two policies have not been positively prepared

5.4 The two policies target retail warehousing for residential use. The policies are damning of such a retail format due to them being of a low-density, this is borne out in the negative approach adopted in the plan through the language used in Part A, subsection 2 of Policy SD8 where the plan requires development plans to – '**…firmly resisting out of centre development of town centre uses in line with the sequential approach…**'

5.5 This approach is at odds with the National Planning Practice Guidance, which is positively framed, requiring applicants to demonstrate compliance with the sequential test, such that '**if there are no suitable sequentially preferable locations, the sequential test is passed**.' There is no firm resistance at the national level but an acknowledgement that some retail formats cannot be located in-town and therefore, to be acceptable, there is a need to demonstrate compliance with the test, and, if passed, the development should be capable of proceeding (subject to other relevant tests, including the impact test (where relevant)).

5.6 Halfords are a first-wave retail warehouse operator, with a presence on retail parks up and down the country. They have not been approached by the GLA or the authors of the evidence base as part of the plan-making process and the policies, so drafted, have very serious implications for them to be able to ensure that their stores can continue to operate within London. This has very serious implications for the retailer's customers and its employees. The plan has not been positively prepared in this regard.

5.7 The plan clearly sees housing development as being more important to retail warehousing. Halfords understand and acknowledge the need for additional housing within London but do not see why this should be to the complete detriment of a well-established and important format of retailing. The policies are far too biased in favour of the residential developers.

2. The Policies are not Justified and are not the most appropriate strategy

5.8 We have reviewed the Plan's evidence base on the topic of "Economy" to seek to learn of the source of those parts of the two policies against which Halfords object. This includes a review of the London Town Centre Health Check Analysis, GLA (January 2018) and its appendices. Within that documents there is no *relevant* reference to retail warehousing apart from in respect of Brent Cross ("a large out-of-centre retail park"[4]), which it identifies could be reclassified as a Metropolitan Centre.

[4] Paragraph 15.3.5

5.9 There is no reference or recommendation that out-of-centre retail warehouses or retail warehouse parks should be “firmly resisted” or released to “deliver housing intensification through redevelopment”. The choice to do so does not therefore seem to be backed up by facts and, as will be demonstrated shortly, is not backed-up by national planning policy.

5.10 Halfords acknowledge that many of their stores and retail parks (in which their stores are accommodated) are in edge-of-centre and out-of-centre locations because of their trading format. Halfords acknowledge and have always worked with local planning authorities to deliver their stores or store extensions through the established tests of national planning policies (including the sequential and impact tests). It is the carte blanche freedom that the two policies give to residential development proposals and the implications this has for the supply of large format retail floorspace within London which Halfords objects to. The plan appears to have cherry-picked those national planning policies seeking increased residential growth and the high-density use of previously developed land over a requirement to plan positively for those town centre uses that cannot be accommodated in town centres. Reference to the latter is entirely non-existent. The changes to the policies which are provided in the following section seek to readdress the balance so that the policies are consistent with national planning policy.

3. The Policies are inconsistent with national policy

5.11 As highlighted in Section 2, the NPPF and NPPG requires authorities to plan positively to identify the most appropriate alternative strategy for meeting the need for those main town centre uses which cannot be accommodated in town centres, having regard to the sequential and impact tests. The policies are inconsistent with these requirements. We do not consider that there should be a departure from national policy, particularly given the recent trend identified in Section 4 and the implications of this. There is clear evidence that retail warehousing is diminishing at a rate within London. As the Draft Plan illustrates an opposition to the very notion of out-of-centre retail floorspace in the tone of Policy SD8, Halfords have serious concerns that further store closures will be inevitable. As highlighted, we set out some changes to the wording of the draft policies in the following section to address the imbalance.

5.12 Halfords have concerns that as well as the policies being inconsistent with national planning policy concerning town centre uses, there will be an adverse impact on the principles of sustainability. These are explored briefly below:

a) The Economic Role
By not planning for large format retail warehousing the Plan does not “ensure that sufficient land of the right type is available in the right place”. The plan also fails at “coordinating development requirements”, by clearly favouring one form of land use over another. The closure of retail warehouses also results in job losses.

b) The Social Role

Fewer stores mean that people do not have access to this particular type of local service. An example would be that whilst people may have greater housing choice through the policies as currently drafted, there will be limited facilities for occupiers to be able to subsequently furnish them if there are no stores in any reasonable proximity to choose and pick carpets and furniture etc. They will need to travel greater distances by car to access a diminishing pool of retailers, for example in retail parks on the other side of London to where they live. As much of the housing is car-free it may actually be impossible to purchase such products as customers will simply have no means of transporting bulkier goods home. This places a reliance on mail order products (which are more likely to be returned as customers are unable to see or test them before ordering) and a reliance on deliveries by HGVs. This does not support the government's wish to move to a low carbon economy.

Halfords have given consideration to opportunities for click and collect facilities as a response to diminishing store numbers within London, however this form of "shopping" is less relevant to Halfords' product range as their customers are more reliant upon, and guided by, in-store expertise on their products, particularly if the customer has no particular knowledge of appropriate components and/or seeks to discuss options related to safety-related products (such as infant car seats). Halfords' staff are given significant expert training in these areas.

As highlighted in Section 2, Halfords' business model relates to customers being able to keep their cars in a roadworthy condition; purchase and have fitted car parts (including bulbs, wiper blades, batteries, infant car seats etc); purchase leisure goods (camping equipment, roof boxes etc); purchase cycles and the offering of facilities for the upkeep of cycles (to promote sustainable forms of transportation). These all provide a valuable social role. These product types inform their store sizes, configurations and requirements for car parking - the combination of which means that their stores have traditionally been located outside of town centre environments and which must be planned positively for. Halfords, and other retail warehouse operators with genuine locational and format needs, are not the enemy of the high street but provide a form of retailing that is complimentary to that capable of provision within town centres.

At paragraph 2.8.1 of the Draft Plan it is stated that "Out-of-centre development can be particularly detrimental to town centres…" This may be true of those traditional high street retailers (such as fashion retailers) who have sought to occupy large format retail floorspace without regard to the rationale of such floorspace being provided in the first place (see paragraph 2.4, above), as they are more likely to be in direct competition with the high street. Halfords do provide some small in-town stores (the Halfords Metro format), but these operate alongside their retail warehouses and provide a different product mix; and not withstanding this Halfords have closed a number of these store this year (leaving only a handful remaining) because the format is not satisfactorily in-line with their strategic business model as they are only capable of providing a limited range and are unable to offer any 'We Fit' provision.

c) The Environmental Role

As set out in the example above, fewer stores means that Halfords' customers must travel further to access their products. As bulky goods retailing is reliant on car-borne journeys the erosion of facilities will require longer distance trips. This will have an adverse impact on the government's aim to move towards a low carbon economy.

User: Halfords Limited

6. Recommended changes to Policy SD8 and H1

6.1 As stated, Halfords support the need for increased residential units and the efficient use of land. Halfords have also been in a position (Cantium Retail Park, Old Kent Road) where the landlord has sought to re-accommodate them into their redevelopment plans, however the format offered (a considerably smaller quantum of floorspace, little or no parking, no provision for on-site vehicle diagnostics and fitting) meant that their retail format is incapable of being provided. In the example of Cantium Retail Park, Halfords' Property Team considered what was offered with a significant degree of flexibility, however their retail model simply could not be considered compatible.

6.2 The following sets out the changes Halfords would wish to see to the two policies to address the clear bias in favour of the residential developers and so that the boroughs "plan positively" for the retail format. The suggested deletions are crossed-through and the additions are provided in bold text.

Policy SD8

A. Development Plans and development proposals should take a town centres first approach by:

1. adopting a sequential approach to accommodating town centre uses including retail, commercial, offices, leisure, entertainment, culture, tourism and hotels such that new development of these uses is focused on sites within town centres or (if no sites are available, suitable or viable) on sites on the edges of centres that are, or can be, well integrated with the existing centre, local walking and cycle networks, and public transport

~~2. firmly resisting out-of-centre development of town centre uses in line with the sequential approach in A(1) above, with limited exceptions for existing viable office locations in outer London (see Policy E1 Offices)~~

3. providing an impact assessment on proposals for new, or extensions to existing, edge or out-of-centre development for town centre uses in part A(1) above that are not in accordance with the Development Plan. Local planning authorities should require should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if no locally set threshold, the default threshold is 2,500 sq.m)

4. realising the full potential of existing out of centre retail and leisure parks to deliver housing intensification through redevelopment (subject to the following tests) and ensure such locations become more sustainable in transport terms, by securing improvements to public transport, cycling and walking. This should not result in a net increase in retail or leisure floorspace in an out-of-centre location having regard to parts A(1), (2) and (3) above. **Where applicants propose the redevelopment of out of centre retail and leisure parks, or where boroughs propose to define such sites for alternative uses, they must:**

a) Provide evidence of consultation with existing retail and leisure occupiers demonstrating that they have taken into account:

i. The desire of existing occupiers to continue to trade/operate from the site; and

ii. That if there is a desire for any existing occupier to continue to trade/operate from the site that they can demonstrate that they have made every effort to re-accommodate them having consideration to the replacement floorspace being fit for purpose and in-line with their existing retail/leisure model. Operators must provide evidence of their retail/leisure model and demonstrate flexibility in format and scale. There will be an expectation that existing operators, who have a desire to continue to trade/operate, can be re-accommodated within redevelopment schemes.

b) Planning applications will be refused where the above criteria are not met and proposals, by boroughs, to define such sites for alternative use will be expected to safeguard existing occupiers. In these circumstances less weight will be afforded to those operators who cannot demonstrate that they have genuine locational, operational and floorspace requirements for the particular location/format.

In cases where there is no agreement reached between the parties then it will be expected that they appoint a suitably qualified person to undertake an independent review of the evidence submitted and which will be a material consideration in the plan-making and/or decision-making process.

B. In Development Plans, boroughs should:

1. define the detailed boundary of town centres in policy maps including the overall extent of the town centre (taking into consideration associated high streets which have particular economic or social value) along with specific policy-related designations such as primary shopping areas, primary and secondary frontages and night-time economy in light of demand/capacity assessments for town centre uses and housing

2. develop policies through strategic and local partnership approaches (Policy SD9 Town centres: Local partnerships and implementation) to meet the objectives for town centres set out in Policy SD6 Town centres to support the development, intensification and enhancement of each centre, having regard to the current and potential future role of the centre in the network (Policy SD7 Town centre network)

3. develop policies for the edge and fringes of town centres, revising the extent of shopping frontages where surplus to forecast demand and introducing greater flexibility, permitting a range of non-residential uses particularly in secondary frontages taking into account local circumstances

4. set policies for the consideration of town centre uses which cannot be accommodated in or adjacent to town centres.

5. identify centres that have particular scope to accommodate new commercial development and higher density housing, having regard to the growth potential indicators for individual centres in Annex 1. Criteria to consider in assessing the potential for intensification in town centres include:

a. assessments of demand for retail, office and other commercial uses

b. assessments of capacity for additional housing

c. public transport accessibility and capacity

d. planned or potential transport improvements – to indicate future capacity for intensification

e. existing and potential level of density of development and activity

f. relationship with wider regeneration initiatives

g. vacant land and floorspace – as a further measure of demand and also of under-utilisation of the existing centre

h. potential to complement local character, existing heritage assets and improve the quality of the town centre environment

i. viability of development.

6. identify sites suitable for higher density mixed-use residential intensification capitalising on the availability of services within walking and cycling distance and current and future public transport provision including, for example:

~~a. comprehensive redevelopment of low-density supermarket sites, surface car parks, and edge of centre retail/leisure parks~~

b. redevelopment of town centre shopping frontages that are surplus to demand

c. redevelopment of other low-density town centre buildings that are not of heritage value, particularly where there is under-used space on upper floors, whilst re-providing non-residential uses in accordance with the tests in part A(4) above.

d. delivering residential above existing commercial, social infrastructure and transport infrastructure uses or re-providing these uses as part of a mixed-use development.

e. support flexibility for temporary or ‘meanwhile’ uses of vacant properties.

C. Development proposals should:

1. ensure that commercial floorspace relates to the size and the role and function of a town centre and its catchment

2. ensure that commercial space is appropriately located having regard to Part A above, fit for purpose, with at least basic fit-out and not compromised in terms of layout, street frontage, floor to ceiling heights and servicing, and marketed at rental levels that are related to demand in the area or similar to surrounding existing properties

3. support efficient delivery and servicing in town centres including the provision of collection points for business deliveries in a way that minimises negative impacts on the environment, public realm, the safety of all road users, and the amenity of neighbouring residents

4. support the diversity of town centres by providing a range of commercial unit sizes, particularly on larger-scale developments.

User: Halfords Limited

7. Conclusion

7.1 Halfords are supportive of the need to increase housing supply within London, but not so to the complete detriment of large format retail warehouse operators. The emerging Plan does not accommodate such specialist forms of retailing and the two policies do not appear to be backed by evidence.

7.2 There has been a recent serious erosion in the provision of large format retailing within London. The emerging policies, if not amended to acknowledge and support such specialist forms of retailing, will have serious implications for the future of this form of retailing. The approach conflicts with national planning policy which requires plan-makers to plan positively for such town centre uses. They are also in conflict with the three dimensions to sustainable development, including that relating to the ability to access certain forms of land use. The two policies are very much biased towards one land use over another specific form of land use – something that Halfords strongly considers should be rectified.

7.3 Halfords are very much alive to the fact that they must be flexible and adapt their retail model to changes within the property market. This is something that they are actively pursuing as a retailer, however the tone of the two policies is stacked against them.

7.4 The changes proposed to policies SD8 and H1 will continue to promote the redevelopment of sites, including that incorporating high-density residential development, but not in a manner which effectively promotes the demise of the retail warehouse sector within London. Large format retailing, which is an established retail model with distinct locational and operational requirements, cannot simply be sacrificed for high-density housing in the manner proposed. There is no justification for this and the intention is at odds with national policy and the clear desire for Halfords, and other large format retailers, to continue to serve their customers within London.

User:	F&C UK Property Fund ICVC

Our client is also supportive of draft Policy SD8 (Town Centres: development principles and Development Plan Documents) and its initiatives to identify sites suitable for higher density residential intensification, particularly capitalising on those sites with services within walking and cycle distance of current and future public transport provision. 117 North Street (our client's site) is in a very sustainable location, with a PTAL rating of 5. F&C welcomes the draft policy's identification in part 5 a) oflow-density supermarket sites, surface car parks and edge of centre retail/leisure parks as sites that could be comprehensively redeveloped to provide housing ..

User: Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living

SD8 (86) - Town Centre Development Principles

This policy should reflect the advantages of including specialist housing for elderly in and on the edge of town centres. This use is proven to strengthen the local economy due to the tendency of older people to shop locally and use local services.
Redundant commercial space which is suitable for the provision of older people's housing might reasonably be allocated for this use, particularly where it is found that existing town centre boundaries should be reduced in light of capacity and demand as recognised in the DLP.

Objection: This policy is not positively prepared and should be amended to reflect and promote the unique advantages that additional older people's housing can provide for town centres.

User: Tesco Stores Ltd

2. Housing Delivery

This section of these representations make the following points:

1. Tesco support the ambition to deliver significantly more homes in London than have been delivered in the recent past;

2. However, there is a potentially significant shortfall in housing supply identified by the Draft London Plan;

3. As major landholder, Tesco has a number of assets that could contribute in the region of 10,000 new homes, which represents a significant source of housing supply, provided the Draft London Plan encourages rather than constrains redevelopment.

2.1. In his recently published Draft Housing Strategy the Mayor made it clear that *"London's housing crisis is the single biggest barrier to prosperity, growth, and fairness facing Londoner's today."1 Tesco concur and welcome the recognition given in the Draft London Plan that solving the housing crisis will require a significant increase in the rate of housing delivery.*

2.2. The Draft London Plan refers to an overall need for 66,000 homes per year for at least 20 years. This figure is informed by the 2017 SHMA carried by the GLA 2. The methods used to estimate London's housing requirements in the 2017 SHMA closely follow those used in the 2013 SHMA. The 2013 SHMA was carried out before government had provided its guidance through the NPPG in 2014 and before the recent consultation on a standardised methodology for assessing need3. At the time of writing the Governments conclusions on its proposed standard methodology are not yet known. However, Tesco support a consistent approach to assessing housing need to ensure that housing is properly planned for locally, regionally and nationally.

2.3. The Draft London Plan sets a London-wide housing target of circa 66,000 new homes a year, which is a significant increase over the current target of 42,000. Historically, delivery has consistently fallen behind the targets. Completions reached a high point in 2015/16 when circa 39,000 homes were completed4. Whilst in the previous year completions were closer to 32,0005. This position is hugely ambitious and in order to achieve such a significant increase in the rate of housing delivery it is essential that the Draft London Plan encourages rather than constrains development, and Tesco can contribute much toward addressing this issue.

2.4. With a potentially significant shortfall in housing supply, the Draft London Plan must identify every source of housing and ensure that these can be delivered. As a major landholder in London, Tesco is able to contribute to Good Growth through optimising its assets with mixeduse redevelopment including the provision of housing. It has identified through earlier SHLAA submissions a number of freehold and leasehold opportunities, which can be realised for housing. These assets could deliver in the region of 10,000 new homes. If realised, this could be a significant source of housing supply. However, Tesco have identified two major areas of concern, where the provisions of the Draft London Plan, as drafted will constrain the development of its assets and prevent the delivery of these homes: viability and car parking.

2.5. In order to further encourage the development of Tesco's assets we recommend the following changes to policy SD8 para A 4) and policy H1 B 2) b) so that supermarkets are specifically identified as a residential development opportunity.

SD8 para A 4

4) realising the full potential of existing out of centre retail and leisure parks, ***and supermarkets*** *to deliver housing intensification through redevelopment and ensure such locations become more sustainable in transport terms, by securing improvements to public transport, cycling and walking. This should not result in a net increase in retail or leisure floorspace in an out-ofcentre location having regard to parts A(1), (2) and (3) above*

H1 para B 2) b)

b) mixed-use redevelopment of car parks, ***supermarkets*** *and low-density retail parks*

User: Tesco Stores Ltd

5. Retail

5.1 Tesco is committed to helping the good growth agenda by delivering new homes across its portfolio of existing foodstore sites in London, where this can be achieved viably in conjunction with providing a replacement store. As part of this process it will be necessary to reappraise the retail format of the replacement store to ensure that it meets current and future needs. In many cases the replacement store may be smaller than existing, although in others cases it may be a similar size and format.

5.2 Tesco fully supports the town centre first approach set out in the NPPF and in policy SD8 of the Draft London Plan. However, it is considered that policy SD8 should be amended to make it clear that the need for a sequential approach and assessment of impact should not be required in respect of replacement retail floorspace, only new or extended space. We therefore recommend the following further changes to policy SD8, in addition to those suggested above:

Policy SD8 Town centres: development principles and Development Plan Documents

A Development Plans and development proposals should take a town centres first approach by:

1) adopting a sequential approach to accommodating ***new*** *town centre uses* ***and increases in floorspace*** *including retail, commercial, offices, leisure, entertainment, culture, tourism and hotels such that new development of these uses is focused on sites within town centres or (if no sites are available, suitable or viable) on sites on the edges of centres that are, or can be, well integrated with the existing centre, local walking and cycle networks, and public transport*

2) firmly resisting out-of-centre development of town centre uses in line with the sequential approach in A(1) above, with limited exceptions for existing viable office locations in outer London (see Policy E1 Offices)

3) providing an impact assessment on proposals for new, or extensions to existing, edge or outof-centre development for town centre uses in part A(1) above that are not in accordance with the Development Plan

5.3 We also suggest a small change to paragraph 2.8.2 to make it clear that the text is not intended to relate to replacement retail floorspace:

*2.8.2 Where **new edge-of-centre developments of town centre** uses are proposed, and are not in accordance with the Development Plan **or are not proposals to replace existing floorspace,** these should be accompanied by a robust and detailed impact assessment. This applies to retail, leisure and office development greater than 2,500 sq m.*

User: HHGL Ltd

Representations to Draft London Plan

The current network of Homebase/Bunnings stores in the UK & Ireland extends to 255 stores. Of these, approximately 30 are located within the London area.
Four of the existing stores in the London area have or are currently in the process of being converted to a Bunning Warehouse. These are the stores at Hanworth, Penge, Walthamstow and Walton on Thames. This investment involves the complete refurbishment of the individual stores and is likely to secure new employment as stores converted to the Bunnings brand see, on average, a 50% increase in staff numbers.

Policies SD8 and E9 of the Draft London Plan relate to retail development. Part 5) a) to Policy SD8 and part 8) to Policy E9 suggest that Borough's, through their Development Plans, should seek to encourage higher density development or the more intensive use of edge and out-of-centre retail sites and retail parks for a diverse mix of uses including specifically new housing. This is expanded further in paragraph 2.8.3, with the proviso that redevelopment should not generally result in an increase in retail floorspace given the town centre first approach.

Our clients recognise the general need for new housing within London and support those policies that seek to increase housing provision on appropriate sites. However, they are very concerned that the policies as drafted appear not to recognise the important role of existing retail businesses on edge and out-of-centre sites and neither do they provide any clarity or commitment to those businesses. For example, it is unclear as to whether this policy approach is seeking to promote the retention of existing retail uses within any future redevelopment schemes and if it is not, what the implications of that approach will be for these businesses. These are businesses, such as Homebase/Bunnings, that perform important roles not only just in terms of providing Londoners with access to bulky comparison goods that cannot be sold or accommodated within existing town centres, but also as a source of a significant number of local jobs.

A policy approach that fails to cater for edge and out-of-centre retail businesses or which failed to address the need for large format retail warehousing, would be inconsistent with the retail policies of the National Planning Policy Framework (March 2012). It would also appear to contradict part A of Policy 9, which suggests that the draft Plan recognises and supports the benefits of a diverse retail sector.

In addition, the statement in paragraph 2.8.2 that edge and out-of-centre retail uses are often car dependent, not sustainable and poorly integrated, is a sweeping generalisation that does not appear to be supported by any specific analysis or evidence.

Bunnings growth (and future investment) is focused on driving energy efficiency, waste reduction and ethical sourcing. Its sustainability policies seek to ensure that the business, moving forward, is socially responsible and environmentally aware. It actively supports local communities and included amongst its recent projects in London was support (from 6 stores) for Bromley in Bloom involving the donation of wheelbarrows to 24 local schools to design and plant. Bunnings is, therefore, highly committed to reducing its carbon footprint and to fully integrating and supporting the local communities that its stores inhabit.

Given the above, our clients would request that draft Policies SD8 and E9, together with their supporting text, be amended to:

? Recognise the important contribution that edge and out-of-centre retail stores make to the comparison offer of individual Borough's, in complementing existing town centres, offering the opportunity for linked trips, providing access to bulky goods that cannot be accommodated within existing town centres and in promoting access for all modes of transport
? Recognise the importance of these retail businesses as a source of a large number of local jobs and the need to protect those jobs and the role that retail warehouses perform given the lack of alternative sites for this form of large format retail use within London
? Confirm that within any redevelopment scheme the existing retail use will be retained as is or reincorporated within the new development and if this is not possible, for planning, operational, design or viability reasons, to include a firm commitment to relocating those businesses to alternative sites

User: Mr Drew Stevenson

In his vision in the Foreword, the Mayor sees “A city where people can spend less time commuting because we have so many thriving parts of London, with good affordable housing combined with exciting, cutting-edge career opportunities.” That is a very appealing prospect and **should be heavily supported**. However, it will not happen easily. The London Plan since its early days in 2004 has attempted to encourage Town Centre growth but, with one or two notable exceptions (Stratford for example) really significant growth has been hard to achieve outside Inner London.

The housing policies in the draft LP make clear that a lot of growth needs to be in and around the Town Centres, including the contentious statement that “local character evolves over time and will need to change in appropriate locations to accommodate additional housing provision.” (Policy H2B 1). In general, I agree with that. My main concern is that, if growth (not just housing) cannot be attracted to the suburbs, not only will the housing targets be missed, but the quality of life, with increased commuting on over-crowded trains and even heavier pollution, will deteriorate further.

I think that the difficulties of turning this around should not be underestimated and therefore:

*****I suggest that** the preparation of Town Centre strategies and the release of housing sites in Outer London be given a priority by the Mayor alongside the Opportunity Areas nearer the centre.

It is equally important that employment uses are encouraged to spread further. It is worrying for example that in the Elizabeth Line East corridor, there are only 500 jobs planned in Ilford and in Romford, but 65,000 in Stratford alone (with 110,000 in the neighbouring Isle of Dogs). Greater investment and commitment to preparing integrated strategies, with the involvement of the Mayor, are needed in the suburbs.

I don’t think its an exaggeration to say that the success of the Plan in creating the kind of polycentric city that lies behind the thinking in the Mayor’s Foreword, will hinge on the success of those strategies.

User: City of London Corporation

SD8: Town centres: development principles and Development Plan Documents

The policy outlines a sequential approach to retail development across London, which accords with national guidance as set out in the NPPF. It sets detailed guidance on what is expected in borough Local Plans in relation to retail, including definition of town centres on policy maps. The City Corporation has no objection to the overall approach to retail development, but it does seem to relate principally to larger, more traditional town centres, and is less applicable to the CAZ retail clusters in the City of London which are narrower in extent and focussed on retail frontages. London Plan policy should be sufficiently flexible to respond to changes in the extent and designation of centres through Local Plans.

Policy SD9 Town centres: Local partnerships and implementation

User:	London Borough of Richmond Upon Thames

The proposal for active planning with town centre stakeholders is supported – but this does have resource implications which the Plan does not adequately address. And whilst BIDs, town centre partnerships etc are important, the local authority should be the principal agency for doing this.

User:	Royal Borough of Greenwich

We are pleased to note that the draft Plan aligns with our aspiration for Woolwich to be reclassified as a Metropolitan Town Centre in the future. We also support the requirement to realise the full potential of existing out of centre retail parks to deliver housing, and this is an approach that we’re already pursuing in Charlton Riverside. Overall, the approach to town centres in policies SD6 to SD9 is comprehensive and effective and we welcome this more holistic approach.

User: McDonald's Restaurants Ltd

13. Policy SD9: Town centres: Local partnerships and implementation

13.1 We welcome the Draft Plan's support for local partnership approaches, community engagement, town centre management, business associations and Business Improvement Districts.

82% of our restaurants in London are owned and operated by 24 franchisees with the remainder operated by McDonald's corporate group (McOpCo). A number of our franchisees, many of whom operate small and medium-size enterprises, actively participate in local BIDs across the city, from Wood Green in the North to Brixton in the South, via Leicester Square and the Heart of London BID.

Three examples of the active role our franchisees play in their communities are set out below.

Bill Perera began his McDonalds career in the restaurant in Catford in 1980 and today is the owner and operator of five McDonald's restaurants across Bexley, Bromley, Sevenoaks and Sidcup. He has always been committed to contributing to the local communities around his restaurants.

Often working closely with local councillors and MPs, Bill's restaurants organise regular litter events, supporting the Keep Britain Tidy 'Love Where You Live' campaign through community events. In addition, the restaurants also sponsor local football teams: Orpington FC and St Mary Cray Athletic FC. Bill's businesses have won many environmental awards and best employer awards including 'Best Green Business' at the 2016 Bromley Business Awards.

Bill was born in Sri Lanka and often revisits the country as well as supporting a local orphanage there. Previously, he has held the position of Head of International Operations for McDonald's, opening restaurants in Sri Lanka, Pakistan and India.

Bill supports Orpington Business Improvement District (BID) and became a Board Director in 2013. He sponsors the Orpington town Christmas tree.

Atul Pathak was born in India and came to the UK soon after graduating. He became a franchisee in 2003 and is now the largest McDonald's franchisee in the UK and owns 27 restaurants in London across 10 boroughs in West and North London.

Atul employs over 2,500 staff and places a strong emphasis on development and training having opened a state-of-the-art training centre, which is also an accredited examination centre. This enables his employees to gain workplace skills and nationally recognised qualifications that are equivalent to GCSEs and A-levels, including a Level 2 Apprenticeship in Multi-Skilled Hospitality.

Atul's community work extends to supporting a number of youth football teams to nurture local football talent. In addition, he and his staff carry out a number of clean-up campaigns to help enhance the local environment.

He has always sought to give back to the community, working with a number of local community organisations and charities. In the last 10 years, Atul's company along with Atul himself, have raised around £500,000 for various charities. He also voluntarily donates a percentage of his annual sales to charities and in 2013 he trekked across the Sahara Desert for four days, raising over £20,000 in the process.

Atul has also been chairman of the Community Focus Group in Southall from 2006 to 2013. The group, made up of local business owners, community leaders police officers, local councillors and residents, is a forum where community issues and problems are discussed and the solutions prioritised. During his tenure as chairperson, good progress was made across many areas which included reducing drug crime, prostitution and knife crime in Southall.

Claude Abi-Gerges operates 21 restaurants across Westminster, Camden and the City of London. He is a Board Director at the Heart of London BID, and an active member in a number of other BIDs an active member of a number of BIDs across the area, such as the New West End Company, the Fitzrovia Partnership and Camden Town Unlimited. Claude supports local employment initiatives such as Recruit London, and was a founding member of the Young Westminster Foundation.

He works closely with local police, and supports a number of initiatives including Police on Pride Day, taking part in regular crime intelligence meetings and was one of the early adopters of the Best Bar None initiative for late night operators within Westminster. He is also a member of the Night Time Economy Strategy Group in Westminster and has also recently been working with St. Mungo's to combat homelessness in Central London.

User: London Borough of Havering

Criteria A

The draft London Plan says each town centre should have a strategy produced in partnership at the local level in a way that is inclusive and representative of the local community.

The draft London Plan should recognise that this may not be a realistic prospect in the case of very small centres. In some of these, capacity is lacking within the business community to engage in a series strategy development process and it would require considerable resources from boroughs which are not currently available.

The draft London Plan should recognise that boroughs will have concerns about how they resource partnerships.

Targeted Article 4 Directions are supported but may already be too late.

User:	London Borough of Newham

LBN generally support this policy and it is considered to be complementary to Newham’s Draft Revised Local Plan.

However, it is considered that there is a particular focus on specialist forms of housing such as build to rent, student housing and housing for older people. Town centres tend to offer a broad range of housing typologies which serve the needs of all people including families. Policy SD9 should not place emphasis on specialist forms of housing and should follow the inclusive tone set elsewhere in the London Plan and strive to support mixed and balanced communities.

User:	The Wimbledon Society
Support SD1 & SD9, encouraging the production of plans in a collaborative way with local communities	

User:	John Innes Society
we broadly support these policies.	

User: London First

Policy SD6: Town Centres, SD7: Town Centre Network and SD9 Town Centres: local partnerships and implementation
We welcome the Plan's recognition of the important role of town centres as primary locations for commercial activity beyond the CAZ and as contributors to the local and London-wide economy. We also welcome recognition of the role that town centres can play in increasing housing delivery. The accessibility of town centres to amenities, such as retail, leisure, social, cultural and transport infrastructure, means that they are appropriate locations for higher-density development as recognised by part C of the policy. However, the policy should go further to identify that town centres are suitable locations for tall buildings.

We welcome the requirement in policy SD9 for each town centre to have its own strategy. However, we believe the Plan's policies and supporting text should go further to encourage boroughs to move away from local retail frontage policies that set minimum thresholds for A1 retail frontages (and therefore restrict non A1 retail or other town centre uses) within a shopping street. The Plan should contain policy guidance that encourages a wider scope of uses within town centres – such as leisure, food and drink, commercial, cultural and civic – that would maintain a vibrant high street. Whilst this is implied within the policy, it is not specifically stated.

User: Just Space

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

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

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

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

Additional Policy element in SD9

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

User:	London Borough of Bexley

Policy SD9 Town centres: Local partnerships and implementation is considered to have significant financial and resource implications for London boroughs. To produce a tailored town centre strategy for each town centre would be onerous, costly and time consuming. Many of the issues, particularly spatial issues, can be covered in local plans, supplementary planning documents and planning frameworks.

User: Heart of London Business Alliance

We welcome Policy SD9: Town Centres: Local partnerships and implementation, though it should make clear that this applies to centres not identified within Policy SD7: Town centre network within the CAZ such as the International Retail Centres of the West End and Knightsbridge, the broader WERLSPA, CAZ retail clusters and other specialist centres. In particular the recognition of the role of Business Improvement Districts (BIDs) in developing “strong, resilient and adaptable town centres (Policy SD9 A)” applies equally to these areas and there is by far the densest concentration of BIDs within the CAZ.

We would also support the Article 4 Directions to be extended to cover other permitted development rights in Policy SD9 C 1), when supported by evidence. For example the City of Westminster has implemented an Article 4 Direction in respect of A1 to A2 uses due to a loss of retail floorspace to estate agents.

User:	Federation of Small Businesses

The facts are striking. More than 1.47 million sqm of office floorspace could potentially be lost in PDR prior approvals (about 6 per cent of London’s total office stock). The impact is strongest in outer London where almost 20 per cent of the stock could be lost.

Boroughs need greater support from the GLA in applying for Article 4 Directions as they often do not have the capacity to apply for them.

User:	Ministry of Housing, Communities & Local Government

We would welcome further assurance on the deliverability of the proposed requirement that each town centre has a Town Centre Strategy. We would be interested to hear the views of LPAs on this policy, particularly on whether similar aims could be achieved through promoting good practice, and left to the discretion of LPAs to determine if and where Town Centre Strategies are needed.

User: Revo

We support the Plan’s efforts to bring further collaboration between the public and private sectors to leverage expertise and engage relevant stakeholders, particularly where there is a skills deficit due to the limited resources available to Local Authorities and to ensure community input.

We also support the call for Boroughs to consider the mechanisms by which they deliver mixed-use development and ongoing asset management, including investment models where our sector has significant expertise.

User:	British Property Federation

Local authorities are operating in a time of reduced resources, meaning development plan policies will need to be strongly supported by the private sector if they are to achieve implementation. Therefore, we are pleased that the draft plan encourages more engagement between local authorities and the private sector and would advise that both need to become more receptive to the demands of each other and ensure that improving the town centre is their absolute priority.

User: Elaine Chambers

Policies SD6, Town Centres, SD7 Town Centre Network, SD8 Town Centres, development principles and DPDs , SD9 Town Centre Partnerships and implementation

We have concerns about such a large amount of policy being focus on Town Centres, especially when increasing amounts of shopping is being done online.

Our concerns are the predominance of global stores and cafes; the viability of so many town centres being in close proximity to others, loss of local character and loss of shops, services, local markets and amenities that meet local needs and which are more likely provide employment to local people.

User:	Historic England

We support the following helpful references:

Part A Each town centre should have a town centre strategy produced in partnership

Part C A partnership approach to bring sites forward for redevelopment

Para 2.9.2 Town centre strategies should be tailored to each town centre, developed with stakeholders, including Historic England

User:	Living Streets

We strongly support the requirement for town centre strategies that include Healthy Streets, transport strategy, highways management and air quality.

User:	Camden Town Conservation Area Advisory Committee

SD9 A

We welcome this policy and the introduction of a mandatory Town Centre Strategy produced in partnership at the local level in a way that is inclusive and representative of the local community including businesses and industry.

User:	Camden Town Conservation Area Advisory Committee

SD9 C 1)

We welcome this policy on the introduction of appropriate Article 4 Directions to prevent the loss of affordable, functioning work-space in Camden Town, which is well recognised as a contributor to Camden Town's character, tourism reputation and economic success. Examples are sculptor Antony Caro's workshop, creative premises for the Muppets, music recording and 'creative media' studios, artists' studios (inc Frank Auerbach), dressmaking businesses (inc Vivienne Westwood) and Camden Market's many outlets for craft and creative goods and foods.

User:	Camden Town Conservation Area Advisory Committee

SD9 C 1)

We welcome this policy on the introduction of appropriate Article 4 Directions to prevent the loss of affordable, functioning work-space in Camden Town, which is well recognised as a contributor to Camden Town's character, tourism reputation and economic success. Examples are sculptor Antony Caro's workshop, creative premises for the Muppets, music recording and 'creative media' studios, artists' studios (inc Frank Auerbach), dressmaking businesses (inc Vivienne Westwood) and Camden Market's many outlets for craft and creative goods and foods.

User:	London Borough of Sutton

OBSERVATION. The London Borough of Sutton supports Policy SD9 - Town Centres: Local Partnerships and Implementation but considers it an unnecessary policy. Much of what is stated in the policy is basic, sound planning or repeated from national policy or guidance. The Council considers that these are not strategic matters which are best devolved to the local level which has a better understanding of the context to deal with detailed local matters. (similar comments apply to Policy SD8).

User:	North London Waste Authority

Within the concept of strong, resilient and adaptable town centres, the NLP should also recognise the contribution that reuse shops, charity shops, repair cafes and resource libraries ('libraries of things') can make to town centres. NLWA encourages the Mayor of London to consider incorporating 'reuse' as well as the sale of new items into town centre development objectives and plans in order to exemplify reuse as well as the sale of new items.

User:	North London Waste Authority

Within this section, NLWA urges the Mayor of London to allow for on-the-go recycling, although we note that environmental charity, Hubbub's experience from their #SquareMileChallenge to recycle more coffee cups in the City was that permanent recycling facilities on the high street tend to collect contaminated waste and attract litter. However, facilities placed in workplaces, educational establishments, transport hubs and public buildings were better used and reduced the cost burden on local authorities. This being the case town centre strategies should include waste, recycling and reuse as noted above, but recognise that a number of different players may be able to establish the necessary provision of facilities

User: Footwork Architects Limited

Principle 1
Social needs must be identified and addressed as a prerequisite to development

Description:

Whether creating a new neighbourhood, or regenerating an existing one, to transform the built environment alone will not provide for social needs. There must be a thorough understanding of social context and existing problems, then specific steps identified to address them. Until these social factors are tackled, built environment professionals cannot create the physical conditions to help a community thrive. It is essential to avoid repeating the mistakes of the past and to learn from what has worked, through developing and implementing mechanisms for the measurement of success.

Assessment:
Methodology is already in place to assess local social needs:

- *Index for Multiple Deprivation* (the generally accepted measure)
- *Joint Strategic Needs Assessment* and *Joint Health and Wellbeing Strategies* (see Marmot
- Report and the Social Care Act 2012 – aimed at reducing health and social inequalities)
- *Healthwatch* (for local anecdotal data)

Application:

- Each borough to provide a **Social Needs Assessment** within their *Development Plan* and *Local Plan*, referred to within the *Core Strategy* and detailed as a Supplementary Planning Document, which must be kept updated
- This requirement could be inserted at Policy D2 of the Draft New London Plan, by dividing item ‘A’ into two parts. New ‘A’ to be an evaluation of socio-economic and well-being factors, heritage/ character and social infrastructure (currently points 1, 7 and 11); and new ‘B’ an evaluation of the data relating to physical and environmental factors (all the remaining points)

- Local authorities, Clinical Commissioning Groups and other service providers to take steps to address existing social needs, identified in the Social Needs Assessment and against agreed benchmarks, as a pre-requisite for designating *Opportunity Areas*, *Local Areas for Regeneration* and *Strategic Areas of Regeneration*
- *Supplementary Planning Guidance* (SPG) to be prepared (perhaps combined with the SPG on Social Infrastructure currently being reviewed - see below). This must be referenced in all strategic and major development proposals, with the inclusion of a Social Needs Assessment and a strategy for how identified local social needs and well-being are to be taken into account
- *Design Review Panels* to consider strategies to address social needs and well-being as an agreed component of the quality of a design. This must also to form part of the Mayor's planned Guidance on Design Reviews
- *Post-occupancy Surveys* (RIBA Plan of Work Stage 7) to become a contractual obligation for all major housing developments, at 1 year and 5 years after full occupancy. This will be an invaluable reference point for Development Plans and should be obligatory

[Policy GG2: 1.3.1, 1.3.2
Policy GG3: A, D
SD9: 2.10.2, 2.10.1, 2.10.3, 2.10.4; 2.10.5
Policy D2: A
Policy H13: 4.14.1
Policy S2: A: 1; 5.2.7, 5.2.8]

User:	Highgate Society

SD9 (C) Support and comment:

This is welcomed. The application of PD Rights from B1 to C3 has resulted in a large number of substandard and non compliant dwellings, whilst having a negative impact on employment and the viability of shopping centres. However, boroughs need the resources to set up Article 4 Directives. In the Society's experience, lack of resources is cited as a reason for not proceeding with Article 4 Directives.

User:	Chairs of Camden's Conservation Area Advisory Committees

SD9 C 1) We welcome this policy on the introduction of appropriate Article 4 Directions to limit the loss of functioning work-space in specific areas.

User:	Sustrans

SD9 A

Sustrans strongly supports the requirement for town centre strategies, including Healthy Streets, transport strategy, highways management and air quality.

User: Sean Creighton

Policy SD7 Town centre network

37. Section E of this Policy discusses the need for the focus in district centres ‘on the consolidation of a viable range of functions, particularly convenience retailing, leisure, local employment and workspace’, etc.

38. Norbury is a District Centre along London Rd. In its evidence to the Croydon Local Plan (Partial Review) the LNPC accepted that there is scope for this approach. However, I have already pointed out in paras 7 & 8 how the Council has undermined the ability to achieve this.

39. Because it is the residents who understand the way in which District Centres are being changed by commercial landlords, developers, buy-to-let- landlords, the local community in District Centres must be involved in planning changes through a District or Neighbourhood Forum with the Council, TfL, transport operators, and local businesses.

40. A step in this direction is due to take place between the Norbury Councillors and LN and other local organisation on a voluntary basis, supported by a Council policy for devolution. However that policy could be reversed in the future as it is not based on a legislative foundation.

41. The Love Norbury Transport Committee is in discussion with the area Station Manager about the run down nature of Norbury Station and its linked estate. Regeneration of the Station is a key to carefully managed development and intensification of the District Centre. It is clear that unless Network Rail is provide with funding nothing will happen

42. The concept of detailed development plans as outlined for town centres in Policy SD8 (Town centres: development principles and

Development Plan Documents) should be required for District Centres. In relation to Croydon and Norbury these would go into more detail than the overview approach in the newly adopted Croydon Local Plan. The characteristics described in it for example of Norbury were changed in the light of some the comments of LNPC to strengthen the description.

43. Similarly the concepts in Policy SD9 (Town centres: Local partnerships and implementation) should be applied in District Centres).

User: Mr Drew Stevenson

The need for such consistency is re-enforced by the fact that a similar approach is included in Policy SD9 A which refers to a Town Centre Strategy being produced locally in a way “that is inclusive and representative of the local community.” **I strongly welcome this.**

***I therefore also suggest that** the Mayor gives himself the opportunity of being involved in the preparation of Strategies in International, Metropolitan and Major Town Centres (those that can only be changed via the London Plan), by including wording similar to that in Policy SD1A1 (as proposed to be amended below) in Policy SD8 or SD9.

User: Cross River Partnership

We support the emphasis placed on ‘Local Partnerships and Implementation’. Town centres, as recognised in The London Plan, are areas of density with diverse land-use and a strong commercial presence. Therefore, development and intensification will be more challenging, especially where development threatens to damage London’s rich culture, heritage and character. Local intelligence will be critical to achieving ambitious, yet sensitive intensification, that will prevent the unintentional loss of key economic drivers.

While we welcome this emphasis on town centre partnerships, we ask the Mayor to recognise the diversity and breadth of work undertaken by these bodies. Policy SD9 must reflect that such partnerships can support the delivery of many of the ambitions outlined in The London Plan, from better evening and night-time economies, improved air quality, encouraging sustainable transport modes and protecting London’s heritage. Supporting high street retail remains a core function of these partnerships but their involvement in other elements of the economy and society is varied and bringing their local intelligence to the fore is essential.

We also recommend that, in the context of the delivery of The London, fostering the evolution of these partnerships to include landowners is crucial. In many areas, London’s transformation will be radical, so ensuring there landowners are involved will be essential. This is demonstrated in principle by Policy SD9 C 1) b and c which are only achievable through landowner involvement and demonstrated in practice by the three Property Owner BIDs in Central London, who provide a strategic element to London’s regeneration and renewal.

Such strong partnerships are not the exclusive preserve of Inner London. In Outer London, we note the emerging partnership between the Royal Borough of Kingston Upon Thames and the BID, Kingston First, which includes a Landowners Forum. It is this kind of multi-functional, cross-sector partnership that the Mayor needs to support and foster across the city.

To foster these partnerships, the Mayor will need to explore best practice in various publicprivate partnership models, assess any impediments to their growth and work with various stakeholders to resolve these impediments and promote their growth across London.

User:	Oneill Homer
SD9C Neighbourhood plans (especially business-led) can lead the formulation of local strategies and blend with other local issues, e.g. regeneration.	

User:	Standard Life Investments

Policy SD9 Town centres: Local partnerships and implementation
Policy SD9(C2) encourages local authorities to take a proactive and partnership approach to bring sites forward for redevelopment. This approach is supported in order to ensure that successful development is delivered.

User: Kingston First

Kingston First supports draft Policies SD6, SD7, SD8 and SD9, which relate to the role of neighbourhood, district, major, metropolitan and international town centres. Kingston is an established Metropolitan Centre which performs well, but to remain relevant and viable it must respond to the various challenges facing UK high streets.

The role and function of the high street is changing and town centres must adapt to the evolving consumer expectations. Traditional planning policies have sought to protect retail use but draft Policy SD6 is clear in that a greater degree of flexibility is required These changes may include better infrastructure to support the logistics involved in 'Click and Collect' shopping and greater support for any leisure facilities whtch would support and promote this behaviour, rather than have goods delivered to the home.

User:	Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living

SD9 (90) - Town centres: Local Partnerships and Implementation

Article 4 directions should only be used where appropriate and justified given the need for housing identified within the DLP. Widespread promotion and use of such restrictive policy is likely to jeopardise the delivery of housing targets.

Objection: This policy is not positively prepared and should be amended to remove the encouragement of Article 4 directions.

User:	Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living

We support the diversification of housing uses in town centres and edge of centre for the provision of housing for older people (2.9.5)

Para 2.9.5 of the consultation plan implies that older people's housing could act as a catalyst for regeneration. Policies will need to set out how this can happen and how there could be benefits for the risks taken.

User:	London Borough of Camden

This states that each town centre should have a Town Centre Strategy produced in partnership at the local level. However, the Plan does not say who would produce / lead on them and how they would be funded. The production of comprehensive strategies for all town centres and their implementation would be have substantial and ongoing resource implications. Given the limited availability of resources, boroughs are not in a position to produce such strategies. The GLA should resource additional borough research it seeks to prioritise.

User: HHGL Ltd

Representations to Draft London Plan

The current network of Homebase/Bunnings stores in the UK & Ireland extends to 255 stores. Of these, approximately 30 are located within the London area.
Four of the existing stores in the London area have or are currently in the process of being converted to a Bunning Warehouse. These are the stores at Hanworth, Penge, Walthamstow and Walton on Thames. This investment involves the complete refurbishment of the individual stores and is likely to secure new employment as stores converted to the Bunnings brand see, on average, a 50% increase in staff numbers.

Policies SD8 and E9 of the Draft London Plan relate to retail development. Part 5) a) to Policy SD8 and part 8) to Policy E9 suggest that Borough's, through their Development Plans, should seek to encourage higher density development or the more intensive use of edge and out-of-centre retail sites and retail parks for a diverse mix of uses including specifically new housing. This is expanded further in paragraph 2.8.3, with the proviso that redevelopment should not generally result in an increase in retail floorspace given the town centre first approach.

Our clients recognise the general need for new housing within London and support those policies that seek to increase housing provision on appropriate sites. However, they are very concerned that the policies as drafted appear not to recognise the important role of existing retail businesses on edge and out-of-centre sites and neither do they provide any clarity or commitment to those businesses. For example, it is unclear as to whether this policy approach is seeking to promote the retention of existing retail uses within any future redevelopment schemes and if it is not, what the implications of that approach will be for these businesses. These are businesses, such as Homebase/Bunnings, that perform important roles not only just in terms of providing Londoners with access to bulky comparison goods that cannot be sold or accommodated within existing town centres, but also as a source of a significant number of local jobs.

A policy approach that fails to cater for edge and out-of-centre retail businesses or which failed to address the need for large format retail warehousing, would be inconsistent with the retail policies of the National Planning Policy Framework (March 2012). It would also appear to contradict part A of Policy 9, which suggests that the draft Plan recognises and supports the benefits of a diverse retail sector.

In addition, the statement in paragraph 2.8.2 that edge and out-of-centre retail uses are often car dependent, not sustainable and poorly integrated, is a sweeping generalisation that does not appear to be supported by any specific analysis or evidence.

Bunnings growth (and future investment) is focused on driving energy efficiency, waste reduction and ethical sourcing. Its sustainability policies seek to ensure that the business, moving forward, is socially responsible and environmentally aware. It actively supports local communities and included amongst its recent projects in London was support (from 6 stores) for Bromley in Bloom involving the donation of wheelbarrows to 24 local schools to design and plant. Bunnings is, therefore, highly committed to reducing its carbon footprint and to fully integrating and supporting the local communities that its stores inhabit.

Given the above, our clients would request that draft Policies SD8 and E9, together with their supporting text, be amended to:

· Recognise the important contribution that edge and out-of-centre retail stores make to the comparison offer of individual Borough's, in complementing existing town centres, offering the opportunity for linked trips, providing access to bulky goods that cannot be accommodated within existing town centres and in promoting access for all modes of transport
· Recognise the importance of these retail businesses as a source of a large number of local jobs and the need to protect those jobs and the role that retail warehouses perform given the lack of alternative sites for this form of large format retail use within London
· Confirm that within any redevelopment scheme the existing retail use will be retained as is or reincorporated within the new development and if this is not possible, for planning, operational, design or viability reasons, to include a firm commitment to relocating those businesses to alternative sites

User:	Age UK London - a charity working with older Londoners

POLICY SD9: TOWN CENTRES & IMPLEMENTATION

Policy SD9 Town centres: Local partnerships, COMMUNITY ENGAGEMENT and implementation

A To develop strong, resilient and adaptable town centres, fulfilling their full potential to accommodate growth and development, strategic and local partnership approaches, community engagement, town centre management, business associations and Business Improvement Districts MUST should be supported, and encouraged AND UNDERTAKEN. Each town centre MUST should have a Town Centre Strategy produced in partnership at the local level in a way that is inclusive and representative of the local community.

2) take a proactive PARTICIPATORY and partnership-based approach to bring sites forward for redevelopment, supporting land assembly in collaboration with local stakeholders including, where appropriate, through the compulsory purchase process

User:	Age UK London - a charity working with older Londoners

18. SD9A LINK TO POLICY CHANGE Given the key significance of Town Centres in the Mayor’s Draft New Plan, replacing SHOULD with MUST strengthens the policy and the use of UNDERTAKEN ensures that plans will be carried through.

19. SD9 The addition of Community Engagement in the policy will help to achieve the intentions of policy SD6. Community involvement and the participation of the local voluntary sector will ensure that town centres match local needs and aspirations and the insertion of a participatory approach in SD9C 3 will add to community cohesion.

User:	Regeneration X

2.9.5 Talks about the intensification of town centres for residential development. We are very concerned that TIF has been mentioned as a means of funding delivery with no consideration of its risks. There is no mention of social housing. We do not believe that the blanket policy of intensification of town centres and around transport hubs is deliverable. It seems to have been written by people who do not understand how outer London works, and its does not have public support.

User:	Atkins

Policy SD9 calls for strong, resilient and adaptable town centres, with town centre specific strategies. As acknowledged in the supporting text (para 2.9.1) the unique character of each town centre and the significant changes and restructuring that retail is facing, makes it crucial that a strategy is developed for each town centre. We support the development of town centre strategies that will enable a bespoke approach to the future development and growth of town centres.

User:	Primrose Hill Conservation Area Advisory Committee

SD9 C 1)

We welcome this policy on the introduction of appropriate Article 4 Directions to limit the loss of functioning work-space in specific areas.

User:	Regent's Park Conservation Areas Advisory Committees

SD9 C 1) We welcome this policy on the introduction of appropriate Article 4 Directions to limit the loss of functioning work-space in specific areas.

Policy SD10 Strategic and local regeneration

User: Newham Union of Tenants

Policy SD10 Strategic and local regeneration

We are concerned that ‘strategic and local regeneration’ often means transforming areas traditionally meeting the needs of lower income household, albeit that they may well need better care and attention, services and amenities that meet local needs, into areas more desirable to and eventually to be colonised by wealthier households. The results are increased property values, new shops, services and amenities that meet the needs higher incomes moving in and inevitable displacement of lower income households.

Monitoring is generally that relating to changes in levels of deprivation in lower super output areas. As this can be easily achieve by moving in higher income households into an area, it is hardly an effective or accurate way to assess any benefit to deprived or excluded communities. It is notable that there is a general lack of longitudinal studies that assess the impact on existing communities. The Mayor should requite the latter to be carried out in regeneration areas.

Regeneration plans should be based on grass roots (existing) community based needs assessments of what they perceive to be the problems in their areas and what support or change they feel are needed in their areas – in terms of housing, jobs and training, green, play and social infrastructure.

User:	London Borough of Lambeth

Lambeth notes the definition of Strategic Areas for Regeneration as neighbourhoods within the 20 per cent most deprived in England; and the proposal that boroughs identify other areas where the impacts of inequality are acutely felt as ‘Local Areas for Regeneration’. In Lambeth’s view, the notion of a local area for regeneration is too simplistic and does not adequately reflect the perspective of local communities living in these areas. Lambeth would like to be able to identify and name its own priority areas for intervention, without using terminology imposed by the London Plan.

User: London Borough of Merton

Policy SD10 states that *“Borough’s should 1) identify Strategic Areas for Regeneration (see Figure 2.19) in Local Plans based on a thorough understanding of the demographics of communities and their needs.”*

Object: This policy should be more carefully worded to be clear about what is required from boroughs. It states that “*boroughs should identify Strategic Areas for Regeneration in Local Plans*” but it is clear from both the policy wording above and on the map in Figure 2.19 that the draft London Plan has already identified Strategic Areas for Regeneration.

While we welcome the further opportunity to reduce inequalities, improve livelihoods and tackle deprivation, the draft London Plan proposes an additional 16 substantial Opportunity Areas across London as well as 236 Strategic Areas for Regeneration identified in Figure 2.19. We would welcome GLA investment to enable the successful prioritisation and delivery of both Opportunity Area and Strategic Areas for Regeneration.

User: London Tenants Federation

2.10.1 Policy SD10 Strategic and local regeneration

We are concerned that ‘strategic and local regeneration’ often means transforming areas traditionally meeting the needs of lower income household, albeit that they may well need better care and attention, services and amenities that meet local needs, into areas more desirable to and eventually to be colonised by wealthier households. The results are increased property values, new shops, services and amenities that meet the needs higher incomes moving in and inevitable displacement of lower income households.

2.10.2 Monitoring is generally that relating to changes in average levels of deprivation in lower super output areas. Averages an easily changed as a result of higher income households into an area. It is not an effective or accurate way to assess any benefit to deprived or excluded communities. It is notable that there is a general lack of longitudinal studies that assess the impact on existing communities.

2.10.3 **We propose** that this policy should include that:

- in regeneration area analyses the Mayor and the borough should assess the benefit or otherwise to existing less well-off communities;

- regeneration plans should be based on grass roots (existing) communities needs assessments of what they perceive to be the problems in their areas and what support or change they feel are needed – in terms of housing, jobs and training, green, play and social infrastructure.

User:	Somers Town Neighbourhood Forum

The use of the Index of Multiple Deprivation as the criterion for ‘strategic areas of regeneration’ (2.10.1) is not appropriate – specifically the use of the 20% most deprived classification. The Plan should seek to improve housing according to needs in any/every area of London, not just in places bounded by the IMD. The IMD 20% most deprived status is not an adequate criterion for which area should be designated as appropriate for ‘regeneration’ and, with the exceptional impact of HS2 being felt in Somers Town for the next 20 years, as well as the likely construction of Crossrail 2, Euston Station rebuild, Maria Fidelis Consolidation Project, the British Library Extension and Central Somers Town CIP, it is not appropriate to further burden them with additional significant regeneration in the form of large-scale development.

User:	Environment Agency

We welcome policy point B., and its requirement that development plans and proposals contribute to regeneration by tackling - amongst other matters - environmental barriers. This supports our recommendation above, that environmental risks and opportunities for the Opportunity Areas be identified within this Chapter’s text.

(Please see PDF Appendix A for full detail)

User:	London Borough of Barking & Dagenham

The Council strongly supports this policy. Delivering inclusive regeneration in the borough’s Opportunity Areas will be essential in tackling the specific causes of deprivation in the Strategic Areas for Regeneration shown in figure 2.19. This is at the heart of what Be First has been set up to do to; to ensure no-one is left behind in the pursuit of growth.

User:	London Borough of Brent

The Council supports this policy. The boundaries of this area also coincide with the suggested areas for potential future growth areas which the Council would like to discuss with the GLA related to Staples Corner/Thameslink Brent Cross and Neasden/Dudding Hill Line.

User:	London Borough of Lewisham

We support SD10 as it seeks to tackle deprivation through local regeneration schemes. We are continuously reviewing the borough and key opportunity areas for regeneration, beyond just housing and SD10 is well aligned with our aspirations for Catford town centre.

We recognise that the long-term success of SD10 will be dependent upon major infrastructure investment such as BLE helping to unlock regeneration opportunities to their greatest potential.

User: Save Swiss Cottage

Policy SD10 Strategic and local regeneration
We are concerned that ‘strategic and local regeneration’ often means transforming areas traditionally meeting the needs of lower income household, albeit that they may well need better care and attention, services and amenities that meet local needs, into areas more desirable to and eventually to be colonised by wealthier households. The results are increased property values, new shops, services and amenities that meet the needs higher incomes moving in and inevitable displacement of lower income households.
Monitoring is generally that relating to changes in levels of deprivation in lower super output areas. As this can be easily achieve by moving in higher income households into an area, it is hardly an effective or accurate way to assess any benefit to deprived or excluded communities. It is notable that there is a general lack of longitudinal studies that assess the impact on existing communities. The Mayor should requite the latter to be carried out in regeneration areas.
Regeneration plans should be based on grass roots (existing) community based needs assessments of what they perceive to be the problems in their areas and what support or change they feel are needed in their areas – in terms of housing, jobs and training, green, play and social infrastructure.

User:	London Borough of Bromley

The policy is noted. Bromley has established its own “Renewal Areas” in the Draft Local Plan in response to the current London Plan Policy 2.14.

User: London Councils

Boroughs support the aims of the policy and are working with local communities to identify areas suitable for regeneration. The Strategic Areas for Regeneration map is a useful addition to policy which boroughs can use to facilitate the selection of areas for regeneration. However, this map should not limit boroughs ability to select other areas for regeneration, particularly where new transport infrastructure is planned which can act as a catalyst.

Many boroughs have much experience in carrying out successful regeneration (including meaningful end to end consultation) and it would be useful for the GLA to work with boroughs and produce a best practice guide to local regeneration which highlights best practice and differentiates between local regeneration and the new ‘Better homes for local people’ best practice guide to estate regeneration. This policy of course does not sit alone and all the policies impacting estate regeneration should pull together to achieve the best result for all, including the communities in that area.

User: London Borough of Tower Hamlets

We are supportive of any approach which seeks to increase investment in areas of deprivation. However the London Plan should be explicit that regeneration should prioritise improvements for existing residents and that it encompasses a wide range of activities – not simply whole scale physical changes. We are supportive of the requirement for boroughs to develop locally sensitive policies, and we would focus on ensuring the long term affordability of housing and workspace as well as public realm and infrastructure improvements. It is our view that the supporting text for this policy should stress the broader definition of regeneration more explicitly. This would provide greater clarity on implementation and outcome expectation (for example, in terms of how a reduction in spatial inequalities will be measured).

In addition, the London Plan proposes multiple designations (OAs, SARs and LARs) and there is potential for confusion due to the extent of overlap, especially within Tower Hamlets. As shown on Figure 2.19, the geographical extent of the “strategic areas for regeneration” extends to most parts of the borough (apart from the Isle of Dogs and riverside areas): Tower Hamlets is effectively one designation. The designation of LARs would further add to the complexity of designations. Clarity should be provided on their purpose and the local discretion on how these designations are used and prioritised.

Finally, implementation of this policy is very much dependant on a multi-disciplinary approach to regeneration involving a wide range of partners: it implies that spatial planning has a major role to play in coordinating regeneration activity within regeneration areas. However, many local planning authorities are already overstretched and any coordinating role will require significant additional revenue funding to enable local authorities to effectively carry out this role.

User:	Old Bermondsey Village Neighbourhood Forum

Policy SD10 A B and C should be strengthened / given more weight to ensure boroughs actually undertake meaningful local engagement. Greater transparency should be afforded by these policies whereby viability issues should be discussed strategically and developers be forced to consult with communities “at the beginning” rather than in the superficial way that exists at present - to note: local authorities such as Southwark Council currently place the blame / pass the buck here on the lack of sanctions applicable from the Localism Act’s encouragement / guidelines on this subject.

User: London Borough of Waltham Forest

We support the policy and emphasis on strategic and local regeneration. However, we consider there has been an omission: in Appendix 1 Table A 1.1. Row number 189. In this row Leyton is not considered an area for strategic regeneration. We propose Leyton should be included as a Strategic Regeneration area for the following reasons:

Both our Economic Growth Strategy and adopted Core Strategy have identified Leyton, with Lea Bridge, as a key growth area. Core Strategy Policy CS1 states

there is the ability to deliver around 2,500 new homes. Our regeneration vision for the area, Lea Valley Eastside, states that Leyton has

potential to be an area of significant change, accommodating significant redevelopment. It states that there could be potential for 2,380 new homes.

The area is designated as Housing Zone.

Leyton has the possibility to extend the high street into Leyton Mills, improve connectivity to Queen Elizabeth Olympic Park, enhance the tube station and

public realm, and provide a new neighbourhood at Coronation Square and an enriched food and business offer at New Spitalfields Market.

There is also potential for a new station at Ruckholt Road unlocking opportunities for housing and employment.

Improvements to Leyton Underground Station capacity and possible redevelopment opportunities would allow for further regeneration and growth

within the area.

User:	Royal Borough of Kingston
Support. It is noted that the map is difficult to read due to scaling issues, and seek clarification that the Cambridge Road Estate is identified in Kingston. The areas should be kept under review as pockets of deprivation can change over time.	

User: HFFTRA

Policy SD10 Strategic and local regeneration

We are concerned that ‘strategic and local regeneration’ often means transforming areas traditionally meeting the needs of lower income household, albeit that they may well need better care and attention, services and amenities that meet local needs, into areas more desirable to and eventually to be colonised by wealthier households. The results are increased property values, new shops, services and amenities that meet the needs higher incomes moving in and inevitable displacement of lower income households.

Monitoring is generally that relating to changes in levels of deprivation in lower super output areas. As this can be easily achieve by moving in higher income households into an area, it is hardly an effective or accurate way to assess any benefit to deprived or excluded communities. It is notable that there is a general lack of longitudinal studies that assess the impact on existing communities. The Mayor should requite the latter to be carried out in regeneration areas.

Regeneration plans should be based on grass roots (existing) community based needs assessments of what they perceive to be the problems in their areas and what support or change they feel are needed in their areas – in terms of housing, jobs and training, green, play and social infrastructure.

User:	London Borough of Hillingdon
As noted above, the Council welcomes policies that support the role and function of strong town centres, however these policies are too prescriptive and cannot be practically applied in decision taking. As such, they should be removed from the plan.	

User: Westminster City Council

St John’s Wood Town Centre does not suffer from high levels of deprivation, and should not be identified as a Strategic Area of Regeneration in Appendix 1 on the basis of the administrative boundaries of Lower Super Output Areas, and pockets of deprivation within them. Such boundaries do not relate well to the town centre – they cut through some buildings within the centre, and only a small portion of the centre falls within deprived Lower Super Output Areas. Furthermore, planning permission has already been secured for one of the buildings within the centre (Dora House) that may have previously contributed to IMD rankings. Finally, all local evidence indicates it continues to be a healthy town centre.

It is also questionable if Tachbrook/ Warwick Way merits designation as a strategic area of regeneration. As with St. John’s Wood this arises simply because of part of an LSOA on the periphery of the designated own centre. Again, local evidence suggests it continues to be a healthy town centre.

This draft policy demonstrates the limitations of seeking to impose a rigid, top-down methodology to town centres, particularly one that is triggered simply by a national dataset relating to very small areas. The policy should be reworded so it is closer to Policy 2.14 in the current London Plan, making it clear that it is for boroughs to decide how regeneration priorities should be determined, which parts of their area should be designated as regeneration areas and the best approach that should be taken to addressing the issues in each.

User:	London Borough of Southwark

The council supports the designation of Elephant and Castle, Canada Water, Peckham, Camberwell, Bankside and The Borough and Old Kent Road as Strategic Areas for Regeneration to help tackle impacts of inequality and deprivation and ensuring that regeneration planned for the borough is in collaboration with the local communities who live, work and visit these areas.

All of Southwark's Opportunity Areas are also identified as Strategic Areas of Regeneration. However, London Bridge, Borough and Bankside consist of two town centres and just Borough and Bankside is identified as a Strategic Area of Regeneration. The council cannot identify a discernible difference between these town centres. It is recommended that both town centres are designated Strategic Areas of Regeneration to support the ambition of the overall Opportunity Area.

User: London Borough of Redbridge

We support the policy intent of SD10. Although Ilford's growth potential is recognised through its Opportunity Area status, the London Plan could be more supportive of the ambitions set out in the Ilford Prospectus. As set out earlier, we are happy to work more closely with the GLA on how this can be achieved, recognising the regeneration activity that is currently underway in Ilford.

The policy refers to the importance of development plans and opportunity area planning frameworks in taking an integrated spatial approach to wide a range of issues which exist within strategic and local areas for regeneration. Whilst we support this intention we consider this reinforces the need for an OAPF to come forward for Ilford to enable the Council to deliver change, attract investment and provide certainty to stakeholders and delivery agencies.

User:	London Borough of Wandsworth

Generally supportive of such a policy as it seeks to tackle spatial inequalities by ensuring Local Plans identify Local Areas for Regeneration taking into account local circumstances, demographics of communities and communities needs. It would also contribute to the renewal of town centres in Strategic and Local Areas for Regeneration. However, the Council seeks clarity on whether there will be any criteria to guide Local Plans when identifying Local Areas for Regeneration and developing locally sensitive policies.

User:	London Borough of Harrow

This policy requires boroughs to identify Strategic Areas for Regeneration based on 20 per cent most deprived lower super output areas in England. Within Harrow, these are Rayners Lane Estate (where redevelopment is almost complete) & Woodlands and Cottesmore Estates & Woodlands Drive Estate in Stanmore where there is currently no regeneration plans and which are outside the Opportunity Area. Resourcing will be a significant constraint with respect to the ability of boroughs to proactively progress regeneration programmes (i.e. limited HRA borrowing capacity for physical regeneration and limited revenue budgets to support social/environmental regeneration).

User:	London Borough of Richmond Upon Thames

Generally supportive of such a policy as it seeks to tackle spatial inequalities by ensuring

Local Plans identify Local Areas for Regeneration taking into account local circumstances,

the demographic makeup

of communities and local needs.

User:	London Borough of Havering

Boroughs should identify strategic areas for regeneration based on a thorough understanding of the demographics of the community and their needs.

How much free reign will individual boroughs have to specify these SAR’s if the local needs conflict with the overarching principles for growth in London?

User:	London Borough of Newham
LBN support this policy and it is considered to be complementary to Newham’s Draft Revised Local Plan.	

User:	TUC London, South East and East of England

Policy SD10: Strategic and local regeneration

1. Gross value added per head in NUTS 2 areas across London is incredibly unevenly distributed, with some parts of London having a GVA per head lower than the national average and on a falling trend. There is a particular challenge of raising economic output and building competitiveness and quality employment opportunities in outer London boroughs and promoting greater integration with the economy in the CAZ area.

User: Just Space

SD10 Strategic and Local Regeneration

We object that the collaboration with communities is in text only (2.10.3) and not explicit in policy. Additional text points (2.10.6) could be usefully incorporated into policy together with new points that demolition is not implicit in regeneration and that social infrastructure, local employment and affordable premises including industrial units are also key to successful regeneration.

In further analysis of this policy, It is important to cross-relate with the Good Practice document on Estate Regeneration and Housing Policy H10 as regeneration areas are likely to include council estates.

Thus in the discussion of Policy SD10 (p. 92-3), it is suggested (2.10.3) that “In order to be effective in improving the lives of those most affected by inequality, regeneration initiatives must be undertaken in **collaboration with local communities,** involving a broad spectrum of groups and individuals, to develop a shared vision for the area…. There should be a shared understanding of how the regeneration area needs to change, and how that change will be secured, managed and embedded within and supported by the community. (p. 93-4)”.

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

User:	London Borough of Bexley

Policy SD10 Strategic and local regeneration and associated **Figure 2.19** should make clear that the locations identified on the map are a reflection of statistics rather than a land designation or remove sensitive designated areas such as Metropolitan Green Belt and Sites of Importance for Nature Conservation. A large amount of the mapped Strategic Area for Regeneration in Bexley is Metropolitan Green Belt.

User:	the Camden HS2 Association of Resident's Groups for Engagement (CHARGE)

The use of the Index of Multiple Deprivation as the criterion for ‘strategic areas of regeneration’ (2.10.1) is not appropriate – specifically the use of the 20% most deprived classification. The Plan should seek to improve housing according to needs in any/every area of London, not just in places bounded by the IMD. The IMD 20% most deprived status is not an adequate criterion for which area should be designated as appropriate for ‘regeneration’ and, with the exceptional impact of HS2 being felt in Camden Town, Regent’s Park Estate, Ampthill Estate, Drummond Street area and Somers Town for the next 20 years it is not appropriate to further burden them with additional significant regeneration.

User:	Mr Liam Kelly

Policy SD 10 2.10.3 (p93) in the supporting text should be in the primary shaded section. Adequately resourced and accountable local community participation should form an essential part of the process. Lifetime Neighbourhoods should be central to achieving sustainable development.

User:	London Borough of Ealing

We note that some parts of London have not benefitted from the advantages of the growth of London and are still experiencing deprivation and there is a strong focus on sustainable and inclusive regeneration for the most deprived areas defined as Strategic Areas for Regeneration (Policy SD10).

We welcome the inclusion of, for example, parts of Northolt, Southall and South Acton within the scope of this policy.

User:	Federation of Small Businesses
It is important that established independent small businesses are supported when town centres are renewed.	

User: My Fair London

The Mayor is following recent planning history in adopting these terms, mapping poorer areas of our city and seeking to focus development on them as the solution of London's problems of inequality. (Fig 2.19) The Plan is right that poor neighbourhoods need investment to improve the quality of housing stock, physical infrastructure, connections to other places, schools, community centres and so on. We welcome the Plan's strong commitment to including people in planning and deciding on such schemes (2.10.3 for example).

We would suggest that this commitment be elevated and explicitly included in policy, perhaps policy SD10. Regeneration continues to be a thing that is largely targeted at poor neighbourhoods, and despite the valiant efforts of many planner and local government officers, is too often felt to be 'done to' communities, rather than done for and with them. This draft Plan tries to address this problem and we support it for that.

But although the two are related, and unequal societies tend to have high rates of relative poverty, poverty is a different problem to the problem of inequality. We are primarily concerned with inequality. We support action to reduce poverty, for example the proposals of the London Child Poverty Alliance, but our focus is on inequality, not poverty.

However the plan is silent on the distributional consequences of regeneration, however it is achieved. Successful regeneration will tend to raise the status of a neighbourhood, leading to a relative rise in property values, and over time, the gradual exodus of poorer residents of an area. This kind of urban change is some part of the history of all cities but we should be able to manage it better. Given our concern for the distribution of London's wealth, we suggest the plan should be amended to also include a map of the 20% wealthiest wards, by deprivation, and consider what policies are needed to that these parts of the city also contribute to our overall progress. The inequality that blights our city, and the growing gap between rich and poor, is a problem for these areas too. If we are encouraging more private housing into poorer neighbourhoods, we should at the same time encourage more social housing into wealthier neighbourhoods, otherwise the tendency of our city to segregate itself on economic lines will continue unchecked. Around the world London is known for the relative social mix of its neighbourhoods, but it is the perhaps unintended consequences of the behaviour of our wealthiest fellow citizens that is destroying this precious characteristic of the city. We therefore suggest the Mayor should come forward with an estimate of the amount of new social rented or affordable housing to be delivered in our wealthiest neighbourhoods.

User: Revo

We welcome the continuity in policy to encourage spatial planning at a local level and support the call for all stakeholders to operate in a collaborative way, through pooling resources and creating partnerships.

The Mayor’s Office has significant convening power to bring together the private sector and Local Authorities and we would encourage the Mayor to do so, to create positive partnerships and understanding between all parts of the market.

We support the identification of Strategic Areas for Regeneration through utilising Local Authorities data and understanding of local need and demographics, however we have concerns as to whether many Local Authorities have sufficient resources to do so, and they must be supported by the Mayor’s Office to ensure the ambitious growth agenda is met. Our industry has expertise to assist and we are ready to assist in delivering positive outcomes for regeneration.

User: London NHS Clinical Commissioning Group

Policy SD10 Strategic and local regeneration

The policy helpfully requires boroughs to develop policies and initiatives for Strategic and Local Areas for Regeneration in Development Plans, Opportunity Area Planning Frameworks and town centre renewal programmes. However, as currently worded, there is no requirement for the Mayor to take a strategic role bringing together stakeholders, coordinating investment and focusing regeneration initiatives in these areas. Such an approach would help deliver the Mayor's Health Inequalities Strategy. The policy or supporting text should also refer to the role of estate regeneration to address inequalities. The Government's Estate Regeneration National Strategy (December 2016) includes a good practice guide which sets out key considerations for estate regeneration schemes, including health and wellbeing issues and impacts and includes a Design and Quality Checklist.

User:	Kingston and Surbiton Constituency Labour Party

We welcome the emphasis on sustainable and inclusive regeneration, particularly as it relates to the Cambridge Road Estate in RBK, identified as a strategic area for regeneration. The emphasis on shared understanding and collaboration with local communities (2.10.2 and 2.10.3) is welcome.

User: British Property Federation

We welcome the continuity in policy to encourage spatial planning at a local level and support the call for all stakeholders to operate in a collaborative way, through pooling resources and creating partnerships. We would also encourage the GLA to work with the BPF to facilitate greater and more consistent collaboration between the public and private sectors. The Mayor's office can aid this effort through supporting and facilitating the work we are doing to bring local authorities and private sector organisations together to discuss and debate productive partnerships. We have held successful workshops with local authorities outside London (in Derby, Milton Keynes, and Southampton to date), and will be looking to arrange similar workshops to include local authorities in London.

Whilst we acknowledge the importance of London boroughs utilising their local knowledge and that of their communities to identify Local Areas of Regeneration, we believe the London Plan should be more robust in its prescription of strategic spatial planning. The Mayor has identified some ambitious targets for London over the coming years, and the GLA and mayoral team will be critical in ensuring theses aspirations are achieved. Many local authorities are suffering from budget cuts and under-resourcing, and whilst localised planning and decision making are important to ensure accountability the Mayor must provide a clear framework to for the growth agenda.

We would also encourage local authorities to proactively engage with the real estate industry in their plan making process and when formulating Opportunity Area Planning Frameworks. BPF members and real estate practitioners are able and willing to offer expertise and working experience to help deliver the best outcomes for regeneration. The cumulative lessons learnt by an industry with a market value of 1,662bn, that contributes £95.6bn GVA to the national economy each year, can inform future actions and help to address the spatial inequalities and causes of deprivation that still exist within London.

We acknowledge the importance of creating Great Places alongside the specific development projects that contribute to the built environment and we welcome the focus on protecting and promoting places and spaces that are valued by local communities. Central to this aspiration is relevant stakeholders making a coordinated effort, whether it be in the quality of design and architecture, or the delivery of supporting infrastructure. We launched our BPF Great Places Campaign in October 2017 and would encourage the Mayor and his office to engage with us in furthering the impact of our campaign.

User:	London Wildlife Trust
We welcome the reference to ‘locally-sensitive policies’ (Part C).	

User: London Wildlife Trust

We welcome the reference to ‘locally-sensitive policies’ (Part C). However, we suggest that specific reference to natural spaces is made within the appropriate para 2.10.6, as these are usually high valued by people;

2.10.6 The Areas for Regeneration are home to many established and varied communities, and there is likely to be a strong sense of place, local identity, and character that is reflected in the buildings, streets and spaces in the area, the lives of the people that live there and the activities that take place. Local Plans, Opportunity Area Planning Frameworks, and regeneration strategies should identify, protect and promote the **places and spaces that are particularly valued by local communities,** including cultural venues, heritage assets, community facilities, parks and greenspaces, and social infrastructure, as well as creating new spaces for people to enjoy.

User: Canal & River Trust

The Trust supports the policy requirement that:

“Development Plans, Opportunity Area Planning Frameworks and development proposals should contribute to regeneration by tackling spatial inequalities and the environmental, economic and social barriers that affect the lives of people in the area, especially in Strategic and Local Areas for Regeneration.

However, regeneration areas often contain environmental, cultural and historic assets that can support wellbeing, regeneration and help to develop a sense of place. In the interests of their sustainable development and the wellbeing of their communities, we suggest that an additional point should be added to policy SD10 to require that boroughs:

“D. Develop plans for strategic and local regeneration areas that maximise the benefits of their existing natural, cultural and historic assets”.

This proposed amendment is consistent with paragraph 2.10.6. However, the Trust considers that this point warrants an inclusion in policy.

The Trust’s waterways in London flow through some of the most deprived parts of the city, as is evident from figure 2.19. In 14 of the 15 boroughs that benefit from our waterways the percentage of the population identified as being deprived in any dimension is greater than or equal to the borough average. The Trust is keen to see our waterways make a positive contribution to regeneration and place-making, either through the actions of third parties, which we try to influence as a statutory consultee in the development management process or through local plans, and though the work of the Trust as a developer, including, through our joint venture partnerships, which will continue to deliver new homes and regenerated neighbourhoods. We welcome the Mayor’s recognition that partnership working is essential to delivering regeneration (2.10.3) and we are ready to play our part in partnerships that relate to the regeneration of areas on and around our waterways.

User: Catalyst Housing Limited

STRATEGIC AND LOCAL AREAS FOR REGENERATION

Policy SD10 relates to strategic and local regeneration. It states that Boroughs should identify Strategic Areas for Regeneration in Local Plans, and should seek to identify Local Areas for Regeneration.

Depending upon the timescales for advancing a Local Plan and the period it is expected to cover, it is possible that some areas may need to be identified in advance of the necessary site-specific community engagement having been undertaken to inform decisions on the future of an estate/regeneration area. Great care is needed in the production of Plans to avoid the risk of predetermination. Given the potential for this to be handled in different ways by different Boroughs, we would suggest that the London Plan offers some guidance on this, particularly for areas to be identified where the precise form of regeneration has not been consulted upon.

CHL's comments on draft Policy SD1 relating to Opportunity Areas relates to this policy too, in terms of the potential time lag to delivery.

User: Catalyst Housing Limited

CHL supports the principle of retaining and identifying new Opportunity Areas, given their significant capacity to accommodate growth. CHL also supports the general principle of locating key growth locations in close proximity to existing and/or planning transport infrastructure.

Draft Policy SD1 is based upon the principle of ensuring that Opportunity Areas are planned so as to unlock their full potential for accommodating growth. In order to achieve this, the draft policy and supporting text refers (inter alia) to the following to help to maximise their potential:

- Planning frameworks
- Identifying specific infrastructure requirements
- Integration with Local and Strategic Areas for Regeneration (with cross-references to draft Policy SD10)

- Requiring major investment in transport
- Cross-boundary working within growth corridors

Whilst these are undoubtedly helpful in terms of ensuring the potential of Opportunity Areas is maximised, there is a real risk of the requirements – either alone or in combination – giving rise to at best significant delays to, and at worse entirely inhibiting, delivery. The Plan itself recognises the uncertainty that exists in terms of sources of funding for the infrastructure that is necessary to provide for the scale of growth anticipated.

It has to be assumed that there will be a significant time lag to delivery and as these areas account for a substantial source of housing land supply, there are concerns about an interim strategy, given the need for 66,000 new homes per year, every year for at least 20 years [we note that part B of draft Policy D6, which relates to optimising housing density, gives rise to similar challenges in terms of the time lag between now and the provision of necessary infrastructure]. It is clear that the Mayor acknowledges this risk, given the reference in the supporting text to the potential for a phased approach (also in relation to draft Policy D6 too), as well as supporting text to draft Policy GG4 which identifies Opportunity Areas for longer-term delivery.

Phasing may enable some of the capacity of some Opportunity Areas to be realised earlier on in the Plan, but in general CHL considers it more likely to form a supply of land in the longer-term. The policy requirements and guidance contained within the supporting text relating to Opportunity Areas needs to be very carefully considered, and further information is needed (for example to explain the approach to cross-boundary working) in order for these locations to come forward. For the interim period, the Mayor needs to carefully consider the approach to ensure that opportunities are maximised from other sources of supply.

User: Benhill Residents

We are concerned that ‘strategic and local regeneration’ often means transforming areas traditionally meeting the needs of lower income household, albeit that they may well need better care and attention, services and amenities that meet local needs, into areas more desirable to and eventually to be colonised by wealthier households. The results are increased property values, new shops, services and amenities that meet the needs higher incomes moving in and inevitable displacement of lower income households.

Monitoring is generally that relating to changes in levels of deprivation in lower super output areas. As this can be easily achieve by moving in higher income households into an area, it is hardly an effective or accurate way to assess any benefit to deprived or excluded communities. It is notable that there is a general lack of longitudinal studies that assess the impact on existing communities. The Mayor should requite the latter to be carried out in regeneration areas.

Regeneration plans should be based on grass roots (existing) community based needs assessments of what they perceive to be the problems in their areas and what support or change they feel are needed in their areas – in terms of housing, jobs and training, green, play and social infrastructure.

User: Earls Court Public Sector Tenants' Assoc

We are concerned that ‘strategic and local regeneration’ often means transforming areas traditionally meeting the needs of lower income household, albeit that they may well need better care and attention, services and amenities that meet local needs, into areas more desirable to and eventually to be colonised by wealthier households. The results are increased property values, new shops, services and amenities that meet the needs higher incomes moving in and inevitable displacement of lower income households.

Monitoring is generally that relating to changes in levels of deprivation in lower super output areas. As this can be easily achieve by moving in higher income households into an area, it is hardly an effective or accurate way to assess any benefit to deprived or excluded communities. It is notable that there is a general lack of longitudinal studies that assess the impact on existing communities. The Mayor should requite the latter to be carried out in regeneration areas.

Regeneration plans should be based on grass roots (existing) community based needs assessments of what they perceive to be the problems in their areas and what support or change they feel are needed in their areas – in terms of housing, jobs and training, green, play and social infrastructure.

User: Historic England

We are pleased to note that part C refers to locally sensitive policies for renewal of town centres.

We welcome the supporting reference in the text in para 2.10.5 to enriching the qualities of an area that make it unique.

Para 2.10.6 also makes a welcome statement recognising that regeneration areas are likely to have strong sense of place, local identity, and character, and that Local Plans, OAPFs and regeneration strategies should identify, protect and promote places and spaces that are valued by communities, including cultural venues, heritage assets

User: Orbit

Estate regeneration can play a critical role in challenging deprivation within the Strategic Areas of Regeneration identified and acts as a catalyst to encourage further development. This should be reflected within the policy and supporting text.

Within deprived areas, the provision of mixed and inclusive communities (which is promoted as a key aspiration throughout the Plan) is critical to challenging the social stigma attached to certain locations and helping optimise the regeneration potential. Consequently, this means the requirement under draft Policy H10 for like-for-like replacement is not always possible or desirable on mono-tenure social rented estates where existing density levels cannot be significantly increased. As such, Orbit considers it can be more sustainable in certain instances for the re-provision of social housing required as part of estate regeneration schemes to be dispersed across the borough as part of a programme approach. This will prevent further mono-tenure estates from being created/maintained and whose existence only deepens existing spatial inequalities and social barriers.

User:	Bishopsgate Goods Yard Regeneration Limited

Our client acknowledges the importance of London boroughs utilising their local knowledge to identify Local Areas of Regeneration. However, the draft London Plan should provide the framework and direction of spatial and strategic planning. Many of the local authorities are under resourced, and whilst localised planning and decision making are important to ensure accountability the Mayor must provide stronger policies to give him the tools to lead the growth agenda to ensure the minimum target set are delivered.

User: Camden Town Conservation Area Advisory Committee

General comment 1: As we explained in our introductory statement on Chapter 2, we are very concerned that the definitions of areas for growth, both Opportunity Areas and Strategic Areas for Regeneration are not sufficiently precise. Figure 2.19 is insufficient for clear identification: the uncertainty resulting is harmful to local communities, businesses and industry.

General comment 2: On Strategic Areas for Regeneration we strongly urge reviewing the use of the Index of Multiple Deprivation as the criterion for ‘strategic areas of regeneration’ (2.10.1). IMD is a proportionate rather than absolute index, and so will always have a lowest 20%. Thus, it would be illogical to use IMD based on personal characteristics for decisions on rebuilding houses: with a policy of returning the residents, the IMD would remain unchanged despite the investment. Similarly, there will be confusion between provision of social and rented housing for low-income groups with policies for an area’s economic regeneration. The Plan should seek to improve housing according to needs in any area of London, not just in places bounded by the IMD.
The implication is important for Fig 2.19 and several previous figures. Specifically, the IMD status of areas of Camden Town is not an adequate criterion for which area should be designated as appropriate for ‘regeneration’.

User: Camden Town Conservation Area Advisory Committee

SD10 A 1)
Draft policy: [Boroughs should:] ‘identify Strategic Areas for Regeneration (see Figure 2.19) in Local Plans based on a thorough understanding of the demographics of communities and their needs’

We propose 2 textual amendments to this policy.

Our proposed amendments – reasoning 1: to achieve clarity on the definition of Strategic Areas for Regeneration, to ensure that the Plan is effective;

Our proposed amendments – reasoning 2: to ensure effective collaborative working with local communities. The policy itself needs to embody the admirable insistence on working in collaboration with local communities set out in text 2.10.3. The present wording of policy SD10 A 1) would allow the continued ‘top-down’ approach to regeneration which has been so harmful to local communities.

Our proposed revised text: ‘identify and clearly define the boundaries of Strategic Areas for Regeneration (see overview Figure 2.19) in Local Plans based on a thorough understanding of the demographics of communities and their needs, and through effective collaborative working with local communities’

User: Camden Town Conservation Area Advisory Committee

SD10 A 2)

Draft policy: [Boroughs should:] ‘seek to identify Local Areas for Regeneration taking into account local circumstances.’

We propose 2 textual amendments to this policy.

Our proposed amendments – reasoning 1: to achieve consistency as in our proposed amendment to SD10 A 1).

Our proposed amendments – reasoning 2: to ensure that the admirable statement in 2.10.6 is effective. The statement is that Boroughs ‘should identify, protect and promote the places and spaces that are particularly valued by local communities, including cultural venues, heritage assets, community facilities …’. The policy itself needs to embody this text to be effective as well as consistent.

Our proposed revised text: [Boroughs should] ‘in collaboration with local communities seek to identify Local Areas for Regeneration taking into account local circumstances, including places and spaces, such as heritage assets and community facilities, that are particularly valued by local communities, and which will be recognized as core elements to be preserved and enhanced in any regeneration.’

User: London Borough of Sutton

OBJECT - UNSOUND - NOT JUSTIFIED. The London Borough of Sutton supports the principle of council intervention to reduce inequalities and tackle barriers that affect people's lives and it welcomes an approach which seeks to align local regeneration and investment plans and priorities with those of the GLA. However, the council considers that Policy SD10 - Strategic and Local Regeneration, specifically policy SD10 A(1), is founded on evidence that is too high level and the aims of the policy would be better carried out by individual boroughs. The policy is based on the accompanying Figure 2.19 which identifies the strategic areas for regeneration based on the 20% most deprived lower super output areas in England but this broadbrush approach fails to take into account the individual characteristics of the deprived areas. For instance, the Roundshaw Estate is identified for regeneration but the estate has recently been redeveloped and its deprivation scores arise from low attainment in terms of education and adult skills, which are not directly planning matters. Similarly, the St Helier Estate is identified for regeneration but it is an estate providing good quality social housing and relatively cheap market housing (not flats) and its low scores also arise from poor education and adult skills levels. Areas for regeneration should be a borough matter where the individual circumstances of each area are known and not based on an unrefined deprivation matrix.

Furthermore policy A (1) requires boroughs to identify in their Local Plans Strategic Areas for Regeneration using Figure 2.19. Having said this, the London Borough of Sutton agrees with the aims of policies A (2), B and C. The council considers that policy A (1) is at variance with these, and contradicts rather than complements them. This is the reason for our objection. If this policy were amended to remove that contradiction then the council would support it.

User: Owners and Tenants of Cygnus Business Park

Policy SD10: Strategic and local regeneration

5.6 In principle we support Policy SD10 in relation to the identification of Strategic Areas for Regeneration within the draft London Plan. The wording of Policy SD10 however currently lacks the necessary emphasis on the deliverability, monitoring and review of these areas to ensure that development of an appropriate nature and especially scale actually comes forward within the plan period.

5.7 We are concerned that scant detail is provided regarding the purpose and form of the Strategic and Local Areas of Regeneration and that no mention is made of the relationship with the Plan's albeit extremely limited proposals for estate regeneration in Policy H10. Given that most of these areas will include housing estates this would appear to be a major weakness with the London Plan. It is hard to ascertain to what extent these areas have been assumed by the Mayor to contribute to the housing land supply.

5.8 Moreover, with regard to the Church End Regeneration Area there is nothing in the Plan which sets out a mechanism under which regeneration can actually be assured or effective.

5.9 Therefore, it is hard to ascertain to what extent these areas have been assumed by the Mayor to contribute to the housing land supply and the London Plan should set out which areas are expected to contribute to meeting the housing targets.

5.10 A prime example of the potential ineffectiveness of this policy is demonstrated by policies in the current development plan for Brent relating to the Church End Growth Area. This growth area was established within Policy CP10 of the Core Strategy, adopted in July 2010. Since the time of its designation however, this growth area has consistently underperformed (according to the Council's Annual Monitoring Report) and will not achieve the desired outcome in terms of housing.

5.11 In this instance, land comprising the Cygnus Business Park at Dalmeyer Road, falls between the edge of the Church End Growth Area and existing residential development to the east. It currently comprising an area of established Class B1 uses principally used for B1(a) and B1(c) purposes. Our clients consider that the site is capable of redevelopment to provide mixed uses, retaining and enhancing employment accommodation on the premises to suit current users and current market needs whilst facilitating the conversion/redevelopment of parts of the site to provide much needed residential accommodation (including affordable housing).

5.12 The site is well located, deliverable and available for such redevelopment. As such it represents a logical extension to the Church End Growth Area and provides an opportunity to deliver additional residential development, assisting Brent in delivering its regeneration objectives and contributing towards the Mayor's housing targets in an appropriate location whilst retaining jobs and improving the quality of the present employment offer.

5.13 In light of the above and the national imperative to boost the supply of housing, it is suggested that the following wording be included within Policy SD10 to ensure Strategic and Local Growth Areas are achievable and deliverable; ingrained with the flexibility to meet the shifting needs of a growing community. Part H of this policy should be updated to reflect the below:

H. Boroughs, through Development Plans and decisions, should:
1) identify Strategic Areas for Regeneration (see Figure 2.19)~~ in Local Plans~~ based on a thorough understanding of the area and the demographics of communities and their needs
2) seek to identify Local Areas for Regeneration taking into account local circumstances
3) Clearly set out the deliverable housing, employment and community objectives of each Strategic or Local Area of Regeneration, encouraging mixed use developments that make the most efficient use of land
4) Establish how they will encourage and deliver the growth potential of these areas
5) Monitor and review the progress of each Strategic or Local Area of Regeneration to ensure they are meeting their established targets, taking action where necessary to overcome any barriers, including reviews of designation boundaries (and associated policies) and the encouragement of other appropriate windfall sites not identified in the Development Plan (in line with Policy H1 Increasing housing supply).

5.14 Regeneration proposals at both a strategic and local scale provide an opportunity to re-think how land and buildings are used, leading to a more efficient use of land which can, if delivered appropriately, assist Boroughs in achieving high quality development whilst meeting the Mayor's housing and employment targets. The current wording of his policy is unsound because it is ineffective, suggested changes in line with the above would help ensure the effectiveness and deliverability of the Plan.

User:	North London Waste Authority

We note the conglomeration of strategic areas for regeneration clustered up (based on 20 percent most deprived lower super the Lee Valley and recommend that the NLP includes recognition of the role output areas in England) that the circular economy and resource management can play in the regeneration of the area.

User: Dagenham Dock Limited

Draft Policy SD10 – Strategic and local regeneration

DDL supports the strategic objective of Draft Policy SD10, whereby Boroughs are encouraged to identify Strategic Areas for Regeneration in Local Plans and support the implementation of Opportunity Area Planning Frameworks where relevant. However, it is crucial that the formulation and adoption of these strategic areas by the boroughs does not unduly prolong the planning process, particularly in relation to sites that are already progressing in advance of any future additions by the boroughs to the relevant Development Plan documents. This should be reflected as a clause within Draft Policy SD10.

User:	Footwork Architects Limited

- Include social heritage in the designation of *Local Areas for Regeneration* and *Strategic Areas for Regeneration*

User:	Chairs of Camden's Conservation Area Advisory Committees

SD10 general General comment 1: As we explained in our introductory statement on Chapter 2, we are very concerned that the definitions of areas for growth, both Opportunity Areas and Strategic Areas for Regeneration are not sufficiently precise. Figure 2.19 is insufficient for clear identification: the uncertainty resulting is harmful to local communities.

User: Chairs of Camden's Conservation Area Advisory Committees

General comment 2: On Strategic Areas for Regeneration we strongly urge reviewing the use of the Index of Multiple Deprivation as the criterion for ‘strategic
areas of regeneration’ (2.10.1). IMD is a proportionate rather than absolute index, and so will always have a lowest 20%. Thus, it would be illogical to use IMD based on personal characteristics for decisions on rebuilding houses: with a policy of returning the residents, the IMD would remain unchanged despite the investment. Similarly, there will be confusion between provision of social and rented housing for low-income groups with policies for area economic regeneration. The Plan should seek to improve housing according to needs in any area of London, not just in places bounded by the IMD. The implication is important for Fig 2.19 and several previous figures. Specifically, the IMD status of areas of Camden Town is not an adequate criterion for which area should be designated as appropriate for ‘regeneration’.

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SD10 A 1) Draft policy: [Boroughs should:] ‘identify Strategic Areas for Regeneration (see Figure 2.19) in Local Plans based on a thorough understanding of the demographics of communities and their needs’

We propose 2 textual amendments to this policy.

Our proposed amendments – reasoning 1: to achieve clarity on the definition of Strategic Areas for Regeneration, to ensure that the Plan is effective;

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Our proposed revised text: ‘identify and clearly define the boundaries of Strategic Areas for Regeneration (see overview Figure 2.19) in Local Plans based on a thorough understanding of the demographics of communities and their needs, and through effective collaborative working with local communities’

User:	Chairs of Camden's Conservation Area Advisory Committees

SD10 A 2) Draft policy: [Boroughs should:] ‘seek to identify Local Areas for Regeneration taking into account local circumstances.’
We propose 2 textual amendments to this policy.
Our proposed amendments – reasoning 1: to achieve consistency as in our proposed amendment to SD10 A 1).
Our proposed amendments – reasoning 2: to ensure that the admirable statement in 2.10.6 is effective. The statement is that Boroughs ‘should identify, protect and promote the places and spaces that are particularly valued by local communities, including cultural venues, heritage assets, community facilities …’. The policy itself needs to embody this text to be effective as well as consistent.
Our proposed revised text: [Boroughs should] ‘in collaboration with local communities seek to identify Local Areas for Regeneration taking into account local circumstances, including places and spaces, such as heritage assets and community facilities, that are particularly valued by local communities, and which will be recognized as core elements to be preserved and enhanced in any regeneration.’

User: Mr Gary Hayes

We are concerned that ‘strategic and local regeneration’ often means transforming areas traditionally meeting the needs of lower income household, albeit that they may well need better care and attention, services and amenities that meet local needs, into areas more desirable to and eventually to be colonised by wealthier households. The results are increased property values, new shops, services and amenities that meet the needs higher incomes moving in and inevitable displacement of lower income households.

Monitoring is generally that relating to changes in levels of deprivation in lower super output areas. As this can be easily achieve by moving in higher income households into an area, it is hardly an effective or accurate way to assess any benefit to deprived or excluded communities. It is notable that there is a general lack of longitudinal studies that assess the impact on existing communities. The Mayor should requite the latter to be carried out in regeneration areas.
Regeneration plans should be based on grass roots (existing) community based needs assessments of what they perceive to be the problems in their areas and what support or change they feel are needed in their areas – in terms of housing, jobs and training, green, play and social infrastructure.

User: Mr Drew Stevenson

b) Key spatial areas. A clear commitment to participation is made in Opportunity Areas. Policy SD1 A says unequivocally that “the Mayor will: 1) Provide support and leadership for the collaborative preparation and implementation of planning frameworks…” and Para 2.1.4 clarifies what collaborative means by saying “Whatever model is used, frameworks must be prepared in a collaborative way with local communities and stakeholders.” I welcome and support this.

It would seem entirely logical for such an assurance also to be given in policies for the strategic Areas for Regeneration and within Town Centres. Not to do so could give weight to an interpretation that the Mayor is not proposing such collaboration in those Areas and Centres, because otherwise he would have said so. Whilst that would be perverse, such arguments have been given weight in the past - and in any event the Plan should be clear, not ambiguous, in its intentions.

Para 1.3.5 also says that “The Mayor will co-ordinate investment and focus regeneration initiatives in those parts of London most affected by inequalities, including health inequalities.” His Strategic Areas for Regeneration represent just those areas, as do several of the Metropolitan and Mayor Town Centres.

I therefore suggest that the wording of Policy SD1A1) - as proposed to be amended below - be included in Policy SD10 after A1). This positioning would make it clear that the Mayor will provide support and leadership in *Strategic* Areas for Regeneration (and not in *Local* Areas for Regeneration). The inclusion of this addition to the policy is in fact already justified in Para 2.10.3 which says “…regeneration initiatives must be undertaken in **collaboration with local communities**…” This should be clearly reflected in policy.

...

***I suggest that the phrase “that benefits local communities” is added to the end of SD1 A1)c) and to the end of SD1 B2). It follows that this addition to SD1 A1)c would also apply to the suggested addition of a similar Policy to Policy SD10.

User: Andrea Carey Fuller

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Regeneration plans should be based on grass roots (existing) community based needs assessments of what they perceive to be the problems in their areas and what support or change they feel are needed in their areas – in terms of housing, jobs and training, green, play and social infrastructure.

User:	Oneill Homer

SD10 Neighbourhood plans are very well suited to tackle Local Areas for Regeneration: by providing local communities with a degree of ownership of the project; by sharing the technical evidence to provide a common platform to identify and discount reasonable options; by raising the awareness of local people of the practicalities for delivering viable development; by enabling local communities to innovate to generate options that development partners may have ignored or discounted; by providing an independent examination of the final proposals; and by requiring a referendum to validate the final outcome.

User: Socialist Health Association London

Policy SD10 Strategic and local regeneration

We hope that this will include an increase in local stakeholder involvement.

Working with communities is vital – and not tokenistic.

HOW CAN WE BE SURE THAT LOCAL AUTHORITIES WILL ACT IN LINE WITH REQUIREMENTS?

eg Affordable and accessible housing

Planning in green space

Ignoring GLA safe construction works guidelines etc.

Public Health Penalties where developments risk health of local people

User:	London Borough of Camden

Regeneration offers unique opportunities to make sustainable improvements to people's health and wellbeing. Therefore, it needs to be supported by prospective health impact assessments informed by community involvement.

User:	Age UK London - a charity working with older Londoners

ADD 3): RECOGNISE THAT REGENERATION IS BOTH SOCIAL AND PHYSICAL AND IDENTIFY ASPECTS OF SOCIAL CHANGE AND PHYSICAL TRANSFORMATION, FOR EACH DEVELOPMENT PROPOSAL. (ADD TO POLICY JUSTIFICATION: Commentary on the social and physical aspects of regeneration).

SD10 Adding Criterion 3 enhances understanding of regeneration and goes some way towards guarding against the loss of social capital when existing communities are disrupted.

User:	Age UK London - a charity working with older Londoners

2) seek to identify Local Areas for Regeneration taking into account local Circumstances AND THE NEEDS OF THE LOCAL COMMUNITY.

SD10 2 LINK TO POLICY CHANGE Insertion of ‘needs of the local community’ ties into Policy S1 and improves the chances of achieving the Mayor’s aims for social cohesion.

User:	Regeneration X

Policy SD10 Strategic and Local Regeneration
There is no definition of what Regeneration is and how it differs from development and-redevelopment.

User:	Regeneration X
2.10.3 Talks about Regeneration being done in collaboration with local communities. This collaboration must be real and any scheme not done in this way (in conformation with the Gunning Principles of Public Consultation) must be rejected.	

User:	Primrose Hill Conservation Area Advisory Committee

General comment 1: As we explained in our introductory statement on Chapter 2, we are very concerned that the definitions of areas for growth, both Opportunity Areas and Strategic Areas for Regeneration are not sufficiently precise. Figure 2.19 is insufficient for clear identification: the uncertainty resulting is harmful to local communities.

User: Primrose Hill Conservation Area Advisory Committee

General comment 2: On Strategic Areas for Regeneration we strongly urge reviewing the use of the Index of Multiple Deprivation as the criterion for ‘strategic
areas of regeneration’ (2.10.1). IMD is a proportionate rather than absolute index, and so will always have a lowest 20%. Thus, it would be illogical to use IMD based on personal characteristics for decisions on rebuilding houses: with a policy of returning the residents, the IMD would remain unchanged despite the investment. Similarly, there will be confusion between provision of social and rented housing for low-income groups with policies for area economic regeneration. The Plan should seek to improve housing according to needs in any area of London, not just in places bounded by the IMD. The implication is important for Fig 2.19 and several previous figures. Specifically, the IMD status of areas of Camden Town is not an adequate criterion for which area should be designated as appropriate for ‘regeneration’.

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User: London national Park City Foundation

Strategic and local regeneration, Page 94

LNPCF supports the stated intentions:

2.10.6 The Areas for Regeneration are home to many established and varied communities, and there is likely to be a strong sense of place, local identity, and character that is reflected in the buildings, streets and spaces in the area, the lives of the people that live there and the activities that take place. Local Plans, Opportunity Area Planning Frameworks, and regeneration strategies should identify, protect and promote the places and spaces that are particularly valued by local communities, including cultural venues, heritage assets, community facilities and social infrastructure, as well as creating new spaces for people to enjoy.

LNPCF PROPOSAL: LNPCF proposes that enjoyment is subjective whereas policies which are playing a role in restoring high quality nature are not, and should be part of this policy.

Design: London's form and characteristics - Policy D1, Pages 98 - 100

including places and spaces, such as heritage assets and community facilities, that are particularly valued by local communities, and which will be recognized a

User: Regent's Park Conservation Areas Advisory Committees

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Our proposed revised text: [Boroughs should] 'in collaboration with local communities seek to identify Local Areas for Regeneration taking into account local circumstances,

Policy SI1 Improving air quality

User:	London Borough of Redbridge

This policy is welcomed and the Council agrees with and supports the overall objectives and the general approach being taken by the Mayor.

The draft Redbridge Air Quality Action Plan (2017-2023) relies partly on the mayor's plans for the inner London Ultra Low Emissions Zone (ULEZ), which includes the south west area of the borough up to the north circular. The ULEZ has not been mentioned in Policy SI1 although the plans for its roll-out are made clear in the Mayor's draft Environment Strategy. It would be useful if the ULEZ was included in the supporting text of this policy.

User: London Borough of Wandsworth

The Council supports the draft policy. Air pollution is of significant concern for health and wellbeing for all Londoners particularly for those who are more vulnerable; this includes school children, the elderly and those with illness such as asthma and Chronic Obstructive Pulmonary Disease.

The Mayor should be mindful that policy SI1 A6 may throw a large responsibility back on the Council to demonstrate “equivalent air quality benefits”. If the developer can’t deliver emissions reductions on site, some other AQ benefits will be required off site. In reality this will usually mean that the local authority will be required to provide equivalent Air Quality benefits nearby through S106 agreements. This sets the bar very/unnecessarily high, may be unachievable and may result in S106 being repaid to the developer if challenged. The Mayor should consider revising the wording deleting “equivalent” to read: 6) Development
proposals should ensure that where emissions need to be reduced, this is done onsite.

Where it can be demonstrated that onsite provision is impractical or inappropriate, offsite measures to improve local air quality may be acceptable, provided that air quality benefits can be demonstrated. This will permit the Local Authority to ensure useful Air Quality benefits are achieved without the threat of any monies having to be repaid.

Para 9.1.2 The Council applauds the Mayors intention to “ensure that new developmentsare designed and built, as far as is possible, to improve local air quality and reduce theextent to which the public are exposed to poor air quality. This means that newdevelopments, as a minimum, must not cause new exceedances of legal air quality standards, or delay the date at which compliance will be achieved in areas that are currentlyin exceedance of legal limits”. This is an admirable intention but is difficult to implement in practice. It will be difficult, unless in an Air Quality Focus Area (AQFA), to require that emissions from buildings are reduced to zero; it will be even more challenging to not “delay the date at which compliance will be achieved in areas that are currently in exceedance of
legal limits “ as this is generally the local road network. Unless the new development is car free (and sometimes even if it is), major developments will almost always add to local transport emissions and thereby add to local NO2 exceedances.

User: London Borough of Richmond Upon Thames

The Council supports the draft policy. The whole borough is a AQMA and there are several AQFAs. Air pollution is of significant concern for health and wellbeing for all Londoners particularly for those who are more vulnerable; this includes children, the elderly and those with illness such as asthma and Chronic Obstructive Pulmonary Disease.

The Mayor should be mindful that policy SI1 A6 may throw a large responsibility back on the Council to demonstrate “equivalent air quality benefits”. If the developer can’t deliver emissions reductions on site, some other AQ benefits will be required off site. In reality this will usually mean that the LA will be required to provide equivalent AQ benefits nearby through S106. This sets the bar very/unnecessarily high, may be unachievable and may result in S106 being repaid to the developer if challenged. The Mayor should consider revising the wording deleting “equivalent” to read: 6) Development proposals should ensure that where emissions need to be reduced, this is done onsite.

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emissions and thereby add to local NO2 exceedances.

Achieving car free developments for family accommodation in outer London is still considered unacceptable to developers and unrealistic by the Council (further comments on this issue are in the response to chapter 10. A good example in LBRuT is the Stag Brewery which will add around 850 new residents, 1,200 pupils, a health centre, retail etc. to a road network which already exceeds capacity. The Council believes this policy should stand, but the Mayor should be mindful of its limitations.

User:	Expedition Engineering and Useful Studio

The draft London Plan would benefit from providing clearer guidance and definitions of ‘air quality positive’. In opportunity areas where new populations are being introduce often on brownfield land with existing sources of pollution it would be helpful to understand more clearly how air quality positive is measured.

User:	Friends of Wimbledon Town Centre

Air quality is vitally important to health and welfare and we support any initiatives that represent a rigorous enforcement of anti-pollution measures

User:	London Borough of Harrow

The Council supports this policy.

Further guidance is required with respect to what constitutes Air Quality Neutral and Air Quality Positive.

User: London Borough of Havering

The policy is supported in principle as Havering is committed to securing improvements in air quality in the borough. Havering has published its draft Air Quality Plan for public consultation.

Criteria A 3

The ‘Air Quality Positive’ aim for large-scale redevelopment areas such as Opportunity Areas and developments subject to an Environmental Impact Assessment is supported. The London Plan should provide more information on how it will apply in practice to the design of new developments.

The Mayor should consider the impact and implications for boroughs in terms of how they will resource this further work when resources are already under pressure.

Criteria A (5) and paragraph 9.1.4

The proposed requirement for Air Quality Assessments to be submitted for all major developments and for a preliminary Air Quality Assessment to be carried out before designing the development is supported.

Paragraph 9.1.8

The draft London Plan should recognise that particular care should be taken not only with developments that are in Air Quality Focus Areas but also with developments in any area of existing poor air quality.

The draft London Plan should also recognise that tackling omissions will be costly and there could be additional cost implications for small businesses and fleet operators (including Councils) that may be passed on to end-users / customers.

User: Royal Borough of Greenwich

SI1A(1)(d)

Definition of what constitutes ‘high levels of exposure’ is necessary. Current wording could be interpreted as some exposure over the legal limit values is acceptable.

SI1A(2)

It would be helpful for the policy to acknowledge where there are potential conflicts between design solutions in response to air pollution and other policy requirements (for example, filtered mechanical ventilation can conflict with the requirement for outdoor amenity space). The use of ‘large numbers of people’ is vague and could weaken application of the policy, particularly in relation to protecting vulnerable people.

SI1A(5)

Support the requirement for AQAs to be submitted for all major developments. Clarification is needed to ensure that the policy reflects the requirement of para 9.1.4 that a preliminary AQA should be carried out with the aim of assessing (amongst other considerations) constraints imposed on the site by poor air quality. The inclusion of ‘unless they can demonstrate that transport….’ in the policy wording implies that some major developments could be exempt from the requirement to carry out a preliminary AQA.

User:	Royal Borough of Greenwich

SI1A(6)/9.1.9

Guidance on what will be needed to demonstrate that off-site mitigation/payments are acceptable in lieu of on-site measures should be produced well in advance of adoption of the Plan to enable boroughs to apply this requirement effectively from the outset.

User:	Royal Borough of Greenwich

Support the aim of this, however unless there is a requirement for a cumulative assessment, most developments will not show via their assessments that they are causing new exceedances or delaying when compliance will be achieved.

User: Judith Howard

With 10,000 Londoners dying prematurely every year from air pollution, I support the London Plan policy to improve air quality (SI1). Policy T8 states that ‘The Mayor will oppose the expansion of Heathrow Airport unless it can be shown that no additional noise or air quality harm would result, and that the benefits of future regulatory and technology improvements would be fairly shared with affected communities’. The Mayor should consistently apply this policy across all new infrastructure projects, including the proposed Silvertown tunnel which will increase air pollution in an area that already has illegally high levels.

User:	The Wimbledon Society
Si1: There should be Proposals and funding supports to achieve proper Air Quality standards	

User:	(FOE) Friends of the Earth England Wales and Northern Ireland

Making London’s air fit to breathe requires pollution to be tackled from all sources, whether from infrastructure, transport or new buildings.

User:	London Borough of Enfield

Policy SI1 looks at ‘Improving Air Quality’. More practical details on how this could be achieved are needed, especially where relevant to smaller scale developments. Green infrastructure should be encouraged as a buffer in the Highway. The Air Quality Focus Areas map is useful in showing hotspots for poor air quality levels and high exposure but more is needed on what actions authorities should take in these areas.

User: (FOE) Friends of the Earth England Wales and Northern Ireland

We welcome the reference in Policy SI1 Criterion A that London's air quality should be significantly improved and that exposure to poor air quality should be reduced (and particularly for vulnerable people). This is important and consistent with the requirements of the High Court ruling in November 2016, in the Client Earth case which states: "the Secretary of State must aim to achieve compliance by the soonest date possible, that she must choose a route to that objective which reduces exposure as quickly as possible, and that she must take steps which mean meeting the value limits is not just possible, but likely."1

We consider that the intentions of this policy need to be spelt out more clearly. Air pollution limits apply throughout an Air Quality Zone, London in this case, and air quality must not be worsened if already over limits anywhere in the Zone. Moreover, in our view, air pollution must not be taken from under to over legal limits anywhere in a Zone. It is not adequate to assess whether a scheme would cause a Zone to go from compliance into non-compliance ie for the first time. This position is confirmed in a letter of clarification from the European Commission Environment Directorate (190214) to Clean Air London.2 This states that "…Limit Values must indeed be complied with throughout the territory of any given air quality zone". The letter goes on to state that "where air quality is already good, Article 12 of the Directive applies. This provision spells out in legal terms the "non-deterioration" principle, according to which Member States shall not only maintain the levels below the limit values, but also "endeavour to preserve the best ambient air quality compatible with sustainable development".

We suggest Policy SI1 be strengthened by amending criterion A to address this point: A. London's air quality should be significantly improved and exposure to poor air quality, especially for vulnerable people, should be reduced:

1. Development proposals should not:

a) lead to further deterioration of existing poor air quality **anywhere in London, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits**

b) create any new areas that exceed air quality limits **anywhere in London**,

"(or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits)" - **Remove**

c) reduce air quality benefits that result from the Mayor's or boroughs' activities to improve air quality

d) create unacceptable risk of high levels of exposure to poor air quality

Advice on the approach planning authorities should take with regard to the Air Quality Directive 2008/50/EC is set out in the Legal Opinion of Robert Macracken QC, paragraph 42 which states "Article 13 (1) states that its limit values apply to member states 'throughout their zones'. This must be interpreted to mean in every part of the zones rather than in all the zones. This is the natural meaning of the quoted words. The purpose of these limit values is to protect human health (see for example, Preamble Recitals 1 and 2 and the heading of Article 13). It would not be consistent with that purpose simply to average out levels of pollution within these zones. Very heavy, life threatening pollution could then be tolerated in particular, unfortunate localities." 3

Macracken goes on to state that "Article 13 requires measurement in accordance with Annex III(B)(1)(a). This expressly directs that sampling points be placed both in representative locations and in areas where the highest concentrations occur to which the population is exposed for significant periods. This is directed towards ensuring that both the general and most serious risks to groups of people are actually noted. It does not state or imply that other locations which are not sampling points do not have to comply with the limit value" (paragraph 45). 4 Macracken also makes clear the implications for new development, ie that permission should not be granted for development that would significantly increase non compliance without measures being put in place before the development is undertaken to ensure compliance (Paragraph 50).5

1 (Conclusions, paragraph 95, i)) (https://www.documents.clientearth.org/library/download-info/high-court-ruling-on-clientearth-no-2-vs-ssefra-uk-air-pollution-plans/)
2 http://cleanair.london/legal/clean-air-in-london-obtains-qc-opinion-on-air-quality-law-including-at-heathrow/attachment/cal-304-letter-of-clarification-from-the-commission-190214_redacted-5/
3 https://cleanair.london/legal/clean-air-in-london-obtains-qc-opinion-on-air-quality-law-including-at-heathrow/attachment/cal-322-robert-mccracken-qc-opinion-for-cal_air-quality-directive-and-planning_signed-061015/
4 See footnote 3
5 See footnote 3

User: (FOE) Friends of the Earth England Wales and Northern Ireland

We note that the Mayor has signed up London to the World Health Organisation (WHO) Breathe Life initiative, including meeting WHO standards, and has set out how London currently fails WHO standards for Particulate Matter air pollution (which are tougher than EU ones).6 The draft London Environment Strategy refers to WHO standards. We suggest it would be helpful to refer to these standards in the London Plan.7 In light of our concerns raised above, we suggest Paragraphs 9.1.1 and 9.1.2 be amended as follows:

Recommendation:

9.1.1 Poor air quality is a major issue for London which is failing to meet requirements under legislation, **and World Health Organisation health based Air Quality Guidelines, which London is signed up to meet.** Poor air quality has direct impacts on the health, quality of life and life expectancy of Londoners. The impacts tend to be most heavily felt in some of London's most deprived neighbourhoods, and by people who are most vulnerable to the impacts.

User: (FOE) Friends of the Earth England Wales and Northern Ireland

We note that the Mayor has signed up London to the World Health Organisation (WHO) Breathe Life initiative, including meeting WHO standards, and has set out how London currently fails WHO standards for Particulate Matter air pollution (which are tougher than EU ones).6 The draft London Environment Strategy refers to WHO standards. We suggest it would be helpful to refer to these standards in the London Plan.7 In light of our concerns raised above, we suggest Paragraphs 9.1.1 and 9.1.2 be amended as follows:

9.1.2 The aim of this policy is to ensure that new developments are designed and built, as far as is possible, to improve local air quality and reduce the extent to which the public are exposed to poor air quality. This means that new developments, as a minimum, must not cause new exceedances of legal air quality standards **anywhere in London (the Air Quality Zone). They must also not , or worsen air quality anywhere in London,** or delay the date at which compliance will be achieved, in areas that are currently in exceedance of legal limits. Where limit values are already met, or are predicted to be met at the time of completion, new developments must endeavour to maintain the best ambient air quality compatible with sustainable development principles.

User:	London First

London First is supportive of measures that will improve London’s air quality. However, we are unclear as to how ‘air quality positive’ would be demonstrated/quantified and concerned about potential impacts on viability. We recommend that the GLA undertakes detailed work to develop an evidence base before proposing new policy in this area.

User:	John Innes Society

CHAPTER 9 AIR QUALITY.
We generally support these policies but feel that greater emphasis should be given to reducing air pollution from building works on all developments, large or small, both during and after construction. Air quality conditions near schools and health care facilities needs greater protection. Air pollution from sources other than traffic, needs to be given greater attention.

User: Berkeley Group

10. SUSTAINABLE INFRASTRUCTURE

Air Quality

10.1. We support the Mayor's objective to improve air quality. In order to understand the practical and cost implications of the proposals in policy SI 1 improving air quality, clarification is needed on a number of elements of the policy:

a) A2 what is meant by "make provision to address local air quality." This suggests that measures may be beyond the application site which will have technical, practical and financial implications.

b) A3 the definition of "an Air Quality Positive approach" and the mechanisms to achieve it.

c) A3 In what circumstances emissions need to be reduced, how it is envisaged that this is achieved on site and what measures would be appropriate to do so off site.

10.2. Without this information it is not possible to fully evaluate the implications, feasibility and cost of the policy. The cost implications will need to be considered in the viability assessment.

User:	Rebecca Rose
With 10,000 Londoners dying prematurely every year from air pollution, I support the London Plan policy to improve air quality (SI1).	

User:	TUC London, South East and East of England

Policy SI1: Improving air quality

1. A priority should be improving air quality around schools and nurseries.

User: Just Space

SI1 Improving air quality

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

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

What Needs To Be Done:

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

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

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

Reduce the need for people to have to travel, promote and designate by way routes that have lower levels of pollution for walkers and cyclists, cut road traffic levels and ensure road vehicles are clean (which should mean phasing out diesel altogether), and this means a joined up approach to improving the environment, transport and infrastructure with:

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

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

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

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

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

User:	London Borough of Bexley

The Council welcomes the new Air Quality Positive requirement set out in **Part A(3)** of **Policy SI1 Improving air quality**, and the requirement for Air Quality Assessments for major developments in **Part A(5)**. However, the wording of this policy does not make it clear if the requirements refer to activities because of development (e.g. construction) or the ongoing impacts of the final development, or both. There is also a lack of clarity on the proposal to allow developers to provide air quality mitigation measures off-site if it is not practicable to do so on-site. Not enough detail is provided as to what kinds of mitigation measures are acceptable. The introduction of air quality offset funds is complex and there are concerns about applying this measure to air quality as it will mean that the ongoing issue of air pollution from developments will be difficult to improve. This policy may also enable a breach of EU obligations.

User: Federation of Small Businesses

FSB London supports the principle of improving air quality. No responsible business organisation can condone the use of excessively polluting vehicles or equipment. However, we are concerned about the need to ensure that any improvements in air quality are not achieved at a disproportionately high cost to business – with damaging consequences for jobs, business viability and the economy as a whole.

We believe that the time has come for a grown-up debate on whether the current vehicle charging mechanisms, and future mechanisms, will do more harm than good to London's competitiveness. It is our opinion that these blunt instruments have disproportionate impacts on smaller businesses and that Transport for London (TfL) and the Mayor should act now before more small businesses are priced out of London.

User:	London Healthier Places

This policy is especially welcomed. This is particularly important in areas that already have poor air quality or in the vicinity of sensitive receptors such as schools/health care facilities.

The LHP Network additionally proposes that developments over a certain size consider incorporating internal and external air quality monitoring devices in their design.

User: SEGRO

Policy SI5 – *London's air quality should be significantly improved and exposure to poor air quality, especially for vulnerable people, should be reduced…..the development of large-scale redevelopment areas, such as Opportunity Areas and those subject to an Environmental Impact Assessment should propose methods of achieving an Air Quality Positive approach through the new development. All other developments should be at least Air Quality Neutral.*

It is not considered that this policy clearly defines what an 'Air Quality Positive approach' is. A number of documents published by the GLA previously refer to an 'Air Quality Positive' development as is one that actively seeks to improve the local air quality during the design and operation of the building.

We request that further guidance is provided to define an 'Air Quality Positive' development and set out how this requirement is to be achieved. We consider this requirement will have significant implications for industrial and urban logistics development, and would like the opportunity to investigate this requirement further with sufficient information to make appropriate representations.

User:	Revo

We acknowledge the built environment has a role to play in minimising and mitigating the impacts of development on air quality alongside other sectors and the particular challenges facing London, and our members are already playing a part. A general requirement for development to be Air Quality Neutral is welcome and ensures a reasonable target to work towards.

User:	Doosan Babcock

Comment on 9.1.9:

It is important to ensure a robust process for checking that all possible solutions to compliance are explored before mitigation or offsetting payments are used. Offsetting must be recognised as a last resort and not as a way of avoiding other measures. The installation of low emission technologies can help grow the market for these solutions and make them mainstream, driving further innovation and delivering long-term change, in a way that offsetting cannot.

User: SEGRO

Appendix – SEGRO Proposed Policy Amendments to the Draft London Plan

Policy SI1 Improving air quality

A London's air quality should be significantly improved and exposure to poor air quality, especially for vulnerable people, should be reduced:

1. Development proposals should not:

1. lead to further deterioration of existing poor air quality
2. create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits
3. reduce air quality benefits that result from the Mayor's or boroughs' activities to improve air quality
4. create unacceptable risk of high levels of exposure to poor air quality.

1. Development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality. Particular care should be taken with developments that are in Air Quality Focus Areas or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people.
2. ***[DELETE: 3) The development of large-scale redevelopment areas, such as Opportunity Areas and those subject to an Environmental Impact Assessment should propose methods of achieving an Air Quality Positive approach through the new development. All other developments should be at least Air Quality Neutral.]***
3. Development proposals must demonstrate how they plan to comply with the Non-Road Mobile Machinery Low Emission Zone and reduce emissions from the demolition and construction of buildings following best practice guidance115.
4. Air Quality Assessments (AQAs) should be submitted with all major developments, unless they can demonstrate that transport and building emissions will be less than the previous or existing use.
5. Development proposals should ensure that where emissions need to be reduced, this is done on-site. Where it can be demonstrated that on-site provision is impractical or inappropriate, off-site measures to improve local air quality may be acceptable, provided that equivalent air quality benefits can be demonstrated.

User:	Notting Hill Housing Trust

NHHT support the aspiration of this policy, however we await the proposed further guidance on Air Quality Neutral, Air Quality Positive standards and impact reduction methods, in order to better understand the practical implications for residential developers such as ourselves. In particular we would hope to see further detail as to the GLA’s expectations and/or parameters around the use of off-site air quality improvement measures.

User: Construction Products Association

1. ***Consistency of requirements.*** It is the UK's construction product manufacturing sector that make the majority of the materials and products that go into creating our much needed homes, schools, offices, hospitals, shops, railways and other infrastructure. These products have to move from their site of manufacture to their point of use, either directly or through builders merchants. Most of this transport is by road, although increasing volumes move by rail or water. The links between diesel transport, nitrogen dioxide and public health is now very well established and we understand the need to find quickly a solution. Such solutions at the London level need to be part of a consistent national strategic approach to Air Quality.

2. Manufacturers, inevitably, need to deliver materials and products to numerous construction sites across numerous parts of the city. It is essential therefore that emission requirements across different local authority areas are harmonised and consistent. Trying to respond to an array of differing uncoordinated local and city requirements when you are a national business would be highly confusing and inefficient. The London Plan therefore needs to sit within a national framework, and in addition be in accordance with related regulatory requirements such as for noise and environmental permitting which can put time-sensitive limitations on deliveries. Having clear mechanisms of stakeholder engagement is essential within this national-local dialogue.

3. ***Time Sensitivity.*** Many construction-related deliveries must be at specific times within the daily construction process, such as for ready-mixed concrete which will require pouring at specific points within the construction process. This may need to be done several times a day so limiting access to areas will need to be acutely aware of this requirement. Such time sensitivity will need to be part of the planning process.

4. ***Vehicle Replacement and Supply.*** Moving from current diesel vehicles to lower emission vehicles is a path of change that is already in progress. New HGV vehicles purchased are all EURO V1 standard as this is the only type now sold. Currently, there is a 5-6 month waiting period between ordering and receiving a new vehicle. This reality places a time lag on any proposals to speed up the purchase of EURO V1 vehicles as the capacity of HGV manufacturers to increase production to meet a peaked demand is likely to be limiting. Currently, large fleets tend to have about an 8 year replacement cycle. These vehicles are then sold on to much smaller operators, often SMEs and family run transport businesses who make up a large percentage of the nation's transport distribution sector. Means of helping these SMEs to shift to lower emission vehicles will need addressing, be it financial or technical.

User: British Property Federation

We acknowledge the significant role that the built environment will play in minimising and mitigating the impacts of development on air quality. This is of course alongside the significant mitigation that will be required within the transport sector. To this end, the increased focus on addressing London's air quality issues through a general requirement for development to be Air Quality Neutral is welcome. This is an aspiration that although challenging, will ensure a reasonable target to work towards. However, policy SI1 makes reference to a requirement for large-scale development areas and developments subject to Environmental Impact Assessments to propose methods of achieving an Air Quality Positive approach. This target will prove challenging. With a commitment to optimising densities within areas such as transport hubs, the likely impacts of external air quality on internal readings may increase and proximity of new development to sources of pollution will narrow respectively. Further, the increased density of development in certain areas and requirements for complex engineering solutions may limit the scope to include measures that positively impact air quality. We therefore ask that policy SI1, A, 3) be reworded to the following effect:

"*The Development of large-scale redevelopment areas, such as Opportunity Areas and those subject to an Environmental Impact Assessment should propose methods of achieving an Air Quality Positive approach through the new development* ***where possible, subject to technical guidance and feasibility****. All other development should be at least Air Quality Neutral.*

In addition, we express some concern over the viability analysis conducted in relation to Policy SI1. The *London Plan Viability Study Technical Report (Dec 2017)* states that the associated costs have been tested, however no evidence is available for these costs. We suggest that additional analysis is conducted across the strengthening of policies relating to the provision of Sustainable Infrastructure.

We would also encourage a grater level of consistency across the policies relating to sustainable infrastructure. Gas powered CHP should for instance be discouraged as a carbon reduction technology given the likely associated reductions in air quality.

User: Canal & River Trust

The Trust supports the key aim that the Mayor has set out in his Draft Environment Strategy of reducing the exposure of Londoners to harmful pollution. We commented in our response to that strategy (appendix C) on how we consider the Trust's waterways in London help to support low emission living and set out our concerns about the Mayor's proposals for new regulation related to waterway emissions.

We have no specific comments to raise on policy SI1 but would draw the Mayor's attention to comments that we have made in relation to waterway canyons (policies D7 and D8) and the provision of on-shore power connections to residential moorings (policy SI17)

User: London Environment Directors' Network (LEDNet)

Policy SI1 Air quality

We welcome this policy, but we note that it requires clarification on:

- what is meant by 'high levels' of exposure to air pollution in A 1) d);
- the fact that any exposure over legal levels is unacceptable;
- the air quality positive policy;
- where on-site provision can be considered impractical or inappropriate;
- what off-site mitigation measures would be considered appropriate if on-site is impractical or inappropriate; and
- the application of the air quality offsets policy.

Cumulative impacts should be addressed, for which we propose the following wording:

A

London's air quality should be significantly improved and exposure to poor air quality, especially for vulnerable people, should be reduced:

1) Development proposals should not:

a) lead to further deterioration of existing poor air quality**, including via cumulative impacts**

We also propose the following amendments, which would a) revert to use of the Air Quality Management Areas framework, rather than Air Quality Framework Areas that focus on TfL routes and omit other areas with exceedances, and b) avoid unacceptable impacts on vulnerable groups:

A

2) Development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality. ~~Particular care should be taken with d~~**D**evelopments that are in Air Quality ~~Focus~~ **Management** Areas **should not negatively affect the health of people using these areas through increased air pollution, especially those** ~~or~~ that are likely to be used by ~~large numbers of people particularly~~**individuals who are particularly** vulnerable to poor air quality, such as children or older people.

We welcome policy A 5) and recommend that it is robustly introduced without pre-emptive caveats:

A

5) Air Quality Assessments (AQAs) should be submitted with all major developments~~, unless they can demonstrate that transport and building emissions will be less than the previous or existing use~~.

We would support specific proposals around enclosure of polluting or dusty activities on waste and industrial sites (London Environment Strategy proposal 4.2.3e), and methods to address emissions from emergency generators (particularly diesel generators).

User:	London Wildlife Trust

We welcome and support Policy SI1. In para 9.1.1 we recommend that reduction in harm to biodiversity and improving ecological integrity are also listed as additional benefits of reducing air pollution.

User:	Jayshree Bakrania

Clean Air

With 10,000 Londoners dying prematurely every year from air pollution, I support the London Plan policy to improve air quality (SI1).

User: Catalyst Housing Limited

AIR QUALITY

CHL considers that the requirement in draft Policy SI1 A (3) for the development of large-scale redevelopment areas to be Air Quality Positive may be challenging to achieve. Whilst it is good practice for this to be the target, there needs to be some flexibility to achieve Neutral, if Positive is demonstrably not reasonably possible. We also note that 'Neutral' and 'Positive' are not defined within the draft policy, and this needs to be introduced so that it is clear how the policy tests are to be measured.

User:	The Crown Estate
Air Quality – The policies are positive from an environmental point of view but greater clarity is required on what, for example, Air Quality Positive means in practice. It is not clear how this will be quantified, and how schemes will demonstrate this. This should be addressed.	

User:	Living Streets
We strongly support policy SI1.	

User:	Brixton Society

SI1, Air Quality: This is an acute issue in our area, particularly with the Town Centre straddling the A23, where annual exposure limits were exceeded within one month.
The Mayor should provide more detailed guidance on good design practice through a SPG. In the interim, in Air Quality Focus Areas (fig.9.1):
• Living accommodation should be sited away from the roadside and be arranged as dual aspect to allow natural ventilation from the rear or side.
• Street or building configurations should be avoided which create a canyon effect or otherwise result in concentrations of air pollution which is unable to disperse easily.
• CIL funds should be made available for measures to mitigate or reduce air pollution. Section 106 contributions should be sought from developments with potential to raise air pollution or obstruct dispersal of local concentrations.

User: Silvertown Homes

We agree that poor air quality is a major issue for London which is failing to meet requirements under legislation. We therefore support the Mayor's dedication to improving air quality for Londoners and recognise the need for development proposals to use solutions to prevent or minimise increased exposure. A careful balance of priorities however needs to be struck. Seeking Air Quality Neutral (or even positive) has an impact of achieving zero carbon. Solutions often add to energy consumption.
The supporting text to Policy SI1 also suggests the introduction of offsetting payments (similar to zero carbon payments).

The policy wording as currently drafted is confusing. It calls for large-scale development areas to propose methods of achieving an Air Quality Positive outcome and states that all other developments should be at least Air Quality Neutral. Largescale is not defined. This must be addressed.

This policy should also provide a clearer distinction between the construction phase of development proposals and the end state of the finished product.

As per zero carbon, the costs of any offsetting payments will have to be taken into account by the decision-maker when assessing scheme viability. This may have implications for the delivery of other objectives, including affordable housing. Furthermore, this policy should include a requirement for Boroughs stating how, where and when they will spend the payments.

User:	London Property Alliance
Scope of policy may be too wide / applicable to too broad a range of size of proposals.	

User: London Property Alliance

The Alliance supports introducing reference to improving air quality within Policies SD4.

As set out elsewhere, regarding cumulative impact, we do consider it essential that there is a clear and comprehensive assessment of the potential cumulative impact of additional air quality planning policy requirements on development. In some cases – very much depending upon the form and content of both the development proposed and the existing land uses on a site – achieving air quality positive can impose a significant additional cost upon development.

A clear statement is required regarding the relative priority to be placed upon securing air quality neutral / positive within the CAZ, with respect to other priorities.

We are concerned that Policy SI1, which relates to air quality in more detail, does not distinguish clearly between development of different sizes. A large-scale, strategic development within an Opportunity Area will have a very different effect upon air quality to a proposal for minor alterations to an existing building. The requirements of Policy SI1 will not be achievable for all small scale proposals. The policy should distinguish between development of different scale more clearly.

Conclusion

The Alliance considers that reference to “local context” at policy D1(B)(1) could potentially limit the optimisation of development sites; it is therefore proposed this policy is amended.

The Alliance recognise that design review panels are successfully used in some parts of London, however, the Alliance does not consider it appropriate for the Plan to set out within policy the procedural steps that Boroughs should follow in giving pre-application advice and determining applications. An amendment to Policy D2(F)(2) is proposed to reflect the often large scale nature of buildings in the Cities of London and Westminster.

The Alliance supports the principle of the urban greening policy, however the policy is non-strategic and detailed and we are concerned that it cannot be properly applied to CAZ sites.

The Plan does not address sunlight and daylight; the Alliance suggests that additional policy could helpfully be provided to encourage a more site-specific approach to sunlight, daylight and its effect on residential amenity.

User:	PAFH - Physical Activity for Health (London Sport)

All policies that aim to improve air quality in London have our full support. Poor air quality is known to disproportionately affect those experiencing health inequalities, children and young people, and those with long-term conditions; all groups typically less likely to be physically active. Policies which improve the environment for people from these groups to be active in are welcome.

User: Peter Lawrence

With 10,000 Londoners dying prematurely every year from air pollution, I support the London Plan policy to improve air quality (SI1). Policy T8 states that ‘The Mayor will oppose the expansion of Heathrow Airport unless it can be shown that no additional noise or air quality harm would result, and that the benefits of future regulatory and technology improvements would be fairly shared with affected communities’. The Mayor should consistently apply this policy across all new infrastructure projects, including the proposed Silvertown tunnel which will increase air pollution in an area that already has illegally high levels.

User:	Bishopsgate Goods Yard Regeneration Limited

Our client supports the aspirations of the policy by improving the quality of air for all Londoners. However, the policy notes that large-scale development areas, such as Opportunity Areas and those subject to Environmental Impact Assessment should propose methods of achieving an Air Quality Positive approach through the new development. It is considered that it will be extremely challenging to meet this target. With a commitment to optimising densities within Opportunity Areas, the likely impacts of external air quality on internal readings may increase and proximity of new development to sources of pollution will narrow respectively. Furthermore, it is not explained how an Air Quality Positive approach would be demonstrated/quantified, nor have the likely costs associated with the measures to achieve Air Quality Positive been assessed sufficiently. We therefore consider that this policy in its current form is not justified or effective and request that it is removed.

User: London Borough of Sutton

SUPPORT WITH CONDITIONS. The London Borough of Sutton supports Policy SI1 as it addresses the urgent need to improve air quality across London, particularly in areas of high human exposure. The policy goes significantly further than the existing London Plan to ensure that all developments are least ‘air quality neutral’ and incorporates design solutions to prevent or minimise increased exposure within Air Quality Focus Areas and other areas used by large numbers of people vulnerable to poor air quality. The further policy requirement for large scale redevelopments to demonstrate an ‘air quality positive’ approach involving a range of measures designed to actively reduce air pollution is strongly welcomed, although it would be helpful to include a more precise definition of ‘large-scale redevelopment areas’ to ensure that boroughs are in a stronger position to enforce this approach through the development management process.

Further details should be provided on the range of off-site air quality mitigation measures that could be implemented by developers where it is not practical to do so on-site. The use of offsetting payments for funding such offsite measures as mentioned in Paragraph 9.1.9 should not be encouraged since this would enable polluting developments to proceed and thus slow progress towards meeting the Mayor’s air quality objectives across London.

The supporting text to Policy SI1 would benefit from more cross-referencing to other parts of the plan which will have an essential part to play in achieving an improvement in London’s air quality, such as the emerging London Plan policies for urban greening (Policy G5), energy infrastructure (i.e. NOx emissions from CHP plants) (Policy SI3), assessing and mitigating transport impacts (T4) and promoting healthy streets (Policy T3).

User: ClientEarth

Overall, we are pleased to see that the Mayor recognises that tackling London's illegal and harmful levels of air pollution is a key priority for himself and the capital. He has made some bold decisions and taken welcomed action in just his first 18 months with the introduction of high pollution alerts and the Emissions Surcharge and the ambition to expand and accelerate the introduction of the Ultra Low Emission Zone (ULEZ).

We broadly welcome the policies on air quality set out in the London Plan but want the Mayor to commit to ensure that it reflects the legal tests as set out in the ClientEarth No.2 judgement. This includes the need to take action that ensures that London complies with legal limits of nitrogen dioxide in the shortest time possible. In addition, and of particular relevance to the London Plan, action needs to be taken urgently not only with the aim to deliver compliance by a particular date but with the aim to reduce people's exposure wherever legal limits are breached in the Greater London Zone.

The London Plan should also support the ambitions set out in the Mayor's Transport and Environment strategies. The Mayor has rightly identified motorised traffic as the main source of the city's illegal and harmful levels of air pollution that there is not just a need to reduce emissions from the transport network but also the need to reduce the number of vehicles on the capital's roads. Increasing uptake of public transport and active travel choices and reducing the number of vehicles on London's roads will be key to this. For these strategies to succeed the London Plan has to provide a definite framework to reshape how Londoners live and work in the capital and set the capital on the path to a zero emissions future.

The Mayor also needs to ensure that energy policy does not undermine any air quality improvements delivered by transport. We are especially worried about decentralised energy systems, such as gas engine Combined Heat and Power (CHP)), that could contribute to local sources where people live and work. The Mayor should consider reviewing the heat/energy hierarchy through consultation. Any air quality policy in energy should apply London-wide rather than just in areas exceeding legal limits. Otherwise we could lose improvements the Mayor has delivered.

User: Argent (Property Development) Services LLP

However, there are a range of new policy requirements in the draft Plan which will significantly add to the existing challenges of redevelopment within the OAs and we urge the Mayor's team to review these carefully. Without the following changes, we consider that the London Plan has not been positively prepared consistent with the NPPF:

1. ***Draft Policy SD1 (A5)***

This policy requires the maximisation of affordable housing. However, it should be revised to be 'maximum reasonable' consistent with viability and deliverability considerations as required by paragraph 173 of the NPPF. That paragraph states that ….*'the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.'*

1. ***Draft Policy H6 (Threshold approach to applications) & supporting text at para 4.6.13***

Argent welcomes the principle of a localised affordable housing threshold approach in OAs, however, there are similar concerns to those relating to draft Policy SD1, and the policy should not as a default set a threshold which seeks to increase affordable housing provision 'beyond 35% where possible'. As explained above, delivery of housing including affordable housing is challenging in OAs and local thresholds should be informed by each Borough's own assessment of what can be achieved in that area, taking into account of viability, deliverability, local needs and other requirements, consistent with paragraphs 47 and 173 of the NPPF. By way of an example, in Tottenham Hale LB Haringey is successfully implementing a 'portfolio approach' to affordable housing which responds to each site's specific characteristics while targeting a borough-wide figure of 40% (as set out in their adopted Local Plan). This approach means that affordable housing delivery can vary from site to site with sometimes lower than the overall policy target, taking account of the impact of other non-residential uses (health centre, education uses, social and community uses, work space) on the ability to reach the levels of affordable housing that would be possible on similar sites if they were purely residential. Further, it allows the tenure mix to respond individually to different sites across that area so, for example, in the new mixed-use District Centre, the predominant tenure mix is identified as home ownership or private rent with a minimum 25% affordable low cost ownership homes. Council land value in the District Centre can then be used to further supplement affordable homes, including higher proportions of homes for rent, in other parts of the Housing Zone, such that overall, LB Haringey will achieve their borough-wide target of 40%. Such a successful approach should be supported by the new London Plan and we would urge the Mayor's team to ensure that the text of the plan facilitates its use elsewhere.

1. ***Draft Policy SI1 (A3) Improving Air Quality***

This requires development in OAs to propose methods to achieve an Air Quality Positive Approach. The `supporting text (9.1.3) states that there should be 'an aim to be air quality positive' with reference to examples of low or zero emission heating and energy. However, such requirements are already covered by policy SI2 (minimising greenhouse gasses) and there is no justification for a different approach to OAs or whether the policy will be effective. Consequently, Argent consider that the requirement should be deleted.

Pages 28 to 56 provide background commentary on the priorities for the opportunities with the OAs grouped along transport corridors. The commentary on each of the OAs is not consistent and is insufficient, and therefore not effective, to adequately set the necessary strategic direction for these important areas. Using Argent's interests as an example, there is currently very limited commentary on the Brent Cross/Cricklewood OA and none at all on the King's Cross or the Isle of Dogs and South Poplar OAs. Contrast this with the Lee Valley OA which has a specific heading with a page of text providing context and objectives. The text should be comprehensively updated to ensure that each OA has commentary on its role, function, the current status of each OAPF.

The Draft London Plan refers to the Isle of Dogs Opportunity Area (OA), but should ensure this is updated to reflect the Isle of Dogs and South Poplar.

User: Argent (Property Development) Services LLP

Draft Policy SI1: ‘Improving air quality’

We do not consider part A 3) of draft policy SI1 and the associated supporting text in para. 9.1.3, which cites OAs specifically, to be justified. It is not explained how an Air Quality Positive approach can be measured and does not consider the likely costs associated with the measures required to actively reduce air pollution. The measures cited also potentially duplicate what is required by other policies, particularly SI2. As stated above, OAs are already under significant pressure to deliver housing and other infrastructure. The complexities around development in these areas need to be an important consideration and it is important that new requirements don’t unnecessarily duplicate other policy requirements or impose significant burdens on delivering successful regeneration.

User: Persimmon Homes

The policy is unsound because it does not clarify what is sought and risks implementation of the plan

The Policy recognises that it may not always be possible in practice for developments to achieve Air Quality Neutral standards or to acceptably minimise
impacts using on-site measures alone. In such instance, it refers to the need for additional mitigation or offsetting payments. No detail is provided with regards
offsetting payments, deferring such matter to ‘further guidance on Air Quality Neutral and Air Quality Positive standards (para 9.1.11).

This is an additional cost to development. The cumulative impact on development of all existing and proposed standards, including SPD’s, needs to be assessed. As recognised in para 173 and 173, the cumulative impact of these standards and policies should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle.

User:	Durkan

Policy SI1 (Improving air quality) is generally supported; however, the policy’s supporting text outlines that further assessments should be carried out as the design evolves to ensure that impacts from emissions are prevented or minimised as far as possible. It is considered that further assessments have the potential to be overly onerous in addition to the quantity of technical sustainable reports currently already required to be submitted with planning applications.

Therefore the requirement for further assessments should be removed from Policy SI1.

User: London Borough of Newham

Policy SI1 – Improving Air Quality

LBN generally support this policy given the clear need to improve London's air quality. However, given the opportunity presented by a Pan-London policy that sets new development norms, we have some concerns over the effectiveness of AQN+AQP policy firstly, given that it is based on last lawful use (part 5) given the amount of brownfield land that is now unused or underused (and causes no air quality harm) the policy could perversely result in a worsening of AQ.

Secondly, the policy misses an opportunity to set specific and meaningful actions. It would be more effective if the London Plan prescribed or referenced expected minimum standards, as it does for example with housing design. This could include ultralow NOx combustion or equivalent on all development. Leaving it as a target based approach just leads to consultants arguing over the likely impact of a development with LPAs under- resourced to counter these arguments. Any guidance produced (as referenced in 9.1.11) should include assessment templates to help standardise approach across London and minimise developer pushback.

User: Croydon Limited Partnership

Policy SI1 aims to ensure that new developments are designed and built, as far as is possible, to improve local air quality and reduce the extent to which the public are exposed to poor air quality. CLP welcome this focus on addressing London's air quality issues. However, Part A(3) makes reference to a requirement for large-scale developments such as those within OAs, to propose methods of achieving an Air Quality Positive approach.

It is considered that it will be extremely challenging to meet this target. With a commitment to optimising densities within OAs, the likely impacts of external air quality on internal readings may increase and proximity of new development to sources of pollution will narrow respectively. Furthermore, it is not explained how an Air Quality Positive approach would be demonstrated/quantified, nor have the likely costs associated with the measures to achieve Air Quality Positive been assessed sufficiently. We therefore consider that this policy in its current form is not justified or effective and request that it is removed.

User:	Kesslers Stratford Limited

In relation to part A 3) of draft policy SI1 and the associated supporting text in para. 9.1.3 which cites Opportunity Areas, this requirements has not been justified having regard likely costs associated with the measures to achieve Air Quality Positive.

User:	Clarion Housing Group

The Mayor’s greater focus on air quality is welcomed. More detail is needed to define “Air Quality Positive” scheme to help drive designs in the right direction from concept stage onwards.

Clause SI 1– A3) Clarify: ***Guidance will be provided what measures will be taken to constitute an air quality positive development.***

User: Brent Cross Cricklewood Development Partners

Policy SI1 aims to ensure that new developments are designed and built, as far as is possible, to improve local air quality and reduce the extent to which the public are exposed to poor air quality. The DPs welcome this focus on addressing London's air quality issues. However, Part A(3) makes reference to a requirement for large-scale developments such as those within OAs, to propose methods of achieving an Air Quality Positive approach.

It is considered that it will be extremely challenging to meet this target. With a commitment to optimising densities within OAs, the likely impacts of external air quality on internal readings may increase and proximity of new development to sources of pollution will narrow respectively. Furthermore, it is not explained how an Air Quality Positive approach would be demonstrated/quantified, nor have the likely costs associated with the measures to achieve Air Quality Positive been assessed sufficiently. We therefore consider that this policy in its current form is not justified or effective and request that it is removed.

User:	Alzheimer's Society

1. Research indicates there is a link between air pollution and dementia. A study of 6.6 million people from Canada published in 2016 reported a potential link between dementia and living close to very busy roads[1]. The study found that those living within 50 metres of a major road were 7% more likely to develop dementia than people living more than 300 meters away. This study doesn't prove that air pollution causes dementia. However, it does suggest that the study of air pollution and dementia should be prioritised for future research. As London looks to tackle air pollution, we hope to see this explicitly used as part of the increasing evidence base around the impact of pollution on health.

[1] https://blog.alzheimers.org.uk/research/living-near-busy-roads-increase-risk-dementia/

User: BAE Systems

Improving air quality and minimising emissions (Policy SI1 / Policy SI2)

Generators for construction are a huge contributor to emissions from Non-Road Mobile Machinery (NRMM) and there is already a plan for a NRMM Low Emission Zone. **Hybrid generators are becoming commercially available and these should be considered as part of the NRMM LEZ.**

We are working with our partners to bring our specialist hybrid technology and our experience adapting our solutions to the development sector. **The Mayor, the GLA and London councils should seek to encourage developers - whether through policy or informally - to make use of hybrid generators in order to lower emissions from stationary power on development sites.**

User:	Bexley Natural Environment Forum

Policy SI 1 – BNEF fails to see how this can be achieved – more housing will unfortunately lead to more cars and therefore more pollution. As previously mentioned it will take a drastic change in people's attitudes and draconian measures to make people use public transport, the judicious introduction of more double yellow lines on bus routes would be a start.

User: Arup Building Engineering Team

We strongly support improvements to external air quality and note that with respect to buildings this obviously has the potential to improve the internal environment and ability to naturally ventilate. We to refer to CIBSE's comments on the specifics of the quantitative targets.

We would like to see an emphasis also on internal air quality, particularly as we spend 90% of our time indoors. We would welcome leadership from London on the question of internally generated pollutants which are currently unregulated by the national government. We would also welcome leadership on domestic ventilation rates, for which the regulations are incredibly outdated.

Approved Document F of the building regulations for homes requires ventilation rates below those outlined as good practice by other industry standards. There is very little consideration of controlling sources of pollutants from construction materials and design rates are often not achieved in practice as a result of incorrect installation, commissioning and maintenance.

Productivity can be improved by 8-11% as a result of better indoor air quality[1] (IAQ). The health effects most strongly linked to emissions from construction materials and furniture are allergic and asthma symptoms and odour and irritation[2]. Controlling emissions from such materials is key to reducing exposure, thereby improving occupant health, wellbeing and productivity. The approach to emissions from building fabric and content in Approved Document F is that if the ventilation rates are adequate, then emissions from materials

and occupant activities will not build up to harmful levels [ADF 4.7, 4.9, 4.10]. However, it has been demonstrated[3] that ventilation is often far from adequate. Consequently, levels of volatile organic compounds (VOCs) and formaldehyde can easily build up to harmful levels. Controlling such emissions at source reduces the risk of irritating levels of such compounds

For example, there is no building regulation limit on formaldehyde emissions, despite the fact that there is a suggested limit by WHO of 100microgram/m^3, above which it may cause nose and throat irritation. This limit is mentioned in the Building Bulletin 101 – Ventilation of School Buildings, but not under the general Building Regulations. There are however, formaldehyde emissions limits, for certain product types, such as timber based products in European product standards. Typically the requirement is for products to meet the E1 classification to EN771-1. The only limits mentioned in Building Regulations under Approved Document F – Means of Ventilation are for NO2, CO, Ozone (which are not related to emissions from construction products) and Total VOCs, which is 300microgram/m^3. ADF states that “at the present time it is not practical to make an allowance for the use of these [low emission] products in the ventilation requirements” (para 4.30).

[1] http://healthyhomesbuildings.org.uk/wpcontent/uploads/2017/08/APPG_HHB_paper-Reply-by-30-Sept-2017.pdf

[2] EnVIE. Co-ordination Action on Indoor Air Quality and Health Effects. 2009.

[3] https://www.citb.co.uk/documents/news%20and%20events/ventilationin-new-homes.pdf

User: Highgate Society

SI 1 Support

The principles of SI1 to ensure that new developments should not adversely affect air quality, either during construction, or for residents after they move in is supported. Additionally LETI requests the adoption of a kWh/m2 metric rather than a Part L comparison and requests the calculation of unregulated energy/CO2 as well as regulated.

LETI also makes suggestions about Borough SPGs and GLA assistance on compilation.

SI 1 A 4) Comment.

During the construction phase there should be monitoring and spot inspections of the air quality at each construction site – independent, but paid for by the developer, with power to halt work when infringements are discovered to prevent localised exposure.

SI 1 A 6) Comment.

No statements that air quality cannot be achieved should be accepted until an air quality professional, independent but paid for by the developers has reported

User:	London Borough of Ealing

Improving Air Quality
(SI1)

The Council supports this policy and measures to improve air quality.

Improving Air Quality
(SI1 A 5)

The need for an Air Quality Assessment should not solely be determined based on whether the proposal represents an improvement beyond the existing or previous use, as even with such improvements the development might still exceed certain standards.

User:	Natural England

Air pollutants such as NOx can have significant impacts on the ecological integrity of natural and semi-natural ecosystems through a number of pathways including eutrophication. However, the benefits of reducing air pollution on biodiversity are often overlooked. Therefore we **recommend** that reduction in harm to biodiversity and improving ecological integrity are also listed as additional benefits of reducing air pollution within Paragraph 9.1.1.

User: London Chamber of Commerce and Industry

Policy SI1 Improving air quality

87. ULEZ proposals must strike the right balance between delivering significant improvements to air quality whilst allowing businesses - particularly SMEs - to adapt to changes.

88. LCCI does not oppose the introduction of the ULEZ. However, haulage firms across London are faced with a difficult choice over the next three years. Plans to bring ULEZ forward a year earlier than planned, and proposals to expand ULEZ to HGVs entering the whole of Greater London in 2020 and vans within the North and South Circulars in 2021 will impact the livelihoods of SMEs across the capital.

89. Proposals for a ULEZ underline the need to balance public health concerns with the needs of London's businesses who deliver goods and people across the capital. We have previously called for a new Freight Commissioner to lead on policies such as ULEZ and plans such as the Mayor's Transport Strategy. In time, we believe stronger leadership in these areas will ultimately deliver a world-class transport ecosystem that supports a healthier, cleaner city.

90. LCCI does not oppose the principle of ULEZ. However, there are unanswered questions on impact and costs. The obvious challenges associated with upgrading vehicle fleets and unresolved questions over the upfront costs associated with expanding and implementing ULEZ must be resolved before LCCI is able to wholeheartedly support the scheme.

User:	Natural England

Certain types of green infrastructure have the capacity to mitigate air pollution, both by acting as direct physical barriers between sources and receptors of air pollution, and by actively removing pollutants from the air (e.g. street trees, hedges and green walls). We **recommend** additional text in paragraph 9.1.3 which supports the use of green infrastructure as a means of reducing and mitigating air pollution impacts.

User:	Chairs of Camden's Conservation Area Advisory Committees

We welcome effective and urgent measures to improve air quality.

User:	Natural England

In relation to the air pollution impact pathway, the draft HRA refers a number of times to mitigation measures in the as yet not adopted Mayor’s Transport Strategy (MTS). Currently the MTS constitutes only a list of potential options for reducing and mitigating air pollution, and there is therefore no certainty that these measures will be implemented. The precautionary principle embedded within the Habitats Regulations (2010) as amended requires that greater certainty is provided that adverse effects will be avoided. As such, we consider that greater clarity in needed regarding the availability of options to mitigate and reduce air pollution outlined in the MTS in relation to the timing of housing brought forward within the plan, which if unavailable at this time may have the capacity to lead to air pollution impacts. This detail should be included in a revised version of the HRA.

User: CIBSE

We support the overall intent to improve air quality. We would however note that the policy appears to be a significant downgrade in aspirations, compared to the draft Environment Strategy:

The proposed policy wording focuses on “improvements” and avoiding “further deterioration”, without clear and measurable objectives. Furthermore, the only threshold referred to is legal compliance; we would stress that UK legal air quality objectives do not entirely follow EU objectives and, more importantly, they are less onerous than recommendations from the World Health Organization (WHO) - the following table highlights key such occurrences. We would strongly support a policy that would align with the proposals in the Environment Strategy, i.e. air quality targets in line with WHO guidelines. This was also recommended by NICE in recent guidelines, at least within clean air zones19. Given the current state of air quality in London there is a real and urgent need for improvement in air quality and the Plan needs to set this out clearly and unambiguously.

[See table in Rep]

SI1-A-3 Demolition and Construction

We welcome the attention to this source of emissions. Non-road vehicles and equipment can significantly contribute to noise and air pollution in urban areas, and a switch to electric or hybrid models could therefore bring significant benefits; they are typically un-used at night, therefore being able to be charged at night during periods of lower demand. Electric construction vehicles, machinery and equipment should be more strongly encouraged, with the overall objective to eradicate diesel use. This is already the case on some construction sites, thanks to early discussions between developers, contractors and utilities to ensure a grid connection throughout construction. This would have significant benefits in reducing air pollution and noise exposure both for site workers and neighbouring populations.

Whilst it is anticipated that the latest changes to the EU Energy Performance of Buildings Directive will include requirements relating to electric vehicle charging, this will not extend to construction sites. The Mayor may wish to consider specific requirements whilst having regard to the potential constraints of delivering charging facilities on some sites with limited existing infrastructure (e.g. green field sites).

Best practice case studies could be gathered; we would point to the London Low Emission Construction Partnership (funded by the GLA)23 and the work of leading London boroughs such as the City of London as useful references.

SI1-A-3 Air Quality Positive and §9.1.9 Guidance

The draft Environment Strategy proposed to monitor the impact of measures to improve air quality; we would stress this is crucial if the policy objective of Air Quality Positive developments is going to be achieved – for example, to better understand the impact of green infrastructure or transport policies.

We welcome the Mayor's intent to provide more guidance – as for other policies, examples of best practice can be really useful, particularly when objectives may otherwise be seen to conflict with others (e.g. it would be particularly useful to show examples of co-benefits, where good design helps reduce exposure to air quality as well as noise and overheating risk, and examples of low-carbon and low-pollution heating strategies). CIBSE would be well-placed and happy to collaborate with the Mayor on this.

We would welcome a reference to the synergies with other policies, including G1 on green infrastructure, G5 on urban greening and G7 on trees, as these can offer benefits in air quality terms, as highlighted for example by a recent World Health Organization review on urban green spaces24 and the recent iTree assessment for London25. See also our response to Chapter 8 on the need for a whole-systems approach to green infrastructure.

SI1-A-5 Air Quality Assessments (AQA)

Air Quality Assessments often focus on assessing the impact on external air quality; their value could be improved if they were used to inform design proposals, with more attention given to mitigation measures for reducing exposure and reducing emissions, in collaboration with other disciplines. We therefore welcome §9.1.4 which encourages major developments to carry out preliminary AQAs.

AQAs should take account of the local urban form, including local wind patterns and massing, particularly in high rise areas. CFD modelling and methods such as those used in Singapore and Hong Kong to look at increasing airflow in urban canyons could be applied to help disperse pollution (these also being investigated in other cities such as Helsinki or Beijing). This is also linked to policies D1 – Design and D8 – Tall buildings.,

Furthermore, we would encourage AQAs to consider not only the impact on the surrounding ambient air quality, but also exposure of the future building occupants – see also comments further down on indoor air quality.

The current policy wording does not set in place any method by which to ensure compliance with the recommendations of the Air Quality Assessment. This should be addressed, including post-completion verification of measures such as emissions from major emission sources and verification of indoor air quality limits (see further comments on indoor air quality and post-completion below). What gets measured and verified against tangible, measurable targets is more likely to be delivered.

It is debatable whether size of development should determine whether an AQA is required. First of all, smallscale sources can result in a significant cumulative impact, as illustrated by the fact that, according to Defra, “domestic burning of house coal, smokeless solid fuels and wood is the single largest source of harmful particulate matter emissions in the UK, at around 40% of the total in 2015“26; the importance of wood burning on polluting emissions specifically in London and UK cities has also been shown by recent studies27. For smaller developments, we think the requirement for an AQA could also be triggered by risk factors such as average ambient pollution in the local area, or risk profile of the future building occupiers (e.g. housing, care homes, schools). A risk-based trigger would be more appropriate than a size-based trigger. Proximity to major roads or other sources of pollution such as local generators should be considered as material risks as a minimum.

A suggestion for major developments is that, instead of air quality being covered simply as part of the EIA, it should be addressed in an ‘Air Quality Strategy’ document, with similar profile and status as Energy Strategies. This should be a broader multi-disciplinary document with architect, Mechanical & Electrical engineer and Air Quality Specialist input, which would lead to significantly improved coordination between these key disciplines. It should contain at least the following information:

- Targets for air quality for the site, based on WHO limits and any site specific situations; these should include indoor air quality targets, and targets of polluting emissions.
- Strategy for meeting those targets, including specification of plant such as boilers, CHP etc, location of flues, opening requirements, filtration specification, provision of user guides, etc. Consideration should also be given to long-term ventilation plans so that, for example, if a development is currently proposed to be mechanically ventilated to allow high-level air inlets and filtration of the outdoor air, it may still have the capacity to be naturally ventilated in the future as London starts meetings its air quality objectives.
- Requirements for maintenance and operation to ensure that the system actually delivers what it is intended to (see below)
- Proposals for post construction monitoring (see below).

The key benefit of this document would be enabling councils and the GLA to produce guidance similar to energystrategy documents, and have a number of key metrics they could view to ensure compliance with policy. The on-site and off-site elements of air quality improvement would therefore be much more visible, and the requirement to meet the policy could be conditioned based on the air quality strategy document they present. CIBSE are well-placed and would be happy to collaborate with the GLA on this.

Post-completion

We recommend that post occupancy testing should be conducted on sample areas, particularly in uses such as residential developments and schools (e.g. 10% of apartments in a residential development, as for acoustics testing, or a percentage of floorplate in commercial buildings), with heating plant in full operation to ensure emissions from plant meet the required standards and indoor air quality standards meet recommended limits (i.e. WHO guidelines).

Operation & Maintenance manuals and building user guides should include a section on air quality to ensure occupants are aware of any systems in place to protect them from poor outdoor air, and the proper maintenance of those systems (e.g. filter class, replacement periods, etc.)

§9.1.6 Generators

We agree that AQAs should include consideration of emergency generators, as their impacts on local air quality were highlighted by DEFRA in December: “domestic energy market incentives are leading to an increase in high NOx (oxides of nitrogen) emission generators, which (…) have the potential to exceed the Gothenburg 2020 NOx emission ceiling and hourly NO2 (nitrogen dioxide) limits set in the EU Ambient Air Quality Directive“.

Beyond air quality issues, they are also a high-carbon way to generate electricity, and their operation therefore also potentially jeopardises carbon emissions reduction targets.

New regulation is coming into force to implement the Medium Combustion Plant Directive28, which will place further restrictions on generators including a maximum limit of 50 annual hours of operation for plant to be classified as back-up plant – the same limit (or lower) should be followed in London, and it should be incorporated in planning conditions and monitored. Limits to operating hours can be difficult to enforce and monitoring compliance is crucial, as highlighted by the Institute for Air Quality Management29, so this should be given appropriate resources and be carried out in liaison with Defra’s permitting department.

It should also be noted that, in the first few years, the new regulatory restrictions will only apply to new plant and an assessment by Defra has concluded that transposing the MCP alone would “not adequately address the risks these generators pose to air quality and to our compliance” with NOx level objectives, and therefore that “additional regulation is needed and quick action required to avoid further rapid increases in NOx emissions from generators.” Defra therefore recommend the introduction of additional emission controls to address the growth in emissions from high-NOx emitting generators30. We therefore recommend that the Mayor of London should consider additional measures, including how to treat existing generator plant to improve emissions and/or limit operating hours. Emission control options, including technological abatement, have been assessed by Defra30.

SI1-A-6 and §9.1.9 Off-site measures and offset payments

We appreciate that in some cases, project constraints will limit the extent of possible on-site measures, and off- site measures and/or offset payments may be the most appropriate route to deliver overall improvements and to target other areas which are not subject to development. We would however note the following, based on experience in carbon offsets:

- Offsetting strategies often over-estimate future potential benefits, compared to the actual delivered benefits which in practice rely on good design, implementation, and management. This is the case for carbon offsets and we would encourage similar caution in the case of air quality proposals: for example, urban tree planting often has low success rates, caution should be applied if assuming that a “potential future tree” will deliver improvements in pollutant concentrations. Furthermore, a number of measures are known qualitatively to offer benefits, but their quantification is still subject to evolving knowledge – this is the case for example for a number of green infrastructure measures, or urban design approaches to pollutant dispersion. We would recommend that off-site measures be limited to known, established measures in the first few years, while knowledge on other potential measures improves (see also our previous point in this section on the importance of monitoring the impact of measures put in place, in order to gather lessons on what works).
- Carbon offsetting strategies can be costly and time-consuming to manage, and it is now recognised that London boroughs would benefit from guidance to deliver carbon savings in practice. This lesson should be taken into account if air quality offsetting is proposed.
- Air quality emissions are a much more localized problem than carbon emissions, and where improvements are carried out is therefore much more important. Applying off-site measures should take this into account to ensure that air quality is improved in areas where it is most needed.

Indoor air quality

While the policy mentions reducing exposure, it seems very focused on external air quality. We would welcome clearer guidance on objectives for indoor air quality, given that current regulations, including Building Regulations, do not provide a comprehensive framework to address this, and given the time it will take to achieve objectives for external air quality. For this purpose we would recommend, as for outdoor air quality objectives, referring to WHO guidelines.

If air filtration is used in the development to comply with indoor air quality standards, there should be preoccupancy testing to confirm suitable operation, and information must be provided to the future occupiers on the type of air filtration used, its location and how to operate and maintain it. If filtration is used, applicants should confirm that it has been taken into account in energy and carbon calculations (policy SI2) - this is often not the case, particularly in the case of SAP calculations where fan efficiencies in Mechanical Ventilation with Heat Recovery very often do not take account of filters.

See also responses to policy SI3 and to the Transport chapter; we would also like to refer to our response to the London Environment Strategy, November 2017.

Overall comment

CIBSE provide a number of guidance documents on this issue, including TM21 on the location of air intakes and the upcoming revised Technical Memorandum 40 on Health & Wellbeing; we would welcome reference to CIBSE in the supporting guidance, and would be happy to collaborate with the Mayor’s team to ensure the Mayor’s guidance reflects best professional practice.

User:	DPDgroup UK Ltd

Policy SI1 – Air Quality

DPD are fully committed to the introduction of electric and environmentally alternative fuel vehicles. The viability of these has two considerations; infrastructure covered in section 3.9 and the location of final mile delivery depots.

Technology is not developed to a point where long stem mileage is feasible and the reoccurring theme of protection of B8 space applies particularly to achieving this goal. Our testing shows that long distance, higher speed driving drains the vehicle battery quickly and therefore long distance range is very limited. The vehicles, combined with regenerative charge are designed for city centres and not for accessing these areas from long range.

User:	Sustrans
Sustrans strongly supports policies to reduce air pollution and improve air quality, with a focus on reducing the exposure of vulnerable people.	

User:	Sustrans
For large-scale developments, we welcome the aim to be Air Quality Positive and consider that this should be a requirement of Opportunity Areas to help reach legal limits as soon as possible, as identified in the Mayor’s Transport Strategy.	

User:	Hornsey & Wood Green Labour Party

We support the principles of SI1 to ensure that new developments should not adversely affect air quality, either during construction, or for residents after they move in.

Additionally at A 4) During the construction phase there should be monitoring and spot inspections of the air quality at each construction site – independent, but paid for by the developer, with power to halt work when infringements are discovered to prevent localised exposure. And at 6) no statements that air quality cannot be achieved should be accepted until an air quality professional, independent but paid for by the developers has reported.

User:	ENGIE

ENGIE welcomes this opportunity to respond to the Mayor’s draft London Plan consultation. In particular we welcome the following:

- The Mayor’s ambition to improve London’s air quality. We believe that this will help deliver better health outcomes for Londoners.

User: Mr Sydney Charles

We support the principles of SI1 to ensure that new developments should not adversely affect air quality, either during construction, or for residents after they move in.

Additionally at A 4) During the construction phase there should be monitoring and spot inspections of the air quality at each construction site – independent, but paid for by the developer, with power to halt work when infringements are discovered to prevent localised exposure. And at 6) no statements that air quality cannot be achieved should be accepted until an air quality professional, independent but paid for by the developers has reported.

User:	Landsec

SI1 Improving Air Quality: We support the principle of this policy and recognise the need to improve air quality in London. However, we require further clarification as to how ‘Air Quality Positive’ would be achieved. In addition, we recommend that clearer guidance is offered to developers on possible solutions to meet the energy efficiency targets stated in Policy SI2 given CHP is currently the preferred route for most schemes as it delivers cleaner than grid electricity and low carbon heat but does potentially impact on local air quality.

User: ADE - Association for Decentralised Energy

Ensuring appropriate baselines: focussing on real-world impacts

The ADE supports the Mayor's ambitious proposed air quality requirements. These requirements are designed to ensure that, using modelling, the local air quality impacts are neutral or positive.

Unlike minimum technology or emission requirements applied at the source, the requirement for air quality neutrality (or positivity, where relevant) is the benchmark that London's new buildings should be held to, as it is the one which most directly measures real world impacts.

Past air quality regulations have focused more heavily on outputs than outcomes. The dispersal of emissions from a CHP can result in improved street-level NOx emissions. The recognition of CHP's air quality benefits requires an accurate and appropriate measurement of NOx produced from CHP plants. It is not effective policy to compare NOx emitted in a dispersed and high level manner from CHP with that from low-level traffic or non-dispersed boiler emissions. In many cases, CHP with well-designed high level dispersion can lead to lower local NOx concentrations than ground level boilers. Future policy needs to account for this dispersion to enable CHP to compete on an even playing field.

Proposals for CHP compared to an ultra-low NOx boiler should allow for dispersal modelling of NOx to ensure the comparison is based on the impact on local residents at street level, in line with the aims of the London Plan.

The Association recommends, therefore, that the GLA set out clearly in Energy Planning Guidance (and any other related guidance documents) that new developments must show their projects are air quality neutral against the counterfactual of ultra-low NOx boilers as determined by air quality modelling, not point source emissions.

User:	Cllr Richard Chatterjee

9.1.2 The aim of this policy is to ensure that new developments are designed and built, as far as is possible, to improve local air quality and reduce the extent to which the public are exposed to poor air quality. This means that new developments, as a minimum, must not cause new exceedances of legal air quality standards, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits [116]. Where limit values are already met, or are predicted to be met at the time of completion, new developments must endeavour to maintain the best ambient air quality compatible with sustainable development principles.

[116] Air Quality Standards Regulations 2010, or subsequent revisions thereof.

User: Cllr Richard Chatterjee

9.1.8 Air Quality Focus Areas (AQFA) are locations that not only exceed the EU annual mean limit value for nitrogen dioxide (NO2) but are also locations with high human exposure. AQFAs are not the only areas with poor air quality but they have been defined to identify areas where currently planned measures to reduce air pollution may not fully resolve poor air quality issues. There are currently 187 AQFAs across London. The list of Air Quality Focus Areas is updated from time to time as the London Atmospheric Inventory is reviewed and the latest list in the London Datastore should always be checked.

Comment:

Air quality monitoring should be performed regularly at residential locations affected by the South London Waste Plan (SLWP) Beddington Lane Incinerator, which discharges into the local atmosphere, to ensure air quality does not breach the limits stated in the air quality standards.

Recommendation:

If air quality is found NOT to meet the air quality standards, the local incineration of waste should NOT continue to be performed until the air quality improves to acceptable standards. Procedures for shutting down the Beddington Lane Incinerator should be specified.

User: Redrow Homes London Division.

We agree that poor air quality is a major issue for London which is failing to meet requirements under legislation. We therefore support the Mayor's dedication to improving air quality for Londoners and recognise the need for development proposals to use solutions to prevent or minimise increased exposure. A careful balance of priorities however needs to be struck. Seeking Air Quality Neutral (or even positive) has an impact of achieving zero carbon. Solutions often add to energy consumption.
The supporting text to Policy SI1 also suggests the introduction of offsetting payments (similar to zero carbon payments).

The policy wording as currently drafted is confusing. It calls for large-scale development areas to propose methods of achieving an Air Quality Positive outcome and states that all other developments should be at least Air Quality Neutral. Large-scale is not defined. This must be addressed.

This policy should also provide a clearer distinction between the construction phase of development proposals and the end state of the finished product.
As per zero carbon, the costs of any offsetting payments will have to be taken into account by the decision-maker when assessing scheme viability. This may have implications for the delivery of other objectives, including affordable housing.
Furthermore, this policy should include a requirement for Boroughs stating how, where and when they will spend the payments.

User: London City Airport

This policy requires the development of large-scale redevelopment areas, such as Opportunity Areas and those subject to an Environmental Impact Assessment, to propose methods of achieving an Air Quality Positive approach through the new development. All other developments should be at least Air Quality Neutral. The Airport is wholly supportive of the principle and the need to improve London's air quality, but awaits the Mayor's guidance on the most effective approach to be taken to ensure that development is Air Quality Positive (as set out in Proposal 4.3.3a of the draft London Environment Strategy). Until such guidance is available the Airport objects to the present drafting of Policy SI1 and is keen to work with the Mayor's advisors to improve the clarity and intention of the policy.

This policy also requires that for major developments, a preliminary Air Quality Assessment (AQA) should be carried out to inform the design process. The Airport fully supports this approach, and air quality considerations were fully taken into account throughout the CADP1 planning process.

A programme of ambient air quality monitoring began at the Airport in 2006. There have been no recorded exceedances of the nitrogen dioxide or PM10 objectives at the automatic monitoring sites since monitoring commenced. The Airport has an up to date Air Quality Action Plan which focuses on minimising emissions of nitrogen oxides (NOx) from Airport operations, as this is the pollutant of greatest concern in the local area. Results from the Airport's Air Quality Measurement Programme have demonstrated that concentrations of PM10 have been well below the UK Government objectives at the Airport since monitoring. In addition London City Airport was awarded an ISO14001 accreditation which certified its environmental management system as a Stage 3: Optimisation Certificate by the Airport Carbon Accreditation. The only level higher than this is Carbon Neutral which the Airport aims to achieve by the end of 2020.

User: eCountability Ltd

Policy SI1 Improving air quality

We support this policy, as it is completely unacceptable for poor air quality to cause thousands of premature deaths in London each year, and good planning is an important part of the solution.

We recommend that the wording of clause A3 is strengthened, so that Developments are required to demonstrate net positive impact on air quality, not merely to propose methods. The role of the creation of new greenspace and improvements to quality of existing greenspace from the air quality perspective should be mentioned.

User:	Cross River Partnership

There is undoubtedly a need for practical measures across the CAZ and the city as a whole to reduce air pollution triggered by intensive land-use, a congested road network and construction.

CRP has a great deal of experience of designing and delivering these interventions in partnership with Borough and BID partners e.g. www.clickcollect.london; www.deliverBEST.london; www.maryleboneLEN.org; www.cleanairroutes.london; www.frevue.eu

User:	Lendlease
We support the overarching principle of this policy which seeks to improve London’s air quality, however, further clarification is needed on how ‘air quality positive’ would be demonstrated/quantified.	

User:	Oneill Homer
SI1 Where AQFAs coincide with neighbourhood plan areas, the plan can identify bespoke local measures to improve air quality through land use and development decisions.	

User:	Public Health England

Air quality

? Policy SI1 is welcomed to improve air quality which can, in turn, protect human health and minimise inequalities. Long term air pollution exposure is detrimental to cardiovascular and respiratory health. In London, the air pollution encountered has been suggested to cut short 9,416 lives a yearxix. Older people, children and those with pre-existing illness are more vulnerable to the adverse health effects of air pollution.

User:	London Stansted Cambridge Consortium

Improving Air Quality (SI1)

LSCC appreciate the need to improve air quality in London and the classification of Air Quality Focus Areas along the corridor are important to addressing this. LSCC raises considerations of how improving air quality might impact on the freight, logistics and distribution sector in the corridor and whether this is possible along strategic transport routes such as the A10, M25 and M11. LSCC are keen to work with GLA partners to work towards a joint solution that contributes to the continued improvement to air quality. in London and the wider South East

User: Unknown

Our client acknowledges the significant role that the built environment will play in minimising and mitigating the impacts of development on air quality. This is of course alongside the significant mitigation that will be required within the transport sector. To this end, the increased focus on addressing and reducing London's air quality issues through a general requirement would be reasonable. Policy SI1 makes reference to a requirement for large-scale development areas and developments subject to Environmental Impact Assessments to propose methods of achieving an Air Quality Positive approach. This target will likely prove impossible. With a commitment to optimising densities within areas such as transport hubs, the likely impacts of external air quality on internal readings may increase and proximity of new development to sources of pollution will narrow respectively. Furthermore, the increased density of development in certain areas and requirements for complex engineering solutions may limit the scope to include measures that positively impact air quality. Strategically this policy will be extremely difficult to achieve and is another element of policy emerging from the plan that will likely reduce the viability and deliverability of development in London.

In addition, our client would express some concern over the viability analysis conducted in relation to Policy SI1. The London Plan Viability Study Technical Report (Dec 2017) states that the associated costs have been tested; however, no evidence is available for these costs. They suggest that additional analysis is conducted across the strengthening of policies relating to the provision of Sustainable Infrastructure.

User: Wimbledon East Hillside Residents' Association

The air quality proposals are white-wash; you must make clean air a number one priority, not just list some ideas you think might make things a bit better 'in the future.' (For example, Merton is trying to force thru planning right now a new Concrete Batching plant from Cappagh/Express Concrete that is located in a pollution Hot Spot, with an HGV on the road every minute of the working day, tearing up roads, belching pollution and driving at just over 30 mph, endangering pedestrians and showing no regard for the local residential population. The site is just six metres from the Wandle River, and metres from a primary school. Merton is looking for loopholes to allow this application to be approved, when they should be doing the right thing, be HONEST about the environmental issues of air pollution, noise, light pollution and water pollution and disregard for and of degradation of the Wandle River Valley - a site specifically identified to become regenerated as a wonderful green corridor (to mirror the Lea Valley plans now underway).

Your new plan should be giving firm guidelines and high penalties, unless this sort of greedy application is REFUSED. The new plan should not just itemise a bunch of guidelines that councils can use to dodge these incredibly serious environmental issues.

User: L&Q

Air quality

We agree that poor air quality is a major issue for London which is failing to meet requirements under legislation. We therefore support the Mayor’s dedication to improving air quality for Londoners and recognise the need for development proposals to use solutions to prevent or minimise increased exposure. A careful balance of priorities however needs to be struck. Seeking Air Quality Neutral (or even positive) has an impact of achieving zero carbon. Solutions often add to energy consumption. The supporting text to Policy SI1 also suggests the introduction of offsetting payments (similar to zero carbon payments).

The policy wording as currently drafted is confusing. It calls for large-scale development areas to propose methods of achieving an Air Quality Positive outcome and states that all other developments should be at least Air Quality Neutral. Large-scale is not defined. This must be addressed. This policy should also provide a clearer distinction between the construction phase of development proposals and the end state of the finished product. As per zero carbon, the costs of any offsetting payments will have to be taken into account by the decision-maker when assessing scheme viability. This may have implications for the delivery of other objectives, including affordable housing. Furthermore, this policy should include a requirement for Boroughs stating how, where and when they will spend the payments.

User: Clean Air in London

CAL supports the NLP in as far as it goes.

However, CAL considers that the severity of the air pollution problems in the London, including breaches of air quality limit values and high energy use, combined with its iconic status, show the need and opportunity for London to take a more ambitious path to: comply fully with air quality limit values as soon as possible; achieve the relevant United Nations' Sustainable Development Goals (SDGs); and achieve Science Based Targets for reductions in carbon emissions. London should be an 'exemplar'.

Of particular concern, CAL urges you to take immediate steps to ensure that energy policy does not undermine the significant and continuing air quality improvements that are being achieved by your action to reduce harmful exhaust emissions from transport. CAL is extremely concerned about emissions from gas engine combined heat and power units (never mind those that burn biomass or other fossil fuels). You need to review and amend urgently *inter alia* the heat/energy hierarchy to address this problem. New policies and measures to control energy emissions must apply Londonwide, not only in areas exceeding legal limits, because these CHP units can cause sharp increases in nitrogen dioxide (NO^2) concentrations e.g. as has reportedly happened around St Bartholomew's Hospital in the City of London.

Draft New London Plan

CAL is pleased to see that the NLP aligns key aspects of its air quality policies (Policy SI1 Improving air quality) to the requirements in Directive 2008/50/EC on ambient air quality and cleaner air for Europe. This approach is consistent with advice from Robert McCracken QC to CAL dated 6 October 2015 (attached).

https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/draft-newlondon-plan/chapter-9-sustainable-infrastructure/policy-si1-improving-air-quality

https://cleanair.london/app/uploads/CAL-322-Robert-McCracken-QC-opinion-for-CAL_Air-

Quality-Directive-and-Planning_Signed-061015.pdf

CAL considers that the NLP can and should aim at achieving relevant SDGs and other ‘outcomes’ without imposing unrealistic requirements on all development immediately. Also that the NLP offers an opportunity or path for London to take charge of its own destiny e.g. by not relying, as the Mayor is doing on government action to decarbonise the national energy network. Please see:

MQT 2018/0377 dated 22 February 2018

London Plan and carbon reduction targets (2)

User: UK Power Networks

You have outlined key plans in the Transport Strategy and the London Plan in setting out the key challenges and areas of focus for transport and electric vehicle use in London. We provided a response to the Transport Strategy consultation dated 2 October 2017, please refer to this response for our position on supporting the transition in London's transport plans. Additionally, UK Power Networks has already been involved in several discussions with the GLA on the transition of transport modes in London and we welcome further collaboration towards the effective delivery of commitments in these plans.

We are playing a leading role in encouraging the shift to low carbon transport – since 1990 the power sector has made a 49% reduction in greenhouse gas emissions, which provides a stark contrast to that of the 2% reduction observed in the transport sector. It is clear that the transport sector will see significant changes in the coming years, for example, as stated earlier, by 2030, we forecast between 1.2 and 1.9 million additional electric vehicles (EVs) will be connected to our electricity networks alone. As such, we are committed and enthusiastic about our role in facilitating the uptake of EVs and plan to do so by advancing innovation wherever possible and we believe that up to 40% of the additional power required can be supplied by using smart solutions.

We have significant experience enabling the uptake of EVs, and can provide unique insights into the impact of changes occurring in the transport system. While the UK has begun transitioning to a low carbon economy, the last six years has involved the connection of over 4000 EV charge points, placing additional load on our networks. This comprises of both charge points installed at customer properties and directly to our network such as on-street charge points. We have been actively exploring the impacts of EV charging demand on our networks as well as the opportunities for intelligent management of demand from the existing network capacity.

To illustrate how we have been actively supporting customers who are promoting and leading the electrification of the transport sector, we are proud to have facilitated Europe's first fully electric bus garage at Waterloo, with both Camberwell and Northumberland Park bus garages also gaining similar connections in recent months. We are also collaborating on the Black Cab Green project with TfL and London Electric Vehicle Company to facilitate their desires to decarbonise and to better understand and mitigate network impacts of taxis and private hire vehicles as they become zero emission capable.

User: dp9

Policy SI1 – Improving air quality

The Draft London Plan does not contain a definition of Air Quality Positive, and this should be provided so that developers can understand what this policy requires.

RECOMMENDATION: Add a definition of Air Quality Positive to the glossary.

User: UK Power Networks

You have outlined key plans in the Transport Strategy and the London Plan in setting out the key challenges and areas of focus for transport and electric vehicle use in London. We provided a response to the Transport Strategy consultation dated 2 October 2017, please refer to this response for our position on supporting the transition in London's transport plans. Additionally, UK Power Networks has already been involved in several discussions with the GLA on the transition of transport modes in London and we welcome further collaboration towards the effective delivery of commitments in these plans.

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We have significant experience enabling the uptake of EVs15, and can provide unique insights into the impact of changes occurring in the transport system. While the UK has begun transitioning to a low carbon economy, the last six years has involved the connection of over 4000 EV charge points, placing additional load on our networks. This comprises of both charge points installed at customer properties and directly to our network such as on-street charge points. We have been actively exploring the impacts of EV charging demand on our networks as well as the opportunities for intelligent management of demand from the existing network capacity.

To illustrate how we have been actively supporting customers who are promoting and leading the electrification of the transport sector, we are proud to have facilitated Europe's first fully electric bus garage at Waterloo16, with both Camberwell and Northumberland Park bus garages also gaining similar connections in recent months. We are also collaborating on the Black Cab Green project with TfL and London Electric Vehicle Company to facilitate their desires to decarbonise and to better understand and mitigate network impacts of taxis and private hire vehicles as they become zero emission capable.

User: UK Power Networks

Our response to your Transport Strategy provides additional detail to our views on the decarbonisation of transport, but some of the key considerations that will help facilitate the transition to increased EV use are highlighted below:

? Early engagement: We encourage early engagement from the GLA, TfL, local authorities, fleet operators and customers with significant EV charging requirements. They should give careful consideration to the power supply and network infrastructure requirements early in their plans and we are committed to support them through this process.

? Visibility and notification: Visibility and notification of EV charge point installations enables more efficient planning and management of our networks, this is most crucial to low voltage networks where monitoring is less extensive. Electricity network operators have established an EV charge point installation notification process17 with the Electricity Networks Association (ENA) that currently captures data on the location and rating of charge points. This is largely a voluntary process and would be further improved by policy changes encouraging compulsory notification to the DNO. We consider the following as the minimum data fields that should be included in any future standardised format of data collection:
o Static data – location of charge point, number of sockets, rated power (kW) per socket, mode of charge (AC/DC), smart functionality e.g. stop charge, vary charge rate; and
o Dynamic data – charge rate and charging status.

? Standards: Standards are particularly important to ensure that customers have safe and secure smart functionality designed into a charging system that is also open, interoperable and scalable. Standards should be designed to allow consistent interaction and information exchange between the smart charge point and electricity network management systems as well as protection from cyber-attacks.

Building on existing initiatives, we believe the following steps would further help the adoption of EV’s and we welcome the opportunity to work together in supporting you advancing the following activities:

? Infrastructure stakeholder collaboration: Facilitating forum with key infrastructure stakeholders to ensure standardisation and interoperability of charge points.
? Communications: Publicising existing initiatives and alleviating concerns for drivers and fleet operators looking to electrify is a key element in advancing growth.
? Guidance: Providing more support and guidance18 to industry stakeholders including local authorities in the installation of public and private charge points.
? Smart Charging: Promoting measures being outlined as part of the Electric and Autonomous Vehicle bill, in particular requirement for Smart Charging. Smart Charging infrastructure will be important in enabling customers to charge their vehicles, by maximising the utilisation of existing network capacity and minimising the requirements and costs of reinforcing the electricity network.

User: UK Power Networks

Reducing our Business Carbon Footprint

In our RIIO-ED1 Business Plan we set a target to reduce our business carbon footprint (BCF) by an additional 2% in each year of the RIIO-ED1 price control period (2015-2023) against our baseline year (set by Ofgem) of 2014/15. To check progress against our RIIO-ED1 target we prepare monthly BCF reports and any anomalies in the data are closely examined to establish the root cause. Corrective and preventative actions are then implemented where necessary. We are pleased to report that in 2016/17, our latest full year's report, we showed a reduction of almost 11%, significantly ahead of target.

Additional detail on our BCF reductions since 2014/15 are mentioned below:

? Operational Transport: At 38%, operational transport is the largest element of our BCF, representing the fuel used by our fleet of vans, trucks and specialist vehicles which work directly on our electricity networks. Additionally, we also report on the fuel used by our contractors' operational vehicles when working on our behalf. A major upgrade of our fleet has taken place in recent years replacing many older vehicles with safer, more reliable fuel-efficient models. Our contractor emissions have also reduced as functions like tree trimming have been brought in-house. Furthermore, we are conducting trials on EVs to ascertain which vehicle job roles can be replaced by EVs. As a result of the above measures, overall our BCF for operational transport has reduced by 16%.

? Building and Substation Energy Use: This represents 36% of our BCF. Carbon savings of 10% have been achieved as a result of the consolidation of staff into fewer building and simple energy saving initiatives such as the introduction of LED lighting in many offices.

? Business Transport: We encourage all staff to travel by rail when practical and promote the use of tele-conferencing facilities to limit unnecessary travel. Overall business transport makes up 6% of our BCF and to date, this has been reduced by 8% by the aforementioned measures.

User:	Pinkham Way Alliance

NB Waste Policy S18 is inconsistent with Policies E6, SK1, E4, and E7 insofar as it refers to Locally Significant Employment Sites/Land. This is the only reference to LSES/L and it is not referred to in the narrative. It should be amended to Locally Significant Industrial Sites which would be consistent with the explanatory narrative throughout the rest of policies and narrative in the Plan and it would remove the confusion about whether designated ‘Employment sites’ were suitable for waste uses

User: Taylor Wimpey UK

Policy SI1 Improving Air Quality

We support the ambition for improved air quality in London but have concerns that sufficient and appropriate technical guidance and process needs to be in place for objective decision making. Without an objective framework for concepts such as 'Air Quality Neutral', 'Air Quality Positive' or 'Air Quality Offsetting' there is a risk of subjectivity, disagreements and delays.

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User:	Kingston First

It is important that new development and transport infrastructure is delivered without harm to the environment, during both the construction and operational phases of development. Kingston First supports the draft Policy SI1 and continued efforts to improve air quality within the capital.

User:	London Borough of Enfield

More practical detailed measures on how air quality can be improved and how greenhouse gas emissions can be reduced would be useful, especially due to the shortage of BREEAM assessors.

User: Kew Society

Policy SI1 Improving air quality

This policy should be strengthened in A 1 to require any developments (including Heathrow expansion) to demonstrate how they will improve air quality rather than simply not make matters worse. This is picked up in A. 3, which we assume would apply to Heathrow, but could be made stronger by turning A.1 into a positive requirement.

Policy Sl1, A5, requires all major developments to submit an Air Quality Assessment (AQA) “unless they can demonstrate that transport and building emissions will be less than the previous or existing use”. We propose that the latter clause is removed. *All* developments should have to provide a standard level of assessment, i.e. an AQA. The inclusion of this clause will only tempt developers to try to avoid compliance with air quality standards.

Paragraph 9.1.9 refers to making a development which is non-compliant with AQ neutral standards acceptable through additional mitigation or offsetting payments. We are strongly opposed to this loophole for non-compliant developments. It is incompatible with the principles laid down in Policy Sl1. Developments must not be allowed under any circumstances to lead to further deterioration of existing poor air quality or create new areas that exceed air quality – for the sake of the health of vulnerable people – as expressed in that policy. If developments cannot demonstrate compliance, they should not be permitted.

User: London Borough of Camden

Given the evidence of impact on poor air quality on health, the Council welcomes the provisions within the Policy which seek to improve air quality beyond that of the adopted London Plan, particularly regarding the aim for Opportunity Areas and EIA developments to be air quality positive. We note however that the policy is less prescriptive than Policy 7.14 of the current London Plan, presumably the intention of which is to enable innovation with regards to delivering ‘design solutions’ to meet the increased targets.

Camden considers that further policy support from the Mayor regarding how air quality targets could be met would be helpful. We therefore welcome para 9.1.11 which includes a commitment by the Mayor to publish guidance regarding how air quality positive and neutral standards could be met. The guidance should include details of permanent features of the building that could be acceptable and details regarding offset payments (referred to in para 9.1.9).

User:	London Borough of Camden

The Plan should recognise that there is no medically recognised “safe limit” for levels of airborne particulate matter. Rather than developments being expected to "endeavour to maintain the best ambient air quality” we would welcome additional NO2 and PM targets where legally feasible. This could provide a second tier of standards for developments, as air quality levels improve.

User:	London Borough of Camden

Camden generally requires a detailed AQA to be submitted with a major planning application and minor applications in existing critical AQ areas or having critical AQ impacts. A two-stage process should not be introduced at the expense of diluting the initial information requirements at the planning application stage, when councils have most ability to influence development schemes.

User:	London Borough of Camden

This approach set out in para 9.1.3 is welcomed. Developments with above-average emissions (either absolute or relative to floor area/dwellings) should also be considered for inclusion as schemes that should aim to be air quality positive.

The minimum air quality positive requirement should be quantified, e.g. x% improvement against emission benchmarks. An air quality positive offset fund could then be established to help deliver measures in lieu of developers' own offsite measures. However, the price would need to be set at a suitable level to encourage developers to deliver measures themselves in the first instance.

User:	London Borough of Camden

A revised AQA is often necessary in light of post-consent changes at detailed design. We welcome the default two-stage process so long as the second assessment does not reduce the detail and weight placed on the first.

User:	London Borough of Camden

We welcome standby generators being included in assessments. Existing generators should be included for proposals involving new construction or refurbishment. Assessment should also apply to any sites which include Short-Term Operating Reserve (STOR) generating equipment.

User:	Alex Page
With 10,000 Londoners dying prematurely every year from air pollution, I support the London Plan policy to improve air quality (SI1).	

User:	London Borough of Camden
Camden favours use of LAEI data in AQ Assessments over the lower resolution Defra national data and suggest the Mayor backs this approach.	

User:	London Borough of Camden

It is not clear whether there is to be different treatment of proposals in air quality focus areas and, if so, what this would be.

User:	London Borough of Camden

In our experience, schemes failing to reach AQ Neutral standards has not been a widely encountered issue. We would not support the introduction of offsetting payments to reach Air Quality Neutral, since (unlike e.g. carbon offsets) the excess air pollution would affect human receptors in the locality of each specific development. Offsetting procedures would by definition risk failing to mitigate the development's specific health impacts.

User:	London Borough of Camden

See our comments to para 9.1.2 above.

The Plan should recognise that there is no medically recognised “safe limit” for levels of airborne particulate matter. Rather than developments being expected to "endeavour to maintain the best ambient air quality” we would welcome additional NO2 and PM targets where legally feasible. This could provide a second tier of standards for developments, as air quality levels improve.

User:	London Borough of Camden

We welcome the intention to publish further guidance on Air Quality Neutral and Air Quality Positive standards as well as guidance on how to reduce construction and demolition impacts.

User:	Battersea Project Land Company Limited

Policy SI1 – Improving air quality

The Draft London Plan does not contain a definition of Air Quality Positive, and this should be provided so that developers can understand what this policy requires.

RECOMMENDATION: Add a definition of Air Quality Positive to the glossary.

User:	Gideon Corby

With 10,000 Londoners dying prematurely every year from air pollution, I support the London Plan policy to improve air quality (SI1). I support the proposed banning of all wood and smokeless fuel burning for domestic stoves. Living by the Regents Canal means that at present wood and coal is freely burnt without any consideration for those breathing in this pollution.

User: Siemens

2.2 Improving Air Quality

The Air Quality section identifies and appropriately addresses one of the largest environmental challenges London faces; it is clear the GLA takes this crisis seriously. We advise that given the ambition of the reaching the EU and the WHO targets, the city begins to look for mechanisms so that they can respond actively to air pollution spikes. Improved air quality forecasting can aid in efforts to help Londoners reduce their exposure to high levels of PM and NOx but also acting on this information is key. A mobile sensing, monitoring and modelling system can help to identify opportunities for new policies and actions to tackle air pollution.

User:	Federation of Enfield Residents & Allied Associations

1. **Pollution**: is a substantial but localised problem in this suburb, mainly confined to arterial road corridors, and must be tackled locally. We think it possible to safeguard the air around sensitive installations - schools, hospitals etc; we urge the GLA to identify and force change around these sites, provide protection or move them elsewhere, using all approaches including street closure. Public support for strong immediate measures is guaranteed.

User: Karl Brown

9.1.2 References new developments being designed and built with an intent to improve air quality. This is supported but is also one of many references throughout the plan, particularly in the early sections, where the focus on such good intent is limited to new developments. In the generality, I would wish to see the plan referencing all such worthy ambitions / requirements as the intent at all times and in all areas of London, ie “All stakeholders should bear in mind at all times and strive in all circumstances to work towards the requirements set for new developments, even when no new development is planned.” Or similar. We would all like the best local London wherever we live and work within it.

The Mayors own introduction talks of, “the London Plan revolutionising the way we get around our city - enabling a boom in active travel, with walking and cycling becoming the primary, default choice for millions of Londoners because we have made it far easier and safer.” Despite being a relatively compact central zone, and hence eminently walkable, it is far from straightforward to identify where in the plan the Mayor outlines the intent to switch substantive road space from the acknowledge current dominance of cars to space allocated to facilitate fast, attractive and safe, dedicated walking routes. Make it possible that walking from Kings Cross / Victoria / Waterloo to Holborn / Oxford Street / The City and such is a natural first choice.

User:	Karl Brown

Section 9. I could see no reference to wood burning stoves or the personal / small business use of potentially high polluting tools such as angle grinders.

User:	Karl Brown

9.1.10 Rather than ruling out the “banking” of air quality improvements to potentially permit new, dirtier developments, it would be appropriate if a ratcheting down policy was in place such that any improvements became permanent via the repeated setting of a new, lower bar.

User: Ursula Riniker

You and your team have a big task drafting the new London Plan, and I like many of your proposals, but I want to draw attention to a particular concern of mine. London's air is so polluted that it is hardly worth breathing, and yet we all have to breathe. Among other measures, we need a radically different approach to new developments, and we need to make them "zero carbon", by using the most efficient type of PV panels and ground source heat pumps etc. We can no longer afford the unnecessarily polluting developments of the past which damage the environment. I understand that there is currently a submitted planning application in Dagenham, by the Japanese company NTT Communications, for two buildings, each 212 meters long, on brownfield land, with nearly 4,000 rooftop solar panels for generating power. This is clearly the way forward. There are already some companies that build "zero carbon" houses. If you go to the website www.vertohomes.com you can look at this very you!ng company's beautiful "zero carbon" homes. The company is still small, but unlike the dinosaurs among the housebuilders, they have grasped the fact that environmentally damaging developments are no longer acceptable and zero carbon must be the future. On that same website, click on "Sustainability", look at "Energy Generation" about powering homes without burning fossil fuels and about the use of powerful photovoltaic panels integrated into the roof. Click on "Renewable Heat" and "Thermal Efficiency" for further info.

Please take whatever measures are within your powers to improve London's air.

User: London Assembly Green Party Group

These policies are an improvement in many ways on the current London Plan, particularly as the air pollution plans here seek to be more effective than those of the previous Mayor. However, even these policies do not have enough ambition, and our amendments to this chapter will make sure we stick to our legal obligations to give everyone clean air to breathe in the shortest possible time.

These policies and targets also fail to convey the deep carbon cuts that are required to stabilise London’s carbon emissions to tackle climate change. This complacency is further manifested by the omission of a single reference to the Paris Climate Change agreement in the entire draft London Plan.

User: Joan Taplin

I believe that everyone in London has the right to breathe clean air, have access to nature and to benefit from clean energy. I am therefore pleased to see policies in the new London Plan which seek to address these important environmental issues. These include policies to protect our Greenbelt and Metropolitan Open Land, a ban on fracking, and a commitment to London becoming zero carbon.

However, I believe the London Plan could be improved in the following ways:

Renewable Energy & Climate Change

I support the ambition for London to become a zero carbon city, however this needs to be achieved sooner than 2050 if we are to meet our global commitments to tackle climate change. To do this, London needs to rapidly embrace renewable energy, including solar. The London Plan should include a clear policy to facilitate, support and promote the uptake of solar energy.

This could be achieved by adding a strong policy on solar energy (using wording in supporting text 9.2.3), by mentioning renewable energy infrastructure including solar technologies in Policy S13, and by requiring all new homes to be zero carbon.

Green Spaces & Nature

Making London greener is essential for people’s health and wellbeing. Yet many local green spaces face pressure from new development. The Plan must recognise that loss of green space cannot always be made up for through green roofs and sustainable drainage schemes, valuable though these features are (para 4.2.9). Policy should make clear that provision of and access to green space should always be considered when planning new development.

I welcome the reference to urban greening in Policy D7 Public Realm. This should include a broader commitment to, and requirement for, conserving and restoring urban nature rather than the current common approach to installing trees in concrete or tubs and planting of low nature value.

Clean Air

With 10,000 Londoners dying prematurely every year from air pollution, I support the London Plan policy to improve air quality (SI1). Policy T8 states that ‘The Mayor will oppose the expansion of Heathrow Airport unless it can be shown that no additional noise or air quality harm would result, and that the benefits of future regulatory and technology improvements would be fairly shared with affected communities’. The Mayor should consistently apply this policy across all new infrastructure projects, including the proposed Silvertown tunnel which will increase air pollution in an area that already has illegally high levels.

User:	Save Swiss Cottage

6. The draft plan seeks to maintain the status quo with air quality. For example, whilst gas boilers produce roughly half the NOx pollution, and their emission can be reduced with new gas boiler technology, the draft plan does not promote the change over which left to its own devices will take more than 25 years. This is not consistent with Mr Justice Graham's recent findings against the Mayor and Others at the Royal Courts of Justice who stated that the state needs to bring air quality into compliance "as soon as possible", and that "cost is not a determining consideration in choosing the method".

User:	Primrose Hill Conservation Area Advisory Committee
SI 1 We welcome effective and urgent measures to improve air quality.	

User:	Colin Gillespie

With 10,000 Londoners dying prematurely every year from air pollution, I support a policy that seeks to improve this situation.

User:	Helen Walsh

I am writing to respond to your consultation on the draft New London Plan; we must do more to tackle air pollution now! People cannot breathe. Since I moved to London I have developed allergies and severe sinusitis and asthma. More must be done to tackle the huge amounts of pollution - including cigarette smoke and car emissions - on our streets.

User:	Julia Stone
It is important that action is taken as fast as possible now, to clean up our London Air, having an Aim to Clean Up 2050, is certainly too far away!	

User:	Simon Higman

I believe that the proposed extension to the zones where high emission vehicles are restricted should be extended to cover the whole of the area controlled by the Mayor.

User:	Tracy May Brown

Please, I beg you to consider more drastic and speedy measures to improve London’s air quality. I suffer from a chronic lung condition and on days of high pollution levels I am unable to leave my home. Keep lorries out of suburban areas, make bus and taxi companies switch off engines when stationary, impose higher taxes for older vehicles that emit higher levels of pollutants and keep green spaces safe, maintained, open, green, and free to access and use.

User: Regent's Park Conservation Areas Advisory Committees

Chapter 9 Sustainable infrastructure

General request 1: We would welcome a presumption against planning consent for the installation of air-conditioning plant, especially in traditional buildings. Our concern is both to do all we can to minimise the use of energy, but also to address the impact on adjacent buildings, residents and workers.

General request 2: Given the need for more housing, and the development of Town Centres, we are concerned to ensure that the ventilation of retail food outlets does not harm the amenity of residential space.

SI 1 We welcome effective and urgent measures to improve air quality.

Policy SI2 Minimising greenhouse gas emissions

User:	London Sustainable Development Commission

- Interim targets and clear pathways required to set out how zero-carbon will be achieved in the period up to 2050.
- Specific policy guidance relating to carbon targets for smaller development sites
- Further work should be undertaken to determine carbon offset prices for the non-domestic sector.
- The Policy should make explicit reference to the LLDC Learning Legacy document '*Reducing embodied carbon through efficient design*'.
- Boroughs to present a strategy in 2025 setting out how they will contribute to London becoming a zero-carbon city.
- Reference to carbon targets for non-residential development should be included directly within Policy SI2.
- Reference to the requirement for plans to reduce the embodied carbon in construction materials should be included directly within policy SI2.

User:	London Sustainable Development Commission

- Policy SI2 should make reference to how carbon offset funds could be spent on retrofit opportunities.
- Policy SI2 to specifically reference taller buildings, and the possible need for higher targets due to greater inefficiency of these buildings.

User:	Bexley Natural Environment Forum

Policy SI 2 – If Developers cannot teach the desired levels of sustainability required by the Mayor, then they should be made to categorise and give solid reasons as to why, this should then be subject to individual and outside review. Stiffer penalties need to be introduced as currently it is too easy for the developer to just report that they cannot reach the targets and pay into some fund, which they will undoubtedly claw back during the development process.

User: Arup Building Engineering Team

We support a trajectory towards zero carbon and believe that the policy should be 'solution neutral' allowing designers to solve the problem with the most appropriate technology to their site. We also support a fabric first approach to passive design.

We refer to our response to the London Environment Strategy on Zero Carbon, in particular:

“All developments should be required through planning policy to demonstrate that the energy network a development connects to is the option associated with the lowest carbon emissions over the lifetime of the building (whether it be a centralised or decentralised network), based on current and projected future energy supply methods.”

“More emphasis needs to be placed on making sure that new housing to be constructed to help combat London’s housing crisis is built with quality to ensure robustness and resilience, and has low lifecycle energy demands (embodied plus operational energy).”

“All building owners should be required to report on annual operational energy use against industry benchmarks using a consistent methodology, e.g. TM54, providing data post-completion which could be used to inform truly energy efficient building design.”

"A Major development should be net zero-carbon. This means reducing carbon dioxide emissions from construction and operation, and minimising both annual and peak energy demand in accordance with the following energy hierarchy:"

This does not make sense. Net zero-carbon is not the same as reducing. Propose to separate energy use from infrastructure by requiring reporting on kWh and on carbon related to infrastructure, as well as trajectory to zero carbon.

We support the inclusion of embodied carbon as something to be reduced in the path to zero carbon. However, we believe it is important to separate this from operational in reporting as they have very different calculation methodologies. More clarity is needed around the assessment of embodied carbon for developments.

User:	Enterprise M3 Local Enterprise Partnership (LEP)

We welcome the capital’s commitment to meet a zero-carbon target by 2050 and the recognition that 95% of its energy is sourced from outside the GLA boundary Indeed, this is a challenge that regions outside of London also face. We are already working on an energy strategy with a number of neighbouring LEPs and we look forward to working with London LEP as part of a wider partnership to deliver a South East wide BEIS funded Energy Hub that will look at how to achieve this ambition.

User: Hoare Lea LLP`

The calculated emissions reductions for electrical plant, and plant which offsets grid electricity (e.g. CHP) are heavily dependent on the carbon factor of grid-supplied electricity used.

The current Part L 2013 carbon factor, which is used for London Plan energy strategies, is 0.519kgCO2/kWh. However, the reported performance of the grid in 2016 was 0.262kgCO2/kWh according to the National Grid's Future Energy Scenarios 2017 report or 0.274kgCO2/kWh according to the DBEIS Green Book supplementary guidance. This means emissions from electrical plant are being overestimated by up to 98%, whereas emissions savings from CHP are being exaggerated.

This supports the removal of explicit support for CHP: it has been shown that improvements in grid carbon factor mean CHP networks actually cause a net emissions increase over the gas boiler baseline and their relative performance will continue to worsen as the grid decarbonises further. However, under the current framework using the Part L 2013 emissions factors, CHP is most often the only technology which can provide the 35% CO2 reduction required by policy. In order for developments to meet this on-site requirement without CHP, the emissions factors used should be updated to reflect the true performance of the grid such that the calculated emissions reductions for electric technologies such as heat pumps are accurate. Further to this, including a requirement to assess strategies using not only current carbon factors, but those projected to the future, will ensure strategies have long-term relevance. This is important in the context of the carbon offset payments: it has been shown that the emissions savings offered by heat pumps in reality can be over three times greater than those calculated using the Part L 2013 carbon factor. With the proposed increase in the carbon offset price per tonne, any inaccuracy in the calculated emissions of a
development will have a direct and, in the cases of large proposals, substantial economic impact. To reflect the rapidly changing energy landscape in the UK, the carbon offset payments could be made at key intervals, with the sum calculated to reflect the actual emissions of the strategy at that point in time, using reported carbon factors.

If the GLA wish to encourage the shift towards the use of secondary heat sources and electrified heating, the emissions factors should be considered as a priority. Given the rapid reduction in the emissions associated with the use of grid-supplied electricity over the past 4 years and the projected continued decarbonisation, energy strategies would benefit from reporting on both current emissions and projected future emissions. Plant selection and energy performance should be discussed in the context of the anticipated build-out period and lifetime of the proposed plant.

User:	Hoare Lea LLP`

Part B

The requirement to monitor and report on energy performance will be important to determine whether energy strategies are being delivered as designed. f this data is provided to the industry, it could be used to better inform future energy strategies, identify any persistent causes of the ‘performance gap’ and support developers to improve the delivery of their buildings.

User: Hoare Lea LLP`

Part C

It is considered appropriate to strengthen energy efficiency and passive design targets, particularly given the support for electrification and potential increased demand on local electrical infrastructure.

Given the scope of many refurbishment projects, schemes where there is significant modification to or replacement of the building fabric could also benefit from specific ‘Be Lean’ emissions reductions requirements, and these should be linked to a ‘predevelopment’ case as opposed to a Part L baseline.

An increase in the carbon offset price could be considered beneficial as the current price may not provide enough incentive for developers to maximise on-site emissions reductions. However, any increased payment requirement should be balanced with wider discussions of viability.

Currently, it appears that only a small fraction of the money collected in carbon offset payments has been spent.

For larger schemes, where the carbon offset contribution is too large for individual boroughs to manage, an option could be for a board of trustees to be established by the developer, borough, and industry to take responsibility for effectively allocating the funds.

User: Hoare Lea LLP`

Part D

The requirement for boroughs to report on carbon offset fund spending is beneficial and ensuring that the money is ring-fenced for projects that deliver greenhouse gas emissions reductions remains important.

The process could benefit from an incentive or requirement for boroughs to spend their carbon offset fund within a given time period. This could be supported by GLA guidance on how to most effectively achieve this.

Alternatively, a trust-based system as noted in the response to S12C could be developed..

User: Highgate Society

Comment

We support the work conducted by the London Energy Transformation Initiative (LETI) that is based on the experience and knowledge of top building professionals from London and across the world, and included in our submission where indicated. The full recommendations are available from the LETI London Plan recommendation report

https://docs.wixstatic.com/ugd/252d09_b693dc7f0eba49cda769ca6d0ab70df0.pdf and noted by 'LETI' where their work is used. SI 2 general comment. we urge the use of LETI wording for 9.2.9, 9.2.10 g, 9.2.10 h, 9.2.10 I and 9.2.10 k.

SI 2A. Comment:

We urge the use of LETI wording to bring forward zero carbon emissions to 2030 and to add the requirement 'be seen' for post build monitoring and verification.

SI 2B. Comment:

We urge the use of LETI wording

SI 2C. Comment:

We urge the use of LETI wording

SI 2E. Comment:

We urge the use of LETI addition re a nationally recognised carbon lifecycle assessment. As well as the LETI recommendations we would want all proposals to demolish a building to include submitted calculations showing CO_2 emissions for one scenario for the new development, including the demolition of the existing building, and a second scenario for refurbishment of the building. It will be in terms of Global Warming Potential (as specified in EN 15804) i.e. in 'kg CO_2 equivalent.' Where kg CO_2 equivalent is significantly higher for the demolition scenario the application should be refused, unless there are more significant advantages

User: London Borough of Ealing

Minimising Greenhouse Gases
(SI2)

Whilst the policy as a whole is supported, it would be useful to clarify whether in the case of mixed developments, the 35% on site target needs to be satisfied as an average for the whole development (potentially with an element of the development not meeting the target), or whether the target needs to be satisfied separately by each element. In this regard clarity is also sought in respect of the carbon offsetting requirement.

User: Baxi Heating

Combined Heat and Power (CHP)

We welcome the recognition in the New London Plan of the important role of CHP in the expansion of heat networks. The value of CHP in London's energy future is not confined to this market. As the CHP sector continues to innovate, we anticipate that it has a key role in delivering the objectives of the London Plan.

Gas CHP plays a significant role in reducing carbon emissions. Whatever fuel is used, CHP represents the most efficient energy generation of that fuel. CHP using natural gas saves carbon by generating heat and power up to 30% more efficiently than other thermal power stations, and by pushing higher carbon thermal power stations out of the market.

The carbon emissions factor for grid electricity can vary over the course of the day, depending on the power stations operating at each half hour. Balancing of electricity demand and supply is provided on a daily basis by thermal generators, such as coal and gas power plants. Government modelling shows that gas CHP [JH1] will continue to reduce emissions even at very high penetrations of renewable and low carbon energy until the point where its power output exceeds that of other fossil fuel plant, an extremely unlikely scenario. Furthermore, those that are flexible can help address high grid carbon intensity periods.

Therefore, effectively whenever gas or coal is on the electricity system, gas CHP will continue to deliver substantial energy and carbon savings. Other forms of CHP such as waste to energy and renewable CHP can deliver even greater emissions reductions. This means that CHP will continue to provide fuel and carbon savings against the alternative generator, which will be coal and gas generation until 2025, and then gas only through the 2030s. The Government modelling also found that gas CHP will save carbon emissions far into the 2040s and beyond if it is exposed to the wholesale price, as is the case with many schemes.

Unlike minimum technology or emission requirements applied at the source, the requirement for air quality neutrality (or positivity, where relevant) is the benchmark that London's new buildings should be held to, as it is the one which most directly measures real world impacts.

The dispersal of emissions from a CHP can result in improved street-level NOx emissions. The recognition of CHP's air quality benefits requires an accurate and appropriate measurement of NOx produced from CHP plants. It is not effective policy to compare NOx emitted in a dispersed and high level manner from CHP with that from low-level traffic or non-dispersed boiler emissions. In many cases, CHP with well-designed high level dispersion can lead to lower local NOx concentrations than ground level boilers. Future policy needs to account for this dispersion to ensure fair comparison and ensure Londoners receive an optimal air quality outcome. Proposals for larger CHP compared to an ultra-low NOx boiler should allow for dispersal modelling of NOx to ensure the comparison is based on the impact on local residents at street level, in line with the aims of the London Plan.

For smaller single building scale CHP, up to 50kWe output, forthcoming changes to the Ecodesign of Energy Related Products Directive (ErP), effective from September 2018, will require manufacturers to meet very low levels of NOx emissions, yet appropriate to the technology and achievable in practice. We would suggest that future technical guidance reflects these new standards and perhaps gives guidance for what is appropriate for different scales of CHP plant.

Given the overarching national requirement to reduce carbon emissions we would reiterate that CHP offers one of the most cost effective and efficient means to deliver on this ambition, it is imperative that local policy addressing other concerns does not have the unintended consequence of limiting deployment.

[JH1]Can you reference this modelling, Is it BEIS, or committee on climate change

User: CIBSE

Please also refer to our response to the London Environment Strategy, November 2017.

We welcome the overall ambition for zero-carbon buildings.

Reducing carbon emissions from buildings is essential for the UK to meet the requirements of the Climate Change Act. The Committee on Climate Change recently highlighted that progress in reducing carbon emissions from the buildings sector had stalled, and it has recommended tightening carbon standards for new-build and existing buildings. The London Plan would therefore be in line with these recommendations, and demonstrate leadership by adopting measures beyond regulatory compliance.

Current Building Regulations (Regulation 25B) already incorporate a requirement for new buildings to be “nearly zero energy”, but this only comes into force in January 2021 and may be subject to amendment prior to coming into force.

The EU has now agreed the text of the third edition (whatever it will be formally called) of the Energy Performance of Buildings Directive, and this is due to be published shortly. This may introduce further requirements, although these will be subject to the ongoing negotiations between the UK and the EU.

Beyond the above broad principles, we would make the following key recommendations:

- There is a far-reaching consensus that the approach in the existing London Plan, focusing on carbon emissions targets against Building Regulations Part L, does not deliver sufficient reductions in carbon emissions in practice.
- There is a very strong consensus that the current metrics for energy and carbon policy (i.e. based on Building Regulations Part L) are not adequate to deliver carbon savings. The calculations carried out under Part L are for compliance purposes and do not take account of operational realities. They only cover regulated emissions (with unregulated emissions often a very significant part of the total actual emissions), are not necessarily a representation of actual occupation conditions and therefore not a representation of operational performance, and are linked to a carbon emissions factor for the electricity grid which is very much out of date, potentially leading to decisions with detrimental long-term carbon outcomes.

- There is a growing consensus that policies should introduce energy metrics either on their own or in combination with carbon metrics; this should be absolute (i.e. kWh/m2) rather than expressed as relative improvements over a target32. We are aware that at this stage the Mayor's policies have to some extent to be linked to the current system, i.e. Building Regulations and regulated carbon metrics. Therefore as a first stage in the immediate term, we recommend that applicants should be required to report on energy metrics, allowing the GLA to gather information and ultimately inform a modification of policy; we think this should differentiate between different energy sources (gas, electricity…), either by providing a breakdown or by the use of primary energy.
- We would strongly encourage a transition to policy targets based on operational outcomes, rather than on design and practical completion estimates. In particular, we think this should be clearly stated in the overall objective of "zero-carbon city by 2050", and an intermediate objective should be introduced for all
- major new development to be zero carbon in operation by 2030. Such a target is broadly consistent with the objective of ALL existing housing being at least C-rated by 2030, as set out in the Clean Growth Strategy. Setting an ambitious target NOW will enable industry and stakeholders to develop realistic options to meet the target.
- Once policy has moved to operational outcomes, and thanks to the policy requiring monitoring in operation, failures in delivering the expected carbon performance could be captured, for example, at the same tariff as carbon offsets (since effectively, the initial carbon offset of these developments would have been insufficient).

We are aware that while the intention of the London Plan is for carbon reduction targets to apply in major refurbishments which are subject to planning applications, this is often not the case in practice. Many such refurbishments are extensive (often, wholesale replacement of the façade and building services), and they therefore offer substantial opportunities for carbon reduction. There are significant energy and carbon saving opportunities from these refurbishments, which could also contribute to reduced air polluting emissions (policy SI1) through reduced fuel consumption. Guidance should be clearer that the carbon targets do apply for these planning applications, and implementation should be more consistent. There is also a need for better coordination of these projects with the Building Regulations requirements for refurbishment projects. We believe that the revisions to the EPBD do address refurbishment.

We would also highlight the work carried out by the London Energy Transformation Initiative (LETI), which gathers the views of a large number of professionals from a wide range of backgrounds. We would refer the Mayor to the recommendations of the group33, which CIBSE broadly support, and would encourage the Mayor's team to continue liaising with LETI to develop detailed proposals. CIBSE are involved with LETI, and we would also be very happy to collaborate with the Mayor on this.

User: Glass and Glazing Federation

While we are encouraged that the Mayor has acknowledged the importance of energy efficient glass and glazing, we believe the London Plan could go further to make London a zero-carbon city through ensuring every home has energy efficient windows.

Energy efficient windows and glazing refers to double and triple glazed windows, rated A+ to C, in homes and commercial buildings, made of performance glass and a range of vital components. Our expertise and broad membership means we are well suited to support the Mayor in achieving his ambitions for tackling carbon emissions in London and his objective to help Londoners who struggle with rising energy costs by improving the energy efficiency of housing stock.

User: Glass and Glazing Federation

GGF response to Figure 9.2: The energy hierarchy and associated targets

- We support the Mayor's proposals to encourage new developments to aim to achieve 10 per cent and 15 non residential to achieve 15 per cent additional carbon reductions than is set out in Approved Document L.
- The GGF would urge City Hall to place more emphasis on the role energy efficient windows and doors can make in the "using less energy" section of Figure 9.2.
- We urge the Mayor to acknowledge that the installation of energy efficient glazing plays an important role in contributing towards more energy efficient housing, especially when combined with other measures.
- **The Energy Saving Trust (EST) has estimated that as much as 23% of a home's heat energy can be lost through inefficient windows.**
- The results of a twelve month project completed by the GGF has proven that energy efficient windows in all properties of the existing housing stock would reduce national domestic energy expenditure by 10%, and also reduce national emissions by 10%[1].
- Further, GGF research found that **average yearly energy bill savings made after installing energy efficient windows in a typical GB house are £256.58 for a Single Glazed House and £124.02 for a Double Glazed House (pre 2002) – a key objective outlined by the Mayor.**
- Therefore, the GGF urges the Mayor to ensure the installation of energy efficient windows and glazing is a key part of his strategy to reduce the carbon footprint of London, reduce energy bills and improve living conditions for London residents.

[1] "F & G banded homes in Great Britain: Research into costs of treatment" Energy Saving Trust, July 2010

User: Mr Darren Coppins

1. Section 9 provides guidance on the provision of major developments in respect of energy and carbon reduction with limited or no guidance for developments of less than 10 dwellings.

Through the nature of Policy SI2 item C, such fabric reductions can and should be made on individual new dwellings or small commercial units although it is recognised that achieving the full 35% carbon reduction on site may be challenging for dwellings. Considering that dealing with the housing shortage in London will include a large number of individual and small scale (less than 10) homes via schemes such as the Hidden Homes programme, guidance and targets on schemes smaller than 10 units should be provided.

I believe there should also be a requirement for a reduced energy strategy for non-major developments to demonstrate how fabric carbon reduction (Lean), review of local district energy connection (Clean) and renewable energy opportunities have been explored.

2. Guidance should be included on the definition of new dwellings and where the policy requirements apply. For example, new dwellings created within existing commercial premises through permitted development rights, which in my view can target achieving the required carbon reduction and carbon futureproofing whilst highlighting obvious embodied carbon benefits.

3. Policy SI2 item B states that major developments ‘Should’ include a detailed energy strategy. Surely all major developments are required to provide a detailed energy strategy.

4. The information that energy strategies should contain (p328) items g, h, I, k and l are all significant items in their own right but have very limited guidance within the plan. For example, item k – proposals to minimise the embodied carbon in construction. This can be as simple as referring to construction types in the Green Guide to Specification or as complex as calculating the full lifecycle embodied carbon which is a very detailed consulting exercise in its own right.

5. The list referred to above will cloud the key purpose of an energy statement. The quality and deliverability of the guidance within the energy statement must be enhanced rather than clouded with the incorporation of all potential issues into the energy statement.

For example:

a. There are schemes where the carbon reduction performance works on paper but not on site and as a result, systems are left not operating or not achieving the intended carbon reductions. Energy Statements should include a full operational viability assessment along with lifecycle information to prove that the systems are commercially viable against a number of potential operational scenarios (empty units and fluctuating fuel costs) AND where community heat systems are included, that the energy is available at an affordable cost, which should be less, including service charges, than a corresponding gas supply. How much less may need to be governed. Item l. within the list on page 328 & 329 does not provide anywhere near sufficient weight to this issue.

b. The assessment of summer comfort is a separate exercise and both require separate consideration during the early stages of a project. Each should be undertaken and submitted as entirely separate and equally important submissions rather than being a chapter of an energy statement. c. Item h requires monitoring for 5 years. This is very short term and long term monitoring can encourage continual improvement. I also believe that the GLA should provide a free monitoring system for voluntary use to ensure that a suitable monitoring system is available. More importantly, larger developments should report carbon for the life of the development. d. Item k requires guidance to be provided and consideration to the value and longevity of the scheme. For example, can a higher embodied carbon be justified for a residential scheme employing high quality design, thermal mass and a long (indefinite?) lifespan compared to a commercial development in a commercially important location with a lifespan of 20 to 40 years.

User:	Sustrans

We are concerned that there is no reference to the contribution to greenhouse gas emissions from transport, particularly given the thread of Healthy Streets Approach throughout the document. This policy should cross-reference the Transport policies to demonstrate the important role that parking restriction and traffic reduction has in delivering these policy outcomes.

Suggested wording and proposed change(s)

Cross-reference Transport Policies

User:	Sustrans
We welcome attempts to minimise the movements of aggregates by road, given the relative dangers from heavy goods vehicles.	

User: Hornsey & Wood Green Labour Party

We support the work conducted by the London Energy Transformation Initiative (LETI) that is based on the experience and knowledge of top building professionals from London and across the world, and included in our submission where indicated.

We support the LETI recommendations (their changes in brown) to amend SI1 to:

Policy SI 2 - Minimising green house gas emissions A. Major development should have zero carbon emissions in operation by 2030. This means reducing carbon dioxide emissions from construction and operation, and minimising both annual and peak energy demand in accordance with the following energy hierarchy 1) Be lean... 2) Be clean... 3) Be green... 4) Be seen: monitor, verify and report on energy performance in use.

B. Major development should include a detailed energy strategy to demonstrate: how the zero-carbon target will be met within the framework of the energy hierarchy; and [text removed] to monitor and report on energy performance.

C. [text removed] A minimum on-site reduction of at least 35 per cent beyond Building Regulations is expected. Residential development should [text removed] achieve a minimum of 10 per cent, and nonresidential development should [text removed] achieve a minimum of 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided: 1) through a cash in lieu... 2) off-site... ”

E. Referable schemes should quantify whole life carbon through a nationally recognized Carbon Life Cycle Assessment (Carbon-LCA) & demonstrate actions taken to reduce lifecycle carbon informed by this analysis.

9.2.9 to be: The move towards zero-carbon development requires comprehensive monitoring of energy consumption and carbon emissions to ensure that planning commitments are being delivered. Major developments are required to monitor and report on energy performance [text removed] to the Mayor for at least five years via an online portal to enable the GLA to identify good practice and report on the operational performance of new development in London.

9.2.10 g to be: To anticipate infrastructure capacity challenges for a growing London, submit proposals for energy demand management and reductions in peak energy demand

9.2.10 h to be. Demonstrate how energy consumption and carbon emissions post-construction will be monitored monthly and reported annually (for at least five years).

9.2.10 to be: i. Proposals explaining how the site has been futureproofed to achieve zero-carbon on-site emissions in operation by 2030.

9.2.10 k. Proposals to demonstrate actions taken to minimise whole life cycle carbon

User: Hornsey & Wood Green Labour Party

Additionally LETI recommends:

• all new buildings should have zero carbon emissions in operation by 2030. The full meaning of zero carbon and a long term action plan will need to be formed to ensure this goal is achieved. This differs from the GLA net zero carbon definition. The SPG should contain clarity on a long term plan to achieve zero carbon emissions in operation.

• Provide a link to the most up-to-date carbon factors for consultants to use in energy reports alongside the dated Building Regulation Part L values.

• Request the use of an alternative kWh/m2 metric for comparison of energy demand between developments. Seek to adopt a kWh/m2 metric in future policy.

• Request the calculation of unregulated energy/CO2 . Building Regulation Part L and planning carbon targets currently ignore unregulated carbon.

• Request that applications consider: plant space; demand response readiness; energy storage; natural ventilation readiness; glazing tech/fabric upgrade readiness; design for low temperature systems including larger radiators, underfloor heating and use of heat pumps, etc.

• Quantitative demonstration of future proofing should be encouraged.

SPGs should include:

· A clear list of required figures for applicants to monitor, collect and submit. This should include frequency of data collection and submission.

• Proposals for energy monitoring of major new developments during the first five years of operation should measure the following, in order of priority:

1. Base building energy use: regulated energy uses defined by Building Regulations. This correlates with the responsibilities of the developer, their designers, contractors and building managers.

2. Whole building energy use: regulated and unregulated energy uses to capture the total carbon footprint relating to London's objective to become a zero carbon city.

3. Energy used directly by each occupier in a multi-let non-domestic building: this is the difference between the whole building energy use and base building energy use; measuring it gives agency to non-domestic tenants to manage their contribution to the total carbon footprint. For domestic buildings this is dealt with as part of the base and whole building energy use.

• Examples of data collection methods for non-domestic buildings such as display energy certificates (DEC) and landlord energy ratings (LER). Note that DECs mask the activities of individual tenants in multi occupier buildings, so should be complemented by base building ratings and individual outputs from each tenant.

• Request data on efficiency and energy usage to be disclosed from heat networks specifically.

• Request the reporting of energy and carbon per person and per m2 .

• Refer to current Islington Council policy for examples of monitoring in practice.

LETI can provide detailed content for SPGs on the topics of Demand Management and Embodied Carbon. They suggest that the GLA provide a simple online tool and database to provide simplicity and consistency to Boroughs on lifecycle carbon – based on EN 15978 methodology.

As well as the LETI recommendations - sound building should not be demolished without submitting calculations showing CO_2 emissions for one scenario for the new development, including the demolition of the existing building, and a second scenario for refurbishment of the building. It will be in terms of Global Warming Potential (as specified in EN 15804) i.e. in 'kg CO_2 equivalent.' Where kg CO_2 equivalent is significantly higher for the demolition scenario the application should be refused, unless there are more significant advantages.

LETI also suggests that the GLA provides Energy Advocates to Boroughs to write their SPGs, similarly to the GLA Design Advocates, and that there should be more transparency and consistency on the collection and use of cash-in-lieu offset funds.

User: ENGIE

ENGIE welcomes this opportunity to respond to the Mayor’s draft London Plan consultation. In particular we welcome the following:

- The proposal to extend the zero-carbon building target to non-domestic buildings. Currently this target is limited to major residential developments. We believe that extending the target to nondomestic buildings will help reduce building emissions over and above the targets set in Part L of the National Building Regulations, which have seen a gradual watering down in ambition over the years.

User: ENGIE

ENGIE welcomes this opportunity to respond to the Mayor’s draft London Plan consultation. In particular we welcome the following:

- The proposal to create borough level carbon offset funds to facilitate cash in lieu contributions of those developers who are unable to mitigate all their building emissions onsite. We believe that this fund could provide an opportunity to fund more district heating connections. We therefore call upon the GLA to consider heat networks among the technologies to benefit from the proposed offset fund.

User: Mr Sydney Charles

We support the work conducted by the London Energy Transformation Initiative (LETI) that is based on the experience and knowledge of top building professionals from London and across the world, and included in our submission where indicated.

We support the LETI recommendations (their changes in brown) to amend SI1 to:

Policy SI 2 - Minimising green house gas emissions A. Major development should have zero carbon emissions in operation by 2030. This means reducing carbon dioxide emissions from construction and operation, and minimising both annual and peak energy demand in accordance with the following energy hierarchy 1) Be lean... 2) Be clean... 3) Be green... 4) Be seen: monitor, verify and report on energy performance in use.

B. Major development should include a detailed energy strategy to demonstrate: how the zero-carbon target will be met within the framework of the energy hierarchy; and [text removed] to monitor and report on energy performance.

C. [text removed] A minimum on-site reduction of at least 35 per cent beyond Building Regulations is expected. Residential development should [text removed] achieve a minimum of 10 per cent, and nonresidential development should [text removed] achieve a minimum of 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided: 1) through a cash in lieu... 2) off-site... ”

E. Referable schemes should quantify whole life carbon through a nationally recognized Carbon Life Cycle Assessment (Carbon-LCA) & demonstrate actions taken to reduce lifecycle carbon informed by this analysis.

With supporting text now:

9.2.9 to be: The move towards zero-carbon development requires comprehensive monitoring of energy consumption and carbon emissions to ensure that planning commitments are being delivered. Major developments are required to monitor and report on energy performance [text removed] to the Mayor for at least five years via an online portal to enable the GLA to identify good practice and report on the operational performance of new development in London.

9.2.10 g to be: To anticipate infrastructure capacity challenges for a growing London, submit proposals for energy demand management and reductions in peak energy demand

9.2.10 h to be. Demonstrate how energy consumption and carbon emissions post-construction will be monitored monthly and reported annually (for at least five years).

9.2.10 to be: i. Proposals explaining how the site has been futureproofed to achieve zero-carbon on-site emissions in operation by 2030.

9.2.10 k. Proposals to demonstrate actions taken to minimise whole life cycle carbon

User: Ruth Blair

The draft plan seeks to maintain the status quo with air quality. For example, whilst gas boilers produce roughly half the NOx pollution, and their emission can be reduced with new gas boiler technology, the draft plan does not promote the change over which left to its own devices will take more than 25 years.

This is not consistent with Mr Justice Graham's recent findings against the Mayor and Others at the Royal Courts of Justice who stated that the state needs to bring air quality into compliance "*as soon as possible*", and that "*cost is not a determining consideration in choosing the method*".

User:	Landsec

SI1 Improving Air Quality: We support the principle of this policy and recognise the need to improve air quality in London. However, we require further clarification as to how ‘Air Quality Positive’ would be achieved. In addition, we recommend that clearer guidance is offered to developers on possible solutions to meet the energy efficiency targets stated in Policy SI2 given CHP is currently the preferred route for most schemes as it delivers cleaner than grid electricity and low carbon heat but does potentially impact on local air quality.

User: Landsec

S12 Minimising greenhouse gas emissions: We support the aspiration for London to become a zero-carbon city by 2050 and the policy intent to create energy efficient buildings in operation. We believe that the focus of the policy should be to target carbon neutral building operation, using energy efficient heating and cooling systems such as ground or air source heat pumps and with all the energy consumed provided from REGO backed renewable energy sources or offset using an auditable and transparent methodology. We believe that all reasonable measures should be taken to reduce the energy consumption and carbon emissions during the construction process. However, in our view the energy consumed in construction should not be included in the targets set for building operational energy and carbon emissions. In contrast to energy used in construction for operational energy use there is more data to rely on and investment can be made in technologies that will operate throughout the life of the building. We would recommend that the definition of the greenhouse gas emission policy should be amended to read as follows:

"*A. Major development should be net zero-carbon in operation. This means reducing carbon dioxide emissions from construction and operation, and minimising both annual and peak energy demand in accordance with the following energy hierarchy:*

1. *Be lean: use less energy and manage demand during construction and operation.*
2. *Be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly. Development in Heat Network Priority Areas should follow the heating hierarchy in Policy SI3 Energy infrastructure.*
3. *Be green: generate, store and use renewable energy on-site. Electricity should be provided from REGO (Renewable Energy Guarantees Origin) backed renewable energy sources*."

User:	Landsec
We believe it will be important to provide clarity on the definition of zero carbon (or carbon neutral in operation) and that this should be aligned with the definitions and standards used internationally by other world cities.	

User: Landsec

Great steps have been made to improve the energy efficiency of buildings in response to increasingly challenging Building Regulations and London Plan policies but with the current level of technology choices and the challenges of working in an intensive urban environment it will not always be possible to achieve the proposed targets from on-site measures alone. This will then trigger the carbon offset payment mechanism.

The combination of a zero-carbon target and an increased carbon cost per tonne will result in much higher payments being demanded. We are concerned about the potential negative impact on development viability arising from the potential level of payments to the carbon offset funds and would refer you to case study examples included in the Alliance response. If the draft Plan is not amended to provide the clarity on how the targets can be achieved and to reduce potential costs arising from the payment, this policy will have a significant impact on viability and will come at the expense of other important Plan objectives such as affordable housing and overall housing numbers.

User:	Landsec
9.2.7: We recommend that where schemes are unable to meet the desired energy efficiency measures in accordance with improvement over Part L, offsetting be allowed off-site elsewhere in the developer’s portfolio, through investment in other carbon saving or energy efficiency projects. Where the developer has no such project available, alternatives should be sought in the relevant borough to allow the developer to invest the offsetting fund in a tangible and local alternative.	

User:	Landsec

9.2.10: Minimum requirements of energy strategies: The Plan goes into a lot of detail prescribing the content of an energy strategy (listing items from a-l) that we do not think is appropriate for a strategic planning document. The Plan should set out the objectives and aspirations in terms of energy, but leave the content to be determined on a site by site basis and in accordance with latest technology and practice. The detailed specification requirements are also better managed via building regulations, rather than as part of the planning process. We therefore suggest the text in this part of the plan be amended so it clear that it is guidance rather than a mandatory requirement.

User: ADE - Association for Decentralised Energy

Response to proposals related to Demand-Side Response (DSR)

The ADE is encouraged by the Mayor's vision for a 'smart' city, and welcomes the recognition that smart technologies, including DSR, have a crucial role to play in London's future infrastructure.

The Association is supportive of the proposal that smart technologies and DSR be actively considered in development proposals. In recognition of the complexity of interaction between different solutions, we would welcome the opportunity to work with the GLA as detailed plans in this area are developed, to ensure that the interactions between this and other policies – including those related to air quality - are fully considered.

The next 5 years are crucial to establishing a strong, vibrant DSR market in the UK – allowing businesses and households to manage their energy costs whilst supporting the grid's resilience. Recent reforms announced by National Grid to transform the market for balancing services and their early involvement in the EU-wide balancing mechanism, TERRE, are welcome in opening up markets to broader competition. Similarly, BEIS and Ofgem's Smart Systems and Flexibility Plan and Ofgem's current reform of forward-looking network charges have the potential to resolve numerous barriers to entry and more fully reflect the system value of DSR. As we transition to these new market arrangements, it is crucial that policy at both national and devolved levels is coordinated and ensures that the UK's growing DSR industry can compete effectively.

User: Redrow Homes London Division.

We welcome the recognition that shortfalls against zero-carbon targets can be addressed through ‘alternative proposals’ as well as cash in lieu contributions.

Part D as drafted is too weak and needs to be made more robust.

It is agreed that offset funds have potential to unlock carbon savings. However, they have to be used and used effectively. The Mayor should be firmer that LPAs must be clear regarding their energy strategies and set timescales on delivery. If not, this risks becoming a ring-fenced pot of money that is not spent and so zero carbon targets are not in fact achieved.

User:	Redrow Homes London Division.

Major development is ‘expected to monitor and report on energy performance’. The supporting text suggests that performance is reported to the Mayor for at least five years.

The London Plan must be clear on whose duty it will be to report performance. This responsibility should not lie with the applicant (who may not be the same as the developer or contractor) but with an appointed specialist.

User:	Redrow Homes London Division.

The draft London Plan states that ‘The minimum improvement over the Target Emission Rate (TER) will increase over a period of time in order to achieve the zero-carbon London ambition and reflect the costs of more efficient construction methods. This will be reflected in future updates to the London Plan.’ It is essential that higher standards are not applied until these have been tested via the London Plan examination process.

User: Redrow Homes London Division.

Footnote 120 states that ‘Boroughs should develop a price for offsetting carbon using either a nationally recognised carbon pricing mechanism or a price based on the cost of offsetting carbon across the borough. A nationally recognised non-traded price of £95/tonne has been tested as part of the viability assessment for the London Plan which boroughs may use to collect offset payments.’

The London Plan must be clear to Boroughs that they must only refer to an evidenced price £/tonne based on the cost of offsetting carbon across the borough. They must not refer to a generic carbon pricing mechanism. The evidence must refer to costed carbon projects to be delivered in the Borough and for the specific benefit of the Borough (including its residents and businesses). The development industry’s view is that a sum as high as £95/tonne will rarely if ever turn out to be justifiable once such an assessment is undertaken.

The London Plan should also be explicit throughout that any contributions / obligations sought would detrimentally affects a scheme’s ability to address other planning objectives, including the delivery of affordable housing.

User:	London City Airport
The Airport supports the objective of minimising greenhouse gas emissions and the need for all development to reduce carbon dioxide emissions from construction and operation.	

User: Mr Gary Hayes

Policy SI2 Minimising greenhouse gas emissions

Given the London Plan proposals for development of such high levels of new home building, the Mayor is remiss in not ensuring full assessment of the impact of all carbon emissions in developments (including embodied carbon).

The UK government pledged to reduce carbon emissions by 80% by 2050. The Centre for Sustainable Development says that in order to meet that target it is necessary to reduce not just the operational carbon emitted (once a building has been constructed), but also the embodied carbon (the processes of material extraction, manufacturing, delivery to site, construction processes, and also demolition and recycling).

Faithful and Gould (who have worked with RICS) suggest that the amount of embodied carbon used to make a building can be as high as 65%.

Our interest in this is also that in the assessment of the environmental benefits relating to refurbishment or demolition of homes, demolition can appear to be a better option (despite actually being more damaging to the environment) where embodied carbon is excluded in the assessment.

While ‘proposals for minimising embodied carbon in construction’ is mentioned in supporting text 9.2.10, this is insufficient in terms of total embodied carbon in a ‘cradle to grave’ analysis. Policy SI2 should require assessment of embodied carbon in both new 17 developments and in refurbishment schemes and provide a target for reducing embodied carbon emissions.

User: SMMT

2. SMMT welcomes the opportunity to respond to Transport for London's (TFL) proposal for changes to the Low Emission Zone (LEZ) and expansion of the Ultra Low Emission Zone (ULEZ). This response outlines our position.

3. In summary, SMMT:

- SMMT supports the requirement for heavy vehicles to meet the Euro VI standard in the Low Emission Zone.
- Suggests a flexible approach to enforcement for fleet operators planning to upgrade their vehicles.
- Before a final decision is made on the current proposals, SMMT believes the cost benefit analysis that is being undertaken should be published, ideally giving
- stakeholders sufficient time to consider and provide feedback.
- Similarly, SMMT believe it would be useful to understand what assessment was made of the different boundary options before deciding on this proposal.
- We would urge additional measures to support the use and uptake of ULEVs are implemented to support the aims of these proposals.

Background

4. SMMT recognises the challenge faced by central, regional and local government to reduce air pollution in order to improve overall health and wellbeing. Although air quality has improved over time, it is clear more still needs to be done to reduce pollutant concentrations even further.

5. The automotive industry has invested significantly to develop a portfolio of technologies that will address the challenges of reducing carbon and pollutant emissions from vehicles. Average new car CO2 emissions for 2016 were 120.1 g/km and have fallen 33% since 2000; this rose to 121g/km in 2017 due to the shift away from diesel vehicles towards petrol. Vehicles being produced today feature filters that capture over 99% of particulate emissions, making them the cleanest ever produced. Compared to 2000, nitrogen oxides (NOx) are down 64%, particulates (PM10) are down 90% and carbon monoxide (CO) levels are down 22%. The introduction of Euro 6 sees an 84% drop in NOx emissions in diesel cars since 2000.

6. Evidence from bus testing on the London-specific test cycle demonstrates that there has been up to a 95% reduction in NOx emissions from Euro V to Euro VI. The success of Euro VI technology introduced in 2013 for heavy commercial vehicles and investment in lower emission trucks and buses demonstrates the significant results in achieving emission reductions in this part of the industry. The UK bus sector in particular is leading the way in Europe with the introduction and use of hybrid and zero emissions technologies. Data from Putney High Street and Brixton Road automatic monitoring stations show the significant improvement in NO2 concentrations achieved after the introduction of the clean bus corridors. We look forward to seeing further improvements in London's air quality once the entire bus fleet is ULEZ compliant. Given the commitment and significant investment in this area, SMMT believe this should be reflected in government and local authority plans by mandating the requirement for Euro VI fleet within procurement specifications.

Principles

7. In November 2013, SMMT developed principles to help guide policy development related to ULEZ proposals. The summary of these principles can be found below:

- Ensure ULEZ policy stems from a strategic approach to reducing emissions in London and is consistent with the wider regulatory direction of travel on air quality and CO2.
- ULEZ should be part of a coordinated approach on air quality between local, national and European authorities.
- The creation of an ULEZ should help promote London as a leading city in Europe for the uptake of ultra low emission vehicles, resulting in economic benefits for the rest of the UK.
- Operational aspects and emissions criteria must take into account the impact on businesses and vehicle and road users.
- The scheme should be clear, transparent, easy to understand and affordable.
- Emissions criteria must reflect recognised regulated emission standards and be technology neutral.

Changes to the LEZ

8. Euro VI heavy goods vehicles and buses have been available for a number of years and we support the requirement for heavy vehicles entering the LEZ to be Euro VI compliant. SMMT supported the original implementation date of 2020 when the proposals were originally consulted on back in 2014, this gave operators sufficient time to renew their fleet to ensure compliance with the emissions standards and allowed them to continue operating within the zone without severe financial penalty. The proposed changes may lead to some operators in outer London unable to upgrade their fleet in time and incur additional charges as a consequence. We ask that TfL take a flexible approach to enforcement by considering a sunset period for those operators that are committed to upgrading their fleet

Increasing the geographical area of the ULEZ

9. In our previous consultation responses, SMMT outlined the need to see further analysis of the cost effectiveness of a change in policy alongside the impact on reducing pollution in air quality hotspots and areas where air quality levels are exceeded. We again re-iterate the need for a full cost benefit analysis to demonstrate that this option will be the most cost effective for reducing pollutant concentrations.

10. We understand from consultation events held by TfL that a cost benefit analysis is currently underway, however, it is disappointing to not be able to review this alongside the proposal and would seek clarification as to whether a decision on the intended policy will be held off until stakeholders have had ample time to review this.

11. It is also unclear as to why a north/south circular boundary was chosen over a London wide ULEZ. SMMT would welcome details of the assessment process undertaken detailing the various options appraised before deciding on the current proposal.

12. With the cost of the western extension reported to be £100m, it is credible to assume the cost of installing the required infrastructure and carrying out the works associated with creating and monitoring a new enforcement cordon will be significant. The cost and anticipated air quality benefit from enforcement should be assessed against funding incentives that support individuals and businesses to upgrade their vehicles to meet the ULEZ emissions criteria.

13. SMMT considers a phased approach to improved emissions standards across Greater London would achieve a greater reduction in pollutant concentrations and make it simpler for drivers to understand. The creation of an additional zone will lead to confusion for drivers particularly those that travel infrequently and from outside of London. SMMT had previously supported the proposal to have the ULEZ match the existing congestion charge zone (CCZ) area. We understand that NO2 concentrations continue to exceed the objective limits even outside of this area however it is essential that clear and consistent emissions criteria is in place so that drivers can upgrade their vehicles with enough lead time.

14. The breakdown of concentrations by borough shows a 2020 baseline in all boroughs to be below the annual mean objective limit. It is not clear what assumptions have been made in reaching this baseline figure; this is significantly different from the data provided by Defra in the UK plan for tacking roadside nitrogen dioxide concentrations which states that by 2020 Greater London will still have NO2 levels of 66µg/m3 . SMMT would welcome further information to explain the differences between these figures. Additional measures to improve air quality

15. Fleet renewal plays a key role in improving air quality across the UK however the current monitored concentrations in London suggest this may not be enough to reach compliance with the air quality objective limit for NO2. Further measures to improve air quality will still be required alongside changes to the ULEZ. Whilst the ULEV market is growing, these vehicles still only represent 1% of the overall vehicle parc. Support for the uptake of ULEVs is still therefore required through both recharging solutions and consumer education as well as battery development and more affordable vehicles.

16. We note the Mayor and many local authorities are encouraging the use of car clubs as part of the overall desire to move towards sustainable urban mobility. However, the current administration of parking across London by boroughs does not lend itself to the promotion of London wide car club networks. SMMT urges the Mayor to use his convening powers to implement a system that allows car clubs to be deployed in all boroughs with access to recharging infrastructure.

17. SMMT reiterates the importance of creating an environment that provides additional incentives for ULEVs such as reduced or free parking and use of bus lanes.

User: Andrea Carey Fuller

Given the London Plan proposals for development of such high levels of new home building, the Mayor is remiss in not ensuring full assessment of the impact of all carbon emissions in developments (including embodied carbon).

The UK government pledged to reduce carbon emissions by 80% by 2050. The Centre for Sustainable Development says that in order to meet that target it is necessary to reduce not just the operational carbon emitted (once a building has been constructed), but also the embodied carbon (the processes of material extraction, manufacturing, delivery to site, construction processes, and also demolition and recycling).

Faithful and Gould (who have worked with RICS) suggest that the amount of embodied carbon used to make a building can be as high as 65%.

Our interest in this is also that in the assessment of the environmental benefits relating to refurbishment or demolition of homes, demolition can appear to be a better option (despite actually being more damaging to the environment) where embodied carbon is excluded in the assessment.

While ‘proposals for minimising embodied carbon in construction’ is mentioned in supporting text 9.2.10, this is insufficient in terms of total embodied carbon in a ‘cradle to grave’ analysis. Policy SI2 should require assessment of embodied carbon in both new developments and in refurbishment schemes and provide a target for reducing embodied carbon emissions.

User:	Cross River Partnership

This policy is necessary and welcomed, but should specifically state that action taken to reduce greenhouse gas emissions should not adversely affect local air pollution (e.g. installation/burning of renewable fuels such as woodchip). It is also noted that the establishment and administration of a carbon offset fund, however laudable, will represent another additional cost on Boroughs.

User: Lendlease

Lendlease remains committed to optimising our sustainability contribution and performance through environmentally responsible outcomes. As part of our Sustainability Framework (as introduced in 2014) we seek to create places with lighter environmental footprints by (for example) using more renewable energy and materials with lower energy impacts.

On this basis we support the principle of CO2 reduction targets, however, we have some concerns regarding the deliverability of this policy in terms of non- domestic uses. The evidence base has only tested a limited scope of non-domestic uses to establish the draft policy target.

The proposed inclusion of carbon dioxide emissions linked to construction activities in the zero-carbon target (including both embodied CO2 in building materials and on-site construction activities) is onerous and there are no benchmarks for construction emissions, and they will vary considerably between the size of sites and nature of construction and clarification is requested.

User:	Wimbledon East Hillside Residents' Association

Zero Carbon: London should be aiming for zero carbon starting TODAY, NOW. Each and every new build - whatever it is - should be zero carbon. BREEAM Excellent. Stop allowing bargaining chips to be traded, and force developers to get going on protecting our natural resources, and become advocates for a better, more sustainable city. Even New York is beating London, because all new buildings are low energy, low carbon footprint. (please see our checklists we use here in Wimbledon for developers to become better environmentalists)

User:	Broxbourne Borough Council
This Council particularly supports the aim for London to be a carbon zero city by 2050	

User: L&Q

Zero carbon

We welcome the recognition that shortfalls against zero carbon targets can be addressed through ‘alternative proposals’ as well as cash in lieu contributions.

Part D as drafted is too weak and needs to be made more robust. It is agreed that offset funds have potential to unlock carbon savings. However, they have to be used on clearly funded schemes and used effectively, as per Section 106 tests. The Mayor should be firmer that LPAs must be clear regarding their energy strategies and set timescales on delivery. In the absence of the above, this fund risks becoming a ring-fenced pot of money that is not spent and so zero carbon targets are not in fact achieved. We also believe that the policy should explicitly allow and encourage landowners to apply offset sums to any other landholdings they have in the Borough. This could be a more direct and effective way of meeting the aims of the policy, particularly for landlords, such as Housing Associations, who can demonstrate to have an active programme to improve the energy performance of its existing stock.

User: L&Q

Monitoring zero carbon

Major development is ‘expected to monitor and report on energy performance’. The supporting text suggests that performance is reported to the Mayor for at least five years.

The London Plan must be clear on whose duty it will be to report performance. This responsibility should not lie with the applicant (who may not be the same as the developer or contractor) but with an appointed specialist.

User:	L&Q

Improvement in the Target Emission Rate (TER)

The draft London Plan states that ‘The minimum improvement over the Target Emission Rate (TER) will increase over a period of time in order to achieve the zerocarbon London ambition and reflect the costs of more efficient construction methods. This will be reflected in future updates to the London Plan.’

It is essential that higher standards are not applied until these have been tested via the London Plan examination process.

User: Design for Performance initiative

Policy SI2 ‘Minimising greenhouse gas emissions’ needs to address the performance gap challenge if it is to deliver its intended outcomes: lower and eventually net zero carbon emissions by 2050, in reality.

The ‘Design for Performance’ (DfP) industry led and backed initiative involving a wide range of key stakeholders aims to end the culture of satisfying theoretical efficiency metrics and instead target outcomes using the Commitment Agreement process that has transformed prime office development in Australia. A Commitment Agreement commits a developer and their main contractor from the outset to achieving a specific base building energy performance verified by measurement. DfP has conducted a 3 year programme of work including a feasibility study and a pilot programme which provide a sound evidence base from which to develop such a scheme in the UK. It is now embarking on a transition phase which aims to establish a fully-fledged DfP scheme in the UK in 2019.

This DfP initiative response to the London Plan consultation makes precise and targeted recommendations for how both these clauses could best be achieved. We propose the GLA capitalises on the new frameworks for setting targets and monitoring the energy performance of non-residential developments that are being introduced by BREEAM New Construction and the DfP initiative, both of which learn from and implement the successful approaches that have been proven to work strikingly well in Australia for over a decade. We additionally propose that where a new building has a single occupier, the GLA deploys the UK's standard methodology for reporting the operational performance of a whole building: the Display Energy Certificate.

A critical principle underlying this response is that the measurement of the in-use performance of a new development, for comparison with the performance predicted at the design stage, must be preceded by a 'design for performance' process: it would be futile simply to measure performance outcomes if no effort had been made to target those outcomes during the design, construction and early operation stages.

To underwrite the Mayor's goal to move towards a zero-carbon city by 2050, DfP urges the GLA to frame the energy and carbon policies in the new London Plan around three key attributes:

1. performance outcomes
2. target setting within the context of a transition to net zero emissions
3. disclosure: the power of transparency around performance outcomes to mobilise all involved.

These attributes are core features of the proven DfP process and lie at the heart of the recommendations we have made in this response to the London Plan draft for consultation. These recommendations are based on the DfP initiative's research, industry engagement and dialogue with the GLA, and will directly support the GLA in achieving its Policy SI2 ambitions effectively; they are summarised in Table1

		Annual energy reporting for 5 years after occupation	**Annual energy reporting for 5 years after occupation**	**Annual energy reporting for 5 years after occupation**
All new major developments and refurbishments	Commit to BREEAM New Construction 2018 **Verification Stage**	Base building energy use broken down by energy end uses plus context for benchmarking	Project Agreement with 4* minimum Landlord Energy Rating target and public disclosure of actual outcome	Production of Display Energy Certificate (DEC)
with non-residential space NLA > 2,000 m^2	yes			
with non-residential space NLA > 5,000 m^2	yes	yes		
with office space NLA > 2,000 m^2	yes	yes	yes	

Policy SI3 Energy Infrastructure

User: Mr Will Griffiths

THE DOGMATIC BELIEF THAT HEAT NETWORKS REDUCE CO2 EMISSIONS CONTINUES

- The plan continues to require new developments to specify heat networks despite these not necessarily reducing CO2 in most cases. They almost certainly increase heating costs, lock homeowners to a single heat supplier and cause an overheating risk
- There are likely better ways to reduce CO2 emissions from heating, particularly as new-build developments feature a low heat demand and expressly are a poor-pairing for heat networks. Better to tackle existing dwellings if essential to deploy heat networks – a minimum heat demand must form part of GLA rules.
- S14 discusses overheating, but doesn't adequately link into S13 and specify minimum performance requirements. There are many legal cases throughout London in which homeowners are living in overheating dwellings owing to poor heat network specifications.
- Heat networks are unlikely to assist UK PLC, since most or all components come from Overseas
- The plan has a reference to the CIBSE/ADE Code of Practice for heat networks, but the GLA need to be far more specific in design and specification rules. The Code of Practice is itself very flexible and only recently introduced, it may still give flexibility for poor performance. The GLA should be very confident in performance expectations before continuing the dogmatic forcing of heat networks on Londoners.
- For reference, the UK's National Calculation Methodology for energy rating of dwellings (SAP) will be changing in 2018 to provide more realistic default assumptions for heat network pipework heat losses (https://www.bre.co.uk/filelibrary/SAP/2016/CONSP-04---Distribution-loss-factors-for-heat-networks---V1_0.pdf). SAP needed to change owing to a divergence in performance Vs default assumptions. These defaults were developed on the basis of assumptions that dwellings had higher heat losses and heat networks were properly deployed. As dwelling fabric efficiency has improved and evidence has shown that heat networks are not being properly deployed, default assumptions needed to change. This will mean Building Regulation compliance for new-build dwellings connected to heat networks will become harder in future. Has the GLA undertaken an impact analysis on the likely increased cost of compliance to Housing Developers?

User:	Mrs Elise Kidd
Welcome the amendments to the energy hierarchy	

User:	Mrs Elise Kidd
Pleased to see heat map being updated	

User: Miss Aliki Papasifaki

D

Swap clauses a. and b. and re-phrase to include energy sharing and efficiency measures.

Merge clauses c. and d.

Merge clauses e. and f. and re-phrase.

Proposed wording:

D. Major development proposals within Heat Network Priority Areas should have a communal heating system.

1) the heat source for the communal heating system should be selected in accordance with the following low carbon heating hierarchy:

a. connect to an energy sharing network through the capturing and using of waste heat and/or use of available local secondary heat sources.?

b. connect to a local existing or planned heat network where it is demonstrated to be running efficiently, the cost of heat to occupants is comparable to national average heating fuel costs, and there is a zero emissions transition plan in place to ensure that the development achieves zero carbon emissions in operation (if it is not already fossil fuel free). ?

c. generate clean heat and/or power from zero-emission sources (examples include: solar technologies, heat pumps and energy storage powered by renewables). ?

d. use low emission combined heat and power (CHP) (where suitable for size and demand of development)?or ultra-low NOx gas boilers (in areas where legal air quality limits are exceeded all development proposals must provide evidence to show that any emissions related to energy generation will be equivalent or lower than those of an ultra-low NOx gas boiler). If the development uses fossil fuels then a zero emissions transition plan must be in place to ensure that the development achieves zero carbon emissions in operation by 2030. ?

User: Earthdome Ltd

Please include the following in S13

New and emerging technolgies and inventions that can improve the efficency of London heat networks and existing or prosed gas boilers of any size should be encuraged to come forward to the Mayors office for consideration and support.

End

Note: The Mayor may consider a regular funding compertition for new and emerging technologies and inventions related to Energy Infrastructure in London.

User: London Borough of Hammersmith and Fulham

Section A of the Policy requires boroughs and developers to work with the energy companies to establish future energy requirements as a result of large-scale development proposals. This is acknowledged and welcomed as it is sensible for all parties to have early discussions on these issues for major development proposals, especially at Opportunity Area etc scale. This could also include reference to major developments.

Section B sets out requirements for Energy Masterplans which should be developed for large-scale development locations. The checklist covers a number of logical and relevant areas such as determining heat loads, identifying preferred approaches etc that would be the most efficient ways of using and distributing heat. We note the inclusion of “energy from waste” on the list, which we have some potential concerns about in terms of whether or not such processes can be suitable in dense inner London Borough such as H&F, but accept that this might be capable of being utilised in some boroughs without creating undesirable impacts.

Suggested change in text

Suggest amending the Policy as follows: “Boroughs and developers should engage at an early stage with relevant energy companies and bodies to establish the future energy requirements and infrastructure arising from large-scale development proposals such as Opportunity Areas, Town Centres, Major Developments and other growth areas or clusters of significant new development”.

User: London Borough of Hammersmith and Fulham

Section C sets out Development Plan requirements in relation to identifying the need and suitable sites for any necessary energy infrastructure and also requires existing heating/cooling networks and opportunities for expanding existing or establishing new networks to be identified.

This is useful guidance for LPAs, although on a matter of consistent formatting, SI2 also includes guidance for the Boroughs but it has not been presented as a separate “Development Plan requirements” section. This format, which mirrors that used in the current London Plan is useful is easily identifying requirements for the Boroughs and is an approach that should continue to be used.

Suggested change to text

No changes here – but possibly in other sections in order to provide a consistent way of presenting Policy requirements, particularly where requirements are set out for the boroughs to follow or implement.

User: London Borough of Hammersmith and Fulham

Section D sets out the requirement that major development proposals within specific Heat Network Priority Areas should have a communal heating system and that the heat source for the communal heating system should be selected in accordance with the hierarchy set out in the Policy.

This approach is generally supported although within the hierarchy, we suggest requiring heat and/or power to be generated from zero-emission sources should refer to low or zero carbon/greenhouse gas emissions sources. The first part of the hierarchy (a) connecting into to an existing or planned heat network could presumably lead to increased emissions of pollutants such as NOx which would not be desirable so some thought has to be given to this scenario. Also, the 'qualifying' text in brackets for fuel cells and CHP (bullet points (d) and (e)) may be better off being presented outside of the Policy text box. Also, as currently worded, text refers to areas that are exceeding the air quality objectives but there are many areas of poor air quality that are close to exceeding within air quality management areas. The wording should be amended to relate to areas that are just meeting the air quality national objectives because the cumulative impact of increased combustion point sources could result in a failure to meet the air quality objectives.

The emphasis in this Policy on the need for CHP and gas boiler systems to be designed to ensure that there is no significant impact on local air quality is welcomed, as is the need new heat networks to be designed for connection at a later date which is also covered in this section of the Policy. However, the wording in terms of the impacts on local air quality needs to be consistent with the wording in Policy SI1.

It is not clear what the GLA wants to happen in areas that are not identified as being Heat Network Priority Areas. (Not relevant for H&F as the whole borough is a Priority Area, but may be useful for other boroughs).

Suggested change to text

Amend the text to D(2) as follows: "CHP and ultra-low NOx gas boiler communal or district heating systems should be designed to ensure that <u>they do not lead to a further deterioration of existing poor air quality".</u> there is no significant impact on local air quality.

User:	London Borough of Hammersmith and Fulham
Welcome the commitment given here that the Mayor will work with boroughs, etc to promote the development of London’s energy system.	

User: London Borough of Hammersmith and Fulham

Agree with the position of the GLA explained here that there need to be changes to the way we use and supply energy so that power and heat for buildings and transport is generated from clean, low-carbon and renewable sources.

We note the argument made here that London will need to shift from its reliance on using natural gas as its main energy source to a more diverse range of low and zero-carbon sources, including renewable energy and secondary heat sources.

We are not 100% clear how the drive to reduce use of gas can work in a consistent manner with the emphasis on using decentralised energy systems, which are invariably (for now at least) run on gas, so this is an area where it would be good to provide more supporting information to show that these aims can work together and are capable of both being achieved and are not contradictory.

Suggested change to text

Include a better explanation of how London can increase its use of communal decentralised heating systems whilst also reducing its reliance on gas.

User:	London Borough of Hammersmith and Fulham

This paragraph states that developments should connect to existing heat networks and that the delivery of new district heating infrastructure should be stimulated where feasible.

The whole of H&F has been identified by the Mayor as a Heat Network Priority Area which is agreed given the nature of the borough – i.e. it is one of a number of boroughs where the heat density is sufficient for heat networks to provide a solution for supplying heat to buildings and consumers.

User:	London Borough of Hammersmith and Fulham

We agree with the sentiments of this paragraph that where developments are proposed within Heat Network Priority Areas but are beyond existing heat networks, the heating system should be designed to facilitate future connection.

User:	London Borough of Hammersmith and Fulham

This paragraph notes that the Mayor supports standards such as the CIBSE CP1 Heat Networks: Code of Practice for the UK and the Heat Trust standard to help in delivering well designed heat networks.

Suggested change to text

No change, but recommend that these industry standards are referenced again in any revised GLA SPD/guidance documents.

User: London Borough of Hammersmith and Fulham

This paragraph states that further information about the relevance of CHP in developments of various scales will be provided in the Energy Planning Guidance document, which is welcomed.

It is also clearly stated that “it is not expected that gas engine CHP will be able to meet the standards required within areas exceeding air quality limits with the technology that is currently available”. This is actually a very important point, and one that should be given more emphasis.

Suggested change to text

With regards to the point about gas CHP not being suitable in air quality exceedance areas, this a point that should be made more clearly in the Policy.

User: London Borough of Hammersmith and Fulham

This paragraph's support for increasing the amount of new renewable energy generation in new developments is welcomed. However, we note that the list of example technologies given in this section does not mention heat pumps which we would have thought would play a major part in providing London's future energy requirements.

Suggested change to text

Amend the text as follows: "Increasing the amount of new renewable energy sources in London developments is supported. This includes the use of energy from waste schemes that are connected to a heat network, as well as heat pumps, solar photovoltaics and solar thermal, both on buildings and at a larger scale on appropriate sites. There is also potential for wind and hydropower-based renewable energy in some locations within London.

User: London Borough of Hammersmith and Fulham

This paragraph notes that the Mayor will work with the electricity industry, boroughs and developers to ensure that appropriate infrastructure is in place to meet London's electricity needs. This is welcomed.

Electricity supply and demand is likely to become a key topic in terms of London's future energy strategy. Demand is expected to rise in London in part as a result to the move over to widespread use of electric vehicles and electrically driven heating systems in buildings.

We note the concerns raised here about the fact the electricity network and substations are at or near to capacity in a number of areas, especially in central London and urge the Mayor to develop a strategy outside of the London Plan process to manage these infrastructure requirements.

Suggested change to text

No change, but urge the Mayor to look at the issue of electricity infrastructure in London separately outside of the London Plan process in partnership with energy companies and boroughs.

User:	London Borough of Hammersmith and Fulham
The points raised in this section in relation to gas supply infrastructure and the need to cover this issue in Energy Masterplans are supported.	

User:	London Borough of Hammersmith and Fulham

This paragraph just notes that the gas supply companies in London are implementing significant gasholder de-commissioning programmes, replacing them with smaller gas pressure reduction stations, often releasing brownfield sites for redevelopment. This is supported, as shown by the proposed redevelopment of the Fulham Gasworks site.

User:	London Borough of Hammersmith and Fulham

We note the issue raised in this paragraph regarding the need for land being required for energy supply infrastructure including energy centres.

User: Environmental Services Association

ESA recommends deletion of “possible”, with policy B4 therefore amended as:
(B4) opportunities to utilise energy from waste

ESA welcomes acknowledgement (in Policy B4 and section 9.3.7) of the positive role Energy from Waste (EfW) has to play in meeting London's energy needs, but we note a disconnect with the recent consultation on London’s Environment Strategy, which was altogether less positive towards the role of EfW. For consistency we suggest that the Environment Strategy should adopt a similar approach as the London Plan.

London needs a joined up and integrated and approach between planning and energy policy to ensure London fully realises the benefits of EfW CHP. Unless the Plan can provide the planning policy framework to help deliver the associated heat network infrastructure and heat customers in the right place most EfW plants will likely remain “CHP ready” but nonetheless operate in electricity-only mode.

The London Plan should also provide a delivery framework against which the success of developing heat network infrastructure can be judged.

User:	Environmental Services Association

Please refer to our response to S13 B4 above, which note that London needs a joined up and integrated approach to planning and energy policy to ensure London fully realises the benefits of EfW CHP.

User:	Centrica

As CHP specialists and the only low NOx CHP manufacturers in the UK, with our improved and proven range of CHP engines, we are able to achieve levels of less than 50mg/Nm3 @ 5% O2 that are sustained across the lifetime of the emissions system of its new CHP range. This is almost half of the most stringent emissions limit set by both BREEAM and the new Greater London Authority (GLA) within the Sustainable Design and Construction guidelines (95mg/Nm3 @ 5% O2). It is five times lower than the more widely accepted limit of 250mg/Nm3 @ 5% O2.

User: Fuel Poverty Action

Below we comment at length on one aspect of the London Plan - the commitment to Heat Networks (here called "District Heating"), and then briefly on the issue of a public energy company for London, and on the Community Energy Fund.

1. District Heating

For the past two years Fuel Poverty Action (FPA) has been working with heat network customers in seven inner and outer London boroughs, many of whom have been having terrible problems with their District Heating systems in terms of reliability, service, and/or cost. (We here use the term District Heating (DH) to refer to all forms of heat network.) We have seen District Heating work well elsewhere, and we remain supportive of an option that *can* bring substantial reductions in both carbon emissions and poverty. But it has to be done well.

Based on the Mayor's draft Environment Strategy published last year, FPA were optimistic that the London Plan would bring improvements in the way District Heating was decided on, procured, and funded, and in the development and enforcement of standards to protect both District Heating customers and the environment. We are sadly disappointed. It appears that instead of moving forward, the Plan takes us backwards in a number of respects.

Key among these backward moves are:

1. **District Heating by default** – instead of the promised "hierarchy of energy systems" which was to include CHP systems (Environment Strategy 4.4.4b) as one among several options, we see bald statements like "Major development proposals within Heat Network Priority Areas should have a communal heating system" (SI3D). The Heat Network Priority Areas cover most of London and almost all of Inner London, on the basis that the "heat density is sufficient for heat networks to provide a competitive solution". This density does not necessarily mean that heat networks are the *best* solution for a specific site, and the London Plan does not ensure that they must be that.
    1. There is no definition of "competitive" which would include the long-term interests of customers.
    2. There is no indication that costs to consumers in tariffs, standing charges, and in some cases capital levies, will be measured accurately and using a realistic comparator with gas boilers, and then fully taken into account

    3. There is no definition of “competitive” which would include the potential costs of DH to air quality or even greenhouse gas emissions, taking account of the fact that energy need should be dramatically increasing under a strategy that begins with being “lean”. Using less energy precedes using cleaner energy in the energy hierarchy but this is not reflected in the presumption of DH.
    4. There is no requirement for comparison with renewable energy (eg solar or hydrogen gas) which the Plan commits the mayor to considering under SI2, and which may not work well in combination with District Heating.
    5. In fact, the default requirement for DH does not include any conditionality that would protect customers or other London residents. District Heating is assumed; the hierarchy offered in SI3 concerns only the source of fuel.
2. **Consultation and evidence** -- Even in the aftermath of the Grenfell catastrophe, there is not a word about **consulting** local residents, or potential residents, even those who could easily be reached for consultation about heating systems, because they are expecting to move into regenerated homes in the same area they live in now. **If DH is indeed the best solution for most parts of London, it must be possible to make a clear case for it, with evidence, and allow Londoners to choose it**, as they have in Aberdeen, and, indeed, in Cranston Estate in Hackney.
3. **Funding** – we are disappointed to see no mention of the direct investment in partnership with LAs through a District Heating Network Delivery Body proposed in the Environment Strategy (see below, section on Funding).
4. **Developing standards** – In the Environment Strategy you undertook to “*update London’s guidance on design and specifications for heat networks and consumer standards in light of latest standards and feedback from Londoners.”* Perhaps optimistically, we took this as a welcome recognition that Heat Trust standards of service, and CIBSE technical standards are a bare minimum, even where they are currently enforced. Instead, the London Plan asserts that these existing standards “set out principles for good design, specification and operation of networks and can help ensure fairness for customers of heat networks”. There is no longer a word about developing or improving them to ensure that “*design, specification and operation of heat networks are of a high and relevant standard*.”
5. **Enforcing standards** – The Environment Strategy promised very little on the crucial issue of ensuring that standards, and contracts, are not simply disregarded. However, there is growing recognition of the need to prevent bad DH schemes from developing in future: this has been a concern not only of residents and organisations like ourselves, Citizens Advice, and the Consumer Association, but also of the ADE, Ofgem, the CMA, and BEIS. In this context it is very disappointing to see the London Plan ignoring the issue. One potential way forward is licensing of suppliers; this has been put forward by Scottish government, has been suggested by Ofgem as a possibility, and the CMA are considering it. (Scotland and Ofgem footnotes below; CMA from conversation) Licensing of landlords has been effective in enforcing *housing* standards in some boroughs. The appropriate body to move forward on this – and other effective measures – is the GLA.

6. **Whole-area planning** – There is a map, and a guiding intention to produce a “coordinated”, “strategic”, “holistic” plan, with integrated policies that are tangible and concrete. There is a promise (9.3.1) that “the Mayor will work with boroughs, energy companies and major developers to promote the timely and effective development of London’s energy system (energy production, distribution, storage, supply and consumption)”. But in relation to District Heating we see nothing like the detailed commitment to overall planning proposed by, e.g., the Scottish government, or already in place in Europe. As far as we can see, in relation to DH, you do not propose even to take this critical opportunity to provide London-wide information on prices, London-wide standards and enforcement of standards, ways for local authorities to pool expertise and best practice, or a point of recourse for residents or local authorities when things go wrong.
7. **Air quality** – as Londoners, we are all glad to see what appears to be a strong personal commitment to improve London’s air quality. However, the commitment to ensure that DH fits into this imperative appears to have gone round in a loop referring back to the Environment Strategy, which itself referred forward to the London Plan. In practical terms, there appears to be a contradiction between the presumption that DH “should” be installed, and on the other hand the statements on the air quality problems with CHP, which are not expected to be resolved (see below).
8. **Greenhouse gases** -- In the London Plan, the imperative to reduce greenhouse gases is clearly a key motivation for making District Heating a default choice. Yet the evidence is missing which would show that this is always, or even generally, the most effective way to move towards a zero carbon city. Moreover, some crucial protections are missing.
9. **Community energy** -- One of the best ways of ensuring that DH systems have the support of the community, and are properly monitored in action, is for them to be actually run by an accountable community organisation. Community energy is supported in previous London policies (eg the former Mayor’s Sustainable Design and Construction Supplementary Planning Guidance suggests funding through carbon offsets) but as far as we can see, is not mentioned in the London Plan.
10. **Saddest of all is the failure to seize the opportunity** of the London Plan to ensure that District Heating is brought in appropriately and wisely, on a rational, cooperative basis, nd with clear protections for Londoners.

    We hope you will reconsider.

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Last year we compiled evidence and positive proposals in response to your consultation on the environment strategy. Below, we have updated this response with the latest information and with reference to the draft new Plan.

A. LONDONERS' EXPERIENCE OF DISTRICT HEATING

We are in no way opposed to DH in principle, and have in fact supported one estate (Myatts Field South) who were struggling to retain their much-valued “communal” in the face of Lambeth’s determination to install individual gas boilers (now practically complete).

On the other hand, **we have ourselves witnessed very serious and widespread problems**, that are repeated, again and again, leading to a torrent of complaints, and deep frustration that it has not proved possible to get any redress. Problems include frequent and sometimes very prolonged outages, especially but not only in the first few years of a scheme; hot water that runs cold, or never gets hot in the first place; failing remote meter-reading; bills that (for this reason or others) bear no relationship to heat used; appalling customer service; risible or non-existent compensation; buck-passing between contractors; overheating from badly insulated / badly positioned pipes; high tariffs, high standing charges; and for leaseholders, demands for huge capital investments on the grounds that they will save money in the long term -- a long term many will not live to see.

As you know, customers are bound to the supplier for decades, and cannot switch, the industry is currently unregulated and without Ofgem oversight, and the Heat Trust, which is supposed to protect users, has failed to deliver, even for the minority of people whose schemes are participating in it in the first place. Even with the backing of FPA and access to expert and influential bodies from BEIS to the DH industry’s trade body, ADE, it is **very hard to get redress** for the most basic problems.

A major problem for customers is the cost. The recent BEIS survey found a majority of DH users happy with their heating system, and satisfied with the prices they paid, but there were huge variations, with a significant minority paying astronomical costs. In addition we should point out that 38% of the customers surveyed by BEIS did not have individually metered heat, and that those who *did* were less likely to be satisfied with the prices. In our experience many people (not all, but including the most vulnerable customers) highly value the security of knowing they will never go cold, but this is no longer available from new DH systems as metering is obligatory. **We know DH customers who cannot afford to use their heating**, and some have purchased electric heaters as a substitute, while still paying DH standing charges.

In terms of environmental impact we note that

1. **promises made at the time of applying for planning permission are not necessarily kept, or effectively monitored,** and
2. **a number of assumptions that have been made about the alternatives to DH are not necessarily true, even if they were true a few years ago.** The carbon emissions associated with electric power have fallen, changing the equation when compared with gas CHP. Other low-carbon options, eg. solar and heat pumps, have developed, and the price has come down. Meanwhile previous estimates of demand for heat have been shown to be way off the mark if housing even approaches passive house standards. Energy storage also affects peak demand and the need for quickly responsive systems.

We have tried assiduously to access **examples of good practice** in heat networks, including through the Heat Trust and ADE, but with very little to show for it. It has been shown that costs can plummet where DH replaces electric heating, and that it can offer very good value for council tenants where it is subsidised, and we know of suppliers with well-designed, well-run DH schemes designed to produce warmth rather than profits. But we have not seen any coherent evidence that for-profit heat networks can compete with gas on price, or are better than alternatives for the environment and climate. Even if a network is *not much more* expensive than gas boilers, and *nearly* as low carbon as green alternatives, it may prove to be the best way forward, but a case must be made, using honest and careful estimates, without distortion by the financial interests, and appropriate protections for users must be put in place. **At present, if the evidence is out there, it has not been produced, at least not in a form that Londoners can access**.

We were therefore relieved to see that the Environment Strategy appeared to be moving away from the current London Plan's requirement to install DH as a default, and looked forward to the new London Plan moving instead towards a "hierarchy of energy systems" which would weigh up a series of different factors in each case. As laid out in our point 2 above, these hopes have been disappointed. **We still believe some basic principles are essential, including the following:**

1. A thoroughly researched and publicly debated **case must be made** for DH in general and in specific situations where it is to be installed, comparing it to alternatives in relation to carbon emissions, air quality, reliability, overheating, use of space, and costs, present and future, including realistic provision for conversion to fossil free energy sources. Given what so many people have experienced, **it is not reasonable to expect Londoners to embrace, live with, and pay for, technology for which no convincing evidence or argument has yet been presented.** Any such argument should be open to robust challenge and debate, to avoid a situation where a case is made on faulty information (e.g. see below, Section F, re Redbrick Estate). The same, of course, should apply to other technologies, including gas boilers and electric heating.
2. Prospective tenants, leaseholders, and freeholders should be made fully aware of the nature of the system they are intending to move into, and its costs, including future costs. In cases of redevelopment or refurbishment, existing tenants should be given an opportunity to make **an informed choice** about the heating system for their estate.
3. Any heat networks approved from now on should be based on **renewable energy sources**, or at least designed to be convertible to renewable energy; this includes the pipes and the appliances in homes.

4. We are glad that following persistent representations from ourselves, and two meetings to discuss the possibility of a survey of Myatts Field North DH users, and then how best to reach customers and structure questions in a **London-wide survey** instead, a Communal Heating Consumer Survey has now been done. The data was due to be analysed in November 2017. We look forward to the results, and hope it will be possible to distinguish between new and old heat networks, and to highlight what the factors may be that cause positive or negative responses.

B. GREENHOUSE GASES AND DISTRICT HEATING

Not only is the case not made out for District Heating in the light of highly energy efficient housing, and the development of other technologies, but there is little detail on how a) decisions will be made on schemes to ensure it is the best option or on b) how promised carbon savings will be monitored and enforced. We assume the Annual Energy Monitoring reports will continue under the new Plan, and are glad to see the statement in SI2 that "The move towards zero-carbon development requires comprehensive **monitoring of energy demand and carbon emissions** to ensure that planning commitments are being delivered." But despite the Annual Energy Monitoriing reports and all the official requirements, we have seen how in practice monitoring can be absent unless done by residents themselves, who then have no power to get their objections acted on.

As well as monitoring, effective **sanctions** are critical (see below).

C. AIR QUALITY AND DISTRICT HEATING

Paragraph SI3D says, ". . . in areas where legal air quality limits are exceeded all development proposals must provide evidence to show that any emissions related to energy generation will be equivalent or lower than those of an ultra-low NOx gas boiler . . . CHP and ultra-low NOx gas boiler communal or district heating systems should be designed to ensure that there is no significant impact on local air quality. Para 9.3.6 says "However, it is not expected that gas engine CHP will be able to meet the standards required within areas exceeding air quality limits with the technology that is currently available."

This clearly calls into question a commitment to install District Heating on a massive scale. We appreciate your statement (Mayor's Question Time 18 January 2018) that "The use of gas engine CHP is expected to be more limited over time under the proposed policies in the new London Plan which now take a more integrated approach to tackling air quality and carbon reduction. The decarbonisation of the grid, and the change in the relative carbon content of electricity and gas, will also mean that other cleaner CHP technologies that optimise local energy sources, can increasingly serve as the heating source for district heating, offsetting more carbon emissions than traditional systems such as gas engine CHP." **But the question remains: are you therefore confident that DH which is NOT based on gas CHPs is viable in most of London? Or that the technology for CHP will dramatically improve? And if neither of these are even likely, how can DH be the default heating system of choice for most of London?**

As noted above, this is one area where the London Plan appears to have gone backwards from the Environment Strategy, or at least gone round in a loop. The Environment Strategy 4.3.3b as below refers forwards to the London Plan, saying THAT will consider whether to prevent emissions from CHP, and will consider relevant emission standards and (by implication) will develop a CHP register including information on air quality. But now the London Plan refers back to the Environment Strategy, saying THAT has the details. Meanwhile the London Plan's section on Air Quality (Section SI1) refers in passing to the "provision of low or zero-emission heating and energy", but says nothing else about heat and doesn't mention CHP.

The Environment Strategy on this issue (at 4.3.3b) is worth quoting at length:

Through the new London Plan, the Mayor will consider new policies on heat and power provision to make sure CO2 and pollution targets are achieved in a coordinated way with no air quality disbenefits The Mayor has set ambitious long-term targets to both reduce harmful pollution emissions and to become a zero carbon city. In the past, some policies have had the result of addressing one of these issues to the detriment of the other. The Mayor's energy policies will take a holistic approach to overall emissions while ensuring no air quality disbenefits. Through the London Plan the Mayor will consider a ***hierarchy for energy systems*** *that contributes towards improving air quality. In particular, while combined heat and power systems (CHP) can have benefits in terms of carbon emissions, gas engine CHP plant usually gives rise to higher emissions of NOx and/or PM10 emissions than ultra-low NOx gas boilers, even when abatement equipment is used.*

Therefore in preparing his London Plan, the Mayor will ***consider whether,*** *in areas which exceed legal air quality limits,* ***the policy should prevent emissions from energy production plant, including from CHP****, that would exceed those of an ultralow NOx gas boiler. Energy production plant used in other areas should meet all relevant emission standards (which may require abatement equipment) as considered by the new London Plan, as well as not causing unacceptable local impacts on air quality. To better understand the pollution impact of existing CHP systems in London the Mayor will develop* ***a new CHP register*** *which will be reflected in future versions of the London Atmospheric Emissions Inventory.* (emphasis ours)

Unless we've missed it, there appears to be no sign of the expected registry or other progress, and no clear repetition of the commitment to assess air quality implications before committing to CHPs, either in general or in specific places. Instead, we have the contradictory statements quoted at the start of this point. If the Mayor has indeed "consider[ed] whether . . . the policy should prevent emissions from . . . CHP that would exceed those of an ultralow NOx gas boiler" he appears to have decided that the policy should *not* prevent this. That may not be the intention, but on this issue the Plan is unacceptably confusing.

D. ENFORCING STANDARDS IN DISTRICT HEATING

Accountability

We are most concerned about a likely **gap between intention and what will be implemented** in practice.

In terms of carbon emissions, it is all too easy for developers, Energy Service Companies (ESCOs) and social housing providers, to promise energy efficiency, low-carbon affordable heating systems, and renewable generation (solar panels, biomass boilers) which simply fail to materialise or are installed but never work, with no repercussions or even effective monitoring. Please see examples below.

In terms of both carbon and other emissions, and reliability, cost and service standards, accountability is only possible with **stringent monitoring** of outcomes in practice, and **effective sanctions** or other repercussions if promises are not met.

The Environment Strategy says, "*The Mayor will encourage industry to ensure that heat networks that are developed in London are of the highest standards so they operate efficiently, effectively and reliably once in operation.*" Bitter experience so far has shown that "encouragement" is not enough. Systems should be subject to robust monitoring from planning stage onwards to ensure that promises are kept to and systems function as they should, with punitive sanctions and recompense for those who suffer when this is not the case.

Compensation – payable to *end users* – must be sufficient to function as an effective deterrent to badly designed and run heat networks, and to properly compensate residents including for outages of less than 12 hours, which are now excluded from compensation under Heat Trust rules even when they are repeated again and again. If you can never rely on your heating or hot water, the system is not fulfilling its purpose, even if the outages are relatively short.

Four Hyde Housing blocks in Stockwell were without heat or hot water for a week in very cold weather in November 2017; the same communal gas boilers also failed in October 2016, and, for 11 days in October 2015, but any repairs clearly failed to deal with the problem. While Hyde said residents were offered electric heating and would be reimbursed for any extra electricity costs, reimbursement does not help those who cannot cover their costs at the time, nor can people count on promises.

This estate is just a walk away from Myatts Field North, where, as residents have repeatedly told GLA representatives in person, people have been left without heating and/or hot water for periods of weeks or even months - documented in the report Not Fit for Purpose published last year.

Meanwhile residents in Pembroke Park, Hillingdon, suffered five years with a non-functional boiler, leading to constant outages of heat and hot water, even while they were paying an average of £80 a month. The boiler issue is a legacy of a biomass boiler having been installed for the purpose of planning permission which never worked and was probably not intended to; A2Dominion, which is both the ESCO and the HA, switched to a back-up boiler that was also inadequate. Other issues include unjustifiable bills and back billing, lack of insulation, and more.

Residents of Orchard Village, Havering, have suffered frequent outages and extremely high heating costs, along with damp, mould, lack of insulation, fire risks, leaking methane, and other outrages and have been struggling to hold anyone to account for the disastrous construction and management of their new built estate.

These are just a few examples which prove that encouragement, assurances, and self-regulation simply do not work.

The **Heat Trust**, unfortunately, is regarded with scorn by most DH customers who are covered by it -- and know about it. The Competition and Markets Authority (CMA) has specifically banned the Heat Trust from intervening on questions of price or length of contract, on the grounds that this would be “uncompetitive”. They do not appear to see it as uncompetitive that commercial companies have 20 to 80 year monopolies to supply a whole neighbourhood. The Heat Trust has had a role in setting out -- on paper at least -- some minimal principles, which would prevent some of the worst abuses that go unchecked in non-Heat Trust schemes. However, even where the Heat Trust does intervene to enforce these principles, it has proved singularly ineffective.

Myatts Field North is a Heat Trust scheme, run by E.ON, which is a leading member. Yet compensation, even at the minimal levels laid down in accordance with Heat Trust rules, has had to be fought for, to the extent of going to court. Finally, after residents went straight to BEIS, and took part in an hour long BBC radio expose, the Heat Trust made this network one of the first to be audited: the only form of sanction it possesses. The audit was begun last spring, and according to the rules, the independent auditors should have reported within 40 days of the last site visit, when they interviewed residents on 17 August 2017. But residents have been told that when the report is finally done, the Heat Trust will discuss with the ESCO, E.ON, what parts of the findings they will be allowed to see. Even that has not happened, and the BBC has now been told that this was not a real audit, but only a “pilot”. We hope the GLA will set up systems of accountability that are not a sham.

While residents must be fully consulted at every stage, they cannot be expected to carry responsibility for ensuring that standards are enforced - especially but not only because they are not even listened to. In Myatts Field monitoring is supposed to be carried out by the Myatts Field North Residents Association and PFI Monitoring Board (MFN RAMB), a conglomerate of residents, local authority, and estate management/construction firms that is totally ill-equipped for this responsibility. The result is huge pressure on hard pressed volunteer residents, attempting to confront a multinational corporation.

Residents must overcome divisions between on the one hand people in social housing, often on very low incomes, and on the other hand, people who were well enough off to find a deposit for a London home – but who may still struggle each month to cover a massive, and unplanned-for heat service charge on top of their mortgage (”I knew nothing of the heat charge until I read the welcome pack they left on my kitchen worktop”).

The divisions between residents are often compounded by the **number of contractors** involved: in construction, in management, in repairs, in heat production and the primary network, etc., with a multitude of opportunities for buck-passing and inaction, and no one taking overall responsibility.

E. LONDON-WIDE COOPERATION AND A COMMON CODE OF PRACTICE

We are painfully aware that the GLA's powers to get better standards adopted may be limited. However, you do have power over the planning and development phases of DH, and many of the same developers will want to come back to you next time. We have consistently put forward to BEIS and to others, including yourselves, the principle that public or private bodies will **not be awarded contracts, or funding, planning permission, or other support, if they have failed to deliver** in heat networks for which they are already responsible.

While you may be able to ensure that future contracts include effective monitoring and sanctions, there will be a legacy of heat networks established before such improvements are made. **For existing DH customers, the GLA should provide a back-up guarantee** that outstanding problems from the current wild-west period of DH development will be dealt with, and they will not be left to pay the price of mistakes (or profiteering) for which they are not responsible. If only a minority of DH schemes are problematic, then this will not be too great a burden. A report by CBx – researchers and advisers in partnership with UCL Energy Institute – recommends "financial support for energy audits of underperforming networks, to identify cost effective modifications".

We note that in relation to acting against private sector landlords who rent out cold damp homes, you have explored the possibilities and limitations of GLA intervention, and how you can work with Local Authorities to do this; **we hope that you will look into these questions in relation to the (often public sector) landlords and ESCOs who run DH**. This does not appear to have been done, so far.

Local Authorities do not often have the necessary experience, know-how, or resources to get a good deal from the private companies that design, install, and run heat networks, or to monitor them in operation and enforce contracts. Some are more committed than others to getting and enforcing a good deal for their residents (and protecting their own investment). They may altogether reject responsibility for customers who are not their own tenants but leaseholders or part-owners who have bought homes in a development whose heat comes from a scheme which they commissioned.

Another factor leading to malfunctioning and expensive heat networks is the practice of developers expecting **capital contributions** from ESCOs bidding for a contract. The sums involved are large, and are recovered from end users, contributing very significantly to the cost of heat. The ESCO has no incentive to keep the contributions down. This perverse system, which to users looks like bribery at their expense, has recently been challenged by Heat Trust chair Casey Cole.

The costs of **metering and billing** are also a high and disproportionate part of customers' bills - despite the fact that, as the only parts of the system now subject to regulation, they are nevertheless often disastrously administered. (Many people have questioned why this part of a DH system should be a monopoly.)

We therefore believe that the GLA should

1. **Explore co-operation with and between local authorities**, as you plan to do in relation to private sector energy efficiency. This would include facilitating and encouraging exchange of experience and expertise between boroughs, and ensuring that those boroughs whose residents have been unprotected understand the need to bring their practice up to the standard of boroughs who have had engaged and consumer-focused District Heating advocates. Training should also be offered.
2. Where it cannot be satisfactorily achieved at a local level, itself **take on inspection and monitoring** of heat networks
3. **Give residents access to a fully funded and responsive body that will address their complaints,** and either fix the problem (permanently, not again and again) or ensure that those responsible for it do so.
4. Set up a unit as **supplier of last resort** to take over badly functioning schemes if an Energy Service Company is not performing in the interests of its customers

We would also suggest that the GLA ensure that any scheme it promotes, or as far as possible, any scheme brought in with the support of a local authority must

1. **have clear lines of responsibility** with one named overall responsible body, regular reporting, and effective complaints procedures, compensation, and sanctions.
2. offer **active support for customers** – eg meeting space, independent advice, secretarial support with minute-taking, recording of problems, etc., as requested, for residents' organisations.
3. have a **clean track record**. No company or public body should be allowed to be involved in commissioning, building or operating any new network until they have dealt with any significant outstanding complaints about networks they have already been involved in. As Lambeth councillor Jacqui Dyer, explained to BEIS, there are vulnerable people at risk here – there should be a DBS service with disclosure and barring of anyone whose track record is bad, before they are considered for public support.
4. ensure that **effective and deterrent compensation to end users** is a part of any contract made with GLA support.
5. dispense with the practice of developers being paid **capital contributions** by ESCOs as a way of securing the contract.

To establish consistent standards across the city, we would also propose a London Code of Practice which developers/ESCOs could be required to sign up to.

There is increasing discussion of a licensing system, which is being put forward as part of a cohesive DH strategy the Scottish government. Ofgem and the CMA are considering it. Licensing been effective in enforcing *housing* standards in some boroughs. Among other things it could be one way to ensure that prospective suppliers take effective action to rescue the human guinea pigs who are locked in their previous failed schemes.

These existing District Heating users with the misfortune to be contracted into dysfunctional heat networks are in danger of being left behind by later improvements. Where there is no effective lever (like a licence for further contracts) that will force developers or ESCOs to put them right, we believe the GLA itself should take action. Experience has shown that bringing in engineers who know what they are doing, combined with smart technology and a will to improve, can lead to heat costs in such schemes being halved. It was, after all, on the basis of GLA requirements that many of these schemes came into being in the first place. The effect on people's lives is unacceptable, and will make it much harder for Londoners to welcome a roll out of DH on a large scale across the city.

F. FUNDING OF DISTRICT HEATING

As noted above, we are disappointed that you appear to have backed away from the plan to "*have a more direct role in the delivery of heat networks . . . . [and] consider the establishment of a District Heating Network Delivery Body for London that secures funding, and in partnership with London Boroughs, develops and builds district heating networks.*

The Environment Strategy states that, *"For such a model to work it is likely that central government will need to create a level playing field for the treatment of district heating networks compared to other statutory utilities regarding access rights and business rates."* This would certainly be desirable, but even in its absence we cannot see how it can be preferable for funding to be so heavily reliant on the private sector (with some central government subsidy).

The establishment of a delivery body for DH could be a major step forward. As stated above, we believe a robust case must always be made for DH, as opposed to pursuing a general goal of increasing the rate of DH development in London. However, where that case *is* made, **direct GLA involvement could make all the difference for residents**. Many of the problems cited above would not even arise if the supplier were an arm of the GLA itself. Direct involvement could potentially address the lack of suitably qualified engineers, the perverse incentives built into present procuring processes, the need for a quick and very high **return on capital investment**, at far beyond the rates required by local government, and more. The GLA could also potentially be far more accountable than the ESCOs and Housing Associations that residents are struggling with now.

This could also be a role, ultimately, for a **fully licensed public energy company for London**.

PFI funding provided a quick fix and complied with central government policy but has proved disastrous for hospitals and other public services. In the same way, concessions handing control to private companies to design, build and/or operate heat networks for profit can help to get these networks in operation – only to become a millstone round the neck of this and future generations. If organised by energy cooperatives, or municipally, or as a matter of social policy, as in Europe, heat networks could be less dependent on private companies which may need to secure a 15% return on capital within a short space of time. **We do not believe that, by their nature, heat networks must be the burden on their customers that many of them now are.**

Ofgem, which has no powers over heat networks, has spoken up to acknowledge the case for “a more comprehensive approach to ensuring customer protection”, which as they say is “appropriate for an essential service”, and has suggested not only regulation but new arrangements to cover charges and funding. Proposals put forward in an editorial in the November 2016 District Energy Vanguards Letter include municipal or community ownership, and highlight the need for a major rethink at both national and municipal level. (The ADE Task Force which reported in February 2018 proposes, instead, that public money underwrite private investors' risks, in exchange for some basic consumer safeguards.)

Heat networks are expensive, and under the present system of financing them, so is the heat they produce for their customers. A network may be more efficient than individual gas boilers, but there is also the initial investment to pay back. With investors typically expecting to make back their investment in something like 25 years, and with a limited number of customers, it is hard to see how prices could compare with prices for gas, where the pipes and other infrastructure were laid down and paid for decades ago, and where costs are spread among far more customers.

Residents of DH estates, who are and will remain for some time a small minority of London residents, **should not be expected to fund from their own pockets a major infrastructure project:** the energy centre and very expensive, highly insulated underground pipework required by DH. At present, leaseholders and to a lesser extent tenants are expected to cover capital expenditure through standing charges, tariffs, and sometimes large investments in replacement systems - and to cover these costs at commercial borrowing rates. There may well be compelling and overriding environmental reasons for a national, or London-wide, commitment to new infrastructure. But the cost should not fall arbitrarily on the shoulders of a small pool of users. Residents of regenerated estates – often present or previous council tenants – do not see why they should pay more than other Londoners for a carbon saving policy that does not personally, specifically, benefit them – and in fact often leaves them with a worse service.

There are two ways in which this is happening now: through tariffs and standing charges, and through large capital sums demanded from leaseholders to renew or replace old equipment or pipes. In both cases customers are faced with justifications which on closer inspection turn out to be based on distortions.

Tariffs and standing charges are anything but transparent, with much confusion over standing charges, service charges, and who is responsible for what repairs. Claims by the Heat Trust and participating operators that DH will not cost more than than “the counterfactual”, which at the cheapest, means gas boilers, appear to have been dropped. Instead, the Heat Trust “comparator” simply informs customers of how their costs might compare with an alternative form of heating in their building, offering no way to do anything about it. Moreover, the way the comparison is set up leaves customers confused and then furious, when they find comparisons are based on them buying and running a boiler far bigger than their needs, or insurance that they would not need with a new appliance, or would not, if they are tenants, be expected to pay for at all.

Unlike gas or electric customers, who are bombarded with offers to compare prices, DH customers have no access at all to comparisons with prices in other heat networks. Not only are they unable to switch, but this lack of transparency makes it much harder to press for fairer bills.

For leaseholders, standing charges may be set at a level that would be relevant to their mortgage calculations -- **if they knew about them at time of purchase.** They rarely do. Instead, they may see -- or miss -- small print informing them that there is a heat network in operation, and that this will be clean and economical.

Large capital sums may be demanded of leaseholders when a network needs major refurbishment or replacement. Few home buyers are aware that as well as expected potential costs for eg a new roof, which they may figure in when buying a property, in DH estates they may also receive a sudden demand for tens of thousands of pounds, to be paid upfront.

In **Southwark** a resident of one small estate recently took a case to first tier tribunal against the local authority, who were trying to impose on leaseholders major improvements to their heat network at a cost of £25,000 per flat, on top of the weekly cost of £12/week for a two bed flat. The old system was based on hot air being blown into living rooms. The new system is based on new thermal stores, in a new cupboard in each flat - a surprising choice and an expensive one, more normal for large multi-person homes requiring a big store of hot water. Apparently the system breaks down about once a month, and homes are unbearably hot in the summer.

In Redbrick estate, **Islington,** on Christmas eve 2015, residents were told that they would have to pay for a new communal heating system. The estimated bill that followed came to £22,000, payable within five years; or a maximum of ten years with additional interest. The cost is to pay for **replacement and improvement** to a network connected to the flagship Bunhill scheme, using waste heat from the London Underground. However exciting this development may be (and it is) the reality for Redbrick is that they must still pay for conventional CHP communal boilers to meet peak demand, and for the completely unnecessary replacement of the whole heating systems within their flats. Islington Council maintains that residents will have access to low cost heat, and that the investment will pay for itself in 10 years, while the real figure appears to be over more than 30 years, if at all.

Residents say that many of them **simply do not have that kind of money**. Many are elderly and will never live to see the benefits. Nor would they recoup the money if they sold the flat. Critically, it represents an appalling capital investment: if £22,000 were invested elsewhere, even the interest would cover their heating costs. Investment in Islington's scheme gives a return less than the rate of inflation, costing leaseholders far more money than it saves. The upfront cost to residents is more than five times the amount they would expect to pay for a gas boiler equivalent, which would be cheaper even factoring in maintenance and replacement after 10-15 years.

Residents ask why such projects should not be **financed through government borrowing and then paid off over the lifetime of the system via the service charge, with interest charged at government borrowing rates**. They say the interest would add to the cost, but this would be more than offset by the advantages of spreading the cost, removing the burden of up front capital costs on pensioners.

Crucially, the Redbrick residents **cannot rely on the figures they are offered** -- even the gas boiler running costs presented by the Council as a way to show that DH works out cheaper. The council says they would have to buy gas at 4.7p/kWh, while it is actually sold by Islington Council itself, through Angelic Energy, at 2.86p/kWh.

This is exactly the kind of misrepresentation that the GLA must avoid, in “promoting District Heating”, and indeed in assessing decentralised energy (DE) in general. You say that with DE “Londoners’ bills will be 40% lower”, according to a Mayor’s assessment. This would clearly be a major gain against fuel poverty -- but it is hard for Londoners to count on such figures when so much misinformation is allowed to influence policy.

It cannot be good practice for officers in local government or, eg, housing associations, to volunteer other Londoners for investments in the climate that they would not be prepared to make themselves.

Therefore, we believe

1. **The GLA should establish a website showing all DH networks in London including data on tariffs and standing charges of different heat networks in London,** working with the Heat Trust members and other private sector DH networks to see if they will publish their tariffs. It would be invaluable for customers to be able to compare what they are paying with district heating prices elsewhere. If District Heating Operators refuse to provide such details it should be obtained from social housing landlords and further research. The **London Plan should require all new networks to publish their tariffs on this new website.**
2. Cost and price comparisons should be **scrutinised by informed and independent bodies** (eg LETI) which are not themselves involved in negotiating contracts.
3. The GLA should **actively pursue the proposal to directly fund DH,** if it is found to be cost-effective, or potentially, to provide **mechanisms where parts of a network (eg the pipes) are funded** with loans at government rates and time-scales.
4. Borrowing to finance DH projects should be done at **government rates**, and paid off over the lifetime of the system. A fund to which District Heating Operators could apply for this purpose could be linked to the DH Network Delivery Body.
5. The GLA should support (financially and with expertise) the establishment of **community-controlled heat networks** where these are the choice of the community.

2. A Public Energy Company for London

1. FPA stands with Switched On London, the Green Party, and others, in criticising the Mayor's decision not to go for a fully licensed publicly owned energy company. Using an existing company, which we understand is planned to be a public energy company, will reduce **accountability** to Londoners. Any revenue generated from selling energy will **not be captured** by London authorities, money that could be reinvested back into community energy projects or collected in a community energy fund. It prevents the decisions of the company - for instance about how to balance, or *integrate* the twin goals of reducing bills and carbon emissions - being decided in a **democratic and communal** manner, which would give people a genuine say and a genuine stake in how London's energy develops.
2. Rather than outsourcing our energy supply needs to another municipality's energy supply company, which may not have the administrative capacity to handle the energy demands of London, FPA urges the GLA to recognise the successes of municipally owned and run energy companies across Europe. Nottingham's Robin Hood Energy, for example, has cut fuel poverty by offering tariffs that are **£200 below** those of the Big Six, whilst reinvesting any revenues generated back into Nottingham. These tariffs are not available beyond Nottingham, and nor would Bristol's lower tariffs for fuel-poor customers be available to Londoners. Moreover, both Nottingham and Bristol have failed to commit to investing in renewable energy and maintaining a communally democratic and accountable energy company. FPA sees this gap as an opportunity for the GLA to lead by example, creating a community energy company that is run for and by Londoners, that is properly accountable to them, and that reinvests in and buys clean energy.
3. The argument that a piggyback company can be achieved more quickly and "enable Londoners to have fairer energy bills sooner" seems to us specious and out of touch with the scale of change that is needed to achieve your stated goals. Many Londoners we've spoken to were really excited about the idea of a publicly owned London company and will derive little comfort from your statement that "The option to move to a fully licensed supply company will be kept under review". There should, at the very least, be a clear stated intention to convert your proposed arrangement to a genuine London-based company within a clear time-frame.

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3. The Community Energy Fund

1. Community energy is supported in previous London policies (eg the former Mayor's Sustainable Design and Construction Supplementary Planning Guidance suggests funding through carbon offsets) but as far as we can see, is not mentioned in the London Plan. The current London Plan (2016) includes a commitment for the Mayor and Boroughs to "encourage community-led initiatives for renewables and low carbon energy and examine how they can be supported through neighbourhood planning". This appears to be missing in the new London Plan.
2. Provisions could be made specifically for Tenants Associations of social housing estates to be prioritised to access funding for capital costs, with the help of bodies like Community Energy London to see them through the delivery process.
3. One of the best ways of ensuring that DH or other heating systems have the support of the community, and are properly monitored in action, is for them to be actually run by an accountable community organisation.
4. The Community Energy Fund whilst a step in the right direction, is limited by its funding only being allocated to the development phase of a community energy project. The fund does not go far enough in aiding communities with the capital costs of investing in energy systems. Some of these costs could be recouped by using the License Lite programme to support community energy projects to secure a better export price for their electricity sales, and by using the 'reverse auctions' process, but there is a significant financial barrier in place that prevents relatively financially poor communities from buying the energy systems themselves.
5. GLA programmes like RE:FIT, RE:NEW, the (Mayor's Energy Efficiency Fund), and DEEP should all support community energy activity.

User: Levitt Bernstein

- Edit the heating hierarchy by:
  - Swapping clauses a. and b. and re-phrasing to include energy sharing and efficiency measures. Also only ask applicants to connect to local heat networks where they are working efficiently, the cost of heat to occupants is reasonable, and there is a zero emissions transition plan in place.
  - Merging clauses c. and d. do that zero emission sources are preferred.
  - Merging clauses e. and f. for the use of CHP and gas boilers. CHP should only be used where it is suitable for the size and demand of the development. CHP or gas boilers should only be used where there is a zero emissions transition plan in place.

- Therefore the policy should read as follows:

D. Major development proposals within Heat Network Priority Areas should have a communal heating system.

1) the heat source for the communal heating system should be selected in accordance with the following low carbon heating hierarchy:

a. connect to an energy sharing network through the capturing and using of waste heat and/or use of available local secondary heat sources.

b. connect to a local existing or planned heat network where it is demonstrated to be running efficiently, the cost of heat to occupants is comparable to national average heating fuel costs, and there is a zero emissions transition plan in place to ensure that the development achieves zero carbon emissions in operation (if it is not already fossil fuel free).

c. generate clean heat and/or power from zero-emission sources (examples include: solar technologies, heat pumps and energy storage powered by renewables).

d. use low emission combined heat and power (CHP) (where suitable for size and demand of development) or ultra-low NOx gas boilers (in areas where legal air quality limits are exceeded all development proposals must provide evidence to show that any emissions related to energy generation will be equivalent or lower than those of an ultra-low NOx gas boiler). If the development uses fossil fuels then a zero emissions transition plan must be in place to ensure that the development achieves zero carbon emissions in operation by 2030.

User:	Mrs Marilyn Mason

We support an increase in renewable energy sources both in new developments and retrofitted in older buildings . Solar photovoltaics and solar thermal are our preferred renewables as they are clean, unobstrusiv, and very efficient in the right place. There are limited sites in London suitable for wind and hydropower, and though equally clean and renewable, they do provoke much more opposition mainly on aesthetic grounds. .

User: Agriemach Ltd

3rd Januaury 2018

Dear Mr Khan,

I would like to start by introducing Agriemach Ltd, we are a leading UK company in the emission treatment field, specialising in SCR technology for Nitrogen (NOx) reduction. We are still a family run business having been established in 1976 and we have been leading the market in emmissions and exhaust filtration sine the early 1990's.

I would like to start by congratulating you and your offices' stance on pollutiopn and in particular your drive to improve air quality. Which will lead to the saving of thousands of Londoners lives in the future!

With that in mind. I have just read the 'Draft New London Plan' and in particular, point:

"9.3.6 Further information about the relevance of CHP in developments of various scales will also be provided in the Energy Planning Guidance document, which will be kept updated as technology changes. However, it is not expected that gas engine CHP will be able to meet the standardfs required within areas exeeding air quality limits with the technology that is currently available."

I'd like to draw your attention to the enclosed information regarding our SCR systems for exactly this type of application. We currently have numerous installations in and around London reducing the NOx emissions of Gas CHP engines, down to as low as 15mg NOx / Nm3 @ 5% O2!

We would like to invite you to a current installation, where we would gladly demonstrate the technology and explain our solution going forward to meet the 'New London Plan'.

We do find it slightly worrying that the draft document mentions "not expected that gas engine CHP will be able to meet the standards required" when we have working installations doing exactly that.

If someone from your office would like to discuss any of the above or our technology and what we can achieve in more detail, we would be only to happy to speak with them.

Your sincerely

Mr Simon Nicholls Bsc (Hons)

Agriemach Ltd

User: Mr Dave Colling

The London Plan proposals should acknowledge the pioneering contribution already made toward carbon neutrality by existing installed residential solar installations and offer planning guidance which protects their power and heat generation by proposing refusal of developments which would result in loss of generating or heating capacity through loss of sunlight and /or overshadowing. This is especially important given the other proposals in the plan for intensification through increased building height in large parts of London

Solar installations need some form of planning protection, otherwise the incentive to install (and thus contribute toward carbon neutrality) will be diminished and ultimately lost.

User:	Agriemach Ltd
Full comment see attached	

User:	MR Ian Pirie
Solar panels should be supported. Supporting text in 9.2.3 should be moved into Policy S13	

User: Cory Riverside Energy

Support.

Recommended amendments:

The inclusion of the word “possibly” in Policy B4 creates unnecessary ambiguity and weakens the policy. Policy B4 should remove the word “possibly” and be read as:

“opportunities for energy from waste”

Policy SI3 is positively worded and appears sufficiently robust to achieve the Mayor’s ambitious vision on decentralised energy infrastructure development across London. Policy SI3 is consistent with national policy[1] in that it recognises the role of waste management infrastructure within communities, providing a potential heat source. Cory welcome explicit acknowledgement – in Policy B4 and Section 9.3.7 – of the positive role energy from waste (EfW) has to play in meeting London's waste management and energy needs. Energy generated from waste will typically be between 40% and 100% renewable and will therefore provide reliable, low carbon base-load power to the UK market[2]. EfW also delivers secondary materials through the recovered metals and aggregates, thus avoiding use of virgin materials and sustaining new markets for secondary materials.

For Policy SI3 to be a success, and enable EfW with combined heat and power (CHP), a joined up and integrated approach to planning, energy and housing policy is required. Only this can realise the great potential to utilise the heat generated at EfW plants, creating a more productive energy system for Londoners, that is lower cost and lower carbon[3].

Though Policy SI3 outlines a positive policy framework, unless the GLA can help deliver the associated heat network infrastructure and bring the heat to customers in the right place, most EfW plants will remain “CHP ready”, but nonetheless operate in electricity-only mode. The Mayor, in conjunction with local authorities needs to be more active in developing and funding opportunities for district heat networks through: co-ordination of opportunities in local planning processes; funding heat mapping projects to aid local planning processes; and if the Mayor is truly serious about connecting EfW plants to heat users, funding for district heating schemes will be required. We suggest that stakeholder consultation on the GLA’s Energy Planning Guidance[4] is sought, to allow industry to share views on how best to ensure that EfW retains an appropriate and equally ambitious role in sustainable infrastructure development throughout London.

[1] Defra. Energy from waste: a guide to the debate. See here:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/284612/pb14130-energy-waste-201402.pdf

[2] Suez. Mind the gap 2017 – 2030. 2017. See here:

http://www.sita.co.uk/wp-content/uploads/2017/09/MindTheGap20172030-1709-web.pdf

[3] Association for Decentralised Energy (ADE). Shared Warmth. February 2018. See here

https://www.theade.co.uk/

[4] GLA. Energy Planning Guidance. See here

https://www.london.gov.uk/sites/default/files/gla_energy_planning_guidance_-_march_2016_for_web.pdf

User: UK Green Building Council

SI 3

D

Swap clauses a. and b. and re-phrase to include energy sharing and efficiency measures.

Merge clauses c. and d.

Merge clauses e. and f. and re-phrase.

Proposed wording:

D. Major development proposals within Heat Network Priority Areas should have a communal heating system.

1) the heat source for the communal heating system should be selected in accordance with the following low carbon heating hierarchy:

b) connect to an energy sharing network through the capturing and using of waste heat and/or use of available local secondary heat sources. ?

c) connect to a local existing or planned heat network where it is demonstrated to be running efficiently, the cost of heat to occupants is comparable to national average heating fuel costs, and there is a zero emissions transition plan in place to ensure that the development achieves zero carbon emissions in operation (if it is not already fossil fuel free). ?

d) generate clean heat and/or power from zero-emission sources (examples include: solar technologies, heat pumps and energy storage powered by renewables). ?

e) use low emission combined heat and power (CHP) (where suitable for size and demand of development)?or ultra-low NOx gas boilers (in areas where legal air quality limits are exceeded all development proposals must provide evidence to show that any emissions related to energy generation will be equivalent or lower than those of an ultra-low NOx gas boiler). If the development uses fossil fuels then a zero emissions transition plan must be in place to ensure that the development achieves zero carbon emissions in operation by 2030. ?

User: London Sustainability Exchange

Policy SI3 Energy Infrastructure

1. Boroughs and developers should engage at an early stage with relevant energy companies and bodies to establish the future energy requirements and infrastructure arising from large-scale development proposals such as Opportunity Areas, Town Centres, other growth areas or clusters of significant new development.
2. Energy masterplans should be developed for ~~large scale~~ all development locations which establish the most effective energy supply options. Energy masterplans should identify:
    1. major heat loads (including anchor heat loads, with particular reference to sites such as universities, hospitals and social housing)
    2. heat loads from existing buildings that can be connected to future phases of a heat network
    3. major heat supply plant
    4. possible opportunities to utilise energy from waste
    5. secondary heat sources
    6. opportunities for low temperature heat networks
    7. possible land for energy centres and/or energy storage
    8. possible heating and cooling network routes
    9. opportunities for futureproofing utility infrastructure networks to minimise the impact from road works
    10. adequate infrastructure and land requirements for electricity and gas supplies
    11. Implementation options for delivering feasible projects, considering issues of procurement, funding and risk, and the role of the public sector.
3. Development Plans should:
    1. identify the need for, and suitable sites for, any necessary energy infrastructure requirements including upgrades to existing infrastructure
    2. identify existing heating and cooling networks and opportunities for expanding existing networks and establishing new networks.
4. Major development proposals within Heat Network Priority Areas should have a communal heating system
    1. the heat source for the communal heating system should be selected in accordance with the following heating hierarchy:
        1. connect to local existing or planned heat networks

    2. use available local secondary heat sources (in conjunction with heat pump, if required, and a lower temperature heating system)
    3. generate clean heat and/or power from zero-emission sources
    4. use fuel cells (if using natural gas in areas where legal air quality limits are exceeded all development proposals must provide evidence to show that any emissions related to energy generation will be equivalent or lower than those of an ultra-low NOx gas boiler)
    5. use low emission combined heat and power (CHP) (in areas where legal air quality limits are exceeded all development proposals must provide evidence to show that any emissions related to energy generation will be equivalent or lower than those of an ultra-low NOx gas boiler)
    6. use ultra-low NOx gas boilers.
  2. CHP and ultra-low NOx gas boiler communal or district heating systems should be designed to ensure that there is no significant impact on local air quality.
  3. Where a heat network is planned but not yet in existence the development should be designed for connection at a later date.

LSx comments on SI 3

A. Development plans should include potential areas in the map to expand existing networks and establish new networks.

Comment: The provisions in SI3 focuses solely focus Energy Master Plans for large scale developments. This should be expanded to include all developments. The main thrust of this New London Plan is to include provision for small sites, therefore it is important to include small sites in the development of a heat network. Stakeholders should collaborate with the relevant stakeholders to devise local energy plans that foster district heating networks for existing and future smaller scale development schemes. Heat Networks are applicable to site larger than six dwellings.

The commentary in the document should refer to existing masterplans such as the Islington Master Plan (https://www.london.gov.uk/sites/default/files/energy_masterplan_for_london_borough_of_islington.pdf). This will provide guidance to boroughs and developers on what an energy masterplan could look like.

Energy masterplans should include provision for renewables and energy storage in order to assure that the entire grid has power capacity required by new developments. It is essential in the transition that all new developments are connected to gas in order to assure affordability of fuel.

User: Southern Housing Group

Over the last 10 years, Southern Housing Group has developed over 1000 residential properties with communal heating and has significant in-use experience of residential property on communal and district heating systems. In reality, communal heating systems without a low carbon heat source (i.e. gas boilers) increase carbon emissions due to losses and inherent inefficiencies in the system compared to individual heating systems. Therefore the GLA needs to be aware that the continued development of these schemes with no low carbon heat sources (in reality we 2 out of 10 schemes with low carbon heat sources) actually increases carbon emissions, as well as local emissions.

In addition to the environmental non gain, communal heating systems are not as cost beneficial to residents as individual systems due to the high losses and inefficiencies experienced and also have questionable reliability where a large number of properties can be left without heat and hot water due a number of external risks.

Therefore, to help improve standards in the design, specification & delivery of communal heating SHG welcomes the requirement and support for CIBSE CP1 Heat Networks: Code of Practice for the UK.

The Heat Trust standard has been developed for large heat suppliers and is a welcome development for customer protection in this currently non-regulated industry. However the requirements in the Heat Trust are currently too onerous and present too much risk for Housing Associations and Local Authorities to sign up to – however these organisation offer consumer protection in other ways and are looking to develop a version that is applicable to this type of organisation. Therefore consideration and caution needs to be given to the application of the Heat Trust requirements based on the size of scheme and operator.

User:	East London Waste Authority

Policy S13

- Although it is referenced, more weight could be given to the option of sourcing heat through Energy from Waste plants as this would tie in to other policies on managing waste within London.

User: Hilson Moran

Hilson Moran endorses the proposed increase in design flexibility for heating systems and infrastructure, and the prioritisation of air quality that runs through the London Environmental Strategy and New London Plan. However, it is recommended that policy also gives due regard to the environmental impact of the bi-products (in particular ammonia) of the selective non-catalytic reduction (SNCR) systems used to reduce NOx emissions.

With reference to the heating hierarchy, in particular the use of available local secondary heat sources in conjunction with heat pump), the National Calculation Method does not currently have a recognised methodology for calculating carbon emissions associated with neutral energy distribution systems. The final calculation method should standardise quantification of waste heat loss and should also account for the pump energy penalty, compared with higher grade energy district heating systems due to greater flow and return temperatures differential. Furthermore, the energy carbon factor or COP of systems rejecting heat to these neutral energy systems should account and benefit from this low grade waste heat recovery. Based on our research, neutral energy systems can be viable for heating only and for various development scales and should be promoted as they are more future proof from a strategic infrastructural percpective.

Hilson Moran endorses the introduction of energy storage on-site to meet current and future challenges in meeting required energy capacities and reinforcements. Notwthstanding, we recommend that Distribution Network Operators make data available to influence where energy storage is required and/or its quantum.

User:	Climate Integrated Solutions
CIS welcome the inclusion of the hierarchy under D and understand the need to move away from CHP.	

User:	Climate Integrated Solutions

CIS would like to see the inclusion of heat pumps within this hierarchy. Although not zero carbon, due to improvements in grid electricity it is felt they should be considered.
in particular if heat pumps are paired with other on-site energy generation such as solar pv

User:	Climate Integrated Solutions
CIS welcome the detail regarding future proofing.	

User:	Climate Integrated Solutions
CIS are pleased to see the updated to the London Heat Map.	

User:	Mr Chris Gannaway

Strongly support this policy, though would note that ground heat pumps and heat stores could be a possible possible solution for London along with tapping into the heat generated on the LUG system

User:	London Forum of Amenity and Civic Societies

Policy SI3 should have an additional section E ‘The Mayor will work with energy suppliers and stakeholders to address the inadequate electricity supply in the capital and the need for energy centres. Land will be safeguarded for those purposes**.**

Policy SI3 should have in section C as 3) ‘Seek the implementation of shared utility ducting systems that will avoid roads being dug up and street trees needing to be removed.’

User: London Assembly Green Party Group

Energy supplies will struggle to meet demand from London's growing population, the switch to hybrid, electric vehicles and the charging infrastructure that will be needed.

Policy SI3 focuses solely on energy master plans for large-scale development. As a major theme of the new London Plan is to promote development on small sites, it is crucial that similar energy plans are extended to all size of developments.

The Environment Committee's report, Bring me Sunshine, estimated that half the rooftops in London could be suitable for solar PV panels and that London has the potential to meet a fifth of its electricity needs from solar.

Less than half a per cent of the city's three million homes generate solar power and those provide one per cent of London's electricity needs. To remedy this, every development approved by the Mayor should be required to fit the maximum possible on-site solar panel capacity in both new build homes and offices.

Addition to Policy SI3

New section:

E Boroughs establishing their future energy requirements should, in partnership with Mayor's solar action plan, actively support small-scale PV on residential, medium and larger-scale PV on businesses, other public sector and commercial buildings, and on other suitable spaces.

Bring me sunshine, London Assembly Environment Committee, Oct 2015
https://www.london.gov.uk/sites/default/files/07a_environment_committee_-_domestic_solar_report_-_final.pdf

User: Biffa Waste Services

Please consider our representations in relation to policies SI8 and SI9 set out below. As described in those sections, the draft Plan is underpinned by the delivery of energy from waste infrastructure, which is reflected in policy SI3, and as stated at paragraph 9.8.5 this " [promotes] *local energy generation and benefit Londoners, improving London's energy security…"*

However other policies of the draft Plan, and the objectives of the draft Environment Strategy which seeks to promote alternatives to incineration, may compromise the delivery of the objectives of policy SI3. Namely, policy SI8 unnecessarily restricts the types of facilities that could be developed based on the Carbon Intensity Floor thresholds. Further detail is provided in our representation to policy SI8 which we request is also considered against policy SI3.

User: Etude

D

Swap clauses a. and b. and re-phrase to include energy sharing and efficiency measures.

Merge clauses c. and d.

Merge clauses e. and f. and re-phrase.

Proposed wording:

D. Major development proposals within Heat Network Priority Areas should have a communal heating system.

1) the heat source for the communal heating system should be selected in accordance with the following low carbon heating hierarchy:

b. connect to an energy sharing network through the capturing and using of waste heat and/or use of available local secondary heat sources. ?

c. connect to a local existing or planned heat network where it is demonstrated to be running efficiently, the cost of heat to occupants is comparable to national average heating fuel costs, and there is a zero emissions transition plan in place to ensure that the development achieves zero carbon emissions in operation (if it is not already fossil fuel free). ?

d. generate clean heat and/or power from zero-emission sources (examples include: solar technologies, heat pumps and energy storage powered by renewables). ?

use low emission combined heat and power (CHP) (where suitable for size and demand of development)?or ultra-low NOx gas boilers (in areas where legal air quality limits are exceeded all development proposals must provide evidence to show that any emissions related to energy generation will be equivalent or lower than those of an ultra-low NOx gas boiler). If the development uses fossil fuels then a zero emissions transition plan must be in place to ensure that the development achieves zero carbon emissions in operation by 2030. ?

User: MSP Strategies Ltd

There is a danger that this statement will negatively affect the delivery of technology solutions that could have hugely positive climate impact but a very minor and highy localised air quality impact because of CHP plant.

One of the reasons we have an air quality problem was a myopic focus on CO2 emissions, leading to the dieselisation of the small vehicle fleet. There is now a danger that a myopic focus of air quality could lead to a continuation of individual gas fired boilers for large developements rather than a CHP based system, that could save tonnes of CO2 emissions.

For example, the discontinuation of the Greenwich Power Station scheme on air quality grounds will almost certainly lead to increased CO2 emissions from new developments (and a financial impact to TfL).

The holistic whole should be considered on sustainable development and there are sometimes trade-offs to be made.

Clean Air in London has come up with a formula around allowing for a minor air quality disbenefit so long as there is a postiive carbon benefit by an order of magnitude. While not arguing for these exact figures such an approach is worth looking at.

Otherwise, there is a danger of the best driving out the good with the unintended consequence of embedding carbon intesive technologies in new developments, which cannot be easily retrofitted and need to be operational for several decades to get return on investment.

User: Mr Nikolas Sotnyk

Swap clauses a. and b. and re-phrase to include energy sharing and efficiency measures.

Merge clauses c. and d.

Merge clauses e. and f. and re-phrase.

Proposed wording:

D. Major development proposals within Heat Network Priority Areas should have a communal heating system.

1) the heat source for the communal heating system should be selected in accordance with the following low carbon heating hierarchy:

1. *connect to an energy sharing network through the capturing and using of waste heat and/or use of available local secondary heat sources.* ?
2. *connect to a local existing or planned heat network where it is demonstrated to be running efficiently, the cost of heat to occupants is comparable to national average heating fuel costs, and there is a zero emissions transition plan in place to ensure that the development achieves zero carbon emissions in operation (if it is not already fossil fuel free).* ?
3. *generate clean heat and/or power from zero-emission sources (examples include: solar technologies, heat pumps and energy storage powered by renewables).* ?

use low emission combined heat and power (CHP) (where suitable for size and demand of development)?or ultra-low NOx gas boilers (in areas where legal air quality limits are exceeded all development proposals must provide evidence to show that any emissions related to energy generation will be equivalent or lower than those of an ultra-low NOx gas boiler). If the development uses fossil fuels then a zero emissions transition plan must be in place to ensure that the development achieves zero carbon emissions in operation by 2030. ?

User: Ms Amber Fahey

Our greatest concern is the relationship between energy infrastructure, fuel costs and fuel poverty. There are issues around the viability of a decentralised energy network unless a critical mass of users and a range of different users are linked in in order to achieve scale, economy and balance demand and production. We are concerned that the decision to prioritise heat networks has not been grounded in an evidence based comparison with other ways of reducing greenhouse gases, particularly since new homes will be well insulated and will not require so much heat

We are also concerned about the lack of any written-in protections for heat network residents, in terms of reliability, service, or costs. There are lock-in cost implications to the consumer of a single commercial provider in any one area; essentially a monopoly, and presently an unregulated one.

We feel this policy should require that

1. a full assessment is made in each case of costs of different alternative energy supply options, dependent on number of users and energy performance to assess whether CHP and District Networks have the potential to be the best options in terms of costs for low income households and in terms of the climate and local environmental (air quality);
2. there be full consideration of renewable energy options including community owned energy projects and of community owned heat networks;
3. residents should be fully consulted on heating options in both refurbished and regenerated schemes, and buyers should be fully informed about what they are buying into.
4. there should be ongoing monitoring of new schemes to ensure that what they say will be achieved is actually delivered, with information made available to residents in understandable form, and with punitive sanctions when commitments / contracts are breached, with compensation going to the end user.

User: Twinn Sustainability Innovation

Policy SI3

Note: In future energy supply terms the roof area of our buildings is a key infrastructure for London delivering its own renewable energy. Yet there is no policy mention of the need to make roof areas available for immediate use for PV or futureproofed for it (perhaps by permitting community energy companies to use the roof areas). There are vast roof areas on many new buildings that are not being used. Indeed, PV can easily be the actual waterproofing layer (being glass), but there is no policy context to incentivise this. It should be noted that about 4 storeys of almost any low energy building can become zero-carbon, even if the building is high rise. At the very least policy should identify the need to harness the full roof space for energy generation and export surplus to the grid.

Note: Policy SI3 appears predicated on providing relatively high temperature district heating infrastructure. This is now acting as a break on improving demand reduction (level 1 of energy hierarchy). Instead, new high-density homes can easily be 'Heat Autonomous' with no need for expensive (capital & operating) district heating. These source all their heating and hot water from waste heat gains of occupants/appliances/cooking using exhaust-air heat-pumps. The advantage of high-density apartments is having less than half the exposed facade area of standalone Passivhaus houses, so they can achieve the same heating standards but using more modest double glazing with insulation. So, while heat networks may be appropriate for existing lesser insulated buildings, this is not the case for new housing with enhanced insulation standards.

There is a widespread concern in the industry that the policy requirement for district heating on new developments, together with out-of-date Grid carbon factors, is locking us into 50 years plus of high temperature combustion. Not only is this propagating gaseous and particulate pollution, but also flue heat air pollution (see air quality comments) as well as higher than needed carbon emissions. So, while Europe is investigating the next step towards heat sharing 5th generation networks, London is locking itself into 3rd generation high temperature systems. Instead, 5th generation pipe networks operate at far lower temperatures, so they can take waste heat from cooling offices and then deliver it to homes requiring domestic hot water.

Policy SI3-B6. Amend: 'how the heat network evolves to zero fossil energy sources and zero combustion by 2030'

policy SI3-D *requirement for all developments to have community heating is too proscriptive and the heating hierarchy needs updating. Ideally policy SI3-D should be completely reviewed to instead focus on the high-level objectives and move the technology prospective aspects into the SPG. However, if the policy is to remain largely as it stands, the following is recommended. Rephrase introduction to permit 'heat autonomy' using building/dwelling waste heat and other demand reductions, swap clauses a. and b. and re-phrase to include energy sharing and efficiency measures. Merge clauses c. and d. Merge clauses e. and f. and re-phrase.*

Amend to read: Major development proposals within Heat Network Priority Areas should have a communal heating system unless they can demonstrate lower energy use and carbon emission by alternative means

1) the heat source for the communal heating system should be selected in accordance with the following low carbon heating hierarchy:

b) connect to an energy sharing network through the capturing and using of waste heat and/or use of available local secondary heat sources.

c) connect to a local existing or planned heat network where it is demonstrated to be running efficiently, the cost of heat to occupants is comparable to national new-build average heating fuel costs, and there is a zero-emissions transition plan in place to ensure that the development achieves zero carbon emissions in operation (if it is not already fossil fuel free).

d) generate clean heat and/or power from zero-emission sources (examples include: solar technologies, heat pumps and energy storage powered by renewables).

e) use low emission combined heat and power (CHP) (where suitable for size and demand of development) or ultra-low NOx gas boilers (in areas where legal air quality limits are exceeded all development proposals must provide evidence to show that any emissions related to energy generation will be equivalent or lower than those of an ultra-low NOx gas boiler). If the development uses fossil fuels, then a zero-emissions transition plan must be in place to ensure that the development achieves zero carbon emissions in operation by 2030.

User: Max Fordham LLP

Comments And Response

We recommend

- **A zero emissions by 2030 transition plan to be provided for all district heat/energy networks, alongside disclosing energy usage and efficiency data to ensure that networks are part of the solution to delivering operational zero emissions.** ?
- **Future policies should require Heat Network infrastructure to not just plan to transition, but actually transition to low-carbon technology by 2030, with some provided incentives for doing so/disincentives for failing to do so. Many networks currently installed are an infrastructure that does not allow low-carbon technologies to be retrofitted.**
- **We are not in favour of having a heating hierarchy. However if it must be retained it should be renamed and rearranged to emphasis the changing priorities of a trajectory to a zero carbon London. The heating hierarchy is currently not technology agnostic as the policy must be to remain relevant over its lifetime.**?
- **The importance of minimising energy demand peaks to be strengthened. We promote this issue as part of building design as well (SI2).**
- **The GLA must support Local boroughs to implement energy policies better than they have to date by providing technical support or technical upskilling.**

Our wider comments:

- We acknowledge that industry and regulation needs to accept and use updated carbon factors and would like to see the London Plan acknowledge the change to the grid carbon factors as well in order to drive wider national regulatory change.
- This policy needs to be able to demonstrate performance and robustness, therefore quality standards need to show reasonable metrics.
- Design flats with no or minimal need for heating, i.e. focus on passive measures first. Where heat is required, focus on electric heating provision, in line with the changing grid and decarbonisation factors.

- We do not consider CHP a viable option due to NOX emission and air quality, especially in built up areas. Additionally the technology market is currently struggling to design CHP that works in today's energy market.
- We note that Combi boilers with MVHR achieve energy performance of 8 - 10% **better** than Building Regulations but they are not allowed as they are not a heat network, thus dis-incentivising good, low carbon design and services systems. Where as communal boilers perform- 3 - 5% **worse** than Building Regulations.
    - To note: Communal boilers with CHP 20 - 35 % better than Building Regulations are available, but only when analysed using out of date carbon factors, therefore they should not be allowed to be used for design.
        - ASHP COP=2 with communal boilers - 3 - 5% Worse than Building Regulations. Again this are penalised with old carbon factors.
        - Heat pumps with a coefficient of performance (COP) of 3 with Communal boilers may appear to perform as much as 20% better than Building Regulations. In reality a COP of 3 is hard to achieve, and will require highly technical skills. Can the industry reliably operate and maintain such a system. Noting we have seen many examples where operators do not have the capability to run CHP efficiently.
        - To achieve a COP of 3 would require a potentially complicated two stage system. This type of approach might be appropriate for a 1000 dwelling scheme, but is not useful for smaller developments. We don't feel there is a solution for an energy saving strategy with heat networks for smaller to medium size schemes.
    - What the plan needs to do is define where the low carbon heat is coming from first so that projects can assess carbon emissions using appropriate data.
    - Should be more use of heat from waste sources and a regulatory framework will be beneficial to assist the use of secondary heat. Currently cost and risk outweigh benefit and it is rare..
- London plan needs to provide more guidance on the applicability/ measured infrastructural benefits of energy storage strategies and how such infrastructural benefits are passed on to the projects;
    - Does the GLA want a standard calculation method to demonstrate storage performance or a bespoke approach per project.
- It should be a requirement that on larger schemes, facilities asset managers are embedded within design and procurement process in order to better deliver efficient assets in operation in line with the soft Landings approach.
- Capacity of the heat network: Policies should aim to prevent system oversizing and the policy should require evidence of lean systems opportunities, rather than being an end in and of themselves.

User: London Energy Transformation Initiative

D

Swap clauses a. and b. and re-phrase to include energy sharing and efficiency measures.

Merge clauses c. and d.

Merge clauses e. and f. and re-phrase.

Proposed wording:

D. Major development proposals within Heat Network Priority Areas should have a communal heating system.

1) the heat source for the communal heating system should be selected in accordance with the following low carbon heating hierarchy:

a) connect to an energy sharing network through the capturing and using of waste heat and/or use of available local secondary heat sources. ?

b) connect to a local existing or planned heat network where it is demonstrated to be running efficiently, the cost of heat to occupants is comparable to national average heating fuel costs, and there is a zero emissions transition plan in place to ensure that the development achieves zero carbon emissions in operation (if it is not already fossil fuel free). ?

c) generate clean heat and/or power from zero-emission sources (examples include: solar technologies, heat pumps and energy storage powered by renewables).

use low emission combined heat and power (CHP) (where suitable for size and demand of development)?or ultra-low NOx gas boilers (in areas where legal air quality limits are exceeded all development proposals must provide evidence to show that any emissions related to energy generation will be equivalent or lower than those of an ultra-low NOx gas boiler).

If the development uses fossil fuels then a zero emissions transition plan must be in place to ensure that the development achieves zero carbon emissions in operation by 2030. ?

User: GMB Trade Union (London Region)

Urgent action is required to radically transform our energy and transport systems away from fossil fuels and towards clean, renewable alternatives. To achieve this requires a reliable significant change in energy policy and strong efforts from all parts of society for investment in alternatives.

GMB urges that many Local Government Pension Funds have investments in fossil fuel companies. For example Islington Council's Pension Fund has approximately £48 million invested in fossil fuel companies, including Royal Dutch Shell and BP in their top 4 holdings.

With this investment in fossil fuel extraction, our Local Governments are directly funding climate change and air pollution which is affecting the health of our members and the community we serve.

As public bodies, councils have a responsibility to work for the public good and promote public health; they should not be financially and politically supporting the most destructive industries on the planet.

It is noted that fossil fuel investments are becoming increasingly risky; as the world takes action on climate change, fossil fuel assets are at significant risk of becoming stranded. Pension Fund Trustees have a fiduciary duty to protect members' investments from these risks.

Divesting from fossil fuels also presents an opportunity to re-invest in sectors such as low carbon, renewable clean energy source, low carbon infrastructure improvements and energy efficient social housing, which are consistent with the Council's aims.

User: Home Builders Federation

Part D is unsound because it is unjustified.

We object strongly to the Mayor insisting that developments with Heat Priority Areas must provide communal heating systems. This is a miss-use of planning policy to advance the interests of the producers of particular technologies. Planning policy should be neutral in terms of how regulatory requirements and policy targets are met. How developers comply with the Building Regulations and the London Plan targets should be a matter for them to decide. Sometimes it is practical, and developers are keen to plug into these, but sometimes it is not.

We are concerned that customers may be trapped into expensive communal heating schemes with long term and expensive maintenance requirements. The Mayor needs to be aware that the public has a right to switch supplier.

We do not support the use of a 'hierarchy' for the same reasons articulated above – that planning policy should be neutral with regard to the use of particular technologies.

We recommend that part D is re-worded to read:

"D Major development proposals within Heat Network Priority Areas are encouraged to consider providing a communal heating system where this is practical and viable, and having regard to the long-term maintenance costs for residents.

1) The heat source for the communal heating system should take into account the following:

User:	EngineersHRW

Policy SI3 Energy infrastructure

Note: To avoid lock-in to fossil fuel and combustion emissions, all energy masterplans should have a planned evolution to a zero carbon and zero combustion 2050.

User:	EngineersHRW

Policy SI3 Energy infrastructure

Clause SI3-B6. Amend: **how the heat network evolves to zero fossil energy sources and zero combustion by 2030.**

User: EngineersHRW

Policy SI3 Energy infrastructure

Clause SI3-D. Add: ... **should have a communal heating system unless they can demonstrate lower energy use and carbon emission by alternative means.**

This reinforces that demand reduction is the highest priority in the energy hierarchy and allows innovation where higher levels of energy efficiency are offered. For example: home 'heat autonomy' is within close reach for modern high density apartments if there is enhanced insulation – i.e. individual home exhaust-air heat-pumps can deliver both heating and hot water, without needing the cost, complexity and standing losses of a communal system.

User: Royal Borough of Kensington and Chelsea

9.3 Policy SI3 Energy infrastructure

The Council welcomes the introduction of energy masterplans for large scale developments.

We would support further guidance in the London Plan on combined heat and power systems from a carbon reduction and air quality perspective. The following wording is recommended:

"CHP and ultra-low NOx gas boiler communal or district heating systems should be designed to ensure that there is no significant impact on local air quality".

As specified below, we would also welcome more guidance on CHP to be provided in the Energy Planning Guidance, especially the effects on air quality. In this respect the following wording is recommended:

"Further information about the relevance of CHP in developments of various scales will also be provided in the Energy Planning Guidance document, which will be kept updated as technology changes. However, it is not expected that gas engine CHP will be able to meet the standards required within areas exceeding air quality limits with the technology that is currently available."

The Council notes and is supportive of the ambition to increase the amount of new renewable energy sources in London developments.

User: London Borough of Islington

Draft London Plan Policy

Policy SI3 Energy Infrastructure

Islington Response

Islington welcomes the policy which broadly aligns with the Local Plan approach currently adopted by the Council. We support the introduction of references to secondary heat sources, low temperature networks and the Heat Priority Areas. We note the relationship between Heat Priority Areas and areas where air quality limits have been exceeded. We support the focus on maximising co-benefits between climate change and air quality, particularly in relation to preventing impact of CHP and ultra-low NOx gas boilers on air quality. With regard heat sources, we consider it would be useful for the London Plan to set out guidance on a maximum target for carbon content for heat. We would support the introduction of a specific maximum carbon content for heat supply, which would apply to CHP and ensure low emission requirements are met.

We note that part D of the policy refers to major development proposals, in some instances there maybe opportunities for smaller scale development to connect or consider connecting to a decentralised energy network, so reference to major development proposals would preclude this as currently drafted. In addition, for future connections - both to existing networks or a future network - it would be useful if the London Plan could provide guidance on the method for securing this connection.

Part C of the policy supports expanding infrastructure although it states expansion should be identified in Development Plans. We consider that the policy should incorporate potential for major proposals to expand existing networks in a more ad hoc way, where circumstances dictate and in line with borough planned networks. For example, circumstances may change on an allocated site which means provision of an energy centre may become feasible where it previously wasn’t.

User: Port of London Authority

The PLA has no in principle objection to policies SI3 and SI4, and notes the references to heating networks. However, if such networks involve discharges to the River Thames they could result in an increase in heat discharged into the Thames. Any such network must ensure that any effects of a thermal plume (body of water significantly different in temperature to the Thames) must be limited as much as possible. It will not be acceptable to heat a significant cross section of the Thames as this creates a barrier to fish migration and could sterilise an area, and a number of consents from the PLA and the Environment Agency would be required.

The PLA recommend the following amendments to paragraph 9.3.7.

Suggested amendments to reasoned justification at paragraph 9.3.7

"Increasing the amount of new renewable energy sources in London developments is supported. This includes the use of energy from waste schemes that are connected to a heat network, as well as solar photovoltaics and solar thermal, both on buildings and at a larger scale on appropriate sites. There is also potential for wind and hydropower-based renewable energy in some locations within London ***which will require close collaboration with relevant stakeholders, such as the Environment Agency and Port of London Authority."***

User:	Association of Consultancy & Engineering

ACE supports this policy however recommends that the Mayor should make provisions to encourage London boroughs and developers should engage at an early stage with relevant energy companies and bodies to establish the future energy requirements and infrastructure arising from large-scale development proposals.

User: Marisol Ferrin

I support the ambition for London to become a zero carbon city, however this needs to be achieved sooner than 2050 if we are to meet our global commitments to tackle climate change. To do this, London needs to rapidly embrace renewable energy, including solar. The London Plan should include a clear policy to facilitate, support and promote the uptake of solar energy.

This could be achieved by adding a strong policy on solar energy (using wording in supporting text 9.2.3), by mentioning renewable energy infrastructure including solar technologies in Policy S13, and by requiring all new homes to be zero carbon.

User: Dolors Vila

I support the ambition for London to become a zero carbon city, however this needs to be achieved sooner than 2050 if we are to meet our global commitments to tackle climate change. To do this, London needs to rapidly embrace renewable energy, including solar. The London Plan should include a clear policy to facilitate, support and promote the uptake of solar energy.

This could be achieved by adding a strong policy on solar energy (using wording in supporting text 9.2.3), by mentioning renewable energy infrastructure including solar technologies in Policy S13, and by requiring all new homes to be zero carbon.

User: Helena Azzam

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User: Miriam Schmitter

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This could be achieved by adding a strong policy on solar energy , renewable energy infrastructure including solar technologies, and by requiring all new homes to be zero carbon.

User: Lillian Billing

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User: Kourosh Khakpour

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This could be achieved by adding a strong policy on solar energy (using wording in supporting text 9.2.3), by mentioning renewable energy infrastructure including solar technologies in Policy S13, and by requiring all new homes to be zero carbon.

User: Kam Sihota

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This could be achieved by adding a strong policy on solar energy (using wording in supporting text 9.2.3), by mentioning renewable energy infrastructure including solar technologies in Policy S13, and by requiring all new homes to be zero carbon.

User: PCS Trade Union

PCS advocate for the public ownership and democratic control of energy from generation, transition, distribution to supply. There appears no link in this section at all to the Mayor's Energy for Londoners manifesto commitment. Whilst PCS remains disappointed that the Mayor has chosen to go for a 'white-label' approach rather than a fully licensed energy company, we still believe that the plan should align with the broad aim to "place London on track to a zero carbon city" (page 201 of the draft Environment Strategy).

As we said in our response to the draft environmental plan "white-labelling" will tie in the GLA to an energy supply contract for some time that will create cost implications if there is a change in policy later down the line. Given the duration of the new Plan, we believe it is also short sighted in not understanding the changing nature of the energy system to a distributed, more localised, network. It goes against the grain of what is happening at other municipal levels in Nottingham or Bristol for example, community energy generation, and Labour Party policy to take back into public ownership the transmission and distribution of energy, alongside the creation of regional energy supply companies. Section 9.3.8 for example should at least reference to the Energy for Londoners proposals and/or include a distinct section on this.

We also have concerns around the reliance on heat networks in this section. Whilst they are indeed included as part of the Committee on Climate Change pathway to reducing space and water heating emissions, there are a number of issues around this energy system. These include but are not limited to affordability, market delivery and risk assumptions, long-term effectiveness in reducing GHG emissions.

As we said in our response to the draft Environment Strategy, we think it is important for communities to be actively engaged in decision making around their energy needs. Therefore mechanisms need to be established to ensure democratic control over decision making that impact people's lives. For example, as the energy system changes bringing with it more options for distributed and energy storage, communities need to play a role in energy choices and how services are run. Just as the Mayor proposed to "make sure those living on social housing estates "are at the heart of any decisions""6, so they should be on future energy provision.

Heat networks have in fact been a curse rather than a solution to high fuel costs for the social housing residents of Myatts Field North7, locked into an energy deal with E.on as part of a 40 year private finance initiative contract with Lambeth Council. Similarly a 2015 Which? Report found that "…a significant number of consumers who were dissatisfied with their district heating scheme, with cost a widely held concern."

Heat networks are unregulated. They are also a natural monopoly and we argue that the GLA should be seeking to take these into public ownership. As noted in a recent Industry Heat Network Task Force Report9, heat network assets can last “in excess of 50 years”. However their emphasis is on “investor risk” and regulation as a quid pro quo for consumer protections. Whilst we’d agree to regulation of the private market, fundamentally the best consumer protection will be public ownership of energy rather than a model of ‘privatised profits, socialised risks’ which PFI for example would bring.

PCS therefore advocate that all heat networks are brought under local authority control, and at a minimum for public buildings including council/social housing. This would be the only way to also provide the necessary support for tackling fuel poverty which again, is a key aim of the Energy for Londoners programme.

User: Adrian Jenkins

I support the ambition for London to become a zero carbon city, however this needs to be achieved sooner than 2050 if we are to meet our global commitments to tackle climate change. To do this, London needs to rapidly embrace renewable energy, including solar. The London Plan should include a clear policy to facilitate, support and promote the uptake of solar energy.

This could be achieved by adding a strong policy on solar energy (using wording in supporting text 9.2.3), by mentioning renewable energy infrastructure including solar technologies in Policy S13, and by requiring all new homes to be zero carbon.

User:	City of London Corporation

Smart meters, smart grids and local micro grids are referred to in the supporting text for policy SI2 but are not included in policy SI3. Smart energy infrastructure will become increasingly important as a means of demand management in future and this should be reflected in policy SI3 B. The initial focus of energy masterplans should be on demand management therefore policy SI 3 B should be amended to include the identification of “Opportunities for demand management through smart energy infrastructure”.

User:	City of London Corporation

SI3 D includes the heating hierarchy for communal heating systems in major developments which gives a clear instruction that non-polluting heating systems should be considered before selecting CHP, but only in areas of ‘Heat Network Priority’. This policy should apply to all AQMA’s too.

Paragraph D (2), stating that CHP/Boiler systems should be designed to ensure that there is no significant impact on local air quality, is welcomed.

User: City of London Corporation

The City Corporation's response to the above proposal in the Draft Environment Strategy stated – 'We welcome proposals for a hierarchy of energy systems that contribute towards improving air quality. We also welcome additional action to minimise emissions from gas fired combined heat and power plant, which can lead to very high local levels of nitrogen dioxide. We would like to see a detailed assessment of options for future gas fired combined heat and power plant to inform policy in the London Plan. This should ensure that both local air quality is protected, and opportunities are not lost for carbon gains from combined heat and power plant in appropriate locations. This assessment should look in detail at existing options for abatement, how effective they are and how abatement may be developed in the future.' This response is reiterated and remains the case for this consultation.

Generators are not mentioned in the policy. Air quality impacts from generators should be considered and guidance could be given on less polluting alternatives and against using backup diesel generators for Short Term Operating Response and other demand side response in areas of high pollution, as per the draft LES proposal 4.2.3d. Guidance on testing and maintenance of generators to reduce emissions and less polluting alternatives should be included in the Energy Planning Guidance document.

User: Freight Transport Association

Policy SI3 Energy Infrastructure page 329
This policy recognises that electricity demand is expected to increase due to several factors including the increased take up of electric vehicles. Van fleets operating electric vehicles require overnight charging for multiple vehicles. With many electricity substations at or near to capacity in a number of areas across the capital, this is likely to require investment in the network. However, that cost should not fall on companies which are already paying significant additional capital costs for vehicles over fossil fuel equivalents and will make the business case for investment in cleaner vehicles unviable.
For larger vehicles, where gas is a more viable alternative to diesel, appropriate refuelling infrastructure is essential. However, such vehicles come at a significant cost premium, so other incentives such as exemptions from the Congestion Charge and the London Lorry Control Scheme (gas vehicles are significantly quieter) would help enable their uptake.

User:	London Borough of Barnet

In seeking improved energy efficiency and a move to a low carbon circular economy with London becoming zero carbon city by 2050 we consider that there is scope for the Mayor to do more to encourage innovation and start-up investment. This is critical to technological advancement in supporting new ways of generating electricity at a local level.

User:	Marine Management Organisation (MMO) HM Government

The generation of energy from renewable sources has an overall beneficial effect on air quality, as compared with fossil fuels.

2.6.2.2 When developing Marine Plans, marine plan authorities should be satisfied that air quality impacts have been taken into account. They should also liaise with terrestrial authorities to consider how air quality may be improved, particularly within, or adjacent to, Air Quality Management Areas (AQMAs). In all cases,
the marine plan authority should take account of any relevant statutory air quality limits."

You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in England and parts of Wales.

User: Doosan Babcock

Policy SI3 Energy Infrastructure

General comments:

We are very supportive of the heating hierarchy for Heat Network Priority Areas and are pleased to see fuel cells being recognised as preferential to low emission CHP, and ultra-low NOx gas boilers. There are strong investment drivers for a fuel cell over low emission CHP and ultra-low NOx gas boilers, however, currently a number of these social costs are not factored into many investment decisions. When considering the social cost of pollutants and carbon, fuel cell technology is more cost effective compared to gas and biomass CHP options. For many projects, however, the capital cost remains a barrier to market, but we believe this can be driven down given timely, collaborative and clear market signals to take advantage of economies of scale. The London Plan's approach provides such a signal. Further support alongside this to enable local authorities to access funding and carry out appropriate analysis of technology options would also be beneficial.

User: Doosan Babcock

Comments on 9.3.6:

With regard to available technologies which can achieve air quality limits, below is an analysis of systems emissions and levelized cost comparisons which contribute to this debate. Fuel cells offer the lowest emissions of NOx and low emissions of CO2. In addition, when considering the social cost of these emissions fuel cells are also more favourable. It is important that the Energy Planning Guidance document includes information on CHP and that this is kept update as technology changes. However, given that it is anticipated CHP cannot meet the standards required in areas exceeding air quality limits it would be useful to also include information on other available technologies which can meet these limits (such as fuel cells).

System emissions per unit of output and levelized cost comparison for fuel cells, gas CHP and biomass CHP (with RHI payments)

	CO2 **gCO_2e/kWh of output**	**NOx** **$mgNOx/Nm^3$ of input fuel**	**Market LCOE (£/MWh)**	**Social Cost of NOx and CO2 in London (£/MWh)**	**Total 'Social LCOE (£/MWh)**
Biomass CHP	17.4	178 (assumed current	£158	£249.6	£407.6
Biomass CHP (with RHI)	17.4	19 (MCPD compliant	£74	£249.6 (based on current)	£323.2
Gas CHP	245	92-186 (assumed current) 95 (MCPD compliant)	£57.7	£171.9 (based on current)	£229.7
Fuel cells (year 0-0 units)	227	0.65	£81.3	£1.3	£82.6
Fuel cells (year 4-800 units (dependant on policy support)	227	0.65	£57.3	£1.3	£58.6

Source: Ecuity Economics (NOx emissions at 15% O_2, and dust emissions at 6% O_2)
(Analysis based on circa 500kW system)

User: London Assembly Labour Group

Suggested changes

The Plan is at odds with the Environmental Strategy and needs to be amended.

Justification for policy recommendations

Despite the Environmental Strategy saying, “London will have sufficient incineration capacity to manage London’s non-recyclable municipal waste once the new Edmonton and Beddington Lane facilities are operational.” (page 265) the Draft London Plan does not rule out future incinerators. Policy SI3 includes “Energy from waste possibilities” in the list of opportunities boroughs’ Energy Masterplans should identify. The supporting paragraph 9.3.7 states: “Increasing the amount of new renewable energy sources in London developments is supported. This includes the use of energy from waste schemes that are connected to a heat network ...”

User: Joan Taplin

I believe that everyone in London has the right to breathe clean air, have access to nature and to benefit from clean energy. I am therefore pleased to see policies in the new London Plan which seek to address these important environmental issues. These include policies to protect our Greenbelt and Metropolitan Open Land, a ban on fracking, and a commitment to London becoming zero carbon.

However, I believe the London Plan could be improved in the following ways:

Renewable Energy & Climate Change

I support the ambition for London to become a zero carbon city, however this needs to be achieved sooner than 2050 if we are to meet our global commitments to tackle climate change. To do this, London needs to rapidly embrace renewable energy, including solar. The London Plan should include a clear policy to facilitate, support and promote the uptake of solar energy.

This could be achieved by adding a strong policy on solar energy (using wording in supporting text 9.2.3), by mentioning renewable energy infrastructure including solar technologies in Policy S13, and by requiring all new homes to be zero carbon.

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Renewable Energy & Climate Change

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User:	Solar Trade Association

Policy SI3 (D) Include solar technologies in list of examples of zero-emission sources
a. For heat specifically, the potential of solar thermal should not be overlooked. Solar thermal remains effectively supported under the RHI and is particularly suited to tackling fuel poverty, given its exceptional reliability and negligible running costs. Solar thermal is also particularly well suited to dense, urban areas, given it requires little roof space and works well at all orientations bar north.

Policy SI3 (B) & 9.3.11 – Energy masterplans should identify land for energy storage (not just heat storage) and consider storage when designing energy centres
a. The nascent battery storage market needs to be stimulated. Storage is the primary lowcarbon technology for adding flexibility into our grid by optimising renewable energy and reducing peak demand.
Energy Planning Guidance – The GLA guidance document on energy assessments should provide more information on storage and the routes preferred

User:	London Waste and Recycling Board (LWARB)

We support policy SI3 – Energy infrastructure, however energy masterplans should also consider where waste could be reused, recycled or incorporated in a low carbon circular economy before being used for energy generation (point B4).

User: Canary Wharf Group

The intent of the policy in addressing London's reliance on the use of fossil fuels forheating is welcomed. We acknowledge that developing low carbon heat sources forboth new and existing homes should be a priority for the Mayor. However, we haveconcerns that the intent of the policy as it currently stands may lead to a number ofunintended consequences that require recognition in the implementation of this policy:

- Infrastructure delivery in London is extremely difficult due to legal andlandownership issues.
- The fact that CHP is given a lower priority is welcomed. We have concerns thatCHP technology is very often only specified to get through planning, after which it ismothballed in favour of boilers. This is wasteful is terms of resources, capital costand clearly won't deliver carbon savings in practice.
- There is a wider issue regarding the Mayor's prioritisation of energy infrastructure inthat homes built to high energy efficiency standards (as specified in policy SI2 C)will have very low heating demand, reducing the potential for carbon savingsthrough energy infrastructure. If a new dwelling only has an annual heating and hotwater bill of £350, the payback for the capital cost of energy infrastructure will be alot longer than for older housing stock and the carbon savings much lower.
- The policy also places reliance on an unregulated sector to deliver low carbon heat.Anecdotal evidence suggests that whilst the actual energy use in modern buildingsis relatively low, the associated operation and maintenance of communal heatingsystems can lead to higher service charges for residents. The capital costs, othercosts of maintenance and energy strike prices agreed through ESCo concessionsare often passed on to residents, leading to higher energy/service costs than thoseresulting from individual gas boilers. Predicting these costs at the design stage isnotoriously difficult and fraught with risk (numbers from SAP aren't reliable forpredicting costs). There is currently no regulatory regime to monitor and sanctionheat network operators, risking high service charges for residents.
- There is also a risk that ESCos who will want ~40 year concessions to build andoperate energy networks, will be reliant on gas fired technology which, whilstcleaner than grid electricity today, will become relatively more carbon intensive asthe grid is decarbonised. Whilst we recognise the policy intent of utilising other heatsources instead of fossil fuels, there is a concern that this will be technically difficultto implement and result in a fall back to gas fired CHP, locking-in a fossil fuel that,whilst cleaner than grid electricity currently, may not be so in 10 years time.

We would therefore ask that policy SI3 D is reworded to ‘Major development proposalswithin Heat Network Priority Areas should have a communal heating system, where it isdeemed appropriate to the development’. A tiered hierarchy to the implementation ofheat networks and energy infrastructure, similar to that proposed by the London EnergyTransformation Initiative, should be explored in more detail, using real case studies todetermine potential benefits and limitations.

User: London Tenants Federation

9.3.1 Policy SI3 – Energy Infrastructure

Our greatest concern is the relationship between energy infrastructure, fuel costs and fuel poverty. There are issues around the viability of a decentralised energy network unless a critical mass of users and a range of different users are linked in in order to achieve scale, economy and balance demand and production. We are concerned that the decision to prioritise heat networks has not been grounded in an evidence based comparison with other ways of reducing greenhouse gases, particularly since new homes will be well insulated and will not require so much heat

9.3.2 We are also concerned about the lack of any written-in protections for heat network residents, in terms of reliability, service, or costs. There are lock-in cost implications to the consumer of a single commercial provider in any one area; essentially a monopoly, and presently an unregulated one.

9.3.3 We feel this policy should require that

(i) a full assessment is made in each case of costs of different alternative energy supply options, dependent on number of users and energy performance to assess whether CHP and District Networks have the potential to be the best options in terms of costs for low income households and in terms of the climate and local environmental (air quality);

(ii) there be full consideration of renewable energy options including community owned energy projects and of community owned heat networks;

(iii) residents should be fully consulted on heating options in both refurbished and regenerated schemes, and buyers should be fully informed about what they are buying into.

(iv) there should be ongoing monitoring of new schemes to ensure that what they say will be achieved is actually delivered, with information made available to residents in understandable form, and with punitive sanctions when commitments / contracts are breached, with compensation going to the end user.

User:	London Borough of Haringey
The Council supports this policy.	

User:	London Borough of Barking & Dagenham

The Council supports the focus on making London a zero-carbon city and the policies set out to achieve this. The Council has set up a energy company to help not only deliver green energy but also tackle fuel poverty and looks forward to working in partnership with the Mayor in achieving the aim of a zero-carbon city.

User: London Borough of Lewisham

Whilst we support SI3 and have ambitious plans to connect development in the north of the Borough to SELCHP, we have some experience of, and concerns about, some decentralised energy networks and communal heating systems. Overheating and high energy bills for tenants are particular issues that need to be rectified. There are also questions about whether these systems are delivering the stated carbon savings, as evidenced in our Housing Select Committee's scrutiny report on communal heating:
http://councilmeetings.lewisham.gov.uk/documents/s37476/Communal%20Heating%20Report.pdf

and the response to Mayor and Cabinet on its recommendations:

http://councilmeetings.lewisham.gov.uk/documents/s38782/Response%20to%20SDSC%20Communal%20Heating%20Review.pdf

Monitoring and reporting on energy performance for major developments in SI2 will help address the problems of predicted and actual performance that have affected some communal systems. Policy SI3 should also be strengthened by emphasising that communal systems are designed, built and maintained to the highest industry standards (such as through the CIBSE Code of Practice for Heat Networks) and are planned in an integrated way to supply as diverse a profile of demand as possible. This would accord with our ambitions to maximise the energy generated from SELCHP and facilitate wider decentralised energy schemes in the north of the borough.

SI3 would also involve new technical assessments including energy masterplans. We feel that this extra analysis should be provided by a specialist GLA advisory / consultee team instead of relying on London Boroughs that do not have the technical expertise to fully implement the policy.

Further consideration should also be given to:

- Providing further details on how to apply this policy to large-scale developments.
- How energy masterplans for town centres and Opportunity Areas will be resourced.
- Providing better linkages between SI3 and SI5. There is a strong energy water nexus that should be considered between the two and as such, both policies should take into consideration the other.
- The need for cross boundary work, with the GLA shouldering the burden for regional scale networks.
- Whether there is any benefit to the loss of the target for 25% heat and power to be generated in London by 2025

- What agency is responsible for the installation of meters and the collection, monitoring and action on data?

User:	London Borough of Brent

The Council supports this policy.

The GLA should consider introducing supporting text to require the use of planning conditions to ensure combined heat and power (CHP) or other connections are implemented within a certain period of time e.g. 5 years. Further Energy Planning Guidance could be produced to set out good practice approaches and also address the locational / land requirements for energy centres and sub stations e.g. whether sub stations are appropriate underneath residential properties.

User: Environment Agency

We support this policy, notably, the requirement for energy masterplans' for large-scale development locations to: identify opportunities to utilise energy from waste; and, to identify possible heating and cooling network routes.

Recommendation:

SI3. Please use explanatory text to cross-reference to Policy SI1, to ensure that the air quality impacts of energy centres and heating networks are minimised.

User:	Environment Agency

We support the policy’s positive commitment to heat networks. The use of waste heat networks, including those at district-level, are widespread in many northern European countries, often as a municipally owned public utility.

User:	London Borough of Bromley

The Area Action Plan for Bromley Town Centre already includes a policy on energy networks. The first energy centre is to be included in the Site K (former Westmoreland Road car park) development at Bromley South. It is not clear how the “land for energy centres” in the supporting text will be identified and whether this to be within developments or additional land.

User:	London Councils

This policy is welcomed but, similar to the above, the loss of the target for 25% heat and power to be generated in London by 2025 is concerning. Sub policy D aims to place limitations on CHP emissions in heat network priority areas, which is helpful; however, focussing solely on heat network priority areas omits other areas which are known to experience pollution exceedances. It is therefore preferable to use AQMA designations to ensure all exceedance areas are covered by this positive policy. The development of a heating hierarchy is also welcomed, as are the proposals for minimising internal heat generation through energy efficient design.

User:	London Borough of Tower Hamlets

We consider it positive that the policy has been significantly expanded. However we note that boroughs are being encouraged to engage with energy companies, however very limited guidance is provided in relation to this. We would presume this would be through Local Plan production, so that energy companies are aware of expected growth areas and quantum, while we would expect developers to continue lead on engaging with energy companies regarding their individual developments. This should be confirmed and clarified.

User: Save Swiss Cottage

Policy SI3 – Energy Infrastructure
Our greatest concern is the relationship between energy infrastructure, fuel costs and fuel poverty. There are issues around the viability of a decentralised energy network unless a critical mass of users and a range of different users are linked in in order to achieve scale, economy and balance demand and production. We are concerned that the decision to prioritise heat networks has not been grounded in an evidence based comparison with other ways of reducing greenhouse gases, particularly since new homes will be well insulated and will not require so much heat
We are also concerned about the lack of any written-in protections for heat network residents, in terms of reliability, service, or costs. There are lock-in cost implications to the consumer of a single commercial provider in any one area; essentially a monopoly, and presently an unregulated one.
We feel this policy should require that
(i) a full assessment is made in each case of costs of different alternative energy supply options, dependent on number of users and energy performance to assess whether CHP and District Networks have the potential to be the best options in terms of costs for low income households and in terms of the climate and local environmental (air quality);
(ii) there be full consideration of renewable energy options including community owned energy projects and of community owned heat networks;
(iii) residents should be fully consulted on heating options in both refurbished and regenerated schemes, and buyers should be fully informed about what they are buying into.
(iv) there should be ongoing monitoring of new schemes to ensure that what they say will be achieved is actually delivered, with information made available to residents in understandable form, and with punitive sanctions when commitments / contracts are breached, with compensation going to the end user.

As currently drafted the proposed new plan has the potential to significantly weaken planning policy, with polices that the Mayor openly admits do not comply with national policy. The Mayor is seeking to depart from this because of the scale of his election victory

It imposes a new “presumption in favour” of development for schemes involving less than 25 houses that are less than 800 meters form a tube station (page 152-153). This applies even it if it is in the setting of a listed building or in a Conservation Area. This would make it harder to oppose planning applications like 28 Redington Road (recently successful opposed by the local community).
It is much more in favour of tall buildings (page 126-129), which means it will be even harder to object to buildings which are completely out of keeping with an area.
It weakens protection given to Metropolitan Open Land such as Hampstead Heath. The Heath has in the past had the same status as the Green belt and this should be maintained.
The plan will significantly weaken the planning protection given to Hampstead, with its historic conservation areas, open spaces (including Hampstead Heath) and unique character.
There are three policies in particular that I object to, on the basis that they are inconsistent with national planning policy.
First, Policy H2. This imposes a new “presumption in favour” of small-scale development of between 1 and 25 homes including demolition and rebuild schemes, the upwards extension of flats and residential extensions. This policy should not apply to Conservation Areas. Our area has suffered from numerous planning applications in recent years where developers have tried to demolish existing properties and rebuild them with completely inappropriate new housing within our conservation area [give examples: e.g. 28 Redington Road, 29 New End, 192 Haverstock Hill, 266-270 Finchley Road, and the impact this has had or would have had].

Weakening the protection given to our conservation areas will led to more of these applications being approved, destroying over time the special character of our area.
Second, Policy D8. This weakens existing policies on tall buildings. Tall buildings are completely inappropriate in Hampstead or the surrounding area. Planning permission has recently been granted for a 24 storey tower at 100 Avenue Road. This development is completely out of keeping with our area, will loom over our conservation areas, and result in an increase in construction traffic on our streets. The London Plan should not be supporting more tall towers that cause loss of light, overshadowing, construction and service traffic, wind tunnels, canyon effects, loss of streetscapes and disruption of community and local, innovative commerce.
Given that research has shown that mid-rise development can deliver the same housing density as high-rise development, the London Plan should not be supporting tall buildings.
Third, Policy G3. This applies to Hampstead Heath. It enables the boundaries of Metropolitan Open Land to be amended through “land swap” deals. Hampstead Heath is one of the most important areas of open space in London and is a “green lung” at the heart of our community [give personal examples of why Hampstead Heath is so important]. The London Plan should not allow Hampstead Heath’s boundaries to be amended.
Overall, the London Plan is inconsistent with national planning policy and should therefore not be approved. I do not agree that the scale of the Mayor’s election victory enables him to depart from national policy. Just as important as the Mayor’s mandate is the role that local communities have been given to shape their own communities (for example, through

Neighbourhood Plans). This must be respected. Not only this, but the London Plan lasts until 2041, and should not be shaped by the events of one election.

User:	Royal Borough of Kingston
Support.	

User: London Borough of Hillingdon

Policy SI3 places no responsibility on the Mayor to identify and assist in the delivery of new and improved energy infrastructure, particularly relating to low or
zero carbon networks. There is a significant shift towards a position where individual boroughs are required to identify appropriate solutions.

As an example, Hillingdon has three heat map opportunity areas, but to date, no assistance has been provided by the GLA to unlock their potential. They remain
strategic opportunity areas, yet have no strategic policy protection or incentives in this Plan.

If energy infrastructure is considered to be a strategic matter, criterion A of the policy should be far more robust with the plans the Mayor will put in place to deliver
the necessary solutions.

Notwithstanding the above, criterion A introduces specific requirements for 'large scale development', which is an imprecise term and open to interpretation. In
any event, energy capacity within an area is not a material planning consideration and it is not appropriate for a development plan to make it so.

Criterion B of the policy requires the production of energy masterplans for 'large-scale development locations to establish the most effective energy supply
solutions'. As above, 'large-scale' is not a defined term and therefore renders this part of the policy impractical. Additionally, there is no clarity as to who is expected to produce an energy masterplan or why.

Criterion D is unnecessary and is further evidence of a lack of strategic planning. Each major development is required to achieve zero carbon. Achieving this should be fully within the auspices of the applicant. It is entirely inappropriate to expect all major developments to have a communal heating system, particularly in opportunity areas where the lack of GLA policy assistance renders it unlikely that any connection infrastructure will come forward.

The Council is concerned that as a whole, policy SI3 has questionable aims and places too much emphasis on boroughs. Practical implementation also appears
questionable in any event and there are overlaps with other energy policies.

Taking account of the above, the Council considers that the policy should be deleted.

User: HFFTRA

Policy SI3 – Energy Infrastructure

Our greatest concern is the relationship between energy infrastructure, fuel costs and fuel poverty. There are issues around the viability of a decentralised energy network unless a critical mass of users and a range of different users are linked in in order to achieve scale, economy and balance demand and production. We are concerned that the decision to prioritise heat networks has not been grounded in an evidence based comparison with other ways of reducing greenhouse gases, particularly since new homes will be well insulated and will not require so much heat

We are also concerned about the lack of any written-in protections for heat network residents, in terms of reliability, service, or costs. There are lock-in cost implications to the consumer of a single commercial provider in any one area; essentially a monopoly, and presently an unregulated one.

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(i) a full assessment is made in each case of costs of different alternative energy supply options, dependent on number of users and energy performance to assess whether CHP and District Networks have the potential to be the best options in terms of costs for low income households and in terms of the climate and local environmental (air quality);

(ii) there be full consideration of renewable energy options including community owned energy projects and of community owned heat networks;

(iii) residents should be fully consulted on heating options in both refurbished and regenerated schemes, and buyers should be fully informed about what they are buying into.

(iv) there should be ongoing monitoring of new schemes to ensure that what they say will be achieved is actually delivered, with information made available to residents in understandable form, and with punitive sanctions when commitments / contracts are breached, with compensation going to the end user.

User: Marion Lerminiaux

I support the ambition for London to become a zero carbon city, however this needs to be achieved sooner than 2050 if we are to meet our global commitments to tackle climate change. To do this, London needs to rapidly embrace renewable energy, including solar. The London Plan should include a clear policy to facilitate, support and promote the uptake of solar energy.

This could be achieved by adding a strong policy on solar energy (using wording in supporting text 9.2.3), by mentioning renewable energy infrastructure including solar technologies in Policy S13, and by requiring all new homes to be zero carbon.

User: London Borough of Merton

Support with significant amendments. District heating networks are designed based on the assumption that all the units will be occupied. Where the level of actual occupancy is low the operation of the district heating will be very inefficient, leaving residents who are occupying their properties at risk of higher costs from inefficiently operating district heating schemes. Planning is driving the installation of district heating systems without any provision being made for quality/efficiency of their ongoing operation. Adding hooks within the district heating policy relating to ongoing operation of district heating networks according to ‘best practice’ would allow conditions to be place on networks to adopt recognised codes of practice e.g. The Heat Customers Protection Scheme.

The approach to Heat Network Priority Areas and the policy drive to deliver low temperature networks are in conflict with one another. Heat Network Priority Areas have been identified by work done by ARUP that identified clusters of existing buildings with high heating demand. Existing developments will tend to have higher operational temperatures for their heating systems which will reduce their suitability for connection to a low temperature network.

How are “Large scale development proposals” and “significant new development” defined?

Placing the responsibility for engaging with energy companies on the boroughs will place additional strain on planning departments, the responsibility should lie with the developers only.

Responsibility for establishing the energy masterplan should sit with the developer and this should be highlighted within the policy.

Heat loads from existing buildings may not be suitable for connection to new developments if there is a large difference between the operational temperature of the new and existing developments.

There should/could be a requirement for developers to provide/upload data on new development/DH system on London heat map.

User:	London Borough of Merton

It is good that the supporting text references the London Heat Map. However, in order to keep the information on the London Heat Map up to date developments could be required/conditioned to submit information about the developments district heating systems. This could be supported via a policy requirement to report information to the London Heat Map within policy SI3. A suggested example condition is contained at Appendix A of Merton's response.

Figure 9.3 – A reference to the appropriate mapping layer and a signpost to the where is can be found (e.g. the London Heat Map) would help to ensure that developers are referring to the most up to date heat map for London (see comment 9.3.3).

User: London Borough of Merton

A suggested example condition in response to Policy SI3 - Energy Infrastructure

Example condition1:

London Heat Mapping Condition:

‘Unless otherwise agreed in writing by the Local Planning Authority, no part of the development hereby approved shall be used or occupied until evidence has been submitted to the council confirming that the developer has provided appropriate data and information pertaining to the sites Combined Heat and Power (CHP) system to the Greater London Authority (GLA, environment@london.gov.uk) to allow the site to be uploaded to the London Heat Map (https://www.london.gov.uk/what-we-do/environment/energy/londonheat- map).’

Reason:
To ensure that the development contributes to the London Plan targets for decentralised energy production and district heating planning. Development Plan policies for Merton: policy SI3 of the London Plan [Date] and policy CS15 of Merton's Core Planning Strategy 2011

See Appendix A and B for images

User:	London Borough of Hounslow
LB Hounslow supports this policy	

User:	Westminster City Council

Whilst the ambitions of the policy are supported it is overly prescriptive and delves into matters beyond the remit of planning – e.g. procurement issues. Criterion B is over-detailed and too prescriptive about the content of energy masterplans. Boroughs must have the scope to agree a proportionate approach to these documents that reflects local circumstances and approaches in those cases where they consider it is appropriate to require them. There is no justification for this level of purported intervention.

Criterion D may be overly onerous for all major developments in Heat Network Priority Areas, and fails to acknowledge that there may be competing planning issues that need to be balanced; e.g. heritage concerns, optimising building efficiency, development viability, etc.

User:	London Borough of Southwark

The council supports the proactive planning of energy infrastructure in areas of largescale redevelopment. This is an important step in ensuring the delivery of decentralised energy networks. They have significant potential to reduce London’s carbon footprint but take up has so far been slow. The council is pursuing this with assistance from the Mayor through the Decentralised Energy Enabling Project for the Old Kent Road Opportunity Area Decentralised Energy Feasibility Study. On-going support for boroughs will be important to make best use of the expertise at GLA.

The council supports the integration of air quality considerations with energy infrastructure planning, and the inclusion of ultra-low NOx gas boilers and communal/district heating systems.

User: London Borough of Redbridge

The Council supports the overall aims of this policy which is a good basis for the development of more effective and efficient energy sources. In relation to establishing effective energy supply options it is important that the commercial conditions exist for this to happen. The Council has undertaken studies for a Decentralised Energy Master-plan, and whilst there is potential for decentralised energy in key growth areas mainly in the south of the borough], further feasibility work has shown that the economic viability of Decentralised Energy Networks (DEN) is highly dependent on reaching the right commercial agreement with key stakeholders in the area (major developers). Economic performance assessments for potential development schemes found that revenues were insufficient, anticipated heat loads unfavourable, and the overall financial performance insufficient to attract private sector funding.

User:	London Borough of Wandsworth
The Council supports Policy SI2 and SI3 which is in accordance with the Council’s Local Plan.	

User:	London Borough of Richmond Upon Thames
The Council supports Policies SI2 and SI3 which are in accordance with the Council’s Local Plan Policy LP22.	

User:	Expedition Engineering and Useful Studio
Welcome adoption of the revised energy hierarchy and the requirement for major developments to have energy strategies.	

User:	London Borough of Harrow

SI3: Energy infrastructure

The Council supports this policy.

Figure 9.3 (Heat Network Priority Areas) needs to be updated to reflect more recent heat network investigations in Harrow.

User: Judith Howard

I support the ambition for London to become a zero carbon city, however this needs to be achieved sooner than 2050 if we are to meet our global commitments to tackle climate change. To do this, London needs to rapidly embrace renewable energy, including solar. The London Plan should include a clear policy to facilitate, support and promote the uptake of solar energy.

This could be achieved by adding a strong policy on solar energy (using wording in supporting text 9.2.3), by mentioning renewable energy infrastructure including solar technologies in Policy S13, and by requiring all new homes to be zero carbon.

User:	The Wimbledon Society

Si3: There should be Proposals to put the overhead electrical grid underground in outer Boroughs

User:	London Borough of Enfield
Policy SI3 ‘Energy Infrastructure’ should place more weight on natural attenuation and trees as a solution to sustainable drainage.	

User: (FOE) Friends of the Earth England Wales and Northern Ireland

We would like to see the Plan adopt a more rigorous, encouraging and enabling approach to renewable energy. This would make sense given the Mayor's ambition for London to become zero carbon, help to achieve a more sustainable, resilient economy and better health and quality of life for those living and working in London.

Given the increasingly prominent role that renewables will play, it would make sense to include within this policy a specific reference to renewable energy infrastructure, including solar technologies: at present there is none. Paragraph 9.2.3 states that Boroughs should ensure that all developments should maximise opportunities for on-site electricity and heat production from solar technologies (photovoltaic and thermal) and use innovative building materials and smart technologies. This paragraph would carry more weight expressed as policy rather than supporting text and we suggest that it be added to Policy SI3.

We suggest that text be added to the Plan which highlights the role of passive design in heating, cooling, shade and light in creating comfortable buildings which reduce energy consumption, pollution and running costs. These points should also be picked up in Policy D2 Delivering Good Design. Micro-generation and community energy schemes have the potential to benefit communities and contribute towards sustainable energy infrastructure and we suggest that the Plan encourages these.

User: London First

The intent of the policy in addressing London's reliance on the use of fossil fuels for heating is welcomed. We acknowledge that developing low carbon heat sources for both new and existing homes should be a priority for the Mayor. However, we have concerns that the policy as currently drafted may lead to several unintended consequences: for example, higher costs to residents through increased and unregulated service charges, and long-term reliance on fossil fuels to provide heating as a time when the electricity grid is being decarbonised.

We welcome that this draft policy takes a more realistic approach towards CHP. CHP technology is very often included within development schemes but thereafter dispensed with in favour of connection to the grid and use of traditional boilers.

There is a wider issue regarding the Mayor's prioritisation of energy infrastructure in that homes built to high energy-efficiency standards (as specified in policy SI2 C) will have very low heating demand, reducing the potential for carbon savings through energy infrastructure. If a new dwelling only has an annual heating and hot water bill of £350, the payback for the capital cost of energy infrastructure will be a lot longer than for older housing stock and the carbon savings much lower.

The policy also places reliance on an unregulated sector to deliver low-carbon heat. Anecdotal evidence suggests that whilst the actual energy use in modern buildings is relatively low, the associated operation and maintenance of communal heating systems can lead to higher service charges for residents. The capital costs, other costs of maintenance and energy strike prices agreed through ESCo concessions are often passed on to residents, leading to higher energy/service costs than those resulting from individual gas boilers. Predicting these costs at the design stage is notoriously difficult and fraught with risk (numbers from SAP aren't reliable for predicting costs). There is currently no regulatory regime to monitor and sanction heat network operators, risking high service charges for residents.

There is also a risk that ESCos that will want 40-year concessions to build and operate energy networks will be reliant on gas-fired technology which, whilst cleaner than grid electricity today, will become relatively more carbon intensive as the grid is decarbonised. Whilst we recognise the policy intent of utilising other heat sources instead of fossil fuels, there is a concern that this will be technically difficult to implement and result in a fall back to gas-fired CHP, locking-in a fossil fuel that, whilst cleaner than grid electricity currently, may not be so in 10 years' time.

Each development and its context are different, and it is important that the right approach for the site is achieved which delivers the lowest carbon outcome. Given the legal and technical challenges, policy SI3 should offer a menu, rather than hierarchy, of heat options, with selection made on the lowest-carbon option for the development. It should not be necessary for applicants to commission extensive and expensive reports on why different options are not viable.

Part D of policy SI3 D currently reads:
Major development proposals within Heat Network Priority Areas should have a communal heating system
1) the heat source for the communal heating system should be selected in accordance with the following heating hierarchy:

It should be amended to read:
*Major development proposals within Heat Network Priority Areas should have a communal heating system**, where it is deemed appropriate to the development**:*
1) the heat source for the communal heating system should [Delete: be selected in] ***take into account*** *the following heating options* ***according to feasibility and viability****:*

User: Berkeley Group

Energy Infrastructure

10.17. In assessing potential to connect to heat networks or use secondary/waste heat it is important to consider the technical and legal implications of doing so. The cost and legal implications of connections are considerable; a third party cannot be put in a monopoly position where a developer is forced to contract with them. This has to be considered at the initial contract stage as well as after the initial contract period, in order to protect the residents' long term interests. Residents cannot be exposed to a ransom situation in order to secure energy in the future. Consideration needs to be given to the event that the heat source is not available in the future.

10.18. Each development and its context is different and it is important that the right approach for the site is achieved which delivers the lowest carbon outcome. Different technologies are suited to different circumstances and development types; for example air source heat pumps require a substantial amount of roof-space which would limit the ability for green roofs and urban greening, and means that there is insufficient space on buildings taller than seven storeys.

10.19. The energy efficiency of modern homes means that there is very low demand for heating, the consideration in energy supply is therefore hot water as there is little demand for space heating. Communal heating may not be the most appropriate solution in all cases and needs to be balanced against other objectives, such as tackling over-heating.

10.20. Given the legal and technical challenges, policy SI3 should offer a menu, rather than hierarchy, of heat options, with selection made on the lowest carbon option for the development. It should not be necessary for applicants to commission extensive and expensive reports on why different options re not viable.

Policy SI3 Energy infrastructure

D Major development proposals within Heat Network Priority Areas should minimise carbon and have a communal heating system where appropriate and the least carbon option.

1) the heat source for the communal heating system should ~~be selected in accordance with~~ take into account the following heating ~~hierarchy~~ options according to feasibility and viability:

a) connect to local existing or planned heat networks

b) use available local secondary heat sources (in conjunction with heat pump, if required, and a lower temperature heating system)

c) generate clean heat and/or power from zero-emission sources

d) use fuel cells (if using natural gas in areas where legal air quality limits are exceeded all development proposals must provide evidence to show that any emissions related to energy generation will be equivalent or lower than those of an ultra-low NOx gas boiler)

e) use low emission combined heat and power (CHP) (in areas where legal air quality limits are exceeded all development proposals must provide evidence to show that any emissions related to energy generation will be equivalent or lower than those of an ultra-low NOx gas boiler)

f) use ultra-low NOx gas boilers.

User: Rebecca Rose

I support the ambition for London to become a zero carbon city, however this needs to be achieved sooner than 2050 if we are to meet our global commitments to tackle climate change. To do this, London needs to rapidly embrace renewable energy, including solar. The London Plan should include a clear policy to facilitate, support and promote the uptake of solar energy.

This could be achieved by adding a strong policy on solar energy (using wording in supporting text 9.2.3), by mentioning renewable energy infrastructure including solar technologies in Policy S13, and by requiring all new homes to be zero carbon.

User: TUC London, South East and East of England

Policy SI3: Energy infrastructure

1. We support the use of waste to generate energy
2. We support the exploration of the potential if a publicly owned and controlled ‘London Energy Company’.
3. We support the development of efficient, robust and low cost ‘heat energy networks’. However, reports of the system introduced at Myatts Fields in London, introduced by tender and managed by the private sector on a long-term contract, seem to illustrate some of the hazards; frequent breakdowns and loss of both heat and water, and massive bills for residents who are ‘locked in’ to the arrangement.
4. London’ petrol stations are disappearing rapidly in central areas; this decline needs to be managed to ensure that the resource remains available for local people, and to those LGP vehicles which need fuel points.
5. The transition to electric vehicles will require an infrastructure of charging points which London’s suburban streets are not well appointed to provide. The evolution of street furniture can assist in this respect.
6. Vehicle pooling should be supported by the planning system.

User: Just Space

SI3 Energy infrastructure

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

What Needs to be Done:

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

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

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

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

All efforts should be made for pension fund divestment from fossil fuels and reinvestment in renewables. The GLA should implement full and immediate divestment from all fossil fuel companies. Future proofing by recognising that the supply of energy for cooling, and the supply of cooling itself, will become increasingly important over time. Similarly, the supply of energy for electric vehicles will change the dynamics of energy generation and consumption. There are increasing prospects of vehicle batteries acting as storage for non- continuous renewable energy, for example.

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

Caring for Existing Homes

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

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

What Needs to be Done:

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

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

— Prioritise adaptations to the homes of older residents.

— Prioritise fuel-poor and vulnerable households .

— Identify synergies between new developments and existing homes.

— Though retrofitting of energy and water efficiency measures, decentralised energy and renewable energy options.

— Make the link with public health programmes (for example, a boiler on prescription programme for those most vulnerable).

— Include minimum energy efficiency standards as a condition of licensing in the private rented sector.

— Encourage energy rights initiatives and community based energy projects.

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

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

Quality of New Homes

Presently: New homes are not being delivered with full consideration of longevity and durability of construction (c.f. embodied energy). The health of residents should guide design, avoiding the negative impact of dark homes and outside spaces and providing sufficient communal areas. The GLA has permitted developments far above levels agreed in the density matrix, yet there has been no analysis of the effects on health and wellbeing of people living in them or affected by them. Attempts to reduce standards of sun and day-lighting for development will have knock-on effects on energy consumption and amenity spaces that need to be carefully analysed.

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

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

What Needs to be Done:

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

New homes should be energy positive.

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

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

User: Kingston University

Policy S13 Energy Infrastructure
This draft policy promotes sustainable energy and is supported in principle by the University; it is actively working to reduce its carbon footprint. The University recognises the impact of day-to-day operations on the environment and therefore remains committed to its ambition to reduce carbon emissions by 35% against a 2005/06 benchmark by 2020. Having already delivered significant reductions against the benchmark, it is proud to be ranked 15th out of all higher education institutions in the country, in terms of carbon reduction performance over the last three years.

Optional:

Clause B of draft Policy S13 identifies that energy masterplans should be developed for large-scale development locations which establish the most effective energy supply options, stating that energy masterplans should identify:

“1) major heat loads (including anchor heat loads, with particular reference to sites such as universities, hospitals and social housing)”.

While the underlying aims of this draft policy are endorsed, the University notes that additional support is required at a strategic and local level to assist with practical implementation, and to ensure the viability of development projects is fully taken into account in promoting sustainable energy projects.

User:	Association for the Conservation of Energy

Policy SI3 Energy infrastructure

ACE considers that Policy SI3 has missed the need to balance energy supply and demand.

The Mayor should ensure that developers and energy companies work in partnership to explore options for demand reduction and demand flexibility, alongside options for energy supply, and choose the least cost options for meeting London’s energy service needs.

User: Veolia

Veolia supports this policy. Increasing the amount of renewable energy sources in London will be important to meet the Mayor’s zero-carbon target. A key part of this will be maximising the utilisation of energy from waste and developing new and existing district heating networks.

District heating solutions are designed to deliver the best energy efficiency for the communities they serve, which range from private developments, social housing, community, education and commercial buildings, to campuses or even whole cities. Supplying centralised heat and potentially electricity and cooling, they can be fed by Energy from Waste facilities, local Combined Heat and Power (CHP) or biomass. Major benefits include cost savings, greatly reduced emissions and carbon footprint, independent electricity supply and less exposure to electricity price fluctuations.

In London, Veolia operates the district heating network in Southwark from South East London Combined Heat and Power plant (SELCHP) which provides circa 3,000 local properties with heat and hot water. This scheme has proven very valuable in assisting the council's fight against fuel poverty by producing heat cheaper than gas and providing low carbon heat, as the waste that SELCHP burns is approximately 60% renewable carbon. The system saves an estimated 8,000 tonnes of CO 2 per year.

There is the potential to significantly increase the district heating network from SELCHP, which has been designed to allow for additional connections to be made in the future. We are also exploring the possibility to install private wires for electricity connections with private developers and/or businesses. The benefits of private wire networks include localised energy security and more certainty over the costs for use of the network in the longer term.

The Mayor could support such projects by making it easier to develop heat networks in London and linking new developments to local generators.

User:	Federation of Small Businesses

Many small businesses have similar energy usage patterns to those of residents. We ask that deals made available to residents for fair tariffs, retrofitting energy demand reduction systems, renewable fuels and community energy programmes are also extended to small and micro businesses.

User: LEVC

Policy SI3 Energy infrastructure:

- LEVC agrees that reliable electricity supply is essential for the functioning of any modern city and believes that energy preparedness is essential for a sharp transport modal shift towards electric vehicles.

The Mayor has set out in his Transport Strategy that he would like to see 9000 electric taxis on the street by 2020 and for all taxis to be electric by 2033. In order for this to be achievable the Mayor will need to engage in a large-scale rolling deployment of rapid 50kW DC electric vehicle chargepoints across London, supported by a secure electricity supply.

User:	Rosalind Readhead
Solar must be integral to all new development.	

User:	Rosalind Readhead

Automation is a high energy user. The rush to automation cannot reduce our energy consumption sufficiently to meet the climate targets set by the Paris agreement.We must prioritise low energy, carbon efficient strategy.

User:	SEGRO

We recognise the London Plan’s desire to move to a more diverse range of low and zero-carbon sources, including renewable energy and secondary heat sources. On-site renewables are promoted on our schemes, where applicable, but competing sustainable requirements for roof use in other parts of the plan may compromise full potential.

User: Notting Hill Housing Trust

NHHT supports the Mayor's ambition to ensure energy infrastructure in London is truly sustainable. We also support the emphasis for developers to adopt a strategic approach towards the delivery of energy networks. NHHT's priority is to establish the most appropriate and affordable energy solution for each development site, with careful consideration of site specific opportunities to connect to existing/future energy networks.

Whilst not specifically referenced in the policy, NHHT is aware that the GLA is increasingly providing funding and practical support/guidance to boroughs on the development and implementation of local heat networks. We welcome this support as knowledge and understanding of heat networks (technical, commercial and legal) within boroughs in vital to effective delivery of networks. Where boroughs have the in-house expertise to develop energy masterplans, developers such as NHHT are able to assist them in achieving their network delivery aspirations by reducing our risk, costs and uncertainty.

NHHT note that part D references Heat Network Priority Areas as does the associated map at Figure 9.3. We are concerned that development sites in our ownership that are in close proximity to one of these areas will be encouraged to provide communal heating in those specific cases where this may not represent the most cost effective solution for our future residents. We would encourage the Mayor to incorporate a provision within the policy that considers the affordability of proposed communal heating systems to residents as well as the viability of connecting to an established heat network and again, ensuring that this represents a best value for money option for future residents. In order to undertake this work those public or private bodies responsible for delivering the heat network will need to make available the following:
A. Technical specification
B. Heat tariff rates (including service charges)

We wish to draw the Mayor's attention to the fact that its aspirations for deployment of large scale heat networks are likely to be hampered by technical incompatibility in relation to heat source. In particular, we understand from our M&E engineers that different heat generation technologies dictate different flow temperatures, and system design is often locked in to higher temperature flows through sizing of pipes, HIUs, radiators, etc. We therefore have longstanding concerns about the feasibility of the GLA's aspirations for widespread heat network connectivity – contrary to popular view, heat networks are unfortunately not entirely technology agnostic.

Where an energy master plan or a heat network has not been established and where this information is not forthcoming, NHHT would welcome the Mayor allowing developments to bring forward their own heating solutions i.e. standalone heat pump systems on smaller developments.

NHHT appreciate the aspiration of the heating hierarchy at part D, however we wish to caution that the hierarchy's preferred technologies are not yet commercially deliverable, and therefore developers like ourselves are likely to continue utilising technologies lower down the hierarchy for several years whilst technology develops and commercialises.

Whilst electrical energy generation is not mentioned in this policy, NHHT has experienced difficulties where development has triggered a need for UKPN electrical infrastructure improvements, whereby UKPN advise that an incremental improvement is not possible and hence we are expected to fund the cost of major upgrades far in excess of those required by our own development. As indicated in our response to Policy T6.1 Residential parking, a combination of policy requirements and the general impact of new developments is causing greater pressure on electrical infrastructure. We recognise that the GLA has no jurisdiction over UKPN, however we would very much welcome any assistance the GLA or Local Planning
Authorities could provide in facilitating co-ordination between developers bringing forward planning applications, to enable a more strategic and joined-up approach and the sharing of costs – thereby helping to unlock and de-risk development projects. We expect this issue to heighten in coming years with the electrification of heat and transport.

User: British Property Federation

Whist we support the intent of this policy, there are a number of issues that we believe need further thought. We believe that the Mayor's prioritisation of energy infrastructure may elicit some issues around carbon savings. Homes built to high energy efficiency standards (as specified in Policy SI2) will have low heating demand, reducing the potential for carbon savings through energy infrastructure. If a new dwelling has an annual heating bill of £350, the payback for the capital cost of energy infrastructure will be significantly longer than for older housing stock and the carbon saving much lower.

We also believe that there is a risk that Energy Service Companies who will want 40-year concessions to build and operate energy networks, will be reliant on gas fired technology which, whilst marginally cleaner than grid electricity today, will become relatively more carbon intensive in the short term as the grid is decarbonised. Whilst we recognise the policy intent of utilising other heat sources instead of fossil fuels, there is a concern that this will be technically difficult to implement and, in some instances, result in a fall back to gas fired CHP.

We would therefore request that Policy SI3 D is reworded to *'Major development proposals within Heat Network Priority Areas should have a communal heating system,* ***where it is deemed appropriate to the development'***. And part 1) reworded to '*the heat source for the communal heating system should* ***take into account the following options according to feasibility and viability****:'*

Given the varying context, priorities, and challenges of individual development proposals it is important that the correct approach is taken in aid of delivering the lowest carbon outcome for a specific site. In light of the legal and technical challenges associated with this endeavour we recommend that policy SI3 should offer a range of heat options as opposed to imposing a hierarchy.

User:	Canal & River Trust

The Trust welcomes policy SI2, particularly the requirement to exploit local energy resources as point 2 of the energy hierarchy. The policy identifies secondary heat as a local energy resource and, in turn, secondary heat is defined as including heat that exists naturally within the environment, including water.

We have commented at length on the potential for our waterways to provide thermal energy as part of heating and cooling networks in our response to the London Environment Strategy (appendix C). We would welcome further discussions with the Mayor’s advisors on this matter.

User:	Canal & River Trust

The Trust welcomes the requirement for energy masterplans to be prepared for ‘large scale development locations’ and the recognition of the need to consider secondary heat sources, including thermal energy in water. It is unclear, however, whether this requirement falls to developers at planning application stage or local planning authorities preparing local plans. Without further clarity provided in the policy, we suggest that there is a risk that this requirement will go unmet. The Trust also suggests that the plan should recognise the need for energy masterplans to feed into overall site masterplans so that space for energy centres can be planned into large scale developments, helping to meet the need identified in para 9.3.11.

User:	London Environment Directors' Network (LEDNet)

Policy SI3 Energy infrastructure

Focussing solely on heat network priority areas omits places which are known to experience pollution exceedances, and we therefore suggest the following changes:

D Major development proposals within ~~Heat Network Priority Areas~~**Air Quality Management Areas** should have a communal heating system

User: Crest Nicholson PLC

We consider this Policy to be unsound as currently drafted and amendments are required.

Policy SI3 Part D

Crest Nicholson is concerned that a blanket approach to communal heating systems does not recognise that lower density schemes (which despite a desire to increase density as set out in the Draft London Plan will still be appropriate in some parts of London) generally will struggle in viability terms to accommodate the communal heating systems proposed by Part D. Further, the Draft London Plan does not take into consideration the running costs for occupiers; district heating generally commands a high charge to customers in housing developments, especially those in low rise developments.

As with comments on other policies, viability needs to be recognised as it may be that instead of pursuing a costly communal heating system it may be preferable for a Borough and applicant to instead increase affordable housing provision. As such flexibility should be built into Part D and we suggest it is reworded as follows:

""D Major development proposals within Heat Network Priority Areas are encouraged to consider providing a communal heating system where this is practical and viable, and having regard to the long-term maintenance costs for residents.
1) The heat source for the communal heating system should take into account the following:

User: Jayshree Bakrania

Renewable Energy & Climate Change

I support the ambition for London to become a zero carbon city, however this needs to be achieved sooner than 2050 if we are to meet our global commitments to tackle climate change. To do this, London needs to rapidly embrace renewable energy, including solar. The London Plan should include a clear policy to facilitate, support and promote the uptake of solar energy.

This could be achieved by adding a strong policy on solar energy (using wording in supporting text 9.2.3), by mentioning renewable energy infrastructure including solar technologies in Policy S13, and by requiring all new homes to be zero carbon.

User:	South East Waste Authority Planning Advisory Group (SEWPAG)

2. It is not always clear how intentions expressed in the ‘preamble’ to policies are followed through in policy. In other words while intentions may be set in supporting text unless these are clearly followed through in policy it is unlikely that they will be realised. For example, whilst text concerning energy infrastructure (related to Policy SI3) notes that to achieve the Mayor’s zero-carbon by 2050 target there will be an increasing need for decentralised energy, there appears to be no explicit general requirement in policy for boroughs and/or developers to ensure that development utilises decentralised energy. Another example is the clear support stated in text at paragraph 9.3.5 for the development of low temperature networks whereas it is not obvious how this support has translated into policy. This also applies to statements concerning hazardous waste which are considered in more detail below.

User:	South East Waste Authority Planning Advisory Group (SEWPAG)

4. Support for inclusion of expectation that ‘Energy Masterplans’ should be prepared for ‘large-scale development’ that should identify possible opportunities to utilise energy from waste. (SI3 A 4)), as this will support development of energy from waste/thermal treatment facilities within London. The policy would be more
effective if a definition of ‘Energy from Waste’ was included that should include mass burn incineration.

5. Support for expectation that major development proposals within Heat Network Priority Areas should have a communal heating system with heat source from
existing or planned heat networks and use of available local secondary heat (SI3 D 1) a) & b) as this will support development of energy form waste/thermal treatment facilities within London.

6. The Mayor’s zero-carbon by 2050 target is supported, as is the support for renewable energy and secondary heat sources and the clear recognition (paragraph
9.3.7) that energy from waste schemes connected to a heat network constitutes such an energy source.

User: Benhill Residents

Our greatest concern is the relationship between energy infrastructure, fuel costs and fuel poverty. There are issues around the viability of a decentralised energy network unless a critical mass of users and a range of different users are linked in in order to achieve scale, economy and balance demand and production. We are concerned that the decision to prioritise heat networks has not been grounded in an evidence based comparison with other ways of reducing greenhouse gases, particularly since new homes will be well insulated and will not require so much heat

We are also concerned about the lack of any written-in protections for heat network residents, in terms of reliability, service, or costs. There are lock-in cost implications to the consumer of a single commercial provider in any one area; essentially a monopoly, and presently an unregulated one.

We feel this policy should require that

1. a full assessment is made in each case of costs of different alternative energy supply options, dependent on number of users and energy performance to assess whether CHP and District Networks have the potential to be the best options in terms of costs for low income households and in terms of the climate and local environmental (air quality);
2. there be full consideration of renewable energy options including community owned energy projects and of community owned heat networks;
3. residents should be fully consulted on heating options in both refurbished and regenerated schemes, and buyers should be fully informed about what they are buying into.
4. there should be ongoing monitoring of new schemes to ensure that what they say will be achieved is actually delivered, with information made available to residents in understandable form, and with punitive sanctions when commitments / contracts are breached, with compensation going to the end user.

User: Earls Court Public Sector Tenants' Assoc

Our greatest concern is the relationship between energy infrastructure, fuel costs and fuel poverty. There are issues around the viability of a decentralised energy network unless a critical mass of users and a range of different users are linked in in order to achieve scale, economy and balance demand and production. We are concerned that the decision to prioritise heat networks has not been grounded in an evidence based comparison with other ways of reducing greenhouse gases, particularly since new homes will be well insulated and will not require so much heat

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User: Elaine Chambers

Policy SI3 – Energy Infrastructure

Our greatest concern is the relationship between energy infrastructure, fuel costs and fuel poverty. There are issues around the viability of a decentralised energy network unless a critical mass of users and a range of different users are linked in in order to achieve scale, economy and balance demand and production. We are concerned that the decision to prioritise heat networks has not been grounded in an evidence based comparison with other ways of reducing greenhouse gases, particularly since new homes will be well insulated and will not require so much heat

We are also concerned about the lack of any written-in protections for heat network residents, in terms of reliability, service, or costs. There are lock-in cost implications to the consumer of a single commercial provider in any one area; essentially a monopoly, and presently an unregulated one.

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1. a full assessment is made in each case of costs of different alternative energy supply options, dependent on number of users and energy performance to assess whether CHP and District Networks have the potential to be the best options in terms of costs for low income households and in terms of the climate and local environmental (air quality);
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User: Silvertown Homes

The policy states that ‘Energy masterplans should be developed for large-scale development locations’. Large-scale is not defined.

This policy must both explicitly define ‘large-scale’ and be clear about what material will be required in support of a planning application and what will be sought post-permission.
Bearing in mind the extent of detailed design work which takes place post-permission, the emphasis should be on securing details by condition or obligation and not at the planning
application stage.

User:	Silvertown Homes

It is agreed that London must manage heat risk, but this policy is too simplistic and idealistic. It must acknowledge the interrelationship of overheating with air quality, carbon consumption, daylight / sunlight and private amenity space.

This policy should be revisited to consider the relevant matters in a holistic manner and not topic-by-topic.

User:	Silvertown Homes

This paragraph states that ‘To ensure heat networks operate efficiently, effectively and reliably, the Mayor supports standards such as the CIBSE CP1 Heat Networks: Code of Practice for the UK and the Heat Trust standard’.

Adopting such standards will increase build costs. This must be acknowledged in the London Plan given that this has implications for overall scheme viability and the capacity of a development to deliver public benefits such as affordable housing.

User: John Lewis Partnership

Policy SI3 Energy Infrastructure *page 329*

This policy recognises that electricity demand is expected to increase due to several factors including the increased take up of electric vehicles. Fleets operating electric vehicles require overnight charging for multiple vehicles. With many electricity substations at or near to capacity in a number of areas across the capital, this is likely to require investment in the network. However, that cost should not fall on companies which are already paying significant additional capital costs for vehicles over fossil fuel equivalents and will make the business case for investment in cleaner vehicles unviable.

For larger vehicles, where gas is a more viable alternative to diesel, appropriate refuelling infrastructure is essential. However, such vehicles come at a significant cost premium, so other incentives such as exemptions from the Congestion Charge and the London Lorry Control Scheme (gas vehicles are significantly quieter) would help enable their uptake.

User: Peter Lawrence

I support the ambition for London to become a zero carbon city, however this needs to be achieved sooner than 2050 if we are to meet our global commitments to tackle climate change. To do this, London needs to rapidly embrace renewable energy, including solar. The London Plan should include a clear policy to facilitate, support and promote the uptake of solar energy.
This could be achieved by adding a strong policy on solar energy (using wording in supporting text 9.2.3), by mentioning renewable energy infrastructure including solar technologies in Policy S13, and by requiring all new homes to be zero carbon.

User:	Institution of Civil Engineers - London region

Energy Networks

ICE London believes that combined heat and power domestic units should be considered in new developments, which would help reduce carbon, and improve air quality.

We also strongly believe in a roll out programme of monitoring Underground station air quality and ensure new stations contain air pollution reduction solutions. This should also work in tandem with underground heat management systems, which can be used to supply energy.

User:	Bishopsgate Goods Yard Regeneration Limited

Policy SI3 deals with energy infrastructure and Part D states that major development proposals within Heat Network Priority Areas should have a communal heating system. Part D(1) lists a hierarchy of heat sources which should be selected, including low emission combined heat and power (CHP) at Part (e). Our client would like to highlight that gas CHP is not a viable technology beyond the short term because it won't offer a carbon saving in comparison to using grid electricity and conventional heating systems as the grid de-carbonises. In the short term, gas CHP is likely to be the only viable way for a development to meet the carbon targets proposed in the London Plan and therefore not an optimal approach in terms of long term carbon saving. This outcome should be avoided and as such, we would suggest that Policy SI3(D) is revised to add flexibility and recognise that major development proposals within Heat Network Priority Areas should have a communal heating system only in cases where it is deemed appropriate to the development.

User:	Barratt Developments plc

The policy states that ‘Energy masterplans should be developed for large-scale development locations’ . Large-scale is not defined.

This policy must both explicitly define ‘large-scale’ and be clear about what material will be required in support of a planning application and what will be sought post-permission.
Bearing in mind the extent of detailed design work which takes place post-permission, the emphasis should be on securing details by condition or obligation and not at the
planning application stage.

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This paragraph states that ‘To ensure heat networks operate efficiently, effectively and reliably, the Mayor supports standards such as the CIBSE CP1 Heat Networks: Code of Practice for the UK and the Heat Trust standard’.

Adopting such standards will increase build costs. This must be acknowledged in the London Plan given that this has implications for overall scheme viability and the capacity of a development to deliver public benefits such as affordable housing.

User: North London Waste Plan

Policy S13 Energy Infrastructure	Support at B that energy masterplans for large scale developments should identify the possible opportunities to utilise energy from waste and at 9.3.7 the use of energy from waste is included as a renewable energy source where connected to a heat network.

User: London Borough of Sutton

SUPPORT. The London Borough of Sutton supports Policy SI3 and acknowledges the need to develop energy masterplans for Opportunity Areas and other large scale development locations, such as Sutton Town Centre, Hackbridge and the London Cancer Hub (LCH) site.

While there are some changes in terminology, this policy essentially carries forward the Mayor's existing approach to delivering decentralised energy networks, which is being promoted through the GLA's ongoing decentralised energy enabling project (DEEP). However the Mayor's amended 'heat hierarchy' places significantly increased emphasis on a number of important cross-cutting issues such as the role of low temperature heat networks in achieving cost-effective use of low grade heat, the use of available local secondary heat sources, the use of fuel cells and the need to ensure that any proposed CHP plants or gas boilers are ultra-low NOx and will have no significant impacts on local air quality. Figure 9.3, which shows Heat Network Priority Areas in relation to areas in breach of legal air quality standards is particularly useful.

The London Borough of Sutton notes that gas fuelled CHP is considered unlikely to be able to meet the NOx emissions standards required for developments within areas which are already exceeding air quality standards and recognises that alternative technologies such as heat pumps serving low temperature networks are increasingly likely to be used in future. The production of updated Energy Planning Guidance for London is therefore welcomed.

The supporting text provides some welcome clarity on the minimum specifications and performance standards which should be followed by developers and/or energy infrastructure operators to ensure that heat networks operate efficiently, effectively and reliably.

The London Borough of Sutton does not agree however that the Mayor's abandonment of the current interim target to ensure that at least 25% of heat and power generated in London by 2025 is from decentralised or renewable sources. There should be interim targets on the way to reaching the Mayor's ultimate target of London being a zero carbon city by 2050.

User:	ClientEarth

The Mayor also needs to ensure that energy policy does not undermine any air quality improvements delivered by transport. We are especially worried about decentralised energy systems, such as gas engine Combined Heat and Power (CHP)), that could contribute to local sources where people live and work. The Mayor should consider reviewing the heat/energy hierarchy through consultation. Any air quality policy in energy should apply London-wide rather than just in areas exceeding legal limits. Otherwise we could lose improvements the Mayor has delivered.

User: Persimmon Homes

Part B could delay housing delivery

In terms of Energy Masterplans, the Policy should make it clear that it is the responsibility of the relevant London Local Authorities to produce these. Given the
imperative to increase housing supply to meet needs, the Policy should make it clear that development should not be preclude pending the preparation and adoption of Energy Masterplans.

In addition, the Policy should require the Energy Masterplans to; (a) be consulted upon and (b) be subject to viability testing and (c) not seek to delay the delivery of housing developments, (d) have a clear delivery plan that identifies the role of various parties, including the public sector and utilities.

The Energy Masterplans should not solely look at the ‘most effective energy supply options’ as this is too narrow a focus / brief. Consideration needs to be given to a range of other factors including viable, cost effective and deliverable.

User:	London Borough of Newham

Policy SI3 – Energy Infrastructure

In general LBN are supportive of this policy and it is deemed to be complementary to Newham's Draft Revised Local Plan.

Policy SI13 sets out local authority and developer requirements. It is not clear what part the GLA will play in achieving the aims and objectives of this policy and therefore this should be addressed. For instance, OAPFs could be a useful vehicle through which to do energy masterplanning, a useful place to add value in the absence of local expertise.

It is noted that there is an absence of support for exploring innovative energy technologies. The policy should take a more pro-active and future proofed stance in supporting innovation

User:	North London Waste Authority

NLWA welcomes the inclusion of these statements about energy infrastructure within the NLP.

NLWA recommends that energy masterplans should also consider where waste could be reused, recycled or incorporated in a low carbon circular economy before being used for energy generation to ensure consistency with the waste hierarchy. This is subject to adequate demand in reuse and recycling markets, and economic viability.

User:	Croydon Limited Partnership

Policy SI3 deals with energy infrastructure and Part D states that major development proposals within Heat Network Priority Areas should have a communal heating system. Part D(1) lists a hierarchy of heat sources which should be selected, including low emission combined heat and power (CHP) at Part (e). CLP would like to highlight that gas CHP is not a viable technology beyond the short term because it won't offer a carbon saving in comparison to using grid electricity and conventional heating systems as the grid de-carbonises. In the short term, gas CHP is likely to be the only viable way for a development to meet the carbon targets proposed in the London Plan and therefore not an optimal approach in terms of long term carbon saving. This outcome should be avoided and as such, we would suggest that Policy SI3(D) is revised to add flexibility and recognise that major development proposals within Heat Network Priority Areas should have a communal heating system *only in cases where it is deemed appropriate to the development*.

User:	Brent Cross Cricklewood Development Partners

Policy SI3 deals with energy infrastructure and Part D states that major development proposals within Heat Network Priority Areas should have a communal heating system. Part D(1) lists a hierarchy of heat sources which should be selected, including low emission combined heat and power (CHP) at Part (e). The DPs would like to highlight that gas CHP is not a viable technology beyond the short term because it won't offer a carbon saving in comparison to using grid electricity and conventional heating systems as the grid de-carbonises. In the short term, gas CHP is likely to be the only viable way for a development to meet the carbon targets proposed in the London Plan and therefore not an optimal approach in terms of long term carbon saving. This outcome should be avoided and as such, we would suggest that Policy SI3(D) is revised to add flexibility and recognise that major development proposals within Heat Network Priority Areas should have a communal heating system *only in cases where it is deemed appropriate to the development*.

User:	Clarion Housing Group

While we support the intent of this policy and heat networks, there are a number of issues needing further investigation: To get the most out of heat networks there needs to be a body to link up schemes – a heat network equivalent to the utilities network companies - to manage the network infrastructure and legal issues of connections. There is also the issues around the current use of gas which is likely to be more carbon intensive as the grid is decarbonised and electricity becomes cleaner over time.

Clause SI3-B 12) Add: ***Energy master plans should identify a coordinating body to manage the network.***

User: Clarion Housing Group

The London Plan is pushing towards hybrid solutions to energy provision and infrastructure and which are more complex. There are already challenges with simple CHP systems to manage and maintaining costs at acceptable levels. We have experience of numerous examples of existing CHP systems where people's homes are cold, the communal areas overheat and the costs are unacceptable / unaffordable. It is critical to get the design and the energy provision elements of these systems (and any future hybrid systems) right to avoid; increasing fuel poverty, impacting on health/ life expectancy and the deterioration caused to the fabric of buildings by associated damp / condensation.

Alternative demand reduction via fabric first is the priority to address fuel poverty as well as considering alternatives such as heat pumps prior to a district heat network. CHP is currently more carbon intensive and saddling vulnerable poor residents with a heating infrastructure that is more expensive and inflexible to incorporate improved updated systems.

Clause SI3-D Add: ***a communal heating system unless they can demonstrates lower energy use and carbon emission by alternative means.***

User: BAE Systems

Energy infrastructure (Policy SI3)

While the goal of increasing the use of electric vehicles in London is right, our streetscapes are not yet equipped with the required infrastructure to service them. The widespread uptake of electric vehicles will place new and increasing demand on London's energy infrastructure. Boroughs and providers need support in the long-term to deliver on the Plan's objectives in this area.

In the meantime, hybrid technology can offer significant emissions reduction without the need for additional energy infrastructure and so should be championed. **Hybrid buses, trucks and other vehicles should be considered as part of the mix of technologies going forward to deliver on our commitments to improve air quality.**

User: London Sustainable Development Commission

The commission is also concerned that further detailed guidance should be provided surrounding the role and use of energy masterplans in Policy SI3. Policy SI3 B sets out the requirements for an energy masterplan, however these are largely for district heating masterplans. Opportunities to realise larger scale PV solutions, or anaerobic digestion are not included. Energy masterplans need to understand the full opportunities within a specified area to realise energy efficiency solutions, low carbon and renewable energy generation options as well as passive energy designs, and encourage a more strategic and coordinated approach to retrofitting across Local Plans.

The London Plan has also strongly supported the development of heat networks, and Policy SI3 continues to encourage developers to install district heating wherever appropriate. Major opportunities for heat networks to extend beyond a development, to link into nearby heat loads, are however still being missed. This is why the Mayor proposed in the London Environment Strategy (LES) to *“have a more direct role in the delivery of heat networks, significantly increasing the rate of their development in London”* by establishing *“a District Heating Network Delivery Body for London that secures funding, and in partnership with London Boroughs”*. Such a delivery body is vital if London is to achieve its decentralised energy and zero carbon goals, and reference to this initiative should be made in SI3.

Paragraph 9.3.6 (SI3) states that CHP is not expected to be able to meet the standards required within areas exceeding air quality limits. This is a significant statement as gas engine CHP has been the principal component of the London Plan’s drive to increase the amount of decentralised energy in the capital. The draft London Plan should provide further clarification about the future use of gas-CHP in London. Similarly, if the Mayor’s ambitions for a zero carbon city are to be met, the Mayor must place greater priority in resolving how these significant levels of new generation capacity can be accommodated in an electricity network that has not been designed for such operation.

User:	London Sustainable Development Commission

- Policy SI3 to include reference the full range of opportunities to realise energy efficiency solutions.
- A District Heating Network Delivery Body for London is vital if London is to achieve its decentralised energy and zero carbon goals, and reference to this initiative should be made in Policy SI3.
- Further clarification in SI3 supporting text on the future use of gas-CHP in London

User: Arup Building Engineering Team

There does need to be a strategic approach to energy networks, but it should be wary of investment in infrastructure that locks in carbon emitting solutions for the future.

We support for “low temperature thermal networks” because this allows for many future pathways and is therefore 'technology agnostic' which is appropriate for a long-term plan.

We are wary of lock-in with high temperature networks especially where the energy centres cannot be retrofitted with heat pumps. We note the relationship between this policy and SI2, in particular the energy strategy requirement for a route map to zero carbon. This transition reporting must be taken seriously and assessed technically in order to deliver on carbon reduction commitments.

We would welcome support and encouragement for the sharing of heat/ energy where there is no commercial advantage to developers, but there is a clear carbon reduction benefit.

User:	Enterprise M3 Local Enterprise Partnership (LEP)

We welcome the capital’s commitment to meet a zero-carbon target by 2050 and the recognition that 95% of its energy is sourced from outside the GLA boundary Indeed, this is a challenge that regions outside of London also face. We are already working on an energy strategy with a number of neighbouring LEPs and we look forward to working with London LEP as part of a wider partnership to deliver a South East wide BEIS funded Energy Hub that will look at how to achieve this ambition.

User: Hoare Lea LLP`

Part A

With the encouraged shift to electrification, the energy demands for a development could have increased impact on the resilience of local infrastructure. As such,
consultation and coordination with local electricity supply companies at early stages would be beneficial.

Whilst annual energy requirements are important in benchmarking the development, it is the peak electricity demand which dictates the necessary substation capacity. Developers could be incentivised to use electricity at times when it is most favourable to the local grid – be that from a resilience or carbon perspective – and could be encouraged to deploy methods of providing demand side response (DSR).

Ensuring electric vehicle charging points are futureproofed for vehicle-to-grid (V2G) would also be beneficial.

User:	Highgate Society

Comment:

We urge the use of LETI wording for 1) a-d regarding Heat Network proposals and designs, and suggestions for SPGs on heat networks air quality and affordability aspects.

User: Hoare Lea LLP`

Part B

The principle that energy masterplans are developed for large schemes continues to be important. This will ensure a coordinated strategy is deployed for large developments and that they are consequentially designed sustainably. Looking to the future, achieving the zero carbon target will be very difficult without developments taking a holistic approach to reducing emissions.

The addition of secondary heat sources and land for energy storage to the list of assets to be identified reflects progress in the energy sector.

The plan would benefit from a better framework for incentivising the deployment of energy storage. Appreciation of the emissions reductions which can be realised by deploying energy storage is not currently within the calculation methodology; therefore, energy storage does not reduce a developer's necessary carbon offset contribution. However, energy storage will reduce carbon emissions by offsetting electricity during peak periods when the highest carbon forms of generation are required to bolster the grid. Energy storage could be considered on a par with renewable generating technologies and a suitable mechanism for attributing carbon savings be included. Battery storage will become increasingly important as the grid greens and could be essential to delivering the 2050 zero carbon target.

User: Hoare Lea LLP`

Part C

With the encouraged shift to electrification, the energy demands for a development could have increased impact on the resilience of local infrastructure. As such,
consultation and coordination with local electricity supply companies at early stages would be beneficial.

Whilst annual energy requirements are important in benchmarking the development, it is the peak electricity demand which dictates the necessary substation capacity. Developers could be incentivised to use electricity at times when it is most favourable to the local grid – be that from a resilience or carbon perspective – and could be encouraged to deploy methods of providing demand side response (DSR).

Ensuring electric vehicle charging points are futureproofed for vehicle-to-grid (V2G) would also be beneficial.

User: Hoare Lea LLP`

The principle of a hierarchy for heating, in a sector where technological developments are unpredictable and potentially disruptive, seems inflexible. As such, should progress be made within the sector for a particular technology – fuel cells for example – the hierarchy places restrictions on when a potentially more beneficial technology can be deployed. In response, the hierarchy could be amended to require the deployment of the technology with the lowest overall environmental impact at that point in time, with due consideration of how the technology is projected to perform in future.

The benefit of continuing to include CHP is unclear. It has been shown that, if accurate carbon factors are used, CHP actually cause a net emissions increase compared to individual gas boilers, and this situation will only worsen as the grid decarbonises further. In addition to this, even with NOx abatement technology, achieving emissions lower than that of ultra-low NOx gas boilers is a significant challenge for CHP. Given the timescales over which the plan is intended to be adopted, CHP could be actively detrimental to the objective of reducing London's carbon emissions in the future.

User: London Borough of Ealing

Energy Infrastructure (SI3)

Whilst this policy is supported, in respect of its implementation, as the LPA will likely be most familiar with the latest progress on establishing networks in its area, we would welcome early dialogue with the GLA officers in advance of any comments being issued, so that the latest information can be shared with all parties and to ensure consistency in the advice issued by both the LPA and the GLA.

User:	Peabody

Peabody seeks to develop quality homes with high environmental standards. We are currently undertaking research into communal heating systems, their efficiency, and how they impact our tenants in practice. There is a need to review the effectiveness and sustainability outcomes of large scale heating schemes. In particular, there is need for greater and more robust evidence to understand whether the increased provision of non-fossil fuel electricity is truly offset by a reduction in running and hence use of fossil fuel. It is important to ascertain whether residents simply pay more for an ideal rather than a fact. Given the often substantial cost and the lack of evidence of the benefits, we do not believe that there should be a requirement in Heat Network Priority Areas to use communal heating systems. There should be scope for flexibility in individual appraisals.

User:	Chairs of Camden's Conservation Area Advisory Committees

General request 1: We would welcome a presumption against planning consent for the installation of air-conditioning plant, especially in traditional buildings. Our concern is both to do all we can to minimise the use of energy, but also to address the impact on adjacent buildings, residents and workers.

General request 2: Given the need for more housing, and the development of Town Centres, we are concerned to ensure that the ventilation of retail food outlets does not harm the amenity of residential space.

User: CIBSE

We support the adoption of strategic approaches at the GLA and Borough level.

We broadly support the heat hierarchy, but would stress the following:

- Low-temperature systems are crucial in maximising future flexibility to adopt a range of low-carbon sources. While there is already guidance from the Mayor on this, it is not necessarily always followed.
- We welcome the references to the CIBSE Code of Practice for guidance on design and operation, and to the Heat Trust Standard for consideration of consumer protection and affordability.
- In order not to jeopardise the Mayor's plan for air quality and for a zero carbon city by 2050, networks should minimise the risk of "tying in" developments to fossil fuel generation. District energy schemes should therefore produce plans for long-term transition to zero-carbon and zero-air-pollution emissions, well before 2050 (as there will also be emissions from the existing stock to deal with in order to achieve a full "zero carbon city" by 2050); a possible target date of 2030 has been suggested by members and by the LETI initiative; we would broadly support this and add that if applicants submit proposals for later dates than 2030, this should be justified and no later than the 1st replacement of their plant (e.g. if an applicant expected completion of the network by 2022, with an assumed plant life of 15 years, the network should have plans for zero-carbon and zero-air-pollution to be achieved by no later than 2037).
- While we recognize the potential for fuel cells to offer low carbon and low polluting emissions, the technology is still at early stages of application. As noted elsewhere in our response, we believe that policy should be outcome based and technology neutral: policy should focus on the desired outcomes (including carbon reduction, low air polluting emissions, flexibility and future-proofing), without being overly specific on the technologies to adopt. These should be best identified by project teams, for the specificities of their project, taking account of the latest technology developments. We do not think fuel cells warrant in themselves a place in the energy hierarchy, differentiated from other low-carbon and low-emissions technologies – for example, they could be amongst the range of options listed under point (c).
- As highlighted in our response to policy SI2, the evaluation of carbon savings offered by individual technologies is reliant on carbon factors for natural gas and grid electricity. The one currently used in Part L for grid electricity is not representative of the actual situation, and the gap is expected to widen in the future. This significantly modifies the assessment of carbon savings by technologies such as CHP and heat pumps, and should be taken into account in energy and carbon strategies. In addition to using carbon factors that are more representative of the current situation, energy and carbon strategies should be evaluated against likely future carbon factors, to ensure they are as robust as possible and likely to deliver the best long-term outcomes.

SI3 should include a similar policy than SI2, i.e. there should be a requirement to monitor and report on the performance of district energy schemes, separately from the individual buildings being served. This would help monitor implementation, inform future policy, and distinguish between the responsibilities of different parties.

User: DPDgroup UK Ltd

Policy SI3 Energy Infrastructure

The implementation of alternative fuel vehicles including electric final mile will place significant demands on the cities electrical infrastructure. DPD are less concerned about on street charging as our delivery drivers are active throughout the day however supplies to buildings are costly, take a long time and are complex to install. Utilities installation is the greatest risk on any new build project.

Through our implementation of an expensive charging solution DPD are already working to reduce the load on the electrical rid but will need security of supply to be able to operate electric vehicles and provide the associated benefits.

It is vital that as developments are bought forward that the electrical installation is future proofed, any new development should have to make a contribution to this process. The latest technology in larger vehicles is in CNG, LNG and hydrogen and these vehicles will only be feasible for operators if fuelling stations are also developed.

User: Glass and Glazing Federation

Additional information: GGF policy solutions

Incentivise the industry

- The Mayor has stated he will be London's "most pro-business Mayor" and the GGF is very keen to work with City Hall to ensure our members, made up of SMEs and large businesses, are sufficiently incentivised to help reach the ambition of reducing carbon emissions and keeping energy bills down for Londoners.
- The Mayor would like to *"develop new and innovative approaches"* to energy efficiency, and GGF members invest millions into research and development for windows and glazing. We would very much like to work in partnership with City Hall to ensure incentives are in place for more innovative products to be brought to market.
- Currently, sales for windows and glazing, including energy efficient products, are approximately 40% lower across the UK than pre-2007 levels.
- Plainly, the private sector has a key role to play in making London's homes more energy efficient, but City Hall must work with our industry to ensure consumers understand the benefits of energy efficient windows, and businesses are incentivised to install these products in homes which have previously been overlooked for upgrades to their windows.
- **We therefore propose City Hall uses ring-fenced funding to offset the cost of VAT bills to incentivise consumers to purchase energy efficient windows. Figure 1 clearly shows how we envision the funding being used.**
- **We believe a funding pot of between £13-15 million would be adequate and could be administered by the Government approved Fensa scheme (Glazing Competent Person's Scheme) which replaces windows, doors roof windows and roof lights across England.**
- **In the past, City Hall has run energy programmes such as RE:FIT, funding energy efficiency programmes to reduce carbon emissions in London, and we recommend a new fund is launched, using the grant provided by central government to the GLA, to tackle poor energy efficiency performance in London's existing housing stock.**
- In summary, we are not we are not advocating a reduction in VAT but an 'offset' payment. We believe that this could actually increase the uptake of very high standard glazing and thus increase the overall tax take.

Figure 1: Flow of funding (refer to rep)

Recommendation 3: City Hall should allocate subsidies specifically for increasing energy efficiency and award funding to consumers who purchase energy efficient rated windows.

User: Mr Darren Coppins

Developments of 10 homes of more that are in the heat network priority areas (the majority of the GLA built environment) are required to have communal heating systems (Policy SI3D1). Yet only those where a heat network is planned but not yet in existence are to make allowance for future connection (Policy SI3-D3).

a. This suggests that there will be no new heat networks other than those currently planned.

b. By requiring smaller projects (say 10 to 50 dwellings) to use communal heating systems which will predominantly feature gas low nox boiler heat generation (until such times as water to water heat pumps are commercially proven) there will be greater carbon emissions overall due to the summer heat losses. This in turn impacts summer comfort and increases summer emissions associated with retrofit and portable cooling devices.

c. Where heat networks are not planned, developments should be given more flexibility to explore alternative options. As an example, a residential development with well-designed integration of individual heat pumps can achieve similar carbon reductions whilst aligning future carbon reductions to the decarbonisation of the grid. Such strategies can result in a lower cost of installation and better use of the site (no energy centre) and it is important that savings associated with not providing the communal heating must be used to further improve fabric.

d. SAP2016 currently proposes to be ‘more realistic’ with community heating efficiency. It will prove much more difficult in future to meet carbon reduction targets via the use of gas boiler systems alone.

e. Communal heating schemes are most viable where CHP is employed. Considering the air quality policies, CHP will be less viable and thus the associated carbon reductions will not be achieved resulting in reduced viability for communal energy schemes.

User:	Harefield Tenants and Residents Association

7. In similar vein we feel there is missed opportunity in the draft plan. An example is the reference to energy infrastructure needs. Harefield will be home to major new electricity infrastructure to serve HS2, and is currently undergoing numerous major utility diversions for HS2. No consideration is being given to how any of this work could be adapted or harnessed for current local improvement needs, or to future-proof local infrastructure for any increased local demand. The same applies to flood protection - efforts are being made to protect HS2 from flood risk and to minimise worsening of Harefield's current flood risk. No thought is being given to taking the opportunity to actually improve flood protection. We feel that this kind of approach ought to be at the heart of "good growth" - not just adding new development and attempting to minimise its harm, but actually improving what is already in place to make it all work better for everyone.

User: Hornsey & Wood Green Labour Party

LETI suggests that D should be:

Major development proposals within Heat Network Priority Areas should have a communal heating system. 1) the heat source for the communal heating system should be selected in accordance with the following low carbon heating hierarchy:

a. connect to an energy sharing network through the capturing and using of waste heat and/or use of available local secondary heat sources.

b. connect to a local existing or planned heat network where it is demonstrated to be running efficiently, the cost of heat to occupants is comparable to national average heating fuel costs, and there is a zero emissions transition plan in place to ensure that the development achieves zero carbon emissions in operation (if it is not already fossil fuel free).

c. generate clean heat and/or power from zero-emission sources (examples include: solar technologies, heat pumps and energy storage powered by renewables).

d. use low emission combined heat and power (CHP) (where suitable for size and demand of development) or ultra-low NOx gas boilers (in areas where legal air quality limits are exceeded all development proposals must provide evidence to show that any emissions related to energy generation will be equivalent or lower than those of an ultra-low NOx gas boiler). If the development uses fossil fuels then a zero emissions transition plan must be in place to ensure that the development achieves zero carbon emissions in operation by 2030.

LETI's suggestions for SPGs are:

- Promote efficient low or zero carbon solutions for each development size and type. This will change over the lifetime the technology is installed for. The inclusion of heat networks should not override all other decision making processes.
- Provide guidance on appropriateness of heat networks to new development that is outside heat network priority areas or has low heat demand. Guidance could suggest applicants skip to part c. of the heating hierarchy where applicable.
- Ask applicants to be clear on assumed local air quality impacts/ limits and estimate likely annual energy costs to see if they represent a risk in terms of fuel poverty.

- Request the disclosure of heat network carbon factors used for calculations and during the lifetime of the operation of the plant. This is essential to understand the assumptions made by applicants and whether they are realistic.
- Provide links to guidance on low temperature heat networks and energy sharing within and between developments.
- Where heat pumps are proposed by applicants, encourage a shift away from high global warming potential (GWP) refrigerant use.
- Where LETI's suggested policy wording (above) is adopted, include a definition of an 'energy sharing network' and the requirements of a 'zero emissions transition plan'.

And GLA actions:

- Update the London Heat Maps to include current plant and in-use efficiency data on heat networks.
- Create strategic plans with local authorities for heat network opportunity areas. This should not be left to developers to determine, there is a strategic role here.
- Lobby government to class heat network infrastructure as a nationally recognised utility.
- Provide support for local authorities to follow-up on zero emissions transition plans and ensure implementation.

User: ENGIE

ENGIE welcomes this opportunity to respond to the Mayor’s draft London Plan consultation. In particular we welcome the following:

- The Mayor’s acknowledgement of the need for a level the playing field for heat networks and the need for Central Government to facilitate this through ensuring a fairer business rates regime for heat networks and improving wayleave and access rights for heat network operators- amongst other measures. Furthermore, if the GLA is to realise its ambition of accelerating heat network deployment across London, it will need to engage Central Government on other issues hindering heat network deployment more generally. These issues include the SAP and SBEM calculation methodologies for apportioning carbon savings to buildings connecting to heat networks. In their current state, these methodologies continue to understate the carbon saving benefits of connecting new buildings and dwellings to heat networks.
- The GLA’s identification of Heat Network Priority Areas, where densities are high enough for networks to provide a competitive solution for supplying heat to buildings and consumers. We believe that this will help accelerate the deployment of heat networks in areas where it is most feasible and cost effectiveness to do so.

User: ENGIE

We however have concerns around the GLA’s position regarding the future role of gas CHP and the expectation that current gas CHP technology will not be able to meet air quality standards within areas exceeding air quality limits.

We believe that with the correct flue design aided by a comprehensive dispersion analysis, current gas CHP technology can continue to operate in all areas across London with minimum impact on ground level NOx levels. Where the above measures remain inadequate, CHP operators can consider the use of NOx abatement technologies such as catalytic converters.

Additionally, gas CHP has the ability to deliver substantial energy and carbon savings and is on average 30% more efficient relative to thermal power stations. We therefore believe that gas CHP still has a significant role to play in London’s future energy mix.

User:	ENGIE

Regarding the specific proposals outlined in the draft London Plan, we have concerns around the lack of clarity on whether the “ultra low NOx boiler” limit of 40mg will be assessed at source or at street level. Further clarity on this issue is important as it has compliance implications for developments wishing to connect to heat networks supplied by gas CHP.

User: ENGIE

In conclusion, we recommend that:

- The London Plan allow for dispersion modelling and analysis of gas CHP emissions and for this be undertaken relative to “ultra low NOx “boilers at street level. We believe that this will help provide a more accurate assessment of the air quality impacts of gas CHP relative to “ultra low NOx boilers” at street level.
- The London Plan allow for the installation of NOx abatement/reduction technologies such as catalytic converters to gas CHP to enable them to further reduce any NOx related emissions.

User: Mr Sydney Charles

LETI suggests that D should be:

Major development proposals within Heat Network Priority Areas should have a communal heating system. 1) the heat source for the communal heating system should be selected in accordance with the following low carbon heating hierarchy:

a. connect to an energy sharing network through the capturing and using of waste heat and/or use of available local secondary heat sources.

b. connect to a local existing or planned heat network where it is demonstrated to be running efficiently, the cost of heat to occupants is comparable to national average heating fuel costs, and there is a zero emissions transition plan in place to ensure that the development achieves zero carbon emissions in operation (if it is not already fossil fuel free).

c. generate clean heat and/or power from zero-emission sources (examples include: solar technologies, heat pumps and energy storage powered by renewables).

d. use low emission combined heat and power (CHP) (where suitable for size and demand of development) or ultra-low NOx gas boilers (in areas where legal air quality limits are exceeded all development proposals must provide evidence to show that any emissions related to energy generation will be equivalent or lower than those of an ultra-low NOx gas boiler). If the development uses fossil fuels then a zero emissions transition plan must be in place to ensure that the development achieves zero carbon emissions in operation by 2030.

LETI’s suggestions for SPGs are:

- Promote efficient low or zero carbon solutions for each development size and type. This will change over the lifetime the technology is installed for. The inclusion of heat networks should not override all other decision making processes.
- Provide guidance on appropriateness of heat networks to new development that is outside heat network priority areas or has low heat demand. Guidance could suggest applicants skip to part c. of the heating hierarchy where applicable.
- Ask applicants to be clear on assumed local air quality impacts/ limits and estimate likely annual energy costs to see if they represent a risk in terms of fuel poverty.

- Request the disclosure of heat network carbon factors used for calculations and during the lifetime of the operation of the plant. This is essential to understand the assumptions made by applicants and whether they are realistic.
- Provide links to guidance on low temperature heat networks and energy sharing within and between developments.
- Where heat pumps are proposed by applicants, encourage a shift away from high global warming potential (GWP) refrigerant use.
- Where LETI's suggested policy wording (above) is adopted, include a definition of an 'energy sharing network' and the requirements of a 'zero emissions transition plan'.

And GLA actions:

Update the London Heat Maps to include current plant and in-use efficiency data on heat networks.

• Create strategic plans with local authorities for heat network opportunity areas. This should not be left to developers to determine, there is a strategic role here.

• Lobby government to class heat network infrastructure as a nationally recognised utility.

• Provide support for local authorities to follow-up on zero emissions transition plans and ensure implementation.

User: ADE - Association for Decentralised Energy

Response to proposals relating to heat networks

Heat networks can provide a range of economic/social, technical, environmental, and employment benefits. In addition to being able to provide cost-effective heat to a range of customers, heat networks are a key tool in the decarbonisation of heat. Heat networks have a similarly positive impact on local jobs and growth. For example, meeting government ambitions for clean growth by 2030 for heat networks could lead to up to 64,000 jobs created annually, over the five year lead-time of a heat network scheme delivery.[1]

The ADE welcomes the Mayor's strong recognition of the importance of expanding heat network development in London, and is encouraged to see that the New London Plan identifies that the regulatory barriers currently preventing this will require both Central Government and regional policy changes.

[1] *Market Report: Heat Networks in the UK. The ADE, January 2018. p11.*

User: ADE - Association for Decentralised Energy

Summary

The New London Plan’s ambition for a clean, green, low-carbon is welcome. Finding an integrated approach to deliver energy locally is crucial if London is to meet its goals of sustainable development.

The Association welcomes the Mayor’s recognition of expanding heat network development in London, and is encouraged to see that the New London Plan identifies that the regulatory barriers currently preventing this will require both Central Government and regional policy changes. The ADE is encouraged to see support for existing standards, and would like to continue working with the GLA to support mechanisms that ensure all London heat networks are procured, built and operated to a high standard.

Further, the Association is encouraged by the Mayor’s vision for a ‘smart’ city, and welcomes the recognition that smart technologies, including DSR, have a crucial role to play in London’s future infrastructure.

The ADE supports the Mayor’s ambition to improve the air quality in London. The Association would welcome the opportunity to work with the GLA to ensure proposals are introduced and implemented in a manner that will result in the best overall outcomes, including delivering tangible improvements and aligning with the wider ‘smart’ agenda.

User: ADE - Association for Decentralised Energy

Levelling the field

The Association welcomes the ambition to level the playing field for heat networks with other utilities, and is supportive of proposals to:

- Ensure heat networks have wayleave and access rights identical to gas, electricity and water networks, which will help lower operating costs and improve investor confidence.
- Ensure heat networks are treated fairly under Business Rates law. While heat networks continue to be subject to rates calculated using the Contractor's Basis of Valuation then network operators continue to pay more than their fair share. This also has a significant effect on the financial viability of building and expanding networks. As such, further work is needed to establish equitable treatment for heat networks with regard to Business Rates.

User: ADE - Association for Decentralised Energy

Ensuring heat networks design delivers in practice

The ADE welcomes the GLA's interest and commitment to ensuring that all new buildings deliver their expected performance in reducing costs for residents and carbon emissions. It is right that the GLA and local planning authorities are taking the necessary steps to ensure building developers are meeting their delivery obligations.

The Association is encouraged to see support for standards such as CP1 Heat Networks Code of Practice and the Heat Trust standards. The ADE is proud to have led in establishing these standards, and continues to work with industry on avenues to promote uptake and adherence to them.

Further to CP1 and the creation of Heat Trust, the ADE, working with its members, is taking the next step to better ensure heat networks are properly built and operated. Currently there is no standardised mechanism for holding all parts of the supply chain to account to ensure that networks meet standards for network build. The Heat Network Technical Compliance Scheme currently being developed by the ADE plans to issue its first outputs in Autumn 2018 and could be similarly useful in ensuring all heat networks are required to be built and operated to the same high standards.

The ADE sees that there is likely a need for the New London Plan to specifically require minimum technical and customer standards, allowing developers to use existing schemes such as Heat Trust, and the Heat Network Technical Compliance Scheme, as a way to show those standards have been delivered. The Association would welcome the opportunity to work with the GLA to develop these standards in a way that ensures all networks in London are efficient, reliable and affordable.

User: ADE - Association for Decentralised Energy

Building on strong foundations: A role for competition and regulation?

Delivering high customer service and technical standards has taken industry leadership, but there is more to be done to ensure every heat networks deliver for their customers.

In addition, the loss of direct Government support in 2021 and the absence of clear investment signals as exist for water, power, and gas networks means the industry needs a sustainable, long-term investment framework.

To meet these twin ambitions, the ADE launched an industry-led Task Force comprising of industry, consumer representatives, and the financial community (as well as observers from Government, Ofgem, and the Competition and Markets Authority).

The ADE recently published the industry Heat Network Task Force report[2] of recommendations on Post-2020 Heat Network Arrangements, which focuses on further protecting customers by reducing investment risk for new district heating networks to a comparable level with new gas, water and power network investments. By doing so, the result will be reduced cost of investment, and this helps drive down the cost of heat to customers, and increase investment into the sector. *The Shared Warmth; Industry Heat Network Task Force Report* can be found on the ADE website.

The Heat Network Task Force concluded that a regulatory framework which includes a Demand Assurance linked to customer service obligations is the only model that addresses the vital risk of future heat demand.

Demand Assurance is a proposed model in which a heat network developer would produce a Strategic Plan for a heat network development. The plan would be based on reasonable expectation of heat demand arising from customer connections as the heat network is built out. The Strategic Plan would be submitted to a regulator (or their agent) for consideration. Once a Strategic Plan was approved, a Demand Assurance covering the heat demand, based on customer connections set out in the Strategic Plan, would be offered to the developer. This Demand Assurance would assure investors that, should the heat demand not arise as predicted under the plan (either in capacity or timing), an element of the investment would be protected. As a minimum this protection would cover the cost of capital for demand shortfall. The Demand Assurance would operate as a safety net, ensuring that the heat network developer was incentivised to secure new heat customers as quickly

as possible to achieve the returns anticipated. As part of the Demand Assurance, the developer would be obligated to meet conditions including minimum customer service requirements, and heat network design and build standards. These conditions would be based on mitigating the other risks associated with a heat network, including the risks faced by customers.

Such a framework would provide an opportunity to mitigate the other key risks through conditions obligated as part of the Demand Assurance. This approach enables investment through de-risking in the heat network market to a level equitable with the regulated utilities.[3]

The ADE would welcome the opportunity to continue working with the GLA on identifying ways in which industry and Government can work together to deliver an enduring heat network market that works for customers.

[2] *Shared Warmth | A heat network market that benefits customers, investors and the environment. The ADE, January 2018.*

[3] *Shared Warmth | A heat network market that benefits customers, investors and the environment. The ADE, January 2018. p19-20.*

User: ADE - Association for Decentralised Energy

Creation of Heat Network Priority Areas

The creation of Heat Network Priority Areas has the potential to contribute to incentivising investment in heat networks, as part of a wider policy framework. Additionally, the identification of Opportunity Areas will provide significant potential for joining up energy and planning strategies, and provide infrastructure to sustain growth.

Developing and delivering heat networks requires many different stakeholders to come together. This proposal creates a welcome focus in key areas where there will be the most cost effective opportunities to deliver networks, and generates a greater expectation from all that networks will be developed. This will prove a useful signal to Local Authorities, developers and other stakeholders.

As discussed above, to reduce heat network capital costs to the level which gas, water and electricity networks are able to secure, and therefore significantly increase the investability of heat networks, arrangements are needed which address the demand risk for future heat networks – this cannot be addressed by creation of Priority Areas. However, designating such Areas and making data publically available will assist in increasing investor confidence in heat networks and in potential future demand, and as such the Association is supportive of this as a complementary policy.

User: ADE - Association for Decentralised Energy

Making best use of what’s used: waste heat and energy system management opportunities

There are major infrastructure opportunities to cut waste from the energy system that remain untapped. The ADE further welcomes the support for heat networks in the New London Plan, as networks can offer a cost-effective solution to capture waste heat alongside existing low-carbon generation such as CHP. In particular, heat networks in densely populated areas are an ideal way to collect waste heat and move it to the points of use. This cuts unnecessary energy waste, boosts security of supply and reduces emissions.

Additionally heat networks have a key role to play in supporting the Mayor’s wider ambition for decarbonisation of the energy system. The power system has increasing needs for demand and generation flexibility to move to a fully decarbonized system. Heat networks can provide a significant flexibility through thermal stores. These thermal stores enable a disconnection between heat consumption and heat generation. This allows the heat generation to respond to power system needs while still serving customers heat demand. Services can be from flexible heat pumps, CHP and electric boilers. As heat storage is cheaper than battery storage it can be a cost effective tool in system management. The revenues from system management can also help drive down the cost of heat to customers.

User: ADE - Association for Decentralised Energy

Making heat networks work for London

Due to the expertise required to deliver on the proposals included in the New London Plan, the Association anticipates that some Local Authorities would require significant support to be able to effectively apply these policies. This is particularly true in situations where Local Authorities are the owner/procurer of a heat network, in which the delivery of the network to plan requires Authorities to be very well informed from the outset. The ADE would recommend the creation of a London-specific Delivery Body, and would recommend it focus on specific key outcomes:

- Providing secondments and other forms of staff support to London boroughs to help them gain the skills necessary to invest in, develop, and operate in heat networks. This would also help mitigate any risk that a London delivery body would move skills away from the boroughs, who need them for delivery, and into a centralised team
- Providing a network for London boroughs to share knowledge and learning across different heat network development
- ?Providing support to planning authorities to help them ensure new developments best access secondary and existing heat sources and to deliver high quality district heating schemes
- Helping support London boroughs to complete successful applications for HNIP. London should set a goal that it secures its fair proportion of the HNIP money according to population
- Support local planning authorities to reduce cost of heat network extensions to existing buildings, potentially through better coordination with other civil engineering works expected, to help address the high cost of extending existing heat networks to existing buildings across roads and other public areas.

User: ADE - Association for Decentralised Energy

Response to proposals related to air quality and Combined Heat and Power (CHP)

The ADE supports the Mayor's ambition to improve the air quality in London. The Association would welcome the opportunity to work with the GLA to ensure proposals are introduced and implemented in a manner that will result in the best overall outcomes, including delivering tangible improvements and aligning with the wider 'smart' agenda.

The ADE welcomes the recognition in the New London Plan of the important role of CHP in the expansion of heat networks. The value of CHP in London's energy future is not confined to this market. As the CHP sector continues to innovate, the Association anticipates that it has a key role in delivering the objectives of the London Plan.

User: ADE - Association for Decentralised Energy

Energy hierarchy and the role of gas CHP

The Association welcomes the GLA's updated Energy Hierarchy for the London Plan. The proposed energy efficiency target for homes and non-residential buildings will help to ensure the hierarchy is delivered with an 'energy efficiency' first approach; whilst recognising cost efficiency. The Association would note that it will be important that gas CHP, as a carbon saving energy efficiency technology, continues to be clearly recognised within the hierarchy.

Gas CHP plays a significant role in reducing carbon emissions. Whatever fuel is used, CHP represents the most efficient energy generation of that fuel. CHP using natural gas saves carbon by generating heat and power up to 30% more efficiently than other thermal power stations, and by pushing higher carbon thermal power stations out of the market.

The carbon emissions factor for grid electricity can vary over the course of the day, depending on the power stations operating at each half hour. Balancing of electricity demand and supply is provided on a daily basis by thermal generators, such as coal and gas power plants. Government modelling shows that gas CHP will continue to reduce emissions even at very high penetrations of renewable and low carbon energy until the point where its power output exceeds that of other fossil fuel plant, an extremely unlikely scenario. Furthermore, those that are flexible can help address high grid carbon intensity periods.

Therefore, effectively whenever gas or coal is on the electricity system, gas CHP will continue to deliver substantial energy and carbon savings. Other forms of CHP such as waste to energy and renewable CHP can deliver even greater emissions reductions. This means that CHP will continue to provide fuel and carbon savings against the alternative generator, which will be coal and gas generation until 2025, and then gas only through the 2030s. The Government modelling also found that gas CHP will save carbon emissions far into the 2040s and beyond if it is exposed to the wholesale price, as is the case with many schemes.

The Association sees that CHP will have an important role to play in London's energy future, and should be supported as it transitions into its future market. It is crucial that policy appropriately accounts for CHP's contribution, and moves in a proportionate way to encourage innovation and best practice in the sector. The Association would be eager to work with the GLA to clarify the evidence base and precise definition of equivalence to ultra-low NOx boilers, to ensure that the baseline against which new installations will be judged is fit for purpose, in particular

where they are replacing older installations, and to ensure that abatement measures and other factors affecting air quality at street level are correctly accounted for and effective air quality improvements are implemented.

User: ADE - Association for Decentralised Energy

Recognising heat networks, including those with CHP, as an enabler for better air quality

The ADE welcomes the Mayor’s ambition to ensure that carbon targets are aligned with air quality requirements. The Association sees heat networks as a key way to help address both requirements in cost-effective ways. Whether supplied through CHP, heat pumps, waste heat or other sources, heat networks provide heat to multiple customers from a one or a limited number of energy centres. Having fewer points of heat generation enables regulators to monitor and control emissions more closely as larger and more efficient heat generators are more easily regulated, modernised, and monitored than a large number of smaller assets. This centralisation of heat generation gives policymakers greater ability to control emissions by focusing on fewer sources, allowing an easier transition to lower-carbon and lower emission technologies, such as heat pumps, over time. The ADE is encouraged to see strong recognition for the role of heat networks, including those with CHP, in the New London Plan.

User: Landsec

S13 Energy Infrastructure: We support the intent to provide energy efficient masterplans for major developments and to reduce the reliance on fossil fuels for heating. In keeping with the overall policy objective, we would recommend that major developments in Heat Priority Areas should also establish the most effective energy supply option for heating systems rather than be required to adopt a solution from a limited set of alternatives based on a prescribed hierarchy. The adoption of a communal heating system connected to a local network or centralised energy centre may not in all cases provide the most energy effective outcome. Following a rigid approach as described in the policy may drive unintended outcomes. It currently prioritises reliance on an ESCO dominated unregulated heat utility sector with limited price control and a conservative approach to the use of new technology. We would recommend that the list of options should be viewed as guidance rather than mandatory requirements and be subject to feasibility and viability tests, this will allow a greater level of flexibility to respond to grid decarbonisation and encourage new design thinking and innovation in this area.

User: Redrow Homes London Division.

The policy states that ‘Energy masterplans should be developed for large-scale development locations’. Large-scale is not defined.

This policy must both explicitly define ‘large-scale’ and be clear about what material will be required in support of a planning application and what will be sought post-permission.

Bearing in mind the extent of detailed design work which takes place post-permission, the emphasis should be on securing details by condition or obligation and not at the planning
application stage.

User:	Redrow Homes London Division.

It is agreed that London must manage heat risk, but this policy is too simplistic and idealistic. It must acknowledge the interrelationship of overheating with air quality, carbon consumption, daylight / sunlight and private amenity space.

This policy should be revisited to consider the relevant matters in a holistic manner and not topic-by-topic.

User:	Redrow Homes London Division.

This paragraph states that ‘To ensure heat networks operate efficiently, effectively and reliably, the Mayor supports standards such as the CIBSE CP1 Heat Networks: Code of Practice for the UK and the Heat Trust standard’.

Adopting such standards will increase build costs. This must be acknowledged in the London Plan given that this has implications for overall scheme viability and the capacity of a development to deliver public benefits such as affordable housing.

User:	London City Airport

Under part D, it is noted that in areas where legal air quality limits are exceeded all development proposals must provide evidence to show that any emissions related to energy generation will be equivalent or lower than those of an ultra-low NOx gas boiler. The Airport queries whether Combined Heat and Power (CHP) technologies are available to deliver emissions equivalent to an ultra-low NOx gas boiler, and would welcome clarification from the Mayor’s advisors on this matter

User: Mr Gary Hayes

Policy SI3 – Energy Infrastructure

Our greatest concern is the relationship between energy infrastructure, fuel costs and fuel poverty. There are issues around the viability of a decentralised energy network unless a critical mass of users and a range of different users are linked in in order to achieve scale, economy and balance demand and production. We are concerned that the decision to prioritise heat networks has not been grounded in an evidence based comparison with other ways of reducing greenhouse gases, particularly since new homes will be well insulated and will not require so much heat

We are also concerned about the lack of any written-in protections for heat network residents, in terms of reliability, service, or costs. There are lock-in cost implications to the consumer of a single commercial provider in any one area; essentially a monopoly, and presently an unregulated one.

We feel this policy should require that

(i) a full assessment is made in each case of costs of different alternative energy supply options, dependent on number of users and energy performance to assess whether CHP and District Networks have the potential to be the best options in terms of costs for low income households and in terms of the climate and local environmental (air quality);

(ii) there be full consideration of renewable energy options including community owned energy projects and of community owned heat networks;

(iii) residents should be fully consulted on heating options in both refurbished and regenerated schemes, and buyers should be fully informed about what they are buying into.

(iv) there should be ongoing monitoring of new schemes to ensure that what they say will be achieved is actually delivered, with information made available to residents in understandable form, and with punitive sanctions when commitments / contracts are breached, with compensation going to the end user.

User: Andrea Carey Fuller

Our greatest concern is the relationship between energy infrastructure, fuel costs and fuel poverty. There are issues around the viability of a decentralised energy network unless a critical mass of users and a range of different users are linked in in order to achieve scale, economy and balance demand and production. We are concerned that the decision to prioritise heat networks has not been grounded in an evidence based comparison with other ways of reducing greenhouse gases, particularly since new homes will be well insulated and will not require so much heat

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We feel this policy should require that

1. a full assessment is made in each case of costs of different alternative energy supply options, dependent on number of users and energy performance to assess whether CHP and District Networks have the potential to be the best options in terms of costs for low income households and in terms of the climate and local environmental (air quality);
2. there be full consideration of renewable energy options including community owned energy projects and of community owned heat networks;
3. residents should be fully consulted on heating options in both refurbished and regenerated schemes, and buyers should be fully informed about what they are buying into.
4. there should be ongoing monitoring of new schemes to ensure that what they say will be achieved is actually delivered, with information made available to residents in understandable form, and with punitive sanctions when commitments / contracts are breached, with compensation going to the end user.

User:	Cross River Partnership

Undoubtedly, this Policy is welcome. However, it fails properly to recognise that major difficulties also arise with the energy utility companies. This is partly because of the policies followed by the latter, but more significantly because of the regulatory regime governing how they are allowed to respond to new developments, as envisaged here. There is a mention of this in para. 9.3.8 (p 333), but this point needs to be recognised more clearly in the Policy itself. It is quite likely that, to achieve the Policy's objectives, changes to the regulatory regime may be required.

User: L&Q

Energy masterplans

The policy states that ‘Energy masterplans should be developed for large-scale development locations’. Largescale is not defined.

This policy must both explicitly define ‘large-scale’ and be clear about what material will be required in support of a planning application and what will be sought post-permission. Bearing in mind the extent of detailed design work which takes place post-permission, the emphasis should be on securing details by condition or obligation and not at the planning application stage.

User: L&Q

CIBSE standards

This paragraph states that ‘To ensure heat networks operate efficiently, effectively and reliably, the Mayor supports standards such as the CIBSE CP1 Heat Networks: Code of Practice for the UK and the Heat Trust standard’.

Adopting such standards will increase build costs. This must be acknowledged in the London Plan given that this has implications for overall scheme viability and the capacity of a development to deliver public benefits such as affordable housing.

User: CIBSE

SI3 – B - 4 and 9.3.7 - Energy from waste

We agree that waste-to-heat schemes may be an appropriate option in some cases, in some locations and for some types of waste streams. However, this should only be after other waste management options following the circular economy principles have been explored. While using heat from existing plants may be appropriate, new waste-to-heat plants should only be proposed with much caution; not only could they jeopardise the objective of policy SI1 of Improving Air Quality, they would also contradict the objective of SI7 of Supporting the Circular Economy, and create a financial dis-incentive for local authorities and private waste management companies to improve recycling rates.

In any case, we do not agree that heat from waste should be classified as a renewable energy, as is currently stated in 9.3.7. Waste-to-heat plants should we treated in a similar way to boilers and CHP plant, with scrutiny over their air quality impact.

User: CIBSE

SI3-D Heating hierarchy

Implementing or connecting to heat networks should be linked to carbon savings, not as an end in itself.

- In some cases, for example where loads have been reduced substantially through passive design, energy efficiency, and demand management, the implementation of a heat network would not offer carbon savings. Policy should accommodate and encourage this, provided it is robustly demonstrated
- by applicants.
- We would recommend swapping 1a) and 1b) in the hierarchy, i.e. giving local heat sources priority over networks, especially if those are planned rather than existing networks. Local heat sources should also include energy sharing loops.
- In the case of connecting to existing networks, the network should be demonstrated to operate efficiently, offer carbon savings, have a zero-carbon and zero-emissions transition plan, and be of reasonable running costs to occupiers. Should the existing network not operate efficiently, connection to the new development should only be considered if it is demonstrated that measures are being taken to rectify it and offer carbon savings to the new development, or if connecting the development would allow it to operate more efficiently and offer carbon savings to the new development e.g. if the new development provides a heat load that helps balance the network's operation.
- Networks should wherever possible be constructed in accordance with the industry standard practice described in CIBSE CP1, Code of Practice for district heating networks. This is essential to avoid long term lock in to sub-standard underperforming networks which can have a lifetime well in excess of 50 years.

User: London Borough of Ealing

Energy Infrastructure
(SI3 A)

How are ‘large-scale development proposals’ defined?

Energy Infrastructure
(SI3 A)

This policy requirement may require the intervention of the GLA to drive it forward as from experience it can be very challenging for the LPAs to bring developers together to agree on large scale heat networks. Persuading developers to look beyond their own site can be difficult. Further guidance on how this can be delivered should be included.

The establishment of a developers’ forum for each Opportunity Area, Town Centres, other growth areas or clusters of significant new development should be required by the GLA. The requirement for a forum can assist with the development of large scale heat networks. It also save considerable officer in attempting to co-ordinate such dialogue and will assist us in understanding better the constraints/barriers to implementation.

User:	London Borough of Ealing

Energy Infrastructure (SI3 B)

Again as above how are ‘large-scale development proposals’ defined?

Energy Infrastructure (SI3 B)

The findings from energy masterplans should be uploaded to the London Heat Map. An appropriate condition can be applied in planning applications to require developers to upload data in the London Heat Map.

User: London Borough of Ealing

Energy Infrastructure (SI3 B & C & 9.3.11)

Introducing the requirement for a developers' forum in the policy, with the involvement of the GLA and LPA, should assist in creating some common ground amongst developers. In addition, the responsibility for developing energy masterplans should be placed on the developers, and this should be clearly stated within the policy.

The requirement for a developers' forum will also assist with the development of energy masterplans as these will be required to present compliance with the policies.

In this way developers are encouraged/compelled to engage from an early stage whilst also potentially benefitting them through sharing costs for appointing individual energy experts and GLA and LPAs costs on officers' time, procurement etc. This will also assist with identifying potential necessary energy infrastructure requirements including upgrades to existing infrastructure.

User: London Borough of Ealing

Energy Infrastructure (SI3 D.1.d)

Fuel cells are not a mature technology. How will emission savings be measured and quantified in line with policy SI2?

Energy Infrastructure (SI3 D.1.f)

A definition should be provided if individual gas boilers are proposed here. In addition it might also be useful to set a threshold for what size of developments this option would be appropriate for.

User: London Borough of Ealing

Energy Infrastructure (SI3 D.2)

The Council supports this policy. However, additional guidance on what information the applicant is expected to submit as part of the proposals should be outlined (perhaps in separate guidance document).

User: London Borough of Ealing

Energy Infrastructure(SI3 D.3)

How does the GLA plan to require developers to future proof their developments? Most developers in areas which have been identified as having potential for area wide networks typically still propose their own onsite solution even though they also future proof their developments.

However, technologies proposed have a life span of 15 years or more which carries risks in terms of the actual delivery of the area wide network. It would be better if this policy was worded ‘should be designed for connection at later stage in the form of an interim solution’.

User:	London Borough of Ealing

Energy Infrastructure (SI3 9.3.8)

This paragraph should also advise that grid electric proposals will not be supported.

User: UK Power Networks

Performance

We develop the network by producing and maintaining regional development plans. We do this to ensure the network is developed in the most efficient manner, in order to comply with our statutory obligations as a Distribution Network Operator (DNO). The RIIO-ED1 price control framework as set by the regulator Ofgem is comprehensive, reflecting customers' expectations through a robust package of incentives and protecting their interests with uncertainty mechanisms. This framework, along with previous price controls, has facilitated the delivery of significant improvements in the quality of service customers receive at lower cost.

Our performance in London has been strong, over the past four years we have seen a 23% reduction in power cuts and a 33% reduction in their duration thanks to our investment in network resilience. Additionally, customer satisfaction is at its highest level of 86%, comparable with the likes of Amazon and John Lewis, widely recognised as delivering frontier customer service. We have done this all whilst reducing customers bills, and our London network is the lowest cost distribution network in Great Britain. At just 18p a day, it is 25% lower than the national average.

We note your specific point on ensuring that electricity infrastructure is capable of meeting the increased demands as a result of London's growing population, economy and the decarbonisation of both transport and heating sectors:

"It is of concern that the electricity network and substations are at or near to capacity in a number of areas, especially in central London. The Mayor will work with the electricity industry, boroughs and developers to ensure that appropriate infrastructure is in place to meet London's needs. Energy masterplans are expected to identify any necessary electricity infrastructure."

We recognise that changes are coming and that there are challenges associated with increased demand. As London transitions to a zero-carbon smart city, UK Power Networks needs to ensure it is not a barrier to this clean growth but at the same time ensure costs for existing and connecting customers remain affordable. We plan to do this by advancing innovation and our ability to maximise utilisation of the existing network infrastructure in the first instance (see Innovation section for further details).

When innovation alone cannot meet the applicable requirements, we look to use more traditional reinforcement solutions for our networks. The RIIO framework does not allow capacity to be delivered ‘ahead of need’ as this can result in inefficient spending and cause higher than necessary costs for consumers. Instead, the RIIO framework, supported with our development strategies, ensure that a ‘just in time’ approach is taken to ensure new capacity is unlocked when required. If we were to have all the capacity required until 2050 now, our network would not be as efficient, and customer bills would be significantly higher. We have comprehensive plans to ensure we are managing our network in the most efficient and effective way possible.

As part of our plans to increase capacity to meet the future demand for power in London when it is required, we are reinforcing the network in areas such as Osborn St; Limeburner Lane; Eltham; Finsbury Circus; Backhill, Fisher Street, Wimbledon, St Pancras, Wandsworth & Southbank along with supporting Crossrail and the development of Wood Wharf with new substations at the Limmo Penninsula and Blackwall Way. In central London, together with partners we are delivering four new substations, located where demand is expected to rise over the coming years. These new substations will be vital in providing an extra 300MVA of capacity (equivalent to nearly six Olympic Parks).

Details on these sites can be found below, with further information within our Central London Plan1.

Calshot Way (also known as Grafton Way)
Capacity: 86MVA **Complete**: May 2018 **Cost**: £10.4m
Grafton Way is a part of our City Road/City of London Regional Development Plan. The plan is to build a new substation in the Kings Cross area that will provide an increase in capacity of 86 MVA. This extra capacity will allow load to be transferred from the nearby Back Hill substation.

Vauxhall, Nine Elms, Battersea (also known as Stewart’s Road)
Capacity: 86MVA **Complete**: 2019 **Cost**: £29.4m
We proposed the building of a new substation to facilitate the development of new planning proposals in the Vauxhall, Nine Elms and Battersea areas on the south bank of the Thames.
This substation will facilitate:
? 16,000 new homes;
? An extension to the London Underground Northern Line; and
? Regeneration of Battersea Power Station

White City (also known as Wood Lane)
Capacity: 43MVA **Complete**: 2020 **Cost**: £16.1m

The London Borough of Hammersmith and Fulham and the Greater London Authority have agreed a new White City Development, with mixed office, residential and community use. The site is close to the BBC Television Centre and Westfield shopping centre and a new substation in the White City area was proposed to support this new development.

West End
Capacity: 86MVA **Complete**: Mid 2020s **Cost**: £36.5m
London's West End is one of the most economically important areas of London. It encompasses the entertainment districts of Leicester Square and Covent Garden, as well as shopping districts on Oxford Street, Regent Street and Bond Street. Three substations that supply this area are expected to exceed their current capacity and hence we are developing plans to construct this new substation.

User: UK Power Networks

Innovation is at the heart of our vision. We innovate in order to make our service more reliable, more affordable, cleaner and safer. Our three overarching objectives are well aligned with the ambitions set out by the Mayor of London in the London Plan:

- Efficient and effective: we aim to provide a safer, more reliable and cost-efficient supply by delivering our committed outputs in RIIO-ED1 at the lowest cost to customers, and by improving safety and reliability of the network by reducing the number of interruptions and their duration through automation alongside modern monitoring and control techniques.
- Low carbon ready: we aim to facilitate a low carbon system by improving network access through reducing time and cost to connect low carbon technologies (be they demand, generation, and storage) using innovative solutions and flexible service offerings.
- Future ready: we aim to be a future-ready distribution business providing new services, which meet the needs of tomorrow’s customers.

Through the wide spectrum of our projects we are gaining invaluable learning on low carbon technologies, smart solutions and decentralised flexible energy systems that will support the transition of London to become a world-leading zero-carbon smart city by 2050.

We believe there is useful learning from our projects that could be applicable to the wider market. This information could be used to inform all aspects of policy, whether that is transport or environmental, through to all aspects of the energy hierarchy and feed into borough energy strategies. Examples of our innovation projects that demonstrate strong synergies with the London Plan are included below and we would be happy to discuss these and share further learning with you or your team if this is beneficial.

User: UK Power Networks

Electrification of Transport (numerous projects)

We have numerous projects that promote and facilitate the decarbonisation of transport including:

- Black Cab Green
- Smart Electric Urban Logistics (SEUL – UPS Delivery)
- Recharge the future

More information can be found in the Transport section to this response and in our response to your Transport Strategy consultation dated 2 October 2017. The projects have strong alignment and support to key policies within the Transport and Sustainable Infrastructure sections to the London Plan. They serve to demonstrate how UK Power Networks is testing smart technologies and new commercial arrangements to facilitate the uptake of electric vehicles (EVs) and improve air quality while deferring where possible expensive network reinforcement and keeping costs down for our customers.

User: UK Power Networks

Low Carbon London (LCL) & energywise

We have undertaken pioneering innovation projects that investigated and concluded that reduction in demand on our networks from customers can be derived through energy efficiency projects. Our Low Carbon London4 project trialled and demonstrated a broad range of potential smarter approaches to how DNOs may invest and operate in the future. High level summaries are supplied below, but more detail is available on our website.

· Energy efficiency and smart meters: specifically looked at minimising energy demand and observing whether the issuing of smart meters can support energy efficiency behavioural change. Through this, and other initiatives, we assessed the opportunity and impact of energy efficiency, with findings published in the report ‘Network impacts of energy efficiency at scale’. A key finding estimated that up 10TWh of consumption savings could be achieved by 2020 by switching to more efficient appliances.

· Smart tariffs and Demand Side Response: We conducted an extensive, first of its kind, dynamic time of use tariff with over 1,100 customers in our London area, observing clear and strong support for flexibility-oriented tariffs.

· Electric vehicles and heat pumps: Using empirical data derived by monitoring a substantial number of electric vehicles (EVs) and heat pumps (HPs) and examining the impact on networks in London. The main findings are summarised in the LCL Report B26, providing recommendations as to how to incorporate the impact of EV and HP loads on a distribution network into forecasting, connections, planning and demand monitoring processes. Trial data showed that there was only a minor effect on load profiles derived from heat pumps, however it was still significant and twice the expected contribution from EV charging.

Additionally, our ‘energywise’ project involves providing energy efficiency measures, free of charge, to social housing tenants from Tower Hamlets to explore how low income households who may be struggling with fuel bills can better manage their household usage. It was the first Low Carbon Networks Fund project specifically looking to address the series of issue of fuel poverty. It involves two trials; the first of which was focused on energy saving. The second trial is on time of use tariffs and is still ongoing, as such final findings are not yet available.

Findings from the first trial demonstrated that an estimated total annual reduction in electricity consumption of 56GWh could be achieved across our three licence areas. This corresponds to an average reduction in the evening network load of approximately 14MW (enough to power approximately 7000 electric kettles). These reductions in load can benefit the customer's bill on two fronts, directly, through reduced energy usage, and indirectly, as the reduced load could remove the need or defer network reinforcement, thereby reducing the cost of the network operator and in turn lowering customer bills.

Just as important as having distinct engagement strategies, it is also paramount that other groups e.g. homeowners, landlords etc (whilst noting being potentially easier to target) are not prioritised over those perceived more 'challenging' demographics. Efficiency needs to be driven and planned for all parts of society. Our experience on energywise demonstrates the importance of engaging with households who may initially be less open to investing in energy efficiency.

User: UK Power Networks

Domestic Energy Storage and Control (DESC)8

The aim of the project is to understand the impact and opportunities for distribution networks from high uptake of domestic energy storage, particularly when combined with small-scale embedded generation such as solar PV. To achieve this we have successfully recruited 70 participants (most of which are in the London area) with solar panels and in collaboration with domestic storage manufacturers and suppliers (Powervault, Sonnen and Tesla) we have installed domestic batteries of different makes and sizes.

We are now collecting 12 months' of data on how much energy is generated, stored and transferred to the grid by the participants. We are also carrying out a series of control trials to understand whether customers could offer flexibility services, such as demand side response, by allowing network operators such as ourselves to use energy stored in customers' batteries in times of high demand.

These services will be an enabler for the transition of DNOs to Distribution System Operators (DSOs) and will ensure that we can continue to reliably keep the lights on whilst enabling the connection of low carbon technologies, such as EVs, on our networks at the lowest possible cost.

DESC will also help our understanding into how customers can benefit from generating their own energy, storing it and then either using to help support network operations (unlocking a new revenue stream) or consuming it for their own needs (i.e. saving on energy bills).

Early findings to date have demonstrated that domestic battery storage coupled with solar PV installations can increase customers' self-consumption, saving them money on their energy bills (energy saved by each customer within 11 months was enough to power a typical UK household for 85 days). This also helps with managing high demand on networks by eliminating peaks and driving the demand down (for 60% of the days in June, customers were self-sufficient).

User: UK Power Networks

Powerful-CB9

Powerful-CB is an Ofgem Network Innovation Competition project to tackle fault level constraints across our networks, with a focus on overcoming specific challenges in the dense urban London network. By trialling these technologies, we are acting to enable CHP connections and contributing to the Mayor of London’s target to generate 25% of London’s heat and power requirements locally by 2025.

Fault level constraints can impact the connection of distributed generation due to low fault level headroom in substations. Through the project we are developing and trialling two new fault-limiting circuit breakers that are significantly smaller and more efficient than any similar device currently in use. The project aims to make it quicker and cheaper for distributed generation, especially Combined Heat & Power (CHP) units, to connect to the network. Using advanced power electronics, this high-speed protection will allow hundreds of megawatts of low-carbon electricity sources the ability to connect to our network more safely and cheaply.

The devices will be installed in 2019 with the trial running for two years and we have and will continue to publish our learnings from these devices.

Additionally, when planning local energy strategies that include heat recovery and secondary heat sources, it is important to take into account the challenges associated with the implementation of heat recovery techniques. For instance, heat quality can be a challenge in real applications, with our own assets, the distribution network runs with a level of resilience and as such the heat quality is not consistent, often not of general quality and therefore not economically efficient to capture.

User:	UK Power Networks

Active Response

Active Response, will trial a responsive, automated electricity network that reconfigures itself constantly, moving spare capacity to where the demand is. It does this by using power electronics to move electricity from heavily loaded substations to nearby substations with spare capacity.

Active Response will be the first time that electricity networks can move spare capacity around the system to support areas that are using more electricity. This means providing additional capacity in residential areas in evenings and at weekends when people are charging their cars, and then moving that spare capacity to where it is needed during the day – such as city centres, commercial hubs or electric fleet charge points.

Upgrading an electricity substation, or adding entirely new substations and cabling when customers need more power, takes time, costs money, and causes roadworks. Instead, Active Response could use these power sharing techniques to connect new customers, and those requesting more power, quicker and at lower cost.

It is estimated that Active Response could save customers nationwide £271million by 2030 and cut more than 448,000 tonnes of carbon emissions by 2030, which is the same as almost half a million return flights between London and New York.

User: UK Power Networks

Our response to your Transport Strategy provides additional detail to our views on the decarbonisation of transport, but some of the key considerations that will help facilitate the transition to increased EV use are highlighted below:

? Early engagement: We encourage early engagement from the GLA, TfL, local authorities, fleet operators and customers with significant EV charging requirements. They should give careful consideration to the power supply and network infrastructure requirements early in their plans and we are committed to support them through this process.

? Visibility and notification: Visibility and notification of EV charge point installations enables more efficient planning and management of our networks, this is most crucial to low voltage networks where monitoring is less extensive. Electricity network operators have established an EV charge point installation notification process17 with the Electricity Networks Association (ENA) that currently captures data on the location and rating of charge points. This is largely a voluntary process and would be further improved by policy changes encouraging compulsory notification to the DNO. We consider the following as the minimum data fields that should be included in any future standardised format of data collection:
o Static data – location of charge point, number of sockets, rated power (kW) per socket, mode of charge (AC/DC), smart functionality e.g. stop charge, vary charge rate; and
o Dynamic data – charge rate and charging status.

? Standards: Standards are particularly important to ensure that customers have safe and secure smart functionality designed into a charging system that is also open, interoperable and scalable. Standards should be designed to allow consistent interaction and information exchange between the smart charge point and electricity network management systems as well as protection from cyber-attacks.

Building on existing initiatives, we believe the following steps would further help the adoption of EV’s and we welcome the opportunity to work together in supporting you advancing the following activities:

- Infrastructure stakeholder collaboration: Facilitating forum with key infrastructure stakeholders to ensure standardisation and interoperability of charge points.
- Communications: Publicising existing initiatives and alleviating concerns for drivers and fleet operators looking to electrify is a key element in advancing growth.

- Guidance: Providing more support and guidance18 to industry stakeholders including local authorities in the installation of public and private charge points.
- Smart Charging: Promoting measures being outlined as part of the Electric and Autonomous Vehicle bill, in particular requirement for Smart Charging. Smart Charging infrastructure will be important in enabling customers to charge their vehicles, by maximising the utilisation of existing network capacity and minimising the requirements and costs of reinforcing the electricity network.

User: UK Power Networks

We support your vision to transform London into a greener and more pleasant city for its population. We recognise that air pollution is an important issue in London and that it is imperative that measures are implemented to rapidly reduce nitrogen oxides and particulate matter emissions that are harmful to human health. The aims in the London Plan provide sensible steps to achieving improved accessibility to cleaner public transport and we will endeavour to support in enabling these through our work promoting and facilitating the decarbonisation of transport highlighted in the above section.

Delivering Clean, Smart, Flexible Power

The nation's journey to a low carbon economy is revolutionising the way we produce, distribute and consume electricity. We have experienced these changes first hand and we have seen how our customers, motivated by efficiencies, new technologies, and government policies, can drive radical changes such as the sudden and widespread connection of renewable generation to our networks.

Over the past three years, the UK has seen the connection of 12GW of solar generation and 16GW of wind capacity – sufficient to exceed consumer demand at certain times in summer. The distribution networks are at the forefront of enabling these changes; 90% of the solar energy alone connects directly to the local distribution networks. Renewable energy installations, such as wind and solar farms, are on the rise and we are proud to have enabled 9GW of distributed generation to connect to our networks; a third of the UK total and around three times the capacity of Hinkley Point C power station.

The pace and scale of these changes in our industry is increasing. In the last two years, large-scale storage has emerged with advancements in electricity storage technology. To date we have over 61MW of storage connected to our networks with a further 1.3GW of storage with quotations accepted and storage enquiries for a total of 24GW. At the same time, we are starting to see the pickup of EVs and the national roll out of smart meters. The electricity system needs to enable these technologies and to do this it has to change.

To continue to support the low carbon transition in a safe and cost-effective way our role will continue to evolve. Instead of acting as the passive manager of a network of cables and assets connecting centralised generators to homes and businesses, we are transitioning to become an active manager of a system that enables local communities, renewable generation, small and medium sized businesses, prosumers and consumers to access the energy and flexibility markets, all whilst making sure the lights stay on. This transition from a passive network manager to one providing active, market-focused services for our customers requires a transformation of our business to meet the requirements of this new role; that of a DSO.

User: UK Power Networks

Flexible Distributed Generation

Flexible Distributed Generation (FDG) connections allows distributed generation (DG), (e.g. solar and wind) with a cheaper and quicker point of connection to the existing network without the need for/or ahead of reinforcement. Previously, if a DG connection required network reinforcement, the cost of this reinforcement would have to be met by the generator owner, providing a substantial barrier to many DG projects getting off the ground. The FDG connection offering was developed as part of our research demonstration project, Flexible Plug and Play (FPP20), to facilitate the connection of DG in areas of network congestion without the need for the customer to pay high connection costs. This connection is in return for the ability for us to control their output in times of high network load.

The FDG connection is enabled by the Active Network Management system (ANM), a software automation product that monitors the network in real-time and automatically controls the output of participating generators. The ANM is designed to ensure safety of the public, our employees and the network infrastructure and as such it delivers fail-safe instructions if it detects abnormal operation of any of overall system components including the generators. As a result of the FDG schemes there are currently 23 generators operational, having saved over £70m in connection costs. Without FDG these projects that would not otherwise have been developed and further demonstrates how we are an enabler to clean, smart and flexible power.

Flexibility Tenders

We are actively seeking to contract with flexible energy resources to support delivery of cost-effective investment and smart management of the distribution network. Whereas FDG (mentioned above) is flexibility via the connection agreement, this solution refers to flexibility deployed through a bilateral contract between us and distributed energy resources such as generation, DSR, and storage.

The flexible capacity such contracts provide will be used to manage uncertainty over when network investment is required as well as supporting network operations. The locations with potential for deployment of flexibility was published to industry in August 2017 and a competitive tender published in October 2017 to procure flexibility services over the next couple of winters.

The new flexibility services contracts are expected to have three key benefits:

- A new way for electricity generators, storage, major consumption users and aggregators to offer their resources to create additional income;
- More efficient use of the existing network infrastructure and connected resources will mean lower electricity distribution costs for customers; and
- Help ensure an even more resilient electricity supply.

We believe this strategy will be key to playing our role in facilitating the £17-40bn of wider system benefits which Ofgem and BEIS cite as attainable through smarter, more flexible use of the energy system.21

Our innovative projects, transitioning to business as usual smart grid solutions and the resulting connection of renewables has helped reduce the carbon factor for electricity in the UK. This, as reported in the ‘UK Government GHG Conversion Factors for Company Reporting22’ has gone from 0.46219kg CO2e per kWh in 2015 to 0.35156kg CO2e per kWh in August 2017, a 24% reduction. This reduction in Business Carbon Footprint is a benefit passed to everybody.

User: UK Power Networks

We have a long-established and ongoing programme to identify property surplus to current and future operational requirements to meet existing and predicted load demands with surplus land released to the open market via a sale or letting arrangement. In addition, a submission is made to our regulator (Ofgem) who must be satisfied that customers' interests will not be compromised by the disposal.

These assets are available for acquisition by third parties for a variety of different uses including storage, industrial, residential, or commercial redevelopment. Where appropriate, proceeds from the sale are used to finance the enabling works, such as the relocation/renewal/consolidation of operational equipment and site separation. As well as contributing to the integrity of the network, the security of electrical equipment, ease of access for maintenance and helping to reduce ongoing maintenance/health & safety costs, these enabling works often result in visual improvements and noise abatement in the immediate environment.

The Asset Optimisation Programme provides benefits for customers on many fronts, all of which can be traced back to supporting polices with the London Plan:

- Removal of surplus assets results in a more efficient operation of our network, resulting in lower costs and hence lower bills for customers.
- Our regulatory framework stipulates that any returns from the proceeds of a sale are shared with customers (47%), resulting in again, lower bills for customers.
- Sale/reconfiguration of land presents the option to develop new residential and industrial usage helping to facilitate growth and maximising use of land.

User: Taylor Wimpey UK

Policy SI3 Energy Infrastructure

Specifying Heat Priority Areas must provide communal heating systems takes away neutrality in terms of how regulatory requirements and policy targets are met. It may advance the interests of the producers of particular technologies but deny developers the choice of the best technologies to adopt.

While we support moves towards a low carbon future we are concerned about the use of some district heating technologies in circumstances:

- We are concerned that customers may be trapped into expensive communal heating schemes with long term and expensive maintenance requirements.
- It is not clear the customer has any benefit on their energy bills
- The public has a right to switch supplier which is denied
- As the fabric of buildings become increasingly efficient the benefits of shared heat reduces
- The capital costs can be high and it is often not clear that district heating is a cost-effective solution compared to some alternatives
- Some technologies (e.g. gas fired) may be low carbon today but may lock us into a higher carbon future over their lifetime

User: Scotia Gas Networks

We are concerned that the draft London Plan sets a different tone for our sites. Policy 5.22 is deleted. Much of the supporting text supporting decommissioning has been deleted. Paragraph 5.31H of the adopted London Plan is reworded as paragraph 9.3.10 albeit without reference to new homes and jobs and the significant potential that our sites can offer.

Notwithstanding this we do broadly welcome the new approach that the draft London Plan takes to former gas holder sites encompassing them within the broader heading “surplus utility sites”. We feel that with some additional clarifications, to draw out the underlying policy approach and the evidence base supporting policy, our concerns will be sufficiently addressed. We set out our proposed revisions at the end of this submission.

User: Scotia Gas Networks

Delete last paragraph 9.3.10 of Draft London Plan

Paragraph 9.3.10 – new text

“National Grid and Southern Gas Networks operate London’s gas distribution network. Both companies are implementing significant gasholder de-commissioning programmes, replacing them with smaller gas pressure reduction stations. The Mayor will work with key stakeholders including the Health and Safety Executive to achieve the release of the resulting brownfield sites for redevelopment and will prioritise de-commissioning of those surplus gasholder sites which have significant potential to contribute to the provision of new homes and jobs on and around them. Planning guidance for hazardous installations should ensure that land use allocations for hazardous installations take account of the need to incentivise and fund decommissioning. Land contamination can constrain the future of such land: decontamination works are costly and can require the incentive of higher land values (e.g. from residential developments)”

For clarity and to reflect existing text within the evidence base to the draft London Plan

User: Heat Trust

Supporting delivery of well designed heat networks under the New London Plan

In London communal and district heating networks are managed by different types of operator, from local authorities and housing associations to energy service companies (ESCOs) and private housing developers. Furthermore, the roles and responsibilities for parties involved in the delivery and on-going operation will often vary from heat network to heat network.

Overtime, this has resulted in a lack of consistency in industry-wide customer service and technical performance standards. In addition, as a single energy provider is responsible for the provision of heat and hot water to customers served by the heat network, customers cannot choose their heat supplier. If customers do not receive a good level of service, due to poor customer experience or technical performance of the network, customer acceptance and willingness to live on heat networks will be undermined.

The draft new London Plan and draft Environment Strategy sets out ambitions for Heat Network Priority Areas where heat demand is sufficient to establish a viable heat network. We support the approach set out in the draft New London Plan which requires developments to make use of the heating hierarchy, to ensure heat networks are appropriately sited.

The draft Environment Strategy proposes that a new Heat Network Delivery Body is created to provide more direction on how heat networks are developed. Should the GLA introduce a Heat Network Delivery Body for heat networks, we believe the Delivery Body will have an important role in ensuring heat network projects meet customer service and technical performance standards.
We pleased that the draft New London Plan recognises and supports the role of existing standards, like Heat Trust. With a dedicated customer protection scheme in place, it is vital to avoid duplication of standards and codes which may result in increased costs and create a two-tier system. We would urge the GLA to utilise and build on existing industry standards and avoid unnecessary overlap that would undermine the principle of creating consistent industry standards within the heat network market.

The simplest way to achieve this would be for the draft New London Plan and any future accompanying design guidance, to set Heat Trust has a standard to be met for heat networks in London. This would:

- Ensure customers receive consistent and robust customer service standards;
- Ensure customers can access the independent Energy Ombudsman;

- Require heat suppliers to provide guaranteed service payments to customers when a heat supplier fails to meet their obligation to restore supply within a specified timeframe;
- Require heat suppliers to provide additional support for vulnerable customers; and
- Ensure all heat networks are monitored and independently audited.

User:	London Sustainability Exchange
Heat Network priority areas: These maps are from an infrastructure mapping application –a live app that all developers should know and use – this should be made clear to developers and the should be referred to it.	

User:	London Sustainability Exchange

Comment: There is no mention of infrastructure investment in technology and data. For example, IoT (Internet of Things) and Smart City Solutions are initiatives being implemented by other cities to optimise energy, transportation and logistics among others.

User:	London Sustainability Exchange

Gas meets 90% of London’s heating demand. “Shifting from gas” is unrealistic without an appropriate timeframe or alternative energy provisions available. Moreover, the gas infrastructure upgrade currently taking place will allow for ‘gas blends’ and hydrogen to be transported. This should be taken account of.

User:	London Sustainability Exchange

The useful tool in the link above [London Heat Map] gives data on policy indicators (such as social density fuel poverty rates etc.) yet the map only focusses on heat network priority areas & how London can satisfy future heat demand based on existing demand. Like in the Water Infrastructure chapter (9.5.7) there needs to be a proposal somewhere that mentions the measures required to alleviate fuel poverty (alongside future developments in infrastructure.) This is supported by our LES consultation.

User:	London Sustainability Exchange

This does not specify what land or an existing policy/plan that is ensuring energy storage. Potential future risk on building these on the green belt.

User: Persimmon Homes

Part D is unsound because it is unjustified.

We object to the requirement for developments with Heat Priority Areas to include communal heating systems. As detailed above, Planning policy should not dictate how Part L of the Building Regulations and policy targets are achieved. The approach is unduly prescriptive, will add to the complexity, regulatory burden and cost which will impact much needed housing delivery.

It is considered that part D should be deleted as it is unjustified. Furthermore, it is unnecessary as under part B of the Policy as 'Energy Masterplans' should be
produced where necessary and established the optimal supply option/

We share the HBF concerns that communal heating schemes limit consumer choice in terms of energy supplier. Communal systems give rise to an ongoing financial liability which will add to cost of service charges, reducing affordability.

We recommend that part D is deleted and that the consideration of appropriate technologies is a matter for the developer unless there is an adopted Energy
Masterplan which has considered and can justify why there is an optimal supply option that does not prejudice development.

User: Alex Page

I support the ambition for London to become a zero carbon city, however this needs to be achieved sooner than 2050 if we are to meet our global commitments to tackle climate change. To do this, London needs to rapidly embrace renewable energy, including solar. The London Plan should include a clear policy to facilitate, support and promote the uptake of solar energy.

This could be achieved by adding a strong policy on solar energy (using wording in supporting text 9.2.3), by mentioning renewable energy infrastructure including solar technologies in Policy S13, and by requiring all new homes to be zero carbon.

User:	London Borough of Camden

The Council welcomes the Mayor’s commitment to continue the existing approach in relation to securing energy infrastructure.

Within the context of evidence published recently regarding the increased decarbonisation of the national grid, we welcome that criterion D places CHP lower down the hierarchy of preferred communal heating systems. Camden believes that non-CHP-led district energy networks could suffer in uptake due to lesser commercial viability and requests further guidance on balancing the twin priorities of growing district energy networks whilst minimising the air quality impacts of CHP.

User: Siemens

2.3 Climate Change Mitigation and Energy

We support London's goal to reach zero carbon by 2050. As a company, Siemens feels very strongly about reducing the environmental impact and we have committed to be carbon neutral by 2030 with a 50% reduction by 2020.

Siemens has developed a tool called the City Performance Tool to help cities in prioritising investment in building, energy and transport infrastructure by demonstrating the impact on CO2, Air Quality and additional job creation. The initial findings for London suggest that home automation will provide the greatest opportunity to improve energy efficiency of buildings and thus reduce CO2 and this could be considered along with the schemes to improve building insulation.

The LES supports the installation of smart meters in residential buildings in order to raise awareness of energy usage. In order to drive real reductions in energy use the GLA should define how they want to use data from smart meters; advocating for the rollout of smart meters is not enough to change people's energy usage or their interest in the matter. Having a clear idea from the beginning would also make feedback to design better smart meters possible. It is acknowledged that installations for smart meters are behind plan but the strategy gives no insight to how roll-out could be sped up in the future.

The strategy further acknowledges that household boiler systems need to be replaced, it does not however specify with what alternative. Some clarification around what new energy sources will be adopted would help clarify how the GLA will achieve their goals up to 2050.

As the climate does continue to change, the city should also consider how cooling buildings will impact London's energy usage; as temperatures continue to rise globally, how do we ensure that the process for cooling buildings is as efficient as possible? Siemens' Crystal Building demonstrates an example of using smart, digital technology to regulate temperature in an energy efficient manner.

The GLA should raise awareness of issues such as climate change and air quality among businesses in London and perhaps set targets for them to reach. Competitions, or publishing data publicly are effective tools to raise awareness and motivate the private sector to reach environmental targets. In addition this could also be leveraged to direct investment into energy efficient building and retrofitting.

In the process of finding new solutions in energy efficiency, building efficiency, data collection and usage, and finding new ways to direct financial investment, cities need to share this new knowledge.

Good examples taking place in London already include:
• Sharing Cities: The EU Horizon 2020 Smart Cities and Communities funded programme supports new smart city technologies to maximise their benefit for Londoners and demonstrates that they can be repeated throughout Europe. More can be found on the website http://www.sharingcities.eu/.
• The Crystal: located in the Royal Docks, the Crystal is one of the world's most sustainable buildings, home to the world's largest permanent exhibition on the future of cities and demonstrates in a very real way a corporate commitment to sustainability. More can be found here.

Siemens has noted the accelerating trend towards energy systems being decentralised, and controlled at a local level and, in response to that we have established a new Centre of Competence for Distributed Energy Systems (DES). This aims to work in partnership with cities, local authorities, developers, industrialists, campuses or other energy generators or users, to promote the provision of secure, low-carbon, affordable energy.

Decarbonisation of heat is one of the key challenges that needs to be addressed, as we work together to combat the threat of climate change, and there are a variety of ways in which DES can help cities address that challenge. Combined Heat and Power plants, linked wherever appropriate to District Heating Systems, are among the more promising options for the decarbonisation of heat, and as technologies and techniques develop further we will be working to identify how such approaches can be adopted for existing buildings as well as for new developments.

In parallel with this, we see a clear trend for deployment of renewable energy generation sources as part of Distributed Energy Systems, with clear sustainability benefits. However, for these technologies to be harnessed as fully as possible, we need to make effective use of battery storage systems, and other smart control techniques such as Demand Response Management and Virtual Power Plants. In particular the use of energy storage not only maximises the use of renewables and increase security, but is a key component in community energy systems enabling generators to become prosumers and sell their excess power. All of these technologies are being developed and deployed as part of Siemens DES commitment, and these are seen as essential elements of the Smart Cities of the future.

User:	Siemens

2.5 Adapting to Climate Change

There is immense opportunity for the GLA to leverage data collection when considering how the city will adapt to climate change; sound data collection and analysis will help Londoners when they face potential risks such as flooding, unhealthy temperatures, or water shortage. Siemens' open, cloud-based IoT operating system 'MindSphere' is one such platform that could help the city understand how various data sets interact with one another and can be used to identify key opportunities for climate change adaption and mitigation processes.

Resident behaviour will also play a role as the effects of climate change are more intimately felt in the city. We encourage the city to further monitor residential resource use such as energy and water closely. The GLA could expand in this section to include how the city will likely use more energy in the future to cool buildings and homes due to increasing global temperatures. Moving away from a flat-rate water charge system could also be beneficial, especially as risks of drought increase in the UK. Water meters and usage based pricing models should be adopted so Londoners fully understand the cost of their consumption habits.

User: Ashden (a charity)

Policy SI3 B: We strongly support the development of energy masterplans for large-scale development locations. But the guidance included in section B of this policy at present is very focused on heat.

Energy masterplans should be required to look at all decentralised energy options including renewables generation, demand response and passiv design options.

Policy SI3 C: Where developers find that infrastructure cannot accommodate proposed new generation, they should be required to examine demand response and flexible grid management solutions, such as those provided by Ashden winners Open Energi and Smarter Grid Solutions, so that
infrastructure limitations do not prevent low carbon energy infrastructure being installed.

User: Miss Aliki Papasifaki

1. ‘Operational Zero Carbon’ by 2030 for all new buildings - this moves beyond the current definition of a ‘design prediction’ using a ‘percentage CO2 reduction’, to deliver actual operational and measured zero carbon buildings.
2. An absolute kWh metric – to allow the full range of stakeholders involved in the design, operation and delivery of our buildings to understand and therefore fully contribute to reducing energy consumption. ?
3. Adding a ‘Be Seen’ stage to the energy hierarchy - we fully support the inclusion of energy monitoring, this is seen as fundamental to achieving operational zero emissions and thus should be elevated into policy SI 2A. ?
4. Energy strategies to demonstrate future-proofing to ‘Operational Zero Carbon’ on-site by 2030 – we support clause 9.2.10i of the draft London Plan, but believe leaving it until 2050 will only encourage further lock-in to fossil fuel and urban combustion pollution. ?
5. Addressing whole life embodied carbon to be explicitly included in Policy SI 2 – to drive innovation addressing what will become the largest building carbon emissions challenge once operational carbon is reduced. ?
6. A zero emissions by 2030 transition plan to be provided for all district heat/energy networks, alongside disclosing energy usage and efficiency data to ensure that networks are part of the solution to delivering operational zero emissions. ?
7. The heating hierarchy to be renamed and rearranged to emphasis the changing priorities of a trajectory to a zero carbon London. ?
8. The importance of minimising energy demand peaks to be strengthened.
9. ‘Mayor’s Energy Advocates’ to be available for boroughs to assist in ensuring sustainable design is embedded, as a parallel to the Mayor’s Design Advocates. ?

User: Earthdome Ltd

There are alternative ways of improveing the energy efficency of buildings in London that are not in general use.

We have been working with a new patented technlogy Oxypod which has been tested at the National Phisical Lab (NPL) Teddington and UCL.

It is a simple patented technolegy with no moving parts that can be attached new or as a refit to boilers.

It removes disolved oxygen down to 2 parts per billion (ppb) in the closed loop of heating systems of any size be it home, office, factory, hospital, of power station. At this level corosion is not considered a problem. No need for magnetis or chemicals.

Because there are no gases in the water the water in the heating loop heats up quicker and and returns to the boiler hotter thus the boiler will not fire so often leading to reduced gas consumption and cleaner air quality for London.

It has been tested by National Energy Action (NEA) and shows a 24% energy efficency. NEA are interested in the technologies ability to help thoes in fuel poverty and low income. At a Building Resurch event it was celected as the judges product they would put their money on

It will have houshold energy savings between £100 to £300.00 per property and costs only £200.00 to buy.

PV on homes will cost around £5000.00 for a 4kW system and only achive an eletrical saving at best of £300.00

External wall insulation will cost around £8000.00 to £10,000 and will only save around £300.00

The NPL Teddington report is available.

My comment is: The London Plan should make it possable for new and emerging technologies to be formaly introduced for consideration as a solution to Londons energy efficency programms.

User: Dr Paula Morgenstern

1. ‘Operational Zero Carbon’ by 2030 for all new buildings - this moves beyond the current definition of a ‘design prediction’ using a ‘percentage CO2 reduction’, to deliver actual operational and measured zero carbon buildings.
2. An absolute kWh metric – to allow the full range of stakeholders involved in the design, operation and delivery of our buildings to understand and therefore fully contribute to reducing energy consumption. ?
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8. The importance of minimising energy demand peaks to be strengthened.
9. ‘Mayor’s Energy Advocates’ to be available for boroughs to assist in ensuring sustainable design is embedded, as a parallel to the Mayor’s Design Advocates. ?

User: Angela Chick

I support the ambition for London to become a zero carbon city, however this needs to be achieved sooner than 2050 if we are to meet our global commitments to tackle climate change. To do this, London needs to rapidly embrace renewable energy, including solar. The London Plan should include a clear policy to facilitate, support and promote the uptake of solar energy.

This could be achieved by adding a strong policy on solar energy and by requiring all new homes to be zero carbon.

User:	Anne Smith
With regard to solar panels ~ in order to encourage more people to install them they should be publicised more and the price brought down.	

User: Carole Destre

I support the ambition for London to become a zero carbon city, however this needs to be achieved sooner than 2050 if we are to meet our global commitments to tackle climate change and have a chance to not completely destroy the arctic. To do this, London needs to rapidly embrace renewable energy, including solar. The London Plan should include a clear policy to facilitate, support and promote the uptake of solar energy.

This could be achieved by adding a strong policy on solar energy (using wording in supporting text 9.2.3), by mentioning renewable energy infrastructure including solar technologies in Policy S13, and by requiring all new homes to be zero carbon. For example it should be made compulsory to put solar panels on all new building, commercial or residential. Huge opportunities were missed when the large Sainsbury, Marks and spencer, TKMaxx and other superstores were built at the Greenwich Peninsula. Why don't these new commercial buildings have solar panels on their roofs? It should be a no-brainer. Thousands of square metres of wasted space! If not solar panels, flats could have been built above them, and solar panels on top. A disgusting waste of space and energy. The same goes for the car parks! Why is there so much space allocated only to the cars parked in front of these respective stores? Why wasn't there a car park built underground, or, why aren't the car parks covered in solar p anels? Again a pure waste of space and money!

User: David Scott

Surely the London Plan should include a clear policy to facilitate, support and promote the uptake of solar energy, and other renewables? The aim to make London a zero carbon city needs to be achieved much sooner than 2050 if we are to meet our global obligations to tackle climate change, and we should therefore have a much more ambitious plan in place to embrace all forms of renewable energy, particularly solar, but also wind.

This could be achieved by adding a strong policy on solar energy (using wording in supporting text 9.2.3), by mentioning renewable energy infrastructure including solar technologies in Policy S13, and by requiring all new homes to be zero carbon.

User:	Juliet Hobday

I support the ambition for London to become a zero carbon city, however this needs to be achieved sooner than 2050 and requiring all new homes to be zero carbon.

User: Karina Kaatz

I support the ambition for London to become a zero carbon city, however this needs to be achieved sooner than 2050 if we are to meet our global commitments to tackle climate change. To do this, London needs to rapidly embrace renewable energy, including solar. The London Plan should include a clear policy to facilitate, support and promote the uptake of solar energy.

This could be achieved by adding a strong policy on solar energy (using wording in supporting text 9.2.3), by mentioning renewable energy infrastructure including solar technologies in Policy S13, and by requiring all new homes to be zero carbon.

- bann or fine idling

make black cabs go gree

User:	Nick Horgan

I support the ambition for London to become a zero carbon city, however this needs to be achieved sooner than 2050 (I'll be on my last legs by then, or sooner if nothing more ambitious is done).

User:	Essex County Council

The recognition that waste can form part of energy infrastructure is welcomed as, based on the waste hierarchy, this offers a last resort for utilising waste products before consigning them to disposal. With landfill becoming an increasingly less sustainable form of waste management, particularly in London, opportunities to reduce the amount of waste disposed of in this manner should be appropriately considered as part of the overall energy mix. The supporting text to this policy does not however expand on the ‘possible opportunities to utilise energy from waste’ as highlighted by policy, save for a brief mention at paragraph 9.3.7. It is therefore considered that the London Plan could go further in exploring the benefits of this practice here, even if it’s just by means to a reference to that contained in paragraph 9.8.5 where this is discussed.

Policy SI4 Managing heat risk

User:	ENGIE

ENGIE welcomes this opportunity to respond to the Mayor’s draft London Plan consultation. In particular we welcome the following:

- The proposal to promote the recovery and exploitation of waste heat resources in London. We encourage the GLA to explore ways to further incentivise and promote waste heat recovery in London- including through a more effective use of the planning process.

User:	Mr Sydney Charles
Support	

User:	Kent County Council

Better emphasise well-evidenced value of trees and other vegetation in relation to mitigating urban heat stress by amending B 2) as follows:

2)reduce the amount of heat entering a building through orientation, shading, albedo,fenestration, insulation, tree and shrub retention and/or planting and the provision of green roofs and walls

User:	L&Q

Heat risk

It is agreed that London must manage heat risk, but this policy is too simplistic and idealistic. It must acknowledge the interrelationship of overheating with air quality, carbon consumption, daylight / sunlight and private amenity space.

This policy should be revisited to consider the relevant matters in a holistic manner and not topic-by-topic.

User:	Taylor Wimpey UK

Policy SI4 Managing Heat Risks

We recognise the need to minimise internal heat gain and the impacts of the urban heat island including through design, layout, orientation and materials. The way in which this is achieved needs to be pragmatic, deliverable and cost effective .

User:	London Borough of Camden
We welcome the continued use of the energy hierarchy as means of reducing overheating.	

User: Ashden (a charity)

Policy SI4 A: we support the recognition that overheating can be managed through good design in the first place and highlight this as another example of how sustainable outcomes should be embedded in the design policies of the London Plan.

Policy SI4 B 4: Ashden winner Monodraught has highlighted limitations on their ability to promote passive ventilation/cooling in commercial premises. Current guidance on commercial spaces, for example, from the British Council for Offices (BCO) prevents them being an energy saving alternative to air conditioning in commercial buildings.

BCO guidance details an internal condition for mechanical air conditioning of 24°C + or – 2°C, which restricts alternatives to conventional mechanical air conditioning being utilised. In contrast, the Chartered Institute of Building Services (CIBSE) guidance for naturally ventilated buildings looks at an adaptive thermal comfort level which is more flexible. It allows for an increased level of indoor temperature by balancing it against the overall impacts of the seasonal increase in temperature, such as the fact that building occupants will be dressing appropriately for the season, which makes excessive cooling potentially uncomfortable.

If an adaptive temperature profile was adopted and promoted in the London Plan or in London engagement with the commercial sector, it will create a stronger market for passive cooling options and greater energy saving potential could be realised.

Policy SI5 Water infrastructure

User:	London Borough of Havering

Paragraph 9.5.7

The draft London Plan should identify which are the groups that are ‘vulnerable’ in the context of water bills rising in cost.

User:	Royal Borough of Greenwich

Supporting text should mention measures such as rainwater harvesting and grey water to achieve lower water consumption rates.

SI5D(2)

Thames Water needs to engage boroughs and set out its plans early so sites can be safeguarded or other opportunities explored before it is too late. There should be strategic planning of infrastructure needs which could be part of Integrated Water Management Strategies, but Thames Water must proactively engage with Boroughs.

User:	Royal Borough of Greenwich

A fittings based approach is not sufficient for water use efficiency. The internal and external design of buildings is also relevant as good design can lead to greater efficiency of water usage.

User:	Royal Borough of Greenwich

It is essential to understand, plan and implement new fully integrated water services infrastructure to support proposed development to avoid sewer and surface water flooding and increase water supply security in a more sustainable way. A coordinated and collaborative approach to investment and maintenance of infrastructure solutions between the relevant stakeholders will be required to meet this aim. IWMS can set the framework for achieving this, and the Mayor is encouraged to take a lead on this.

User:	London Borough of Enfield

5) The Draft Plan needs to proactively address the issue of London’s water shortage in anticipation of growth the forthcoming National Infrastructure Report.

User:	London Borough of Enfield

Policy SI5 looks at ‘Water Infrastructure’ but it needs to include a commitment from the mayor that the GLA will work with water supply and sewage companies in supporting anticipated growth. Measures such as smart metering, water saving and recycling measures have to be incorporated. SUDs should be applied to all development and not just in areas of flood risk as all areas are part of a catchment.

User:	(FOE) Friends of the Earth England Wales and Northern Ireland

We suggest this policy could be improved by the inclusion of specific references such as **'encourage and require grey water recycling and rainwater harvesting as part of new development schemes'.**

User: TUC London, South East and East of England

Policy SI5: Water infrastructure

1. The steps to optimise the use of water are welcomed but the present immense leakage rate of ‘cleaned water’ from the water distribution system needs to be reference to put the steps that are recommended in context, and the problems needs to be resolved.

User: Just Space

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

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

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

What Needs to be Done:

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

— Sustainable urban drainage systems

— Stopping the leaks

— Increase in river and canal transport for passengers and freight, including waste and construction materials

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

Incremental, low impact small scale interventions should be promoted.

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

Making London a Blue Green City

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

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

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

Sustainable Urban Drainage System (SuDS)

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

What Needs to be Done:

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

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

User:	London Borough of Bexley

Part E of **Policy SI5 Water infrastructure** needs to be more explicit in what it is trying to achieve. It is unclear what '*seek to improve the water environment*' means. Is this through the use of SuDS? If so, would the improvement be to water quality, or to biodiversity, or to amenity? The reference in Part E(2) to misconnected sewers is very much welcomed.

User:	Rosalind Readhead

Water consumption must be addressed with more robust policies in the London Plan.Londoners using 170 litres per day when the average is 140 litres.Cape Town now down to 50 litres per person per day and still running dry. The 11 cities most likely to run out of drinking water

http://www.bbc.co.uk/news/world-42982959

User:	Ministry of Housing, Communities & Local Government

The Secretary of State’s Letter in response to the draft London Plan consultation refers to inconsistencies with national policy, including the NPPF and to the detail and complexity of policy throughout the London Plan.
Part C1 of this policy appears to seek to mandate what is currently an optional element of Building Regulations with respect to water consumption.
Given that at Policy SI5 C2 the London Plan appears to require a particular BREEAM level specifically for water consumption, the Mayor may wish to consider whether it is appropriate to identify a specific element of the BREEAM standard to be achieved, given that the aim of BREEAM, is to achieve higher environmental standards for buildings whilst allowing flexibility across a range of environmental considerations.

User:	Kingston and Surbiton Constituency Labour Party

Generally we support these policies and particularly welcome the ban on fracking and the emphasis on recycling. We note the reference (9.5.6) to the short-term nature of water companies' investment plans; the large ring main in New Malden was a source of flooding for many years. Thames Water has now been working on it for about two years, and seemed to think it was a matter of historical pride that the existing main was 200 years old. We commented in the London Fire Service consultation in 2017 that flooding due to poor maintenance by water companies should be addressed.

User: Canal & River Trust

Paragraphs 9.5.4 and 9.5.5 refer to the preparation of Thames Water's Water Resource Management Plan and how the Mayor is 'reviewing the available information on each of the supply options alongside evidence of their impacts on Londoners and Mayoral priorities'. The options being considered by Thames Water include strategic water transfers using the Canal & River Trust's waterways. Should the Mayor or his advisors wish to discuss these options further then we would be happy to do so.

As explained in our response to the Draft Environment Strategy, the Trust considers that there is the opportunity for its network to play a greater role in helping to meet local water needs, particularly needs that can be met through the use of grey water. We consider that the ability to offer both a supply and discharge solution, with appropriate controls on water quality, means that our waterways provide an opportunity for a lifecycle water delivery and treatment model that maintains a steady state of water quality and flow, through the use of dual piped systems for new sites, the use of water treatment and attenuation. Whilst policy SI5 does not explicitly support the consideration of opportunities to use local water supplies, we consider that this would be consistent with (C)(1), which requires development proposals to minimise the use of mains water. As such we have no specific comments to make about the soundness of policy SI5.

User: London Environment Directors' Network (LEDNet)

Policy SI5 Water infrastructure

This policy should support greater water efficiency through refurbishment as well as through new development, including the retrofitting of rainwater harvesting and water meters and compliance with relevant BREEAM standards. We also suggest that the target of 105 litres/ person/ home should be made more stringent, given that this was the target for the Code for Sustainable Homes back in 2014.

The policy also needs to clarify the meaning of E 1) 'seek to improve the water environment'. Does this mean that infrastructure should be provided to support the achievement of 'good ecological status' for surface water as per the Water Framework Directive?

User: London Wildlife Trust

We welcome and support Policy SI5. However, we recommend adding text under paragraph 9.5.8 to read:

Borough's Local Plans are expected to be supported by evidence which demonstrates that the development planned for:

a) Will not compromise the Thames River Basin Management Plan objective of achieving 'Good' status, or cause deterioration in water quality, and;

b) Will be supported by adequate and timely provision of water infrastructure.

User:	London Property Alliance
The development management system is not the appropriate mechanism for preventing foul and surface water misconnections.	

User: Silvertown Homes

This policy relates to water infrastructure. As drafted it crossrefers to BREEAM. Whilst it is appreciated that BREEAM includes water requirements, it also includes a host of other requirements.

If the Mayor considers the London Plan should address BREEAM requirements then this should be via a specific policy which considers BREEAM as a whole, with the necessary supporting text.

User:	West London River Group

We support Integrated Water Management Strategies, which should be applied to any development where flood and water constraints, like limited sewer?capacity apply **not** just major developments. Therefore we suggest the following wording: Integrated Water Management Strategies should be considered for **any development** where flood and water constraints, like limited sewer?capacity apply.

User:	Bishopsgate Goods Yard Regeneration Limited

Policy SI5 considers water infrastructure and states at Part C(2) that commercial development proposals should achieve at least BREEAM excellent standard. Our client would like to seek clarification on whether this requirement just relates to the BREEAM Water Category or all BREEAM Categories.

User:	Barratt Developments plc
This policy relates to water infrastructure. As drafted it cross-refers to BREEAM. Whilst it is appreciated that BREEAM includes water requirements, it also includes a host of other requirements. If the Mayor considers the London Plan should address BREEAM requirements then this should be via a specific policy which considers BREEAM as a whole, with the necessary supporting text.	

User:	London Borough of Sutton

SUPPORT WITH CONDITIONS. The London Borough of Sutton supports Policy SI5 and notes that the minimum water mains consumption target for residential developments of 105 litres or less per head per day (excluding allowance of up to five litres for external water consumption) has been carried forward from the current London Plan.

It is not clear from Part C(2) whether commercial developments are required to achieve an overall BREEAM rating of ‘Excellent’, or whether this applies only to the water efficiency criterion. Further clarity and guidance is also required on ‘ Integrated Water Management Strategies’ as referred to in Paragraph 9.5.12 in terms of what they would entail, who should be involved in their preparation and how they can be promoted through Local Plan policies and development management decisions.

User: Argent (Property Development) Services LLP

Draft Policy SI5: ‘Water infrastructure’

This policy is unclear and therefore not effective. It states that development proposals should achieve at least BREEAM excellent. It is unclear whether this only relates to the BREEAM Water Category or all BREEAM Categories. Further, there is no evidence that the deliverability and cost implications of this been properly tested.

User:	London Borough of Newham

Policy SI5 Water infrastructure

LBN is supportive of this policy and it is considered to be complementary to Newham's Draft Revised Local Plan.

The scope of the policy could be broadened by setting out requirements and measures to reduce leakages. Furthermore it would be helpful if the GLA could set out their role in brokering increases to supply and capacity to reflect development opportunities.

User:	Croydon Limited Partnership

Policy SI5 considers water infrastructure and states at Part C(2) that commercial development proposals should achieve at least BREEAM excellent standard. CLP would like to seek clarification on whether this requirement just relates to the BREEAM Water Category or all BREEAM Categories?

User:	Brent Cross Cricklewood Development Partners

Policy SI5 considers water infrastructure and states at Part C(2) that commercial development proposals should achieve at least BREEAM excellent standard. The DPs would like to seek clarification on whether this requirement just relates to the BREEAM Water Category or all BREEAM Categories?

User: Hoare Lea LLP`

To ensure the intent of this policy is achieved, more specific targets would be required particularly with respect to water consumption in commercial developments. We would suggest that targets set in the BREEAM manual be referenced directly; that is:

1. Water consumption (BREEAM Wat 01) – achieve at least a 12.5% improvement over the baseline performance standard. Improvement on these limits would be strongly encouraged.

2. Water monitoring (BREEAM Wat 02) – provide water sub-meters for areas with at least 10% overall water demand of each development to allow for monitoring.

Further consideration of more ambitious water efficiency measures such as rainwater harvesting could be incorporated specifically for water stressed regions. Consideration for how limiting wastage of water from utilities should be strongly encouraged.

User: Natural England

Abstraction from rivers and groundwater aquifers already has detrimental impacts on our natural environment, including some of our most precious rivers and wetlands. Increased demand for water will exacerbate these impacts, or add new environmental pressures where new resources need to be developed to meet the demand.

This policy highlights the need to improve water infrastructure so as to reduce the frequency of water usage restrictions during droughts. However, there is insufficient recognition of the fact that reducing water demand at all times (not just during drought) can reduce pressure on our rivers and wetlands and improve ecosystem health, thereby increasing the resilience of the natural environment to drought and climate change, and providing a higher quality natural environment for us all to enjoy.

In order to fully recognise the positive impact that reducing demand for water can have on biodiversity we **recommend** the following measures:

- Part D.1 relating to development plans and the Thames River Basin Management Plan should read *'promote the protection and improvement of the water environment,* ***including through measures to reduce demand for water,*** *in line with the Thames River Basin Management Plan, and should take account of Catchment Plans'*

- E.1 should read *'Development proposals should seek to improve the water environment,* ***taking into account the impact of climate change in exacerbating the impact of demand for water through abstraction and its impacts on biodiversity and the wider natural environment,*** *and ensure…'*

We support measure E.2 which seeks to reduce the number of misconnections between foul and surface water networks, which has a significant impact on freshwater ecosystem health within London.

The formation of the Water Resource South East water expert group further highlights the need for biodiversity to be considered strategically on a similar scale (please refer to our comments on policies SD2 and SD3 for our full response on this matter). Water resource management has clear impacts on biodiversity and designated sites through changes in water quantity and quality, and as such the implications of water resource management decisions on biodiversity in the wider region should be fully considered.

User: CIBSE

SI5-A, B, and E: We support the overall objectives but would welcome the introduction of clearer and more specific criteria, and more specific targets for improvements to the water environment.

SI5-C: We support the water efficiency objectives of the policy, and the new attention given to non-domestic buildings. Smart metering could help monitor building performance, in a similar way as we support the monitoring of energy performance (SI2 & SI3).

We would also recommend the use of a holistic approach with recognition of the potential contribution by green infrastructure to water management and water quality – see response to Chapter 8.

User:	Mr Darren Coppins

10. My final comment relates to Policy SI5 item C2. I suggest this needs clarifying as it is vague. E.g. ‘BREEAM water efficiency minimum standard for Excellent shall be achieved, even when no or a lower BREEAM level is required’.

User:	Mr Sydney Charles
Support	

User: Redrow Homes London Division.

This policy relates to water infrastructure. As drafted it crossrefers to BREEAM. Whilst it is appreciated that BREEAM includes water requirements, it also includes a host of other requirements.

If the Mayor considers the London Plan should address BREEAM requirements then this should be via a specific policy which considers BREEAM as a whole, with the necessary supporting text.

User: Wimbledon East Hillside Residents' Association

Water: In our area we urge developers to put in water storage tanks and to use rainwater to wash footpaths, water green spaces and for diverting this water away from sewers and into green spaces. Did you know that 30% of the water in Thames Water drains is from rainwater, and that if we could just run rainwater pipes underground to disperse the water, they wouldn't need to replace all the Victorian pipes so quickly. Put another way, London could free up 30% of space in the drainage system, just by using rainwater locally instead of sending it down the sewers.

User: L&Q

Water infrastructure

This policy relates to water infrastructure. As drafted it cross-refers to BREEAM. Whilst it is appreciated that BREEAM includes water requirements, it also includes a host of other requirements.

If the Mayor considers the London Plan should address BREEAM requirements then this should be via a specific policy which considers BREEAM as a whole, with the necessary supporting text.

User: Taylor Wimpey UK

Policy SI5 Water Infrastructure

We believe that the minimising of the use of mains water in line with the Optional Requirement of the Building Regulations should not be a priority. The HBF (Home Builders Federation) have conducted some research on leaks and identified that cumulatively the Water and Sewerage Sector in England Wales loses around 25% of all potable water supplied across all customers. The last reported figures in 2015 confirmed a daily loss of 3,136 mega-litres/day. The HBF found little evidence in progress in leakage reduction. If water efficiency is taken too far in a residential context customer satisfaction with t heir appliances and homes reduces, and there is some evidence that they replace their low flow showers and taps with higher flow ones.

User:	Commercial Boat Operators Association
Policy SI5 Water infrastructure. (Has nothing to do with water transport!)	

User:	The Northbank BID

Water: Infrastructure investment for sustainable water supply and drainage

User: UK Rainwater Management Association (UKRMA)

The UKRMA strongly supports harvesting surface water for re-use as the best way of managing surface water, particularly where it is used as part of a fully integrated RWH/SuDS approach; the link with Policy S15 should also be emphasised. As this aspect of the Policy is at odds with the national SuDS Standard (rightly, bearing in mind stresses on London water-supplies), the GLA might also wish to explore the merits of implementing Schedule-3 of the 2010 Flood & Water Management Act, in the London area.

Recommendation: It is recommended that this policy should be more clearly linked with Policy S15 (and vice-versa), and associated narrative include future exploration of the implications of implementing Schedule-3 in the London area.

This policy includes a mention of water re-use as one ingredient in meeting future water demands. Unlike other aspects of the policy, however, subsequent narrative does not elaborate on this thought, leaving lack of clarity of the extent to which water re-use is encouraged by the Plan

Recommendation: It is recommended that two further brief narratives be inserted after the statements of Policy to explain how rainwater harvesting (RWH) and greywater recycling (GWR) fit into the overall water infrastructure picture.

User: Kew Society

Policy SI5 Water infrastructure

Paragraph 9.5.12. We wondered whether this should apply to all developments, not just large ones, where particular flood risk and water related constraints such as limited sewer capacity require an integrated approach to the provision of infrastructure and the management of risk.

User:	Karl Brown

9.5.1 Water drought is an issue fully expected to get worse. Grey water use for many household, and minor industrial uses is entirely possible. There is no mention of retrofit opportunities to existing households and possibly surprisingly, for new developments

User:	Waterscan Ltd

Whilst the draft makes good references to increased uptake of water re-use, i feel there is a small section missing, highlighting the potential impact of water scarcity, this should be looked at in the same risk manner as flooding, with encouragement for localised water re-use/recycling, intelligent water storage and use.

User:	Waterscan Ltd

It was disappointing to see the omission of greywater recycling as a means of mitigating water scarcity and improving a buildings overall water consumption profile and therefore meeting/exceeding the target 105 l/p/d water use target. given the commercial availability of these systems, the voluntary uptake and the usually acceptable return on investments, it would be good to see the london plan actively encourage this kind of technology, rather than rely on interpretation. this often results in low flow fixtures and fittings, which are easily reversed post occupancy.

User: Environment Agency

Likewise, in regard to wastewater treatment infrastructure planning, there is a need to ensure that the objective for achieving ‘good’ status for London’s water bodies, as required under the Water Framework Directive and in the Thames River Basin Management Plan, is not prevented by new / improved sewage treatment works’ capacity adversely impacting on receiving waterbodies.

We would expect the evidence to provide reassurance that at local (Borough) level, the proposed growth can be accommodated without causing a detrimental impact on the water environment and/or a deterioration in water quality. Consequently, we welcome policy Point D, subject to our recommendation below.

Recommendation

- We recommend adding to explanatory text, to clarify the responsibilities of borough’s development plans to have regard to water quality. This would support Policy Point D. We suggest adding text under paragraph 9.5.8 to read: ***‘Borough’s development plans are expected to be supported by evidence which demonstrates that the development planned for:***

a. ***Will not compromise the Thames River Basin Management Plan objective of achieving ‘Good’ status, or cause deterioration in water quality, and;***
b. ***Will be supported by adequate and timely provision of water infrastructure.***

User:	Environment Agency

We welcome the policy’s explanatory text, but note that there is no reference to meeting water supply needs from sustainable, localised, sources of supply. Policy SI13 rightly places ’rainwater harvesting’ at the top of the sustainable drainage hierarchy, and therefore there is scope to further integrate the objectives of these policies.

Policy SI6 Digital connectivity infrastructure

User:	Redrow Homes London Division.

The policy seeks development proposals to ‘achieve greater digital connectivity than set out in part R1 of the Building Regulations’.

As this policy acknowledges, digital connectivity is addressed via Building Regulations. The Regulations may change following the adoption of the London Plan and come to match or exceed what is sought in the supporting text.

Given these matters are addressed by Building Regulations then standards should not be set out in this policy or its supporting text. In any case, references to Building Regulations should beremoved from Policy SI6 and its supporting text.

User: Mill Hill Neighbourhood Forum

London should plan to be early adopters of technology developments and the DLP should have a section outlooking the key developments that will make a significant impact over say the next 5 years. This should be regularly updated as an addendum to the London Plan thus keeping fresh the aspirations for London to be at the forefront in taking advantage of emerging technologies and here I include building technologies that can make developments of high quality dwelling more “affordable”

We see that some simple and relatively low-cost technologies could be very cost effective and help to make London “Smart”. For example, deploying sensors in public parking spaces could assess when a car arrives and when it leaves and bill accordingly for the time used (in much the same way as we are now billed for crossing the Dartford road bridge/tunnel). People would not have to put money in a meter or pay-by-phone; they would pay for the time they use and a message could be sent to them to tell them they are entering a further charging period. Parking Penalty notices and traffic wardens would almost be consigned to history or deployed to better Police our streets. This is but one idea for consideration but we believe the GLA should take a lead in such strategic thinking.

We welcome the advent of the Autonomous Vehicles which could be called to your location by via a smartphone (or whatever technology has replaced it by then) and would drive you to masstransit; it would not need to park but could travel on to meet the next customer. Such a public utility should be run by TfL across London. If you want a place to trial them come to Mill Hill.

User:	Kent County Council

KCC supports the development of a deliverable longer-term strategy for the UK to extend the coverage of full-fibre networks and ultra-fast digital connectivity. Currently, there are no Building Standards or national planning requirements for new development sites to include fibre connectivity. KCC is currently working with Ashford Borough Council on the development of a fibre connectivity policy within their draft Local Plan which incorporates this requirement and is promoting this type of policy to the Ministry of Housing, Communities and Local Government (MHCLG) for consideration in the revised NPPF. KCC urges the draft London Plan to be bolder in its broadband policy to require all new homes to be delivered with fibre connectivity.

User: Cross River Partnership

The importance of this issue for London’s continued economic success internationally needs to be stressed more and the Policy could usefully highlight the detriment to London from failures to enhance the quality of the digital infrastructure across the capital. In a considerable part of the economically crucial areas of London, including the CAZ, digital download speeds are unacceptably low.

In addition, the Policy should be amended to recognise the crucial role played here by both the major providers of digital/broadband services and the regulator, Ofcom. They have been repeatedly challenged to make improvements in the service in London and although some progress has been made, it is far from satisfactory.

User: L&Q

Digital connectivity

The policy seeks development proposals to ‘achieve greater digital connectivity than set out in part R1 of the Building Regulations’. As this policy acknowledges, digital connectivity is addressed via Building Regulations. The Regulations may change following the adoption of the London Plan and come to match or exceed what is sought in the supporting text

Given these matters are addressed by Building Regulations then standards should not be set out in this policy or its supporting text. In any case, references to Building Regulations should be removed from Policy SI6 and its supporting text.

User:	dp9

Policy SI6 – Digital connectivity infrastructure

Whilst the ambition of this policy is supported, its introduction adds yet another requirement for developers to provide information on, and for Council’s to assess, as part of the planning process.

RECOMMENDATION: Delete policy.

User: Taylor Wimpey UK

Policy Sl6 Digital Connectivity Infrastructure

We are supportive of a high quality digital infrastructure for London to achieve greater digital and mobile connectivity. This is good for residents and positive for development. However we do not consider it appropriate to stipulate standards that are higher than current Part Rl of the Building Regulations.

User:	Kingston First

In addition to environmental sustainability, it is important that infrastructure supports the long-term viability of the town centre networks. As has already been discussed, it is vital that town centres adapt to changing consumer behaviour and this includes digital connectivity. Kingston First supports draft Policy SI6 and the need to provide sufficient ducting space to plan for current and future need. In historic environments such as Kingston Town Centre, such planning should account for the difficulty in providing digital connectivity in and around historic buildings. New development should account for the connectivity needs of the surrounding area, in addition to the site itself.

User:	London Borough of Enfield
3) Digital Infrastructure Connectivity needs to be prioritised in growth areas.	

User: Home Builders Federation

Policy SI6: Digital connectivity infrastructure

Parts of the policy are unsound because they are unjustified and contrary to national policy.

The Mayor should not stipulate standards on digital connectivity. Following the Government's *Housing Standards Review*, the Written Ministerial Statement of 25 March 2015 announced that local planning authorities preparing Local Plans *"should not set any additional standards or requirements relating to the construction, internal layout or performance of new dwellings"*. In terms of the construction, internal layout and performance of new dwellings, the Mayor and the local planning authorities are only allowed to adopt the three optional technical standards subject to evidence of need and viability. Although the GLA is not a local planning authority and the London Plan is not a Local Plan, the Mayor is subject to national planning policy when formulating strategic planning polices for the London LPAs. The Greater London Authority Act, 1999 in Part VIII, Section 337, sub-section (6) allows the Secretary of State to intervene where London Plan policy deviates from national policy.

We do not consider it appropriate for the Mayor to stipulate standards that are higher than current Part R1 of the Building Regulations.

Part 1) of the policy is also vague in terms of what 'achieve greater digital connectivity than set out in part R1 of the Building Regulations' might mean in practice. The wording of the policy is unsatisfactory because it is unclear to applicants and decision-takers as to how they should respond to this.

User:	Battersea Project Land Company Limited

Policy SI6 – Digital connectivity infrastructure

Whilst the ambition of this policy is supported, its introduction adds yet another requirement for developers to provide information on, and for Council's to assess, as part of the planning process.

RECOMMENDATION: Delete policy.

Policy SI7 Reducing waste and supporting the circular economy

User: Federation of Small Businesses

Small businesses find it particularly hard to comply with their waste management responsibilities. It is extremely difficult for them to access suitable waste and recycling services at an affordable cost, as many local authorities do not offer business waste and recycling services to small firms as they tend to produce only small volumes of waste, or they may not be able to attract the services of private companies.

And yet they are often prohibited from community recycling services because they are deemed to be commercial operations.

In order to improve rates of recycling, it would be very helpful for all small and micro businesses to be able to use community recycling centres. Currently they cannot and if they try to do so, are liable to incur a hefty fine.

It is vital that councils are encouraged to treat their micro-business community in a similar way to domestic residential consumers.

Small businesses are very good at re-using resources such re-using packaging boxes or purchasing second-hand equipment and can, where regulation allows, be very resourceful in turning waste products into useful goods or services for their customers.

There needs to be much better joined up thinking on how the policies are applied across the waste agenda with more support and encouragement for small businesses who wish to develop innovative solutions but are often discouraged because of the way waste and other regulations are interpreted and applied at a local level.

User:	Revo

We support the reduction of waste and supporting the circular economy and other sustainability initiatives, although we share concerns over how these targets will ultimately be achieved across the breadth of our sector from construction, through life to demolition, and look forward to further guidance on how best to do so.

User: Construction Products Association

1. The construction product manufacturing sector has already reduced to very low levels the amount of waste it produces in manufacturing processes. At the construction site level we seek to support the contractors to reduce the amount of waste generated from a site. Across the country the recovery rate for construction, demolition and excavation waste is already over 85%. Although much of this is downcycled at the present time. We suggest that excavation waste figures are looked at separately from construction and demolition waste, as this depends on projects such as Crossrail which is doing extensive excavation work and producing large quantities of inert soil and stones for which an optimal solution has to be identified.

2. Currently there are few markets for secondary construction materials and products and these will in any case need to go through the testing for durability, fire resistance etc before warranties and insurance can be given for their reuse. There are also questions of ownership and liability to be addressed as well as waste legislation and end of waste criteria. Circular Economy thinking is therefore a direction of travel for the construction industry but there are many hurdles to overcome in the short term.

User:	British Property Federation

The draft policy around the reduction of waste and the circular economy is largely welcome. We do however express some concern that high-rise developments face greater difficulties recycling materials. We would welcome some additional guidance on how best to improve recycling rates in high-rise buildings.

User: East of England Local Government Association

The key task for Waste Planning Authorities (WPAs) in the East of England is the provision of sufficient waste management capacity for the equivalent quantity of waste arising in their area, together with an additional quantity of waste that is received from London. While the London Plan aspires to self-sufficiency, the reality of providing waste management facilities in London is very challenging, particularly in the current context in which housing takes priority over industrial development, especially potentially “bad neighbour” uses such as waste management facilities. Historically London has been dependent on landfill void in both the East of England and the South East of England for disposal of its residual waste, and this is still the case to a significant degree. However, landfill sites in the East of England have now largely closed and the cost of landfilling biodegradable waste is extremely high, largely due to the landfill tax which currently stands at £86.40 per tonne.

The authorities in the East of England have some of the highest recycling rates in the UK as shown in the graph below:

Refer graph: Waste Management in 2015/16 – Page 8 of rep

The East of England Waste Technical Advisory Group have prepared a response in relation to waste matters in the London Plan. This has been drafted in collaboration with the Waste Authorities in the East of England and should also be considered as forming part of the East of England LGA response to the London Plan on waste matters. A copy of this response is attached at **Appendix 2.**

User:	East of England Local Government Association

In general, the waste policies in the Draft Plan are good and address many of the issues that the East of England WTAB has raised in the past. However, there remains a discrepancy between the aspirational tone of the policies and way in which they are implemented. A clear approach to implementation and monitoring is required to ensure that these aspirations are met. The other Mayoral Strategies (eg: the London Environment Strategy which has significant land use implications) should be incorporated into the London Plan so that there is a suite of consistent policies for London.

User: East of England Local Government Association

Policy S17 A2) States that “Waste reduction increases in material re-use and recycling, and reductions in waste going for disposal will be achieved by… 2) encouraging waste minimisation and waste avoidance through the re-use of materials…” This policy confuses a number of terms each of which should be defined if the policy is to be meaningful. Re-use is not the same as minimisation while the term “Waste prevention” is used in Government policy.

Policy S17 includes a target for recycling of municipal waste. Municipal waste is not easily measured since it includes all Local Authority Collected Waste plus an element of commercial waste (arguably all of it). It will therefore not be possible to monitor this target. It would be better for the target to be for Local Authority Collected Waste, or Household Waste, both of which are effectively measured.

User: East of England Local Government Association

9.7.4

Paragraph 9.7.4 states that “Re-use and recycling rates for **construction, demolition and excavation** waste (CD&E) in London is estimated between 50-60% for 2015 with some large construction projects including the Olympic Park achieving 85 – 95% recycling rates. However, the evidence for this assertion is not available. On the contrary, exports of waste from the London Borough of Newham in the years before the 2012 Olympics were abnormally high, implying that significant quantities of waste were removed from the site rather than recycled. A background paper explaining how this figure has been reached should be produced to support the statement.

The Methley decision means that the 95% recycling figure for CDEW is unlikely to be achieved. It was noted that CDEW should be apportioned. The London Plan should identify strategic sites for the management of CDEW since large sites are needed to achieve this effectively. Encouragement should be given to the maximum level of recycling of CDEW on site wherever possible, in accordance with the “excellent” BREEAM standard.

User: East of England Local Government Association

The Plan should further acknowledge that London is unlikely to be self-sufficient in the management of excavation waste and that work will need to take place with other WPAs to identify additional sustainable waste management solutions to manage all the arisings from within London.

The Plan should also state that the Mayor will expect the promoters of major projects to propose solutions to the disposal or recovery of excavation waste generated by their projects.

The proposed “Circular Economy Statement” would appear to be similar to the Site Waste Management Plans that were introduced nationally in 2008. These will only apply to developments that are above the threshold to be referred to the Mayor and this will exclude a significant proportion of projects in London. A key element of SWMPs was the quantifying of the waste arising from a development and submission of these Plans to the local planning authority and the new CE Statements will need to be agreed by the GLA.

The aspiration for London to achieve net self-sufficiency in managing its waste arising is welcomed, although the current trend shows slow progress towards this target.

User: North London Waste Plan

1 Municipal waste target:

We note the new recycling target for municipal waste. This replaces the recycling target for household waste. London Environment Strategy explains the logic behind the thinking. The London Plan defines municipal waste

Based on the EU definition of municipal waste being household waste and other waste similar in composition to household waste. This includes local authority collected waste and commercial waste.

Municipal waste is therefore comprised of household and commercial waste, but not industrial waste. The Environment Agency's Waste Data Interrogator, which is used by most agencies for waste data, lumps household, industrial and commercial waste together under the 'HIC' category. Consequently it will not be possible for boroughs to monitor how much 'municipal' waste is being recycled. In the absence of any commitment to monitoring from the GLA (see our comment below) this is problematic in terms of how boroughs will know how they are doing against the target.

It also leaves uncertain the expected contribution of LACW to the municipal waste target The ability to contribute to the recycling target will vary from borough to borough. For some boroughs these targets are very challenging especially inner and central London boroughs with lots of flats and fewer gardens yielding up green waste. Other boroughs will be able to achieve higher recycling levels and it is important that the targets are applied to London as a whole. The LES implied that boroughs would get individual targets for the achievement of LACW. It would make sense for these targets to be incorporated into the London Plan target. This is another reason why the Mayor needs to commit to monitoring waste arisings and the achievement of targets.

User: North London Waste Plan

In 9.7.4 the Mayor sets out his suggestions for what boroughs should encourage for CD&E. This could be expanded but also needs to be set within a wider policy approach. Under the NPPW and NPPG, boroughs need to plan for CD&E waste but London Plan doesn't mention this. LWPF suggests a new addition (4) to policy S18 B:

SI8 B [Development plans should]

4) set out how construction, demolition and excavation waste and hazardous waste will be managed

London has embarked on a number of big tunnelling projects starting with Crossrail and Thames Tideway Tunnel. There should be a requirement within the London Plan for the Mayor to agree a strategic plan for the waste from the promoters of large infrastructure projects. After 9.7.4 the LWPF suggests an addition relating to excavation waste.

> “ When large infrastructure projects are proposed, such as Crossrail2, the Mayor will ensure that through the supporting environmental statement that the best environmental option practicable for the management of these materials is used. ”

The Mayor needs to commit to monitor this target.

User: North London Waste Plan

5 Exports

Excavation waste from large infrastructure projects in London may well end up being exported out of London. The additional text after 9.7.4 proposed in 3 CD&E target and policy above deals with the project level. In terms of the duty to co-operate responsibilities of boroughs, 9.7.5 could be better phrased to describe what needs to go on

> **“** 9.7.5 When it is intended to **export waste** to landfill outside of London, it will be important for boroughs to show that the receiving ~~authority~~ authorities have~~s~~ the capacity to deal with waste over the lifetime of the ~~development~~ local plan. This will also help receiving authorities plan for future needs. **”**

User: North London Waste Plan

6 Circular Economy Statement

LWPF supports the proposed requirement for a “Circular Economy Statement”. This has the potential to assist boroughs in their duty to co-operate discussions on movements of waste and inform authorities outside of London how much waste they will receive. Further guidance on this will be key as it is not clear how or what information will be collected, recorded, monitored or accessed by waste planning authorities wishing to utilise this information. The LWPF looks forward to working with the GLA to develop the guidance.

User: Surrey County Council

Although we support the general approach to reducing waste and supporting the circular economy set out in Policy S17, we do have concerns about the policy's effectiveness and suggest that the Plan should:

- Set clear definitions for the term 'circular economy' and related terms ('circular economy principles' and 'highest use').
- Make it clear how 'a more circular economy' would be promoted.
- Consider whether the recycling target of 95% by 2020 for construction, demolition and excavation waste is meaningful for a Plan that is not due to be adopted until 2019 and so there would be little time for the policy to take effect (although we support the ambition of this target).

User:	Surrey County Council

We support the principle of requiring Circular Economy Statements to be submitted with referable applications. The information in these statements should be available to those local authorities, including those outside London, receiving the waste and the Plan should indicate how this will be achieved in order to ‘help receiving authorities plan for future needs’ (para 9.7.5). The supporting text also sets out that ‘where it is intended to export waste to landfill outside of London, it will be important to show that the receiving authority has the capacity to deal with waste over the lifetime of the development’. It is important to clarify that “lifetime of the development” includes both the construction and operational phases of the development. Furthermore, to meet this requirement, it is recognised that developers may ask the receiving authority for details of their capacity but it is also important that the receiving waste authority is provided with information from the developer as to the amount of waste they can expect to receive. Further guidance on Circular Economy Statements (para 9.7.6) should address these issues and cover both the construction and operational phases of development.

User:	North London Waste Plan
Paragraph 9.10.3 references Policy SI7 and it is suggested that Policy SI10 is similarly referenced in paragraph 9.7.4.	

User:	London Wildlife Trust
We support Policy SI8.	

User:	South East Waste Authority Planning Advisory Group (SEWPAG)

3. Parts of the Plan are drafted in a manner which perpetuates the sense that waste management is a service of lesser importance than other utilities such as energy and water. An example is the first sentence of paragraph 9.6.7. Historically it has certainly been the case that waste production and management has been a lesser consideration and given lower priority by planners when making decisions on the appropriateness of development; the London Plan must do all it can to avoid any such suggestion and ensure that waste is treated on a par with the other essential utilities.

User: South East Waste Authority Planning Advisory Group (SEWPAG)

The general approaches set out in Policy SI7 are supported, however SEWPAG has concerns about the effectiveness of the policy which are detailed below:

7. As it stands the London Plan implies a meaning to the term ‘circular economy’ and related terms (‘circular economy principles’; ‘highest use’) but it is considered that the effectiveness of the Plan would be improved if clear definitions for such terms were included. For example, SI7 A 1) states that waste reduction etc. will be achieved by ‘promoting a ***more*** circular economy…’. It is noted that the term ‘circular economy’ is not explained in the glossary.

8. SI7 A 1) would be more effective if it was clear how it is envisaged that ‘a more circular economy’ will actually be promoted – what would such promotion entail?

9. It is noted the term ‘waste avoidance’ is used in A 2) – does this mean the same as the term ‘waste prevention’ which is used within the Waste Hierarchy (Waste Management Plan for England, Waste Prevention Programme for England and National Planning Policy for Waste)? If so it would be more consistent and clearer to use the term ‘waste prevention’.

10. A 2) may be taken to conflate waste avoidance with waste reuse – waste cannot be reused if it does not exist in the first place (i.e. has been avoided) and higher order strategies should be put in place to avoid waste, such as increasing product life, ahead of waste reuse. It is suggested that ‘respectively’ be added at the end of the clause to make it clear that waste minimisation relates to reuse of materials and waste avoidance relates to using fewer resources.

11. Despite the text in paragraph 9.7.3, clause A 4) appears to conflate recycling with generating low carbon energy from waste and so it is suggested that a separate clause be inserted that clearly sets out how proposals for energy from waste would be supported by the London Plan. As it stands it may be implied from this clause that the 65% by 2030 MSW target applies to a combination of waste management by energy generation and recycling.

12. A 95% by 2020 target for construction, demolition and excavation waste may be hard to achieve – is this intended to refer to inert CDEW? And, as above, its unclear if this is to be achieved by recycling or energy from waste. The target also seems to overlook the fact that adoption of the London Plan is timetabled for Autumn 2019 and therefore it is hard to see how any of its policies will realistically have time to influence its achievement. The meaningfulness of the target as currently drafted is therefore questioned.

13. The requirement to consider waste management when designing developments in clause A 5) is supported, however it is suggested this clause should refer to ‘collection systems’ as well as storage space.

14. SEWPAG supports the mention of the work completed by LWARB and LEDNET concerning the management of waste from flatted development in paragraphs 9.8.17 and 3.4.11 but suggests consideration be given to inserting the wording of the template policy that was prepared as part of this work. An outcome of this work was a ‘Waste Management Strategy’ template to be used by developers to show how waste would be managed during the construction and operational phases of the development – it is considered that this template fulfils many of the requirements of a ‘Circular Economy Statement’ and could usefully be referred to and/or replicated in the ‘further guidance’ mentioned in paragraph 9.7.6. Indeed, perhaps the second sentence of paragraph 9.8.17 would also more logically appear within paragraph 9.7.6, or elsewhere within the supporting text for Policy SI7.

15. As above, clause B 4) should reference ‘collection systems’ as well as storage space.

16. Clause B 5) should expect the details concerning waste management to show how waste will be ‘managed in accordance with the waste hierarchy’, rather than simply‘handled’.

17. SEWPAG would also like to reiterate the following related comment it made on the Draft London Environment Strategy:

“Developers should be expected to design in optimal waste management systems and local authorities should be resourced to determine how well proposals for managing waste in a development are aligned with best practice on the management of waste in flats. Resources are needed to help architects and designers and local authorities identify the optimum solution for managing waste in flats. Such resources include examples of existing best and worst practice from recent developments around the world in terms of social, environmental and

economic impacts of different solutions taking account of the complex and psychological relationship between users and their space. Resources should allow evidence based decisions on the best options for waste management in new flatted development. A citizen centred approach is needed as successful waste management within high density housing can only be achieved with the participation of its residents. Any strategies need to factor in how the behaviour of residents will affect their success and foster pro-social, rather than anti-social, behaviour."

18. The second sentence of paragraph 9.7.1 mentions reuse and recycling but not energy generation which seems to be inconsistent the approach espoused by clause A 4) in the related policy.

Hazardous Waste
19. The quantity of hazardous waste produced in London, and the fact that is considered as a subset of household and commercial and industrial waste, should be made clear in Paragraph 9.7.2.

20. Paragraph 9.8.15 is specifically concerned with hazardous waste and proposes actions needed to ensure its management however SEWPAG is concerned that there are no specific policies concerned with hazardous waste management, especially in light of the following statement in paragraph 9.8.15: *"Without sustained action, there remains the risk of a major shortfall in our capacity to treat and dispose of hazardous waste safely."* And "There is therefore a need to continue to identify hazardous waste capacity for London." To remedy this situation SEWPAG propose changes to policies and SI9 and paragraph 9.8.15

21. Data provided by the Environment Agency to SEWPAG suggests that 382,000 tonnes of hazardous waste was exported from London in 2015. This does not take account of hazardous waste produced in London that is managed in London and so it likely that the value of hazardous waste arising in London provided in paragraph 9.8.15 (324,000 tonnes) is an underestimate.

Draft London Environment Strategy

22. Paragraph 9.7.3 suggests that "The London Environment Strategy sets out the Mayor's approach to waste management in detail", however SEWPAG has concerns that the draft LES does not do this and made the following comments on the draft LES:

"On page 260 the Draft London Environment Strategy (LES) states: *"The Mayor has no responsibility or powers in this strategy to directly control the management of industrial waste and construction, demolition and excavation waste where it is not in the possession or control of a waste authority."* This statement appears inaccurate, as there is nothing to stop the Mayor preparing a strategy for non-municipal waste if he

chooses – there is nothing in legislation that would prevent this. Clear statements on the issues associated with the production and management of non-municipal waste, with a strategy to address them, are needed as without this the Environment Strategy simply cannot be said to address the management of London's waste. This is especially important as the mayor's own data indicates that municipal waste constitutes less than half of the total waste produced in London with non municipal waste. Indeed the GLA strategy 'Making sense of business waste' states that Commercial & Industrial (C&I) and Construction, Demolition and Excavation (CDE) waste streams *"account for 16 million tonnes, or around 80 per cent of solid waste generated in London." "*

Construction and Demolition Waste

23. Paragraph 9.7.4 seems to suggest that all construction, demolition and excavation waste is 'inert' however this waste stream contains significant quantities of wood, metal, plastic etc. which cannot be used in land reclamation and coastal defences. As it stands the Plan does not appear to have considered how the non-inert fraction of construction, demolition and excavation waste will be managed.

24. It is noted that paragraph 9.7.4 suggests 'safeguarded wharves' could be used 'where appropriate', 'to achieve a more beneficial re-use' of 'construction, demolition and excavation waste', however wharves have a specific purpose of the landing of waterborne materials and SEWPAG is concerned that alternative uses might hinder their effectiveness and greater clarity is therefore needed on what is meant by 'where appropriate'.

25. SEWPAG would question whether the use of inert construction, demolition and excavation waste in what are essentially bulk fill applications (land reclamation and coastal defences) constitutes 'more beneficial and higher order uses'. SEWPAG suggests that a 'higher order use' would be one for which the materials within the construction, demolition and excavation waste were originally intended e.g. as a building material such as that used in concrete.

26. Paragraph 9.7.4 essentially suggests that there is no need for any new sites for the management of construction, demolition and excavation waste however the evidence to support this assertion is not clear.

27. Paragraph 9.7.5 mentions the need to discuss export waste (apparently of any type) to landfills in areas outside of London with the receiving authorities – and in doing so essentially repeats the statutory Duty to Cooperate requirements – suggesting that the export of waste to landfills in areas outside of London is part of the London Plan's strategy for managing waste. Statements made elsewhere suggest no biodegradable and recyclable waste will be exported after 2026. SEWPAG consider that the London Plan should make it much clearer that such a management approach is one of last resort and any export to landfills beyond London should be kept to an absolute minimum. Further

comments are included below

28. The second sentence of footnote 130 is unclear.

User: South East Waste Authority Planning Advisory Group (SEWPAG)

Proposed changes to text and policies

To help address some of the comments made above the following changes to text of the Draft London Plan are proposed:

Policy SI 7 Reducing waste and supporting the circular economy
"A Waste reduction, increases in material re-use and recycling, and reductions in waste going for disposal will be achieved by:
1) promoting a more circular economy that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible
2) encouraging waste minimisation and waste avoidance through the reuse of materials and using fewer resources in the production and distribution of products respectively
3) ensuring that there is zero biodegradable or recyclable waste to landfill by 2026
4) meeting or exceeding the recycling targets for each of the following waste streams and generating low-carbon energy in London from suitable remaining waste:
municipal waste127 – 65 per cent by 2030
construction and~~,~~ demolition ~~and excavation~~ waste – 95 per cent by 2020
5) designing developments with adequate and easily accessible storage space that supports the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food.
6) ensuring that environmental, social and economic benefits from waste and secondary materials management are created.

B Referable applications should promote circular economy outcomes and aim to be net zerowaste.
A Circular Economy Statement should be submitted, to demonstrate:

1) how all materials arising from demolition and remediation works will be re-used and/or recycled

1A) how the best environmental and most practicable option for the management of excavation waste will be used

2) how the proposal's design and construction will enable building materials, components and products to be disassembled and re-used at the end of their useful life

3) opportunities for managing as much waste as possible on site

4) adequate and easily accessible storage space to support recycling and re-use

5) how much waste the proposal is expected to generate, and how and where the waste will be handled.

User: South East Waste Authority Planning Advisory Group (SEWPAG)

Proposed changes to text and policies

To help address some of the comments made above the following changes to text of the Draft London Plan are proposed:

Paragraph 9.7.3:
"The London Environment Strategy sets out the Mayor's approach to waste management in detail. The Mayor is committed to meeting or exceeding the recycling targets for each of the following waste streams, and to generating low-carbon energy in London from suitable remaining waste: municipal waste129 – 65 per cent recycling/composting by 2030 construction and~~,~~ demolition ~~and excavation~~ waste – 95 per cent recycling by 2020."

User: South East Waste Authority Planning Advisory Group (SEWPAG)

Proposed changes to text and policies

To help address some of the comments made above the following changes to text of the Draft London Plan are proposed:

Paragraph 9.7.4:

"Re-use and recycling rates for construction and, demolition ~~and excavation~~ waste (**C&D~~&E~~**) in London is estimated between 50-60 per cent for 2015 with some large construction projects including the Olympic Park achieving 85 – 95 per cent recycling rates. ~~Nevertheless, more beneficial and higher order uses of this inert waste, for example in conjunction with land reclamation or coastal defences, are possible.~~ For C&D waste, a~~A~~ combination of mobile facilities on construction sites, effective use of existing waste processing sites and, where appropriate, safeguarded wharves, as well as the provision of recycling facilities at aggregate extraction sites, should be capable of meeting the anticipated future requirement within London to achieve a more beneficial re-use of this material."

New paragraph to follow on from paragraph 9.7.4:

9.7.4A Non-hazardous excavation wastes, which include clean inert excavated materials (such as subsoils and clayey materials arising from tunnelling), cannot be 'recycled', however such waste can be put to a beneficial use in engineering operations for example in conjunction with land reclamation or coastal defences. It is possible, and preferred, that such operations take place within London, however for large infrastructure projects (such as Crossrail 2 and HS2) the significant quantities of excavation waste arising mean that large quantities are likely to be exported for management in neighbouring areas. Due to case law, the Methley Quarry decision, proposals which would have previously counted as recovery, such as the restoration of Wallasea Island in the Thames Estuary using excavation waste from Crossrail, would now be classified as landfilling. Therefore the target in Policy SI 7 applies to Construction and Demolition Waste only. When large infrastructure projects are proposed, such as Crossrail2, the Mayor will ensure that through the supporting environmental statement that the best environmental option practicable for the management of these materials is used. It is also possible that CL:AIRE protocols[1] may be applied such that excavation materials can be managed in a manner where they are not considered as waste.

Footnote

User: South East Waste Authority Planning Advisory Group (SEWPAG)

Proposed changes to text and policies

To help address some of the comments made above the following changes to text of the Draft London Plan are proposed:

Paragraph 9.7.5:

9.7.5 The Mayor recognises that the **export of waste to landfill outside of London** is, in most cases, the least preferred waste management option. Therefore w~~W~~hen it is intended to export waste to landfill outside of London[2], it will be important to show that:

a. all other practicable options for the management of that waste have been considered and that this is the best practicable environmental option; and,

b. the receiving authority has the capacity to deal with waste over the lifetime of the development. This will also help receiving authorities plan for future needs.

Footnote

2 Either by developers in new development proposals or by Boroughs when preparing Local Plans

User:	London Property Alliance

This is an unnecessary level of detail and a strategic policy on this issue is unnecessary. It should not apply automatically to all referable proposals

User: Silvertown Homes

Reducing waste arising from developments and encouraging the circular economy is an admirable and sustainable policy. These matters are or can be addressed through the current suite of application documents including Construction Management Plans, Logistics Plans, Site Waste Management Plans and / or Sustainable Design and Construction Statements.

It is not necessary to introduce another statement (a Circular Economy Statement) to the list alongside. This is onerous for all parties and does not necessarily provide any benefit. References to Circular Economy Statements should be removed from the draft London Plan.

User: Institution of Civil Engineers - London region

Circular Economy
ICE London strongly supports the circular economy, whereby the greatest possible value is extracted from resources before they become waste.

A circular economy is one where materials are retained in use at their highest value for as long as possible and are then re-used or recycled, leaving a minimum of residual waste. London should move towards this approach as it will save resources, increase the resource efficiency of London's businesses, and help to reduce carbon emissions.

We are pleased with the inclusion of encouraging waste minimisation and waste avoidance through the reuse of materials and using fewer resources in the production and distribution of products, and in particular the construction, demolition and excavation waste of 95 per cent by 2020.

ICE London strongly supports the principles for large-scale developments with opportunities for innovative building design that avoids waste, supports high recycling rates and helps London transition to a circular economy, where materials, products and assets are kept at their highest value for as long as possible.

We welcome the GLA and London Waste and Recycling Board budget to support the circular economy businesses on commercial terms, and call on the Mayor to be a vocal proponent of this.

ICE London firmly believes that sustainable infrastructure solutions must also include an element of design for deconstruction and beneficial re-use rather than demolition. This is a more sustainable method long-term, and one that should be encouraged at the early stages of design.

We also agree that the best use of the land needs to be taken into consideration when

Policy SI8 Waste capacity and net waste self sufficiency

User:	South East Waste Authority Planning Advisory Group (SEWPAG)

14. SEWPAG supports the mention of the work completed by LWARB and LEDNET concerning the management of waste from flatted development in paragraphs 9.8.17 and 3.4.11 but suggests consideration be given to inserting the wording of the template policy that was prepared as part of this work. An outcome of this work was a ‘Waste Management Strategy’ template to be used by developers to show how waste would be managed during the construction and operational phases of the development – it is considered that this template fulfils many of the requirements of a ‘Circular Economy Statement’ and could usefully be referred to and/or replicated in the ‘further guidance’ mentioned in paragraph 9.7.6. Indeed, perhaps the second sentence of paragraph 9.8.17 would also more logically appear within paragraph 9.7.6, or elsewhere within the supporting text for Policy SI7.

For other areas of search

User: South East Waste Authority Planning Advisory Group (SEWPAG)

29. SEWPAG supports the target for net self sufficiency by 2026. However it is unclear what volumes and types of waste London expects to import/export as part of the 'exchange' of waste between areas within and beyond London. Unless this is clear it is hard to see how this target will be met as the required facilities may not exist or be available. Further comments on waste imports/exports are provided below.

30. SEWPAG strongly supports the safeguarding of existing waste management sites proposed by this policy.

31. It is unclear what clause A 3) means by the optimisation of capacity of existing sites – for example, does this expect transfer stations to become recycling facilities, or is it intended that the ability of existing sites to manage waste should be optimised (e.g. by increasing throughput)? This should be clarified.

32. Would clause A 5) sit better within policy SI7 (as this seems to reflect a principle of the circular economy)?

33. Clause B 1) suggests Developments Plans should identify how waste will be reduced in line with Circular Economy principles, however this is not wholly within the remit of a Development Plan e.g. a Development Plan cannot set out how goods can be designed to maximise their life. Furthermore it is not clearly stated what the London Plan considers 'circular economy principles' to be. It might be clearer ,and consistent with National Planning Policy for Waste, to refer to the Waste Hierarchy instead.

Borough apportionments

34. In implementing clause B 2) (identifying land for managing waste apportionments) it is considered that it would be helpful to provide a guide as to how much waste can reasonably be managed per hectare. Comments on the level of apportionments in Table 9.2 are provided below.

35. Clause B 2) states that 'capacity' should be provided within each borough to manage specific apportionments of household and commercial and industrial waste and in principle SEWPAG supports the provision of clarification in paragraph 9.8.4 of what waste managed in London means, however it is considered that the Plan should make it clear that the activities listed in paragraph 9.8.4 are those which qualify to meeting Borough apportionments. Furthermore paragraph 9.8.4 notes that *"waste is deemed to be managed in London if any of the following activities take place within London:*

o waste is used for energy recovery

o it relates to production of solid recovered fuel (SRF), or it is high- quality refuse-derived fuel (RDF) meeting the Defra RDF definition as a minimum
o it is sorted or bulked for re-use (including repair and re-manufacture) reprocessing or recycling (including anaerobic digestion)

Policy SI9 Safeguarded waste sites

User:	London Sustainability Exchange
Additional sites will be required - these should be identified in theplan	

User:	Mr Chris Gannaway
Strongly support this policy	

User:	London Forum of Amenity and Civic Societies

London Forum supports this policy.

User: Biffa Waste Services

Biffa supports the inclusion of a robust policy that seeks to safeguard waste management facilities within London and we welcome the positive approach being adopted through policy SI9, and the recognition of the importance of existing waste infrastructure in paragraph 9.9.1. This approach is consistent with national planning policy (NPPW, paragraph 8).

We propose that background text within paragraph 9.8.17 is included within the policy wording itself, as follows:

1. ***Following the Agent of Change principle, developments adjacent to waste management sites should be designed to minimise the potential for disturbance and conflicts of use.***
2. *Existing waste site should be safeguarded and retained in waste management use;*
3. *Waste facilities located in areas identified for non-waste related development should be integrated with other uses as a first principle where they deliver clear benefits;*
4. *Waste plans should be adopted before considering the loss of waste sites. The proposed loss of an existing waste site will only be supported where appropriate compensatory capacity is made within London that must at least meet, and should exceed, the maximum achievable throughput of the site proposed to be lost.*

User:	Biffa Waste Services

We support the objective of providing compensatory waste capacity if loss of existing capacity is unavoidable. The existing wording does not state that there would be no overall net-loss of capacity within London, and as such this should be incorporated to ensure consistency with policy SI9.

User: Biffa Waste Services

The draft Plan should be cautious about an over reliance on increasing capacity at existing locations to meeting the waste management apportionments defined in the draft Plan. There are numerous land-use constraints within London which have already resulted in existing sites becoming restricted, particularly when considering encroachment from residential uses and the future demand for housing provision. Policy SI9 will provide some additional mitigation in this regard. It should be borne in mind that operators will always seek to maximise the potential of existing assets, but that these constraints can be prohibitive in realising such potential.

User:	Rail Freight Group
Policy SI9 Safeguarded Waste Sites We support the safeguarding of waste sites some of which are rail linked.	

User:	The Pinner Association
Support – and boroughs should be required to co-operate so that the most easily accessed, with the shortest journey, waste site may be used by residents of other boroughs rather than being required to drive a distance across a large outer London borough to access “their” waste site.	

User:	Bracknell Forest Council

There is also support for Policy S19 to safeguard existing waste sites. This will be important if waste capacity is to be maintained in the context of intense demand for development land.

I trust that due consideration will be given to the comments made above and that you will continue to engage in constructive dialogue with Councils across the south-east as the Plan progresses through its further stages.

User: Royal Borough of Kensington and Chelsea

9.6 Policy SI9 Safeguarded waste sites

Policy S19 C may result in waste management capacity within one borough / waste planning grouping being lost and replaced outside of that area/grouping. This may affect the ability of some boroughs to meet their apportionments. The Council notes the proposed closure of the EMR site in the OPDC/LBHF area. This is being released for development because OPDC do not consider it is required to meet LBHF's apportionment. The EMR facility is a vital contributor of apportionment capacity for the Western Riverside WPAs and its closure could impact on the waste management capacity available to the grouping.

The Mayor will need to provide reassurance that boroughs / waste planning grouping will not be penalised if the loss of waste management capacity affects their ability to meet apportionments.

In conclusion the GLA must provide a much stronger strategic lead in dealing with waste matters as the existing arrangements are highly unsatisfactory and have been for some considerable time. This is one matter that needs a very clear direction and a lead from the GLA.

User: Kew Society

Policy SI8 Waste capacity and net waste self sufficiency

We note that Policy Sl8 states that existing “waste management sites” should be safeguarded, and that policy Sl9 states that they should be retained. These statements should be strengthened by referring to “waste management sites and recycling centres”. We are mindful that the Richmond Borough Recycling Centre in Townmead Road, Kew, occupies a site next to the River Thames which could be seen by developers as highly desirable for expensive housing. No doubt there are other similar sites in London. They must not be allowed to disappear unless Boroughs in which they are sited are able to provide replacements with at least equivalent or better facilities.

Policy SI9 Safeguarded waste sites

As in our comments on Policy SI18, for clarity this should refer to” waste management sites and recycling centres” rather than just waste management sites.

User:	London Borough of Barnet

With increasing levels of flatted development, and known lower levels of recycling within flats (both new and old) compared with houses we question how the Mayor will be supporting boroughs to deliver on their waste targets Barnet in partnership with six other London Boroughs is producing the North London Waste Plan (NLWP). The Programme Manager for the NLWP has submitted comments on the DLP waste policies on behalf of the seven participating boroughs.

User:	London Waste and Recycling Board (LWARB)

1. We suggest policy SI9(A) – Safeguarded waste sites, is amended to read “Existing waste sites will be safeguarded and retained in use for waste management, or circular economy related activity”.

User: London Borough of Lambeth

Lambeth welcomes the explicit requirement for boroughs to identify and safeguard all existing waste sites and retain them in waste use. However, where Policy SI8.A.2 references policy SI9 it refers to safeguarding waste management sites rather than just waste sites. Given that "management" has a particular meaning in the London Plan, which excludes transfer stations, it would be useful if the word "management" was removed from Policy SI8.A.2.

Lambeth also welcomes the definition of waste sites, that includes land with planning permission for a waste use or a permit from the Environment Agency for a waste use.

Paragraph 9.9.2 provides a methodology to estimate the throughput of a site and this is welcomed, but a five year overview may be more appropriate than three years as it allows for a longer economic cycle. It may also be helpful to provide a guide to the size of site required for compensatory capacity (throughput per hectare). This will allow boroughs to judge if a proposed replacement site is of an appropriate size. 60-65,000 tonnes per hectare is suggested as it is an approximate average of a range of technologies.

Paragraph 9.9.3 states "Policy SI8 Waste capacity and net waste self-sufficiency promotes **capacity increases at waste sites**c where appropriate to maximise their use. If such increases are implemented over the Plan period, it may be possible to justify the release of waste sites without capacity re-provision if it can be demonstrated that there is sufficient capacity available elsewhere at appropriate sites over the Plan period. In such cases, sites could be released for other land uses." This appears to contradict Policy SI9.C which states that the loss of a waste site will only be supported where compensatory capacity is made. Notwithstanding this, it is imperative that any release of waste sites without replacement capacity is tested against the ability of London as a whole to meet its target of net self-sufficiency. Without this test, individual boroughs will be able to release capacity without due regard to the London-wide targets in Policy SI8.1.A. It is not clear where "elsewhere" is in relation to this policy and it should be clarified that this is "elsewhere in London". Monitoring of London's target of net self-sufficiency will be an important measure to assess if sites can be released on this basis. It should also be noted that it is far more difficult to develop a new waste facility in London than it is to safeguard an existing waste site. London's need for waste capacity is shown to increase over the plan period and so the ultimate aim of a policy allowing any release of capacity is unclear.

See the additional point about monitoring of waste management under Chapter 12 below.

User:	London Borough of Haringey
The Council supports this policy.	

User: London Borough of Barking & Dagenham

Table 11.1 of the London Industrial Demand Study shows that that is an indicative land requirement for waste in Barking and Dagenham of -21.3 hectares and similar reductions in the other release boroughs. In other words, there is a surplus of land in waste use or allocated for waste in the release boroughs. This is not surprising. A journey to Dagenham Dock, Thames Road and River Road will reveal a multitude of waste uses, many low grade and far removed from the type of waste management facilities envisaged by the London Plan and its encouragement for the circular economy. These uses blight the local area and are subject to regular enforcement action by the Environment Agency. These sites act as a barrier to regeneration on nearby sites. Yet the London Plan safeguards such uses, irrespective of their quality and purpose, and requires that they should be re-provided if lost. The London Plan should only require those well managed waste uses necessary to manage our apportioned waste should be safeguarded, not low grade waste uses which are surplus to requirements.

On the other hand, Table 11.1 shows that many other boroughs require additional land for waste uses. Therefore, not only do the release boroughs have proportionally some of the highest apportionments they are also required to maintain the existing surplus in waste management capacity, which means their actual apportionment is significantly above that shown in Table 9.2. To make matters worse, Barking and Dagenham is still receiving applications for waste uses which have been forced out of Greenwich and Hackney due to regeneration. In line with our Joint Waste Plan we refuse these applications on the basis we have met our apportionment through our more proactive approach to planning for waste uses in our Joint Waste Plan. Greenwich and Hackney are retained boroughs and shown in Table 11.1 as having marginal surplus waste capacity and in the case of Hackney a deficit. Policy S19 needs to recognise these spatial imbalances in waste provision and make clear, in line with the proximity principle, that where a waste use is lost in a retain or provide borough the capacity must be re-provided in that borough and not re-provided in a release borough where there is already a surplus of waste capacity.

User:	London Borough of Lewisham

No comment on policy SI9.

We highlight that paragraph 9.9.2 suggests waste site release should be part of a plan-led process. This, is already taking place as we work with other Local Authorities as part of the South East London joint waste planning group to pool our waste apportionment requirements and identify sufficient capacity at safeguarded waste facilities across south east London to meet these requirements.

User: London Borough of Brent

The Council supports this policy.

However, some of the wording is not entirely clear or effective. Amend Policy SI9C to:

"Waste plans should be adopted before considering the loss of waste sites. The proposed loss of an existing waste site will only be supported where appropriate compensatory capacity is made within London that must at least meet, and should exceed, the maximum achievable throughput of the site proposed to be lost".

It should also be clarified whether the London Plan would support more mixed-uses on waste sites, where the waste capacity can be maintained or exceeded.

User:	Member of Parliament for Chipping Barnet

Pinkham Way Alliance (PWA):

I have been shown the submission by the PWA and note their welcome of your stated ambition to make London at least 50% green by 2050. The organisation also welcomes clarification in the plan about suitable sites for locating waste treatment facilities.

User:	London Borough of Bromley

There is some concern about the blanket retention of all existing permitted sites without caveat, particularly small privately managed sites and those in the Green Belt which include inappropriate but established uses. Should a site cease operation, re-providing that capacity in a more suitable location may not be possible within the Borough boundary and it is unclear how “appropriate compensatory capacity” could realistically be achieved.

User:	Environment Agency
We welcome points in regards to the safeguarding current waste management sites (Point A)	

User: Environment Agency

We welcome points in regards to the safeguarding current waste management sites (Point A), and of no loss of capacity without compensatory provision (Point C). At Point C., we suggest that the term ‘maximum achievable throughput’ is open to an interpretation that could lead to an over-estimation of capacity. Consequently, we recommend the policy amendments below.

Recommendation:

- Define the term ‘appropriate’ in SI9 C so that ‘compensatory provision’ is on a like-for-like basis, based upon the waste hierarchy.
- Define the term ’capacity’ in SI9 C. This should be based on 4 year average rather than ‘maximum achievable throughput’. Alternatively, an assumption of tonnage per hectare could be used.

User:	London Borough of Tower Hamlets

We do not consider this policy adequate as it is our view that compensatory capacity should be based on the maximum throughput (or more) achieved in the last 5 years or be based on a throughput between 45,000 and 65,000 tonnes per hectare per annum.

The GLA should act as a broker/facilitator in re-allocating apportionments where a waste site is lost in a borough. This should be reflected in the supporting text.

User:	Royal Borough of Kingston
Support.	

User:	London Borough of Waltham Forest

We do not consider that part C of this policy will be deliverable. Notably it appears to conflict with para 9.8.7 of SI18 which promotes a flexible approach to safeguarding waste sites. In addition it does not give clear recognition to the waste apportionment system across London in which a capacity surplus in one borough might net out a deficit in another. This is another area which would benefit from higher level strategic coordination.

User:	Norfolk County Council

Policy SI 9 Safeguarding waste sites
Safeguarding existing waste management sites in London is important to enable London to have net waste self-sufficiency, that is, for all of London’s waste to be managed within London.

User:	London Borough of Hounslow
LB Hounslow supports this policy	

User:	West Sussex County Council

1. The County Council supports Policy SI9, which seeks to ensure that all existing waste management sites should be safeguarded, and only being allowed to be lost if compensatory capacity is made within London. Without safeguarding capacity, the ability for London to achieve net self-sufficient is unlikely.
2. However, the validity of only safeguarding when compensatory capacity is to be provided (based on the maximum throughput in the previous three-year period) is questioned. This could result in a lower compensatory capacity being provided; rather, the maximum design capacity should be provided as compensation. The Plan's approach risks a reduction in capacity, which will make it difficult to achieve the overall strategy. Therefore, the supporting text of Policy SI9 should be clear what 'appropriate compensatory capacity' means because there is the risk that recycling or treatment capacity is lost and only replaced with transfer (or bulking of waste) capacity, which would not be considered appropriate.

User:	London Borough of Southwark

The council supports the plan-led approach to the release of waste sites for development and the increased flexibility to plan across borough boundaries. However, it may not be necessary or appropriate to directly compensate for the entire throughput. Part of the necessary capacity could be provided in advance of the redevelopment of waste sites. Para 9.9.3 states “it may be possible to justify the release of waste sites without capacity re-provision if it can be demonstrated that there is sufficient capacity available elsewhere at appropriate sites over the Plan period. In such cases, sites could be released for other land uses.” For clarity the council suggests this flexibility is reflected in the policy as well.

User: London Borough of Richmond Upon Thames

The outer London Boroughs have the greatest increase in waste apportionment i.e. in the West London Waste area it is an extra 700,000 tonnes but the outer areas have also to find the greatest number of new homes. This Borough already has a shortage of industrial land,so there is a tension in identifying space for new or intensifying waste uses on industrial land.

The Council is currently part of the West London Waste Authority boroughs that plan for the waste authority area's waste apportionment, and welcomes the positive wording as set out in criteria B2.

Richmond Borough strongly supports safeguarding waste sites. The pressure forredevelopment on waste sites can lead to the running down of existing operations e.g.Arlington Works, in the Borough. The Council suggests that the policy text in para. 9.9.2 is reworded to "assess the maximum throughput achieved over at least three active years" to counteract the lessening of throughput from those seeking to make a case for cessation of waste activities on site.

User: London Borough of Harrow

The Council supports this policy.

It is unclear why the policy requires waste plans to be adopted before considering the loss of waste sites, as waste sites are those with planning permission for waste use or a permit from the Environment Agency for waste use and their loss is only acceptable where appropriate compensatory capacity is made within London, such a process of compensation can occur outside the plan making process. The first sentence of (C) should therefore be deleted.

Consistent with other elements of the draft Plan (mixed / intensified use), this policy should be clear as to whether the existing waste sites can be intensified in such a way that the waste capacity is maintained or exceeded on a smaller area, thereby freeing up land for other, appropriate uses.

User:	Cambridgeshire

The safeguarding of existing waste management facilities as described in Policy S19 is supported. However, it is evident that such sites are susceptible to being redeveloped to more valuable uses. A more robust delivery of this policy in the future is required; and monitoring of this policy should be undertaken.

User:	London Borough of Enfield

Policy SI9 ‘Safeguarded waste sites’ needs to define these as ‘land with planning permission for a waste use and a permit from the Environment Agency for waste use’.

User: Just Space

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

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

?**What Needs to be Done:**

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

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

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

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

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

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

The Circular Economy

Presently: A wider understanding of the circular economy needs to be further developed and integrated into policy and practice. It is presently pitched and defined (9.7.1) as an economic model, but whilst this may offer attractions to businesses and those promoting economic growth, this is not its full potential. West London businesses were introduced to the concept by the Mayoral Development Corporation the OPDC, liked it, but did not understand how it can be introduced and brought up to scale. Transition will not happen unless the practicalities are understood and easy entry points to change are available.

What Needs to be Done:

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

A Green and Localised Economy

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

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

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

Car travel, long commutes and long-distance deliveries can be reduced by ensuring employment and amenities are available and accessible across London's neighbourhoods and that businesses are

inter-connected. A more localised economy will move away from the current over-reliance on the Central Activities Zone and the town centre hierarchy, towards a more poly-centric distribution of local centres that often include high streets, shopping parades and street markets. These provide local jobs, low cost workspace and a variety of products and services, as well as essential social infrastructure.

More than two thirds of London's jobs are located outside the Central Activities Zone (CAZ) and London's 600 high streets represent some of the most important spaces in the city for the local economy; they have proved to be resilient over the centuries, adapting as circumstances change. Trading in street markets and covered markets, the oldest form of retail trading is increasingly under threat. Many of our markets are especially valuable to low-income communities and the low cost of pitches and stalls support entrepreneurship and family businesses. A rich mix of economic activity contributes to increased wellbeing, security and support especially for those who are most disadvantaged. Local jobs are particularly important for those with child-care or other caring responsibilities especially when part-time work is scarce.

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

All This Requires:

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

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

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

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

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

Recognise and protect street and covered markets as a) a source of healthy and cheap food and other goods b) a social benefit c) a source of independent business and local supply d) providing local employment e) an opportunity for start-up businesses. Local authorities should seek to retain control of management and rent-setting and must consult with traders and customers on future proposals.

User:	London Borough of Bexley

Paragraph 9.9.2 supporting **Policy SI9 Safeguarded waste sites** notes that any waste site release should be part of a plan-led process and this is welcomed. Bexley is part of the southeast London joint waste planning group, which pools its waste apportionment requirements. A joint evidence paper sets out the safeguarded waste facilities in the sub-region that provide the capacity to meet the pooled requirement.

User: Veolia

As suggested above, land upon which to build waste sites in London is extremely difficult to come by. In order to prevent waste travelling long distances (with the associated GHG emissions) there will always be a need for local waste infrastructure. Veolia, providing waste services to 40 percent of Londoners, are in a relatively unique position operating a number of waste facilities in London - Southwark Integrated Waste Management facility, SELCHP, Brent RDF plant and Greenwich Bulky MRF. Many of our competitors that are not big players in London will therefore not have the same incentives to locate within London as land and labour costs are higher.

Protecting existing waste sites/ land currently designated for waste management activities is therefore important. However, there will also need to be some flexibility when selling a waste site, because limiting the number of potential buyers can make it difficult to sell or effectively reduce the price you'd get for the sale due to reduced demand/competition.

In any case, local plans must consider the need for waste sites as part of a holistic approach to land use.

User: North London Waste Plan

14 Safeguarding and compensatory re-provision

LWPF believes that if a capacity needs to be re-provided (in SI9) because a waste site is lost, it should be necessary to consider the last five years throughputs (para 9.9.2). Where a safeguarded waste site has been out of active use for some time, it should be appropriate to assume a throughput per hectare such as used by the GLA or the borough in their evidence base.

In addition, given that the apportionment system in London relies on every borough playing their part, a surplus of capacity in one area may be a deficit in another. Therefore there should not be release of waste sites except on a London-wide basis. The LWPF suggests the following change to 9.9.3

If such increases are implemented over the Plan period, it may be possible to justify the release of waste sites without capacity re-provision if it can be demonstrated that there is sufficient capacity available ~~elsewhere~~ in London at appropriate sites over the Plan period. In such cases, sites could be released for other land uses.

Paragraph 9.8.7 under SI8 states "*Plans or agreements safeguarding waste sites should take a flexible approach.*" This appears to contradict Policy SI9 which requires boroughs to identify and safeguard all existing waste sites and retain them in waste use and should therefore either be deleted or cross referenced to SI9 to ensure a consistent approach.

User: North London Waste Plan

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User:	North London Waste Plan

15 Agent of change

LWPF supports the application of this principle (in 9.8.17) when sensitive uses are located near existing waste site and recommend it goes into the policy SI9. It is in policy D12 and is referred to in SIL, wharves and sites policies amongst other references.

User:	Surrey County Council

There is extreme pressure on development land in London and if net self-sufficiency is to be achieved, waste sites should not be redeveloped for non-waste uses other than in exceptional circumstances and when compensatory capacity can be provided. Therefore, the county council strongly supports the approach to the safeguarding of waste sites (Policy S19). However, we are concerned that compensatory capacity will be calculated using the maximum throughput achieved over the last 3 years, and this could mean that no compensatory capacity is required if a site has been dormant. Compensatory capacity should equate to the maximum design capacity of a facility or maximum capacity achieved over the life of a facility. Policy SI9 should make clear that transfer capacity cannot compensate for treatment capacity.

User:	South East Waste Authority Planning Advisory Group (SEWPAG)

51. SEWPAG strongly supports the approach to the safeguarding of existing waste sites proposed by Policy SI9. There is extreme pressure on development land in London and, if net self sufficiency is to be achieved, waste sites should not be redeveloped for non waste uses other than in exceptional circumstances and when compensatory capacity can be provided.

52. SEWPAG is concerned that compensatory capacity will be calculated using the maximum throughput achieved over the last 3 years, and so if a site has been dormant this suggests that no compensatory capacity is required. Instead SEWPAG suggest that the compensatory capacity should equal the maximum design capacity of the facility or maximum capacity achieved over the life of the facility.

53. Policy SI9C should make it clear that transfer capacity cannot compensate for treatment capacity. At a minimum compensatory capacity should be at the same level of the waste hierarchy.

User:	South East Waste Authority Planning Advisory Group (SEWPAG)

Proposed changes to text and policies

To help address some of the comments made above the following changes to text of the Draft London Plan are proposed:

9.9.3 Policy SI8 Waste capacity and net waste self-sufficiency promotes **capacity increases at waste sites** where appropriate to maximise their use. If such increases are implemented over the Plan period, it may be possible to justify the release of waste sites without capacity re-provision if it can be demonstrated that there is sufficient capacity available elsewhere at appropriate sites over the Plan period such that the target of achieving 100% net selfsufficiency is not compromised. In such cases, sites could be released to other land uses.

User: South East Waste Authority Planning Advisory Group (SEWPAG)

Proposed changes to text and policies

To help address some of the comments made above the following changes to text of the Draft London Plan are proposed:

Policy SI9 Safeguarded waste sites

A Existing waste sites should be safeguarded and retained in waste management use.
B Waste facilities located in areas identified for non-waste related development should be integrated with other uses as a first principle where they deliver clear local benefits.

C Waste plans should be adopted before considering the loss of waste sites. The proposed loss of an existing waste site will only be supported where appropriate compensatory capacity is made within London that must be at or above the same level of the waste hierarchy and at least meet, and should exceed, the maximum achievable throughput of the site proposed to be lost.

D Development proposals that would result in the loss of existing sites for the treatment and/or disposal of hazardous waste should not be permitted unless compensatory hazardous waste site provision has been secured in accordance with this Policy

User:	London Borough of Sutton
SUPPORT. The London Borough of Sutton supports Policy SI19.	

User: North London Waste Plan

	Comment	Suggested change
Policy SI8 Waste capacity and net waste self-sufficiency	General – inconsistent use of words This policy refers to *waste management sites* at A2, A4 and 9.8.8 but to *waste sites* at D. Policy SI9 refers to *waste sites* in its title, in A and in 9.9.1. As *waste deemed to be managed* has a specific meaning in the London Plan (see 9.8.4) the use of the term *waste site* is preferred as in: A waste management facility is located on a waste site.	A2, A4, 9.8.8 waste ~~management~~ sites

User: North London Waste Plan

	Comment	Suggested change
Policy SI9 Safeguarded waste sites A	The policy should go further to protect existing waste facilities from non-waste development making it clear that it is not just protecting against loss when sites are displaced but also the impact on the operation of existing sites when non waste uses affect their operation. This picks up the agent of change principle.	Link to agents of change policy to ensure same considerations apply to waste facilities
B	This is an important principle and should be further developed in text below the policy	Add explanatory text about principle of integrating waste uses in an area of non-waste development.
C	Where capacity is lost and displaced to another borough, the apportionment of waste should be reviewed to consider the local effects on this change in capacity .	

User: North London Waste Plan

	Comment	Suggested change
9.9.2	Should be throughput over five years to get a better average	When assessing the throughput of a site, the maximum throughput achieved over the last ~~three~~ five years should be used.

User: North London Waste Plan

	Comment	Suggested change
9.9.3	This paragraph contradicts policy SI9 and 9.9.2. Since the apportionment system depends on all boroughs meeting their apportionment, a surplus in one borough may be a deficit in another borough In any case, it seems extremely unlikely that any waste site could be released without capacity re-provision unless London's net self-sufficiency target has been met, assuming "elsewhere" means "in London".	If such increases are implemented over the Plan period, it may be possible to justify the release of waste sites without capacity re-provision if it can be demonstrated that there is sufficient capacity available ~~elsewhere~~ in London at appropriate sites over the Plan period. In such cases, sites could be released for other land uses.

User: London Borough of Newham

Policy SI9 Safeguarded waste sites

This policy would seem to be problematic for a number of reasons, firstly in light of difficulties presented by the previous policy, and cross boundary co-ordination, (waste plans being usually multi-borough tasks, and further requiring Duty to Co-operate work over a wide area) the requirement to have an adopted waste plan before even considering the loss of waste sites, particularly those that have never been activated and no commercial interest in them, is very inflexible. Indeed it can be the case that such sites reflect dated apportionments which have since reduced. It would be more appropriate to specify that alternative means of providing for necessary capacity have been demonstrated, and to acknowledge the relationship with plan-led employment land review which can occur more straightforwardly in individual borough Local Plans, albeit still necessarily involving Duty to Co-operate conversations. Indeed, the overall largely static presumption set out by this policy sits poorly with the methodology in the LILD (London Industrial Land Demand Study) for projecting industrial land demand-based requirements, which seems to imply an overall downward trend in spatial requirements for waste-related uses due to ongoing efficiencies – albeit this methodology appears problematic in its own right given a poor relationship with on the ground spatial realities. Thirdly, the policy fails to acknowledge the GLA's role as a major landowner in planning for such provision (given that some safeguarded sites fall on its land) and facilitating and swaps in some areas. Fourthly, the interface with planning for net self-sufficiency needs clarifying, given that in some industrial areas such as Newham, sites are handling significant flows from outside of London not acknowledged in the waste apportionment figure, and contrary to the proximity principle.

User:	Central Bedfordshire

Minerals and Waste

• We welcome and strongly support the overall strategy for minerals and waste, in particular:
• The provision for safeguarding aggregate wharves and railheads (PoliciesT7, SI10 and SI15);
• The emphasis on recycled aggregates, whilst at the same time seeking to maintain aggregate landbanks (Policy SI10);
• The safeguarding of aggregate resources (Policy SI10)
• The reduction and minimisation of waste, aiming at a circular economy (Policy S17);
• Waste self-sufficiency by 2026 (Policy SI8);
• The safeguarding of waste management sites (Policy SI9);
• The ‘Agent of Change’ principle (Policy D12) which will assist in safeguarding existing mineral and waste sites.

User:	Wokingham Borough Council

WBC strongly supports the intention that by 2026 London will cease to export household and commercial and industrial waste (Table 9.3).

There is also support for Policy S19 to safeguard existing waste sites. This will be important if waste capacity is to be maintained in the context of intense demand for development land.

User:	Mr Robert Allenby
Support	

User:	Mr Sydney Charles
Support	

User: DB Cargo UK Ltd

DB Cargo supports the statement that existing waste sites should be safeguarded and retained in waste management use and that the loss of an existing waste site will only be supported where appropriate compensatory capacity is made within London that must at least meet, and should exceed, the maximum achievable throughput of the site proposed to be lost.

DB Cargo consider that the policy should make particular reference to the value of waste and recycling sites with rail access and the need to protect these. There should also be more specific proposals on how conflicts with sensitive uses should be dealt with by Boroughs to avoid undermining the operation of sites and necessary co-located facilities.

User: dp9

Policy SI9 – Safeguarded waste sites

We support this policy, and in particular part B. At Cringle Dock in LB Wandsworth, BPLC and Western Riverside Waste Authority have successfully demonstrated how non-wharf uses can be introduced alongside wharf uses to meet a range of planning policy objectives, including the protection of a wharf's strategic function alongside the delivery of new homes and/or jobs within an Opportunity Area. We consider that this is a model that could be capable of being promoted elsewhere in London, as the pressure to optimize development on and around safeguarded wharves increases.

User:	Taylor Wimpey UK

Policy SI8 Waste capacity and net waste self-sufficiency and Policy Sl9 Safeguarded waste sites

These policies are about waste infrastructure and we do not believe that this will have a significant impact on house building and have no comments.

User:	Berkshire Strategic Planning Group

There is also support for Policy S19 to safeguard existing waste sites. This will be important if waste capacity is to be maintained in the context of intense demand for development land.

User: Kew Society

Policy SI9 Safeguarded waste sites

As in our comments on Policy SI18, for clarity this should refer to” waste management sites and recycling centres” rather than just waste management sites.

User:	Battersea Project Land Company Limited

Policy SI9 – Safeguarded waste sites

We support this policy, and in particular part B. At Cringle Dock in LB Wandsworth, BPLC and Western Riverside Waste Authority have successfully demonstrated how non-wharf uses can be introduced alongside wharf uses to meet a range of planning policy objectives, including the protection of a wharf's strategic function alongside the delivery of new homes and/or jobs within an Opportunity Area. We consider that this is a model that could be capable of being promoted elsewhere in London, as the pressure to optimize development on and around safeguarded wharves increases.

User:	Karl Brown
9.9.2 The maximum throughput of the last three years almost inevitably underplays the potential of a fully intensified site. Best practice from within the borough, or London, for an equivalent site would represent a much more demanding measure for operators / WDA's.	

User:	Essex County Council

The principle of waste safeguarding is supported but it is considered that more detail could be provided with regard to the spatial extent to which safeguarding provisions could apply, and when these should be given focus within a planning application.
It is considered beneficial to highlight that ‘waste sites’ could also include key infrastructure which facilitate the movement of waste such as wharves. It is recognised that the policy principle of safeguarding wharves is established elsewhere in the Plan (at SI15 – Water Transport, Policy T7 – Freight and servicing) but it could nonetheless be highlighted within the appropriate waste policy to recognise the importance transfer sites play in the sustainable management of waste. It is noted that safeguarding wharves is highlighted within Policy SI10 – Aggregates.

User: London Waste Planning Forum

14 Safeguarding and compensatory re-provision

LWPF believes that if a capacity needs to be re-provided (in SI9) because a waste site is lost, it should be necessary to consider the last five years throughputs (para 9.9.2). Where a safeguarded waste site has been out of active use for some time, it should be appropriate to assume a throughput per hectare such as used by the GLA or the borough in their evidence base.

In addition, given that the apportionment system in London relies on every borough playing their part, a surplus of capacity in one area may be a deficit in another. Therefore there should not be release of waste sites except on a London-wide basis. The LWPF suggests the following change to 9.9.3

If such increases are implemented over the Plan period, it may be possible to justify the release of waste sites without capacity re-provision if it can be demonstrated that there is sufficient capacity available ~~elsewhere~~ in London at appropriate sites over the Plan period. In such cases, sites could be released for other land uses.

Paragraph 9.8.7 under SI8 states “Plans or agreements safeguarding waste sites should take a flexible approach.” This appears to contradict Policy SI9 which requires boroughs to identify and safeguard all existing waste sites and retain them in waste use and should therefore either be deleted or cross referenced to SI9 to ensure a consistent approach.

15 Agent of change

LWPF supports the application of this principle (in 9.8.17) when sensitive uses are located near existing waste site and recommend it goes into the policy SI9. It is in policy D12 and is referred to in SIL, wharves and sites policies amongst other references.

Policy SI10 Aggregates

User:	Rail Freight Group

Policy SI10 Aggregates We strongly support the requirement for safeguarding of railheads used for aggregates.

We suggest that policy SI10 (clause D) is extended to specifically apply the ‘Agent of Change’ principle to safeguarding of rail depots in the same manner that it is applied to wharves through Policy SI15. The designing-in of mitigation to ‘agent of change’ development at an early stage (particularly to reduce noise impacts) is equally important for rail depots as wharves.

User: Freight on Rail

Policy SI10 *Aggregates*

We support the carrying forward of the apportionment for primary aggregates to 4 boroughs (from the existing London Plan), the provision for safeguarding of resources, recycling facilities, and wharves and rail depots. Continuing with the apportionment levels is justified given evidence of construction demand and increasing investment by industry in submitting planning applications within London. Maintaining the apportionment levels recognises that demand is likely to increase over the Plan period, particularly given planned levels of development and provides a positive context for consideration of applications. London currently imports 97% of primary aggregates but indigenous production is an important part of the mix of supply.

Furthermore, we support the requirement to maintain a landbank (as the apportionment) of permitted reserves throughout the Plan period, and recommend that some clarification is provided in terms of the overall tonnage that needs to be permitted over the Plan period (ie 0.7 million tonnes per annum x 25 = 17.5mt).

We recommend that policy SI10 (clause D) is extended to also apply the 'Agent of Change' principle to safeguarding of rail depots and other minerals infrastructure (in line with NPPF) that is applied to wharves through Policy SI15. The designing-in of mitigation to 'agent of change' development at an early stage (particularly to reduce noise impacts) is equally important for rail depots as wharves.

We recommend that Clause D should also not solely relate to the 'environmental impact of aggregates' but also to *'ensure the steady, adequate and sustainable supply'* (to properly reflect the purpose of the policy in enabling a 'reliable supply of construction materials referred to in para 9.10.1), and the safeguarding will be achieved in part through application of the Agent of Change principle.

User:	Port of London Authority

The PLA broadly supports this policy, particularly the emphasis on importing aggregates by sustainable transport modes; and the safeguarding of wharves with existing or potential capacity for aggregate distribution and/or processing to minimise the movement of aggregates by road. Part D (2) is in general conformity with paragraph 143 of the National Planning Policy Framework (NPPF) regarding the safeguarding of existing, planned and potential wharfage and associated storage, handling and processing facilities for the bulk transport by, sea or inland waterways of minerals, including recycled, secondary and marine-dredged materials.

User: Brett Group

Brett support the provision for safeguarding of resources, recycling facilities, and wharves and rail depots as set out in Policy SI10. Land won aggregates are also a significant consideration for Brett. Brett support the requirement to maintain a land bank of permitted reserves throughout the Plan period in line with the NPPF. We would, however, seek clarification in terms of the overall tonnage that is to be permitted over the plan period and would welcome confirmation of the assessment criteria used to arrive at the apportionment figure. The London apportionment based systems differs from the County based system used more widely throughout the country and brings unique challenges.

London currently imports circa 97% of primary aggregates but indigenous production is an important part of supply. Therefore, Brett broadly accept the continuation with the proposed apportionment levels but note that apportionment levels should recognise that demand is likely to increase over the plan period, particularly given planned levels of development.
The designing-in of mitigation, in line with ‘agent of change’ principles, to development at an early stage (particularly to reduce noise impacts) is equally important for railheads/ depots as it is for wharfs. Therefore, Brett would request that policy SI10 (part D) is extended to also apply the ‘Agent of Change’ principle to safeguarding of rail depots and other minerals infrastructure, in the same way as this has been applied to wharves through Policy SI15.

Recommend that part D should also not solely relate to the ‘environmental impact of aggregates’ but also to ‘ensure the steady, adequate and sustainable supply’ in line with NPPF guidance and to reflect and enhance the purpose of the policy in enabling a ‘reliable supply of construction materials referred to in para 9.10.1.

Brett welcome the approach that all Mineral Planning Authorities in London should identify and safeguard aggregate resources in Development Plans, including aggregate recycling facilities and flexibility is required in areas both captured by apportionment but also in those Boroughs not allocated and minerals apportionment.

User:	London Borough of Barnet

With increasing levels of flatted development, and known lower levels of recycling within flats (both new and old) compared with houses we question how the Mayor will be supporting boroughs to deliver on their waste targets Barnet in partnership with six other London Boroughs is producing the North London Waste Plan (NLWP). The Programme Manager for the NLWP has submitted comments on the DLP waste policies on behalf of the seven participating boroughs.

User:	Tarmac

The statement that: ‘All Mineral Planning Authorities in London should identify and safeguard aggregate resources in Development Plans, including aggregate recycling facilities’ is a prudent proposal that should be retained in the final plan. Policy SI10 (Aggregates) shows appropriate consideration for the safeguarding of railheads used for aggregates. However, clause D should be developed to apply the agent of change principle (as that in policy SI15) to ‘design out potential conflicts’ in adjacent developments, for example, the impact of noise at the adjacent development rather than limiting operations at railheads, wharves and other mineral product handling operations. Similarly, the safeguarding of wharves and railheads used for the distribution of aggregates (policy T7, Freight and Servicing, clause C) is supported. The encouragement of re-use and recycling of construction, demolition and excavation waste within London promotes circular economy principle, with the provision for at least seven years of supply of aggregates welcome to secure future growth.

User:	Tarmac

The statement that: ‘All Mineral Planning Authorities in London should identify and safeguard aggregate resources in Development Plans, including aggregate recycling facilities’ is a prudent proposal that should be retained in the final plan. Policy SI10 (Aggregates) shows appropriate consideration for the safeguarding of railheads used for aggregates. However, clause D should be developed to apply the agent of change principle (as that in policy SI15) to ‘design out potential conflicts’ in adjacent developments, for example, the impact of noise at the adjacent development rather than limiting operations at railheads, wharves and other mineral product handling operations. Similarly, the safeguarding of wharves and railheads used for the distribution of aggregates (policy T7, Freight and Servicing, clause C) is supported. The encouragement of re-use and recycling of construction, demolition and excavation waste within London promotes circular economy principle, with the provision for at least seven years of supply of aggregates welcome to secure future growth.

User: London Waste and Recycling Board (LWARB)

1. We support the need to encourage reuse and recycling of construction, demolition and excavation waste within London, and the target for reuse/recycling of this waste as set out in policy SI10 - Aggregates. We would like to understand where the target for 50% of the waste to be recycled as aggregates by 2020 has been derived from. As identified in paragraph 9.7.4, there are opportunities for higher order reuse of this material and we would not support a target which did not encourage more products and materials to be reused in this way before being used as aggregates.

User: London Waste and Recycling Board (LWARB)

1. We support the statement that London needs a reliable supply of construction materials to support continued growth. The increase in development in London will mean an increase in the need for building materials and transport associated with construction, and is likely to result in increased waste production and associated costs. It will be important that the impacts of such large scale construction are investigated and the opportunities to reduce these impacts, and benefit from reuse of materials are assisted. We would suggest the Mayor undertake a review of construction material demand within London for the next 20 years, and potential supply, with reuse of existing materials being paramount. We would welcome the opportunity to work with the Mayor on such a study.

User:	London Borough of Lambeth

A.4) Aggregates has a target of recycling 50% of CD&E waste as aggregates by 2020. It is not clear what the baseline recycling figure is and this will be required in order to monitor the effectiveness of the policy. Paragraph 9.10.3 references Policy SI7 and it is suggested that Policy SI10 is similarly referenced in paragraph 9.7.4.

There appears to be no mention of contamination land, which is referred to in the current London Plan. Should the new London Plan at least make clear that this is a matter for boroughs to address?

User:	London Borough of Haringey
The Council supports this policy.	

User:	London Cycling Campaign

Intro add:
of aggregates ***and reduce lorry movements***

Add:
3) ***encourage a reduction in empty-load lorry movements***

We note some developers use the same vehicles to deliver aggregate and remove landfill where this is practicable.

User:	London Borough of Brent
The Council supports this policy.	

User:	London Borough of Bromley
The policy is broadly supported.	

User: CBI

CBI members support the Mayor of London's guidance on aggregates (Policy SI 10), to ensure resources including recycling facilities, wharves and rail depots are safeguarded to minimise the movement of aggregates by road and maximise the movement of aggregates by sustainable modes.

CBI members would like to see further attention given to the role, protection, and reactivation of London's safeguarded wharves. This would help ensure the river Thames is used to its full potential for the transportation of freight. The move would also help tackle congestion and improve the efficiency of streets for essential traffic, therefore reducing carbon dioxide emissions and ensuring the river is utilised as an alternative form of transport. Furthermore, members suggest the guidance on reducing the environmental impact of aggregates should also ensure London retains a steady, adequate, and sustainable supply of aggregates.

User: Environment Agency

We note the policy. The target for construction, demolition and excavation waste at Point A.4), does not appear to account for recent changes to the waste regulations in regards to the deposit of wastes to land. We suggest that the GLA clarify their definition of ‘recycled’ waste in relation to excavated materials, particularly those materials from major construction projects.

Recommendation:

- Recommend that you review your definition of ‘recycled’ waste.

User:	Environment Agency

Regards Point B, we note that the Plan relies heavily on Boroughs in the West of London, including Hounslow and Hillingdon (as part of the West London Waste Authority area). Those Boroughs are subject to major projects, such as the enabling works for HS2, and potentially a 3rd runway at Heathrow), in addition to expected increases in housing and other growth, proposed by the Plan.

New sites for aggregates are generally difficult to identify, and development pressures in the London area may inhibit this further.

User: Environment Agency

We welcome Point D. related to site aftercare and restoration. Nonetheless the extraction of aggregates and other minerals may have adverse impacts on the water table, and upon public water abstractions. We therefore suggest that Point D is strengthened as below to safeguard London's water supplies, and support the delivery of the Thames River Basin Management Plan and associated Catchment Plans' actions.

Recommendation:

Add to Point D. a further point, requiring development plans to:
'3) ensure the protection of environmental water quality, and safeguard public water abstractions'.

User:	London Borough of Tower Hamlets

The aspiration for recycling C, D& E waste is supported, in principle, however the monitoring will prove to be challenging. The proposed policy is silent on emphasizing support for aggregates recycling facilities, subject to local amenity conditions.

User:	Royal Borough of Kingston
Support.	

User:	London Borough of Hounslow
LB Hounslow supports this policy	

User: West Sussex County Council

Minerals

1. Part A of Policy SI10 sets out a strategy for providing an adequate supply of aggregates in London, largely through encouraging re-use and recycling, extracting land-won aggregates, and importation by sustainable transport methods. As large amounts of construction, demolition and excavation waste are currently exported from London for processing, it is questionable whether London has the capacity in place to produce sufficient levels of recycled aggregates. Furthermore, it is questioned why the wording 'steady and adequate' supply is not used, as per the NPPF.
2. The County Council supports the references to safeguarding resources, aggregate recycling sites, and also wharves and railheads. However, it is questioned why resources and recycling sites are mentioned together in clause C of Policy SI10, whereas wharves are identified in clause D2. All aggregate/minerals infrastructure should be set out within one clause, with mineral resource in another clause. It is also questioned why there is no reference to other important minerals infrastructure, such as asphalt, mortar, on concrete sites. The safeguarding of these is vital to ensure that the materials are provided for the planned levels of construction in London (and to be complaint with NPPF paragraph 143).
3. Clause D1 of Policy SI10 specifically references a reduction of the environmental impact of aggregates through ensuring appropriate use is made of conditions to deal with aftercare, restoration, and re-use of mineral sites. However, the policy would be strengthened by requiring the best use of conditions to reduce the environmental impact during operations. Furthermore, this should also address the impacts of local communities, not just the environment.

User:	London Borough of Southwark

The council recommends the policy should note high archaeological impact of mineral extraction and mention assessment/mitigation requirement in Part D. It is requested that in addition to Part D it is stated Development Plans should require adequate evaluation and mitigation of archaeological impact because minerals extraction can be immensely destructive of archaeological remains over large areas. Gravel deposits were particularly attractive for early agricultural communities as a result of which such deposits are known to be rich in archaeology along the entire length of the Thames Valley.

User:	London Borough of Redbridge

The Council supports comments made by the London Aggregate Working Party (LAWP) in relation to policy SI10.

User: London Borough of Havering

Chapter 9 : Sustainable Infrastructure

Aggregates

Havering has borne the brunt of extensive mineral working for many years especially in the south of the borough. The adverse impacts have included noise, dust, vibration, traffic movements as well as despoiling of the rural Green Belt landscape. Some parts of the south of the borough have been severely affected by the cumulative impact of mineral working taking place on consecutive parcels of land with consequent long-lasting adverse impacts on amenity for residents.

Havering objects that the draft London Plan repeats the land-bank apportionment figures for minerals set out in the current London Plan (March 2015) in **Policy SI10 (Aggregates)** because this will result in the areas in the south of the borough continuing to suffer the adverse impacts arising from mineral working.

Havering welcomes that **paragraph 9.10.2** identifies that there is potential for mineral working elsewhere across London beyond the four boroughs identified in Policy SI10 (Aggregates). However, the draft London Plan should go much further so that these unidentified areas bear more of the burden for minerals working so that Havering can be released from the pressure to supply minerals. Similarly, the Mayor should take stronger steps to encourage the re-use and recycling of minerals (as identified in **paragraph 9.10.3).**

User:	Suffolk County Council

The protection afforded to secondary materials and waste management in policies E4 and E5 is welcome and benefits the vitality of the wider waste supply chain but, in order to link with the safeguarding policy on aggregates (SI10), reference should also be made to aggregates within these policies.

User: London Borough of Richmond Upon Thames

Support the circular economy and waste reduction measures. Point 3 regarding the target of zero biodegradable or recyclable waste to landfill by 2026 should be qualified & clarified. Presumably this applies to all waste, not just household or local authority collected waste. How is “recyclable waste” defined? Does “zero” really mean “none whatsoever”? How would this be applied and enforced? How would any of London’s Waste Collection Authorities (WCA’s) still relying on landfill for residual waste, establish whether it contains any biodegradable or recyclable waste? In practice this could amount to the same thing as a complete ban on landfill for household and similar wastes as there is always likely to be at least some bio or recyclable waste remaining within it. There would always need to be a contingency permitted to deal with events such as plant/incinerator breakdown.

Regarding criteria 4a there is a risk that the Mayor may seek to amend proposed borough contracts if he thinks they are not in conformity with the 65% recycling target by 2030. This could potentially increase contract costs. 65% recycling of household waste would be very difficult to achieve in London. (Previous target was 60% by 2031).

It isn’t clear how much each borough would be expected to contribute towards the achievement of this target but it could be expected to increase external to reduce the frequency of residual waste collections, to switch to small capacity wheeled bins for lowrise refuse and to introduce separate food waste collections for highrise.

Improved regulation of commercial waste management to improve compliance with pretreatment, waste hierarchy & rules against mixing hazardous & nonhazardous wastes has the potential to greatly improve recycling rates achieved for other similar wastes.

Regarding criteria 4b WCA’s have no duty to collect construction, demolition and excavation waste but the Council collects some via flytip clearance & some via the chargeable DIY waste service; as we deal with such a small part of the overall tonnage I doubt this target would really affect the Councils directly. However rules relating to charging for DIY waste might need clarification in order that it is clear that the disposal of such waste is chargeable.

Design criteria 5 is supported in principle with the possible exception of separate food waste storage provision in highrise as the consistency agenda only goes as far as extending this to all lowrise.

The plan could perhaps push highrise to having food waste macerators instead (subject to water company support) which could result in significant disposal savings. The understanding is that this policy could have a real impact on the determination of planning decisions and therefore on developers' willingness to propose adequate arrangements. This may need to link to the consistency agenda so that developments are designed to cope with likely future collection service configurations.

There are many new residential units that are very limited in terms of space and therefore

the pressure to build in space for recycling may conflict directly with pressure to accommodate more living units.

Criteria B1 aiming for zero waste is not consistent with the 95% target stated in 4B for

demolition waste.

In Criteria B3, opportunities for managing as much waste as possible on site Food waste macerators could be encouraged as could home composting provision in gardens and small scale Anaerobic Digestion in larger developments to deal with food waste on site.

Criteria B4 on adequate recycling storage space is supported but it should also recognise storage for general waste collection.

Regarding criteria B5, clarification is sought on whether this requirement is for the project from conception and thereafter throughout it operational life. Both are important however the longer term servicing requirements will have the most impact for the Council.

User:	London Borough of Harrow
The Council supports this policy.	

User: London Borough of Havering

Paragraph 9.10.2

Please see Annexe 1 submitted with the Havering response letter as this sets out commentary on the importance of exploring the scope for mineral working in areas outside the four boroughs identified in the policy for land bank apportionment purposes. This is in recognition of the harm that has been done to Havering's Green Belt and the adverse implications from working minerals such as environmental damage, loss of amenity for residents and traffic problems.

Havering recognises that minerals can only be worked where they occur and that London needs an adequate supply of construction materials. The scope for minerals winning in areas outside the four boroughs identified for apportionment purposes in paragraph 9.10.2 is welcomed and the Mayor should be much more proactive in seeking to ensure that opportunities from potential sources in areas like the Lee Valley are maximised. This would be a more equitable way than concentrating minerals operations in boroughs like Havering which have borne the brunt of extraction for many years and suffered the adverse environmental and traffic impacts

User:	Hertfordshire County Council

The Plan contains policies to safeguard aggregates resources and aggregates infrastructure (including aggregates recycling, railheads, wharves), the maintenance of a landbank of land won aggregates, encouraging re-use and recycling of construction, demolition and excavation waste within London, requirements to reduce the environmental impacts of aggregate. Such policies are in-keeping with those of the County Council and are therefore welcomed and supported as an adjoining Minerals Planning Authority.

User:	London Borough of Enfield

Policy SI10 ‘Aggregates’ has an overambitious 95% recycling target by 2020. It would be useful if the policy was more specific in defining what is expected of local authorities regarding potential areas of extraction.

User:	Just Space

SI10 Aggregates

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

User:	Association of Local Government Archaeological Officers (ALGAO)

Request addition to Part D to say that Development Plans should require adequate evaluation and mitigation of archaeological impact because minerals extraction can be immensely destructive of archaeological remains over large areas. Gravel deposits were particularly attractive for early agricultural communities as a result of which such deposits are known to be rich in archaeology along the entire length of the Thames Valley, most notably in London the plateau around Heathrow and in North East London.

User:	Construction Products Association

1. We fully support the focus on ensuring the essential supply of sufficient aggregates to enable London to reach its construction ambitions.

User: London Aggregate Working Party

I wish to make a representations on the London Plan on behalf of the London Aggregates Working Party (LAWP) principally about the policy on aggregates (SI10). The Working Party also wishes to comment on other policies (SI15, T7) that address infrastructure issues involved in aggregate supply.

The London Aggregates Working Party (LAWP), comprises representatives from the aggregates industry, the Greater London Authority, the London Boroughs, Port of London Authority, and Crown Estate. It is tasked with monitoring aggregate supply in the London and accordingly advises local authorities and Government on aggregate policy. Aggregates are an essential component of the construction sector including housing, regeneration projects and infrastructure. As such, a steady and adequate supply of aggregates underpin the objectives of the London Plan.

The LAWP supports the London Plan's approach to aggregates (SI10), but wishes to make some observations on particular points relating to the following policies. Suggested rewording of the policy wording is included.

Aggregates SI10 (A)

The overall thrust of this policy is welcomed as it provides the strategic context for the main components of the supply of aggregates to London. However, the reference in (1) to 'encouraging re-use and recycling construction, demolition and excavation waste …' (CDE waste) should reference 'recycled aggregate'. Moreover, the details on targets would be better placed in SI10(B} while the 95% recycling target for CDE waste is entirely misplaced as this is a waste planning matter.

It is noted the target in (A) for recycled aggregate has been reduced to 50% of CDE waste from the 90% target in the existing Plan. Even so this is still a challenge as the target is very much higher than the current recycled aggregate estimates as reported to LAWP last year in the Aggregates Monitoring report 2016 (AM 2016). This estimated recycled aggregate production in 2016 as between 12% and 25% of CDE waste. Moreover, the data on recycled aggregate production and indeed CDE waste processing is very unreliable, which presents issues for monitoring targets, as LAWP has found in conducting the annual Aggregate Monitoring surveys.

It is further queried whether there is capacity within the Capital to process all the arisings of CDE waste. The estimates produced by SLR in 2017 for the GLA (see London Plan – Waste Forecasts and Apportionments) indicate that by 2041 arisings will be between 9.75 and 13 million tonnes per year and this would require a significant amount of land to process. Currently a large proportion of this waste is exported to neighbouring counties and whether the processing of all this material within London is feasible is not stated. It is noted that the policy's supporting text (9.10.5) notes that quarries could be used for CDE waste processing. It is appreciated there are opportunities for site recycling operations with major construction projects and possibly elsewhere. However, these present limited opportunities.

An alternative approach, as recommended by SLR, would be to not state 'targets' or 'apportionment'. The data on CDE waste in London is hitherto unreliable so the monitoring of a target-based policy is problematical. Instead there is some sense in the SLR recommendation to focus the policy wording more on local plans promoting and identifying sites for recycled aggregate facilities in association with mineral operations and major construction sites. Moreover, it should be acknowledged by the London Plan, in the supporting text, that London will continue to be dependent on sites outside the Capital for producing recycled aggregate from CDE waste.

Accordingly, it is recommended that SI10 (A) be revised thus (NB the ~~deletions~~):

A. An adequate supply of aggregates to support construction in London will be achieved by:

1. encouraging re-use and recycling of construction, demolition and excavation waste as recycled aggregate within London

2. extracting land-won aggregates within London

3. importing aggregates to London by sustainable transport modes

~~4. meeting the target of 95 per cent recycling/re-use of construction, demolition and excavation waste by 2020 and recycling 50 per cent of that waste as aggregates by 2020~~

Aggregates SI10 (B)

This aspect of SI10 is welcomed in principle as a continuation of the current framework. However, the opportunity should be taken to expand it to set out the requirements for the other components of aggregate supply. SI10 currently makes no provision for aggregate wharf and depot and recycled aggregate facilities.

With regard to land-won aggregates it should be noted that this ‘apportionment’ has not been achieved in recent years as the table below (based on AM 2016 data) indicates.

	Apportion’ (Total)	Apportion’ (Annual)	Sales 2016	Av (3 yr.) Sales	Av. (10yr) Sales	Landbank (years)
Havering	1.75	0.25	c	0.126	NA	5.8
Redbridge	0.7	0.125	c	0	NA	0.1
Hillingdon	1.75	0.25	c	0.217	NA	2.3
Hounslow	0.7	0.125	c	0	NA	0
London	5	0.7	0.35	0.34	0.56	2

(figs in tonnes millions)

However, recent permissions and some evidence of potential capacity indicates the landbank could be achieved in the short to medium term. However, the policy's soundness does depend on its deliverability until 2041. The proposed London landbank equates to 17 million tonnes of sand and gravel (approximately 5.5mt. each for Havering and Hillingdon and 3mt. each for Hounslow and Redbridge) over the whole plan period. Whether the resource in the four Boroughs could sustain this is not explained. As of the end of 2016, reserves for London were 1.3 million tonnes with about further five million tonnes approved or pending approval since that date. Accordingly, a further 10 million tonnes over the plan period needs to be identified in local mineral plans. It would be helpful if the supporting text stated the overall tonnage requirement for each borough as well as the annual production expected to be provided across London.

As this part of the policy sets out the provision of aggregate it should include statements on the provision of other facilities. The reference to CDE waste recycling would be better not include targets as discussed above, but be supportive of the production of recycled aggregate.

Accordingly, it is recommended that SI10 (B) be revised thus (NB the ~~deletions~~ and insertions in red):

B. Development Plans should:

(a) make provision for the maintenance of a landbank (i.e. seven years' supply) of at least five million tonnes of land-won aggregates up to 2041, in particular through a landbank apportionment of:

1. at least 1.75 mt to London Borough of Havering

2. at least 0.7 mt to London Borough of Redbridge

3. at least 1.75 mt to London Borough of Hillingdon

4. at least 0.7 mt to London Borough of Hounslow.

(b) ensure sufficient capacity of aggregate wharves and aggregate rail depots is maintained/expanded to ensure a steady an adequate supply of imported and marine aggregates to London.

(c) support the production of recycled aggregate and where practicable expand capacity at/or: adjacent to aggregate wharves and rail depots; quarries during their operational life; within/or adjacent to major construction projects and; other suitable locations.

Aggregates SI10 (C)

A policy safeguarding aggregate resources is welcomed. However, the reference to aggregate recycling here is confusing as safeguarding resources and safeguarding aggregate infrastructure are separate issues. The latter is addressed in the recommended revised SI10 (D2) below and moreover in T7 (C) to which there should be a cross reference in the supporting text.

A further problem with the effective operation of aggregate infrastructure is subsequent development of sensitive development land uses in their vicinity. Accordingly, the 'Agent of Change' principle, referred to in Policy SI15 (H) and paragraph 9.15.6 is welcomed although it should be applied not only to safeguarded wharves, but extended to apply to rail depots and rail links, and other minerals infrastructure eg concrete batching and asphalt plants, that should also be safeguarded in line with NPPF para 143.

Accordingly, it is recommended that SI10 (C) be revised thus (NB the deletions and insertions in red):

C. All Mineral Planning Authorities in London should identify and safeguard in Development Plans:

1. sand and gravel resources from development that would otherwise sterilise future potential extraction

2. existing, planned and potential rail heads, rail links to quarries, wharfage and associated storage, handling and processing facilities for the bulk transport by rail, sea or inland waterways of minerals, including recycled, secondary and marine-dredged materials along with existing, planned and potential sites for concrete batching, the manufacture of coated materials, other concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material (as required by NPPF para 143)

Aggregates SI10 (D)

The latter part of (D2) above refers to minimising road movements that would be best included with the supporting text

On the other hand, there are merits in the inclusion within this policy of a requirement for the imposition of conditions relating to ongoing amenity, environmental and traffic impacts that are peculiar associated with operational mineral developments as set out in SI15

D. To reduce the environmental impact of aggregates facilities, Development Plans should:

1. ensure that appropriate use is made of planning conditions dealing with aftercare, restoration and re-use of minerals sites following extraction, with particular emphasis on promoting green infrastructure, especially biodiversity

2. ~~safeguard wharves and/or railheads with existing or potential capacity for aggregate distribution and/or processing to minimise the movement of aggregates by road and maximise the movement of aggregates by sustainable modes.~~

ensure planning conditions are imposed on aggregate facilities to so that noise, dust and traffic impacts are effectively controlled.

3 Ensure new development in proximity to safeguarded sites are designed to avoid and mitigate potential conflicts, in line with the Agent of Change principle.

Aggregates SI10 Supporting Text

With regarding to the supporting text there are some further points:

9.10.2: This text about needs to be expanded to illustrate the total tonnage of 17 million tonnes sand and gravel required over the period to 2041 and that of each of the aggregate producing boroughs. Alternatively, there should be least an explanation of the landbank being least 7 years supply (0.7mtpa) as the current wording is open to differing interpretations.

9.10.4: Reference to minimising road movement in D2 would be better placed here. There should also be an explanation that associated with safeguarding is the impact of redevelopment of neighbouring land on safeguarded sites as set out in SI15. A justification for supporting the expansion of these facilities in appropriate circumstances should be added as the Capital will become increasingly dependent on imports and marine aggregates

9.10.5: The reference to depots needs clarification. Is it rail depots/ rail heads or other aggregate facilities e.g. recycled aggregate facilities, concrete batching plants? Suggested locations for the latter are in the recommended revised policy and an explanation would be helpful. Although there are merits for using former quarries for recycled aggregate production the invariable Green Belt location of London quarries is an impediment to achieving this beyond the life of the quarry. There should be an acknowledgement that maximising recycled aggregate production from London's CDE waste will depend, in part, on facilities in neighbouring mineral planning authority areas.

9.10.6: It is unclear which of the boroughs should still be producing Local Aggregate Assessments (LAA). Under the present London Plan it is only the four sand and gravel producing boroughs that are not covered by a joint LAA. The proposed wording implies others with ‘aggregate facilities’ would have to prepare a LAA. Indeed, all the London Boroughs are required by the NPPF to prepare a LAA. singly or jointly. An option could be that one joint LAA is prepared for all of London in partnership with the boroughs and jointly funded by all the parties.

User:	London Environment Directors' Network (LEDNet)

Policy SI10 Aggregates

A An adequate supply of aggregates to support construction in London will be achieved by:

4) meeting the target of 95 per cent recycling/re-use of construction, demolition and excavation waste by 2020 and **reusing or** recycling 50 per cent of that waste as aggregates by 2020.

User: North London Waste Plan

16 SI10 Aggregates

Policy SI10.A.4) Aggregates has a target of recycling 50% of CD&E waste as aggregates by 2020. It is not clear what the baseline recycling figure is and this will be required in order to monitor the effectiveness of the policy.

User:	North London Waste Plan
Paragraph 9.10.3 references Policy SI7 and it is suggested that Policy SI10 is similarly referenced in paragraph 9.7.4.	

User:	Surrey County Council
We strongly support the safeguarding of wharves and/or railheads as set out in Policy SI10.	

User: The Crown Estate

The Crown Estate owns almost all of the sand and gravel resources lying off the coast of England and Wales, including the Thames estuary. We take an active approach to managing this natural asset effectively and sustainably to deliver value over the long term, including awarding and managing commercial agreements for extraction. In that capacity, we note that the Policy SI10 on Aggregates highlights the importance of ensuring there is an adequate supply of aggregates to support construction in London.

The marine aggregate sector is of significant importance to the continued sustainable and economic growth and development of London. Marine aggregate imports into wharves in the Thames estuary exceeded 8.5 million tonnes in both 2016 and 2017, and have the capacity to grow in both the short and long-term in response to increasing demand and as alternative sources become less attractive. Marine aggregate currently represents around 50% of all primary aggregate used in London, and therefore plays a vital role in supporting the construction sector in this region, for both housing and infrastructure.

Policy SI10 also makes reference to safeguarding both the aggregate resources and the wharves and/or railheads for distribution of aggregates. We recognise the challenges associated with managing competing land uses in London where land is limited and in high demand, however, we see that the continued safeguarding of wharf and transport infrastructure to enable a sustained supply of marine aggregate into London becomes ever more essential to its future growth. The continued safeguarding of wharf facilities also, of course, provides notable opportunities to contribute to improved air quality in London by supporting marine and river transport, thereby significantly reducing road traffic.

User:	The Forestry Commission

We welcome:

Links to GI and natural environment in Chapter 5 social infrastructure

User:	London Borough of Sutton
SUPPORT. The London Borough of Sutton supports Policy SI10.	

User: North London Waste Plan

Policy SI10 Aggregates	The approach to providing new facilities on aggregates sites would be through ancillary development, This would mean that such facilities would be temporary as they would be linked to the life of the quarry, This is an important point that needs to be picked up as quarries tend to be within the greenbelt and any built waste development for recycling facilities would not be considered appropriate in such locations.

User: North London Waste Plan

9.10.5	See above. A better understanding of quarry restoration and controls in the greenbelt are required in relation to this paragraph’s statement about use of old quarries .

User: London Borough of Newham

Policy SI 10 Aggregates

LBN have no comment on this policy as it is not a Minerals Planning Authority other than to submit that it is not appropriate for the recycling target to include excavation waste which is of a very different nature and not achievable: it is noted that the Technical report states that 3.7mT of inert waste went to landfill in 2015. This is because, as a result of the Methley decision, the Environment Agency has had to change its regulations covering waste recovery on land, and what was previously considered recycling is now considered landfill. As such, schemes like Wallasea Island which took construction spoil from Crossrail are now less likely to happen. It is suggested instead that the management of Excavation waste should be specifically listed as a topic to be discussed with the WSE RTABs in paragraph 9.8.3.

User:	Central Bedfordshire

Minerals and Waste

• We welcome and strongly support the overall strategy for minerals and waste, in particular:
• The provision for safeguarding aggregate wharves and railheads (PoliciesT7, SI10 and SI15);
• The emphasis on recycled aggregates, whilst at the same time seeking to maintain aggregate landbanks (Policy SI10);
• The safeguarding of aggregate resources (Policy SI10)
• The reduction and minimisation of waste, aiming at a circular economy (Policy S17);
• Waste self-sufficiency by 2026 (Policy SI8);
• The safeguarding of waste management sites (Policy SI9);
• The ‘Agent of Change’ principle (Policy D12) which will assist in safeguarding existing mineral and waste sites.

User: Commercial Boat Operators Association

CBOA fully agrees with the statements in Policies T1, T3, T7, SI10 where use of water transport, land availability for waterside access for freight/deliveries, wharf protection and modal shift to water is mentioned. However the wording, in particular the use of the verb ‘should’ where these policies are concerned, is not seen as being strong enough or sufficiently binding.

This is on two counts:-

1.It can be easily ignored and reasons easily found and quoted for not using water transport

2.There needs to be more direction, perhaps centrally, to insist that the water transport option is not only investigated but actually put into operation.If simply left to market forces, it will not happen.In our experience over many years, water transport is very rarely used if there is no form of coercion to use it.This is true for both the construction industry and other delivery or small freight operations.Also, local authorities are sometimes wary of being too dictating about use of water transport – they need support to advocate it.

User:	London Borough of Ealing

Aggregates
(SI10 9.10.5)

The text references ‘preferred industrial locations’ although the associated industrial land policies no longer use such categorisation.

User:	Historic England

Minerals extraction generally has a high archaeological impact. We recommend the policy refers to assessment and mitigation of these impacts.

Amend part D to refer to the need for assessment and mitigation of any impacts on archaeology.

User: Dr Peter Osmon

I am writing in to register my support, specifically, of London Plan policies regarding Transport of Aggregates: S10 and T7
You should know that London Borough of Barnet Planning Application 17/5761/EIA | Use of railway land for the transportation of aggregates Envisages approximately 1HGV per minute, carrying Aggregates, will enter/return A5 in Cricklewood NW London from/to railway sidings.

This Application is evidently contrary to these policies:
Policy S10 Transport of Aggregates
9.10.3 Aggregates are bulky materials---minimise their movement especially by road.

Policy T7 Freight and Servicing
E. Development proposals for new -----distribution facilities----should be supported provided that they
1.deliver mode shift without adversely impacting passengerservices I am concerned about the consequences of Barnet Planning Application 17/5761/EIA for TfL bus services nos: 16, 32, 189, 226, 245, 260, 266, 316, 332, 460 at the A5 (Cricklewood Broadway) A??? (Cricklewood Lane) intersection. This intersection is already a bottleneck due to the narrowness of Cricklewood Lane and it seems likely that the proposed flow of HGVs would have disastrous consequences for the reliability of these ten bus TfL bus services.

User: Aggregate Industries UK Ltd

Draft Policy SI10, Aggregates, and Supporting Text

As per the current corresponding London Plan Policy 5.20, Aggregates, and supporting paragraph 5.94 the supporting text to draft Policy SI10 should specifically confirm that Boroughs must safeguard both existing, planned and potential sites for all the uses and activities identified for safeguarding in paragraph 142 of the NPPF. Ideally this should be referenced in the policy, with the supporting text providing further clarification.

The following amendments are recommended:

Policy SI10 Aggregates

C. All Mineral Planning Authorities in London should identify and safeguard aggregate resources in Development Plans for the full range of uses and activities identified for safeguarding in paragraph 143 of the NPPF and including aggregate recycling.

D. To reduce the environmental impacts of aggregates, Development Plans should

1) ensure that …..

2) safeguard wharves and/or railheads with existing or potential capacity for aggregates distribution and/or processing and/or associated minerals plant to minimise the movement of aggregates by road and maximise the movement of aggregates by sustainable modes.

Supporting Para 9.10.14

Boroughs should protect existing, planned and potential sites for aggregate extraction, aggregate processing and other associated mineral plant and transportation and specifically for all the uses and activities identified for safeguarding in paragraph 143 of the NPPF. Existing and future wharf capacity is essential, especially for transporting marine-dredged aggregates, and should be protected in accordance with Policy SI15 Water transport. Equally important are railway depots for importing crushed rock from other parts of the UK, as well as receiving sand and gravel, the majority of which is marine dredged and landed at wharves either within Greater London or Kent. Railheads are vital to the sustainable movement of aggregates and boroughs should protect them".

User:	Hornsey & Wood Green Labour Party
Support	

User:	Mr Sydney Charles
Support	

User: Cemex UK Ltd

Draft Policy SI10, Aggregates, and Supporting Text

As per the current corresponding London Plan Policy 5.20, Aggregates, and supporting paragraph 5.94 the supporting text to draft Policy SI10 should specifically confirm that Boroughs must safeguard both existing, planned and potential sites for all the uses and activities identified for safeguarding in paragraph 142 of the NPPF. Ideally this should be referenced in the policy, with the supporting text providing further clarification.

The following amendments are recommended:

Policy SI10 Aggregates

C. All Mineral Planning Authorities in London should identify and safeguard aggregate resources in Development Plans for the full range of uses and activities identified for safeguarding in paragraph 143 of the NPPF and including aggregate recycling.

D. To reduce the environmental impacts of aggregates, Development Plans should

1) ensure that …..

2) safeguard wharves and/or railheads with existing or potential capacity for aggregates distribution and/or processing and/or associated minerals plant to minimise the movement of aggregates by road and maximise the movement of aggregates by sustainable modes.

Supporting Para 9.10.14

Boroughs should protect existing, planned and potential sites for aggregate extraction, aggregate processing and other associated mineral plant and transportation and specifically for all the uses and activities identified for safeguarding in paragraph 143 of the NPPF. Existing and future wharf capacity is essential, especially for transporting marine-dredged aggregates, and should be protected in accordance with Policy SI15 Water transport. Equally important are railway depots for importing crushed rock from other parts of the UK, as well as receiving sand and gravel, the majority of which is marine dredged and landed at wharves either within Greater London or Kent. Railheads are vital to the sustainable movement of aggregates and boroughs should protect them".

User: DB Cargo UK Ltd

DB Cargo supports the requirement for an adequate supply of aggregates to support construction in London to be achieved, and the reference to importing aggregates to London by *sustainable transport modes*.

DB Cargo also supports the requirement for all Mineral Planning Authorities in London to identify and safeguard aggregate resources in Development Plans, including aggregate recycling facilities.

DB Cargo also supports the requirement for Development Plans to safeguard wharves and/or railheads with existing or potential capacity for aggregate distribution and/or processing to minimise the movement of aggregates by road and maximise the movement of aggregates by sustainable modes.

DB Cargo support the reference in supporting text 9.10.4 to the importance of railway depots for importing crushed rock from other parts of the UK and recognition that Railheads are vital to the sustainable movement of aggregates and boroughs should protect them.

However, DB Cargo consider that these references should be included in Policy SI10, rather than in supporting text.

User:	Tarmac

Tarmac supports policy SI10 for the reasons already outlined. Indigenous supply to assist London is meeting its building material needs is important to meet planning policy generally but also that London is seen to be doing its bit for delivering its local supply requirements.

User:	Taylor Wimpey UK

Policy SI10 Aggregates

We are supportive of policies that plan for adequate supplies of aggregate for development in London.

User:	Chartered Institute for Archaeologists

The natural environment, landscape and parks are all created from land management and incorporate human activities over many centuries and are an archaeological as well as natural resource. The Green Infrastructure Plan G3 should demonstrate the wealth of historic environment incorporated in our green spaces and woodlands. A similar consideration should extend to policies for mineral extraction (SI10) and burial grounds (S7).

User: Essex County Council

The policy principles are supported but the approach to apportionment does not seem to reflect that advocated in the NPPF. The approach of stating a minimum amount of permitted reserve is supported in order to provide certainty in a level of supply but clarification should be provided within the London Plan as to why these particular apportionments are considered to be appropriate. The Local Aggregate Assessment for London 2016 states that "…the current review of the London Plan, will re-consider the apportionment in the light of the requirements of the NPPF and PPG and the development needs of London." It is unsure whether this reconsideration has occurred or has been appropriately documented. It is noted that the current landbank in London stood at 2 years in 2015, as reported by the Local Aggregate Assessment 2016.

Proposals to safeguard wharves with existing or potential capacity for aggregate distribution and/or processing to ensure more sustainable distribution and use of aggregate is supported. In light of the constrained supply of mineral within London itself, safeguarding the means to import aggregate is critical to maintaining an appropriate supply.
There are currently no safeguarding provisions in the London Plan relating to mineral that is yet to be extracted. Whilst opportunities for wholesale prior extraction and therefore the likelihood of mineral sterilisation may be more limited in London than elsewhere, the London Plan should still advocate this practice in accordance with sustainable mineral principles. Support could also be given to the requirement to support applications with Mineral Resource Assessments to establish the quality of material that may otherwise be sterilised. These assessments could also explore the potential to use indigenous material for the construction of the proposed development itself in order to off-set the amount of mineral that would otherwise be bought into the site.

User:	East of England Aggregates Working Party

It is noted that **Policy S/10** (Aggregate apportionment and safeguarding) supports an adequate supply of aggregates to support construction in London, seeks to maintain landbanks and safeguard aggregate resources including aggregate recycling facilities. It also seeks to safeguard wharves and /or railhead facilities with existing or potential capacity for aggregate distribution. EEAWP positively supports this policy and also **policy T7** (Freight and Servicing) and **policy S/15** (Water Transport) which also support the safeguarding of wharves and railhead facilities.

User: South East England Aggregates Working Party

London Plan Consultation – Policy SI10

I wish to make some representations on the London Plan on behalf of the South East England Aggregates Working Party principally about the policy on aggregates (SI10).

The South East England London Aggregates Working Party (SEEAWP), comprises representatives from the aggregates industry, the mineral planning authorities in South East England and the Crown Estate. It is tasked with monitoring aggregates supply in South East England and accordingly advises local authorities and Government on aggregate policy. Aggregates are an essential component of the construction sector including housing, regeneration projects and infrastructure. As such, a steady and adequate supply of aggregates underpin the development objectives of the development plans in South East England and neighbouring areas.

SEEAWP has noted the comments made by the London Aggregates Working Party (LAWP) and fully support these. It would however, would add that the London Plan should recognise that the Capital is reliant on imports from the surrounding regions to satisfy its aggregates needs, and, therefore there should be an addition to Policy SI10 A along the lines of

“4. Encouraging sufficient capacity in aggregate sites and facilities outside London, to ensure that London’s import needs are met.”

It is hoped the comments are helpful and the Secretary is prepared to attend the EiP if the Inspector wishes aggregates to be discussed.

User:	London Waste Planning Forum

16 SI10 Aggregates
Policy SI10.A.4) Aggregates has a target of recycling 50% of CD&E waste as aggregates by 2020. It is not clear what the baseline recycling figure is and this will be required in order to monitor the effectiveness of the policy. Paragraph 9.10.3 references Policy SI7 and it is suggested that Policy SI10 is similarly referenced in paragraph 9.7.4.

Policy SI11 Hydraulic fracturing (fracking)

User:	Mrs Marilyn Mason

Totally support ban on fracking in London - unsuitable in London (or anywhere) because of risks to water supply, destruction of local environments, and contribution of non-remnewable energy to greenhouse gas emissions

User:	Fuel Poverty Action

Fuel Poverty Action strongly endorse your decision not to support fracking in London. We have consistently countered the claim that fracking will bring down fuel bills - a claim that even the industry itself has had to admit is not correct. Like many thousands of other Londoners we would oppose any attempt to frack here in every way we can.

User:	Mr Chris Gannaway
Strongly support this policy	

User:	London Forum of Amenity and Civic Societies

London Forum supports this policy.

User:	London Assembly Green Party Group

I support this policy. Even outside London, fracking is a risky and non-beneficial enterprise that all areas should resist.

User:	London Borough of Hammersmith and Fulham

This paragraph notes that should any fracking proposal come forward in London then it is highly likely that it would be located on Green Belt or Metropolitan Open Land. It is agreed that this seems to be the most likely scenario and this is one of the reasons why the council does not want to see policies in the London Plan that encourage fracking.

The OPDC has previously proposed a policy in their Local Plan on Oil & Gas Development in the OPDC Area which we raised concerns about.

User:	London Borough of Hammersmith and Fulham

This paragraph outlines a range of issues that would need to be considered if a proposal for fracking came forward. Given that the Policy directs refusal of fracking proposals, the presentation of the information here should be amended to change the emphasis as the Policy does not envisage any circumstances where fracking would be acceptable in London.

User:	London Borough of Hammersmith and Fulham

Similar comment as for 9.11.4. This paragraph provides guidance on community engagement where a proposal comes forward for fracking. The Policy completely discourages this, so it seems contradictory to provide guidance on how to facilitate fracking proposals compliance with the Community Engagement Charter.

User:	London Borough of Hammersmith and Fulham

(Fracking) - This policy of advocating refusal of development proposals that involve exploration, appraisal or production of shale gas via fracking is supported.

User:	London Borough of Hammersmith and Fulham

The Mayor’s approach is welcomed as exploration for and use of shales gas is not consistent with the Plan’s policy approach to reducing climate change emissions and minimising environmental impacts of development.

User:	London Borough of Hammersmith and Fulham

We note the evidence presented that the British Geological Survey has previously concluded that “there is no significant Jurassic shale gas potential in the Weald Basin” and that it is highly unlikely that there is any site that is geologically suitable for a fracking development in London.

User:	London Borough of Hammersmith and Fulham

We note the evidence presented that the British Geological Survey has previously concluded that “there is no significant Jurassic shale gas potential in the Weald Basin” and that it is highly unlikely that there is any site that is geologically suitable for a fracking development in London.

User:	Mr Geoffrey Lean

Any proposal to frack under London would be simly ludicrous and should receve short shift. There is no evidnece that there are the gas or oil resources to be fracked. And if here were, fracking would absorb much needed water supplies and risk contamination, and would increase supplies of fossil fuels, and thus carbon dioxide emissions.

User:	Joan Taplin

I believe that everyone in London has the right to breathe clean air, have access to nature and to benefit from clean energy. I am therefore pleased to see policies in the new London Plan which seek to address these important environmental issues. These include policies to protect our Greenbelt and Metropolitan Open Land, a ban on fracking, and a commitment to London becoming zero carbon

User:	London Borough of Haringey
The Council supports this policy.	

User:	London Borough of Brent

The Council supports this policy and is in agreement that development proposals for exploration, appraisal or production of shale gas via hydraulic fracturing in London (including Brent) should be refused.

User:	London Councils

London Councils welcomes the policy on fracking as being well aligned with the national and London targets around climate change and local environmental quality. In particular the note in the policy that it is highly unlikely a suitable site would occur in London due to its geological structure is useful.

User:	London Borough of Tower Hamlets
Whilst not of relevance for LBTH, we are supportive of this policy.	

User:	Royal Borough of Kingston

The policy seeks to prohibit a certain type of legal land operation, in direct conflict with chapter 13 of the NPPF which encourages energy from minerals and the regulatory framework which controls the licensing of fracking. RBK considers that the policy should focus on how such applications should be considered if they were forthcoming.

User:	Ministry of Housing, Communities & Local Government

In addition, your draft Plan should be in line with other national government policies. There are clear areas where this is not currently the case, for example, your proposed approach on shale gas extraction. As you are also aware, the Government is currently in the process of considering responses received to recent consultations on a draft Airports National Policy Statement (NPS), which set out the Government's preferred location and scheme to deliver new airport capacity via a new Northwest Runway at Heathrow Airport. You will wish to consider the potential impact of this development on the draft Plan, in the event that any NPS is designated and a new runway is taken forward

User:	London Borough of Hounslow
LB Hounslow supports this policy	

User:	London Borough of Southwark

The proposed refusal of all proposals for hydraulic fracturing is supported so that boroughs and the Mayor can meet greenhouse gas emission targets and to protect London’s scarce water supply.

User:	London Borough of Richmond Upon Thames
No comment	

User:	London Borough of Harrow
The Council supports this policy.	

User:	London Borough of Havering

Paragraphs 9.11.3 and 9.11.4

These statements could be strengthened to add weight to refusals for fracking on Green Belt land in Havering and other outer London areas – i.e. “applications would not be considered unless there is a case made for exceptional opportunity for both the borough and London as a whole to benefit long term.

User:	(FOE) Friends of the Earth England Wales and Northern Ireland

We strongly support this policy which sets out that Development proposals for exploration, appraisal or production of shale gas via hydraulic fracturing should be refused. This will be essential in order for London to become zero-carbon by 2050 and to avoid the harmful impacts on communities and the environment associated with this technology.

User:	Rebecca Rose

I believe that everyone in London has the right to breathe clean air, have access to nature and to benefit from clean energy. I am therefore pleased to see policies in the new London Plan which seek to address these important environmental issues. These include policies to protect our Greenbelt and Metropolitan Open Land, a ban on fracking, and a commitment to London becoming zero carbon.

User:	London Wildlife Trust
We welcome and support Policy SI11.	

User:	London Wildlife Trust
We recommend amending the criteria under para 9.11.4 – all SINCs, not just SMIs	

User:	Silvertown Homes

Policy SI11 states ‘development proposals for exploration, appraisal or production of shale gas via hydraulic fracturing should be refused’.

This statement is inconsistent with national planning policy. The policy should be deleted.

User:	The Forestry Commission

We welcome:

Links to GI and natural environment in Chapter 5 social infrastructure

User:	Barratt Developments plc

Policy SI11 states ‘development proposals for exploration, appraisal or production of shale gas via hydraulic fracturing should be refused’.

This statement is inconsistent with national planning policy. The policy should be deleted.

User:	London Borough of Sutton
SUPPORT. The London Borough of Sutton supports Policy SI11.	

User:	Landscape Institute London

Policy SI11 Hydraulic Fracking states that development proposals for fracking should be refused, noting the high probability that these would be in the Green Belt or MOL.

User:	Landscape Institute London

LI London has concerns about some development itemised in Clause 90 as ‘not inappropriate’ in particular ‘mineral extraction’ and ‘engineering operations’ However, LI London is pleased to note that Policy SI11 Hydraulic Fracking states that development proposals for fracking should be refused, noting the high probability that these would be in the Green Belt or MOL.

User:	Landscape Institute London

9.11.4 – LI London notes that this clause effectively states that a Landscape and Visual Impact Assessment (LVIA) or Townscape and Visual Impact Assessment (TVIA) would be required for as well as Traffic and other assessments, presumably as part of an Environment Statement (ES).

User:	London Borough of Ealing

Hydraulic Fracturing (Fracking)
(SI11)

The Council supports this new policy.

User:	CIBSE

CIBSE support Research & Development efforts and investment in reducing energy consumption in the first place, rather than investing in expensive and complex solutions such as fracking, particularly in the London area, which prolong the fossil fuel economy and carry substantial environmental risk including water consumption and pollution

User:	Hornsey & Wood Green Labour Party
Not allowing this in London is supported	

User:	Mr Sydney Charles
Not allowing this in London is supported	

User:	Redrow Homes London Division.

Policy SI11 states ‘development proposals for exploration, appraisal or production of shale gas via hydraulic fracturing should be refused’.

This statement is inconsistent with national planning policy. The policy should be deleted.

User:	Sean Creighton
CTUC/CA are opposed to fracking	

User:	Taylor Wimpey UK

Policy SI11 Hydraulic fracturing (Fracking)

We note that the Mayor does not support fracking in London.

Policy SI12 Flood risk management

User:	Aquality Trading and Consulting Ltd

SI5 and S12, SI13 Should be consider together. Water efficiency , Flood Risk Management and, sustainable drainage should be considered together not separately other wise it becomes difficult to achieve an Integrated Water Management Strategy. Could they not be put together as a single policy rather than three?

User:	London Borough of Hammersmith and Fulham

(Section A)

This section of the Policy requires that current and expected flood risk from all sources across London should be managed in a sustainable and cost effective way in collaboration with the Environment Agency, the Lead Local Flood Authorities, developers and infrastructure providers.

This is supported.

User:	London Borough of Hammersmith and Fulham

(Section B)

Section B requires that Development Plans should use the Mayor’s Regional Flood Risk Appraisal and their Strategic Flood Risk Assessment as well as Surface Water Management Plan, where necessary, to identify areas where particular flood risk issues exist and develop actions and policy approaches aimed at reducing these risks. Boroughs should co-operate and jointly address cross-boundary flood risk issues including with authorities outside London.

This approach is agreed.

User:	London Borough of Hammersmith and Fulham

(Section C)

Development proposals which require specific flood risk assessments should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses.

This approach is agreed and is in line with the Policies in the H&F Local Plan.

User: Mr David Harbott

Policy SI12 C only covers development proposals that need a specific flood risk assessment. The majority of small sites do not merit a specific flood risk assessment. However the CUMULATIVE impact of small site development has, based upon real experience, resulted in surface water flooding, waterlogging of neighbouring sites, and increased fluvial flood risk to local water courses.

New flood risk policies are required to cover the cumulative impact of the massive scale of small site development proposed in the New London Plan.

User:	Mrs Marilyn Mason

London should take the opportunity of flood risk to increase green spaces and trees that can absorb water.

User: London Borough of Hammersmith and Fulham

(Section D)

1. Development Plans and development proposals should contribute to the delivery of the measures set out in Thames Estuary 2100 Plan. The
2. Mayor will work with the Environment Agency and relevant local planning authorities, including authorities outside London, to safeguard an appropriate location for a new Thames Barrier.

This is supported.

User:	London Borough of Hammersmith and Fulham

(Section E)

Development proposals for utility services should be designed to remain operational under flood conditions and buildings should be designed for quick recovery following a flood.

This is agreed.

User: London Borough of Hammersmith and Fulham

(Section F)

Development proposals adjacent to flood defences will be required to protect the integrity of flood defences and allow access for future maintenance and upgrading. Where possible, development proposals should set permanent built development back from flood defences to allow for any foreseeable future upgrades.

This is agreed but there would appear to be a lot of overlap between Part F of the Policy and Part D on Thames Estuary 2100. This section could be removed or the 2 sections could be merged together.

User:	London Borough of Hammersmith and Fulham

In London, the boroughs are Lead Local Flood Authorities (LLFAs) and are responsible, in particular, for local surface water flood risk management and for maintaining a register of flood risk. They identify areas of flood risk to help inform appropriate locations for development. LLFAs should cooperate on strategic and cross-boundary issues.

Agreed

User: London Borough of Hammersmith and Fulham

The Regional Flood Risk Appraisal (RFRA) considers all sources of flood risk including tidal, fluvial, surface water, sewer, groundwater and reservoir flooding and has been updated in collaboration with the Environment Agency. The RFRA provides a spatial analysis of flood risk including consideration of risks at major growth locations such as Opportunity Areas and Town Centres and key infrastructure assets. The Government's updated allowances for climate change are reflected in the expected sea level rise and increased flood risks considered in the RFRA. The updated allowances consider the lifetime, vulnerability and location of a development.

If there is scope to update the RFRA, then this should be done to reflect the fact that Thames Water's plans regarding Counters Creek have changed since it was drafted.

Suggested change to text

The Regional Flood Risk Appraisal text needs amending to reflect the fact that Thames Water no longer plan to upgrade the sewer network in the Counters Creek catchment.

User:	London Borough of Hammersmith and Fulham

The Environment Agency’s Thames Estuary 2100 Plan (TE2100) focuses on tidal flood risk management. It requires the ability to maintain and raise some tidal walls and embankments. The Environment Agency estimates that a new Thames Barrier is likely to be required towards the end of the century. Potential sites will be needed in Kent and/or Essex requiring close partnership working with the relevant local authorities.

This is agreed and reflected in our own Local Plan

User:	London Borough of Hammersmith and Fulham

The concept of Lead Local Flood Authorities producing Riverside Strategies was introduced through the TE2100 Plan to improve flood risk management in the vicinity of the river, create better access to and along the riverside, and improve the riverside environment. The Mayor will support these strategies.

Noted and support from the Mayor welcomed.

User:	London Borough of Hammersmith and Fulham

The Environment Agency’s Thames River Basin District Flood Risk Management Plan is part of a collaborative and integrated approach to catchment planning for water. Making space for water when considering development proposals is particularly important where there is significant exposure to flood risk along tributaries and at the tidal-fluvial interface. The Flood Risk Management Plan should inform the boroughs’ Strategic Flood Risk Assessments.

Noted and agreed.

User: London Borough of Hammersmith and Fulham

In terms of mitigating residual risk, it is important that a strategy for safe evacuation and quick recovery to address such risks is in place; this is also the case for utility services. In the case of a severe flood, especially a tidal flood, many thousands of properties could be affected. This will make rescue and the provision of temporary accommodation challenging. Designing buildings such that people can remain within them and be safe and comfortable in the unlikely event of such a flood, will improve London's resilience to such an event.

Agreed and this is an approach H&F takes in ensuring mitigation of flood risks in new developments.

Suggested change to text

No changes required, although consideration could be given in this section to acknowledging that there are some types of developments that may be regarded as unsuitable in locations at the highest risks of flooding (e.g. self contained basements in the Rapid Inundation Zone where there may be no way to remain safe or evacuate in the event of a flood).

User: London Borough of Hammersmith and Fulham

Development adjacent to flood defences will be required to protect the integrity of existing flood defences. Wherever possible it should be set back from the banks of watercourses and flood defences to allow their management, maintenance and upgrading to be undertaken in a sustainable and cost-effective way.

This approach is in line with the requirements of the TE2100 Plan and is agreed.

Suggested change to text

No change required, although could consider moving this paragraph of text so it runs on from para 9.12.4 which is related?

User: Caterham Flood Action Plan

Dear Madam/Sir

We, the Caterham Flood Action Group (CFAG), representing flood victims of Old Coulsdon in the London Borough of Croydon (LBC), Chaldon and Caterham on the Hill (Surrey County Council (SCC) and Tandridge District Council (TDC)) would like to raise some concerns with regard to Si12 of the Draft London Plan.

We're aware of the desperate need for sustainable homes, but the National Planning Policy Framework is quite clear...

Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere.

We are concerned by the quantity of builds set for LBC ie 29,490 over 10 years, which DEFRA ranks as the 4th settlement in England most susceptible to surface water flooding.

The London Borough of Croydon's Local Plan is to be adopted any moment, we welcome the comments from the inspector...

FYI ...

169). In light of the convincing evidence of Croydon’s serious and extensive surface water flooding problems, I do not agree that the improvement over greenfield runoff rates sought by policy DM26.3(c) should be reduced to an aspiration. Nor, in this instance do I consider that the last two sentences of paragraph 8.24 should be elevated to policy. The penultimate sentence is no more than a statement of the obvious. The final sentence is simply pointing to policy in the London Plan rather than setting policy for Croydon. The Council’s suggested addition of an explanatory sentence to paragraph 8.26 adds further to the justification for policy DM26 and so contributes to its soundness. Policy DM26 applies equally to all forms of flooding and so an absence of a specific reference to sewer flooding does not make the plan unsound.

DM26 is on page 99 (or 134 of 358)

https://www.croydon.gov.uk/sites/default/files/articles/downloads/Croydon%20Local%20Plan%20Detailed%20Policies%20and%20Proposals%20-%20Proposed%20Submission.pdf

At the time of writing the LBC Local Plan, states 33,614 residential properties are at risk of surface water flooding in the Borough, we don't want to see that increase, for flooding destroys homes (Today the Environment Agency (EA) launched the Flood action campaign...

https://floodsdestroy.campaign.gov.uk/?utm_campaign=floodsdestroy17&utm_source=Article%20National&utm_medium=Refferal&utm_content=Article

Climate change will see that number increase without proactive action, Met Office research has found in England and Wales there is a one in three chance of a new monthly rainfall record in at least one region each winter.

Properties built after 2009 are not eligible to apply for Flood RE (affordable insurance) because the Gov expect us not to be building on flood risk areas, they also expect the UK to be flood resilient by 2039, when the scheme runs out, so we have to start planning not to flood now!

The LBC are the Local Lead Flood Authority (LLFA), they must by law manage the flood risk, yet LBC also own the private development company Brick by Brick (we have slight concerns over conflict of interest), consequently they'll be very happy with a hefty housing quota BUT drainage infrastructure is inadequate to cope as it stands today without additional thousands !!

The National Planning Practice Guidance states, "Adequate water and wastewater infrastructure is needed to support sustainable development".

Utility companies (Thames water (TW) in this area) are obliged to make connections regardless of the consequences downstream, thus homes become filled with effluent in the event of a storm, we would like to see utility companies become statutory consultees to ALL planning applications in a flood risk area (as defined by the LLFA) to protect homeowners from sewage flooding.

The quantity of new builds set must therefore, be reconsidered / reduced, taking the very real flood risk into account.

Many homes were flooded in June 2016 and not for the first time, for some this is the fourth time in twenty years ie a 1:5 flood risk! I personally am terrified of development... And rain from the surrounding area but also from SCC/TDC.

https://www.surreycc.gov.uk/__data/assets/pdf_file/0007/106198/Section19_CaterhamFlood_7June2016.pdf

https://www.croydon.gov.uk/sites/default/files/articles/downloads/Caterham%20Drive%20S19%20Report%20Final.pdf

SCC as LLFA stated in a public meeting on 13th July 2016 that they had not met their statutory duty, the LGO has upheld a complaint against LBC, 'failure to manage flood risk'. The CFAG was formed with the help of the National Flood Forum (NFF), thankfully (and eventually, having all complained and campaigned as individuals, for almost two decades), we hold regular multi-agency meetings in the hope of finding a long term solution YET we're still at risk and development continues in a surface water flood risk area putting additional strain on the above mentioned failing infrastructure, the 'guidelines' in place must be adhered to and written into ALL Local Plans.

We note the need for cooperation cross-boundary and are grateful discussions have begun between LBC, SCC, TDC, EA and TW, BUT we've had to fight for that, it was not automatic. What measures are in place to guarantee that councils on the edge of the London Basin are considering the quality and capacity of the infrastructure 'downstream', flood risk should not be discharged from one area and permitted to flow into London. We must therefore, ensure ALL counties surrounding London are aware of their responsibility as riparian owners and that their local plans reflect this.

Kind regards

Julie Blackburn

(For and on behalf of the Caterham Flood Action Plan)

User:	The Access Association

Policy SI12 Flood risk management

No mention of ensuring accessibility even where flood is a risk, which is disappointing

User:	Mr Chris Gannaway
Strongly support this policy	

User:	London Forum of Amenity and Civic Societies

London Forum supports this policy.

User: London Borough of Croydon - Highways

Under SI12 Part B, as well as the mentioned plans, we would propose that Development Plans should also use flood investigation reports prepared under Section 19 of the Flood and Water Management Act to identify areas with particular known flood issues.

Paragraph 9.12.1 contains the wording '*LLFAs….. are responsible, in particular, for….. maintaining a register of flood risk*'. We consider this wording is ambiguous and could be made clearer with regards to the responsibility of the LLFA as defined under the FWMA 2010. Under the FWMA 2010, LLFAs are responsible for maintaining a register of *'structures or features which in the opinion of the authority, are likely to have a significant effect on flood risk in its area'*. Further, as the LLFA, we maintain our own records of flooding and continue to develop an overview of local flood risks.

User:	Mr Geoffrey Lean

Flooding is an enormously serious issue, and these policies do not go far enough. There should be a presumtion against building on flood prone land, as the NPPF lays down, and its Sequential test should be structly applied. Mitigation will not be sufficient.

User:	Butterfly Conservation

we note that green infrastructure contributes benefits to air quality (Policy SI1) and to sustainable drainage and flood mitigation (Policies SI12, SI13).

User:	City of London Corporation

Paragraph 9.12.4 should be amended to make it clear that Lead Local Flood Authorities have a duty to prepare Local Flood Risk Management Strategies which in most cases will encompass any requirement to address flood risk management in the vicinity of the River Thames thereby negating the need for separate flood related Riverside Strategies.

User: Thames Water

We support the policy in principle. In particular we support the recognition at part E that utility services, which would include water and wastewater infrastructure, may be necessary in flood risk areas.

When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk policies should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.

The National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas to be at risk from forms of flooding other than from river and sea which includes "Flooding from Sewers" and this should be referenced in the policy and/or supporting text.

Part A of Policy SI12 sets out that current and expected flood risk from all sources across London should be managed. The National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas to be at risk from forms of flooding other than from river and sea which includes "Flooding from Sewers".

Flood risk policies and supporting text should therefore reference to ‘sewer flooding’ and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure is not in place ahead of development.

We would welcome a discussion with the GLA regarding how open spaces, including roads, could be designed to retain, delay or direct stormwater flows when usual flood risk management infrastructure is overcome

User: UK Rainwater Management Association (UKRMA)

1. This policy could be considered to take an overly narrow view of flood risk management, largely constrained by the political boundary of the GLA; the causes of floods in London will, of course, be partly defined by natural water-flows beyond political boundaries, which the Plan could briefly acknowledge.

1. **Recommendation:** It is recommended that this policy be introduced with narrative that acknowledges that the FRM of the Plan area sits within the context of the broader FRM of the Thames river basin and, in particular, any attenuated offline storage developed along catchment areas to meet agricultural requirements given predicted future drought risks.

User:	London Borough of Haringey
The Council supports this policy.	

User:	London Borough of Lewisham

SI12 should provide stronger guidance on the adoption of a regional approach to the inclusions of climate change projections within planning, as flooding was identified as a key risk within the UK Climate Change Risk Assessment 2017. The use of consistent Representative Concentration Pathway (RCP) scenarios within flood risk management assessments will assist developers and will help to identify adequate management strategies.

User:	London Borough of Brent
The Council supports this policy.	

User: Environment Agency

We strongly support the policy, subject to amendments. We welcome the explanatory text (page 360 on), at the following paragraphs:

- Para.9.12.1 – supporting cross-boundary co-operation between Lead Local Flood Authorities.
- Para.9.12.2 - our Thames Estuary 2100 Plan which will help London adopt an ‘adaptive pathways’ approach to managing future tidal flood risk;
- Para 9.12.3 - a new Thames Barrier;
- Para 9.12.4 - a ’Riverside Strategies’ (para 9.12.3) to coordinate improvements to flood risk management in the vicinity of the river;
- Para.9.12.5 - the Thames River Basin Management Plan’s Flood Risk Management Plan, as part of a collaborative and integrated approach to catchment planning.
- Para 9.12.6 – making buildings (and utilities) resilient to the consequences of flooding
- Para.9.12.7 – support for setting buildings back from flood defences to ensure future management and upgrading is cost-effective and sustainable.

We have advised on the development of the draft Regional Flood Risk Assessment (RFRA 2017), and are largely supportive of this. However, we consider that the draft RFRA can be improved, and refer you to our separately appended comments. These comments notwithstanding, the draft RFRA needs to more clearly set out the rationale used in the application of the Sequential Test to assessing flood risk (National Planning Policy Framework, paragraphs 100-104).

Section 1.3 of the draft RFRA addresses the application of the Sequential Test. Paragraph 18 of that section highlights that the strategic approach followed was to reduce, by a varying percentage, via the Strategic Housing Land Availability Assessment (SHLAA) process, the potential housing capacity of sites dependent upon an evaluation of the level of flood risk. Paragraph 19 says that in major growth locations and town centres, the expectation is that boroughs will need to apply the Sequential Test in more detail when allocating uses.

In our view, the rationale used in applying the Opportunity Area-specific % reductions used should be clearly set out. Further, we recommend adding text to the RFRA's subsequent text on the Opportunity Areas, to demonstrate how the Sequential Test has been applied within the growth areas, including any information provided by the Local Authorities following their consultation. Currently there is an element of uncertainty in the evidence on flood risk, particularly in the Opportunity Areas, where housing numbers are set by the Plan. If subsequent application of the Sequential Test by boroughs shows that the new homes targets in the Plan cannot be accommodated within areas at lowest flood risk, then consideration would need to be given to accommodating development in areas of higher flood risk. If assessment shows that the development cannot be safely accommodated, some boroughs may fail to accommodate their housing targets. We are happy to advise further on the draft RFRA as it evolves, and in the meanwhile our appended detailed advice on the RFRA refers.

Note that the Environment Agency would object to the approval of planning permission should proposed development restrict the future upgrading of flood defences.

It is important to design out flood risk from the earliest stages of development design. Consequently we recommend that an additional point is added to explanatory text, which is similar to that included at paragraph 3.10.3 related to crime.

Recommendation:

- Strengthen policy Point F. The policy wording, 'Where possible…' places insufficient imperative for development proposals to be set back from flood defences. We recommend alternative wording to read, **'Unless exceptional circumstances are demonstrated for not doing so, development proposals should be set back from flood defences to allow for foreseeable future maintenance and upgrades, and employing natural flood management methods to increase flood storage, and to create recreational areas and habitat.'**
- Add a new paragraph to explanatory text to read: '**Measures to address flood risk, should be integral to development proposals and considered early in the design process. This will ensure they provide adequate protection, do not compromise good design, do not shift vulnerabilities elsewhere, and are cost-effective.'**
- Review the explanation of the application of the flood risk sequential approach, and consider our appended detailed advice on the RFRA. Work to develop the RFRA is recommended.

User: Environment Agency

Reference is made to the ‘Environment Agency’s’ Thames Estuary 2100 Plan, which we consider is inaccurate. The TE2100 Plan is not owned by us but is a partnership plan, and we would like to reinforce the imperative for partnership action in its delivery. Please refer to our detailed advice on the RFRA in regards to this.

Amend, for consistency with our comment above on Policy SI12, point F, to reinforce that development should be set back from the river

Recommendations:

- Para 9.12.3. Suggested re-wording, to read ‘The Thames Estuary 2100 Plan (TE2100), **published by the Environment Agency, and endorsed by government**, focuses on a **partnership approach** to tidal flood risk management.’
- We recommend adding the text in bold, ‘It requires the ability to maintain and raise some tidal walls and embankments. **From the earliest stages in the design process, development should be planned to be set back from flood defences.**’ etc.

User:	London Borough of Tower Hamlets
This is largely positive and recognises the importance of defence raising/land setback for tidal flood risk management (TE2100).	

User: Environment Agency

We recommend clarifying the policy expectations of ‘Riverside Strategies’ as distinct to the Joint Thames Strategies as required under policy SI14 B. There may be overlap.

Recommendation:

Clarify the role and expectations of ‘Riverside Strategies’ as distinct to the ‘Joint Thames Strategies’

User:	Royal Borough of Kingston
Support.	

User: London Borough of Hillingdon

The policy should cover the need for an upper catchment approach in areas not at risk, providing more benefit than focusing on just the receptors. The Regional Flood Risk Assessment supports and refers to this method.

There is no reference to the need for natural flood risk management and small scale interventions linked with Green Infrastructure, which will slow the flow to the major tributaries. In addition, the standards for managing flood risk where the receptor is more vulnerable should be higher.

Criterion C should reflect that there is still a hierarchy in approaches to mitigating residual risk. It could define and encourage that resistance is preferable, and those defenses which do not require human intervention, such as flood doors rather than barriers, and only then to any resilience methods i.e. recovery after the site is flooded.

Whilst the proposed Riverside Strategies referred to in paragraph 9.12.4 are broadly supported, the approach is too focused on those areas in the centre of London along the River Thames corridor. It is critical that the upper Thames catchment areas contribute to reducing flood risk to the lower catchment by "slowing the flow" of water, through natural flood management and addressing a number of the Water Framework Directive recommendations and the Thames River Basin Management Plan. These principles should be a critical element within this policy and linked with the provision of green infrastructure.

Paragraph 9.12.2 does not refer to the assessment of flood risk issues associated with policy H2. In addition, the RFRA does not assess the impact that small site development may have on the flood risk or other environmental factors, as they are not subject to such significant constraints. The RFRA should recommend appropriate constraints within those focus areas to mitigate any potential impact.

The Impact Assessment for Policy H2 does not recognise that there is an impact in flood risk terms and marks it as not applicable. However if a significant driver within the London Plan is to secure long term sustainable and appropriately designed housing, which encourages future green infrastructure to mitigate impacts. Encouraging smaller sites will not achieve this as these are below thresholds for current constraints on development to be considered.

User:	London Borough of Merton

Support with amendments General comment (A-F and para’s 9.12.1 -): The Flood Risk Management policy, while generally supported, should try and address the existing imbalance that exists within the NPPF across the various sources of flood risk. In particular, due to the significant risk of surface water flooding across London, the level of detail that specific applications may need to submit in terms of Flood Risk Assessment should be equal across surface water, groundwater and sewer flooding, not only fluvial/tidal risk, which if often seen as more critical because of Flood Zone mapping.

User:	London Borough of Merton

Higher standards of protection should be considered for essential infrastructure including utility services, compared to other development classes, such as more vulnerable development.

User:	London Borough of Merton

This paragraph underplays the role of LLFAs. The role of LLFAs as a statutory consultee for surface water matters is not mentioned, as well as the promotion of SuDS and implementation of SuDS schemes in the public realm across London.

User:	London Borough of Merton

The general comment made above regarding all sources of flood risk is a matter that should also be picked up in the regional flood risk appraisal. Climate change allowances should have reference not only to sea level rise but also rainfall intensity and river flows.

User:	London Borough of Hounslow
LB Hounslow supports this policy	

User:	London Borough of Southwark

The council supports the implementation of the Thames Estuary 2100 recommendations, which has been addressed in the New Southwark Plan.

User:	London Borough of Wandsworth

The Council supports the principles of the policy which are in line with the Councils own Flood risk Policies. However funding would be welcome to update surface water management plans in collaboration with neighbouring boroughs.

User:	London Borough of Richmond Upon Thames

The Council supports the principles of the policy and the Drainage Hierarchy which are broadly in line with the Council’s own Flood Risk and Sustainable Drainage Policy, LP21. However funding would be welcome to update surface water management plans in collaboration with neighbouring boroughs.

User:	London Borough of Harrow
The Council supports this policy.	

User:	Royal Borough of Greenwich

SI12A

Thames Water and TfL should be included in the list of agencies to collaborate with. Thames Water and TfL are defined in the Flood and Water Management Act as Risk Management Authorities. These have a different legal status to ‘infrastructure providers’.

User:	Royal Borough of Greenwich

The role of LLFAs is incorrectly described in this paragraph. LLFAs are required to hold a register of flood risk assets. This is different from a register of flood risk. The LLFA does not identify areas of flood risk to help inform appropriate locations for development. This function is carried out through the SFRA. The LLFA has the Local Flood Risk Management Strategy (LFRMS) which identifies all known flood risk in the borough, but that document does not inform development.

User:	Royal Borough of Greenwich

Clarification needed. As worded, the paragraph could be read as suggesting a change in approach from current practices which is to ensure that evacuation plans are in place and moving people to upper floors is a last resort. Whereas it is assumed that the intent is to clarify that evacuation plans alone are insufficient to ensure resilience.

User:	Royal Borough of Greenwich

A minimum distance (or, if this is not practicable, an indicative distance) for the required set back to accommodate flood defences should be provided for clarity.

User:	The Wimbledon Society

G9A (& Si12): There should be specific Proposals and funding to clean up the dreadful standards of local rivers (eg Hogsmill River, Beverley Brook, River Wandle) and bring them back to nature and public access

User:	London Borough of Enfield

Policy SI12 ‘Flood risk management’ does not provide detail on how much a development should be set back from the edge of a watercourse. There needs to be commitment from the mayor to update the Regional Flood Risk Appraisal following any major flood events in London. There also needs to be more regarding the relationship between local authority Strategic Flood Risk Assessments and the Mayor’s Regional Flood Risk Appraisal.

User: Just Space

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

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

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

What Needs to be Done:

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

— Sustainable urban drainage systems

— Stopping the leaks

— Increase in river and canal transport for passengers and freight, including waste and construction materials

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

Incremental, low impact small scale interventions should be promoted.

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

Making London a Blue Green City

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

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

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

Sustainable Urban Drainage System (SuDS)

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

What Needs to be Done:

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

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

User:	London Borough of Bexley

Part B of **Policy SI12 Flood risk management** notes that boroughs should use their Surface Water Management Plan in the preparation of development plans. However, SWMPs are not legal documents. The policy should reference instead Local Flood Risk Management Strategies, as these are a legal requirement and identify risk across the area. **Part C** of **Policy SI12** should not just relate to development where '*specific flood risk assessments are required,'* but to all developments, as it is this that provides opportunities to reduce flood risk to the area.

User:	Federation of Small Businesses

If a business is affected by a flood it can take over 12 months for them to become fully operational again. As well as the direct flood damage, disruption to staff and customers, supply chains, utilities and transport are the most frequently occurring problems for small businesses during severe weather events.

It is vital that infrastructure is built to withstand the pressures a flooding event can create.

The risk will never be zero, so small businesses need to be empowered to improve their own resilience through a combination of trusted property-level protection and adequate insurance.

User: Thames Regional Flood and Coastal Committee

We strongly support the policy, subject to amendments. We welcome the explanatory text (page 360), at the following paragraphs:

? Para.9.12.1 – supporting cross-boundary co-operation between Lead Local Flood Authorities.

? Para.9.12.2 –the Thames Estuary 2100 Plan which will help London adopt an ‘adaptive pathways’ approach to managing future tidal flood risk;

? Para 9.12.3 - a new Thames Barrier;

? Para 9.12.4 - ’Riverside Strategies’ (para 9.12.3) to coordinate improvements to flood risk management in the vicinity of the river;

? Para.9.12.5 - the Thames river basin district Flood Risk Management Plan, as part of a collaborative and integrated approach to catchment planning.

? Para 9.12.6 – making buildings (and utilities) resilient to the consequences of flooding

? Para.9.12.7 – support for setting buildings back from flood defences to ensure future management and upgrading is cost-effective and sustainable.

We have read the draft Regional Flood Risk Appraisal (RFRA 2017), and are largely supportive of this. However, we consider that the draft RFRA can be improved, and refer you to our appended key messages on the RFRA specifically. These comments notwithstanding, the draft RFRA needs to more clearly set out the rationale used in the application of the Sequential Test to assessing flood risk (*National Planning Policy Framework, paragraphs 100-104). Section 1.3 of the draft RFRA addresses the application of the Sequential Test. Paragraph 18 of that section highlights that the strategic approach followed was to reduce, by a varying percentage, via the Strategic Housing Land Availability Assessment (SHLAA) process, the potential housing capacity of sites dependent upon an evaluation of the level of flood risk. Paragraph 19 says that in major growth locations and town centres, the expectation is that boroughs will need to apply the Sequential Test in more detail when allocating uses.*

In our view, the rationale used in applying the Opportunity Areaspecific % reductions used should be clearly set out. Further, we recommend adding text to the FRA's subsequent text on the Opportunity Areas, to demonstrate how the Sequential Test has been applied within the growth areas, including any information provided by the Local Authorities following their consultation. Currently there is an element of uncertainty in the evidence on flood risk, particularly in the Opportunity Areas, where housing numbers are set by the Plan. If subsequent application of the Sequential Test by boroughs shows that the new homes targets in the Plan cannot be accommodated within areas at lowest flood risk, then consideration would need to be given to accommodating development in areas of higher flood risk. If assessment shows that the development cannot be safely accommodated, some boroughs may fail to accommodate their housing targets.

Note that the Environment Agency would object to the approval of planning permission should proposed development restrict the future upgrading of flood defences.

It is important to design out flood risk from the earliest stages of development design. Consequently we recommend that an additional point is added to explanatory text, which is similar to that included at paragraph 3.10.3 related to crime.

Whilst we appreciate the focus of the Plan must be London, it is disappointing that there is no recognition that flooding issues in London are influenced by influenced by rain falling outside London. This rain drains into a network of local rivers, continues flowing through the Thames catchment towards London. There is a substantial risk of flooding as this water converges in London. We would like to see the Mayor supporting the London Boroughs, Environment Agency and infrastructure suppliers to adopt an integrated catchment approach to flood risk management. This involves working cooperatively with partners outside the London boundary to ensure a coordinated and mutually beneficial approach to future flood-related investment decisions. To help support this collaborative working we see the need to produce a Statement of Common Ground on agreed (and disputed) issues. This can further encourage uncooperative authorities to co-operate and promote collaboration and cross boundary working to fund key pieces of flood defence infrastructure.

Reference is made to the *'Environment Agency's'* Thames Estuary 2100 Plan, which we consider is inaccurate. The TE2100 Plan is not owned by the Environment Agency, but is a partnership plan.

We recommend clarifying the policy expectations of 'Riverside Strategies' as distinct to the Joint Thames Strategies as required under policy SI14 B. There may be overlap.

Amend, for consistency with our comment above on Policy SI12, point F.

Thames RFCC Response:

Recommendations

Our recommendations for changes to the Plan

SI12:

? Point A should include the Thames Regional Flood and Coastal Committee (RFCC) as well as the Environment Agency and Lead Local Flood Authorities. Thames RFCC has a key role in deciding on flood defence spending priorities, and there is a now a strong working relationship with London authorities which it is important to recognise and continue.

? Point A should specifically refer to Thames Water or at least water and sewerage companies.

? Strengthen policy Point F. The policy wording, 'Where possible…' places insufficient imperative for development proposals to be set back from flood defences. We recommend alternative wording to read, ***'Unless exceptional circumstances are demonstrated for not doing so, development proposals should be set back from flood defences to allow for foreseeable future maintenance and upgrades, and employing natural flood management methods to increase flood storage, and to create recreational areas and habitat.'***

? Add a new paragraph to explanatory text to read***: 'Measures to address flood risk, should be integral to development proposals and considered early in the design process. This will ensure they provide adequate protection, do not compromise good design, do not shift vulnerabilities elsewhere, and are cost-effective.'***

? Review the explanation of the application of the flood risk sequential approach, and consider our appended key messages on the RFRA. Work to develop the RFRA is recommended.

Suggested re-wording, to read *'**The** Thames Estuary 2100 Plan (TE2100), **published by the Environment Agency, and endorsed by government, focuses on a partnership approach to** tidal flood risk management.'*

We recommend that this be re-worded, removing *'Wherever possible'*, and adding. ***'From the earliest stages in the design process, development should be set back…'***

User: British Property Federation

We are pleased that the Mayor is seeking to manage flood risks from all sources and are pleased that greater engagement between the Environment Agency, the Lead Local Flood Authorities, local planning authorities, developers and infrastructure providers is being encouraged. The Mayor's commitment to flood risk management is underlined by his plan to undergo perpetual maintenance to ensure robust defense against flood threats and we are encouraged by this.

However, to ensure that flood risk management is as effective as it could be, Government should review the effectiveness of their coordination, resourcing and administration process in high-risk flooding areas. Possible ideas for managing flood risk in London include, the use of natural flooding deterrents, such as planting, in areas with the natural landscape to do this, improved on site attenuation where appropriate and encouraging more rainwater harvesting for flushing and irrigation. We would also ask that government provide those who work in the flood management sector with the platform to be a leading asset in flood management and ensure that they have incessant access to new research.

A key aspect of London's flood defense is the Thames Barrier and it is important a new Barrier is pursued with sufficient urgency, making contingency for land use that will service the barrier and working with the Environment Agency on funding.

User: Town and Country Planning Association

Policy SI12 Flood risk management

3.7.4 The TCPA supports this policy and believes that SI12 (B) or in the supporting text, further guidance could be set out to encourage Boroughs to develop a process or framework. This could include developing a Local Adaptation Strategy Plan (LASP) which would allow for a multi-agency and collaborative approach to building resilience and adaptation action. Working within European projects and the good practice they have identified, the TCPA would recommend its guidance developed as part of the GRaBS and EPICURO projects on adaptation action planning.

3.7.5 In summary the TCPA supports Policy SI12 with a recommendation to strengthen the supporting text for SI12 (B) with further guidance as outlined.

User:	Surrey County Council

We welcome the statement in Policy SI12 that London boroughs should co-operate and jointly address cross-boundary flood risk issues with authorities outside London as well as within London.

User:	London Wildlife Trust

We welcome and support Policy SI12.

[Seek opportunity for natural flood management and structures that support multiple ecosystem services]

User: Natalya Palit

In policy SI12C the Mayor should give consideration to strengthening the requirement to set back development from the edge of watercourses, particularly in opportunity areas or regeneration areas where there is potential for wider scale public routes to be created along water frontages. An alternative suggested wording could be: “This should include, where possible, making space for water, ~~and aiming for~~ the starting point for scheme design in such locations where there is potential for wider public access to be created along the water frontages should be for development to be set back from the banks of watercourses”

Detailed modelling of surface water run-off at borough-level is often only publically accessible in the form of static pdf maps. Given the strategic importance of improving the water environment and reducing contribution to flood risk, the Mayor should give consideration to encouraging Boroughs and LLFAs to contribute to a centralised London-wide database to make information more easily accessible in line with the Mayors commitment to open data.

User: London Borough of Sutton

SUPPORT WITH CONDITIONS. The London Borough of Sutton supports the overall aims of Policy SI12. However the policy should make a clearer distinction between the respective approaches which need to be followed by developers in managing surface water and fluvial flood risks. To avoid confusion, these issues should ideally be dealt with in different policies.

Policy 5.12 of the current London Plan 2016 on ‘Flood Risk Management’ is particularly helpful in this regard since it is separated out from Policy 5.13 on ‘Sustainable Drainage’ and deals primarily with managing fluvial flood risks in EA flood zones adjacent to watercourses, the sequential and exceptions tests, designing for flood resilience and resistance and emergency planning etc . While Policy 5.12 makes clear that development proposals “must comply with the flood risk assessment and management requirements set out in the NPPF and the associated technical guidance on flood risk and have regard to measures proposed in “Catchment Flood Management Plan”, this degree of clarity is lacking in Policy SI12.

Cross-references should be provided as appropriate to key nationally adopted guidelines such as Environment Agency’s (EA) standing advice on preparing flood risk assessments (see https://www.gov.uk/guidance/flood-risk-assessment-standing-advice) and Government guidance on flood resilient construction. The role of the EA as a statutory consultee for planning applications located within fluvial flood risk areas (Flood Zones 2 and 3a) is also not made clear in the supporting text.

User: London Borough of Newham

Policy SI12 Flood Risk Management

LBN in general support this policy, given that it is complementary to policies to manage flood risk in Newham. However, it is submitted that the paragraph 9.12.4 incorrectly states that the LLFAs are responsible for Riverside Strategies, rather it is a responsibility of the Local Authority to translate the concept into Local Plans and other strategies.

It is also observed that the EA frequently comments that Local Plans should be demanding more funding from developers for long-term (TE2100) flood defence upgrades. While the role and responsibility of riparian owners is understood, the fluvial and tidal flood risk in London are huge strategic issues, such that neither individual developers, nor individual Local Authorities should be responsible for funding and co-ordinating the necessary response to these risks in an uncoordinated way. It would therefore add useful strategic value to planning for development and community safety of the GLA were to work more closely with the EA to address these threats and coordinate the London-wide.

User: Natural England

Natural England has a key role to play in landscape scale flood-risk management, and would be suitably placed to provide advice on integrating management with the objective of conserving and enhancing biodiversity. As such Natural England would be eager to collaborate with the named bodies in A on landscape scale flood-risk management issues.

Recommendation:
The text in A is amended to read: '*Current and expected flood risk from all sources across London should be managed in a sustainable and cost effective way in collaboration with the Environment Agency, **Natural England**, the Lead Local Flood Authorities, developers and infrastructure providers'.*

Flooding is a clear risk for residents living within flood zones, however where appropriate natural flood management techniques should be used to maintain and enhance the integrity of natural hydrological systems, recognising that in certain environments flooding is a natural process which maintains ecological integrity. Natural flood risk management methods can contribute significantly to improving flood resilience whilst also enhancing the coherence of the natural water cycle within London. Therefore we **recommend**, as per the Environment Agency's response, that this policy includes a measure to encourage development proposals to integrate natural flood management features which create recreational areas and habitats.

User: CIBSE

We support the overall objectives but would welcome the introduction of clearer and more specific criteria.

We would also recommend the use of a holistic approach with recognition of the potential contribution by green infrastructure – see response to Chapter 8.

User:	Hornsey & Wood Green Labour Party

We support these policies, particularly the B 2) green roofs and C re impermeable paving on front gardens and driveways.

User: Ickenham Residents' Association

The proposals to allow new homes to be built within the curtilage of an existing house (garden grabbing) is strongly opposed. Most of the suburban village of Ickenham is located within 800 of a station and as such, would fall foul of policy H2(D). The intense densification that this policy provides for would fundamentally change the established character of the historic village of Ickenham and would also no doubt make our local flooding issues worse. We are a garden friendly village and the prospect of essentially issuing a licence to build on all the back gardens in Ickenham east of the river Pinn is strongly opposed. Policy H2(D) is also clearly in conflict with national policy on garden grabbing and in conflict with the Mayor's aims of a greener city. It should be deleted.

User:	Mr Sydney Charles
We support these policies, particularly the B 2) green roofs and C re impermeable paving on front gardens and driveways.	

User:	Freehold Community Association

Policy SI12 - Flood Risk Management
This policy is weak and is not consistant with the Environmental Strategy.

User:	Freehold Community Association

Also the policy does not contribute to achieving sustainable development.

User: Freehold Community Association

The Policy should be amended as shown below:-

EXISTING B.
Development Plans should use the Mayor's Regional Flood Risk Appraisal and their Strategic Flood Risk Assessment as well as Surface Water Management Plan, where necessary, to identify areas where particular flood risk issues exist and develop actions and policy approaches aimed at reducing these risks. Boroughs should co-operate and jointly address cross-boundary flood risk issues including with authorities outside London.

NEW B.
Development Plans should use the Mayor's Regional Flood Risk Appraisal and their Strategic Flood Risk Assessment as well as Surface Water Management Plan to **examine and** identify **locations and** areas **with** flood risk issues **and to safeguard land for flood risk management, including green spaces and infrastructure.**

Development proposals, should contribute to reduce the causes and impacts of flooding and flood risk in the area and beyond. This can be achieved through the layout and form of development, and where appropriate, through designing off site works required to protect and support development in ways that benefit the area more generally.

Boroughs should co-operate and jointly address cross-boundary flood risk issues including with authorities outside London.

Authority for change :

The NPPF taken as a whole on strategic flood risk but in particular paras 99 to 104, 154 and 162

NPPG ID7-050-20140306,

MENSTON ACTION GROUP v CITY OF BRADFORD METROPOLITAN DISTRICT COUNCIL [2016] EWHC 127 (QB

User: UK Power Networks

Flood Resilience

We have sought to deliver flood protection measures in London that are cost efficient and deliver the maximum risk reduction to improve the number of customers protected. Resilience in the supply network ensures that customers supply can often be quickly re-established at minimal inconvenience following flooding of critical equipment. Flood mitigation of vulnerable sites are prioritised where there are high numbers of 'unrecoverable[24]' customers connected to a vulnerable site.

Since 2011 in excess of twenty vulnerable substations have been protected from flooding in London with a similar number in the pipeline for protection during the remainder of the RIIO-ED1 period. This amounts to nearly half a million additional customer supplies protected. Flood events such as the incidents in Tooley Street, London (April 2008 and May 2009) have highlighted the risk that substations (particularly subterranean sites) are subject to surface water flooding. As a result, our London flood programme has focused primarily on surface water flood protection at sites with plant and equipment below ground level. Following site-specific assessments, at risk sites have had flood protection measures in the form of bunding, floodgates and sealing of duct and cable entries implemented during the past few years to mitigate this risk.

Where substation sites are developed and new buildings and plant are installed, guidance documents are available to assist engineers and third parties in identifying flood risk and protecting new plant and equipment. This will normally be achieved by raising the critical equipment above the environment agency 1:100 or 1:1,000-year flood levels.

[24] Many substations have high levels of interconnection, meaning load can be transferred from site to site to manage demand. 'Unrecoverable' customers are defined as those customers who cannot have their supply switched to an alternative substation (i.e. one not affected by a flooding event) due to limited interconnection at the flooded site

User:	Taylor Wimpey UK

Policy SI12 Flood risk management

We are supportive of a high level of flood protection for London.

User:	Cirrus Land and The Guinness Partnership

Flood Risk

Although water is a dominant visual feature in this locality [Yiewsley Waterside], much of the site is within an area at low risk from flooding (i.e. Flood Zone 1 and ‘Areas Benefitting from Flood Defences’). Such areas have a less than 1 in 1,000-year annual probability of flooding from rivers. This is largely because the site levels following the completion of the landfill operations are well above the levels of the watercourses. The remediation strategy for the site would minimise the removal of materials and create finished development platforms which meet requirements for flood protection.

Around the periphery of the site there are localised areas with a higher risk of flooding (i.e. Flood Zone 3). The detailed masterplanning process will minimise the potential for significant impact within such areas, including proposals for the storage of water and flood protection. Detailed designs will also incorporate Sustainable Drainage Systems (SuDS) to promote natural drainage processes, reduce flood risk both on site and in the neighbouring areas, reduce pollution and provide landscape and wildlife benefits.

User:	Environment Agency
Flood management – the draft Regional Flood Risk Assessment requires development. Our separate detailed appendices advising on the RFRA also refers.	

User:	British Water

1. The Water infrastructure (SI5), Flood Risk Management (SI12) or Sustainable Drainage (SI13) talk about ongoing monitoring and flood risk alarms for site infrastructure to increase risk awareness and potential ongoing maintenance requirements. The recoomendation is that each new network have a monitoring system to report on system performance. Therefore, by continually managing the new top of the catchment networks better this should improve the performance of the downstream sections of the network too, which are typically the most stressed sections.

User: Thames Regional Flood and Coastal Committee

We particularly welcome your support for the Thames Estuary 2100 plan (TE2100), which sets out how tidal flood risk will be managed in the Thames Estuary to the end of the century. It is a leading example of embedding climate change adaptation into the heart of major projects and plans. We also welcome your recognition of the importance to London of co-operation on the issue of safeguarding sites for a potential new Thames Barrier.

The strengthening of the sustainable drainage policy is welcome. There are more properties and infrastructure at risk of surface water flooding in London than any other source and so it is imperative that new development is achieving greenfield run-off rates, in a sustainable manner. Although new development will play a large role in reducing surface water run-off in London, the plan should be strengthened to encourage retrofitting of sustainable drainage systems.

We also have concerns that the flood risk implications of the small sites policy have not been fully assessed. Sites of this size are not sequentially tested in terms of flood risk and would have to be dealt with as part of the windfall sites process, which does not allow the Local Planning Authority to plan for an appropriate level of mitigation. Proposals for sites which are not classed as major development are not required to provide sustainable drainage information as part of their applications. In addition, sites under 1 hectare do not require Flood Risk Assessments and proposals for the extension or conversion of existing properties have limited requirements. Given these limited requirements and the scale of development expected to come forward from small sites, the cumulative impact of the proposed approach has the potential to significantly increase flood risk. In addition, the policy does not comply with the requirements of policy SI12 to manage current and expected flood risk in cost effective way and well as supply appropriate infrastructure and mitigation.

Whilst we appreciate the focus of the Plan must be London, it is disappointing that there is no recognition that flooding issues in London are influenced by rain falling outside London. This rain drains into a network of local rivers, continues flowing through the Thames catchment towards London. There is a substantial risk of flooding as this water converges in London. We would like to see the Mayor supporting the London Boroughs, Environment Agency and infrastructure suppliers to adopt an integrated catchment approach to flood risk management. This involves working cooperatively with partners outside the London boundary to ensure a coordinated and mutually beneficial approach to future flood-related investment decisions. To help support this collaborative working we see the need to produce a Statement of Common Ground on agreed (and disputed) issues. This can further encourage uncooperative authorities to co-operate and promote collaboration and cross boundary working to fund key pieces of flood defence infrastructure.

We consider there is a need to further develop the Regional Flood Risk Appraisal (RFRA) to evidence the Plan, and the Environment Agency should continue to support that with data and advice. Notably, there is a need to develop the application of the Sequential Test for the designated growth areas, given the Plan's reliance on delivering ambitious housing targets in these locations. We would also like to see a more detailed assessment of the impacts of climate change in the RFRA. Please refer to our appended detailed comments on the RFRA

We support your policy confirming Green Belt status should be protected. This is because we share your desire to maintain green infrastructure and improve quality of life, but also because the green belt can help make space for water and therefore reduce flood risk.

Policy SI13 Sustainable drainage

User:	Kew Society
Paragraph 9.13.3 should state that any direct discharge into the watercourse "must", rather than “should” include suitable pollution preventative measures.	

User: London Borough of Islington

Draft London Plan Policy

Policy SI13 – Sustainable drainage

Islington Response

The Council supports the strengthened wording and amendments to the hierarchy to ensure preference for green over grey features, and the role of green and blue roofs in the drainage hierarchy. We welcome the inclusion of the policy on refusing impermeable paving.

User:	London Tree Officers Association

SI13(B) Development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible in line with the following drainage hierarchy

The LTOA consider that natural attenuation should be listed as number 1. We also consider that trees essential as a solution to sustainable drainage and should be referenced explicitly.

User: Thames Water

We support the policy in principle. Surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding and we therefore support Policy SI13 Part B in this respect.

Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS, where ground conditions are suitable, have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change. We therefore support Policy SI13 parts C&D in this respect.

User:	London Borough of Lambeth

Lambeth supports this policy in general, but seeks clarification on the extent of development proposals applicable to clause C on impermeable surfaces. Is this limited to just dwelling applications, or all development proposals? Please add further information in the supporting text. Current London Plan policy 5.13 does not include specific reference to ‘impermeable paving’ but does refer in the supporting text to the GPDO 2008 restricting permitted development rights for impermeable surfaces within curtilage of dwelling houses.

User: UK Rainwater Management Association (UKRMA)

This input as made on behalf of the UK Rainwater Management Association (UKRMA), the members of which are engaged in the manufacture of goods, and provision of services, related to the management of surface water; the comments below all relate to Chapter-19 of the Draft Plan.

Chapter-19 Overview:

Although it may be convenient and clear to treat the above Policies silo-fashion, they would benefit from being brought together under a broader heading of “Surface-water Management”. This would help set the scene for the Policies by setting-out the need to take an integrated approach to surface-water management, that takes into account future flood and drought risks, water-quality, and broader environmental and amenity needs. Implementation of all surface-water management policies therefore need to be fully integrated.

The UKRMA would be pleased to provide specific, draft brief text in all the above respects, if wished.

User:	London Borough of Haringey
The Council supports this policy.	

User: London Borough of Lewisham

We support SI13 and recognise the important role that sustainable drainage plays.

Opportunities would be welcomed for the Mayor to explore the provision of specialised support in this area through a centralised advisory/consultee resource where Local Authorities do not have the capacity.

Further consideration should be given to:

- Strengthening the wording of SI13 so that proposals for impermeable paving should be refused, including on small surfaces such as front gardens and driveways, unless this can be shown to be unavoidable and contributing to wider benefits.
- How drainage should be managed as close to its source to prevent localised flooding.
- The need to retain existing water bodies and vegetation where possible.
- The need to minimise the effective imperviousness of the development
- The need for small rainfall events to be managed on site.
- The need for overland flow paths where possible to minimise local flooding
- The need to incorporate natural water bodies within storm water management systems.

User:	London Borough of Brent

The Council supports this policy.

The policy and/ or supporting text should support the inclusion of trees in development proposals as a natural way of securing sustainable drainage.

User:	London Borough of Bromley

The policies are broadly supported. The borough’s Strategic Flood Risk assessment supports the Draft Local Plan policy in reducing problems of surface water flooding by requiring development in contributing areas to reduce its impact. It is unclear how useful the encouragement to refuse small impermeable areas would be given permitted development rights, but it is agreed that the cumulative effect of paving small areas is a concern that should be addressed and this could complement the Council’s own policy.

User: London Councils

We have concerns with this policy. The proposed new drainage hierarchy appears muddled, with references to blue roofs at both the top and halfway down the hierarchy. It is unclear why discharge to an open watercourse is at hierarchy 4, and why it features higher than the other forms of rainwater attenuation. The references to refusing proposals that incorporate impermeable surfaces are welcome, although the phrase ‘where appropriate’ could be removed, to be replaced with ‘unless they can be shown to be unavoidable’. The wording in paragraph 9.13.2 that “developments should aim to achieve greenfield run-off” is disappointing. Lower rates of runoff are often achievable but are not offered by developers because of this wording. In some parts of London that have been developed for centuries, it is very difficult to agree what the greenfield nature of a site would be, and this becomes a theoretical exercise.

User: London Borough of Tower Hamlets

The policy is welcomed especially the improvement made to the drainage hierarchy. However we are concerned by the wording used in 9.13.1 which implies that the LLFA are now responsible for the management of maintenance arrangements, which is incorrect as we only review arrangements rather any formalised management of 3rd party SuDS. We welcome the intention and its importance but would suggest it rewritten to make clear that it is incumbent upon the applicant to have robust maintenance arrangements in place.

We are also concerned by the removal of the 50% minimum expectation, which whilst it was used as an arbitrary limit regardless of site conditions, it did ensure legitimate grounds for objection. In contrast this policy may now create an environment whereby developers may demonstrate less reduction due to technicalities and constraints and it will be up to LPA and consultee to challenge this on a case by case/ engineering judgement.

User: Environment Agency

We support Policy SI13, subject to minor strengthening, and welcome the aim for development proposals to achieve Greenfield run-off rates. We welcome the drainage hierarchy within the policy which we consider makes the Plan's expectations clear.

We further welcome the imperative for boroughs (Para.9.13.1) as Lead Local Flood Authorities, to prepare Local Flood Risk Management Strategies, and Surface Water Management Plans. We are actively assisting the boroughs to develop their plans.

We consider that it would support the London Sustainable Drainage Action Plan, and its emphasis on retrofitting, to have that directly supported within Policy SI12.

We recommend that the explanatory text references Chapter 3, 8 and 9's policies. Notably, the Plan's expectation that the consideration of good design, green infrastructure, and integrated water management solutions, will assist in identifying opportunities for development to move up the Plan's sustainable drainage hierarchy.

Recommendations:

- Strengthen policy point B 4), to read: rainwater discharge to a watercourse **via filtering method** (unless not appropriate)'.
- Strengthen policy Point D, such that '…address issues…' is substituted with,'…**that promotes increased water use efficiency, improves river water quality, and enhances biodiversity, amenity and recreation.'**
- We suggest supporting retrofitting, by inserting an additional bullet point E to read, **'Development proposals should demonstrate that they have considered the potential of retrofitting solutions to achieving greenfield run-off rates wherever practicable'**
- We recommend reinforcing the sustainable drainage hierarchy by adding the text in italics below to the end of paragraph 9.13.3, 1st sentence on Page 363 which reads, 'This should include suitable pollution prevention measures, **ideally by using soft engineering and green infrastructure'.**
- We suggest cross-referral to relevant policy objectives elsewhere in the Plan related to good design, public realm, 'greening', and to the requirement for integrated solutions to water management.

User:	Environment Agency

We further welcome the imperative for boroughs (Para.9.13.1) as Lead Local Flood Authorities, to prepare Local Flood Risk Management Strategies, and Surface Water Management Plans. We are actively assisting the boroughs to develop their plans.

Recommendation:

We recommend reinforcing the sustainable drainage hierarchy by adding the text in italics below to the end of paragraph 9.13.3, 1st sentence on Page 363 which reads, ‘This should include suitable pollution prevention measures, **ideally by using soft engineering and green infrastructure’.**

User:	Environment Agency

Recommendation:

We suggest supporting retrofitting, by inserting an additional bullet point E to read, ‘**Development proposals should demonstrate that they have considered the potential of retrofitting solutions to achieving greenfield run-off rates wherever practicable’**

User:	Environment Agency

Recommendation:

Strengthen policy Point D, such that '…address issues…' is substituted with,'…**that promotes increased water use efficiency, improves river water quality, and enhances biodiversity, amenity and recreation.'**

User:	Environment Agency
Strengthen policy point B 4), to read: rainwater discharge to a watercourse **via filtering method** (unless not appropriate)’.	

User:	Royal Borough of Kingston
Generally support, and particularly support **SI13, Part C** which seeks to prevent impermeable surfacing.	

User: London Borough of Hillingdon

The policy on sustainable drainage is generally supported. The Council particularly welcomes the improvements to drainage hierarchy, references to the Local Flood Risk Management Strategies, Surface Water Management Plans and the need to include green and blue living roofs.

The Council also welcomes the reference to refusing proposals that incorporate impermeable surfaces, although the phrase ‘where appropriate’ should be removed and replaced with ‘unless they can be shown to be unavoidable’. In addition, the wording of paragraph 9.13.2 which states that ‘developments should aim to achieve greenfield run-off’ is disappointing. Lower rates of runoff are often achievable, but are unlikely to be offered by developers because of this statement. The policy should state that if greenfield rates are not achievable on site, then off site contributions should be considered, as outlined in the Plan’s current approach to air quality.

In relation to paragraph 9.13.1, whilst the Local Lead Flood Authority (LLFA) leads on the issue of surface water management, there are also a number of other Risk Management Authorities that may have to contribute to resolving the issue. Flooding from sewers is not the responsibility of the LLFA but water utilities companies, who are also defined as Risk Management Authorities. These definitions should be amended.

Water quality should also be linked to the water body status of a particular watercourse, however to do this would require a clear understanding of the catchment and sub catchment areas, provided by the water company.

User:	Marion Lerminiaux

Making London greener is essential for people’s health and wellbeing. Yet many local green spaces face pressure from new development. The Plan must recognise that loss of green space cannot always be made up for through green roofs and sustainable drainage schemes, valuable though these features are (para 4.2.9). Policy should make clear that provision of and access to green space should always be considered when planning new development.

User: London Borough of Merton

Support with amendments Merton generally supports the policy aims are generally but consider that the following should be addressed to improve policy effectiveness.

Part A -Strategic Flood Risk Assessments should also be mentioned, in para 9.13.1.

Consideration should be given to stronger policies for areas that have the ability to generate increased surface water flows but are outside of areas at specific risk i.e. they are contributing to the problem.

User:	London Borough of Merton

Part B - The are some issues with the proposed revision to the drainage hierarchy 1-8. The strategy considers both treatment via SuDS technique such as a green roof and the discharge method, which is a significant change to the existing drainage hierarchy. Point 4 states discharge direct to a watercourse, but does not mention ‘attenuated’ or ‘restricted discharge’ to a watercourse. Point 5 states above ground attenuation but no discharge method, so could be to the combined or even foul sewer. Drain is mentioned in point 7, it is unclear if this also could be a ditch i.e. a watercourse or an unadopted sewer. Further thoughts and revisions need to be considered to this hierarchy to align with LLFAs requirements for SuDS.

User:	London Borough of Merton

Part C - This should be amended to state that all proposed paving should be impermeable, unless appropriate justification is made to the Local Planning Authority. Consideration could be given to incentivising retro-fitting green spaces in front gardens rather than hard paving.

User:	London Borough of Merton

Footnote 136 – there are also other benefits from an engineering perspective, to keeping attenuation above ground level. This allows for biodiversity and amenity gains.

User:	London Borough of Merton

The standards for runoff within the Design and Construction SPG have a stronger bearing and influence on achieving greenfield runoff rates across developments in
London. It is important that this target is retained or improved and could be considered to form part of policy to give this further weight.

User:	London Borough of Hounslow
LB Hounslow supports this policy	

User:	Westminster City Council
It should be noted that the measures identified in criterion C are often permitted development.	

User: London Borough of Southwark

The aim to achieve greenfield run-off rates is supported and policy SI13 could be amended to state that this must be achieved. The Old Kent Road Integrated Water Management Strategy includes recommendations for an offset policy, and an approach to strategic sustainable urban drainage measures where on site greenfield run off rates are not feasible. This will operate to achieve the aims of the new London Plan policy. The policy would be improved with explicit reference to offsetting, whether through retrofit of the existing built environment or through strategic green infrastructure.

Point D of the policy could be strengthened to emphasise the multiple benefits of SUDS integrated with green infrastructure and require these to be considered in their design. These include urban heat management and health improvements.

User:	London Borough of Richmond Upon Thames

The Council supports the principles of the policy and the Drainage Hierarchy which are broadly in line with the Council’s own Flood Risk and Sustainable Drainage Policy, LP21. However funding would be welcome to update surface water management plans in collaboration with neighbouring boroughs.

User:	London Borough of Harrow

SI13: Sustainable drainage

The Council supports this policy.

Policy should link to other policies where these present opportunities for sustainable drainage i.e. Policy G7 Trees and woodlands and Policy D7 Public Realm.

User:	London Borough of Enfield

Policy SI13 ‘Sustainable Drainage’ needs to provide further detail and clarity in the use of the drainage hierarchy approach as it will lead to unintended outcomes. The wording for the hierarchy also needs to be changed. The policy also needs to define ‘greenfield’ runoff rates as runoff from undeveloped sites as it would have been in its natural state. The policy should state that SuDS source control measures should be used as part of a SuDS management train. Source control measures include features such as green roofs, rain gardens and permeable paving – this approach, along with the requirement to intercept the first 5mm of rainfall, will ensure that both water quality and water quantity benefits are achieved. There should be a requirement that all developments are able to capture the first 5mm of rainfall events. Further to this, it should state that direct discharge to a watercourse without any treatment via a source control SuDS measure will not be permitted. Finally, it would be useful to include information on the 5m proximity to building rule, especially in reference to permeable paving near buildings. It should reference that Local Plans should identify areas within their boundaries where infiltration measures could be located much closer to buildings.

User: (FOE) Friends of the Earth England Wales and Northern Ireland

We support this policy, in particular the requirement that "Development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source". We agree that 'Development proposals for impermeable paving should be refused' however suggest that 'where appropriate' be deleted from Criterion C. We support Criterion D that 'Drainage should be designed and implemented in ways that address issues of water use efficiency, river water quality, biodiversity, amenity and recreation'.

Given the challenges London faces from flooding and ageing sewerage infrastructure, we consider this policy would benefit from explicit mention of SUDs techniques, such as Swales, Basins, raingardens, trees, permeable surfaces and an expectation stated in this policy that the Mayor expects SUDS techniques to be employed in all new developments. A cross reference in supporting text to the Mayor’s Sustainable Drainage Action Plan would also be helpful.

User: HTA Design LLP

Policy SI13B1 suggests development should give consideration to provision of rainwater harvesting including blue roofs; the technical feasibility and cost of delivering such solutions. In addition, roofs of developments are under pressure to function efficiently, with competing demand to be used as rooftop amenity space or children's play space, green and brown roofs, blue roods, and space for photovoltaic cells, amongst other items not necessarily of strategic priorities, but often needed from a functional perspective to deliver buildings, such as rooftop plants, or telecommunications equipment. This is particularly relevant to higher density development. The Mayor should give stronger consideration, and outline clearer guidance on his priorities for how roof space should be used in development proposals. With changes expected within the NPPF regarding permitted development rights for 'building up', we would be interested to see if the Mayor would consider incorporating specific London wide guidance on considerations that should be incorporated at this small scale to ensure the maintenance of sustainable infrastructure.

User: Just Space

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

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

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

What Needs to be Done:

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

— Sustainable urban drainage systems

— Stopping the leaks

— Increase in river and canal transport for passengers and freight, including waste and construction materials

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

Incremental, low impact small scale interventions should be promoted.

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

Making London a Blue Green City

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

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

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

Sustainable Urban Drainage System (SuDS)

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

What Needs to be Done:

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

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

User: London Borough of Bexley

Part A of **Policy SI13 Sustainable drainage** should remove the reference to SWMPs – see comment in paragraph 9.9 above. **Part B** of **Policy SI13** should remove the word '*aim*.' Development proposals should achieve greenfield run-off rates as a minimum requirement. In addition, the wording in **Paragraph 9.13.2** '*developments should aim to get as close to greenfield run-off rates as possible*' is disappointing. Lower rates of runoff are often achievable but are not offered by developers because of this wording. In some parts of London that have been developed for centuries, it is very difficult to agree what the greenfield nature of a site would be, and this becomes a theoretical exercise.

Whilst the Council supports the drainage hierarchy as set out in **Part B** of **Policy SI13**, it would greatly support a line added to the end of the hierarchy stating '*the discharge of surface water into foul sewer is not acceptable*.' The reference to refusing proposals that incorporate impermeable surfaces in **Part C** of **Policy SI13** is welcome, although the phrase '*where appropriate*' should be replaced with '*unless they can be shown to be unavoidable*.'

User:	SEGRO
SEGRO already aims for BREEAM Excellent in this area but we require further information on requirements for grey/rainwater harvesting. In our experience the trials that have been undertaken show such systems are costly to maintain.	

User: Thames Regional Flood and Coastal Committee

We also have concerns that the flood risk implications of the small sites policy have not been fully assessed. Sites of this size are not sequentially tested in terms of flood risk and would have to be dealt with as part of the windfall sites process, which does not allow the Local Planning Authority to plan for an appropriate level of mitigation. Proposals for sites which are not classed as major development are not required to provide sustainable drainage information as part of their applications. In addition, sites under 1 hectare do not require Flood Risk Assessments and proposals for the extension or conversion of existing properties have limited requirements. Given these limited requirements and the scale of development expected to come forward from small sites, the cumulative impact of the proposed approach has the potential to significantly increase flood risk. In addition, the policy does not comply with the requirements of policy SI12 to manage current and expected flood risk in cost effective way and well as supply appropriate infrastructure and mitigation.

We support Policy SI13, subject to minor strengthening, and welcome the aim for development proposals to achieve Greenfield run-off rates. We welcome the drainage hierarchy within the policy which we consider makes the Plan's expectations clear.

We further welcome the imperative for boroughs (Para.9.13.1) as Lead Local Flood Authorities, to prepare Local Flood Risk Management Strategies, and Surface Water Management Plans. We have actively encouraged the boroughs to develop their plans.

We consider that it would support the London Sustainable Drainage Action Plan, and its emphasis on retrofitting, to have that directly supported within Policy SI12.

We recommend that the explanatory text references Chapter 3, 8 and 9's policies. Notably, the Plan's expectation that the consideration of good design, green infrastructure, and integrated water management solutions, will assist in identifying opportunities for development to move up the Plan's sustainable drainage hierarchy.

Thames RFCC Response:

Recommendations

Our recommendations for changes to the Plan The Plan should assess the flood risk implications of the small sites policy on other policies within the Plan.

SI13:

? Strengthen policy Point D, such that '…address issues…' is substituted with,*'…**that promotes increased water use efficiency, improves river water quality, and enhances biodiversity, amenity and recreation.'***

? We suggest supporting retrofitting, by inserting an additional bullet point E to read**, *'Development proposals should demonstrate that they have considered the potential of etrofitting solutions to achieving greenfield run-off rates wherever practicable'***

? We recommend reinforcing the sustainable drainage hierarchy by adding the text in italics below to the end of paragraph 9.13.3, 1st sentence on Page 363 which reads, 'This should include suitable pollution prevention measures***, ideally by using soft engineering and green infrastructure'.***

? We suggest cross-referral to relevant policy objectives elsewhere in the Plan related to good design, public realm 'greening', and to the need for integrated solutions to water management.

User: Canal & River Trust

In many circumstances and subject to the Trust's agreement, surface water can be (and is) sustainably drained from developments into our waterways, thus reducing the pressure on mains drainage infrastructure and helping to manage flood risk. We are supportive of this in principle, subject to water quality, discharge rates and the consideration of works needed to our infrastructure to allow water to be discharged. Particularly in the case of major regeneration areas and at the city-wide scale, we consider that our waterways should be seen as part of the strategic sustainable urban drainage and flood risk management network. The Trust welcomes the recognition of the potential for rainwater discharge direct to a watercourse in the drainage hierarchy.

We suggest that in point D, consideration of water quality should not be limited to rivers. It is an important issue to be considered when assessing a proposal to discharge water to one of the Trust's canals in London. In the interests of London's sustainable development, we suggest that the policy should be amended as follows:

D Drainage should be designed and implemented in ways that address issues of water use efficiency, ~~river~~ water quality, biodiversity, amenity and recreation.

The Trust's concerns about water quality related to surface water discharge in London often stem from concerns about contamination of development sites. We are surprised that the London Plan does not contain a policy on land contamination.

User: London Environment Directors' Network (LEDNet)

Policy SI13 Sustainable drainage

We are concerned that the new drainage hierarchy is muddled, with references to blue roofs at both the top and halfway down the hierarchy. We are unclear why discharge to an open watercourse is at hierarchy 4, and why it features higher than the other forms of rainwater attenuation. We recommend that this is clarified.

We welcome the reference to refusing proposals that incorporate impermeable surfaces, but propose that it should be strengthened:

C Development proposals for impermeable paving should be refused ~~where appropriate~~**unless they can be shown to be unavoidable**, including on small surfaces such as front gardens and driveways.

We are disappointed with the wording in paragraph 9.13.2 that "developments should aim to achieve greenfield run-off". Lower rates of runoff are often achievable but are not offered by developers because of this wording. In parts of London that have been developed for centuries, it is very difficult to agree what the greenfield nature of a site would be, and this then becomes a theoretical exercise.

User: London Wildlife Trust

We welcome and support Policy SI13 in principle, but recommend that Part B should be amended to reflect a more realistic drainage hierarchy:

B Development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible in line with the following drainage hierarchy:

1. Infiltration techniques including rain gardens/swales
2. Green/blue roofs
3. Rainwater harvesting for domestic greywater use
4. Attenuation in open water features for gradual release
5. Attenuation above ground
6. Discharge to a watercourse via filtering method e.g. reedbed/wetlands
7. Attenuation below ground
8. Discharge to surface water sewer
9. Discharge to combined sewer

Part C is somewhat weak: 'where appropriate' is a very much open to interpretation we recommend replacing with:

C Development proposals for impermeable paving should be refused ~~where appropriate~~ where suitable permeable surface is available, including on small surfaces such as front gardens and driveways.

The drainage hierarchy should also take into account local geology, and especially on large developments, opportunities to contribute to aquifer recharge should be identified (this links to Policy SI5). We suggest adding to Part E:

D Drainage should be designed and implemented in ways that address issues of water use efficiency, river water quality, aquifer replenishment, biodiversity, amenity and recreation.

User:	Silvertown Homes

We object to the blanket ban on impermeable paving.

The merits or otherwise of the use of permeable paving should be considered on a site-specific basis and costs / benefits taken into account.

User:	West London River Group

We suggest that any direct discharge into the watercourse **must** include suitable pollution prevention measures. This should apply to all boats/houseboats moored along any waterway.

User:	Camden Town Conservation Area Advisory Committee
We strongly welcome this policy on sustainable drainage on driveways etc.	

User: Natalya Palit

Policy SI13B1 suggests development should give consideration to provision of rainwater harvesting including blue roofs; the technical feasibility and cost of delivering such solutions should be fully assessed if this is to be included within future revisions of the Plan. In addition, roofs of residential developments are under pressure to function efficiently, with competing demands for use as rooftop amenity space or children's play space, green and brown roofs, blue roofs, and space for photovoltaic cells, amongst other items (not necessarily of strategic concern, but often needed as functional requirements) such as rooftop plants, or telecommunications equipment. This is particularly relevant to higher density development. The Mayor should give this stronger consideration and outline clearer guidance on his priorities for how roofspace should be used in development proposals. This could be in the form of supplementary planning guidance. For example, development decisions around which of these competing uses can be delivered on a rooftop are often driven by any financial off-set contributions which are required where expectations cannot be met. E.g. if a borough's financial contribution to offset children's playspace is cheaper than the financial contribution to offset shared amenity space then the provision of general shared space would take priority over delivering children's playspace. This can equally be applied to PV. The Mayor could consider whether it is appropriate to provide further guidance to boroughs on this aspect.

User:	Barratt Developments plc

We object to the blanket ban on impermeable paving.

The merits or otherwise of the use of permeable pavingshould be considered on a site-specific basis and costs /benefits taken into account.

User:	The Forestry Commission
SI13 Sustainable Drainage - Trees can play a key role in reducing stormwater as evidenced in the i-Tree report; they provide multifunctional solutions including sustainable drainage.	

User: London Borough of Sutton

SUPPORT WITH CONDITIONS. The London Borough of Sutton supports the Mayor's drainage hierarchy in Policy SI13 and the target for all developments to achieve greenfield run-off rates where feasible. However the policy wording should be strengthened by deleting the words 'aim to' from Part (B) to read "Development proposals should achieve greenfield run-off rates…" Policy SI13 should also clarify how climate impacts should be factored in and state whether any reduction in run-off volumes is expected as well as seeking to reduce run-off rates to greenfield levels.

It is also considered that this policy should expand upon the proposals set out in the London Sustainable Drainage Action Plan, e.g. the need to exploit opportunities for retrofitting SuDS measures in urban areas at risk from surface water flooding and/or overheating as part of highways improvements, transport schemes and area regeneration projects.

User: Persimmon Homes

Part B is unsound because it is unnecessarily prescriptive

Part B contains a ‘drainage hierarchy’. Given the overall requirement of part B to achieve green field run off rates and ensure drainage is managed as close to source as possible, it is unduly prescriptive to prioritise the use of one measure over another. All these measures could play a part in ensuring the overall objective is met. In the event that the overall objective of achieving green field run off is achieved, it is unnecessary to justify why one measure is being use in favour of another. The hierarchy heavily favours the use of green and blue roofs without justification. Such measures would significantly increase the complexity and cost of build. Furthermore, they need long term specialist management measures which again add complexity and cost.

It is recommended that the hierarchy is omitted. If a hierarchy is deemed necessary, it should revert to that at Policy 5.13 of the current London Plan.

In terms of Part C, impermeable paving is not harmful whereby there is a satisfactory drainage scheme and green field run off is achieved. Impermeable paving may be required in areas where ground conditions do not allow for infiltration drainage. A blanked ban on impermeable paving is not necessary. If this is directed at the conversion of gardens into parking areas, the policy should make this explicit.

User: London Borough of Newham

Policy SI13 Sustainable Drainage

LBN support this policy, but submit that the sentence at 9.13.1 should be revised to give a more accurate representation of the LLFA's role: *'Lead Local Flood Authorities have responsibility for managing surface water drainage through the planning system, as well as maintenance arrangements'.* The LLFA are not responsible for the direct management and certainly not maintenance of surface water drainage systems: reference to the duties created by the 2010 Flood and Water Management Act should be made.

In addition, for consistency across London, the plan should specify how it expects greenfield run-off to be calculated. A more precise definition should be provided since for example, 'undeveloped site' means different things to different people and soil type (affecting calculation outcomes) is often done arbitrarily / inconsistently. The Newham Local Plan references the DEFRA / EA report Rainfall runoff management for developments (SC030219) published October 2013

User:	Landscape Institute London

SI13 B - LIL supports the proposed hierarchy of preferred SuDS proposals for surface water run-off given in this section. However, we note that whilst a ‘drainage hierarchy’ is identified, including the recommendation to prioritise rainwater harvesting, blue, green and brown roofs and above ground attenuation with lowest ranking given to the currently very popular below ground attenuation tanks (no benefit to people or wildlife) or simple connection to existing sewers (no longer permitted except in special circumstances?), it does not specifically mention rain gardens, swales, SuDS (although similar is referred to), or the value of tree roots which can help to absorb surface water flooding.

User: Natural England

Sustainable drainage systems can make a substantial contribution to enhancing biodiversity, improving the water quality and ecological integrity of watercourses and increasing green cover, , and would therefore complement green cover objectives as well as biodiversity policies in Chapter 8. Therefore, as per the Environment Agency's response, **we recommend** that point D of this policy read '*…address issues of water use efficiency, river water quality, **and enhances** biodiversity, amenity and recreation.'*

We support the measure in B for development to achieve greenfield run off rates, but **recommend** that the policy refers to best practice guidance such as the CIRIA SuDS Manual. We also **recommend** that a measure is included to encourage Boroughs to work across administrative boundaries at the catchment scale, in order to devise strategies which support the provision of the right scale and type of sustainable drainage systems in the most appropriate locations.

It is important for SuDS to be appropriately maintained so as to safeguard their function. Therefore we **recommend** that this policy incorporates the following text: *'Boroughs should seek to identify appropriate sources of funding for the maintenance of SuDS'.*

User:	Chairs of Camden's Conservation Area Advisory Committees

We strongly welcome this policy on sustainable drainage on driveways etc.

User: CIBSE

We support the overall objectives but would welcome the introduction of clearer and more specific criteria. Sustainable management of surface water should be applied everywhere, not just in areas where it is already an issue.

We would also recommend the use of a holistic approach with recognition of the potential contribution by green infrastructure – see response to Chapter 8.

SI13-D: We support the attention to small measures such as the hard surfacing of front gardens and driveways, as they can incrementally have a large effect.

User:	Hornsey & Wood Green Labour Party
Not allowing this in London is supported	

User: Redrow Homes London Division.

We object to the blanket ban on impermeable paving.

The merits or otherwise of the use of permeable paving should be considered on a site-specific basis and costs / benefits taken into account.

User:	L&Q

Impermeable paving and sustainable drainage

We object to the blanket ban on impermeable paving. Drainage and landscape plans already take the relevant matters into account.

The merits or otherwise of the use of permeable paving should be considered on a sitespecific basis and costs / benefits taken into account.

User: Taylor Wimpey UK

Policy Sl13 Sustainable drainage

It is unreasonable to unilaterally specify green-field run-off rates in London. Almost all residential development sites in London will be on previously developed land.

The biggest challenge with Sustainable Drainage is the long-term maintenance - for example permeable paving, ponds and swales will silt up,and periodically will require expensive maintenance for the lifetime of the development. This is strongly linked with adoption of Sustainable Drainage features which is often strongly resisted. Another general challenge is site layout efficiency- if more land is needed for Sustainable Drainage then to maintain land values there may need to be higher density developme nt (e.g. more apartments) which would not work in every location. There are also technique specific challenges - pervious pavements and soak-a-ways can damage foundations; any risk of drowning needs to be managed in ponds and swales; and stronger buildings are needed to hold up the weight of a green roof. Some Sustainable Drainage techniques are not appropriate in some circumstances e.g. soak-a-ways near structures or where there is a risk that contaminated land could add to gro undwater pollution. We understand that government does not want property owners to pick up the additional costs of Sustainable Drainage which could challenge viability. Silt in ponds and swales may become contaminated for example by zinc from car tyres or hydrocarbons, and therefore may be difficult and costly to dispose of. In urban areas there may not be sufficient space to install much Sustainable Drainage.

User:	Kew Society

Policy SI13 Sustainable drainage

Paragraph 9.13.3 should state that any direct discharge into the watercourse "must", rather than “should” include suitable pollution preventative measures.

User:	London Borough of Camden

The Council supports the Mayor’s continued commitment to achieving greenfield run off rates and application of the drainage hierarchy.

User:	London Borough of Camden

We would welcome guidance to confirm and reinforce the approach to sustainable drainage which will assist us in implementing our policies. This could incorporate stronger wording around greenfield run-off rates, for example a tightening up of the ‘backstop’ rate (currently 50% of existing), to be expressed instead in relation to greenfield rate, i.e. “greenfield plus 100%, or 50% of existing, whichever is lower.” We would also support additional compensatory measures being required when impermeable areas are expanded.

User:	British Water

1. For the Sustainable drainage hierarchy (Section SI13 B), would below ground attenuation (option 6) be allowed for the purposes of infiltration (option 2) or are all below ground tanks a lower priority? We believe additional clarification of terminology is required.

User:	Primrose Hill Conservation Area Advisory Committee
SI 13 C We strongly welcome this policy on sustainable drainage on driveways etc.	

User:	London Borough of Enfield

Policy SI5 looks at ‘Water Infrastructure’ but it needs to include a commitment from the mayor that the GLA will work with water supply and sewage companies in supporting anticipated growth. Measures such as smart metering, water saving and recycling measures have to be incorporated. SUDs should be applied to all development and not just in areas of flood risk as all areas are part of a catchment.

User:	Regent's Park Conservation Areas Advisory Committees
SI 13 C We strongly welcome this policy on sustainable drainage on driveways etc.	

Policy SI14 Waterways - strategic role

User:	Mr Sydney Charles

A policy should be added to always consider unculverting Londons underground streams where appropriate. Upstream misconnections of sewage should not be used as a reason to leave these assets hidden. Where such culverts contain sewage enforcement should be firm and effective.

User: Redrow Homes London Division.

This policy encourages Boroughs to produce joint Thames Strategies. As currently drafted, it is unclear what weight would be given to these Strategies and how they would relate to the London Plan, Safeguarded Wharf's, OAPFs, Local Policies or SPDs.
Producing such strategies must not be a redundant and onerous requirement. They must therefore perform a new function alongside the policy framework that already exists.

Greater clarity must be provided or Part B pf Policy SI14 removed.

User:	London Parks and Gardens Trust

The Trust notes that although there is reference to the strategic importance of the Waterways there is no definition of this role. These are important spaces and deserve designation in their own right as blue spaces that also have an impact on biodiversity and well-being

User:	Kent County Council

Add a new C to re-enforce environmental services

D To develop a riparian network for nature across London incorporating natural regeneration and planting of a new urban forest delivering a range of environmental services and enhancing local landscape and biodiversity.

User: Cross River Partnership

This emphasis on riparian Boroughs working together is welcome overall. However, the Policy could beneficially be strengthened by specifying a requirement on the Mayor, working jointly with the Boroughs, perhaps via Cross River Partnership (CRP) to draw up an overall Thames Strategy for the management of the River Thames across Greater London. This agreed strategy could then provide the basis for borough Thames Strategies and local development plans.

So while Policy SI14 is especially welcome in encouraging the identification of Thames Policy Areas, further guidance on the specific policy content for Thames Policy Areas in Borough Local Plans and neighbourhood plans would be welcome. It would also be welcome if mention was specifically made of the inland waterways that are linked to the River Thames.

User:	Taylor Wimpey UK

We are supportive of the waterways policy's for London.

User:	Kingston First

Finally, as a river side location. Kingston First supports the continued promotion of the River Thames and other linked watercourses as a strategic route for freight and passenger transport throughout London, as set out in draft Policies SI4, SI5 and SI6. Kingston and the surrounding area already benefit from privately operated passenger river boats, but the route should be promoted more readily as a viable transport link.

User: Kew Society

Policy SI14 Waterways-strategic role

1. Paragraph 9.14.2 should also refer to the need to protect the Thames from inappropriate high or medium rise developments, preserving it as a unique backdrop to heritage assets, including the Royal Botanic Gardens, and an important corridor of biodiversity, which needs protection from light pollution, as well as preserving it as an oasis for calm recreational enjoyment. Reference should also be made here to the need to restrict the heights not only of buildings but of moored boats to protect vistas, taking account of the changing impact of tides on heights and vistas.

2. In *paragraph 9.14.5* on setting the boundary of Thames Policy Areas (TPAs) we suggest the wording should be changed to require consultation with neighbouring authorities, including those across the river, by changing “should” to “must” and similarly that in defining boundaries, boroughs “must” rather than “should” have regard to the listed issues, all of which are very important.

3. In *Paragraph 9.14.8* the removal of Metropolitan Open Land (MOL) protection for the River Thames is not acceptable. The reason proposed is that this protection might restrict the use of the river for transport infrastructure related uses. The NPPF Chapter 9 “Protecting the Green Belt” (whose protections are extended to MOL) sets examples of development that might not be *inappropriate* on such land, one of which is local transport infrastructure which can “demonstrate a requirement for a Green Belt location”. Such infrastructure could be approved for MOL on that basis. There is therefore no need for removal of MOL protection for the reason given in the draft Plan. Furthermore, the draft London Plan wording of “related uses” is open to wide interpretation that could lead to inappropriate development on the river. Whilst the River Thames will benefit from the other policies for open spaces and waterways set out in the Plan, these are less robust protections. The fundamental importance of the Thames to London (and indeed to the UK symbolically), in history, leisure and sport, biodiversity, culture and inclusion (everyone can enjoy the Thames) is difficult to overstate. It deserves the best protection for present and future generations.

User:	London Borough of Camden
This could be strengthened by referencing the evidence that London’s waterways have a beneficial effect on health and wellbeing.	

User:	Mrs Hilary Pereira

This response is on behalf of the River Thames Society (RTS). It is noted many of the proposals are only indirectly related to the river, and even when water space is mentioned, it could as easily relate to the canals. There is much agreement with the plan overall as it affects the Thames.

User:	Association of Directors of Public Health

we wish to emphasise the importance of waterways as multifunctional assets, particularly in terms of health and wellbeing.

We recommend an addition, taken from supporting text, to Policy SI14 Waterways – strategic role (and to support Policy SI16) to add a new C: **Continue to develop London's waterways as** (delete are) **multifunctional assets. They provide transport and recreation corridors; green infrastructure; a series of diverse and important habitats; a unique backdrop for important heritage sites, landscapes, views, cultural and community activities; and drainage, flood and water management functions. As such, they provide environmental, economic and health and wellbeing benefits for Londoners.**

Policy SI15 Water transport

User: SEGRO

We support the intent of this policy to maximise the use of water transport and facilitate an increase in the amount of freight transported by river. However, we also notes that the Draft London Plan needs to be realistic about the extent to which river freight is and will be used as an alternative to road, and should investigate measures which could help to make such modes more attractive. For instance, river freight is considered to be slow and so would need to focus on goods that were not time sensitive, it would also need to be supported by sufficient infrastructure on the river banks to load and unload goods. There is also the add fact that goods will inevitably need to be transported by road at either end of the river/rail route.

We recommend that the Mayor fully explores the factors currently limiting further use of the river for freight, and suggests that the final London Plan proposes effective actions to make river transport a more attractive alternative to road.

User:	U+I

Paragraph B acts to sterilise any boatyard even if not required and able to offer attractive housing opportunity – and should therefore be deleted. The suggested scope for ‘regular’ review of strategic safeguarded wharves would cause uncertainty for investment decisions and should be limited to once every 10 years. For criterion e, redevelopment should also be supported where equivalent or improve wharfage facilities are provided elsewhere.

User: Canal & River Trust

We support the requirement for development proposals close to navigable waterways to maximise water transport for bulk materials during demolition and construction phases in part I of the policy. This is carried through from the existing London Plan. However, our experience is that the policy rarely leads to the use of waterways for the transportation of demolition and construction materials. We question whether the plan could go further by requiring developments adjacent to navigable waterways above a certain threshold (those referable to the Mayor, for example) to submit a feasibility assessment that considers the opportunity to use waterborne freight in this way as part of their transport assessments. Having this information at the time an application is determined (and s106 agreed) would allow the decision maker to balance the benefits against any impacts on development viability.

User: London Wildlife Trust

We remain concerned that the protection of waterways (Policy S17) comes as a final policy within this draft Plan; in our view this should be set out before the policies for transport and leisure.

We recommend that Part C of Policy SI15 is amended to:

C Development proposals to facilitate an increase in the amount of freight transported by river should be supported if they can demonstrate no adverse environmental impacts on the waterbody.

User: The Crown Estate

We support Policy SI15 in its aim to safeguard and protect inappropriate development that may curtail or prevent waterborne freight, in line with Agent of Change principle. We also support the aim of re-activating out of service wharf locations and encouraging an increase in waterborne freight on the river Thames and associated waterways.

An annual report prepared by The Crown Estate provides an understanding of the nature of UK dredging and marine aggregates supply at a regional level; identifies the grades of material available within each region and provides an overview of the range of projects and locations where marine aggregates have been successfully used. The current version of the document can be found at http://www.thecrownestate.co.uk/media/1097988/bmapa-ce-19th-ann-rep-singles-021117.pdf

User:	London Travel Watch

This policy supports development proposals to facilitate an increase in the amount of freight. London TravelWatch supports this proposal insofar as freight journeys undertaken by river will reduce the demand on London’s streets.

User: Chartered Institute of Logistics & Transport

Policies SI14, SI15 and SI16 cover water transport which is of course sustainable transport infrastructure but only briefly mention rail transport, which is also sustainable but provides much wider coverage. Rail transport is covered in Chapter 10 but even here there is a lack of consideration of rail freight as a sustainable mode.

We therefore suggest that there should be specific policies in this chapter on land use for rail freight. Such a land use strategy is crucial, since we consider that one of the most attractive options for reducing emissions from logistics activity in London (consistent with Policy SI1) is to convey freight, both consumer goods and bulk materials, from source or distribution centre by electrically-hauled train to intermodal terminals on the edge of the city (e.g. Willesden or Cricklewood), from where it could be delivered by electrically powered lorries to final destination, be it a store, online shopping collection point or construction site. The limited operating range of electric lorries is less of a constraint with such short distance deliveries and this model would avoid the cost and time penalties associated with consolidation centres. The reverse logistics of roll cages, packaging materials and recycling/waste can use the same intermodal terminals, containers and trains on the return leg (consistent with Policy SI8). Rail can offer wide coverage across London boroughs and is a viable alternative to road for Fast Moving Consumer Goods, including chilled and frozen products (which already move by rail in the UK on a daily basis). For aggregates we suggest that a policy similar to SI15 should seek to protect railway depots for importing crushed rock from other parts of the UK. We recommend strongly that policies should be adopted for the protection and development of London's rail infrastructure for freight and logistics activity.

User:	London Borough of Newham

Policy SI15 Water Transport

LBN are generally supportive of the policy which is complementary to Newham's Draft Local Plan, particularly greater emphasis on protection of river transport capacity, sustainable freight and reference to the Agent of Change Principle to manage potential conflicting land uses. However, we submit it would be better situated within the transport chapter with cross references from this chapter

User:	Central Bedfordshire

Minerals and Waste

• We welcome and strongly support the overall strategy for minerals and waste, in particular:
• The provision for safeguarding aggregate wharves and railheads (PoliciesT7, SI10 and SI15);
• The emphasis on recycled aggregates, whilst at the same time seeking to maintain aggregate landbanks (Policy SI10);
• The safeguarding of aggregate resources (Policy SI10)
• The reduction and minimisation of waste, aiming at a circular economy (Policy S17);
• Waste self-sufficiency by 2026 (Policy SI8);
• The safeguarding of waste management sites (Policy SI9);
• The ‘Agent of Change’ principle (Policy D12) which will assist in safeguarding existing mineral and waste sites.

User: Berwin Leighton Paisner LLP

A central strategic theme of the existing London Plan and the draft London Plan is the protection and enhancement of the use of the River Thames as part of London's passenger transport network. We support this policy objective and the Mayor's target (paragraph 9.15.1) of increasing the number of people travelling by river on passenger services to 20 million by 2035 .

Upgrading and expansion of the existing passenger pier network is essential to achieve the Mayor's target. TfL's River Action Plan (2013) provides further strategic guidance on the opportunity presented by the pier network for place-making as part of the enhancement of existing piers. The River Action Plan recognises that encouraging investment in piers leads to (a) improved waterway transport capacity and services and (b) realisation of opportunities to create interesting destinations in their own right which encourage public access to the waterways.

The River Action Plan set a target to increase passenger journeys on the Thames to 12 million a year by 2020 (which will be superseded by the Mayor's ambitious 2035 target). It also includes plans for "improvement in the quality of public realm integrating the river pier to the city and other transport interchanges" (page 9); "enhancing place value of piers for tourists as well as locals" (page 9); "infrastructure improvements to piers" (page 20); "promotion of piers as destinations" (page 21) and the opportunity to explore provision of "high quality public realm". Reference is also made to the need to seek financial contributions from a joint developer or sponsor.

This "win-win" scenario provides conditions to encourage private sector investment in upgrading or creation of new pier facilities alongside high quality wider uses such as leisure or certain commercial uses which, as part of a high quality fully integrated scheme, would be complementary to place making objectives. We understand that a new Pier Strategy is to be published in draft which we trust will seek to build on the principles and objectives of the River Action Plan. At this time the draft Pier Strategy is not available and given its prominence in the draft London Plan policies, we reserve the right to supplement these representations in the light of the draft Pier Strategy when it is eventually published (which we trust will be in good time for the next stage of the draft London Plan process).

Against the above background, we consider the draft London Plan policies are unduly restrictive in respect of the precise form of development and uses which could come forward to unlock the full potential of the waterway pier and transport network. We consider that in order to achieve the Mayor's overarching objectives for river passenger numbers, the policy framework should therefore allow some additional flexibility which would need to be considered on a case by case basis for proposals coming forward. The range of locations piers are situated in, from Central London tourist areas to more commercial and industrial sites to the East, militates against a "one size fits all" policy approach. In our view, the planning harm from an overly narrow policy approach would be to deter potential investment in the pier network. Private sector investment, as recognised in the River Action Plan, is fundamental to achieving the Mayor's objectives for enhancement of the river passenger transport and the approach of the draft London Plan policies would therefore risk working against those objectives.

User:	Berwin Leighton Paisner LLP

Development proposals should protect and enhance existing passenger transport piers and their capacity. New piers and proposals to enhance existing piers and promote place-making opportunities through such proposals will be supported in line with the Port of London Authority and Transport for London's Pier Strategy. The necessary provision of moorings, waste and sewage facilities for passenger vessels should be provided." (SilS A).

User: BAE Systems

Water transport and protecting our waterways (Policy SI15 / Policy SI17)

We are supportive of proposals to increase the use the Thames for development related freight traffic. However, this policy risks simply shifting emissions from road transport to the river.

To mitigate this, emission reduction technologies should be considered, including stricter engine standards for the river and hybridisation. Furthermore, this should be looked at in conjunction with the Port of London's new Air Quality Plan.

The technology exists to support such changes today. We would welcome the opportunity to work with the Mayor and his team to make this a reality.

User: Commercial Boat Operators Association

CBOA is aware of the estimate given that London's roads will have insufficient capacity for passenger, freight and delivery purposes in 5 years time, with the increase in London's population and so the increasing need for freight and delivery transport. To this end it is vital that more emphasis is put on using the available rail and water transport options; the latter with the canals and navigable rivers.

Whilst housing is important, it is vital that water side land and premises that have the potential for water freight or delivery purposes is not used for housing. This land category must be kept for future use for delivery and freight. This is especially true for canal and river side wharves, which must be protected. It would be false forward planning policy to deny future use of land for much needed freight or delivery operations because of housing development which could be sited elsewhere without causing this potential transport infrastructure loss.

User:	London Borough of Ealing

Water Transport
(SI15 C)

The text here should promote the use of all waterways for transporting freight, and not just rivers. For example, the canal network could also support this activity.

User: Friends of Regents Canal

My other main concern is that the new policies place too much emphasis on the River Thames while the canals get little or no attention. For example, in Policy SI15 paragraph C ("Development proposals to facilitate an increase in the amount of freight transported by river should be supported") the word "river" should be replaced by "river and canal".

Whilst the river can accommodate much larger volumes of freight transport than the canals, the canals can still make a valuable contribution to the modal shift from road to water and they can help to deliver non perishable goods right into the heart of London.

User:	Chairs of Camden's Conservation Area Advisory Committees

SI 15 after para 9.15.9. We request the addition of a new para 9.15.10.

Our proposed amendment – reasoning: to ensure the inclusion of canals, which contribute significantly to local character and distinctiveness, as well as offering sustainability gains.

Our proposed additional text: ‘9.15.10 The opportunity to expand the numbers of safeguarded wharves should be extended to the canal network.’

User: Grafton Group Plc

We wish firstly to note that it is understood that the anticipated safeguarded wharves review (SWR) that was to be run in parallel with this consultation has now been delayed and will not take place until this summer. It remains our client's view that there is no clear evidence on which to retain the safeguarding on Orchard Wharf and this is a point that that will be pursued further through the SWR process in due course. The following observations on this policy are submitted without prejudice to this position.

In terms of the policy itself we support the important amendment to current policy and in particular the addition of criterion (G). This states that: "Development proposals that include the provision of water freight use on a safeguarded wharf, with other land uses above or alongside, will need to ensure that the development is designed so that there are no conflicts of use that the freight handling capacity of the wharf is not reduced."
This is a very welcome clarification as it clearly envisages development above safeguarded wharves along the lines of that consented at Albert, Swedish and Comley's Wharves and Cringle Dock. These schemes clearly show that there is significant opportunity for development above operational wharves without materially impacting on their functional capacity.

Such proposals on Orchard Wharf have historically been resisted by the Port of London Authority (PLA) through the historical failed appeal and CPO Inquiries in respect of the site.

This proposed shift in approach is, however, consistent with more recent discussions with Robin Mortimer, Chief Executive at the PLA and is strongly supported. Furthermore, it will help ensure other key objectives of the London Plan as dealt with above can be met; particularly in terms of housing delivery.
However, we feel that greater clarification is provided on how this new criterion will be applied in terms of requirement to ensure that the freight handling capacity of the wharf is not reduced.

Failure to provide such clarity is likely to delay and frustrate the important opportunities afforded by this change in policy. By allowing development above safeguarded wharves the policy is implicitly accepting the loss of some of the wharf given the need for built form to have a ground floor presence. As such it is self-evidently impossible for such development to 'protect' 100% of the safeguarding and hence 'existing' capacity.

We therefore suggest clarification within either the policy or supporting text as to how an assessment of impacts on freight handling capacity will be assessed. This raises a whole series of questions including the following:

- Should a site’s freight handling capacity be assessed based on current site conditions?
- Clarification on what freight handling use should be assessed as there are not usually specific uses attached to specific sites?
- There should be an allowance to assess how a site’s capacity (based on a site’s current condition) can be replicated through operational efficiencies included within any redevelopment.

We consider that such clarification is essential to the soundness of the Plan to ensure that this policy is effective as required by the NPPF. Failure to do so could also result in unnecessary direct conflicts with other policy objectives e.g. Policy D6 Optimising housing density.

User:	Sustrans

SI15 C – Water Transport

Support to increase freight transported by river for benefits it may have for road danger reduction as set out in 9.15.4.

User: Mr Igor Dyakov

As architect and citizen of Saint-Petersburg Russia, one of most beautiful cities in Europe, which is located on the number of islands, surrounded by canals and rivers, I want to encourage the development of water public and tourist transport as it is appointed in a strategy of spatial development of London. Development of water transport combined with active engagement of former industrial areas with their canals and rivers is to deliver the new kind of water public spaces inside new commercial, residential or mixed-use developments which can present alternatives to traditional public parks and squares. As an example please find attached the concept for this kind of public space for regeneration of Fulham gasholder in London Borough of Hammersmith and Fulham which was proposed by my team in beginning of 2017 or see the link below.

User:	Hornsey & Wood Green Labour Party

We support these policies, except the sections on moorings should specify that only low carbon fuel and electricity should be provided. Vessels docking with high air pollution should be banned. The same point applies at: **SI16 Waterways – use and enjoyment** and **SI17 Protecting London's waterways** at E. and 9.17.3.

User: Aggregate Industries UK Ltd

Draft Policy SI15, Water Transport, and Supporting Text

Policy SI15 and the supporting text, which will replace Policy 7.26 of the Adopted London Plan, is broadly welcomed but would benefit from further clarification and amendment particularly to make it consistent with the NPPF and therefore sound. It is confirmed that we concur with many of the PLA's suggested amendments to this policy, and in line with the PLA's representations, the following amendment to this policy are proposed:

C. Development proposals to ~~facilitate an increase in the amount of freight transported by river should be supported~~ that seek to maximise the amount of freight transported by water will be supported.

User:	Mr Sydney Charles

We support these policies, except the sections on moorings should specify that only low carbon fuel and electricity should be provided. Vessels docking with high air pollution should be banned. The same point applies at: **SI16 Waterways – use and enjoyment** and **SI17 Protecting London's waterways** at E. and 9.17.3.

User: Cemex UK Ltd

Draft Policy SI15, Water Transport, and Supporting Text

Policy SI15 and the supporting text, which will replace Policy 7.26 of the Adopted London Plan, is broadly welcomed but would benefit from further clarification and amendment particularly to make it consistent with the NPPF and therefore sound. It is confirmed that we concur with many of the PLA's suggested amendments to this policy, and in line with the PLA's representations, the following amendment to this policy are proposed:

1. C. Development proposals ~~to facilitate an increase in the amount of freight transported by river should be supported~~ that seek to maximise the amount of freight transported by water will be supported.

User: DB Cargo UK Ltd

The Policy states that development proposals to facilitate an increase in the amount of freight transported by river should be supported.

DB Cargo consider that water transport is recognised as one of the most sustainable modes for freight but the Plan does not give specific support for rail freight. A specific policy for support and development of rail freight and associated operations should be formulated.

User:	Cross River Partnership
The River’s potential in terms of freight movements should also be recognised and supported at appropriate points in this draft London Plan.	

User: Tarmac

Tarmac supports policy SI15 Water Transport for the reasons already outlined above. In addition para ‘H’ to this policy should be extended to say...

In this respect proposals within 500m of a safeguarded wharf will need to carry out a safeguarded wharf assessment as a matter of course to demonstrate that proposed developments have been appropriately designed to take account of the location of and activities occurring on the safeguarded wharf. A safeguarded wharf assessment beyond 500m may be necessary depending on individual circumstances including the distance existing noise outputs occur from the safeguarded wharf.

User:	Taylor Wimpey UK

We are supportive of the waterways policy's for London.

User:	Kingston First

Finally, as a river side location. Kingston First supports the continued promotion of the River Thames and other linked watercourses as a strategic route for freight and passenger transport throughout London, as set out in draft Policies SI4, SI5 and SI6. Kingston and the surrounding area already benefit from privately operated passenger river boats, but the route should be promoted more readily as a viable transport link.

User:	London Borough of Camden

Although we welcome the Mayor’s continued support for the use of waterways to move freight, the Council has found it difficult to negotiate the use of Regents Canal to move construction materials in construction management plans secured through legal agreement – even at canal-side sites. We suggest that the policy should be amended to give support for feasibility studies so that decisions not to use waterways for the purposes of freight movement by water-side developments (either through construction or operation) are fully justified.

User:	Siemens

1.3 Healthy Rivers
For London to develop sustainably in needs to take into account not just the streets but the increasing use of the river for transport and freight. Siemens has developed technology that can reduce emissions from vessels

1.3.1 Electric ferries
In collaboration with Fjellstrand, a Norwegian shipyard, Siemens has developed the technology for the world's first electrically-powered car ferry. Diesel engines are replaced with large battery packs that function as an electric propulsion while in motion. The batteries on the ferry are efficiently recharged when dropping off passengers in dock. As a result the Norwegian ship owner has reduced its fuel costs by 60% and significantly has reduced its carbon dioxide emissions. For longer journey's that require a higher capacity, a hybrid solution is more appropriate. In Denmark, for example, this hybrid solution has led to the reduction in the ferry's fuel consumption. This has led to a 15% reduction in carbon emissions. This technology is also applied to passenger ferries in Venice, fishing boats, cruise liners and ships.

User:	Karl Brown

9.15.4 Requirements on sustainable transport for bulk materials would benefit from being framed as relating to the equivalent transport comparison only. (The application for an waste incinerator at Edmonton dismissed approximately a decade's worth of water transport consideration for lorries on the basis their CO2E externalities were merely at the margin compared to that expected to be emitted from the stack. Possibly but nonetheless such desperately bad planning would benefit from formal firewalls being built into the plan.)

User:	Primrose Hill Conservation Area Advisory Committee

SI 15 after para 9.15.9. We request the addition of a new para 9.15.10.

Our proposed amendment – reasoning: to ensure the inclusion of canals, which contribute significantly to local character and distinctiveness, as well as offering sustainability gains.

Our proposed additional text: ‘9.15.10 The opportunity to expand the numbers of safeguarded wharves should be extended to the canal network.’

User:	Cemex UK Ltd

2. D. The Mayor will keep the network of safeguarded wharves under regular review. Until the Safeguarding Direction in respect of a wharf is removed or amended, the Safeguarded Wharf policy and relevant Safeguarding Direction remains in full force. Boroughs should protect existing locations and identify new locations for additional waterborne freight. There may be opportunities to consolidate wharves as part of strategic land use change, in particular, within Opportunity Areas; these will need to ensure that the existing and potential capacity and operability of the safeguarded wharves is retained and where possible expanded.

User:	Cemex UK Ltd
3. E. Safeguarded wharves should only be used for waterborne freight handling use, <u>including associated storage, handling and processing facilities and associated plant and</u> consolidation centres. The redevelopment of safeguarded wharves for other…..	

User:	Cemex UK Ltd

4. F Development proposals which ~~increase~~ maximise the use of Safeguarded Wharves for waterborne freight transport, especially on vacant wharves and wharves which are currently not handling freight by water, will be supported.

User: Cemex UK Ltd

5. G. Development proposals ~~that include the provision of a water freight use on a Safeguarded Wharf, with other land uses above or alongside, will need~~ for other uses on part of a Safeguarded Wharf site must show through the viability testing criteria that the area identified is unviable for waterborne freight handling use. The design of the development must then ~~will~~ ensure that there are no conflicts of use and that the freight-handling capacity of the wharf is not reduced, and that the development does not constrain future flexibility of the Safeguarded Wharf to accommodate different operational requirements now and into the future.

User:	Cemex UK Ltd

6. H. Development proposals adjacent to ~~or~~, opposite or located in close proximity to Safeguarded Wharves (including vacant wharves) should be designed to ~~minimise~~ ensure there are no conflicts of use and disturbance, in line with the Agent of Change principle. Development proposals near to vacant or underutilised safeguarded site should include a noise assessment that assesses a reasonable worst case scenario for the use of the wharf and assumes the wharf is in full operation to its maximum potential.

User: Cemex UK Ltd

8. New supporting para (insert after 9.15.5)

Safeguarded wharves undertake on-site storage, handling, processing and production activities, which include concrete batching , asphalt and other types of plant, in association with the use of the wharf for waterborne freight handling. These activities are generally considered to be critical to the economic viability of both the Safeguarded Wharf itself and also the maximisation of the use of the river for transport.

Development proposals that include these will be encouraged, particularly where their provision on site can reduce the need for unsustainable transport movements or multi-site handling processes.

User:	Cemex UK Ltd

10. With specific reference to the proposed changes at part (H) of policy SI15 and paragraph 9.15.9 it is highlighted that there is strong case to support the setting of a minimum distance from safeguarded wharves within which new noise sensitive development would be expressly required to have regard to the inter-relationship with the wharf. This is a commonly the case in County Mineral Plans outside of London. It is recommended that consideration be given to the potential for this. At minimum the Policy and text should be clear that development in close proximity to the wharf, not just adjacent or opposite, has the potential to prejudice the operation of Wharves and should fall under the remit of this policy.

User: Cemex UK Ltd

9. Paragraph 9.15.9

Many wharves are in Opportunity Areas and/or are increasingly surrounded by different land uses that do not have an industrial or freight purpose. In line with the Agent of Change principle, new development next to ~~or~~, opposite or in close proximity to wharves should utilise the site layout, building orientation, uses and materials to design out potential conflicts. Development proposals near to, opposite or in close proximity to a vacant or underutilised Safeguarded Wharf should include a noise assessment that assesses a reasonable worst case scenario for the use of the wharf and assumes the wharf is in full operation to its maximum potential. Design mitigations could include the provision of fixed shut windows and winter gardens on elevations facing Safeguarded Wharves. Proposals for neighbouring development sites must ensure that appropriate highway access to wharves for commercial vehicles is maintained.

User:	Cemex UK Ltd

10. With specific reference to the proposed changes at part (H) of policy SI15 and paragraph 9.15.9 it is highlighted that there is strong case to support the setting of a minimum distance from safeguarded wharves within which new noise sensitive development would be expressly required to have regard to the inter-relationship with the wharf. This is a commonly the case in County Mineral Plans outside of London. It is recommended that consideration be given to the potential for this. At minimum the Policy and text should be clear that development in close proximity to the wharf, not just adjacent or opposite, has the potential to prejudice the operation of Wharves and should fall under the remit of this policy.

User:	Cemex UK Ltd

11. It is confirmed that we are in agreement with the PLA with regard to their identification that the definition of Safeguarded Wharves at Annex 3 is factually incorrect. To ensure the robustness of proposed policy SI15, Annex 3 must be amended to remove references to the Safeguarded Wharves Review 2017/2018.

User:	East of England Aggregates Working Party

It is noted that **Policy S/10** (Aggregate apportionment and safeguarding) supports an adequate supply of aggregates to support construction in London, seeks to maintain landbanks and safeguard aggregate resources including aggregate recycling facilities. It also seeks to safeguard wharves and /or railhead facilities with existing or potential capacity for aggregate distribution. EEAWP positively supports this policy and also **policy T7** (Freight and Servicing) and **policy S/15** (Water Transport) which also support the safeguarding of wharves and railhead facilities.

User:	Regent's Park Conservation Areas Advisory Committees

SI 15 after para 9.15.9. We request the addition of a new para 9.15.10.

Our proposed amendment – reasoning: to ensure the inclusion of canals, which contribute significantly to local character and distinctiveness, as well as offering sustainability gains.

Our proposed additional text: ‘9.15.10 The opportunity to expand the numbers of safeguarded wharves should be extended to the canal network.’

Policy SI16 Waterways - use and enjoyment

User:	Mr Igor Dyakov

As architect and citizen of Saint-Petersburg Russia, one of most beautiful cities in Europe, which is located on the number of islands, surrounded by canals and rivers, I want to encourage the development of water public and tourist transport as it is appointed in a strategy of spatial development of London. Development of water transport combined with active engagement of former industrial areas with their canals and rivers is to deliver the new kind of water public spaces inside new commercial, residential or mixed-use developments which can present alternatives to traditional public parks and squares. As an example please find attached the concept for this kind of public space for regeneration of Fulham gasholder in London Borough of Hammersmith and Fulham which was proposed by my team in beginning of 2017 or see the link below.

User:	Mr Roger Westron

7. Recreational Use of the River As one of the Mayor’s priorities was citizens’ health. It is therefore surprising to find recreational use of the river buried in Waterways and Transport, and it’s the responsibility of the Deputy Mayor for Transport! This priority is not significantly set out in this London Plan.

User:	London Waterkeeper
Swimming in the Thames need to be added to this section.	

User:	Taylor Wimpey UK

We are supportive of the waterways policy's for London.

User:	Kingston First

Finally, as a river side location. Kingston First supports the continued promotion of the River Thames and other linked watercourses as a strategic route for freight and passenger transport throughout London, as set out in draft Policies SI4, SI5 and SI6. Kingston and the surrounding area already benefit from privately operated passenger river boats, but the route should be promoted more readily as a viable transport link.

User:	London Borough of Camden

The Mayor’s continued commitment to protecting and enhancing waterways and towpaths is supported. These can have beneficial effects on wellbeing of Londoners.

User: Thames Path National Trail

Response from The Thames Path National Trail Manager
Responses to
Policy G4 Local Green and Open Space
Policy SI16 Waterways – Use and Enjoyment
Policy T3 Transport Capacity, Connectivity and Safeguarding

We fully support the recognition and statements the Thames Path has within the Draft London Plan, but would ask that the Thames Path be given its proper title of National Trail. The Thames Path National Trail, including the sections through London is one of only 16 National Trails of Britain. It was created under the National Parks Act 1949, was submitted for approval to the Secretary of State for the Environment in January 1989 before finally opening 1996. The London stretch of the Thames Path starts at Hampton Court and follows the river to the Flood Barrier at Greenwich. For the most part, it runs on both sides of the river but has more river frontage along the South bank.

The Thames Path National Trail can and should provide access for all Londoners (and tourists opportunities) for walking and where possible cycling along a 40-mile route which links a network of green, open spaces as well as, historic buildings and London's World Heritage Sites. There also exists numerous opportunities for circular routes linking and encouraging the public onto and along the Thames Path National Trail. The Thames Path has strong public transport links along its full length through London. The river and its' National Trail is London's' largest open space.

Orval http://leep.exeter.ac.uk/orval/ Estimates the Welfare Value of the Thames Path National Trail passing through London to be £40,466,939 with an estimated number of domestic day visits of 9,795,287

London's National Trail can and should provide many opportunities to help and support the Majors Office in delivering its interconnecting green transport, walking health and wellbeing agenda as well as providing significant contributions to London's economy by supporting numerous riverside trail businesses, such as London's historic riverside pubs. Safe guarding public assess along the National Trail is crucial, and where development allows, to designate (a Public Right of Way) for Public Access along the Capitals' river, where currently the trail is forced inland. The most common complaints or queries along the Thames Path through London is locked gates and signage issues. With support, these issues can be addressed.

There are many opportunities to improve access for all, through London and to ensure the route meets National Trail quality standards. This includes support and buy in for the installation of National Trail designated signage, the Acorn. A fully signed National Trail helps, inform and encourage Londoners to walk and explore their National Trail without fear of trespass or intimidation along the Capital’s river. The easier and more accessible the Thames Path National Trail is through London, the more likely it is to encourage first time users, and groups who would not necessarily think about walking as part of their commute, part of their health and wellbeing agenda or just recreation walking.

Policy SI17 Protecting London's waterways

User:	Miss. Emma Smith

London's canals are a crucial 'green space' for millions of Londoners and visitors and are well used. However they have come under attack from greedy developers looking to erect tall buildings which are out of context to their environment, often destroying public access to the water. Recent planning applications along stretches of the Regents Canal, which although sometimes rejected, have sought to build buildings that are way too tall creating a canyon effect along the canal; destroying the historical context; significantly reducing the daylight to the canal and to residents adjacent and on the opposite side of the water; and significantly increasing the light pollution over the canal harming the wildlife and neighbouring residents. The London Plan should consider and respect these issues accordingly. The Mayor should not support developments which harm the canal in this way (which has not always been the case to date eg Regents Wharf in Islington)

User:	Mr David Williams

It is imperative to provide electric hookups for boats mooring in the London area to protect the long tradition of boating on the canals ànd waterways. Currently there are hardly any points for the increasing boating population

User: Mrs Hilary Pereira

There needs to be even greater caveats about development proposals for the Thames needing to be river-related. Any ancillary development has to be really exceptional and itself relate to the river and also provide public access, eg the example of a cafe on a passenger pier for the use of waiting passengers. In particular, residential development on/over the river should never be non-floating. Nor should houseboats be seen as the enabling development for other infrastructure, unless there is clear and ongoing public gain, with residential boats very clearly seen as ancillary not the other way round.

The situation may be different in canal basins and especially in the docks.

User: Mrs Hilary Pereira

The River Thames Society endorses the PLA Air Quality Strategy to reduce harmful emissions to air from marine sources within the tidal Thames and considers that the London Plan should make specific reference to this, with support for the PLA's strategy.

It was unclear if the provision of power was expected to extend to midstream moorings, including for small leisure vessels, but there are many practical problems with this.

Whilst most houseboats have mains supplies, and so do not need to burn noxious material for generating electricity, they may well burn smoky fuel for heating. Local authorities should be encouraged, together with the PLA and CRT, to use existing powers to negate the impact of the exemption boats have to the Clean Air Act 1993 s44, at least when houseboats are static at a home mooring. For new residential moorings, non-generation of harmful emissions can be made a condition of planning approval.

There is also concern about pollution of the water from discharges of black water, and there needs to be facilities for this to be discharged ashore from smaller vessels as well as from the big commercial ships

User: Ms Hilary Norris

Sl17 B The open character of the canal should not be compromised by the proliferation of glass towe blocks destroying the ambience of the environment.

Sl 17 C-E Residential moorings should be sited away from residential housing to restrict possible friction between stakeholders.

9.17.2 Please add the words.. *'nor the peace, tranquility and well being of those living in residential properties alongside the canal'.* Cafes and restaurants should **never** be sited where they could disturb permanent residents.

9.17.3 Please add the words...*'the discharge of human waste into the canal'*

User:	Mr Chris Gannaway
Strongly support this policy	

User: mr xharles manson

Development proposals canalside tend to be over-high, dominating a precious open-air asset and amenity.

A restriction or guidleine on canalside development should be specified to prevent darkening and over-domination of Towpaths open to public.

Heritage warehouses shold be particularly protected.

Canalside restaurants and cafes shold be particularly aware that noise carries very easily and for long distances across water.

User:	mr xharles manson
Canalside restaurants and cafes shold be particularly aware that noise carries very easily and for long distances across water.	

User:	mr xharles manson
Canalside heritage warehouses should be particularly protected where possible.	

User: No Third Runway Coalition

The propsal to expand Heathrow will impact waterways in the surrounding areas yet the exact details and impact remain unknown.

The Environment Agency (EA) has not yet made a detailed assessment of the effect of proposals to expand Heathrow Airport on waterways. Further, they will not be able to undertake such an assessment until HAL submit their application for a Development Consent Order, which is expected by the end of 2019.

Such uncertainty risks undermining efforts by the Mayor to protect London's waterways and is indicative of Heathrow's approach to the impact of airport operations on local communities.

User:	Thames Estuary Partnership

Protecting London's waterways should include reference to the need for adequate waste disposal infrastructure e.g. general waste and recycling bins and interpretation to stop the flow of litter into the waterways, the Thames and thus the ocean.

User:	Putney Society

9.17.1. River Restoration. We enthusiastically support the enhancement of the biodiversity, water quality and amenity value of the river. We appreciate what has already been done but realise there is much still to do. We have been working along with Justine Greening our MP to support and monitor the plans for the Thames Tideway Tunnel at their sites at Barn Elms and Putney Bridge.We have concerns about the increase in the amount of plastic waste entering the river either directly or via sewage outflow. Thames 21 are currently monitoring this through their Riverwatch programme.

User:	Putney Society

9.17.2. Development into Waterways (See 9.16.2 above). We are also very concerned about encroachment into the river. Policy 7.28 page 245 of the London Plan 2011 states “Planning proposals should restore and enhance the Blue Ribbon Network by … preventing development and structures into the water space unless it serves a water related purpose”. A particularly blatant example of encroachment into the river is provided by the plans for the new Fulham Football Club which include extending the stands 8m out over the river. There is no excuse for allowing this. There is no mention of The Blue Ribbon Network. Has it been abandoned?

User:	Kew Society
Paragraph 9.17.2 should also refer to the need to protect open vistas along rivers from buildings that protrude out over the river. We therefore suggest the wording **“development into waterways” should be amended to read “development into and over waterways”.**	

User:	Kew Society
Paragraph 9.17.3 should be strengthened to prevent discharge from vessels.	

User: London Borough of Islington

Draft London Plan Policy

Policy SI17 – Protecting London’s waterways

Islington Response

All proposals for new mooring facilities should explicitly prioritise non-diesel vessels.

We note policy SI17(E) which requires on-shore power facilities. This is supported as it means standing vessels have access to power without switching their engines on.

User: Port of London Authority

Part C of policy SI17 should be expanded to include some of the text included in paragraph 9.17.2, specifically referring to the need for Development Proposals to ensure that navigation, river regime, biodiversity and the character and use of waterways are not compromised. The PLA considers that this wording must be included in the policy itself, with the five specific caveats mentioned above. The PLA

recommend the following amendments to the Draft Plan:

Suggested amendments to SI17 part C:

"Development proposals into the waterways, including permanently moored vessels and development into the waterways should generally only be supported for water-related uses, ***and must address any potential navigation, river regime, biodiversity issues and ensure that the character and use of the waterways are not compromised"***

Suggested amendments to reasoned justification at paragraph 9.17.2:

"Generally, permanently-moored vessels and development into waterways should only be permitted for water-related uses. However, uses such as bars and restaurants (for example ancillary to a passenger pier), and improved access to or along waterways and related public realm, can add to the diversity, vibrancy and regeneration of waterways, in particular in basins or docks. Any such Development Proposals must demonstrate that they do not compromise ~~the specific siting of such facilities requires careful consideration so that~~ navigation, river regime, biodiversity and the character and use of waterways. ~~Are not compromised.~~"

User: Port of London Authority

The PLA in principle supports the reference in the policy to providing on-shore power at water transport facilities at wharves and residential moorings to help reduce air pollution however; the PLA considers the mandating of the installation of onshore power should be avoided. The requirement to install shore side power could prohibit the provision of new water transport facilities, including the reactivation of Safeguarded Wharves due to the cost associated with the provision of shore-side power, forcing freight back onto roads and potentially resulting in no new piers and moorings. Also, some inland sites do not have a vessel on site for long enough periods to use it. Even without shore power, waterborne freight is an environmentally beneficial mode of transport and it would be counter productive if the requirement for shore side power made it impossible for waterborne transport to deliver its environmental benefits for London.

The PLA's draft Air Quality Strategy includes proposals to encourage the installation of green technology including shore power through the river works licensing regime and to undertake a detailed feasibility into the potential of installing shore-side power at a site in London.

In addition, it is noted in paragraph 9.17.3 that a pollution baseline is mentioned. The PLA believes that this is referring to the London Atmospheric Emissions Inventory (LAEI) mentioned in paragraph 9.1.7. This should be made clearer in the policy wording.

The PLA therefore recommend the following amendments to Draft Plan policy SI17 and the associated reasoned justification:

Suggested amendments to SI17 part E:

"*On-shore power at water transport facilities should be* ***considered*** ~~*provided*~~ *at wharves and residential moorings to help reduce air pollution".*

Suggested amendments to reasoned justification at paragraph 9.17.3:

"*Pollution from vessels should be minimised in terms of emissions from vessels and related land-side infrastructure. A baseline* ***using the LAEI is*** *being established jointly with key stakeholders including Transport for London and the PLA, along with appropriate measures and investment to minimise impact. This includes the requirement in this policy to* ***consider*** ~~*provide*~~ *on-shore power at wharves and moorings."*

User:	Marine Management Organisation (MMO) HM Government

In reviewing Policy SI17 Protecting London's waterways, in particular section E, we raise your attention to the UK marine policy statement, which is the framework for taking decisions affecting the marine environment, and the following section on Air Quality (2.6.2 page 22).

"2.6.2.1 Activities and developments in the marine and coastal area can have adverse effects on air quality at various stages. The construction, operation and decommissioning phases of projects can involve emissions to air which could lead to adverse impacts on human health, biodiversity, or on the wider environment. Other key sources that impact air quality include emissions from shipping, oil and gas platforms at sea, oil and gas importing facilities, vehicle emissions as a result of increased coastal activity, and dust from construction. The generation of energy from renewable sources has an overall beneficial effect on air quality, as compared with fossil fuels.

2.6.2.2 When developing Marine Plans, marine plan authorities should be satisfied that air quality impacts have been taken into account. They should also liaise with terrestrial authorities to consider how air quality may be improved, particularly within, or adjacent to, Air Quality Management Areas (AQMAs). In all cases, the marine plan authority should take account of any relevant statutory air quality limits."

User: Marine Management Organisation (MMO) HM Government

The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing European grants.

Marine Licensing

Activities taking place below the mean high water mark may require a marine licence in accordance with the Marine and Coastal Access Act (MCAA) 2009. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in England and parts of Wales. The MMO is also the authority responsible for processing and determining harbour orders in England, and for some ports in Wales, and for granting consent under various local Acts and orders regarding harbours. A wildlife licence is also required for activities that that would affect a UK or European protected marine species.

Marine Planning

As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas. The MMO is currently in the process of developing marine plans for the remaining 7 marine plan areas by 2021, including the South East Marine Plan.

Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. For marine and coastal areas where a marine plan is not currently in place, we advise local authorities to refer to the Marine Policy Statement for guidance on any planning activity that includes a section of coastline or tidal river. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act and the UK Marine Policy Statement unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our online guidance and the Planning Advisory Service soundness self-assessment checklist.

Minerals and waste plans and local aggregate assessments

- If you are consulting on a mineral/waste plan or local aggregate assessment, the MMO recommend reference to marine aggregates is included and reference to be made to the documents below:
- The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK) construction industry.
- The National Planning Policy Framework (NPPF) which sets out policies for national (England) construction minerals supply.
- The Managed Aggregate Supply System (MASS) which includes specific references to the role of marine aggregates in the wider portfolio of supply.
- The National and regional guidelines for aggregates provision in England 2005-2020 predict likely aggregate demand over this period including marine supply.

The NPPF informed MASS guidance requires local mineral planning authorities to prepare Local Aggregate Assessments, these assessments have to consider the opportunities and constraints of all mineral supplies into their planning regions – including marine. This means that even land-locked counties, may have to consider the role that marine sourced supplies (delivered by rail or river) play – particularly where land based resources are becoming increasingly constrained.

User: London Assembly Labour Group

Suggested changes

A new section A in SI15 to read “Development proposal should protect and enhance the open nature, habitats and heritage of London’s waterways (policy SI17) as well as enhancing their use for transport.”

Justification for policy recommendations

The separation of waterways as transport, and waterways as sites of biodiversity and historical merit in the text may have the effect of dividing these purposes when considered by developers or planning committees.
A new section A in SI15 that makes it refer explicitly to SI17 seems to be the easiest way to clarify that they are both applicable to all development covered in SI15. Something along the lines of:

A Development proposal should protect and enhance the open nature, habitats and heritage of London’s waterways (policy SI17) as well as enhancing their use for transport.

It has also been noted that in May 2017, the London Waterways Commission was merged with the River Concordat to form a single transport and environment group, the Thames and London Waterways Forum: https://www.london.gov.uk/decisions/md2116-thames-and-london-waterways-forum

The Forum is led by a steering group, chaired by the Deputy Mayor of London for Transport, and the focus does seem much more on transport and other uses (recreation etc.) rather than environmental. This is an unwelcome step and the Forum should place greater emphasis on London’s waterways as environmental assets and habitats.

User:	London Borough of Haringey
The Council supports this policy.	

User:	London Borough of Brent
The Council supports this policy.	

User:	London Borough of Bromley

The policies are broadly supported. The Council have committed, in the Draft Local Plan, to take opportunities for improving the river channels in the borough, particularly the River Cray, through any development that may occur.

User:	London Borough of Tower Hamlets

Waterways should be protected however there should also be a policy that recognises that this protection should not impede the construction of other strategic infrastructure crossing waterways.

Given the borough has a significant amount of waterfrontage and high levels of development, a strengthening of planning policy protecting the character, openness and appearance of waterways from inappropriate development is welcomed.

The policy should also be amended to include that developments should enhance the water environment, including biodiversity.

User: Environment Agency

We welcome Policy SI17, particularly Point A, that development proposals that facilitate river restoration, opening culverts and naturalising river channels etc. should be supported, and those that impound and constrain waterways should be refused. This will have multiple benefits. Nonetheless, we recommend strengthening this policy to support opportunities to:

- Improve water quality, thus meeting Thames River Basin Management objectives, and
- Enable net gain for riparian and terrestrial habit gains in and associated with river corridors, and buffer zones.
- De-culvert rivers, and restore them to a more natural state.

In Point A, the term' if appropriate', weakens the policy, and is not present in Policies SI15 and SI16. Consequently there is a potential policy bias towards use and enjoyment, and on water transport over river restoration. There are unlikely to be circumstances where it would be inappropriate to consider the matters listed.

Clarity in explanatory text is required around the term 'constrain' waterways used in Point A. If the meaning is, replacing natural banks with concrete, then we encourage a reversal of this trend, through the setting back flood defences and reinforcements, leaving room for water. We suggest that that could be set out in the explanatory text, which would also support Policy SI12.

We consider that Policy SI17 should support and cross reference to the river catchment approach, and it's potential to support growth. This helps support: Policy SI5, and its objective to protect and improve water quality in line with the Thames River Basin Management Plan, and Catchment Plans; Policy SI12, and its objectives for riverside strategies; and to the objectives of Policy SI14, and the strategic role of waterways. Further the policy, aiming to facilitate river restoration, has a role in implementing the objectives of policies in Chapter 8, notably regarding Policy G4, (Local green and open space), Policy G5 (Urban greening), and Policy G6 (Biodiversity and access to nature) .

In support of a river catchment approach, we strongly suggest that the explanatory text highlights London's other river corridors, such as for the rivers Crane, Lea, Wandle, Ravensbourne and Brent. To help raise the profile of the capital's wider river network, we suggest a river network map is included in the Plan.

Recommendation:

Please strengthen policy, Point A:

- Alter 1st sentence to read:'…protect the foreshore, **increase heritage value, protect and improve riparian and terrestrial habit, and improve water quality** should be supported.', and delete '…where appropriate…' from the end of this 1st sentence. There are unlikely to be circumstances where it would be inappropriate to consider these matters.
- Add a sentence to the end of point A, related to culverting to read:' **Where culverting is required, development proposals should demonstrate that there is no net increase in** impoundment of the waterway on site.'
- Define, and clarify in explanatory text the meaning of 'constrain' waterways in Point A, 2nd sentence.

- Amend point E. As on-shore power is not always practical at all sites we suggest amending the text to read: 'On-shore power at water transport facilities should be provided **where possible** at wharves and residential moorings to help reduce air pollution'.
- Add a policy point, requiring boroughs, in preparing development plans, to identify any parts of the river network where river restoration, including biodiversity improvements, will be sought

We also recommend:

- Review the policy against the current London Plan's range of 'Blue Ribbon Network' policies, notably Policy 7.28 and text, which we consider is stronger in terms of delivering action on restoring and protecting the river network.
- Add to explanatory text to identify the role of Policy SI17 in implementing policies elsewhere in Chapters 8 and 9.
- We recommend the addition of a map in the Plan, identifying London's river network, to add clarity to the Policy, and provide a higher profile to rivers other than the Thames.

User: Environment Agency

We welcome Policy SI17, particularly Point A, that development proposals that facilitate river restoration, opening culverts and naturalising river channels etc. should be supported, and those that impound and constrain waterways should be refused. This will have multiple benefits. Nonetheless, we recommend strengthening this policy to support opportunities to:

- Improve water quality, thus meeting Thames River Basin Management objectives, and
- Enable net gain for riparian and terrestrial habit gains in and associated with river corridors, and buffer zones.
- De-culvert rivers, and restore them to a more natural state.

In Point A, the term' if appropriate', weakens the policy, and is not present in Policies SI15 and SI16. Consequently there is a potential policy bias towards use and enjoyment, and on water transport over river restoration. There are unlikely to be circumstances where it would be inappropriate to consider the matters listed.

Clarity in explanatory text is required around the term 'constrain' waterways used in Point A. If the meaning is, replacing natural banks with concrete, then we encourage a reversal of this trend, through the setting back flood defences and reinforcements, leaving room for water. We suggest that that could be set out in the explanatory text, which would also support Policy SI12.

Recommendation:

Please strengthen policy, Point A:

- Alter 1st sentence to read:'…protect the foreshore, **increase heritage value, protect and improve riparian and terrestrial habit, and improve water quality** should be supported.', and delete '…where appropriate…' from the end of this 1st sentence. There are unlikely to be circumstances where it would be inappropriate to consider these matters.
- Add a sentence to the end of point A, related to culverting to read:' **Where culverting is required, development proposals should demonstrate that there is no net increase in** impoundment of the waterway on site.'
- Define, and clarify in explanatory text the meaning of 'constrain' waterways in Point A, 2nd sentence.

User:	Environment Agency

Amend point E. As on-shore power is not always practical at all sites we suggest amending the text to read: ‘On-shore power at water transport facilities should be provided **where possible** at wharves and residential moorings to help reduce air pollution’.

User:	Royal Borough of Kingston
Generally support. It is considered that a single policy would have reduced repetition. RBK would welcome guidance on how to assess the ‘need’ for water sport centres.	

User:	London Borough of Hounslow
LB Hounslow supports this policy	

User:	London Borough of Redbridge

The Council supports this policy as the main River Roding is somewhat under-appreciated, in no small part because of how it relates spatially to the A406 and M11 running alongside or above it. It believes that waterways can be a suitable magnet for investment and development, whilst also offering access to nature. The River Roding runs very close to Ilford town centre but currently has a low profile and is relatively inaccessible. Through the Ilford Delivery Prospectus the Council will encourage new development in certain areas to respond to the river and provide access to it.

User:	London Borough of Richmond Upon Thames

River Thames runs for 34 km through the Borough. This borough is the only 1 in London that is intersected by the Thames, giving long river recreational areas, and a unique and historic landscape character.

User:	London Borough of Havering
Havering supports the policy.	

User:	London Borough of Harrow
The Council supports this policy.	

User:	Royal Borough of Greenwich

This policy has overlaps with both SI14 and SI16, and it would seem sensible to combine these three policies insofar as possible for consistency and cohesion.

User:	Royal Borough of Greenwich
River restoration is also a good way to manage flood risk and should be mentioned.	

User:	London Borough of Enfield

Policy SI17 ‘Protecting London’s waterways’ needs to refer to future guidance regarding waterside related development. Planners need to know how and where development could negatively impact waterways. The mayor should clarify how planners should determine whether development proposals alongside the canal network and other water spaces respect local character and environment and contribute to their accessibility and active water-related uses in line with new guidance.

User: Just Space

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

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

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

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

Monitoring

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

Reference to the draft London Environmental Strategy (LES) is not particularly helpful as the draft LES IIA (7.2.1.3) promises that a framework will emerge post adoption of LES. Evaluation and monitoring, consequently, will be problematical without further targets and milestones relevant to the Sustainable Infrastructure Policies of the Plan. Reviewing the progress of the Plan and LES is not only an issue for compliance with the Strategic Environmental Assessment Regulations but one of wider democratic accountability whereby Londoners can participate in the process, enabled by ready and easy access to information. And on this point, Just Space asks that in addition to the (quantitative) indicators, which could usefully include measuring changes in public/business opinion, awareness etc., that there be qualitative assessments undertaken by community and environmental groups. There is an important role for communities in monitoring, safeguarding and enhancing the environment.

Indicators:

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

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

*"C. Environment: Carbon emissions in relation to the minimum limit set to avoid dangerous climate change (using Defra data); similarly for air quality.

I. Sustainability of resource use (for example capacity of renewable energy equipment installed; amount of waste generated that is not recycled).

J. Environmentally-damaging travel and transport generated by economic activity (for example number, distance and cost of work-trips, deliveries, air-travel)."

User:	London Borough of Bexley

Policy SI17 Protecting London’s waterways only makes passing reference to the biodiversity value of waterways; additional detail in the policy and in the supporting text should provide information on how biodiversity should be protected and improved.

User: The Regents Network

Para A to E – This policy gets full approval, and is to be welcomed for being so positive and proactive, and with consideration for the waterways and their long term future. The key points may be summarised as:

- Protect and celebrate waterways ‘for themselves’
- Protect the distinct open character
- Respect their local character and environment
- Enhance local distinctiveness
- River restoration to enhance their biodiversity, water quality and biodiversity
- Vessels should preferably be moored off-line, and only supported for water-related use.

It would be appropriate to add to the list the strong objection to floating football pitches, swimming pools, cycleways and even the previous Mayor’s floating village in the Royal Docks, with a:

- ‘No’ to floating structures

as they would not only be land-based uses, but a serious loss of open water space. It is welcome that the boardwalk cycle route along the waterfront at Kingston has now been scrapped (and over £10m saved). An exception may be made for the occasional converted craft as a floating bar or restaurant, including the very long established and attractive Chinese Restaurant at Cumberland Basin on the Regents Canal at Camden Town.

User: The Regents Network

London’s remaining dock areas Para 9.17.4

Two lines of text on the protection and promotion of the remaining London Docks tagged on to the end of the waterways section in the Draft London Plan is totally inadequate. These ‘final words’
exemplify the general disinterested attitude to London’s waterways from the Mayor and GLA, and which is reflected in the reduced waterways section in the Draft London Plan.

Some of the former London Docks which have not been filled in have been put to good use as marinas, except for the extensive Royal Docks which seem to have been relegated as the setting for
acres of property development with only limited use of the huge expanses of water for sport or water activity. The opportunity for marina facilities, extensive boatyards and boat building, and the
urgent provision of maritime training and tuition has been delayed and postponed year after year, and it is not certain whether these key facilities will ever be provided by GLA on the publicly
owned land which is being handed over for property development.

Re-drafting and re-think

The waterways must be sensibly defined and established as a key participant of London’s life and economy, and the opening of the waterways section in the Draft London Plan needs to be re-thought
and completely re-drafted. Just a bit of editing will not be acceptable. The rest of the reduceddown text needs serious thought and attention, and as the word count is so low there is opportunity
to bring it up to standard and give the waterways the importance and credit that they deserve.

A conclusion

The Mayor must raise the profile of London’s waterways in the London Plan and Strategies. Our waterways must be given respect, and be solidly protected, and given an active and strategic future,
and above all the Blue Ribbon Network principles and policies must be reinstated forevermore.

User:	Redington Frognal Neighbourhood Forum

Chapter 9 Sustainable infrastructure

SI17 A “We welcome the emphasis on river restoration.”

User:	Association of Local Government Archaeological Officers (ALGAO)
Welcome recognition of the heritage value of waterways. Canals, docks and the like are an important part of London’s industrial heritage.	

User: Canal & River Trust

Point B:

We question what is meant by ‘distinct open character’ in part B of policy SI17. If openness is intended to mean that large expanses of water are clear of any moored boats or floating infrastructure, then many parts of the Trust’s waterways in London do not meet this description. Significant lengths of these waterways are instead characterised by a strong sense of enclosure, with man-made engineering structures, buildings rising sheer out of the water and a concentration of boats. We suggest that aiming to protect such a definition of openness would be contrary to the heritage and current functional uses of waterways. It would be contrary to the best interests of towpath users, who benefit from the natural surveillance provided by active uses of the waterway. It would also be contrary to policy SI16 which seeks to support new uses of the water. The result is a policy position that is not justified because it does not represent the most appropriate strategy and one lacking in clarity for decision makers, meaning that it does not meet the requirements of paras 154 and 182 of the NPPF. We suggest that part B of policy SI17 should be amended as follows:

B Development proposals should support and improve the protection of the distinct open character and heritage of waterways.

Point C:

A wide range of uses take place on London’s waterways and have historically done so, including passenger and freight transport, recreation, residential uses, trip boats and floating shops, cafes, bars and restaurants. The mix of uses makes an important contribution to the character and vibrancy of London’s waterways. It also helps to create places that are used 24 hours a day, bringing better passive surveillance to the waterways and their towpaths / riverside paths. As a result, we suggest that an appropriate definition of ‘water related uses’ should be ‘uses that take place on boats capable of navigation or infrastructure that supports such uses’. Sufficient controls on such uses exist elsewhere in the waterway policies and throughout the plan, such as the protection of navigation in policy SI16 and character and environment in policy SI17.

Notwithstanding our previous comments that bars and restaurants should be considered water related uses where they take place on boats capable of navigation, we welcome the support for proposals that enhance the diversity, vibrancy and regeneration of waterways, particularly basins and docks, in paragraph 9.17.2. We also welcome the aim of protecting and promoting the vitality, attractiveness and historical interest of London's remaining dock areas. Currently, we consider that the chronic lack of activity in sections of the West India and Millwall Dock systems does nothing to evoke their history as places alive with uses on land and water. It also does not come close to delivering the potential that the docks have to support the sustainable development of the area. We suggest that a city like London, whose heritage is so closely linked to its waterways, should be aiming to be a world leader in how blue infrastructure contributes to a wide range of sustainable development objectives.

The support for schemes that enhance the vibrancy and vitality of waterways, particularly docks and basins, is the subject of two of the four supporting paragraphs to policy SI17 and yet it is not reflected at all in the policy itself. We suggest the policy, therefore, is not justified because it does not reflect the most appropriate strategy, which is detailed in the supporting text. We suggest that part C of policy SI17 should be redrafted as follows:

C Development proposals into the waterways, including permanently moored vessels and development into the waterways, should generally only be supported for water-related uses, unless they support the diversity, vibrancy and regeneration of waterways, in particular basins or docks.

As suggested above, sufficient controls on such uses exist elsewhere in the waterway policies and throughout the plan, such as the protection of navigation in policy SI16 and character and environment in policy SI17. The fact that the vast majority of the Trust's waterways in London are in our ownership, with certain additional controls applied by Defra, offers further protection.

Point D:

We support much of point D of policy SI17. However, we suggest that the policy should also seek to protect the structural integrity and stability of the waterway corridor where new development occurs in or alongside them. The NPPF requires that the planning system prevents both new and existing development from contributing to or being put at unacceptable risk from land instability (para 109). In certain areas of London, large pounds of water are held in place by infrastructure that would be very sensitive to inappropriate development adjacent to it.

We also suggest that development plans should do more than identify opportunities for increasing local distinctiveness, as is currently required by point D. The scale of regeneration proposed along the Trust's waterways and the range of benefits that they can bring, we believe, warrants more detailed consideration in development plans. We suggest that the following would more fully meet the expectations of planning policy set out in para 114 of the NPPF, which requires local planning authorities to plan 'positively for the creation, protection, enhancement and management' of green infrastructure.

D Development proposals along London's canal network, docks, other rivers and water space (such as reservoirs, lakes and ponds) should respect their local character and environment, protect their structural integrity and stability and should contribute to their accessibility and active water-related uses. Development Plans should incorporate policies and identify opportunities to protect and enhance waterways as important environmental, social and economic resources, key parts of the local public realm, strategic sustainable transport routes, green/blue infrastructure and important contributors to ~~for increasing~~ local distinctiveness.

In addition, we suggest that the policy should be renamed as follows:

Protecting and enhancing London's waterways

And that the following paragraph is included as the first paragraph of supporting text to policy SI17:

London's waterways provide a strong sense of place and connection in their own right and to the places that have grown up around them. The amount of new development planned alongside them, including in Opportunity Areas and Housing Zones, means that they have an important role to play in the place-making of new neighbourhoods across the city. High quality design, in accordance with the design and National Park City policies of the London Plan, particularly D7 Public Realm, and investment through CIL / planning obligations should be pursued to deliver highly-liveable, inclusive and well connected waterway places. Planning for new on-water uses in appropriate locations will help to ensure that active, world-class waterways deliver new opportunities for living, working and socialising, increasing choice and inclusivity and supporting economic growth. Development plans should also seek to maximise the role that waterways can play in London's green future by regarding them as a local heat source (consistent with policy SI3), a source of urban cooling, a source of potable and non-potable water (consistent with policy SI5) and part of sustainable drainage networks (consistent with policy SI13)

Point E:

Where the Trust is installing new residential moorings in London, we are providing an on-shore power connection. Many other types of moorings are frequently treated as not requiring planning permission and, as such, this section of policy SI17 would not apply. We suggest that it is right that the policy only applies to residential moorings. However, the Trust wish to make it known that recent new permanent non-residential moorings installed by the Trust in London also benefit from shore power connections.

We have suggested in our response to the Draft London Environment Strategy (Appendix C) that, in the interests of fairness and consistent with the City for All Londoners vision, strategies to tackle domestic emissions from boats should be much more closely aligned with those for 'bricks and mortar' housing. This should include offering the same support and financial incentives as the Energy for Londoners programme and boiler scrappage schemes. As such, we welcome the statement in para 9.17.3 that appropriate measures and investment to minimise impact are being established.

The Trust is beginning discussions with the British Marine Federation about how we can work with boat and solid fuel stove manufacturers to ensure that a new generation of inland waterway boat engines and boat stoves incorporate improved environmental standards. We have suggested that the Government's proposed technology fund could be made available to the Trust and the marine sector to research and test innovations. We question whether point E of the policy is actually required, given that all development would be required to meet an air quality neutral standard under policy SI1. However, if it is deemed necessary then we suggest that point E should provide greater flexibility to allow for a situation in which low-emission energy generation on boats or mooring infrastructure negates the need for on-shore power, which may ultimately be provided by less sustainable sources. In addition, we are not clear what the reference to 'water transport facilities' adds to the policy. We suggest that the following would represent a more appropriate strategy:

E On-shore power ~~at water transport facilities~~ should be provided at wharves and residential moorings to help reduce air pollution, unless they are to be used by boats able to meet their energy needs from low-emission technology.

Definition of Water Space

The London Plan does not include a definition of waterways, which is the term most commonly used in policies SI4 to SI17. However, it does include a definition of water space:

Area covered by water (permanently or intermittently), not adjacent land that is normally dry, and including the River Thames, other rivers and canals, and reservoirs, lakes and ponds.

We suggest that this definition fails to realise that for London's canal network the water space and its towpath are intrinsically linked and that this relationship is essential to the waterways' functions, heritage and character.

We would be concerned if this definition were to be applied to 'waterways', as it would negate the need for new development proposals to support and improve the protection of the character and heritage of canal towpaths in policy SI17 B (as amended). It would also remove the requirement to explore opportunities for new, extended, improved and inclusive access infrastructure on to towpaths. We suggest that in both of these examples, such an approach would not be the most appropriate strategy for the sustainable development of London.

User: London Wildlife Trust

We welcome and support Policy S17: we recommend that it makes sense to placed before policies SI15 and SI16.

We recommend a minor amendments to Part A:

A Development proposals that facilitate river restoration, including opportunities to open culverts, naturalise river channels, protect the foreshore and floodplain, protect and improve riparian and adjacent terrestrial habitats, and improve water quality and increase the heritage ~~and habitats~~ value, should be supported ~~if appropriate~~. Development proposals to impound and constrain waterways should be refused.

and to Part D:

D Development proposals along London's canal network, docks, other rivers and water space (such as reservoirs, lakes and ponds) should respect their local character, ~~and~~ environment and biodiversity, and should contribute to their accessibility and active water-related uses. Development Plans should identify opportunities for increasing local distinctiveness.

We also recommend the policy is reviewed against the current London Plan's range of 'Blue Ribbon Network' policies, notably Policy 7.28 and text, which we consider is stronger in terms of delivering action on restoring and protecting London's waterways network.

User: West London River Group

We suggest the following amendment. Generally, permanently?moored vessels and development and **structures** into the **water space** should only be permitted for water related uses.

The River Thames should not be used as an extension of developable land in London, nor should parts of the river be a continuous line of moored craft over which local authorities have little planning control in relation to height, and other factors.

We note that Hammersmith & Fulham Council on the 28th February, 2018 adopted a Supplementary Planning Document, which included a section, page 251, on Residential Moorings. The Mayor should require boroughs to produce similar plans appropriate to their locations.

User:	London Borough of Newham

Policy SI17: Protecting London's waterways

LBN are generally supportive of the policy which is complementary to Newham's Draft Revised Local Plan. However, Paragraph D should also recognise the need for crossings to improve connectivity across water surfaces.

User:	Berwin Leighton Paisner LLP

Development proposals into the waterways, including permanently moored vessels and development into the waterways should generally only be supported for water-related uses or to support and complement enhancement of water-related purposes.

User: Berwin Leighton Paisner LLP

Generally, permanently-moored vessels and development into waterways should only be permitted for water-related uses. However, uses such as bars and restaurants (for example ancillary to a passenger pier), or in certain cases other; commercial use, for example leisure retail uses if compatible with the wider location and integrated with the waterways related and improved access to or along waterways and related public realm, can add to the diversity, vibrancy and regeneration of waterways, in particular in basins or docks or pier locations with high levels of accessibility and wider amenities . The specific siting of such facilities requires careful consideration so that navigation, hydrology, biodiversity and the character and use of waterways are not compromised" (paragraph 9.17.2).

User: BAE Systems

Water transport and protecting our waterways (Policy SI15 / Policy SI17)

We are supportive of proposals to increase the use the Thames for development related freight traffic. However, this policy risks simply shifting emissions from road transport to the river.

To mitigate this, emission reduction technologies should be considered, including stricter engine standards for the river and hybridisation. Furthermore, this should be looked at in conjunction with the Port of London's new Air Quality Plan.

The technology exists to support such changes today. We would welcome the opportunity to work with the Mayor and his team to make this a reality.

User: Natural England

London’s waterways contain within them a significant amount of priority habitat, and are vital for ensuring the ecological integrity of a number of designated sites. Furthermore, the Thames recommended Marine Conservation Zone (rMCZ) is currently under consideration and may be designated in the near future. In addition to our comments on policy G7 recommending a new policy relating to river protection and restoration, we consider that this policy should provide greater clarity regarding the value, protection and enhancement of London’s waterways.

Whilst we support measures to refuse development proposals to impound or constrain waterways, we consider that this policy should emphasize the role for Boroughs in providing a strong policy direction to protect and enhance the biodiversity value of waterways within their development plans. Therefore we **recommend** that this policy incorporates the following text: *‘Boroughs should plan positively for the protection and enhancement of biodiversity associated with waterways, working across administrative boundaries at the catchment scale as far as possible. Boroughs should identify parts of the river network where river restoration, including biodiversity improvements, will be sought’.*

As per the Environment Agency’s response, we also **recommend** that this policy is strengthened to support opportunities to:

- Improve water quality, thus meeting Thames River Basin Management objectives,
- De-culvert rivers, and restore them to a more natural state.

User:	Historic England
We welcome the recognition of the heritage value of London’s waterways in this policy.	

User:	Mr Roger Westron

4. Residential Boats Policy SI17 Protecting London’s Waterway’s Again supported but it does not go far enough. Add to 9.17.2 The river should not be used as an extension of the developable land in London, nor should parts of the river be a continuous line of moored craft. It is to be noted that Hammersmith & Fulham Council 28 February 2018 adopted a Supplementary Planning Document which included a section, page 251, on Residential Moorings. The Mayor should require boroughs to produce similar plans appropriate to their locations

User: London City Airport

The Airport supports the principle of making better use of waterways and, indeed, has previously been in extensive dialogue with TfL and others in how the CADP proposals assist with this objective. As currently drafted part C of draft Policy SI17 states that development proposals into the waterways should generally only be supported for water-related uses.

This is too restrictive and non-water-related uses should be considered where appropriate and where they meet the other objectives of supporting and improving the protection of waterways.

There has been a substantial amount of non-water-related development which has underpinned the regeneration of the Royal Docks. This includes the consented CADP proposals which propose development within the docks to enable the enhancement and extension of infrastructure and passenger facilities at London City Airport. This development within the Royal Docks area has helped to support the regeneration of the area and enhance the social and economic effects. On this basis, there should be sufficient flexibility within the policy to enable non-water-related uses to play their role in wider regeneration of the area.

The potential for non-water-related uses is acknowledged in paragraph 9.17.2 which states that:

‘Generally, permanently-moored vessels and development into waterways should only be permitted for water-related uses. However, uses such as bars and restaurants (for example ancillary to a passenger pier), and improved access to or along waterways and related public realm, can add to the diversity, vibrancy and regeneration of waterways, in particular in basins or docks. The specific siting of such facilities requires careful consideration so that navigation, hydrology, biodiversity and the character and use of waterways are not compromised.’

For clarity, the Airport recommends that the policy is revised to acknowledge that non-water-related uses can bring significant social and economic benefits as long as it can be demonstrated that such uses would not
have a detrimental impact on navigation, biodiversity and character and use of the waterways. The Airport recommends the following amendments:

“C. Development proposals into the waterways, including permanently moored vessels and development into the waterways ~~should~~ **will** generally be supported ~~for water-related uses~~ **where it can be demonstrated that they will deliver benefits to the area and have no unacceptable impact on navigation, biodiversity and character of the waterways.”**

User:	Taylor Wimpey UK

We are supportive of the waterways policy's for London.

User:	Kew Society

Policy SI17 Protecting London's waterways

Paragraph 9.17.2 should also refer to the need to protect open vistas along rivers from buildings that protrude out over the river. We therefore suggest the wording **"development into waterways" should be amended to read "development into and over waterways".**

Paragraph 9.17.3 should be strengthened to prevent discharge from vessels.

User:	Joy Brown
9.17.3 Does this mean that there will now be on-shore power for the Enderby Wharf Cruise Terminal?	

User:	British Water

Within the Protecting London's Waterways section (SI17) there is the comment "Development proposals to impound and constrain waterways should be refused". Does this mean that dam/flow control solution to attenuate the flow and reduce downstream flood risk is already ruled out even if there is a flood risk reduction downstream and no flood risk increase upstream?

User: London national Park City Foundation

Protecting London's waterways - Policy SI17, Page 365 - 373

LNPCF PROPOSAL: This surprisingly weak policy and supporting text on restoring the natural function of rivers and waterways seem to be after-thoughts reliant on the under-resourced London Rivers Action Plan and voluntary action of catchment partnerships. The text briefly acknowledges that there is more than one river in London before reverting to issues of transport on the Thames, wharves and other matters. Resourcing for action to improve rivers and water course is also not expressly addressed in Chapter 11 on Funding of the London Plan on pages 452-3.

The Policy should explicitly set rivers and waterways as part of Green and Blue Infrastructure, restore use of the Blue Ribbon Network and require adherence to catchment management plans and priority project identified by those.

9.14.2 London's waterways are multifunctional assets. They provide transport and recreation corridors; green infrastructure; a series of diverse and important habitats; a unique backdrop for important heritage sites, landscapes, views, cultural and community activities; and drainage, flood and water management functions. As such, they provide environmental, economic and health and wellbeing benefits for Londoners. They are protected and their water-related use - in particular safe and sustainable passenger and freight transport, tourism, cultural, community and recreational activities, as well as biodiversity - is promoted. Many of these functions are also supported by boroughs' local Riverside Strategies, the Environment Agency's Thames River Basin Management Plan and the Port of London Authority's Vision for the Thames.

1. Development proposals that facilitate river restoration, including opportunities to open culverts, naturalise river channels, protect the foreshore and increase the heritage and habitats value, should be supported if appropriate. Development proposals to impound and constrain waterways should be refused.
2. Development proposals should support and improve the protection of the distinct open character and heritage of waterways.

Supporting text:

9.17.1 London's rivers have been significantly altered from their natural state. River restoration seeks to enhance their biodiversity, water quality and amenity value. The London Rivers Action Plan, and the Catchment Partnerships which support the Thames River Basin Management Plan, identify many opportunities for river restoration, as well as showing examples that have been implemented around London.

Policy T1 Strategic approach to transport

User:	Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living

T1 (402) ? Strategic Approach to Transport

The Mayor should take note that, in general, retirement proposals are located in accessible locations thereby assisting in reducing reliance on the use of private cars.

User: London Borough of Camden

Camden fully supports the policy commitment to the importance of delivering the targets for sustainable travel, and making the most effective use of land to ensure that these modes are supported. However, we consider that delivering Healthy Streets and the targets for mode-shift require a two-pronged approach, providing facilities for active travel choices on the one hand but also minimising opportunities for inessential car ownership and use on the other. The strategic policy should therefore include an explicit commitment to minimise or restrict car ownership and use, in line with the draft Mayor's Transport Strategy (MTS). This would also provide the framework for other transport policies outlined in the Plan, particularly, for example, car free/ 'car-lite' developments and the new parking standards.

We strongly support the Mayor's approach to increasing active travel as this will have a demonstrable impact on improving healthy and wellbeing.

User:	Siemens

1.1 Digital connectivity
Policies T1 and T3 consider the connectivity and accessibility of existing and future public transport. The city’s transport policies and forthcoming projects that provide travel options to rest of the nation and internationally should allow for the sustainable development of London. Siemens have developed certain technologies that can aid this process of connectivity.

User:	Age UK London - a charity working with older Londoners

POLICY T1: STRATEGIC APPROACH TO TRANSPORT

3) SPECIALIST TRANSPORT SERVICES FOR OLDER AND DISABLED PEOPLE (E.G. DIAL-A-RIDE).

User: Age UK London - a charity working with older Londoners

50. T1 LINK TO POLICY CHANGE As you can imagine public transport is of great importance to Older Londoners, who are still quoting the same longstanding issues of short crossing times at pedestrian lights, buses not pulling up to the kerb and setting off before older people are seated. There have been improvements at many crossings; these need to continue. The other issues mentioned may appear to be minor, however they cause discomfort and can cause injury, often unreported. At our conference on 8.2.18 older people in Camden reported overcrowding on buses which made it difficult for wheel chair users to access. People also reported that they wished to have direct routes to major areas such as CAZ especially Oxford Street. Of great importance was the creation of direct routes to and from hospitals especially where car parking was restricted.

A survey of Age UK London members demonstrated broad support for T1 but noted that frail elderly people would be excluded if they did not feel confident and if there was insufficient investment to create sufficient user-friendly, accessible transport to meet increased demands. It was noted this would benefit all travellers. The considerably increased length of journey time was noted together with the discomfort of carrying heavy bags of shopping.
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One member disagreed entirely and felt that disabled and older people with mobility restrictions or impairments who could not walk or cycle and may not feel safe using public transport were completely ignored. The fact that there are those who cannot walk or cycle was corroborated by others. Another recommended the provision of small run around buses with a drop-on drop-off facility outside of traditional bus stops but noted that this would only work with fewer cars. Another respondent agreed with the strategy because they “would have given up driving by then”. It is felt that the insertion of A3, provided that the specialist transport services were adequately resourced, will help to mitigate the adverse comments for T1.

User:	Karl Brown

Policy T1 a1) it is difficult to give any credence to a target for something as natural as walking 20 minutes per day to take more than a generation in achieving. This smacks of a lack of ambition – or possibly ideas. Five years, at the outside, seems entirely in keeping with the scale of the issue and its achievability given enough desire.

User:	Karl Brown
10.1.1 The “ambitious aim” to reduce dependency on cars will inevitably need to move from an “ambitious aim” to some specific carrot and stick supported by broadscale communication to ease the way via widespread understanding of the “why”.	

User:	Karl Brown
10.1.2 (and 10.2.6) Noted the conclusion that this is the “only” solution. Agreed.	

User: Association of Directors of Public Health

ADPH London recommends an addition to policy T1: Strategic approach to transport as follows: T1 C: **All development plans and development proposals should incorporate suicide prevention measures.**

To ensure that the Policy becomes a reality and that meaningful impacts for improving health outcomes are achieved, we strongly recommend that the Mayor:

1. Provides ongoing support to boroughs and local communities to implement the Policy and identify the interventions that will have the greatest impact at local level.
2. Establishes clear channels of accountability and governance for achieving the strategies goals, indicators and time-scales for implementation.
3. Ensures equity and fairness remain at the centre of all strategy initiatives.
4. Calls upon a multi-sector approach to implement and embed the Policy and the Healthy Streets agenda. Partnership working across all sectors, from health, planning and development to education and business, and through the established borough led Healthy Places Network, is vital to maximise the impact of the Policy.
5. Implements a thorough evaluation and development process to demonstrate impact and identify areas for improvement and encourage boroughs to do so at a local level.
6. Establishes a widely disseminated and clear communication strategy to share his vision with all Londoners, articulating the benefits to their lives, their health and how they experience and interact with their cit

We encourage the Mayor to do all he can to lobby central government and other city-leaders to adopt the Healthy Streets Approach and share learning across the nation so that everyone in the UK can benefit from breathing clean air, being active and enjoying the places where they live, work, play and grow

User:	Aiko Mizuno

Please also facilitate making safer cycle lane and cheaper and better public transport to reduce need for using private cars. The more people cycle the better for their health. The only way to reduce devastating road traffic accidents and air pollution is clearly to reduce number of cars. Please help enabling people to walk and cycle safely in London (inner and outer).

User: Angela Thomas

STREET POLLUTION

Italy and some parts of France have taken the initiative and made, many small streets in popular areas where people like to walk, drink coffee or dine al fresco COMPLETELY TRAFFIC FREE. They offer a safe, clean, quiet, and unpolluted area for city dwellers to relax and enjoy their city with their families. This is how many of these areas were originally designed not forthe aesthma inducing, lung poisoning areas they have become. Necessary deliveries could always be brought in late at night as used to be the case. Why do we put the car way ahead of people? Cars of course have their important place but not in these areas. Public transport is good enough to take us to all these places and should be used all the time. It is not a Divine Right as some people think to be able to drive their car absolutely anywhere at any time regardless of the consequences. I am proud of London but not or our pollution.

User: Graham Peacock

We need unobstructed travel for vehicles and to have more vehicular access. Less lorries during the day. Pedestrians must be segregated from vehicles. There must be more and easier access for the Disabled and their vehicles and free parking for all. Electric vehicles must be banned as nobody will hear them coming and there will be more crashes and deaths. Ideally London needs to be completely pulled down and redesigned so it can be used by its residents. Much easier access to shops will be essential particularly for the Disabled and Business restricted to the outer areas of London.

User:	Simon Hargrave
Finally, I would like you to commit to removing diesel and petrol cars from London roads as soon as possible.	

User:	Regent's Park Conservation Areas Advisory Committees

Chapter 10 Transport

T1 A 1) Draft policy: ‘the delivery of the Mayor’s strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041’

Our proposed amendments – reasoning: We very much welcome this policy. We seek to add to it to encourage sustainable use of water transport.

Our proposed revised text: ‘the delivery of the Mayor’s strategic target of 80 per cent of all trips in London to be made by foot, cycle, water, or public transport by 2041’

Policy T2 Healthy streets

User: NHS England

It is encouraging to see the recognition of wider determinants of health as wide-reaching and varied, extending far beyond traditional healthcare facilities. Good sleep, however, is not mentioned despite being an important contributor to positive health outcomes. We believe the plan should address the impact that development can have on the sleep of local communities by requiring developers to include appropriate mitigation for occupants through the planning process; such as restricting the hours during which construction takes place.

We also encourage the Mayor to cover the management and maintenance of the public realm in the plan, not just its design, as a means to encourage physical and social activity. Local Planning Authorities should be encouraged to use Community Infrastructure Levy (CIL) funds creatively in this regard.

User: NHS England

Section 10.2.3: Healthy Streets Approach

Children should specifically be addressed within the Healthy Streets approach. Developing pathways to support greater physical activity through walking and cycling, would be a contribution to the reduction in childhood obesity. We would also propose that routes to schools be prioritised.

User:	NHS England

Section 10.2.6: Strategic-planning level

The planning of other community infrastructures, such as new health facilities, will also be important to ensure that walking, cycling and public transport are the first choice of travel.

User: Revo

We believe that healthy streets can only be achieved through a multitude of factors in combination including reduced car use, better and improved transport provision and good, safe public realm – and how that fits into the wider strategic transport network. Good planning and design will be critical to meet the ambitions of the Plan and, as mentioned previously, Boroughs will need to work across their boundaries to ensure that London is working as a holistic city rather than a disparate set of Boroughs with conflicting aims.

We look forward to further guidance on how developments will be judged in regards the planning regime, and how Healthy Streets Indicators will be applied in practice.

User: London NHS Clinical Commissioning Group

Policy T2 Healthy Streets

We support the Healthy Streets Approach as advocated in clause C of Policy GG3 and Policy T2 and the supporting technical tool which links 31 metrics to the 10 indicators. It would be helpful if the indicators were referenced to other policies in the plan. Policy T4B suggests that the Healthy Streets Approach is applied to transport assessments submitted with development proposals. However, it is unclear in the draft Plan how the approach is to be applied to development proposals and local plans and how it relates to other assessments, notably health impact assessment and environmental impact assessment which address a wider range of determinants. It should be recognised that there will be different issues and challenges in central, inner and outer London which will require different policy responses and solutions, and that higher levels of development in outer London will need to be accompanied with higher levels of investment in public transport and active travel.

User: British Property Federation

The GLA’s commitment to healthy streets is commendable and we are pleased to see that the policy is forming part of the wider LP. We firmly believe that the approach to creating healthy streets should be a combination of factors; reduced car use, better and improved transport provision and attractive and safe streets for people to roam and dwell in. Thoughtfully designed public realm is key and creating high-quality environments which Londoners wish to use and feel proud of will in itself bring a host of benefits not only to the areas that have been created but also to the Londoners using them.

Good planning and design will be critical to the creation of healthy streets and, again as mentioned previously in this response, boroughs will need to work across their boundaries to ensure that London is working as a whole city rather than a disparate set of areas with conflicting aims. Developers, architects and land owners will also have their parts to play through from the planning and design stages to implementation and the public private partnership working is something which we are strongly in favour of.

User: Town and Country Planning Association

Policy T2 Healthy Streets

3.8.6 In its response to the draft London Health Inequalities Strategy, the TCPA has already highlighted its support for the Healthy Streets approach. In this submission the TCPA also highlighted the wider spatial benefits of planning for health beyond just the public realm and movement networks. For example, a healthy place should include considerations for the quality of the food retail environment but also promote local and community urban production of food. As Figure 1 illustrates there is a need to integrate all elements of healthy places to create a healthy environment as set out by TCPA's healthy development elements including links to Policy E9 on A5 hot food takeaways.

Figure 1: Diagram depicting high level comparison between TfL's Healthy Streets indicators and the TCPA's Healthy Developments elements

[Diagram can be viewed in full response PDF]

3.8.7 In summary the TCPA supported Policy T2 and recommends that the Healthy Streets approach is delivered in connection to wider determinants and elements of healthy places, including promoting healthy food environment in Policy E9.

User:	London Wildlife Trust
We welcome and support Policy T2.	

User:	Living Streets

We strongly support the Healthy Streets Approach as a way of delivering better streets for everyone in London.

We strongly support the Healthy Streets indicators being applied to new developments to ensure they are being designed to support this policy.

User:	Brixton Society
T2, Healthy Streets: We welcome the Healthy Streets approach. Development proposals should show how they will deliver improvements in support of the 10 Healthy Streets indicators.	

User:	London Property Alliance
The requirement to assess all new development proposals against the healthy streets indicators adds unnecessary additional detail and complexity.	

User: Silvertown Homes

Healthy Streets contributions

We understand the reasons why the Mayor is seeking to ensure that 80% of all trips in London is made by foot, cycling or public transport by 2041. As the Mayor is aware, developments can only support a certain amount of public benefits (such as affordable housing, open space improvements, etc) before a scheme becomes unviable. Moreover, any benefit must be directly related to the scheme and not used to rectify existing deficiencies (in the quality of surrounding public highway for example). It should be made clear in the supporting text to Policy T2 that:

? any financial obligations secured in respect of Healthy Streets improvements must be necessary to make the development acceptable in planning terms; directly related to the development; and fair and reasonably related to the scale and kind of the development, in accordance with the NPPF tests; and
? contributions can be “pooled” from several developments.

Policies T1, T2, T3, T4 and para 10.4.3 should all refer to the NPPF tests mentioned.

User:	PAFH - Physical Activity for Health (London Sport)

We support these points fully and particularly endorse the role of the Healthy Streets Approach outlined in detail in Policy T2 Healthy Streets.

User:	London Travel Watch
This policy promotes the Mayor’s ‘Healthy Streets’ approach to the development of London’s streets. This is supported.	

User:	London Travel Watch

It is noted that the Walk London Network is safeguarded. This is welcome; however, there is no policy support for the development of additional long distance walking routes.

There are still many locations where pavements do not exist, there are no dropped kerbs or crossovers, pavements are too narrow, pedestrian crossings unavailable or not at the locations pedestrians would want them. Sometimes there are physical barriers to comfortable and direct walking. There should, therefore be policies to ensure these deficiencies are rectified when development takes place.

The roll out of Legible London should be supported by a policy. It should specifically promote the map-based wayfinding signs, rather than the finger posts that have been allowed to proliferate over the last few years, contrary to the original concept of the scheme.

All streets should have street nameplates in an appropriate location.

User: John Lewis Partnership

Policy T2 Healthy Streets *page 403*

The John Lewis Partnership supports the overall aim of this policy. However there should be recognition of the important role that freight and deliveries play in the capital, not just in terms of servicing businesses, but also residents. If Londoners are to be encouraged to not use cars or to be more reliant on public transport, they will be even more dependent on the freight industry. Section 10.2.5 should be reworded to say that 'the Mayor will *continue* to work with the freight industry, its customers and London's boroughs to develop creative solutions to managing freight and deliveries. This is in recognition of the good work that has already taken place and continues. The John Lewis Partnership is always looking to optimise efficiency in its deliveries, both in terms of greener technology and delivery consolidation. The role that the Mayor, TfL and the boroughs can play is in supplying the right support for this, such as reforming the London Lorry Control Scheme, reviewing night-time delivery restrictions and ensuring appropriate kerbside access is available at the times of day required.

User:	London Borough of Sutton
SUPPORT. The London Borough of Sutton supports this approach and is already considering the policy as part of proposals to increase housing in town centres.	

User: Centre for London

Policy T2 Healthy Streets

We endorse this approach. *Street Smarts* argued for concerted action to promote active travel modes and healthy streets, including continuing re-allocation of road space:

· "TfL and the boroughs should continue to reallocate space in line with a clear road space hierarchy, using intelligent street design to prioritise the most efficient and appropriate modes by providing a combination of: adequate pedestrian space, new segregated cycling lanes and Quietways, priority bus lanes and rapid bus transit services, and consideration of where emerging shared mobility services sit in this hierarchy."

User: Chartered Institute of Logistics & Transport

Healthy streets must also be living streets with activities centred on buildings. This is different from green spaces, and building-centred activities need access for deliveries and servicing, as well as for people. Policy T2 should therefore note the requirement to include servicing and deliveries in the design of healthy streets.

CILT continues to have serious concerns about Policy T2 D 2 which suggests that development proposals should reduce the dominance of vehicles, but does not show any understanding of the need for those vehicles to be on a particular street. The use of evidence to support the approach as indicated in paragraph 10.2.3 is supported provided that the evidence includes such an understanding.

Paragraph 10.2.4 refers to reducing vehicle speeds, although this is not part of the policy. CILT has concerns that methods of reducing speeds are not effective, can be counter productive in terms of air quality, and can adversely affect public transport. There may be opportunities associated with future technology to deliver safer driving, including lower speeds where appropriate, which should be supported, rather than crude, ineffective and counter-productive measures. It will also be necessary to educate and enforce safe behaviour by all users, including pedestrians, cyclists, as well as motor cyclists and vehicle drivers.

Paragraph 10.2.8 refers to the Mayor's long term vision of no deaths or serious injuries on London's streets. CILT notes that this is a change from the draft Transport Strategy of a time related target, and supports this change, given that the MTS target would have been unachievable.

User:	CFGN Community Food Growers Network	
Policy no for reference	Amendments	Justification
T2	WE support the healthy streets approach but would like to see a reference to nature and biodiversity in the breakdown of what a healthy street is.	Strong evidence that access to nature is key for health and wellbeing and healthy streets should reinforce the idea of green infrastructure and nature corridors.

User: London Borough of Newham

Policy T2 Healthy Streets

Generally LBN are fully supportive of the policy and the approach that underpins the transport policy and links to other objectives such as health, which is complementary to Newham's Draft Revised Local Plan, particularly around cross cutting policies/themes that seek to promote healthy and quality as a key component of the strategy in which Healthy Streets is supported.

Further detail is however needed on the implementation, particularly where some of the indicators are not particularly relevant to a scheme, and recommended to be applied flexibly. LBN would request clarification as to whether any of the 10 indicators should be prioritised for instance.

The policy could also more explicitly reference improved public transport journey times (particularly bus reliability) as a key outcome of T2.B.1. Whilst this is recognised as a key barrier to movement, this is particularly important at a strategic level that growth does not impact public transport reliability which has knock on impacts on peoples sustainable travel impacts.

User: Exhibition Road Cultural Group

Policy T2 Healthy Streets

We welcome policy T2 to promote and demonstrate the application of the Mayor's Healthy Streets Approach to: improve health and reduce health inequalities; reduce car dominance, ownership and use, road danger, severance, vehicle emissions and noise; increase walking, cycling and public transport use; improve street safety, comfort, convenience and amenity; and support these outcomes through sensitively designed freight facilities. We agree that it is important to identify and encourage opportunities to the improve the balance of space given to people to dwell, walk, cycle, and travel on public transport and in essential vehicles, so space is used more efficiently and streets are greener and more pleasant.

We welcome policies to ensure public realm schemes should deliver against 10 Health Street Indicators and measures to reduce the dominance of motor vehicles. We would welcome the opportunity to work with Boroughs and the GLA to improve the walking environment around the South Kensington strategic cultural cluster.

User:	Hoare Lea LLP`

The Plan proposals appears to suggest a reduction in the available traditional road vehicle space. This suggests greater priority or potential for shared priority for cyclists/pedestrians on roadways,
There is a potential for developments with taxi ranks / drop off zones / car parks etc. (new or existing) to include signage advising drivers to turn off their engines while stationary.

User: Highgate Society

Object

Regrettably bus connectivity has been extremely adversely affected by the changes made recently in London's traffic flows through the removal of gyratory systems . In Highgate's case, this has been particularly noticeable at Archway, especially causing difficulties for people with protected characteristics. Lessons should been learnt, approaches revised and mistakes acknowledged and rectified in line with the Mayor's philosophy, especially as by 2041, "London's transport networks will need to cater for over five million additional trips every day (10.3.2)"

A very serious omission is the lack of any policy to protect the further decline in the average speed of buses. There are many policies to restrict car usage on public roads in order to benefit cyclists and pedestrians and our concerns at the Archway are indicative of the lack of attention paid to the interests of bus passengers. There was a time when their interest was reflected in the introduction of bus lanes. Why is there no mention of these or of bus only roads in the plan? We see no reason why we should not have dedicated bus routes just as we have dedicated cycle paths which would serve a much higher percentage of the population.

User:	London Borough of Ealing

Healthy Streets
(T2)

The Council support this policy and it aligns with our own Transport Strategy.

Regards Para 10.2.3, as a minimum, we consider that by 2041, all Londoners should do at least the 30 minutes of active travel they need to stay healthy each day, in line with the most current guidance from the Chief Medical Officer, rather than the 20 minutes stated.

User: Natural England

We welcome the text to support the use of greening within new development in paragraph 10.2.4,

Appropriate creation of greenspace may increase the attractiveness of travel routes and further encourage travel by foot or bicycle. Any reductions in on-street parking provision as a result of the drive to shift away from reliance on cars may free-up street space, which could be used for additional greenspace such as wildflower verges, pocket parks or rain gardens.

Recommendations:

1) We recommend that ‘Greenspace’ is included as a Healthy Street Indicator in order to fully recognise the benefits of greenspace in ensuring that streets have a positive effect on the health and well-being of residents.

2) An addition to paragraph 10.2.4 to read *‘Measures which improve Londoners’ experience of individual streets, including greening, to encourage them to live active lives should be embedded within new development,* ***taking advantage of any opportunities to green any redundant road space’.***

User: DPDgroup UK Ltd

Policy T2 Healthy Streets

DPD supports the healthy streets initiative and its objective to reduce KSIs, especially associated with transport and the logistics industry.

As the UK's leading parcel delivery company, we are actively working to reduce emissions and congestion. This is being achieved through major investment signed off by our owning board. This is a considerable expense to DPD and the Mayor should formally recognise private sector funding that helps achieve on London's goals.

In addition, the logistics industry and vehicle manufacturers are significantly committing financially to the healthy streets agenda. It is vital that any regional requirements, conditions and regulations introduced are pragmatic and achievable for all operators and provide a time frame that allows for a progressive rate of change.

It should be recognised that the freight industry and the CEP sector will continue to grow in importance as London strives to take cars off the street.

User: Historic England

The integration of historic assets into improved infrastructure and public realm can greatly contribute to creating characterful places. London's historic buildings and places provide the distinctive environments in which people wish to spend time, and provide the inspiration for place-making, including public realm enhancement schemes.

Historic England is encouraged to see many good examples of this, from the smaller scale regeneration of Deptford Station yard, utilising a listed structure as a centre piece for a new public space, to the public realm enhancement of Kingston Market Place, drawing people in to enjoy this special place. At a larger scale, the major transformation at Kings Cross demonstrates excellence in the design of a new public realm which responds to, and makes the most of historic structures and waterways, providing for new views of the historic townscape. (See *Translating Good Growth for London's Historic Environment* for these, and other, examples).

We recommend the following addition to the end of para 10.2.4:

'Opportunities to enhance the experience of London's streets by drawing inspiration from, and complementing, historic townscape and features should be promoted'

Historic England further recommends that the Healthy Streets indicators **specifically reference historic streets and places** as positive factors promoting an attractive public realm, supporting measures to increase walking and cycling. This is a key recommendation in our response to the Mayor's draft Transport Strategy.

User: Design Council

Health and Well-being

35. There is a growing body of evidence that shows how the design of buildings, streets, parks and neighbourhoods can support good physical and mental health, help reduce health inequalities and improve people's wellbeing. Conversely, car-oriented environments and hostile public spaces can contribute to sedentary lifestyles and social isolation, increasing people's risk of disease[2].

36. We firmly believe healthy environments are fundamental to developing people centred, sustainable and prosperous communities. Designers and planners that consider how a place results in better health outcomes for a population gives the opportunity for development to respond positively to challenges of public health and generate thriving urban spaces.

37. We therefore fully support the 'Healthy Streets Approach' to creating a healthy, inclusive environment in which people choose to walk, cycle and use public transport. This has the potential to improve health and reduce health inequalities. Monitoring the impact of the Healthy Streets Approach and linking this to better local health outcomes in different locations will be a crucial means of assessing the impact and efficacy of these policies. This will help to build an evidence base which could enable a positive cycle of saving and investment.

[2] Design Council (2014), Active by Design,Guide {online: https://www.designcouncil.org.uk/resources/guide/active-design-designing-places-healthy-lives}

User: Sustrans

Sustrans strongly supports the inclusion of Healthy Streets as policy T2, for the priority this gives to walking, cycling and public transport and the mechanisms included in this policy to ensure that development delivers improved streets, walking and cycling networks.
A - We welcome an approach that would see patterns of land use that reduce the need to travel by car, and facilitate shorter trips by walking or cycling.
B – We strongly support the requirement for development plans to (1) promote and demonstrate the application of the Healthy Streets Approach and concomitant reduction in car dominance, ownership and use; and (2) identify opportunities to improve the balance of space given to people to dwell, walk, cycle and travel on public transport. We are concerned Draft New London Plan 2017: Sustrans response 24 of 36 that a lack of definition of ‘essential vehicles’ leads to ambiguity and confusion.
C – We strongly support the requirement for new and improved walking, cycling and public transport networks to be planned at an early stage in Opportunity Areas and other growth areas and incorporating the Healthy Streets Indicators as a mechanism to track delivery against this requirement and ensure quality in street design for sustainable modes.
D – We strongly support the requirement for development proposals to: (1) demonstrate improvements against the Healthy Streets Indicators as a mechanism to track delivery and ensure quality in street design for sustainable modes; (2) reduce the dominance of vehicles both moving and

Policy T3 Transport capacity, connectivity and safeguarding

User: Hornsey & Wood Green Labour Party

Development should be at sites where there is or can be created accessible public transport provision and adequate, safe and pleasant cycling and walking routes.

We favour the extension of ULEZ to the whole of Greater London at an early date. Policy should encourage the use of electric or other non-ICE powered vehicles but in the context of discouraging powered private transport of all kinds because, whilst reducing the emission of toxic fumes at the point of use they still involve the emission of greenhouse gases during manufacture and still create danger and congestion on the road.

We favour the development of a road pricing scheme in which the cost of journeys by car is immediately apparent. This should have the effect of reducing car journeys.

We oppose road schemes which have the effect of increasing capacity for private cars. This includes the Silvertown Tunnel scheme.

There should be specific mention of the need to improve air quality. This should also be the subject of an additional clause in policy GG3.

User:	Landsec
T3 Transport capacity, connectivity and safeguarding: Landsec supports the transport initiatives and associated policies listed in the Plan to help ensure we invest in and provide the transport infrastructure required to keep London moving.	

User: London City Airport

Policy T3 seeks to ensure that effective transport policies and projects are developed to support the sustainable development of London and the wider South East as well as to support better national and international public transport connections. Part D of this policy specifically seeks to give priority to delivering upgrades to Underground lines, securing Crossrail 2, the Bakerloo Line Extension, river crossings and an eastwards extension of the Elizabeth Line.

The Airport supports these objectives and in particular the delivery of Crossrail 1 and 2, which are essential for providing easier, quicker and more direct travel opportunities across London. Crossrail will ease congestion on London's public transport system and at the same time encourage regeneration and social inclusion by better connecting different parts of the city.

The Airport has an ambition of building a Crossrail station in the Silvertown area which will transform travel to and from the airport. A Crossrail station in such close proximity to the airport will improve local accessibility and potentially become one of the primary modes of travel to and from the airport resulting in reduced car dependency. It would establish a major transport interchange in the Royal Docks as it is located close to London City Airport DLR station thus freeing up DLR capacity. The Silvertown station will be within walking distance of significant development sites in the Royal Docks area contributing to its regeneration.

Most importantly, the delivery of a Crossrail station would bring improved strategic access to other airports resulting in an integrated airport system in the South East. There would be a direct link between London City Airport and Heathrow, a one-step interchange between Gatwick and Luton via Farringdon and faster links to both Stansted and Southend.

User: Kent County Council

KCC strongly supports your identification of Elizabeth Line extension (C2E) and the Lower Thames Crossing as critical strategic infrastructure projects. We are already working closely with neighbouring London boroughs in the development of the C2E and are part of a working group with Transport for London (TfL), Network Rail, the London Borough of Bexley, Thames Gateway Kent Partnership, Ebbsfleet Development Corporation and Gravesham and Dartford Borough Councils, in preparing a Strategic Outline Business Case for the proposed extension.

These projects offer real opportunities for enhancing transport links between Kent and London, prospering both economies. In Kent, C2E will establish a strategic interchange between High Speed One and Crossrail outside the M25, providing a major economic stimulus for Dartford, Gravesend and the new garden city at Ebbsfleet. In doing so, C2E will also deliver additional connectivity between the South East, London and with HS2, onwards to The Midlands and The North.

User: Kent County Council

KCC fully supports the Elizabeth line extension east of Abbey Wood to Ebbsfleet which will be particularly important for growth in the Thames Gateway Kent area. Although Crossrail 2 alone does not directly benefit rail passengers from Kent, its delivery is clearly an essential element of London's overall rail infrastructure. The interchange at Tottenham Court Road between the Elizabeth Line and Crossrail 2 will provide a single change for passengers from
Abbey Wood for destinations in south-west and north-east London, which would potentially be of benefit to Kent's rail passengers who choose to change to Elizabeth Line services at Abbey Wood.

The delivery of the Elizabeth Line in full by December 2019 is strongly supported by KCC. Its south-eastern terminus at Abbey Wood will provide easy interchange from the South Eastern franchise services linking this station with Dartford and Gravesend, and also with the new Thameslink Services extending to Rochester, Chatham, Gillingham and Rainham in Medway Council's area. Furthermore, the new interchange at Farringdon with Thameslink services using the central core will provide rail journeys with just one change between Abbey Wood and a wide range of destinations in south-east England which will be served by the full Thameslink Programme network from December 2018.

The proposed extension will provide an essential transport corridor to serve the significant uplift in housing, employment and leisure developments planned, or already being built, in Ebbsfleet Garden City and in the wider Thames Gateway Kent area. Such an extension would also provide additional connectivity for domestic passengers from other parts of Kent, and for international rail passengers travelling from Paris, Brussels, Lille and Amsterdam with a single change at Ebbsfleet to an extended Elizabeth Line.

However, KCC is concerned about the devolved suburban rail services to enable London suburban metro scheme. Conversely, we support the decision to retain the Metro services within the new South Eastern franchise, and we will work with the Department for Transport (DfT) to ensure improved Metro services to Dartford, Gravesend and Sevenoaks. Therefore, KCC accepts the scope of the forthcoming franchise as settled, following the Secretary of State's decision not to transfer the South Eastern Metro services to TfL.

Whilst the objective of a unified suburban rail network within London is recognised, the County Council does not accept that such a change in control would deliver the estimated 124,000 additional seats into Central London in the peak period or reduce journey times by up to 15%. There is finite capacity at all the South Eastern franchise termini in the peak periods, which, even with train lengthening, are not currently capable of delivering that level of additional seating capacity.

KCC does have concerns regarding the potential for withdrawal of a high-speed service from the Kent County Town (Maidstone) to London St Pancras, with the alternative option of a service to Abbey Wood potentially not providing a suitable substitute for this high speed service.

KCC fully supports the scheme to increase national rail capacity. Kent’s proximity to the Capital and existing transport links such as High Speed 1 makes it an attractive area for commuters working in London. With rail capacity already stretched, it is imperative additional capacity is provided to enable the rail network to function efficiently in line with anticipated future passenger growth.

User: Cross River Partnership

The Thames

The River Thames is the defining landscape, historic and natural feature of London and the crossing at London Bridge was the origin of the city. We believe it should feature more strongly in London Plan policies and that more emphasis is given to addressing routes on and along it and the positive economic, social and environmental contribution it makes. The London Plan has a particularly important role in providing a coherent approach given the Thames passes through so many boroughs.

We request that there should be an amend to Policy T3 to establish an intention to provide expansive, continuous public access to the riverfront, address any gaps in provision and support the Thames Esplanade through central London.

User:	Kent Leaders

Your recognition of Thames Gateway (Elizabeth Line extension and HS1) and the Lower Thames Crossing as critical strategic infrastructure projects (and set out as Strategic Infrastructure Priorities in Figure 2.15) is strongly supported. Officers have been engaged with your officers, the London Borough of Bexley, Transport for London and others to explore the potential for rail improvements beyond the current Crossrail terminus at Abbey Wood and the County strongly backs the Mayor’s support of the London Borough of Bexley and adjoining Kent authorities in seeking an extension of the Elizabeth Line (paragraph 2.1.53). Support is also given to Policy T3, in classing it as a priority for delivery through planning decisions. Notwithstanding this, major capital contribution to the Crossrail extension, as well as for necessary infrastructure, will be required and funding support from the Mayor will be crucial.

User:	South East England Councils

3.6 Challenges exist in the South East for those commuting within the area, as well as those commuting in and out of London. These include train overcrowding, increasing demand for rail travel, rises in fares, the need for new orbital and radial routes and improving the reliability of existing services. The South East also provides an important global economic transport gateway for businesses from London and nationwide, giving access to international ports and airports. SEEC’s Missing Links report further highlights the need for strategic infrastructure investment in the South East to maintain its economic potential. Tackling the infrastructure funding gap is a shared priority to ensure a strong economic future for our areas, and the UK as a whole.

User: L&Q

Healthy Streets contributions

We understand the reasons why the Mayor is seeking to ensure that 80% of all trips in London is made by foot, cycling or public transport by 2041. As the Mayor is aware, developments can only support a certain amount of public benefits (such as affordable housing, open space improvements, etc) before a scheme becomes unviable. Moreover, any benefit must be directly related to the scheme and not used to rectify existing deficiencies (in the quality of surrounding public highway for example). It should be made clear in the supporting text to Policy T2 that:

? any financial obligations secured in respect of Healthy Streets improvements must be necessary to make the development acceptable in planning terms; directly related to the development; and fair and reasonably related to the scale and kind of the development, in accordance with the NPPF tests; and

? contributions can be “pooled” from several developments.

Policies T1, T2, T3, T4 and para 10.4.3 must be justified against the NPPF tests for planning obligations.

User: Local London Partnership

Deliverability

This concern touches on the issue of whether the Plan is sound and, in particular, if the Policies are justified and likely to be effective. We are concerned that the Plan may not be capable of meeting the objectives spelt out in the Policies for Good Growth. We are mindful of the statement made by the Deputy Mayor for Planning, Regeneration and Skills at the London Assembly Planning Committee in answer to a question about what he Plan will deliver. *"I think it will if this blueprint is followed, because that is what it is. It is a blueprint for how it can be done, and I come back to my earlier point about the funding. If we cannot either get fiscal devolution or if the Government, alternatively, does not step back into the space of subsidising social infrastructure to levels that it was previously or approaching those levels, if all we are left with is trying to tax developments to deliver all of this, then, no, I do not think we will deliver it. However, as I say, it is a blueprint to show how it can be done and how we think growth can be handled well, including a chapter of what we think needs to be funded to be able to deliver this."* These funding needs are spelt out in Chapter 11. The chapter deals particularly with the increased investment in infrastructure and fundamental changes to the housing market needed to achieve the step change in housing delivery envisaged in the Plan. The significant need to invest in enabling infrastructure, water, energy, waste, digital connectivity and social infrastructure is also referenced. The public sector funding gap is particularly emphasised (para 11.1.8). Funding the infrastructure to support growth is a necessary prerequisite to achieve Good Growth in the Local London area.

Our concern is that these investments are dependent on public policy decisions by Government which are outside and independent of the Plan making process but are stated to be key to the delivery the London Plan policies. This makes the whole Plan uncertain. In Local London there is particular concern that the investment in public transport infrastructure required to enable Good Growth will not be forthcoming, or at least not at the same pace as housing provision, leading to adverse impacts on the Plan's Policies for Good Growth. A lack of new public transport provision will lead to greater use of motor vehicles for trips and increased road congestion, particularly in outer London, with adverse impacts people's ability to move around the City (Policy GG1/A), on health through increased pollution (Policy GG3/A) and on transport provision (Policy GG5/G) and Policy T3

User:	dp9
BPS welcomes Policy T3, including the aspiration to protect and improve the Thames Path.	

User: dp9

Buses

5. Policy T3 states that development proposals should support capacity, connectivity and other improvements to the bus network to ensure it can operate efficiently. BPS welcome the emphasis on ensuring bus capacity and connectivity aligns with new development proposals and looks forward to discussions with TfL regarding bus access and service arrangements for the BPS development following completion of the NLE in 2020.

User: dp9

London Overground

6. Various London Overground extensions are noted in Table 10.1 as part of an indicative list of transport schemes. BPS would strongly support extensions and increased capacity on the London Overground network, and particularly on the South London Line.

7. BPS has previously presented TfL with an effective and low-cost option for extending London Overground services on the South London Line to a secondary terminating point (in addition to Clapham Junction) at Battersea Park Station. This is shown to deliver significant additional connectivity between Battersea and
a range of South London destinations resulting in significant journey time improvements and is supported in principle by the London Borough of Wandsworth. BPS would welcome further discussion with the Mayor regarding this opportunity and the potential benefits it could bring. A summary of this proposal is
provided in Appendix A.

RECOMMENDATION: Adopt extension of the London Overground network to Battersea Park Station as a committed transport scheme.

User: dp9

Crossrail 2

8. BPS welcome the Mayor’s continued support for Crossrail 2 and see it as a critical piece of infrastructure for south-west London given its aim to reduce passenger and service congestion at Clapham Junction.

9. BPS would ask the Mayor to ensure that further opportunities for enhancing the existing rail corridor between London Victoria and Clapham Junction, particularly surrounding Battersea Park Station, are fully explored should Crossrail 2 be implemented given that it is likely that capacity on the existing rail corridor
would be released.

RECOMMENDATION: Provide support for further opportunities for enhancing the existing rail corridor between London Victoria and Clapham Junction.

User:	S Horne
No to HS2 – not needed	

User: Standard Life Investments

Policy T3

We support Policy T3. The DLR extension to Gallions Reach and Abbey Wood should also be listed as a priority project in Section D of the Policy and therefore wording should be amended as follows:

"In Development Plans and development decisions, priority should be given to delivering upgrades to Underground lines, securing Crossrail 2, the Bakerloo Line Extension, river crossings, ***the extension of the DLR from Gallions Reach to Abbey Wood and Thamesmead*** *and an eastward extension of the Elizabeth Line.*

User: Innova Investment Partnership

Clapham Junction Station is of strategic importance to the national rail network – it is Europe's busiest rail interchange facility and serves national, regional and local rail services leaving and entering Victoria and Waterloo. However, the Station currently operates under severe pressure and improvements are critically needed – many of the services running through the Station are currently at full capacity during the AM/PM peaks, and the Station struggles to meet existing passenger demands. Furthermore, with the potential for the Station to become a future Crossrail 2 interchange, the pressure on the existing station infrastructure will only increase. Resolving these capacity problems at Clapham Junction Station has, therefore, been recognised by the National Infrastructure Commission as a key priority for London; with a critical need for significant investment to ensure the station can meet both current day demands as well as the increasing demand generated by London's planned growth.

To deliver a new comprehensive and fit for purpose Clapham Junction Station there is a need to bring forward additional development on surrounding land and on a new development deck above the Station that can generate funding towards the cost of the new Station infrastructure. This over station development presents a unique opportunity to deliver a very significant number of new homes and jobs to contribute towards meeting London's strategic growth targets and acting as a catalyst for wider town centre regeneration. With the value generated from the development critical funding will be contributed towards the cost of the new Station.

Innova has undertaken a significant amount of technical work to demonstrate the feasibility of creating a development deck over a new reconfigured station. The feasibility work demonstrates that redevelopment, including the deck and reconfigured station, can be constructed without materially effecting station capacity during the construction phase. Subject to wider design matters, it is possible to construct a development deck that creates around 16 hectares of new development land.

The Clapham Junction Station opportunity is substantial. Innova is fully supportive of the proposal to designate Clapham Junction as a new Opportunity Area in which to deliver a significant number of new homes and jobs. However, the draft text for the Clapham Junction Opportunity Area (2.1.26) does not fully recognise the opportunity presented by the proposed comprehensive redevelopment of the station and improvements to the rail network.

Innova requests a series of amendments to the wording of the draft Clapham Junction Opportunity Area text as set out below. These are consistent with changes sought by Network Rail in their separate representations:

Clapham Junction OA *[paragraph 2.1.26]*

Clapham Junction is Europe's busiest rail interchange ~~station, and a designated Major town centre~~ serving key commuter routes from West London and Southern England, and is identified as one of London's four strategic interchanges expected to accommodate rising levels of demand. However, the station is already operating at capacity in terms of rail services and passenger numbers and suffers from over-crowding at peak times. Reconfiguration of the existing rail infrastructure and the station is needed to increase capacity and substantially improve passengers public transport experience.

A comprehensive approach to the rail network station improvements along with Tthe proposal for a Crossrail 2 station ~~this represents~~ presents a unique opportunity to make more efficient use of land above and surrounding the station for residential and commercial development, including new retail and offices as part of the designated Major town centre. The ~~station suffers from over-crowding at peak times, and requires significant investment to allow it to accommodate future growth in passenger numbers.~~ The Planning Framework will need to fully explore and evaluate options to comprehensively deliver a reconfigured station together with over-station development that reflects the role of Clapham Junction as a strategic transport interchange and growth corridor. ~~for comprehensive over-station development, which would be reliant on a reconfiguration of the station layout.~~ This will include the consideration of complex technical issues related to the operation of the railway and the integration with other transport infrastructure and services, including Crossrail 2. Careful consideration will need to be given to the urban design and place-making of the development and its integration into the existing streets and functions surrounding the station. It will be important to consider integration of any development with surrounding residential areas, and the Housing Zone.

User: Innova Investment Partnership

ii) THE NEED AND CONTEXT FOR RAIL AND STATION IMPROVEMENTS

This section demonstrates the case for change at Clapham Junction Station. The need for comprehensive infrastructure improvements to the Station is critical and necessary in order to serve Londoners and commuters over the new London Plan period and beyond. The growth of London will be significantly hampered and challenged should comprehensive improvements not be realised.

Existing demand, overcrowding and safety

Demand for travel at Clapham Junction Station has grown rapidly over time. Based on figures published annually by the Office of Rail and Road, there has been over a 25% growth in passenger footfall at the station over the past four years. Consequently the station and surrounding transport network are operating under increasing pressure, a further 22% rise in the AM peak period and 25% rise in the PM peak period is predicted by 2031 (Ref: LTS-PT TfL models 2011 to 2031 without Crossrail). The National Infrastructure Commission has recognised operational station, platform and rail capacity issues at Clapham Junction as key priorities to ensure that the City's future growth is not hindered.

The station has 17 platforms and provides entry and exit to rail services running on the West London Lines, Windsor Lines, South West Main Lines and Brighton Main Lines. The existing layout of the railway infrastructure limits the number, frequency and reliability of the trains passing through or stopping at Clapham Junction, thereby acting as a constraint on the number of trains calling at the station to serve passenger demand.

Existing platforms are too short to accommodate future capacity enhancements specified by Network Rail. Due to selective door opening to cater for short platforms passengers are forced to concentrate boarding/alighting at central carriages resulting in severe overcrowding, an increase in 'dwell' time and delays to services.

Existing curved platforms result in unsatisfactory stepping distances between the trains and platforms limiting accessibility for persons with restricted mobility, increasing the safety risk for passengers, and increasing the 'dwell' time taken to dispatch the train from the platform.

Services travelling through the station are some of the most overcrowded on the rail network in the UK. The operation of the station relies on crowd control measures, which offer only some alleviation. Any disruption to the wider network associated with Clapham Junction has a negative impact on the station, leading to congestion on the staircases to the platforms, subway and footbridge.

The station has three entrances, namely Grant Road to the north, St. John’s Hill to the south, and Brighton Yard to the southwest. The Grant Road and St. John’s Hill accesses lead to a constrained subway, connected by inadequately sized staircases, to the eastern ends of all platforms. The subway is overcrowded during peak hours, and ticket barriers at both ends present pinch points. The Brighton Yard entrance leads to a wider covered footbridge, which joins the western ends of all platforms. Overcrowding is also a regular occurrence on the footbridge. The lack of capacity to accommodate pedestrian cross-flow throughout the station results in severe queuing onto the platforms.

User: Innova Investment Partnership

Interchange and Severance

The position of the railway tracks at Clapham Junction Station present a significant physical division between the adjacent Latchmere Ward to the north and Northcote Ward to the south. Beyond the crowded subway and footbridge the current station design offers limited permeability for movement to and from the surrounding area.

Adjacent to the station boundary Falcon Road (A3207) provides a north to south connection; however, the link is of poor quality, has limited capacity and becomes congested during peak periods. The southern end of Falcon Road has benefited from some public realm improvements in recent years. Nevertheless, towards the north the pedestrian environment is considered generally unpleasant, particularly during times outside of daylight hours with a section of the route passing under railway tracks. The position and layout of the Winstanley and York Road residential estates adjacent to the north of the station causes further severance to movement. The area to the north of the station, which is subject to a masterplan being promoted by London Borough of Wandsworth council, will need to be carefully integrated into a comprehensive station redevelopment as part of a wider Planning Framework.

The continued demand for travel at Clapham Junction Station has resulted in many aspects of the adjacent transport network offering a low level of service, including:

• Pedestrian access to/from the main entrances is congested during peak times due to inadequate widths and significant footpath clutter.

• Cycle parking is underprovided with all existing cycle parking around the station completely utilised. The site does not connect directly with existing nor planned cycle infrastructure, and conditions for cycling are generally poor.

• Clapham Junction is a major bus interchange, with 16 routes (including eight terminating/ starting at the station) accessed via 13 stops within a short radius of the station. However, bus operations in the area are disjointed, and bus stops interfere with pedestrian access to the station. The existing bus stops on St. John’s Hill and Falcon Road become congested during peak times. Moreover, there is standing space for up to 11 buses in the surrounding area, with eight spaces located on Falcon Road and three on St John’s Hill. These arrangements are informal and of a temporary nature and do not include formal driver facilities. TfL’s Railplan outputs suggest that approximately 50% of all people using Clapham Junction arrive/ leave by bus, which highlights the importance of having bus stops within close proximity to the station entrance.

• The road network surrounding the station has limited capacity and becomes congested during peak times, impacting upon bus services serving Clapham Junction. It also does not adequately provide for cycle provision.

• Both taxi and delivery and servicing arrangements are informal and not efficient in serving a modern society, where efficiency and consolidation are key in maximising economic and environmental benefits, through new technology and good practice.

User: Innova Investment Partnership

Future demand and constraints

Future rail improvements have been identified by Network Rail as part of its proposed Control Period 6 (CP6) enhancements. These would alleviate congestion, but would not provide a longer-term comprehensive solution for interchange with other services, nor would they fully address wider transport issues. Furthermore, this option will likely limit any future opportunity for comprehensive redevelopment and the potential to unlock the level of investment needed to deliver a comprehensive transport solution addressing the range of issues which exist at the station.

It is also intended that the station will be served by Crossrail 2 from 2033, including a new interchange. The proposals aim to free capacity from rail services by diverting significant numbers of southwest London commuters to Crossrail 2 services. This would lead to significantly increased passenger interchange numbers at parts of the station.

Additionally, there are further planned and proposed enhancement works to deliver increased rail capacity across all existing services including London Overground, and the West London Line link to Old Oak Common for connection to High Speed 2 services.

The current station design is not fit for purpose for existing operations which will be further exacerbated by future demand, the possible introduction of Crossrail 2 and other network changes. To resolve capacity problems at Clapham Junction it is considered that fundamental investment and station re-modelling with an integrated approach is needed.

User: Innova Investment Partnership

The Wider Policy Context

The draft Mayor's Transport Strategy ('MTS') that supports the London Plan recognises that rail is 'critical to securing London's economic growth and future prosperity', and the Mayor makes a commitment to work with Network Rail and TfL to transform London's rail-based services and stations to deliver an increase in capacity of at least 80% by 2041 to tackle over-crowding issues and facilitate mode shift to rail. It is recognised that the increased capacity of train services must be accompanied by improved station capacity for London's rail system to work as a whole, and Clapham Junction is identified as a 'priority station' to increase capacity and maximise public transport connectivity across inner and outer London. The station is also identified as one of four 'strategic interchanges' within London.

Recognising the role transport can play in helping to deliver London's housing and job growth requirements, the MTS promotes the creation of high-density, mixed-use developments around transport stations. It states that surplus and under-utilised land around stations can be used for increased housing delivery and high-density development, that can act as a catalyst for the regeneration of town centres and revitalising high streets.

Importantly, the MTS further states that creating such high-density, mixed-use places to meet London's growth needs will require transport investment to be fully aligned with the growth strategy to be set out in the new London Plan. This means 'maximising the capacity of the existing public transport network, optimising land use around stations and radically improving conditions for walking and cycling, supporting higher densities'.

User: Innova Investment Partnership

(iii) THE OPPORTUNITY

There is a clear synergy between the policies and principles in the draft London Plan, the draft MTS and the opportunity that exists at Clapham Junction to provide a strategic interchange for London, supported by high density mixed use development. The opportunity is presented by a combination of; the need for change given the poor quality of the existing transport experience and the need to provide more capacity; the opportunity to deliver a significant number of new homes and jobs over the new station; and the profit delivered by the new development to fund the station works. The model is similar to that which has been so successful at Vauxhall, Nine Elms, Battersea and Kings Cross.

Alongside the strategic growth and investment in the transport network, there is an opportunity to deliver ‘good growth’ and ‘healthy streets’ for local people and communities, including an enhanced passenger experience, improved safety and access for all.

Innova is exploring the potential to develop a new station facility at Clapham Junction that would deliver substantial increases in station and rail service capacity, whilst providing improved integration with both local and wider transport networks. The aim is to address longstanding station, platform and rail capacity issues whilst optimising passenger connectivity and experience. The approach is complementary to the draft MTS (2017), which sets the tone for new policies around transport and development in the new London Plan.

To deliver a new integrated station at Clapham Junction necessitates the need to bring forward development on surrounding land and on a new development deck above the station that can provide critical funding towards the cost of the new interchange facility. Essentially, it is considered that the Clapham Junction Station site has the potential to deliver a strategic interchange hub to Southwest London, which would help to relieve congestion and connect the city with a wider range of destinations and networks. Local redevelopment of the site would provide a gateway between new development and the surrounding areas, stimulating regeneration, delivering employment and housing opportunities, providing local amenities, as well as improving day-to-day experiences for local people.

User: Innova Investment Partnership

The Transport Improvements

The Clapham Junction station opportunity could achieve the following transport aspirations through design, in accordance with the Mayor's Healthy Streets indicators, to accelerate the rate of modal shift away from car use and to help achieve the 80 per cent mode share target as defined in the draft London Plan (Policy T1) and the draft MTS (2017):

• Increased rail capacity – any proposed redevelopment could transform the rail capacity and passenger experience at the Station. A new 'future proofed' layout of the railway combined with flexible infrastructure could help enable longer and more frequent trains stopping at Clapham Junction station providing significantly more capacity for passengers.

The new station would have step free access. Straight platforms will mean the stepping distance between the train and platform would be significantly reduced helping persons with restricted mobility, improving safety for passengers, and reducing the 'dwell' time taken to dispatch the train from the platform.

• Pedestrian improvements and onward accessibility – any proposals would be designed with an intention to 'befit' the strategic interchange superhub status given to Clapham Junction in the draft MTS (2017). Specifically, in relation to new high quality station entrance points with step free access. There is the opportunity for straighter platforms to be wider and longer to provide increased capacity, and significantly improved passenger circulation with the ability to interchange.

There is the opportunity for a new station concourse which could provide a wide unpaid public route for significant interchange improvement between rail operators and surface transport modes on Grant Road to the north and St John's Hill to the south, as well as providing permeability to the immediate area. Any link could, through careful design, offer high quality public realm for local people, workers, station passengers and other users.

Any proposals could consider full integration with future potential services including Crossrail 2, to allow for direct and convenient connection. Any station interchange would be guided by the highest quality of design delivering optimum customer experience.

The development and station interchange proposals should be fully integrated with surrounding streets including future regeneration plans within the Latchmere ward to the north including onward connections with existing and future pedestrian links for access across the River Thames to/ from central London, as well as provision to local amenities and facilities to the east, south and west of the site.

• Cycle improvements and onward accessibility - the development and station re-modelling presents a huge opportunity to maximise cycling potential and cycle use in the sub-region. Opportunity exists for proposals to connect with existing and any planned cycle routes, including Cycle Superhighways and Quietways as appropriate, to create a new cycle grid. Essentially, this could allow for better efficient and safer cycle journeys to be made to/ from the station to the wider area.

Existing and new residents would benefit from a substantial increase in cycle parking facilities at the new station development, to be delivered in accordance with policy requirements in place of the current poor level of provision. The site provides an opportunity to expand the Mayor's cycle hire scheme as well as deliver innovative cycle hub facilities.

• Bus interchange improvements - any proposals would incorporate the Mayor's intentions for 'Low Emissions Bus Zones' by re-providing and substantially enhancing existing major bus provision in the form of a new high quality bus interchange facility. Existing and potential future onward travel patterns would be considered across a wider catchment area, to improve overall interchange operations and efficiency. Proposals could consider passive provision for future express / rapid transit style bus services, as well as aspirations for zero carbon and electric charging facilities for the new fleet of buses.

• Road network enhancements - the current road network is constrained by the railway line and ability to cross it due to congestion in the area. There is also undulating topography that any design needs to consider. Nevertheless there is an opportunity to rethink the existing road network in line with Healthy Streets aspirations and modal shift aims away from private car use, to relieve congestion and improve air quality in the area. Any improvements should prioritise pedestrian and cycle activity, as well as bus users supported by a strategy that aims to provide the minimum amount of car parking necessary to support development and respect the Mayor's objectives.

• Taxis and private hire - the station currently has limited taxi facilities. Notwithstanding this, the future of taxi service via mobile phones and open data mean that provision is driven by the end user. As such there is an opportunity to seek to provide high quality pick up and drop off facilities, in a manner which does not result in a vehicle dominant environment.

• Freight and deliveries - any scheme design should include a comprehensive consolidation strategy, to coordinated waste and recycling collection, timetabled deliveries, flexible loading bays and a wide range of other measures, in response to the Mayor’s aim to transform the design and layout of street space following the Healthy Street criterion.

User: Innova Investment Partnership

The Development Deck Opportunity

Innova has undertaken detailed technical work to test the feasibility of creating a development deck above the station that could accommodate a high density mixed use development that can both assist with the funding strategy to deliver the station and rail enhancements but also deliver much needed housing and job growth for London.

A summary of the technical work undertaken to date is appended to this representation in the "*Clapham Junction Station: The Opportunity*" report. This demonstrates that it is feasible to create a development deck above the reconfigured Clapham Junction station on which high density development can be delivered whilst not limiting the future operational capacity and function of the station and its rail services.

The initial design work has shown that a development deck of around 16 hectares can be created of new development land that can accommodate a range of new housing, office, retail, leisure and community infrastructure uses.

User: Innova Investment Partnership

Policies T1 and T3

Good Growth and Healthy Streets are at the heart of this draft London Plan, beyond the specific strategic emphasis placed on Opportunity areas and growth corridors. Development at Clapham Junction would make a substantial contribution towards achieving the objective of Policy T1 of exceeding the 80% target for all trips to be made by foot, cycle or public transport. The scheme, by transforming the public realm in and around the station, would meet the requirements of Policy T2 by delivering a new network of Healthy Streets for London.

Policy T3 is particularly relevant as it seeks to support proposals that improve national and international public transport connections. Table 10.1 that supports Policy T3 includes a wide range of transport schemes that are necessary to contribute towards providing increased capacity and connectivity at Clapham Junction. Whilst a number of selective transport projects are mentioned in in the sub text, at paragraphs 10.3.1-10.3.6 (e.g. Crossrail 2 and Bakerloo Line Extension), we would welcome more reference to the specific links between housing delivery and transport infrastructure and how this is related to the delivery of the overarching housing targets. In particular, we are of the opinion that there are other strategic rail projects, not just Crossrail 2 and the Bakerloo Line Extension, that are critical to achieving the delivery of Opportunity Areas and maximising housing numbers, that should also be specifically mentioned and explained. The need for comprehensive improvements at Clapham Junction, as one of London's strategic rail interchanges, is a good example.

Viability Assessment of the Draft London Plan

Innova is concerned about the cumulative impact of the draft policies on development viability – which make development, especially in Opportunity Areas and for complicated strategic projects such as Clapham Junction Station, more challenging to deliver. Innova urges the GLA to properly test the actual costs associated with meeting specific policy requirements on development viability.

Innova has reviewed the viability assessment of the Draft London Plan and is concerned that the effect of several new policies has not been tested. Policies associated with, for example, low cost business space, affordable workspace, air quality positive, urban greening, zero carbon etc all need to be fully taken into account. The cumulative impact of policies, such as these, could have a very significant bearing on the ability for strategic projects like Clapham Junction to be able to deliver other public benefits – namely critical transport infrastructure improvements and affordable housing. There is a need therefore for the London Plan to provide flexibility for developments, on a case by case basis and where evidenced and justified, to prioritise meeting certain policy objectives over others.

User:	London Borough of Camden

Camden supports the objectives of Policy T3 to increase public transport capacity and improve connectivity, which are vital for London's success. This also help to ensure that all Londoners can benefit from the capital's opportunities. Buses are the most accessible mode of transport and are therefore essential for people with a disability as well as older people who depend on them. They are also generally a more affordable option compared to rail services, and are often the only means of travel for shift workers such as those working in the night time economy. While we note the Mayor's intention to reduce bus services in Central London in order to improve provision in outer lying areas, we urge the Mayor to ensure that bus provision in Central London remains at levels that support and improve accessibility, particularly among more vulnerable and disadvantaged groups.

Criterion D should also refer to the comprehensive development of Euston Station as a co-ordinated world class sustainable transport interchange in the list of priority transport development decisions.

User:	London Borough of Camden

In the Indicative List of Transport Schemes, the item on HS2 should be amended to read ‘HS2 and associated National Rail changes, including ensuring sustainable construction and mitigation of impacts at street level’.

The timescale for HS2 is currently 2017-2033, rather than the 2020-2041 given in the table.

User:	London Borough of Camden

This paragraph should state that Crossrail 2 needs to be completed prior to the opening of HS2 Phase 2 in 2033 to ensure Euston Station has sufficient capacity for passenger interchange.

User:	Battersea Project Land Company Limited

Walking and Cycling
4. BPS welcomes Policy T3, including the aspiration to protect and improve the Thames Path.

Public Transport
Buses
5. Policy T3 states that development proposals should support capacity, connectivity and other improvements to the bus network to ensure it can operate efficiently. BPS welcome the emphasis on ensuring bus capacity and connectivity aligns with new development proposals and looks forward to discussions with TfL regarding bus access and service arrangements for the BPS development following completion of the NLE in 2020.

User:	Battersea Project Land Company Limited

London Overground

6. Various London Overground extensions are noted in Table 10.1 as part of an indicative list of transport schemes. BPS would strongly support extensions and increased capacity on the London Overground network, and particularly on the South London Line.

7. BPS has previously presented TfL with an effective and low-cost option for extending London Overground services on the South London Line to a secondary terminating point (in addition to Clapham Junction) at Battersea Park Station. This is shown to deliver significant additional connectivity between Battersea and a range of South London destinations resulting in significant journey time improvements and is supported in principle by the London Borough of Wandsworth. BPS would welcome further discussion with the Mayor regarding this opportunity and the potential benefits it could bring. A summary of this proposal is provided in Appendix A.

RECOMMENDATION: Adopt extension of the London Overground network to Battersea Park Station as a committed transport scheme.

User:	Network Rail

Table 10.1, page 409 – There is a severe lack of information on Network Rail projects on this list. Specific reference should be made to development at stations, including the comprehensive development at stations, which include essential infrastructure investment and development, both of which are key to unlocking gowth potential and effective delivery of the Plan. Network Rail requests further discussions with you on populating this table.

Table 10.1, page 409 – It is suggested that the ‘Heathrow Airport Southern Access’ schemes should be reclassified from a medium to high cost scheme.

Table 10.1, page 409 – The proposed scheme ‘Devolved suburban rail services to enable London suburban metro’ does not refer to any infrastructure interventions that point to a high cost scheme. It would be helpful if this was more clearly described.

Policy T4 Assessing and mitigating transport impacts

User:	Levitt Bernstein

F. Development proposals should improve road danger, not maintain the status quo. Public realm proposals should seek to mitigate road accidents – the close collaboration between architects, urban designers, landscape architects and transport consultants therefore becomes increasingly important.

User:	Levitt Bernstein
To include at the end of paragraph: *such as Green Infrastructure (G.I.)*	

User: London Sustainability Exchange

T4 Assessing and mitigating transport impacts

Supporting text:

10.4.3 It is important that development proposals reduce the negative impact of development on the transport network and reduce potentially harmful public health impacts. The biggest transport-related impact of development on public health in London is the extent to which it enables physical activity from walking, cycling and using public transport. The other main impacts on public health relate to air quality, road danger, noise, and severance. The phasing of development, and the use of travel plans and freight strategies, may help reduce negative impacts and bring about positive outcomes. Where adverse transport impacts have been identified from development proposals, mitigation will be sought in the form of financial contributions – to improve network service levels for example – or through directly providing infrastructure such as additional bus stops and street improvements, or pollution mitigation infrastructure.

LSx comments on T4

- How does the policy ensure that this (10.4.3) will actually happen?

User:	London Forum of Amenity and Civic Societies

Policy T4 D: Line 5: “may” should be replaced by “will”.

Add ‘implementation of approved schemes should be phased according to transport improvements in capacity.’

Policy T4 E. Line 3: the final word “mitigate” should be replaced by ‘fully addressed’.

In **paragraph 10.4.3** add, near to the end, the words ‘routes and’ before “stops”.

User: Alan Simpson

The plan seeks to further restrict car parking in new development and to reframe the link to PTAL. Allowing excessive car parking in Policy T4 is inconsistent with the main transport policies which seek to reduce car trips. **Proposed changes:**

- The following amendments should be made to Policy T4(C) – ‘Where appropriate’ should be deleted and Policy T4(D) should be changed to read “..planning permission may **will** be contingent on the provision of necessary public transport and active travel infrastructure.”
- Table 10.3 - The bottom four rows should be amended so that the maximum parking provision in a development in any area (whatever the PTAL) is 0.3 spaces per unit.
- Paragraph 10.4.4 – the word ‘Ideally’ should be deleted and the sentence reworded as follows: “Ideally New development **of all sizes, but in particular** that **which** will give rise to significant numbers of new trips**,** should be located in places well-connected with public transport…”
- Policy T6 H: should be amended to read “Boroughs wishing to adopt borough-wide or other area-based car-free policies will be supported. *[Delete the outer London caveat sentences.]* Minimum standards are not appropriate for **residential or** non-residential land uses in any part of London.”

User:	Arcadis LLP

We note that T4 D states that planning permission may depend on provision of necessary Public Transport / active transport infrastructure to cope with additional demand and ask whether one acceptable option might be for developers to make a commitment to provide and fund the creation, operation and maintenance of new privately operated public transport services (subject to licence) to satisfy this forecast demand and meet planning requirements?

User: Adrian Cowie

The plan seeks to further restrict car parking in new development and to reframe the link to PTAL. Allowing excessive car parking in Policy T4 is inconsistent with the main transport policies which seek to reduce car trips. **Proposed changes:**

- The following amendments should be made to Policy T4(C) – 'Where appropriate' should be deleted and Policy T4(D) should be changed to read "..planning permission may **will** be contingent on the provision of necessary public transport and active travel infrastructure."
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User: Paul Stansfield

The plan seeks to further restrict car parking in new development and to reframe the link to PTAL. Allowing excessive car parking in Policy T4 is inconsistent with the main transport policies which seek to reduce car trips. **Proposed changes:**

- The following amendments should be made to Policy T4(C) – 'Where appropriate' should be deleted and Policy T4(D) should be changed to read "..planning permission may**will** be contingent on the provision of necessary public transport and active travel infrastructure."
- Table 10.3 - The bottom four rows should be amended so that the maximum parking provision in a development in any area (whatever the PTAL) is 0.3 spaces per unit.
- Paragraph 10.4.4 – the word 'Ideally' should be deleted and the sentence reworded as follows: "Ideally New development **of all sizes,but in particular** that **which** will give rise to significant numbers of new trips**,** should be located in places well-connected with public transport…"
- Policy T6 H: should be amended to read "Boroughs wishing to adopt borough-wide or other area-based car-free policies will be supported. *[Delete the outer London caveat sentences.]* Minimum standards are not appropriate for **residential or** non-residential land uses in any part of London."

User: Dr Leslie Clark

The plan seeks to further restrict car parking in new development and to reframe the link to PTAL. Allowing excessive car parking in Policy T4 is inconsistent with the main transport policies which seek to reduce car trips. Proposed changes:

* The following amendments should be made to Policy T4(C) – ‘Where appropriate’ should be deleted and Policy T4(D) should be changed to read “..planning permission [DEL: may :DEL] will be contingent on the provision of necessary public transport and active travel infrastructure.”

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* Paragraph 10.4.4 – the word ‘Ideally’ should be deleted and the sentence reworded as follows: “[DEL: Ideally :DEL] New development of all sizes, but in particular that which will give rise to significant numbers of new trips,should be located in places well-connected with public transport…”

User: Publica

We support the delivery of further cycle routes, however all proposed routes must form part of a network of active travel routes throughout London. The Dutch Design Manual for Bicycle Traffic defines five key elements in creating a network: cohesion, directness, safety, comfort and attractiveness. These same factors are reflected in the London Cycling Design Standards and should form the basis for any works. There is, however, the need for consistency in their application across schemes and a joined up holistic strategy should guide delivery of schemes across London.
The adoption of an ‘eight to 80’ model of suitability would be beneficial in delivering a consistent standard of interventions across London. This would mean that all schemes provide an inclusive walking and cycling environment that is suitable to all users between the ages of eight and 80 years old.

Networks should be created that take in key routes to schools and areas designated as town centres, so that the concepts of walking or travelling by bicycle are instilled as viable transport options from an early age and active travel is built into the everyday routine.

The point at which to introduce different levels of public realm intervention would also benefit from a standardised approach. A matrix, that correlates place function and traffic volume could be developed in this regard based around one recommendation frequently made by the London Cycling Campaign (LCC), amongst others, and used in Holland, the adoption of the 2000pcu tipping point at which bicycle and motor vehicle traffic become segregated by time or space.

Publica welcomes the reallocation of space from uses such as on-street parking to cycle parking. We suggest that this could be strengthened by a mechanism through which local authorities can simply and efficiently reallocate on-street space from low volume (motor vehicle) to high volume (cycle) parking and a target quota based on TfL's data for journey potential.

User: Home Builders Federation

Part C and E of the policy are unsound because they propose things that are contrary to the CIL Regulations and national policy.

Part C states that mitigation could be achieved in part through financial contributions. We recommend that the policy is re-worded in order not to confuse the distinct roles of S106 obligations and the Community Infrastructure Levy (CIL). If money is paid through a CIL towards transport items in a Regulation 123 list, then the applicant cannot lawfully make separate financial contributions to these items. Part C should distinguish between the S106 and CIL. It would be sensible to pay for the cumulative impacts on public transport through a CIL. The draft London Plan should encourage this.

Similarly Part E is misguided in requiring applicants to address wider public transport and public health impacts. These are objectives that are legitimate to pursue through a CIL but not through S106 obligations.

Parts C and E should be deleted.

User: Camden Conservatives

ASSESSING AND MITIGATING TRANSPORT IMPACTS: POLICY T4

35. Traffic associated with the school run is a significant problem in Camden, particularly in NW3 where there is the highest concentration of schools in Europe. Numbers of children living in Hampstead of school age at the time of the 2011 census was 1,396 but in 2007 there were 9.868 children attended local schools, and by 2017 this number had increased to 12,659 (a 28% increase). This does not just result in congestion, but also has a serious impact on air quality. In 2017 Camden Air Action carried out a detailed study1 that reported that at least at least 80% of Camden school children are breathing illegal air.

36. Camden's Local Plan has gone some way towards ensuring that the problem does not worsen, stating that it will "refuse applications for new schools or the expansion of existing schools in these areas, unless it can be demonstrated the number of traffic movements will not increase." However, the London Plan is entirely silent on this important issue. We suggest that the London Plan should adopt the wording used in the Camden Local Plan within Policy T4, with the following additional requirements:

(1) All applications for new or expanded schools should include an Air Quality Assessment demonstrating the impact on air quality (Draft London Plan policy SI1 requires this for "major development". Given the cumulative effect of traffic
1 Camden Air Action's reports and analysis can be found at https://camdenairaction.wordpress.com/2017/02/20/schools-monitoring-project-spring-2017/
and air quality impacts arising from school development, this requirement should be extended to school-related applications).

(2) There is a concern that applications may be submitted which demonstrate that traffic movements will not increase, but that this will be based on travel plans and mitigation measures which are either not carried out or result in the actual levels of traffic movements being underestimated at the planning application stage. Policy T4 should therefore state that where planning permission is granted for new school development, on the basis that the number of traffic movements will not increase, a planning condition should be imposed limiting the number of movements to those specified in the application. If this is exceeded, the local authority will be able to take enforcement action. The condition should include a self-reporting requirement, requiring schools to report to the local authority specifying the number of children who travel to school by car.
Andrew Parkinson

User: Royal Borough of Kensington and Chelsea

10.4 Policy T4 Assessing and mitigating transport impacts

The Council agrees that the transport impacts of development proposals should be thoroughly assessed (Part B) and duly mitigated (Part C). We recommend that the words "where appropriate" be removed from the wording of Part C. In our view they are superfluous and risks undermining the clarity of the policy. If adverse transport impacts are identified these should be properly mitigated. Clearly if no such impacts are identified, mitigation will not be required.

The requirement that development proposals should not increase road danger (Part F) is incontrovertible. However, we consider that development proposals should all be required to incorporate measures to reduce road danger in circumstances where opportunities to improve road safety can be reasonably related to the development. This would be consistent with the Mayor’s Vision Zero approach to road danger reduction. The wording of the plan should be modified accordingly.

User: Motorcycle Industry Association

SUMMARY

All transport and infrastructure strategies for London should consider PTW users as a distinct client group. The UK's one and a half million regular PTW users are frequently neglected or forgotten when formulating urban planning and transport policy, despite their status as a group affected by these policy areas. PTWs, particularly the growing electric PTW (ePTW) market, can play a significant role in assisting the Greater London Authority to achieve its stated targets for lower-emission vehicles and its ambitions for London in terms of congestion, decarbonization and road safety.

In order to achieve this goal, we seek the following actions:

• PTWs to be recognised along with walking, cycling and public transport as a low-pollution and congestion-busting alternative to car and van use. While an increase in the number of electric cars in London will do nothing to reduce congestion or wear and tear on London's roads and infrastructure, encouraging the use of ePTWs offers an efficient solution to both congestion and air pollution.

• The market for commuter PTWs in London, which has been growing steadily for the last five years, to be supported through acceptance of PTWs into general transport policy, including a further expansion of access to bus lanes at borough level.

• Recognition that a 25% modal shift among commuters from car to PTW use would significantly lower or even eliminate congestion (see point 18 below). This shift would require provision for secure motorcycle and scooter parking in central London to be expanded by 205,000 spaces.

• Since motorcycles contribute extremely little to the amount of air pollution produced by transport, and since newer models will come with lower limits on pollutant emissions, any ULEZ or ZEZ which levies an entry charge on PTWs should offer incentives for newer vehicles, in order to encourage a switch towards these newer low-emission models. These incentives could take the form of a scrappage scheme for older/ICE PTWs, or increased subsidies for those wishing to upgrade their vehicles. These schemes could be funded through a proportionate share of the £13m made available in 2015-2020 through London's Go Ultra Low City Scheme bid to encourage the uptake of ULEVs in London.

• An on-street scooter-sharing scheme for London to be implemented, based on those successfully developed in other major European cities including Paris and Brussels.

• The recently-launched delivery scheme in the City of London to help businesses tackle air pollution by shifting deliveries from diesel vans to cargo bicycles to consider including ePTWs, which have the same eco-friendly advantages while offering greater speed and carrying capacity.

• TfL's Urban Motorcycle Design Handbook to be used in the development of road safety policy.

• The roll-out of charging points for electric vehicles to include provision for ePTWs at all residential and commercial developments.

INTRODUCTION

1. In general, the MCIA would urge that all transport and infrastructure strategies for London be required to make provision for, or at least consider, PTW users as a distinct client group. The UK's one and a half million regular PTW users are frequently neglected or forgotten when formulating urban planning and transport policy, despite their status as a group affected by these policy areas. The neglect of PTWs also overlooks the potential role PTWs can play in contributing to the Mayor's plans, targets and ambitions for London in terms of congestion, decarbonization and road safety, as outlined in Policy T1 and T2 as well as elsewhere in the Draft New London Plan.

2. The current Draft New London Plan refers to PTWs only in the context of motorcycle parking (p.422), and otherwise omits them entirely. The emphasis placed in the Draft New London Plan, and in the Mayor's Transport Strategy, on rebalancing London's transport system from car use towards walking, cycling and public transport, is admirable but, again, erases or overlooks PTW use.

3. Conversely, the MCIA is keen for PTWs to be recognised as vehicles that can be grouped along with cycling and public transport as a low-pollution and congestion-busting alternative to car and van use – particularly in view of the developing market for electric PTWs.

4. This submission therefore outlines opportunities to constructively integrate PTWs into London's transport and infrastructure policy, and the social, environmental and economic benefits this would generate.

GROWTH AND POTENTIAL OF THE LOW-EMISSION EPTW MARKET

5. The UK market for electrically powered two-wheeled vehicles (ePTWs) has great potential. Although new registrations of road-going machines have been limited by low product availability, major PTW manufacturers are now in the process of announcing new products for market release, which should increase uptake. Research and development on ePTWs is also gaining momentum and is viewed as a key part of the industry's future.

6. An increase in the proportion of ePTWs within the national fleet would reduce overall emissions in terms of CO2 and other pollutants. In turn, this would help London meet its targets in reducing CO2 emissions and significantly improving air quality.

7. The UK market for commuter PTWs has been growing steadily for the last five yearsii. ePTWs will form a significant part of this market provided effective support is offered to encourage it to grow, including through making the UK market more attractive to manufacturers. By contrast with the UK electric car market, the ePTW market will need support in order to gain sustained market traction. This in turn will encourage manufacturers to place more quality product at a volume, and therefore price point, comparable to ICE product.

8. This support should include acceptance of the PTW into general transport policy, including a further expansion of access to bus lanes at borough level. Additionally, additional funding could be aimed at ePTW research and development in London to encourage new and innovative two-wheeled product.

9. ePTWs have the advantage of being able to charge via any 3-pin domestic outlet. Increasingly, PTWs are supplied with 'cartridge' style batteries that can be swapped at home or work, which is ideal for those without off street parking or those who live in flats (whilst also increasing the security of the vehicle). This offers significant benefit as charging infrastructure is not a pre-requisite.

10. However, we note the efforts made and the range of grant schemes available to support the installation of charging infrastructure on-street, off-street and at workplaces, and the Chancellor's announcement in Autumn 2017 of a new £400m electric vehicle Charging Infrastructure Investment Fund. We would argue that the roll-out of charging points for electric vehicles should include provision for ePTWs at all residential and commercial developments.

11. We note that the city of Paris, in addition to a subsidy scheme for the purchase of electric motorcycles, is building terminals to recharge these vehicles for free. Many European cities, such as Brusselsiii and including Parisiv, have an on-street scooter sharing scheme available for public use.

CHANGING FREIGHT AND DELIVERY LOGISTICS

12. As noted in the Draft New London Plan (p.88, p.100, p.258), the ongoing development and restructuring of London's professional and retail spaces has necessitated changes in the logistics of freight and deliveries, in order to develop more creative solutions for efficient and non-disruptive transport of goods to workplaces, homes and pick-up points.

13. The Draft New London Plan's commitment to working with transport partners to promote "efficient and sustainable essential freight functions, including by road, rail, water and, for shorter distances, bicycle" (p.404) is another objective with which PTWs have the potential to assist.

14. London has an established tradition and infrastructure based around deliveries by motorcycle courier, which could be expanded to help manage the growth in short-distance deliveries within London to and between workplaces and homes. The use of zero-emission ePTWs for this purpose would, as outlined below, also have a beneficial effect on air quality.

15. We note the launch in January 2018 of a new delivery scheme in the City of London to help businesses tackle toxic air pollution by shifting deliveries from diesel vans to cargo bicyclesv. We would suggest that ePTWs, which have the same eco-friendly advantages and often greater carrying capacity, could usefully bridge the gap between cargo bikes and vans, playing a complementary role to cargo bikes in this transition.

EPTWS AS A SOLUTION TO URBAN CONGESTION

16. The number of electric cars in London has grown significantly in the last five years, with 10,000 electric cars registered in London – ten times as many as in 2012. A clear benefit of electric cars is the production of no emissions at the point of use, which will assist with improving urban air-quality. However, electric cars will do nothing to reduce congestion or wear and tear on UK roads and infrastructure. In fact, offering incentives for electric vehicle use in urban centres – such as the Central London Charging Zone – may result in congestion returning to its previous pre-charge levels.

17. Encouraging the use of ePTWs, on the other hand, offers an efficient solution to both congestion and air pollution.

18. We note the Draft New London Plan’s identification of a shift from car use to more spaceefficient travel as the only long-term solution to London’s congestion problems (p.402) and would argue that this modal shift should include lower-polluting and zero-emission PTWs alongside other alternatives to car use. • Motorcycles can, in most cases, avoid or extricate themselves from congestion. The ability of motorcycles to gain time against rush-hour traffic jams is attested to in several studiesvi.

• While a gridlocked car – even when carrying four passengers – returns zero miles to the gallon, PTWs are not forced to remain stationary in grid-locked traffic with an idling engine.

• In particular, the practice of “filtering” – which allows motorcycles to move between lanes of slow or stationary traffic – eases congestion for all road users, not just the PTW rider, while also resulting in lower accident rates for motorcyclists than remaining stopped in trafficvii.

• A 2011 study by Transport and Mobility Leuvenviii showed that a modal shift of 10% from private cars to PTWs reduced lost vehicle hours in congestion on a trunk road by 63% for everybody using that route (i.e. not just PTW riders). A modal shift of 25% (one quarter of all cars replaced by PTW) eliminated congestion altogether.

We offer the following considerations in support of this argument:

• If the shift identified by TM Leuven were applied to London, this would require a switch from car to PTW use by around 205,000 commuters.ix

• A second study, published in 2011 by Pierre Koppx, showed that an 36% increase in PTW traffic in Paris between 2000 and 2007 accounted for a net benefit of €168 million besides reducing congestion to the people of Paris.

• In many major cities, particularly in Asia and Latin America, a very high rate of motorcycle use has arisen as a means of beating traffic congestion among other economic and cultural reasons. In these cases, it has been observed that even in intensely motorcycle-dependent environments like Ho Chi Minh City, which has 7.5 million people and nearly five million motorcycles, a high rate of traffic flow is still possible even at peak travel times.xi

19. Measures to increase the use of other alternative modes (cycling, walking, public transport) would require significant changes to current infrastructure, such as the building of new bus or cycle lanes, therefore incurring a high level of cost and disruption to communities and businesses. An increase in the use of motorcycles, by contrast, would involve minimal or no infrastructure changes and incur minimal cost or disruption.

20. It would therefore seem prudent to encourage drivers, and particularly commuters, to switch to motorcycle use and particularly to electric motorcycles using financial and/or other incentives.

PTWS AND AIR QUALITY

21. We note the Mayor's proposals, reiterated in the Draft New London Plan, to expand the UltraLow Emission Zone in which all vehicles that do not meet emission standards will be liable to pay a daily charge, with PTWs included in this charge alongside cars and vans.

22. We would like it to be recognized that, as has been noted in several studiesxii, motorcycles contribute extremely little to the amount of air pollution produced by transport. The draft air quality control plan proposed by DEFRA in May 2017 itself noted this point.xiii

23. The phasing out of older models of motorcycle and production of newer models, which have tighter regulations on emissions control and tougher testing regimes, has the potential to reduce this contribution even further. As outlined above, an increase in the proportion of ePTWs within the national fleet would also reduce overall emissions of CO2 and other pollutants.

24. Since motorcycling is not a critical source of air pollution, and since newer models will come with lower limits on pollutant emissions, any scheme that levies an entry charge on PTWs should at least offer incentives for newer vehicles, in order to encourage a switch towards these newer lowemission models. Such incentives could take the form of a scrappage scheme for older/ICE PTWs, or of offering increased subsidies for those wishing to upgrade their vehicles.

25. The MCIA will be submitting a separate response to Transport for London's consultation on changes to London's Ultra-Low Emission Zone and Low Emission Zone, which will expand on the above points.

ROAD SAFETY

26. The PTW industry has always and continues to prioritise road safety and the MCIA has been working with Transport for London to increase road safety for many years. It is evident that the increasing use of automation by car drivers – specifically, of current advanced driver-assistance systems (ADAS) – can pose a significant, if unintentional, danger to PTW and other vulnerable road users. We therefore welcome the Mayor's Vision Zero strategy to reduce deaths and serious injuries on London's streets.

27. The MCIA would, in particular, promote the further usage of TfL's Urban Motorcycle Design Handbookxiv.

PARKING

28. We note the Draft New London Plan's specific mention of motorcycling on p.422 regarding parking provision: "Motorcycle parking will be evaluated on a case-by-case basis. Where provided, each motorcycle parking space should count towards the maximum for car parking spaces at all land uses."

29. We would further note that there is an urgent need for additional on-street secure motorcycle and scooter parking in central urban areas.

30. Points 18-20 above outline the improvements to congestion which could be generated by a modal shift from car to PTW use among commuters. Any such shift – ideally to a situation where 25% of vehicles used to commute into London are PTWs – would require a proportionate increase in the number of parking spaces available for PTWs. We estimate the number of extra parking spaces required to be around 205,000. Building these extra spaces would incur less cost and disruption than the building of new train or tube infrastructure to cope with increased numbers of commuters.

31. We would further suggest that, where parking provision is made for ePTWs, this should be targeted at transport hubs such as stations and airports (as recommended in the IHE guidelines on motorcycle infrastructure)xv.

CONCLUSION

32. PTWs, and particularly the growing market of ePTWs, can play a significant role in assisting the Mayor's Office and Greater London Authority to achieve its stated targets for lower-emission vehicles, as well as furthering air quality control and other environmental strategies.

33. In addition to this, PTWs offer a unique opportunity to reduce congestion, in contrast to zeroemission cars. It is therefore important that the motorcycle industry forms part of both thinking and developments in this policy area.

The MCIA, in particular its Chief Executive, would be happy to answer further questions on any of the points made above.

i https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/download-draft-londonplan-0 ii http://www.mcia.co.uk/sub/pocket-guides iii https://scootysharing.be/

iv http://www.cityscoot.eu/paris/?lang=en v https://www.businessgreen.com/bg/news/3023910/city-of-london-launches-cargo-bike-deliveries-to-slashair-pollution

vi See Estupian et al, 'Motorcycle ownership and use: The case of Latin America', accessed 07.12.06, http://www.academia.edu/3856834/Motorcycle_ownership_and_use_The_case_of_Latin_America_Nicolas_E stupinan_et_al vii See EU Motorcycle Accident In-depth Study (MAIDS) Final Report (2009), http://www.maidsstudy.eu/pdf/MAIDS2.pdf

viii See

http://www.tmleuven.com/project/motorcyclesandcommuting/20110921_Motorfietsen_eindrapport_Eng.pdf ix See https://londondatastore-upload.s3.amazonaws.com/Zho%3Dttw-flows.pdf x See https://www.pierrekopp.com/downloads/2011%20The%20unpredicted%20rise.pdf

1. xi See Hanlon, 'New research indicates motorcycle commuting reduces traffic congestion and emissions', *New Atlas*, February 13, 2012
2. xii See ICCT, "Managing Motorcycles: Opportunities to Reduce Pollution and Fuel Use from Two- and ThreeWheeled Vehicles" (October 2009), at

http://www.theicct.org/sites/default/files/publications/managing_motorcycles.pdf and Christian Hilber and Charles Palmer,"Urban development and air pollution: Evidence from a global panel of cities" (December

2014) http://www.lse.ac.uk/GranthamInstitute/wp-content/uploads/2014/12/Working-Paper-175-HilberPalmer-2014.pdf

xiii See p.7, https://consult.defra.gov.uk/airquality/air-quality-plan-for-tackling-nitrogendioxide/supporting_documents/Consultation%20Document.pdf xiv http://content.tfl.gov.uk/tfl-urban-motorcycle-design-handbook.pdf xv http://www.motorcycleguidelines.org.uk/

User: Battersea Society Planning Comittee

Policy T3 Transport capacity, connectivity and safeguarding

We consider the policies in the draft London plan fail to adequately recognise the pressure on both the public transport system and on key roads into central London. We expressed major reservations in response to TfL's Transport Plan for London. The latter has to provide the strategic framework for the London plan.

As indicated throughout this response we do not believe that there is a coherent integrated approach to transport planning demonstrated by the individual approval of high density development in the corridor from Lambeth Bridge through to Wandsworth Town. Repeatedly there is over reliance on the capacity of Clapham Junction, overground rail and existing bus route which at peak times are grossly overloaded.

We consider therefore that **Policy T4 E- requiring assessment of cumulative effects** should be an absolute requirement for each new development with continual reassessment of impact as developments are built and occupied.

User: London Borough of Islington

Draft London Plan Policy

Policy T4 – Assessing and mitigating transport impacts

Islington Response

Transport for London used in the preparation of TfL's guidance, the Department for Transport (DfT) guidance document on the transport assessment process for local authorities and developers (2007). This document references in appendix B the indicative thresholds for the preparation of Transport Assessments. Islington currently applies lower thresholds for some land uses than those contained in the DfT guidance document. Specifically, A3 restaurant, C1 hotels and C3 residential have lower thresholds for Transport Assessment in Islington. It is noted that TfL suggests the use of this guidance but sometimes a greater level of analysis is necessary. We consider that local approaches to Transport Assessments could also be supported where appropriate.

User: Port of London Authority

The PLA welcomes the reference to travel plans and construction logistics plans in policy T4. It should be stated as part of the reasoned justification that where relevant (i.e. in close proximity to the River) these documents should give specific consideration to water transport and seek to maximise the role that the river can play in terms of passenger transport and the transportation of construction and waste materials to and from development sites. Where opportunities are identified in the documents, appropriate commitments must be made to river use at an early stage. The PLA recommend the following amendments to the reasoned justification:

Suggested amendments to reasoned justification at paragraph 10.4.3:

“It is important that development proposals reduce the negative impact of development on the transport network and reduce potentially harmful public health impacts. The biggest transport-related impact of development on public health in London is the extent to which it enables physical activity from walking, cycling and using public transport. The other main impacts on public health relate to air quality, road danger, noise, and severance. The phasing of development, and the use of travel plans and freight

strategies, may help reduce negative impacts and bring about positive outcomes. ***Alternative forms of sustainable transport, such as river transport must form part of the consideration for development proposals to reduce the negative impact of development on the transport network****. Where adverse transport impacts have been identified from development proposals, mitigation will be sought in the form of financial contributions – to improve network service levels for example – or through directly providing infrastructure such as additional bus stops and street improvements."*

User: Association of Consultancy & Engineering

The Mayor’s approach to assessing and mitigating transport impacts from development plans and proposals is positive. ACE supports the requirement for transport assessment to be included with planning applications to ensure developments are being assessed for their transport impacts and to ensure they are contributing to the Mayor’s healthy streets approach.

One area of concern we have is a lack of clarity over how this policy works if there is a gap between the completion of the development and a planned transport connection. We recommend the Mayor provides further clarity on the circumstances a transport assessment for a development will be approved when planned transport connections are some way off completion. ACE believes this is an important addition to this policy due to the adverse impact delays in the delivery of transport schemes can have on the delivery of other schemes such as housing.

User:	Wheels for Wellbeing

9.1 We strongly support the Mayor’s plans to improve air quality in London, which requires urgent action. Encouraging and supporting more disabled people to cycle will help in this regard, particularly when it is considered that disabled people otherwise tend to be more reliant for day-to-day travel on driving or being driven, either by door-to-door services, such as community transport services, or by taxis and private car hire.

User: London Borough of Barnet

These policies seek to ensure provision of sufficient suitably located land for current and expanded public and active transport system. Safeguarding existing land and buildings used for transport or support functions It is necessary to recognise and give due consideration to existing physical constraints at a local level. The Brent Cross development proposals and Colindale CPO for over station development involve significant physical challenges. Golders Green also has potential issues regarding height and density of proposals.

Safeguarding route alignments 1) West London Orbital/ Dudding Hill Line The West London Orbital is included in the draft MTS as a possible route to be reopened and the DLP commits the Mayor, TfL and relevant London boroughs to involvement in a feasibility study for the scheme (MTS proposal 83, p. 209). Connecting a number of regeneration areas including Brent Cross, OPDC and the Great West Corridor, this line has the potential to unlock c20,000 new homes across the sub-region. We want this route to be reopened in order to support sustainable and convenient orbital movements and town centre growth and reduce demand on the North Circular. At present, options for a route to Cricklewood or northwards via Brent Cross are being tested for initial feasibility by the West London Alliance and commitment towards this scheme from the Mayor should be tightened with more detailed reference to West London Orbital provided in the final Plan. Barnet considers that the programme for the London Overground Extensions 2030-41 is not of sufficiently high priority and therefore request a commitment to earlier delivery of West London Orbital as a critical piece of infrastructure by the mid to late 2020s. 2) Crossrail2 The inclusion of New Southgate station in the draft MTS as a station on Crossrail 2 is positive for Barnet. Crossrail 2 can play a key role in unlocking further growth in eastern Barnet and support reduced car-dependency development within certain ward areas of Barnet. However, the draft MTS and Implementation Plan insufficiently clarify the phases by which branches such as New Southgate to Seven Sisters are to be delivered. While the Council recognises the need for effective and responsible financial management of Crossrail 2, it will be of great benefit to Barnet if the New Southgate extension is speedily delivered. At the very least, the final London Plan should give greater indication as to the phases and dates by which specific parts of Crossrail 2 are expected to be delivered. Safeguarding the Walk London network Barnet supports this initiative, particularly with regards to Outer London routes and the orbital path. Upgrades to Underground Lines More detail is required on what this will entail for lines within Barnet. However, the London Underground Station Capacity Programme (2017-40) is strongly supported with regards to the Piccadilly Line and Northern Line and the introduction of capacity upgrades as soon as these can be practicably brought forward. Barnet also welcomes the recent announcement on Step Free access for Burnt Oak. The programme should also include review of Step free Access for Mill Hill East/Colindale/Brent Cross/Arnos Grove via developer contributions and as part of the Stations Upgrade programme. Further details are required on proposals for the Night Tube. Indicative List of Transport Schemes It is noted that there is an intention to reallocate bus capacity from Central to Outer London and that bus network enhancements are also included as a medium priority within the DLP. The bus network will be crucial for Barnet in achieving mode share targets. Improvement of orbital routes is especially important, and while this is acknowledged in the DLP, further detail is needed on proposals to reallocate bus capacity and specific strategies required to address the challenge of orbital routes in Outer London. Barnet supports devolved suburban rail services to enable London suburban metro with regards to the Moorgate Branch through Oakleigh Park. We also strongly support devolution of the rail line to TfL to improve frequencies /services. The inclusion of Crossrail 2 (2020-2040) and Thameslink (2017-2020) with high priority status is welcomed. The Brent Cross Cricklewood development is Barnet’s most significant growth and regeneration programme and is underpinned by the construction of a new Thameslink railway station, delivered by the Council with Network Rail, which will provide a link to King’s Cross St Pancras in under 15 minutes. Barnet is seeking to bring forward the delivery of the new Thameslink Station and associated works within the

Brent Cross/ Cricklewood planning permission, to deliver the new station in 2022, as compared to 2031. To do so the applicant is proposing to establish two new Thameslink sub-phases within the existing planning permission. While we accept that electric vehicle usage is becoming more wide spread, we would like to see the provision for charging infrastructure implemented in line with demand in Barnet, not London as a whole. This is due to existing demands on kerb space within the Borough. Policy T4 specifies circumstances whereby financial contributions should be sought to address adverse transport impacts and direct provision of public transport, walking and cycling facilities. It also recognises that there may be circumstances where additional public transport and active travel infrastructure may need to be provided. This could include additional bus stops and on street improvements. We would welcome additional information in the London Plan on how this process is envisaged to operate under the current system and Development Management guidelines. This section mentions a wide range of assessments which need to be considered for future development impacts on the surrounding highway and its users. We are concerned that no assessment on the impact on parking stress has been made. This is a key issue for Barnet should the reduction in parking provision associated with this document be progressed. “Development proposals should not increase road danger.” This is welcomed; however, it would be beneficial for all highway users if this section of the policy is expanded to cover improvement of existing issues of road safety on the immediately surrounding highway.

User: WSP

The constitution of this policy remains broadly as is set out in the adopted London Plan. Part A discusses the phasing of development to integrate with current and planned transport infrastructure. Part D then goes on to say that planning permission may be contingent upon provision of public transport improvements or active travel infrastructure (e.g. use of Grampian conditions). As highlighted in earlier comments in respect of Policy D6, without a clear level of commitment to funding these projects, or indeed more specific methodologies around how development can be phased, as this requires application of a complex set of land use and land value assumptions.

We will be discussing further elements of the assessment criteria and TA Best practice guidance directly with TfL to ensure that there is clear guidance on how the key parts of this policy are to be implemented. In particular we note the different travel patterns and use of Apps' to plan journeys. These mobile and 'Open Data' sources should become more widely used in assessing the impact of development and managing future impacts on the network. The Draft lack a real emphasis on a rapidly changing environment.

User: British Land

Assessing and mitigating transport impacts (Policy T4)

55. We support the ongoing emphasis on the mitigation of transport impacts arising from new development. We believe that delivering ‘good growth’ on the scale envisaged requires a collaborative approach between developers, TfL, the GLA and local authorities. It is important that the strategic transport infrastructure framework to enable development to take place in Opportunity Areas is determined at an early stage, as this provides developers with a clearer understanding of what is required for each Opportunity Area and thus the context within which individual development proposals can be brought forward.

56. We duly recognise our role in contributing to transport and infrastructure improvement which address the impacts of a development and have contributed many tens of millions of pounds to support TfL projects though our development programme over the past 20 years. As such, we understand that in certain circumstances, it can be appropriate for a development to help facilitate a wider transport infrastructure scheme, whether through the provision and/or safeguarding of land, the delivery of relevant physical improvements or financial support through planning obligations where such support can be reasonably related to the impacts of the development. However, it is also important that developers are not seen as a funding or delivery source for strategic transport upgrades that are needed to deliver the wider growth agenda at a London-wide level. It is therefore essential that the Mayor, through TfL and other agencies, continues to plan for the funding and delivery of strategic transport schemes to unlock Opportunity Areas, including Canada Water. This should include developing a broad range of potential funding sources, for example mechanisms which allow business rates redistribution to London Boroughs to be prioritised towards Opportunity Areas, recognising that development in these Opportunity Areas will in turn generate substantial uplift in business rates.

57. We would welcome the opportunity to discuss how the planning system and financial regulations currently operating in London be changed to guarantee that more of money received by local councils and the GLA from regeneration projects is ring fenced for the area in which they were generated for example Business rates, Council tax, new homes bonus. This seems reasonable to us and will help local communities get behind and fully benefit from the regeneration projects occurring in their areas.

User:	Better Bankside Business Improvement District

This section of the plan should outline how new transport offers, such as Uber, have impacted the current road space/the overall transport network, and how the proposed transport schemes will rebalance the road network in favour of sustainable transport.

Additional information is needed on how the proposed transport schemes will improve air quality across London and, in particular, central London. Further, the plan must outline how the proposed transport initiatives interact with other elements of the plan to improve air quality and note which initiatives can be brought forward to improve air quality.

The London Plan does not address the role new technology will have on the transport network, including both benefits and challenges.

User:	London Borough of Haringey
The Council supports the policy.	

User:	Lib Dem Candidates for Hampstead Town

Policy T4 - Efforts must be made to ensure that there is adequate assessment of the impact of transport policies, and what will be done in mitigation, eg to reduce pollution and improve air quality in order to protect children in the numerous schools in Hampstead.

User: London Borough of Lewisham

We support T4, especially assessing/mitigating transport impacts and the healthy streets approach which is key for physical activity and tackling health inequalities. It is consistent with the approach we already take.

Questions have been raised that T4 is overly detailed in so far as it requires Transport Assessments for all applications and this is unnecessarily bureaucratic as TfL guidance does not require this

Further consideration that should also be given to:

- Including words such as requiring Transport Assessments ‘where appropriate or necessary’.
- Making T4 more applicable to all scales of development across London.
- Including words such as ‘~~road~~ danger *on roads and to users of all transport networks*.

User:	London Borough of Brent

The Council supports this policy.

Amend paragraph 10.4.2 to state:

"For developments of strategic importance… applicants are strongly advised to engage early with Transport for London and boroughs through the pre-application process…".

User:	London Borough of Tower Hamlets

We support this policy in principal but question if it is robust enough to direct a refusal on inadequate transport capacity grounds.

User:	Environment Agency

We welcome initiatives to increase sustainable modes of transport, and encourage cross referral to policies for design, greening and sustainable drainage in Chapters 3, 8 and 9. We welcome the need for transport assessments to support the ‘Healthy Streets’ approach at policy point B.

User:	Environment Agency
We welcome the need for transport assessments to support the ‘Healthy Streets’ approach at policy point B.	

User: Save Swiss Cottage

ASSESSING AND MITIGATING TRANSPORT IMPACTS: POLICY T4

Traffic associated with the school run is a significant problem in Camden, particularly in NW3 where there is the highest concentration of schools in Europe. Numbers of children living in Hampstead of school age at the time of the 2011 census was 1,396 but in 2007 there were 9.868 children attended local schools, and by 2017 this number had increased to 12,659 (a 28% increase). This does not just result in congestion, but also has a serious impact on air quality. In 2017 Camden Air Action carried out a detailed study that reported that at least at least 80% of Camden school children are breathing illegal air.

Camden's Local Plan has gone some way towards ensuring that the problem does not worsen, stating that it will "refuse applications for new schools or the expansion of existing schools in these areas, unless it can be demonstrated the number of traffic movements will not increase." However, the London Plan is entirely silent on this important issue. We suggest that the London Plan should adopt the wording used in the Camden Local Plan within Policy T4, with the following additional requirements:

(1) All applications for new or expanded schools should include an Air Quality Assessment demonstrating the impact on air quality (Draft London Plan policy SI1 requires this for "major development". Given the cumulative effect of traffic and air quality impacts arising from school development, this requirement should be extended to school-related applications).

(2) There is a concern that applications may be submitted which demonstrate that traffic movements will not increase, but that this will be based on travel plans and mitigation measures which are either not carried out or result in the actual levels of traffic movements being underestimated at the planning application stage. Policy T4 should therefore state that where planning permission is granted for new school development, on the basis that the number of traffic movements will not increase, a planning condition should be imposed limiting the number of movements to those specified in the application. If this is exceeded, the local authority will be able to take enforcement action. The condition should include a self-reporting requirement, requiring schools to report to the local authority specifying the number of children who travel to school by car.

User:	Royal Borough of Kingston
Support.	

User:	London Borough of Hillingdon
The provisions of this policy are broadly supported.	

User:	London Borough of Hackney

Hackney supports the approach that requires development to identify and mitigate any adverse impacts of development on the transport network.

User:	London Borough of Hounslow

LB Hounslow supports this policy. The Borough requires a Traffic Assessment and Travel Plan to be submitted with planning applications. In addition to this, the Borough is carrying out two comprehensive traffic assessments to provide an evidence base to the Local Plan Reviews of the West of Borough area and the Great West Corridor. LBH would like to see a reference to the importance of traffic reduction and increase accessibility in this policy as it is a key component of mitigating the impact of development on the transport network.

User: Westminster City Council

As with other draft policies in the DRLP this sets out an extremely detailed, prescriptive approach that does not allow for deciding what is proportionate in each case.

Criterion B seeks to give guidance produced by Transport for London formal policy status. TfL has no formal locus in the planning system of course (and cannot produce either planning policy or supplementary guidance). If it is intended that any requirement should have the kind of force suggested here it should be spelt out in the policy, be consulted on and examined like any other area of policy. As it stands, it is impossible to comment on the reasonableness or otherwise of what it is being suggested local planning authorities should do. Furthermore, no guidance is provided as to what scale of development such requirements apply to; as such it is too vague to be capable of implementation.

As worded, criterion E would apply to all forms of development, which does not represent a proportionate approach. Boroughs should have the room to decide the best way of using their resources in places, and for types of development, where intervention is likely to be most effective.

User: London Borough of Southwark

The council considers in assessing and mitigating transport impacts in paragraph E, there should be emphasis to include the need for an environmental assessment as well.

The council recommends the following amendments:

T4.B - The phrase “plus other borough policies/guidelines” needs to be added.

T4.E - The phrase “as well as associated effects on public health” should be deleted because it is intuitive in the remaining part of this sentence that effects on public health are being considered.

T4.F – The phrase “and where increased road danger is perceived, proper remedial measures must be put into place prior to their execution or occupation”, should be appended.

Paragraph 10.4.4 – The phrase “and active travel infrastructure” should be included (after the word ‘connectivity’) in the last bold sentence.

User:	London Borough of Wandsworth
Essentially a continuation of existing policy.	

User:	London Borough of Richmond Upon Thames
Essentially a continuation of existing policy.	

User:	London Borough of Harrow

The Council supports the policy.

The Mayor and its partners, specifically TfL need to be more forthcoming with data to developers, which assists in determining what impact developments would have on the existing network. Currently, developers, and Local Authorities rely on PTAL/number of bus/train stops/services, rather than actual detail on frequency and capacity of the services on those routes. Applications need to be able to detail if nearby public transport is fit for purpose, capacity, frequency and destination to suit future users needs.

User: Mr Joe Ward

The plan seeks to further restrict car parking in new development and to reframe the link to PTAL. Allowing excessive car parking in Policy T4 is inconsistent with the main transport policies which seek to reduce car trips.

Proposed changes:

· The following amendments should be made to Policy T4(C) – 'Where appropriate' should be deleted and Policy T4(D) should be changed to read "..planning permission may **will** be contingent on the provision of necessary public transport and active travel infrastructure."

· Table 10.3 - The bottom four rows should be amended so that the maximum parking provision in a development in any area (whatever the PTAL) is 0.3 spaces per unit.

· Paragraph 10.4.4 – the word 'Ideally' should be deleted and the sentence reworded as follows: "[Del - Ideally] New development **of all sizes, but in particular** that **which**will give rise to significant numbers of new trips**,** should be located in places well-connected with public transport…"

· Policy T6 H: should be amended to read "Boroughs wishing to adopt borough-wide or other area-based car-free policies will be supported. *[Delete the outer London caveat sentences.]* Minimum standards are not appropriate for **residential or** non-residential land uses in any part of London."

Rationale: Development in Low PTAL areas (the vast majority of London) should be accompanied by improvements which increase the PTAL *rather than* low PTAL being a reason for allowing high car-space provision. The maximum car space per unit levels in low PTAL areas in Table 10.3 (as high as 1.5 spaces per unit - albeit this is a maximum and lower levels would be expected with small units) are too high to be consistent with the main Policy T1 (delivering 80% of trips to be made by foot, cycle or public transport by 2041). The maximum should be reduced to 0.3 for all areas whatever their *current* PTAL, with measures required to increase the PTAL if a development is to go ahead.

User:	London Borough of Enfield

Policy T4 looks at ‘Assessing and Mitigating Transport Impacts’. The current approach to development related travel plans is flawed so the focus should be on developers providing suitable mitigations to address transport issues and monitoring via TRICS compliant surveys. TPs should not be part of the process and instead should be mitigation offered to the new users of a development because they will have a vested interest in delivering improvements. The use of Grampian type conditions to phase development in line with transport infrastructure investment should be explored by the GLA but this requires full commitment from the Mayor. The Plan states that Transport Assessments should be submitted with development proposals but given it is not feasible for this to be applied to all scales of development, there needs to be clarification in the Draft Plan as to the thresholds for this requirement.

User:	(FOE) Friends of the Earth England Wales and Northern Ireland

We support Criterion A “Development Plans and development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity”. We suggest it would be helpful to add **“with priority given to extending choice and options for active travel for all groups”.**

User: (FOE) Friends of the Earth England Wales and Northern Ireland

Criterion C states that “Where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address any adverse transport impacts that are identified.” We consider that in circumstances where adverse transport impacts are identified in connection with development proposals then mitigation would be expected and therefore ‘**where appropriate**” should be deleted. If it is the Major’s intention to keep the text ‘where appropriate” then the supporting text should explain what this means in practice. Otherwise there is a risk that schemes proceed without addressing adverse transport impacts because a decision maker views this as not ‘appropriate’. With no clear rationale, the policy may be subject to differing interpretations and the potential to achieve positive outcomes in practice will be diminished.

User:	(FOE) Friends of the Earth England Wales and Northern Ireland

Criterion D refers to circumstances “Where the ability to absorb increased travel demand through active travel modes has been exhausted,” We suggest the policy needs to make clear the importance of identifying ways to increase active travel modes before concluding the ability to absorb through active travel has been exhausted.

User:	(FOE) Friends of the Earth England Wales and Northern Ireland

Criterion E states “The cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, should be taken into account and mitigated.” It is essential to take into account cumulative impact, however, the policy should make clear that in circumstances where impacts are not able to be mitigated then development should not proceed. Further, the aim should be to avoid and minimise impacts in the first instance and then mitigate. We suggest the policy be amended to reflect these points.

User: Berkeley Group

11.4. For the reasons outlined above, policy T4 should not refer to financial contributions as these are secured through CIL. TfL should work with the boroughs to ensure that borough infrastructure lists include appropriate transport projects.

11.5. Whilst it is desirable to provide infrastructure in advance or in tandem with development, this may not always be possible. Delivery of development will provide the impetus for infrastructure development (including Government commitment to funding where appropriate) as well as funding through the Community Infrastructure Levy, S106 and retained business rates. Making development contingent on infrastructure provision could be counter-productive and may ultimately undermine the ability to deliver the infrastructure.

Policy T4 Assessing and mitigating transport impacts

Where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions(strikethrough) the Community Infrastructure Levy, will be required to address any adverse transport impacts that are identified.

D Where the ability to absorb increased travel demand through active travel modes has been exhausted, existing public transport capacity is insufficient to allow for the travel generated by proposed developments, and no firm plans and funding exist for an increase in capacity to cater for the increased demand, planning permission may exceptionally be contingent on the provision of necessary public transport and active travel infrastructure, having regard to the role of development in supporting infrastructure provision through Community Infrastructure Levy Funding and by providing a customer base.

E The cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, should be taken into account and mitigated through the Community Infrastructure Levy.

User: Motorcycle Action Group

T4 Assessing and mitigating transport impacts

MAG notes a preponderance of concern for mitigating impacts on Walking, Cycling and Public Transport. Again PTW's need to be included as a preferred mode of transport, and mitigation of impacts on this mode of transport must be given equal priority.

PTW's should equally be listed as a mitigation to use of other less efficient forms of motorised personal transport, including electric cars. This is due to the congestion reducing benefits and reduced creation of PM's offered by the transport mode.
As per our submissions on the ULEZ, PTW's have a positive impact on public health in comparison with dual track vehicles, and are proportional in terms of road danger to pedal cycles, and should therefore be highlighted in impact analysis of any development.

User: Highways England

Policy T4 Assessing and mitigating transport impacts

Highways England strongly supports the content of **Policy T4.** It is important that emphasis is placed on the evaluation of transport impacts and the provision and improvement of sustainable transport infrastructure, particularly where high trip generating developments are proposed.

In line with paragraph 9 of DfT Circular 02/2013, this emphasis will assist in mitigating potential increases in private vehicle trips. In addition, effective travel planning and travel awareness schemes offer a mechanism to minimise the impact to the highway network through the active management of residential and commercial trips.

Highways England welcomes the opportunity for early engagement through the pre-application process.

User:	Mr Dave Reynolds
So Give Bexley well connected Public Transport as outlined above.	

User:	Just Space
T4 Assessments and Mitigating Transport Impacts: T4D: That developments may be contingent on the provision of necessary public transport and Active Travel infrastructure as a policy requirement is not strongly expressed enough. Developments, in order to achieve sustainable development should fully address their transport, and for that matter environmental, health etc. impacts, and support public transport networks that are able to accommodate any additional movements.	

User:	London Borough of Bexley

The approach in **Policy T4 Assessing and mitigating transport impacts** is comprehensive and fully supported.

User:	Federation of Small Businesses
We wholeheartedly support this measure.	

User:	Ealing Matters

We strongly support the principles behind this policy which are reflected in earlier versions of the Plan. However, this is another area where the rhetoric of the policy is not matched by a sufficient clarity or firmness in implementation. It is clear now that myopic planning in and around Ealing's 5 Crossrail stations has very seriously led to lost opportunities to mitigate problems or take opportunities to embed the Healthy Streets Approach, especially because inputs from the local communities who are most familiar with areas around the stations and how they work have not been sought.

User:	London Healthier Places
The LHP Network supports this policy.	

User:	Redington Frognal Neighbourhood Forum

Policy T4 Assessing and mitigating transport impacts

Policy T4 C The words, “Where appropriate” should be deleted from the beginning of the paragraph and the final sentence of Policy T4 D changed to read,

“……planning permission will be contingent on…….”.

User:	Redington Frognal Neighbourhood Forum

Paragraph 10.4.4 (page 413). The first word “Ideally” is to be deleted and replaced by “New development of all sizes, but in particular, that which will give rise to significant numbers of new trips, should be located in places well connected with public transport……”.

User: CPRE London

Car parking provision

The plan seeks to further restrict car parking in new development and to reframe the link to PTAL. Allowing excessive car parking in Policy T4 is inconsistent with the main transport policies which seek to reduce car trips.

Proposed changes:

- The following amendments should be made to Policy T4(C) – 'Where appropriate' should be deleted and Policy T4(D) should be changed to read "..planning permission may **will** be contingent on the provision of necessary public transport and active travel infrastructure."
- Table 10.3 - The bottom four rows should be amended so that the maximum parking provision in a development in any area (whatever the PTAL) is 0.3 spaces per unit.
- Paragraph 10.4.4 – the word 'Ideally' should be deleted and the sentence reworded as follows: "Ideally New development **of all sizes, but in particular** that **which** will give rise to significant numbers of new trips**,** should be located in places well-connected with public transport…"
- Policy T6 H: should be amended to read "Boroughs wishing to adopt borough-wide or other area-based car-free policies will be supported. *[Delete the outer London caveat sentences.]* Minimum standards are not appropriate for **residential or** non-residential land uses in any part of London."

Rationale: Development in Low PTAL areas (the vast majority of London) should be accompanied by improvements which increase the PTAL *rather than* low PTAL being a reason for allowing high car-space provision. The maximum car space per unit levels in low PTAL areas in Table 10.3 (as high as 1.5 spaces per unit - albeit this is a maximum and lower levels would be expected with small units) are too high to be consistent with the main Policy T1 (delivering 80% of trips to be made by foot, cycle or public transport by 2041). The maximum should be reduced to 0.3 for all areas whatever their *current* PTAL, with measures required to increase the PTAL if a development is to go ahead.

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User: Claire Mellish

The plan seeks to further restrict car parking in new development and to reframe the link to PTAL. Allowing excessive car parking in Policy T4 is inconsistent with the main transport policies which seek to reduce car trips. Proposed changes:
The following amendments should be made to Policy T4(C) – ‘Where appropriate’ should be deleted and Policy T4(D) should be changed to read “..planning permission may will be contingent on the provision of necessary public transport and active travel infrastructure.”

User:	Claire Mellish
Paragraph 10.4.4 – the word ‘Ideally’ should be deleted and the sentence reworded as follows: “Ideally New development of all sizes, but in particular that which will give rise to significant numbers of new trips, should be located in places well-connected with public transport…”	

User:	Crest Nicholson PLC

We consider this Policy to be unsound as currently drafted and amendments are required.

We concur with, but do not set out in detail here, the representations made by the HBF in relation to Policy T4.

User: Catalyst Housing Limited

TRANSPORT

Criterion D of draft Policy T4 is not consistent with paragraph 32 of the NPPF, particularly the last bullet point which states that "improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe". The Plan should be amended to be consistent with this

User:	Living Streets

We support policy T4.

We strongly support embedding the Healthy Streets Approach in transport assessments.

User:	Orbit

Orbit considers that for developments in Bexley, a borough which has historically seen a continuous lack of investment in public transport infrastructure, it seems counter-intuitive to significantly increase housing delivery targets, but then potentially withhold planning permission subject to the provision of transport infrastructure. Rather than jeopardise development, a firm commitment is required from the Mayor and TfL to fund a sustained programme of public transport improvements to support growth in the borough.

User: Mr Paul McQuillen

The plan seeks to further restrict car parking in new development and to reframe the link to PTAL. Allowing excessive car parking in Policy T4 is inconsistent with the main transport policies which seek to reduce car trips. **Proposed changes:**

- The following amendments should be made to Policy T4(C) – 'Where appropriate' should be deleted and Policy T4(D) should be changed to read "..planning permission ~~may~~ **will** be contingent on the provision of necessary public transport and active travel infrastructure."
- Table 10.3 - The bottom four rows should be amended so that the maximum parking provision in a development in any area (whatever the PTAL) is 0.3 spaces per unit.
- Paragraph 10.4.4 – the word 'Ideally' should be deleted and the sentence reworded as follows: "~~Ideally~~ New development **of all sizes, but in particular** that **which** will give rise to significant numbers of new trips**,** should be located in places well-connected with public transport…"
- Policy T6 H: should be amended to read "Boroughs wishing to adopt borough-wide or other area-based car-free policies will be supported. *[Delete the outer London caveat sentences.]* Minimum standards are not appropriate for **residential or** non-residential land uses in any part of London."

User:	London Travel Watch

This policy supports transport assessments, as part of development control, and the provision of appropriate transport infrastructure, facilities and mitigation. This is supported.

User:	London Borough of Sutton

OBSERVATION. The ability of developers to “net off” floorspace means that the levels of developer contributions or CIL within the London Borough of Sutton are unlikely to be sufficient to make large scale transport improvements, and so the council would be reliant on TfL and/or DfT/Network Rail to bring forward schemes. This means that regional and national support for Tramlink extensions to Sutton and the London Cancer Hub, Crossrail 2 to Worcester Park station and Metroisation (from West Croydon to Belmont, and the Mitcham Junction line via Hackbridge to Cheam) are essential.

User:	Chartered Institute of Logistics & Transport

Policy T4 F requires that development proposals should not increase road danger. One element of such danger is the adverse consequence of a combination of slow speed and electric traction (both of which are laudable in their own right) which may result in lower awareness of danger by vulnerable road users, in particular pedestrians. Measures need to be taken to reduce the risks, for example by ensuring that such vehicles emit a distinctive noise to warn of their approach. In theory, autonomous vehicles will reduce such danger, but in turn could result in increased congestion.

User:	Persimmon Homes

Part f is unsound because it is imprecise and does not accord with National Policy;

Part F states that ‘Development proposals should not increase road danger’. Every trip generates the risk of an accident. It is considered that this policy is too imprecise and open to interpretation. It does not accord with the test at para 32 of the NPPF;

‘Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe’.

User:	Durkan

Policy T2 (Healthy Streets) outlines that development proposals should demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance. Policy T4 (Assessing and mitigating transport impacts) requires transport assessments to embed the Healthy Streets Approach within, and in the vicinity of, new development.

However, Policy T4 should recognise that developers are limited in what they can deliver off-site and such measures will require close cooperation with local authorities.

User:	London Borough of Newham

Policy T4 Assessing and mitigating transport impacts

LBN are generally supportive of the policy which is complementary to Newham's Draft Revised Local Plan, and welcomes the requirement for Transport Assessments to measure compatibility with Healthy Streets.

LBN also particularly support points T4.D-E concerning consideration for active travel promotion, impacts on transport capacity by development and the factors around the cumulative impacts and road safety as their impacts on the transport system.

User: Barnet Society

Paras 10.4.1-4

Making it easier for people to use buses is not only about the network and service frequencies. It is also about their ability to serve new housing developments. Boroughs must consult London Buses at initial planning stage. Medium and large new housing developments will need distributor and access roads, which must be wide enough for conventional buses to use (6.5m). Developers often argue for 5.5m widths on the grounds that fewer homes would result, but when asked they are unable to quantify the number.

Road layout is important. Boroughs should presume a through bus route requirement as this increases the range of destinations available. A crescent-shaped access off a main road is very suitable and does not encourage rat-running. Culs-de-sac bus access is not encouraged in residential areas as it involves double running, which is not attractive for through passengers. Maximum walk distance between any dwelling and bus stop should be 400m – this an actual and not an airline measure, and should mean that most dwellings are well within this standard.

A reference should be added to the Chartered Institution of Highways & Transportation publication *Buses in Urban Developments*, principal author Tim Pharoah (2018):

www.ciht.org.uk/en/document-summary/index.cfm/docid/1D79344D-A8E9-429B-A0C6710299356BCD

User:	Hoare Lea LLP`

Modal share information is not included in the required assessment (as a specific requirement). It may be considered worthwhile to introduce carbon assessment/air quality assessment based on anticipated modal share and design/condition around a reduction benchmark.

By introducing anticipated modal share information and the associated impact on air quality and (operational) transport related emissions it may be possible to recognise potential for, or a requirement for alternative arrangements.

User:	London Borough of Ealing

Assessing and Mitigating Transport Impacts (T4)

The Council support this policy and it aligns with our own adopted Sustainable Transport for New Development SPD.

Amend 10.4.4 to fully funded proposals by applicants to impact transport, access, capacity or connectivity should be required unless they can demonstrate extenuating circumstances.

Adequate transport contributions/mitigations should be required irrespective of any other contributions/mitigations (e.g. social housing, open space etc.).

Adequate transport contributions/mitigations should be required irrespective of funding sources whether private or public sector.

User: Sustrans

Sustrans supports policy T4:
A – Development Plans and development proposals should be integrated with current and planned transport access, capacity and connectivity, particularly for walking and cycling networks and the public realm.
B – We welcome the additional detail regarding transport assessments, particularly the consideration of impact on walking and the cycle network. We strongly support embedding the Healthy Streets Approach in transport assessments.
C – We support the appropriate mitigation of impacts identified in the transport assessment for walking and cycling through either direct provision of highway improvements or financial contributions
D – It is critical that existing or planned active travel and public transport capacity is available to absorb any growth in demand as a result of development. Planning permissions, therefore, should be contingent on the provision of necessary public transport of active travel infrastructure.
E – We strongly support the requirement for development to consider and mitigate the transport effects on public health and the supporting explanatory paragraph (10.4.3). However, we are concerned this does not have an enforcement mechanism.

B - The National Cycle Network should be included for consideration by Development Plans and development proposals in transport assessments.
“E The cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, should be *identified through the transport assessment process* and *mitigated in line with Policy T4 C and the Healthy Streets Approach.*”

User: Hornsey & Wood Green Labour Party

The plan seeks to further restrict car parking in new development and to reframe the link to PTAL. Allowing excessive car parking in Policy T4 is inconsistent with the main transport policies which seek to reduce car trips. Proposed changes:

1. The following amendments should be made to Policy T4(C) – 'Where appropriate' should be deleted and Policy T4(D) should be changed to read "..planning permission may will be contingent on the provision of necessary public transport and active travel infrastructure."
2. Table 10.3 - The bottom four rows should be amended so that the maximum parking provision in a development in any area (whatever the PTAL) is 0.3 spaces per unit.
3. Paragraph 10.4.4 – the word 'Ideally' should be deleted and the sentence reworded as follows: "Ideally New development of all sizes, but in particular that which will give rise to significant numbers of new trips,should be located in places well-connected with public transport…"

User:	Hornsey & Wood Green Labour Party
We support this policy.	

User:	Kent County Council

Transport assessments for developments in outer London should consider the potential impacts on the transport network in the Wider South East, and it is important that London works collaboratively with neighbouring authorities, especially those in North Kent to ensure any potential impacts are mitigated accordingly. Employment generating developments should also consider the potential impact on the wider transport network caused by an increased number of commuters.

User: Cross River Partnership

Policy T4 should be expanded to consider the assessment and mitigation of impacts wider than those felt exclusively by the transport network. Transport schemes of a sufficiently large scale could mean significant disruption in some areas that entail the loss of key assets for the city.

This could be overcome if a collaborative approach to delivering Development Plans was adopted with BIDs and other local partnerships working with local planning authorities, GLA, TfL and DfT on shaping major transport infrastructure to the benefit of the capital. Unfortunately, we have seen proposals for infrastructure in London that have been insensitive to the important local assets that contribute to the city's international reputation.

In Camden, the HS1-HS2 surface link threatened the world famous markets. In Wimbledon, the setting for one of the world's most renowned sporting tournaments, Crossrail 2 poses similar risks as discussed under Policy SD1. On both occasions, BIDs have sought to find viable solutions to bringing projects forward in a way that complements the needs of the local area.

Using the local intelligence of these business-led partnerships at the earliest stage of Development Plans may allow the Mayor to protect key assets in the future, whilst enhancing transport projects, minimising the disruption and reducing long-term costs to the city by getting proposals right first time.

It is also critical that built up areas facing the challenges of construction or noise pollution, are supported.

User:	Oneill Homer
T4 Neighbourhood plans offer the chance to identify localised cumulative effects of proposals at key points on the local transport network and to identify local measures for their improvement through land use and development decisions.	

User: L&Q

Healthy Streets contributions

We understand the reasons why the Mayor is seeking to ensure that 80% of all trips in London is made by foot, cycling or public transport by 2041. As the Mayor is aware, developments can only support a certain amount of public benefits (such as affordable housing, open space improvements, etc) before a scheme becomes unviable. Moreover, any benefit must be directly related to the scheme and not used to rectify existing deficiencies (in the quality of surrounding public highway for example). It should be made clear in the supporting text to Policy T2 that:

? any financial obligations secured in respect of Healthy Streets improvements must be necessary to make the development acceptable in planning terms; directly related to the development; and fair and reasonably related to the scale and kind of the development, in accordance with the NPPF tests; and

? contributions can be “pooled” from several developments.

Policies T1, T2, T3, T4 and para 10.4.3 must be justified against the NPPF tests for planning obligations.

User: L&Q

Healthy Streets contributions

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? contributions can be “pooled” from several developments.

Policies T1, T2, T3, T4 and para 10.4.3 must be justified against the NPPF tests for planning obligations.

User: Camden Conservatives

ASSESSING AND MITIGATING TRANSPORT IMPACTS: POLICY T4

35. Traffic associated with the school run is a significant problem in Camden, particularly in NW3 where there is the highest concentration of schools in Europe. Numbers of children living in Hampstead of school age at the time of the 2011 census was 1,396 but in 2007 there were 9.868 children attended local schools, and by 2017 this number had increased to 12,659 (a 28% increase). This does not just result in congestion, but also has a serious impact on air quality. In 2017 Camden Air Action carried out a detailed study1 that reported that at least at least 80% of Camden school children are breathing illegal air.

36. Camden's Local Plan has gone some way towards ensuring that the problem does not worsen, stating that it will "*refuse applications for new schools or the expansion of existing schools in these areas, unless it can be demonstrated the number of traffic movements will not increase*." However, the London Plan is entirely silent on this important issue. We suggest that the London Plan should adopt the wording used in the Camden Local Plan within Policy T4, with the following additional requirements:

(1) All applications for new or expanded schools should include an Air Quality Assessment demonstrating the impact on air quality (Draft London Plan policy SI1 requires this for "*major development*". Given the cumulative effect of traffic and air quality impacts arising from school development, this requirement should be extended to school-related applications).

(2) There is a concern that applications may be submitted which demonstrate that traffic movements will not increase, but that this will be based on travel plans and mitigation measures which are either not carried out or result in the actual levels of traffic movements being underestimated at the planning application stage. Policy T4 should therefore state that where planning permission is granted for new school development, on the basis that the number of traffic movements will not increase, a planning condition should be imposed limiting the number of movements to those specified in the application. If this is exceeded, the local authority will be able to take enforcement action. The condition should include a self-reporting requirement, requiring schools to report to the local authority specifying the number of children who travel to school by car.

User: Mrs Alona Sheridan

The plan seeks to further restrict car parking in new development and to reframe the link to PTAL. Allowing excessive car parking in Policy T4 is inconsistent with the main transport policies which seek to reduce car trips. **Proposed changes:**

- The following amendments should be made to Policy T4(C) – 'Where appropriate' should be deleted and Policy T4(D) should be changed to read "..planning permission may **will** be contingent on the provision of necessary public transport and active travel infrastructure."
- Table 10.3 - The bottom four rows should be amended so that the maximum parking provision in a development in any area (whatever the PTAL) is 0.3 spaces per unit.
- Paragraph 10.4.4 – the word 'Ideally' should be deleted and the sentence reworded as follows: "Ideally New development **of all sizes, but in particular** that **which** will give rise to significant numbers of new trips**,**should be located in places well-connected with public transport…"
- Policy T6 H: should be amended to read "Boroughs wishing to adopt borough-wide or other area-based car-free policies will be supported. *[Delete the outer London caveat sentences.]* Minimum standards are not appropriate for residential or non-residential land uses in any part of London."

User: Blanche Cameron

The plan seeks to further restrict car parking in new development and to reframe the link to PTAL. Allowing excessive car parking in Policy T4 is inconsistent with the main transport policies which seek to reduce car trips. Proposed changes:

- The following amendments should be made to Policy T4(C) – ‘Where appropriate’ should be deleted and Policy T4(D) should be changed to read “..planning permission may will be contingent on the provision of necessary public transport and active travel infrastructure.”
- Table 10.3 – The bottom four rows should be amended so that the maximum parking provision in a development in any area (whatever the PTAL) is 0.3 spaces per unit.
- Paragraph 10.4.4 – the word ‘Ideally’ should be deleted and the sentence reworded as follows: “Ideally New development of all sizes, but in particular that which will give rise to significant numbers of new trips,should be located in places well-connected with public transport…”
- Policy T6 H: should be amended to read “Boroughs wishing to adopt borough-wide or other area-based car-free policies will be supported. [Delete the outer London caveat sentences.] Minimum standards are not appropriate for residential or non-residential land uses in any part of London.”

Policy T5 Cycling

User:	Hoare Lea LLP`

Cyclist storage appears greater than BREEAM requirements. High levels of cyclist provision are supported, however greater support for cyclist safety/segregation or shared areas should be provided as opposed to provision of extensive onsite cycle storage that may not be effectively used (due to the lack of surrounding cyclist infrastructure).

User: London Borough of Ealing

Cycling
(T5)

The Council supports the increase in cycle provision requirements for one-bedroom units across the borough and the increases for some commercial uses within the Ealing Metropolitan Town Centre and Southall Major Town Centre so that they are aligned with current standards for Inner London.
We believe that a case can be made for the inclusion of the entire Borough. But as a minimum we believe that all of Acton (including North Acton) should also be included in the zone where higher minimum cycle parking standards apply.

We propose that the policy should be amended to support and permit secure cycle storage facilities (subject to a given maximum size) in the front gardens of dwelling-houses in order to ensure higher take up of cycling in existing developments.

User: Unite Students

The proposed minimum cycle parking requirement for student accommodation is provided within Table 10.2 (Minimum Cycle Parking Standards) of Policy T5 (Cycling) and sets the standard at 1 cycle space per bedroom unit. The proposed requirement represents an increase from the adopted London Plan standards and is considered to be excessive as it based upon the unrealistic assumption that each occupant will require and utilise a cycle parking space.
Unite Students are supportive of the provision of cycle spaces to encourage sustainable travel, however, the proposed rates for 1 space per bedroom unit is considered unnecessary and unsound for several reasons set out in the following paragraphs.

Student housing is developed at higher densities than conventional housing and as a consequence and in order to provide these levels of cycle parking, large areas of floorspace typically at ground floor level, are required which could otherwise be used more efficiently and effectively for living or town centre uses thus reducing the viability of the scheme. Unite’s experience has shown that cycle parking provision within consented student schemes where this has been provided at policy compliant levels is severely underused. Enclosed within Appendix E (Representations to Draft New London Plan - WSP) is supporting evidence which refers to a recent survey (February 2018) undertaken by Unite to understand the present uptake of cycle utilisation across their student accommodation sites. The study demonstrates that the maximum average demand for cycle parking storage is 5% of bed places, which has been found across the 26 of Unite' sites which equates to a demand of one cycle space per 20 students.

By way of an example, Unite were required to provide a minimum of 423 cycle spaces for a student scheme in the London Borough of Islington which translates to a floor area of approximately 465 sqm or 385 sqm based on the typical requirements of 1.1sq.m for a Sheffield stand or 0.91sq.m for a dual-stacking system respectively. Based on an average student cluster bedroom size of approximately 11sq.m, this would result in the unnecessary loss of approximately 35-42 bedroom units.

Additionally, it has been demonstrated that an increase in the provision of cycle parking for student accommodation would not directly result in an increase in cycling patterns amongst students. Firstly, student housing schemes are generally in close proximity of places of study [allowing majority of journeys to be undertaken on foot and are in areas with high levels of public transport accessibility providing an alternative means of transport. Secondly, the influence and take up of Cycle hire schemes provide an affordable means of transport, precluding the requirement for private cycle ownership and storage which eliminates the need for students to invest in safety, security and maintenance associated with private ownership.

By way of justification for the increase in cycle parking requirements, the GLA refer to the evidence base document ‘Cycle Parking – Part of the London Plan, December 2017’ which notes that the 2013 Early Minor Alterations to the London Plan included minimum standards for cycling for the first time, as it considered that student accommodation is essentially residential in nature and as such should be consistent with residential standards. Subsequently, the evidence base recognises that further alterations did not include similar rises in cycle parking for student accommodation.
The cycle parking requirements for residential development should not be applied to student accommodation and it is considered that the proposed levels of cycle parking for student housing should be considered on a case by case basis as supported by the evidence referred to above.

Recommendation: We propose to broaden the wording of the policy to ensure a more flexible approach to the requirement is undertaken. Cycle parking requirements for student accommodation shall ***“be considered on a case by case basis.. The level of provision should take into account the location of the development and accessibility to public transportation, but as a maximum the provision should be 25% of the total number of bedrooms.***

User: London Chamber of Commerce and Industry

Policy T5 Cycling

106. LCCI supports improving transport infrastructure for road users and cyclists alike. Encouraging a modal shift from the car will contribute to the Mayor's aim of 80 per cent of all journeys being undertaken by public transport, walking or cycling.

107. However, to date, LCCI believes that cycle superhighways have had a mixed impact on London roads. London is constrained by a finite amount of road space, and fully segregated cycle superhighways – particularly during construction - can place unreasonable pressure on an already congested road network through reducing capacity and increasing travel times in central London.

108. LCCI would therefore like to see an evaluation of cycle superhighways and an exploration of whether new cycle lanes could be 'semi-segregated' during peak hours, rather than remaining part of the permanent infrastructure. There must be a full analysis of the current use of cycle superhighways, both in terms of usage and impact of travel times. There should be further consideration of how to better incentivise the use of cycle lanes to reduce instances where riders choose to use the road, rather than the segregated lanes provided.

User:	Grafton Group Plc

We are concerned regarding the proposed further increase in cycle parking requirements for one bed homes. We question that there is sufficient demand for this quantity of cycle parking. We are aware that a large number of residential cycle stores across London are significantly underused. The current cycle parking requirements are difficult to successfully accommodate into developments, often resulting in reduced active frontage at ground floor, which conflicts with the Mayor’s design policies. In addition, it reduces the amount of space within developments which can be used to provide homes, including affordable units, which directly conflicts with the Mayor’s agenda to maximise the number of units delivered across London. The proposed increase in cycle parking for one bed units from 1 space per unit to 1.5 spaces per unit will further exacerbate the current design and land use issues despite no evidence that there is demand for additional cycle parking spaces.

User:	Natural England

The planning use class system used as a basis for section F and Table 10.2 of this policy does not include greenspace and parks. In light of the high density development proposed in the plan, existing and new greenspace should be designed to support high levels of accessibility (whilst also minimising impacts to biodiversity). Therefore, we **recommend** that Table 10.2 is amended to include a section for parks to ensure that these areas are fully used as recreational destinations and can be easily accessed.

User: BEE Midtown

We welcome the Mayor’s Healthy Streets Approach and will continue to advocate cycling and walking as key ways getting around London. As part of this, we will work with our members to encourage investment in public realm infrastructure which facilitates this. Midtown are highly supportive of the Mayor’s commitment to cycling and are keen to work with his office and Transport for London to achieve his goal of 80 per cent active travel by 2041.

We have already undertaken various measures to help promote cycling in Central London. Our Midtown Cycle Vault in Bloomsbury Square offers 24-hour access to bike racks, showering facilities and lockers which are monitored by staff and CCTV around the clock. This project was match-funded by Transport for London. The continued expansion of cycle-hire schemes around London have proved to be highly popular with Londoners and tourists alike. We support this investment; however, we have some concerns surrounding the regulation of non-docking cycle-hire schemes. Whilst we understand that they provide more flexibility to commuters, we believe that aspects of their licenses should be reviewed. Namely, the Mayor should work with local councils to regulate the areas where they can be parked and the number of them which can be parked in one place. This can prevent pavements from becoming too cluttered in areas with high footfall.

User: Sustrans

Sustrans strongly supports Policy T5 Cycling.
A – We support the requirement for Development Plans and development proposals to help remove barriers to cycling and create a healthy environment in which people choose to cycle. We support the inclusions of the London Cycle Design Standards into cycle parking policy (2) and believe this should apply to the policy (T5 A) in full. The use of such standards across all cycling infrastructure is critical. Evidence presented at the previous alterations to the London Plan demonstrated how poorly designed cycle parking was underused, despite high demand for cycle parking facilities.5
We support B, C and particularly the pro-active approach to cycle parking standards identified in D, E and F.

A “Development Plans and development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle, *in accordance with the guidance contained in the London Cycling Design Standards*. This will be achieved through…”
Include an indicative map of the Strategic Cycling Network according to current plans and the Strategic Cycling Analysis.

User:	Sustrans
Sustrans strongly support the inclusion of minimum Cycle Parking Standards within the plan. Cycle Parking is critical infrastructure. Not only does it support existing cycle demand (over 700,000 journeys a day) and a rapidly growing mode of transport into the future (8.8 percent growth between 2015 and 2016 alone) it helps to unlock suppressed demand. People will not cycle if they cannot be confident of a parking space at their destination, nor will they own a cycle if storage at home is a challenge. Secure storage is also important for sustaining those who already cycle; TfL’s 2012 Attitudes to Cycling survey found that 29 percent stop cycling altogether after a cycle theft.6 Secure and convenient cycle parking at home and at destinations is vital to support growth in cycling, in line with current trends and the aims of the Mayor’s Transport Strategy.	

As a result, it is right to require minimum cycle parking standards of new development, both as infrastructure supplied within buildings to support sustainable travel and supplied through the public realm or financial contributions to cater for increased demand and activity associated with new development and London's growth. Given the Mayor's Transport Strategy aims, and this background rate of growth, we would expect a standard proportionate to the potential identified in TfL's analysis of cycling potential, ensuring that new development provides parking for every potential journey by bike, to absorb future growth beyond the timeframes of the Transport Strategy and more closely aligned with the expected lifecycle of the building.

? We strongly support the new approach to define an area for higher cycle parking standards in Figure 10.2, where existing demand is greatest and would fail to cater for future growth.7

? We welcome the commitment of the Mayor to support boroughs to adopt higher cycle parking standards (10.5.3); the mayor should require higher parking standards in: (i) the CAZ, particularly for City of London and Westminster, given their strategic role as major destinations for a large concentrations of journeys in Greater London; (ii) Opportunity Areas, particularly given Policy SD1 A 8 and their role in achieving higher active and sustainable mode shares than surrounding areas, and (iii) existing mini-Holland boroughs. We welcome the Mayor's support for higher parking standards with an emphasis on those developing Liveable Neighbourhoods.

User: Sustrans

A1

Non-food retail. We are concerned that the proposed standard is less than the evidence 2013 report of 1 per 200sqm

B1

Business Offices. We welcome the implementation of the 2013 FALP evidence report with a standard reflecting a 19 percent mode share for the area of higher cycle parking standards (figure 10.2). However, central London has shown the fastest growth, with flows over the central London cordon having grown by 244 percent between 2000 and 2016.

C1

Hotels. We are concerned that the proposed standard is less than the evidence 2013 report of 1 per 15 bedrooms.

C2

Hospitals. We are concerned that the proposed standard is less than the evidence 2013 report of 1 per 4 FTE.

Care homes / secure accommodation. We are concerned that the proposed standard is less than the evidence 2013 report of 1 per 3 FTE.

C3 - C4

Dwellings (all). We strongly support the change to include 1.5 spaces per 1 bedroom unit to reflect the increasing density of households in London, as set out in the evidence report and make owning a cycle an option for all residents of new developments.[10]
Sustrans also supports the inclusion of Student Accommodation in the definition of dwellings (C3) for the purposes of cycle parking standards.

D1

Nurseries. The 2013 Evidence Report recommended 1 space per 7 FTE staff and 1 space per 8 students

Primary Schools / Secondary schools / sixth form colleges. As above

Universities and Colleges. We consider that this standard should be 1 space per 4 FTE students; in many universities, there is an undersupply of short-stay parking and addressing this through the delivery of new short-stay parking should be reflected in the standards.

Health Care, including dentists. Welcome the increase in Short-stay parking to reflect the land-use

D2

Other (e.g. Cinema, bingo, etc.). The 2013 Evidence Report recommended 1 space per 7 FTE

Stations. The plan should define more clearly the criteria by which station cycle parking should be determined. For example, this could be according to:
? Station capacity and service frequency (existing or planned demand)
? Cyclable journey stages in the surrounding area, according to the Analysis of Cycling potential (potential demand)
? Quantum of expected future growth in line with the Mayor's Transport Strategy expected outcomes (future potential demand)

[10] Transport for London (2017) Cycle Parking: part of the London Plan Evidence Base

User:	Hornsey & Wood Green Labour Party

Provision for cycle parking is one of the most serious impediments to increasing cycling rates. The proposed minimum standards should be increased particularly for residential parking and there should be effective enforcement provision.

User:	Landsec
T5 Part B – we would like to suggest that cycle infrastructure, beyond what can be accommodated on site, should be identified and covered under CIL as planned infrastructure, rather than funded via a further commuted sum as currently proposed in the draft Plan.	

User: Redrow Homes London Division.

We encourage initiatives to promote sustainable travel. However, we query the effectiveness of the proposed policies and object to the increase in the long-stay cycle parking provision for C3 use for 1-bedroom units and the increase in short-stay to 1 space per 40 units. On large-scale developments in particular, this increase in cycle parking provision may:
? occupy ground floor space (resulting in less commercial / active frontage);
? result in more cycle parking space that will not be used by the occupiers of the development because of a lack of demand; and
? result in additional cost that could be better spent elsewhere (e.g. Healthy Streets improvements).

Instead of incrementally increasing the number of cycle spaces within schemes, we consider that the GLA and TfL should review their entire approach to cycle parking, particularly where evidence suggests fewer people are inclined to privately maintain their own bicycles (given onstreet shared cycles are increasingly being provided by both the public and private sector).

Cycle parking should be proportionate and flexibility and should be allowed for innovation and the inclusion of alternative practical measures to encourage sustainable travel, rather than simple insisting on giant cycle stores that have low usage as they do not seem to be what the majority of occupants want.

Policy T5 should, therefore, allow reduced cycle parking levels in developments if deliverable alternative ‘shared cycle’ approaches can be brought forward in conjunction with TfL.

User: Sean Creighton

It is not possible, for example, to have a continuous cycle lane along London Road from Norbury to West Croydon because the road is not wide enough, given the existing bus lanes, the heavy traffic congestion, and the need for more buses.

If the aspiration for a great increase in the number of people cycling is to be achieved, action is needed to deal with the potential risks. Large number of cyclists ride their bikes without consideration to vehicle drivers and pedestrians e.g. riding on pavements, not wearing luminous clothing, inadequate front and rear lights, riding through red lights, weaving among vehicles often not been seen by drivers because of blind spots in their mirrors' read views. The Mayor should campaign for the introduction of licences for cycles and other two wheel vehicles, and compulsory training in road use, repair and the Highway Code.

User: Cross River Partnership

Policies that support cycling becoming an easier and more desirable transport mode are widely supported. Provision of adequate capacity of cycle parking is not always easy to retro-fit to denser parts of the city. The policy should encourage large scale developments to provide capacity for neighbouring areas.

The focus on improving cycling facilities off-street within developments is welcomed; and that any on street cycle parking provision is where necessary and appropriately located.

The inclusion of delivery of cycle routes is welcomed, in liaison with local stakeholders (including Boroughs and BIDs) to ensure appropriate placement. This will ensure that any physical infrastructure, or increased use of cycle routes does not adversely impact other desirable modes including walking.

The Policy could also consider reference to other cycling facilities including inclusion of showers and lockers in new commercial developments for staff and visitors.

User: Aviva Investors Pensions Limited and Galliard Homes Limited

Aviva and Galliard support the principle of encouraging appropriate and adequate cycle provision as part of new large scale proposals for development.
However, it is noted that there is currently very little evidence presented within the draft London Plan for the proposed increase in the minimum cycle parking standards set out at Table 10.2. This evidence should necessarily be based on surveys of cycle parking usage at existing developments to support the proposed uplift in provision.

Aviva and Galliard do not consider that an increase in the demand for cycle ownership is to the extent which is currently suggested by the draft London Plan. Whilst a general increase in cycling trips within London is not disputed it is not clear as to what proportion of these are as a result of schemes like the Santander Cycle Hire (as opposed to people using their own private bike). Accordingly, we request that further consideration of this is undertaken as part of the evidence base in order to properly inform the policy.

With respect to flexible solutions, Aviva and Galliard welcome the acknowledgement that it is not always possible to provide the full amount of cycle parking onsite and that individuals boroughs should work with developers to provide alternative solutions.

In particular, there has been a recent emergence of Dockless Cycle Hire companies in London, which TfL acknowledges has ‘potential to make cycling more accessible and attractive for Londoners’. Accordingly, further consideration of this is required to help cater for the rise in cycle trips, particularly as it avoids the need to own, store or maintain a private bike, and given how integrated the hire process is via a mobile phone app. The evidence base is totally silent on the potential for Cycle Hire schemes to be successful and to relieve some of the pressure on development sites to provide vast areas of dedicated parking for private cycle ownership.

For high density large-scale apartment blocks, a different approach to cycle parking is needed, one that recognises that some people wish to own and use a bike, whilst others will want to simply hire one and not have the hassle of storing or maintaining one. At the moment, the cycle parking standards are weighted far too heavily in favour of private ownership.

User:	Oneill Homer
T5 Neighbourhood plans can identify local routes to connect with the strategic cycle routes and with green infrastructure assets, local retail centres, schools, Healthy Streets etc. and can ensure that site allocations on or adjoining a route can contribute to improving the route.	

User: L&Q

Cycle parking

The current standards are excessive as and experience demonstrates there is much surplus capacity across developments delivered across London. We object to the increase in the long-stay cycle parking provision for C3 use for 1- bedroom units and the increase in short-stay to 1 space per 40 units. On largescale developments in particular, this increase in cycle parking provision may:

? occupy ground floor space (resulting in less commercial / active frontage);

? result in more cycle parking space that will not be used by the occupiers of the development because of a lack of demand; and

? result in additional cost that could be better spent elsewhere (e.g. Healthy Streets improvements). Instead of incrementally increasing the number of cycle spaces within schemes, we consider that the GLA and TfL should review their entire approach to cycle parking, particularly where evidence suggests fewer people are inclined to privately maintain their own bicycles (given onstreet shared cycles are increasingly being provided by both the public and private sector).

Policy T5 should allow reduced cycle parking levels in developments if deliverable alternative ‘shared cycle’ approaches can be brought forward in conjunction with TfL.

User: Highams Park Planning Group

Encouraging people to walk or cycle rather than drive supports efforts to reduce congestion, improve air quality and improve public health. There are opportunities in the Area to enhance facilities for cyclists and improve safety. The Plan supports increased provision of cycle parking and improvements to and expansion of cycle routes and the adaption of the public realm to make the experience of cycling more pleasant.

POLICY TPR3: Cycling and Walking:

Development should make adequate provision of bicycle storage in residential and commercial development at ground floor or basement level in order to promote improved provision for cycling throughout the Area and to encourage cycling and walking.

Contributions shall be sought, in conformity with the Waltham Forest Planning Obligations SPD (Section 5) from development within the Area, which shall be used to:

i. Provide new bicycle lanes and paths and/or improve existing bicycle lanes and paths,
ii. Provide new bicycle stands in all parts of the Area – and particularly in HPDC.

During consultations for the Plan some people expressed a desire for:

? Improvements to the rail service such as a direct rail link to Stratford and stations at Chingford Hatch and closer to the junction of Forest Road & Hale End Road.
? Improvements to Highams Park Station and Subway in addition to those currently being undertaken by Transport for London.
? A review and upgrading of certain public rights of way and footpaths in the area.
? A direct bus service from Highams Park to Whipps Cross Hospital.

These aspirations are included in Annex 1 - Aspirations, Community Projects & Actions.

User: dp9

Cycle Parking Standards

10. Policy T5 provides updates to the cycle parking standards which are subject to increases beyond those currently required as part of the London Plan (2016).

11. Whilst BPS fully support the aspiration for increasing cycling, we do not believe that an arbitrary increase in standards is the optimum method of achieving greater cyclist mode share. We believe that cycle parking provision should be creative and flexible allowing for innovation and organic growth of cycling as
a mode.

12. Experience from our first development phase (Circus West Village) has shown that provision of ample cycle parking is not the only means for encouraging cycle use. We believe that that a range of other factors, including quality and location of cycle parking provision, provide an equally important role in
encouraging cycling and that the Mayor should prioritise quality over quantity when discussing cycle parking provision in the London Plan.

RECOMMENDATION: Provide the ability for developers to be flexible in the provision of cycle parking allowing designs to meet forecast demand.

User:	Standard Life Investments

We are concerned regarding the proposed further increase in cycle parking requirements for one bed homes. We question that there is sufficient demand for this quantity of cycle parking. We are aware that a large number of residential cycle stores across London are significantly underused. The current cycle parking requirements are difficult to successfully accommodate into developments, often resulting in reduced active frontage at ground floor, which conflicts with the Mayor’s design policies. In addition, it reduces the amount of space within developments which can be used to provide homes, including affordable units, which directly conflicts with the Mayor’s agenda to maximise the number of units delivered across London. The proposed increase in cycle parking for one bed units from 1 space per unit to 1.5 spaces per unit will further exacerbate the current design and land use issues despite no evidence that there is demand for additional cycle parking spaces.

User: Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living

T5 (414) - Cycling

This policy must include flexibility for various different types of proposals which reflect the requirements of the end user.

The unnecessary imposition of this policy where there is clearly no requirement for such provision would put at risk the delivery of viable older people's proposals in our view. Where specialist accommodation makes provision for mobility scooters, a lower level of discretionary cycle spaces should be considered.

Objection: This policy is not positively prepared or effective as it does not consider alternative housing typologies. We respectfully request that it should be amended.

User: London Borough of Camden

Table 10.2 requires a new higher level of cycle parking which is welcomed. Infrastructure that facilitates cycling is a key factor in encouraging active travel. However, the Plan also differentiates between different parts of London in the required level of parking, based on the fact that around 3.5 per cent of trips arriving at workplace, leisure and shopping destinations are made by cycle in inner London compared to around 1.5 per cent elsewhere in London. This suggests that the differentiated standard responds to existing demand, rather than future growth, both from increased population and cycle potential from modal shift. The draft Mayor's Transport Strategy (MTS) notes that cycling has huge untapped potential to replace many of the shorter car trips made in outer London. TfL's Strategic Cycle Analysis also notes that there are 8 million cycleable trips a day, 58% of which are made by car, many of which are in Outer London where both car ownership and use is much higher than inner London. Both the Analysis and the MTS also map key corridors and opportunities to improve the cycle network, where they predict a growth in cycling demand, including many areas in Outer London. We would therefore recommend a higher level of cycle parking in outer London to support and encourage this demand, consistent with the Mayor's Transport Strategy.

At the same, we request clarification on how the actual levels of cycle parking per square metre have been calculated as this would help boroughs to provide a robust justification to developers.

User:	London Borough of Camden

The Plan does not include the required quantity of adaptive cycle parking spaces. TfL generally requests 5% of the total number of cycle parking spaces be made for the use of non-standard cycles, although Camden asks for up to 10%. Including a figure in the Plan (ideally 10%) will help boroughs defend a request to developers to provide cycle parking space and facilities for disabled cyclists. We also request that TfL provide more detail on the type of infrastructure required.

User: Battersea Project Land Company Limited

Cycle Parking Standards

10. Policy T5 provides updates to the cycle parking standards which are subject to increases beyond those currently required as part of the London Plan (2016).

11. Whilst BPS fully support the aspiration for increasing cycling, we do not believe that an arbitrary increase in standards is the optimum method of achieving greater cyclist mode share. We believe that cycle parking provision should be creative and flexible allowing for innovation and organic growth of cycling as a mode.

12. Experience from our first development phase (Circus West Village) has shown that provision of ample cycle parking is not the only means for encouraging cycle use. We believe that that a range of other factors, including quality and location of cycle parking provision, provide an equally important role in encouraging cycling and that the Mayor should prioritise quality over quantity when discussing cycle parking provision in the London Plan.

RECOMMENDATION: Provide the ability for developers to be flexible in the provision of cycle parking allowing designs to meet forecast demand.

User:	Siemens

1.2.3 Cycle detection system – keeping cyclists safe

Creating a safe and heathy environment for cyclists (Policy T5) is key to increasing the use of bikes. Siemens' WiMag Cycle detection uses in-ground wireless detectors and microwave radar technology to identify and count bicycles of all types, including those constructed from carbon fibre. This system can be used to detect the presence of bicycles, provide count information and enable traffic signalling phasing to be tailored based on cycle demand. The system can be used in conjunction with the WiMag Vehicle Detection System, sharing the same communications infrastructure and using access points and repeaters.

User: Federation of Enfield Residents & Allied Associations

1. **Misplaced funding of arterial cycle tracks in the suburbs**: arterial cycle tracks in the suburbs are seriously over-blown and misconceived. The need to encourage travellers out of cars is not argued, but such transfers to cycle as may be promoted are evidently diverting from public transport, so low gains in terms of reduced car usage and resulting pollution. Apart from some small health benefits it is a perversion of public policy to spend £1bn over 10 years for cycle infrastructure that yields so little. TfL's cycle strategy deserves immediate and critical review.

The GLA must understand that there are two classes of potential cyclist – local trippers of up to 3km from home to shops or stations, and commuters. But trippers proceed the shortest route to their destination, mostly avoiding threatening cycle tracks; commuter cyclists for whom speed is all, will not use time consuming tracks with the added risk of collision with pedestrians at bus boarders every 400m. Had these facts been researched rather than asserted, this programme would have taken a different and much more positive course. FERAA strongly supports tailored local cycling routing using quiet ways, and opposes the deliberate blocking of arterial roads with obstacles that slow traffic and contribute nothing to pollution abatement.

User:	Transport for London

We have worked closely with the GLA to develop the new standards for cycle and car parking that are contained in the draft Plan. The approach to cycle parking caters for areas of London where greater provision is needed to cater for forecast and potential growth in cycling at certain land-uses. This will ensure that the infrastructure required to support expected future demand for cycling in new development is delivered at the outset, having regard to your ambitions to increase levels of cycling

User:	Karl Brown
10.5.4 Given their stated function as local centres for much activity, eg convenience shopping, it would be expected to see District and Local centres also included as areas having high potential for cycled trips.	

User:	Association of Directors of Public Health

In T5, we support increases in cycle parking but would emphasise the need to increase the amount of cycle parking dramatically especially in central London. We suggest an amendment to T5 A 2): **Significantly increase** (delete securing) **the provision of** (delete appropriate) **levels of cycle parking, especially in central London, which should be fit for purpose, secure and well-located.**

User:	Lynn Zaidman

PROMOTE THE USE OF ELECTRIC BICYCLES AS A NEW MEANS OF TRANSPORT. SO OFTEN ONLY ONE PERSON IS IN A CAR DRIVING INTO LONDON AND NEARBY BOROUGHS.

Policy T6 Car parking

User:	One Housing Group

Draft policy T6: ‘Car parking’

OHG support the generality of the parking policy and the associated parking standards but some requirements are unduly prescriptive and give little or no consideration to specific local circumstances. It should be revised so that standards levels can be varied within reasonable limits, where this can be justified or be dependent on monitoring through a Travel Plan.

User:	Durkan

Policy T6 (Car parking) states that car free development should be the starting point for development and that developments elsewhere should be ‘car-lite’. This approach is supported.

Policy T6 outlines the most effective use of land should reflect a site’s connectivity and accessibility to existing and future public transport, walking and cycling routes. However, this does not appear to take into account future planning infrastructure and therefore deviates from Policy D6. Furthermore, the policy should also support the introduction of Controlled Parking Zones across London to further aid car free development.

If the requirement to consider future planned infrastructure is to be retained in Policy D6 then it should also be included in Policy T6. The policy should also include support for Controlled Parking Zones.

User: London Borough of Newham

Policy T6 Car Parking

LBN are generally supportive of the policy, that seeks to strengthen car free/light development which is generally complementary to Newham's Draft Revised Local Plan.

However at 10.6.1 it should be noted that the dominance of vehicles (notably cars) on the streets is a significant barrier to not just walking and cycling but also impacts bus reliability/journey times.

It is also submitted that (at 10.6.4) the level of car parking should also be considered against car sharing opportunities in the area (e.g. car clubs etc. Overall moreover, the policy needs to identify the link with ongoing divergent standards in Outer London boroughs and beyond and network loading in inner London. The strengthening of car free in London may cumulatively impact Outer London car parking and potential increases. Will this support the 80% of all trips in London by sustainable modes

User: Clarion Housing Group

Parking levels must continue to relate to PTAL and accessibility of public transport and cycle ways. Car free schemes may be acceptable in Boroughs with sufficient public transport links but elsewhere there needs to be a better template for controlled car use

Car-free development as a starting point fails to acknowledge parking spaces are required to sell some schemes. Reducing car parking levels may affect both potential value and viability of new developments in poor PTAL areas, indirectly reducing the number on new homes built regardless of clause T6.1- F stating that the provision of car parking should not be a reason for reducing the level of affordable housing in a proposed development.

Car-free and minimum ‘car-lite’ developments require both disabled and servicing bays provided located close to the relevant block entrance or lift core otherwise problems in both letting and on- going management are highly likely, particularly with the management of parking related to family size accommodation which is often difficult.

The requirement to reflect this car-free/ car-lite approach in redeveloped estates may be challenging. Our experience of regeneration schemes is that retaining current levels of parking is often a critical issue for existing communities who would be unhappy to lose parking, and hence be far less likely to support a regeneration project.

Clause T6-I Add: reflect the current approach where possible. Delete: and not be re- provided at previous levels where this exceeds the standards set out in this policy.

User: Alzheimer's Society

1. It is good to see the provision of non-residential disabled persons parking bays being included in policy **T.6**. As you will be aware, people with dementia are now explicitly entitled to be part of the blue badge scheme, and so we hope that the figures used to calculate the appropriate percentage of blue badge parking have included people with dementia. Other local authorities have experimented with Dementia Friendly parking bays[1] with some success, and we would like to see those encouraged in other areas.

[1] https://www.localgov.co.uk/Plymouth-first-to-launch-dementia-friendly-parking-spaces/40235

User: Dagenham Dock Limited

Draft Policy T6 – Car parking

DDL supports the aspirations of Draft Policy T6 and Table 10.3 which seek to reduce the level of car parking delivered on future development proposals. DDL also supports Draft Policy T6H which only allows boroughs to adopt alternative local standards for schemes in PTAL areas 0-1 as this will assist in removing conflict between the GLA and boroughs throughout the planning process; thus, removing uncertainty throughout the design process.

User: Aitch Group

My client has found parking issues to be one of the most significant barriers to development in London, particularly in the outer boroughs, where many existing residents have cars and lack of proper coordinated parking controls in and around town centres have led to significant local parking pressure.

We welcome the Mayor’s approach in terms of introducing maximum standards. However, the policies should recognise that the boroughs need to take a strategic approach to introducing Controlled Parking Zones in areas to enable the provision of higher density development.

The policies should be amended to make it clear that the lack of a Controlled Parking Zone in an area should not be a barrier to development or a reason for refusal where an application accords with other aspects of the development plan.

User:	Bexley Natural Environment Forum

We generally support the comments in 10.6.1, but it needs to be added that the dominance of the car is also becoming a significant barrier to bus movements. The reduced parking provision must be increased to include reductions on on-street parking specifically on bus routes and in bus lanes. Unfortunately this also revolves around the need of change in public habits.

User:	Hoare Lea LLP`

Benchmark levels would be recommended to be provided dependant on PTAL/air quality levels for specific locations.

Limits on car parking should be provided for central London location with high public transport accessibility. Car-free developments should be encouraged.

Where a car free development is not feasible, an option for consideration could be licenses for car parking use, for example in high end development that demands car parking. Receipts from licenses might be directed towards air quality initiatives.

User:	London Borough of Ealing

Car Parking
(T6 G)

The Council supports the principles of a car restraint approach to development. Car parking management plans are a useful tool that has been widely used by the Council particularly for developments comprising multiple dwellings and/or uses. This ensures that limited car parking is allocated sensibly and fairly as well as ensuring that there is a mechanism to tackle informal parking in order to preserve the public realm and general amenity.

However, it may not be practical for all developments with car parking to submit such a plan and clarity is sought.

User:	Member of Parliament James Brokenshire

- The zero parking target for developments around mainline stations in areas such as Bexley is likely to add to overall parking issues and displace problems into neighbouring areas. I believe this is too rigid and should be changed.

User: Purley & Woodcote Residents Association

Reduction in parking standards

It is impractical to make many types of new development without parking facilities. Politicians and developers should be aware that cars/vans – and hence parking - are essential to enable many residents of social/affordable housing (such as shift workers, medical staff, police officers, firefighters and service engineers with company vans etc). The parking targets in the current London Plan are already stringent and should not be made even more restrictive.

User: Jane Highfield

2. Parking limitations / restrictions

Much of the southern side of Kenley consists of development built on narrow country-style lanes (such as my own road 'Kenley Lane' which leads directly to the airfield). These lanes are only wide enough for one-way traffic, they all rise steeply and mostly have no pavements or room for pavements to be created. The idea of trying to build in this area seems to be totally unviable if parking possibilities are to be greatly reduced, as this would mean that pedestrians would need to use these narrow lanes more - and there is no question that this could be extremely hazardous.

User:	Sustrans
We strongly support the strategic approach and policies toward car parking, in particular, we support A, B, H and I.	

User: Countryside Properties PLC

Car Parking and Cycle Parking

We fully support the principle of car free developments within inner city areas, opportunity areas and town centres with a PTAL of 4 to 6 that are well served by public transport infrastructure. We also agree with the sentiments of reducing car ownership in other parts of London but suggest that the ‘maximum’ car parking standards proposed within Draft Policy T6 need to include some flexibility to take account of site specific circumstances where evidence justifies an exceptional case for higher car parking provision.

Again, we support the higher cycle parking standards and the move towards more sustainable forms of travel. However, there maybe instances where the competing demands for ground floor space (i.e. commercial uses, energy centres, waste/refuse storage and residential/non-residential active frontages) means it is not possible to accommodate all cycle parking within a highly accessible ground floor or basement location. We therefore welcome the following statement within Draft Policy T5:

“Where it is not possible to provide adequate cycle parking within residential developments, boroughs must work with developers to propose alternative solutions which meet the objectives of the standards.”

User: South West London and St George's Mental Health NHS Trust

Part I of this draft policy says that:

“Where sites are redeveloped, existing parking provision should be reduced to reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy.”

It can be the case that parking related to healthcare facilities can be reconfigured to release land for development consistent with part D of draft Policy S1 (Developing London’s Infrastructure) which says that:

“Development proposals that seek to make best use of land, including the public-sector estate, should be encouraged and supported. This includes the co-location of different forms of social infrastructure and the rationalisation or sharing of facilities.”

Vehicle parking can be an essential facility for healthcare facilities, not only for patients, carers and visitors but also for clinicians and other staff who may have to work anti-social hours or who may need to be able to travel efficiently between multiple sites as part of their duties. This is especially the case in London where many of the larger Trusts operate from multiple sites, sometimes in different boroughs. For example staff may need to travel between Springfield University Hospital and Tolworth Hospital, and may also have to visit patients in the community while also returning to ‘base’ at one of the Trust’s sites from time to time. It is often simply not feasible or an effective use of time for healthcare professionals to travel by means of transport other than a private car.

Part I of the policy as proposed could operate as a disincentive to the optimisation of public land if trusts will lose what they consider to be an essential part of their operational estate.

We strongly encourage the Mayor to incorporate some flexibility so that applicants may demonstrate the need for parking on case-by-case basis.

User: South West London and St George's Mental Health NHS Trust

The Trust supports the provision of adequate car parking for people with disabilities regardless of whether general use car parking is provided or not. The draft policy expresses a requirement for parking for people with disabilities to be provided and says that the quantum should be calculated as a percentage of the total general use car parking provision. We do not see how such a policy could be reasonably operated in circumstances (as encouraged by other draft London Plan policy) whereby a proposed development is otherwise car free.

The new London Plan should clarify the approach to the provision of car parking for people with disabilities in the event that no general use car parking is to be provided.

User:	Hornsey & Wood Green Labour Party

Policy T6 H: should be amended to read “Boroughs wishing to adopt borough-wide or other area-based car-free policies will be supported. [Delete the outer London caveat sentences.] Minimum standards are not appropriate for residential or non-residential land uses in any part of London.”

User:	Hornsey & Wood Green Labour Party

We agree with the establishment of car free developments wherever possible. Traders often think that the provision of car parking is important to their business but find when parking is restricted they benefit. Steps need to be taken to reassure traders when parking restrictions are proposed.

User: Councillor for Coulsden East Ward, LB Croydon

A reduction in parking standards and the insistence that new developments near transport hubs should have zero parking provision.

Policy T6 should be removed as it is impractical to make many types of new development ‘car free’. We are already seeing an exponential increase in on street parking that is causing huge problems in many suburban areas. People will continue to own cars but they will be forced to park them elsewhere, causing resentment within existing communities.

The targets within the current London Plan are already stringent and should be left in place and not tinkered with.

User: Cllr Richard Chatterjee

A reduction in parking standards and the insistence that new developments near transport hubs should have zero parking provision

Policy T6 should be removed as it is impractical to make many types of new development ‘car free’. We are already seeing an exponential increase in on street parking that is causing huge problems in many suburban areas. People will continue to own cars but they will be forced to park them elsewhere, causing resentment and disharmony within existing and future communities.

The targets within the current London Plan are already stringent and should be left in place and not tinkered with.

User: Mr Ian Leonard

the reduction in parking standards and the insistence that new developments near transport hubs should have zero parking provision without exception – this takes no account of the fact that, 1) most people can hardly afford to use public transport, especially if they have a family (cars are much cheaper to use), 2) a significant number of people do not work in places, are employed at places, or need to travel to friends and/or to support relatives, that are on normal or easily accessible public transport routes. I personally have often had to travel to places, as do most of my neighbours, that would have cost far more to get to using public transport than using a car and taken significantly more time to do so than using a car!

User:	Landsec

T6 Paragraph I: whilst we understand the Plan’s objective to reduce London’s use of the car, we think that this policy may block sites that could otherwise be brought forward for regeneration and/or delivery of new homes. Car parking has an important role to play in London to provided access for differing needs and purposes. As currently drafted the policy may prevent regeneration on car park sites where existing parking needs to be retained (e.g. to maintain public amenity or for contractual or economic reasons), but can be incorporated within a new development. The policy could therefore be amended to make exceptions for regeneration on or over commercial/ town centre car park sites which can be redeveloped whilst maintaining parking amenity. There should also be recognition of design that considers the ability to repurpose parking spaces over time - so as not to hold up important regeneration projects on car park sites.

User: Cllr Richard Chatterjee

Policy T6 Car parking

B Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking (‘carlite’).

User: Mr John Davenport

Large parts of Kenley have a PTAL of 0. The highest PTAL of only 2 is in a limited area around the train station, as the local train and bus services are so poor

Croydon council, in forming the latest 20-year Croydon Plan, has been unable to identify viable ways to significantly increase the PTAL of this area. Central Kenley is in a valley and residential areas extend up the valley sides. The hills are too steep for most people to cycle or to walk whilst carrying shopping. Many of our roads lack pavements, or have narrow pavements, and these discourage parents from using the roads to walk with young children, or to allow their older children to walk alone on the roads. Consequently, car usage is almost mandatory in this area

The existing on-site parking standards provided in the London Plan are already set too low for houses of at least 2 bedrooms, and spaces for new developments are already too few and should not be reduced further

Lowering the on-site parking standards further will result in a much greater demand for on-street parking for Kenley housing that is located both near and distant from the train station. In many cases there simply is no capacity for further on-street parking as the road network is narrow, lacks pavements, or is already fully utilised. Further housing that demands on-street parking will cause unsafe parking on our already very dangerous streets

User: Simon Brew

A reduction in parking standards and the insistence that new developments near transport hubs should have zero parking provision.

Policy T6 should be removed as it is impractical to make many types of new development ‘car free’. We are already seeing an exponential increase in on street parking that is causing huge problems in many suburban areas. People will continue to own cars but they will be forced to park them elsewhere, causing resentment within existing communities.

Furthermore, this policy completely ignores the fact that many residents such as plumbers, electricians, and white van man in general use company vans even if they don’t have a car, and they’ll need somewhere to park their vans at night reasonably close to home.

User: Simon Brew

The only reference to motorbikes is in para 10.6.7 in section 6:

Motorcycle parking will be evaluated on a case-by-case basis. Where provided, each motorcycle parking space should count towards the maximum for car parking spaces at all land uses.

This is a ridiculously negative view of the need for parking facilities for motorbikes, because you can park about six motorbikes in the space occupied by one car. While on the move, motorbikes are acknowledged to be one of the most flexible and least polluting of all forms of powered transport, so they should not be treated as if they are equivalent to cars. By contrast, there is ridiculous overprovision of cycle spaces, 75% of which will never be used; cycles and motorbikes should be positively ENCOURAGED to use shared parking spaces as this would also help to solve the serious crime problem of theft of motorbikes which are then used in street muggings, particularly in North London.

Overall, the car parking targets within the current London Plan are already stringent and should be left in place and not tinkered with, except that provision for motorbikes should be modified as discussed above.

User: Redrow Homes London Division.

The various relevant draft London Plan policies currently require applicants to attempt to identify spaces for disabled car parking, even where the development is ‘car-free’.
There are however accessible sites across London which can substantively deliver new homes and commercial floorspace where there is either no prospect whatsoever of accommodating parking or where doing so would make a scheme suboptimal. This might be either or both in terms of reducing what can be delivered or by detrimentally affecting how a development relates to its context (e.g. by reducing active frontages or through locating parking spaces in the public realm).

The London Plan should explicitly recognise that in some instances good planning dictates that minimal or no parking can be provided for any users. This will avoid protracted discussions on this point and allow acceptable development to proceed more quickly.

User: Sainsburys Supermarkets Ltd

Policy T6 I

We strongly object to the policy statement set out within Part I of Policy T6. It is essential that appropriate car parking levels can be re-provided as part of the redevelopment of existing foodstore sites.

A reduction in parking beyond the existing demand has significant consequences for the future operation of a foodstore. In particular, the forced reduction of spaces within a car park that is well used prior to the redevelopment will result in a potential loss of market position (as customers will be less inclined to visit a store if parking is less readily available and visit alternative locations where sufficient car parking is provided). This will compound any temporary loss of trade from construction works with the potential to make permanent these negative impacts.

As such, any loss in car parking, and the subsequent potential loss of trade, would need to be factored into any financial appraisal. A loss in parking is likely to render redevelopment schemes unviable, thus neutralising the potential significant benefits that could be forthcoming from mixed-use redevelopment schemes. The implementation of this policy would therefore present no real alternative to maintaining the foodstore in it’s current form, in some cases with a overprovision of car parking.

In addition, the policy as drafted does not reflect the potential for existing car foodstore parking to provide a valuable contribution to the Mayor’s objective of providing appropriate electric vehicle infrastructure throughout the capital.

The Mayor needs to adopt a more flexible policy framework which allows foodstore operators to approach this issue flexibly on a case-by-case basis which fully reflect the commercial circumstance, current and future car parking demand. Without this flexibility, the policy is likely to constrain the potential for the provision of new and affordable homes as a result of the redevelopment process.

It should also be noted that the disabled parking requirements are broadly identified as a percentage of the total provision which is heavily dependent on PTAL. The PTAL calculation has limitations and subsequently whilst this application of this method may identify high accessibility to a site, the individual characteristics of different sites could potentially offer significant challenges which would need to be considered on an individual basis.

User:	Moda Living Limited

Overly restrictive car parking standards which require the provision of inappropriate levels of car parking that exceed the requirements of the Build to Rent market given the excellent sustainability credentials of this use. Greater flexibility in the interpretation and application of these standards should form a key element of emerging Build to Rent policy in the London Plan.

User:	Ruislip Residents Association

Ch. 10 Transport

The proposed decrease in parking standards. Many residents of the outer Boroughs work in areas not easily accessed by public transport and the use of a car is essential to maintain their employment potential.

User: Cross River Partnership

It would be beneficial if this Policy also included a specific reference to the need substantially to increase the provision in parking areas of suitable recharge points for electric vehicles. The reference to the electricity supply constraints in para 9.3.8 (page 333) under Policy SI3 could also be covered here, given the likely rising importance of this issue over the next decade.

Policy T6 on Parking, Page 421. F Adequate provision should also be made for efficient deliveries and servicing. More force is needed here e.g. requirement for provision of offstreet loading bays.

User: Aviva Investors Pensions Limited and Galliard Homes Limited

The general lowering of parking standards is supported. The main concern for development proposals relates to the provision for residential disabled parking, and the difficultly in delivering an initial 3% provision, but being required to show how 10% provision could be accommodated in the future. This is an onerous and unrealistic requirement, particularly for large residential schemes where the difference between 3% and 10% provision is significant in terms of land-take. The policy needs to afford greater flexibility to proposals for major development which will deliver a significant quantum of housing.

The parking management details requested are also onerous and considered excessive. It would be better if individual boroughs set out their own disabled parking requirements according to local data (number of blue badge holders etc.) rather than imposing a blanket-wide provision that is not always needed or practical to provide.
Summary

User:	Oneill Homer
T6 Neighbourhood plans can help reconcile competing demands car parking space in the local area that reflect very local circumstances.	

User:	Eastcote Residents' Association

Car Parking Provisions
Reduced standards for the number of car parking spaces, particularly in areas with poor public transport and where the plan makes no provision for public transport enhancement, is of concern. Hillingdon has particular issues with this.
Eastcote has already experienced the results of the reduction in the number of car parking spaces provided on new sites – it has not led to a reduction in the number of cars, but rather greater parking problems on the roads. We note the LBH makes the point that car ownership in Hillindon is higher than any other London borough, whilst having the lowest average PTAL. In addition, it is the London borough that has the highest number of residents travelling to work by car, reflecting the number of residents working outside London and the limited public transport.

User: L&Q

Disabled car parking

The various relevant draft London Plan policies currently require applicants to attempt to identify spaces for disabled car parking, even where the development is ‘car-free’. The degree of flexibility for accommodating disabled parking across developments is generally welcomed. There are however accessible sites across London which can substantively deliver new homes and commercial floorspace where there is either no prospect whatsoever of accommodating parking or where doing so would make a scheme suboptimal. This might be either or both in terms of reducing what can be delivered or by detrimentally affecting how a development relates to its context (e.g. by reducing active frontages or through locating parking spaces in the public realm).

The London Plan should explicitly recognise that in some instances good planning dictates that minimal or no parking can be provided for any users. This will avoid protracted discussions on this point and allow acceptable development to proceed more quickly.

User: Highams Park Planning Group

POLICY TPR2 Parking:

In order to encourage the safe movement of traffic on roads in the Area development will be supported which includes the appropriate provision of:
i. Parking spaces up to the WFCS maximum in new developments within HPDC unless a Controlled Parking Zone (CPZ) is introduced covering HPDC, in which case car free development will be considered.

ii. Should Controlled Parking Zones be introduced, new homes developed within them shall not be eligible for Residents' Parking permits.

iii. A minimum of one off-street parking space for each new home in developments outside of HPDC.

With regard to the policies TRP2i and TRP2ii, the following condition will apply:

i. Where a development is "car-free" or residents are to be ineligible for Residents' Parking permits, all marketing material and any purchase agreement or rental contract shall make prominent reference to this. Copies of such documents shall be submitted to the Planning Authority for their approval, prior to the commencement of marketing activities.

User: UK Power Networks

You have outlined key plans in the Transport Strategy and the London Plan in setting out the key challenges and areas of focus for transport and electric vehicle use in London. We provided a response to the Transport Strategy consultation dated 2 October 2017, please refer to this response for our position on supporting the transition in London's transport plans. Additionally, UK Power Networks has already been involved in several discussions with the GLA on the transition of transport modes in London and we welcome further collaboration towards the effective delivery of commitments in these plans.

We are playing a leading role in encouraging the shift to low carbon transport – since 1990 the power sector has made a 49% reduction in greenhouse gas emissions, which provides a stark contrast to that of the 2% reduction observed in the transport sector14. It is clear that the transport sector will see significant changes in the coming years, for example, as stated earlier, by 2030, we forecast between 1.2 and 1.9 million additional electric vehicles (EVs) will be connected to our electricity networks alone. As such, we are committed and enthusiastic about our role in facilitating the uptake of EVs and plan to do so by advancing innovation wherever possible and we believe that up to 40% of the additional power required can be supplied by using smart solutions.

We have significant experience enabling the uptake of EVs15, and can provide unique insights into the impact of changes occurring in the transport system. While the UK has begun transitioning to a low carbon economy, the last six years has involved the connection of over 4000 EV charge points, placing additional load on our networks. This comprises of both charge points installed at customer properties and directly to our network such as on-street charge points. We have been actively exploring the impacts of EV charging demand on our networks as well as the opportunities for intelligent management of demand from the existing network capacity.

To illustrate how we have been actively supporting customers who are promoting and leading the electrification of the transport sector, we are proud to have facilitated Europe's first fully electric bus garage at Waterloo16, with both Camberwell and Northumberland Park bus garages also gaining similar connections in recent months. We are also collaborating on the Black Cab Green project with TfL and London Electric Vehicle Company to facilitate their desires to decarbonise and to better understand and mitigate network impacts of taxis and private hire vehicles as they become zero emission capable.

User: UK Power Networks

Our response to your Transport Strategy provides additional detail to our views on the decarbonisation of transport, but some of the key considerations that will help facilitate the transition to increased EV use are highlighted below:

? Early engagement: We encourage early engagement from the GLA, TfL, local authorities, fleet operators and customers with significant EV charging requirements. They should give careful consideration to the power supply and network infrastructure requirements early in their plans and we are committed to support them through this process.

? Visibility and notification: Visibility and notification of EV charge point installations enables more efficient planning and management of our networks, this is most crucial to low voltage networks where monitoring is less extensive. Electricity network operators have established an EV charge point installation notification process17 with the Electricity Networks Association (ENA) that currently captures data on the location and rating of charge points. This is largely a voluntary process and would be further improved by policy changes encouraging compulsory notification to the DNO. We consider the following as the minimum data fields that should be included in any future standardised format of data collection:
o Static data – location of charge point, number of sockets, rated power (kW) per socket, mode of charge (AC/DC), smart functionality e.g. stop charge, vary charge rate; and
o Dynamic data – charge rate and charging status.

? Standards: Standards are particularly important to ensure that customers have safe and secure smart functionality designed into a charging system that is also open, interoperable and scalable. Standards should be designed to allow consistent interaction and information exchange between the smart charge point and electricity network management systems as well as protection from cyber-attacks.

Building on existing initiatives, we believe the following steps would further help the adoption of EV’s and we welcome the opportunity to work together in supporting you advancing the following activities:

? Infrastructure stakeholder collaboration: Facilitating forum with key infrastructure stakeholders to ensure standardisation and interoperability of charge points.
? Communications: Publicising existing initiatives and alleviating concerns for drivers and fleet operators looking to electrify is a key element in advancing growth.
? Guidance: Providing more support and guidance18 to industry stakeholders including local authorities in the installation of public and private charge points.
? Smart Charging: Promoting measures being outlined as part of the Electric and Autonomous Vehicle bill, in particular requirement for Smart Charging. Smart Charging infrastructure will be important in enabling customers to charge their vehicles, by maximising the utilisation of existing network capacity and minimising the requirements and costs of reinforcing the electricity network.

User: dp9

Car Parking Standards

13. Policy T6.1 to T6.5 provides details on car parking standards for different land uses which in the Central Activity Zone (CAZ) results in the provision of car-free schemes.

14. BPS would urge the Mayor to not use the term ‘car-free’ development when the same policy requires an element of accessible (blue badge) parking regardless of the intention for the wider provision rendering no scheme truly car-free.

RECOMMENDATION: Reconsider the use of the term ‘car-free development’ when policy specifically requires parking provision.

15. BPS would ask the Mayor to fully consider the implications for such restrictive parking provision in the CAZ. Whilst BPS accept that car parking should be capped to discourage car use it is our experience that residents, and to a lesser extent, commercial tenants, sometimes require the use of vehicles. The ownership of car does not necessarily translate into regular use during peak hours and there are entirely reasonable means for residents to own a car even if for irregular use.

16. In terms of retail parking provision, through the preparation of several planning applications evidence has constantly shown BPS that car parking provision supports the viability of retail floorspace. Whilst many parts of the CAZ have excellent public transport links there remains areas where PTAL is low, particularly in and around Battersea prior to the implementation of the Northern Line Extension (NLE). The ability to provide car parking to support retail tenants and the wider success of the development is essential to ensure this new town centre destination is a success. As such, we would urge to Mayor to consider parking standards on an individual site PTAL basis rather than a blanket approach to the CAZ which encompasses a varying range of public transport accessibility.

RECOMMENDATION: Remove the blanket approach to car parking standards across the CAZ.

17. We would also ask the Mayor to consider the implications for such restrictive parking provision at this moment in time, when within the next 10-20 years forecasts suggest that the majority of vehicles will be electric. BPS fully supports and encourages a growth in electric vehicles removing one of the most damaging aspects of car use on the environment. However, in consideration of the parking standards we would query whether the Mayor has considered the impact of restrictive parking provision in the CAZ in the medium to long term where the sustainability of cars is significantly improved?

RECOMMENDATION: Be ambitious in planning for the next generation of vehicles and ensure that the spatial implications of the future are not compromised in the short term.

18. BPS support the proposed reduction in accessible (blue badge) parking at 3% initial provision reflecting the fact that not all tenants of wheelchair accessible units either own a car or have a blue badge. However, we would ask the Mayor to also consider the implications on developers being required to demonstrate how a total of 10% provision could be provided in the future. It is considered likely that this could ultimately result in significant impacts to the public realm surrounding buildings risking the wider Healthy Streets agenda.

RECOMMENDATION: Require developers to justify a reasonable accessible parking provision beyond 3% based upon local data and trends as opposed to a blanket approach of 10% provision.

User: Taylor Wimpey UK

Policy T6 & Table 10.3 Car Parking.

We do not support the proposed car parking standards and require a more flexible approach to the provision of car parking to serve residential development in all parts of London.

Regard must be given to the accessibility of the development, type, mix and use, availability of alternative modes of transport and local car ownership levels.

Reducing original car parking numbers where sites are redeveloped could present a barrier to schemes coming forward for redevelopment and a flexible approach should be adopted by Local Planning Authorities to ensure the regeneration of redundant or underused sites and the delivery of much needed housing.

The requirement to lease rather than sell car parking spaces within communal car parking facilities is overly prescriptive and should not apply in all circumstances.

User:	Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living

T6 (420) - Car Parking

Flexibility is required for older people’s accommodation parking standards to reflect the car use of residents as well as the location of the site. In general, the DLP should apply flexibility for older people’s housing proposals recognising the difference between older people’s housing proposals and general needs housing. Older people may be more reliant on the car than the younger population and mobility can assist with independence and well-being.

User: N\A

A reduction in parking standards and the insistence that new developments near transport hubs should have zero parking provision. Policy T6 should be removed as it is impractical to make many types of new development ‘car free’. We are already seeing an exponential increase in on street parking that is causing huge problems in many suburban areas. People will continue to own cars but they will be forced to park them elsewhere, causing resentment within existing communities. The current standards, whilst quite stringent, have not eliminated cars from new developments being parked in areas outside that development’s curtilage. The ‘low hanging fruit’, persuading less car-dependent residents from owning cars, has already been taken. It is hard to see that making the requirement even more stringent is going to do anything other than exacerbate the problem. The targets within the current London Plan are already stringent and should be left in place and not amended for ideological reasons.

User: Tesco Stores Ltd

4. Making the best use of land

This section of these representations with respect to the Draft London Plan make the following points:

1. Tesco can support the Good Growth principle of making the best use of land by redeveloping its assets to deliver new stores that are co-located with housing and community uses in mixed-use developments with higher sustainability standards.

2. However, Tesco is first and foremost a food retail business and will be unable to make a business case for mixed-use redevelopment of its existing stores unless the Draft London Plan enables sufficient parking to be re-provided to ensure the commercial viability of the replacement store.

3. Tesco are committed to reducing the reliance on the private car and improving air quality. However, reducing car parking levels in replacement large food stores will not achieve this aim and could result in longer car journeys.

4.1. The redevelopment of assets in Tesco's portfolio of sites could directly support the Good Growth principle of making the best use of land by redeveloping its assets to deliver new stores that are co-located with housing and community uses in mixed-use developments with higher sustainability standards. However, Tesco is first and foremost a food retail business and will be unable to make a business case for mixed-use redevelopment of its existing stores unless the Draft London Plan enables sufficient parking to be re-provided to ensure the commercial viability of the new store. An inflexible approach to replacement parking will prevent the redevelopment of sites which could deliver significant amounts of housing (10,000 homes) in London.

4.2. Markides Associates consider below the transport policies in the Draft London Plan in light of the operational requirements of Tesco stores.

4.3. **New Draft London Plan Policy T6 I**

4.4. Tesco is supportive of the Mayor’s aim to improve air quality in London for the benefit of all. Tesco accept that a step change is required to reducing vehicular traffic and associated exhaust emissions if this improvement is to be realised. Tesco accept that one measure to achieve this is to seek a reduction in existing parking standards to seek to reduce reliance on the private car. In principle Tesco are supportive of this, but seek acknowledgement that where larger retail supermarkets are redeveloped for mixed uses (including housing delivery) that a level of replacement parking will be required to ensure the redeveloped store is viable. If an insufficient level of parking is provided, and the resultant impact on trade too considerable, then such assets will simply not be redeveloped, and these opportunities to provide additional homes that London requires will not be realised. It has been assessed that Tesco’s operational assets can provide 10,000 new homes.

4.5. The New Draft London Plan position with regard to car parking is set out in Policy T6

4.6. Item I under Policy T6 is a new introduction to parking policy that does not exist in the currently adopted London Plan. It requires that where sites are being redeveloped that existing parking provision should be reduced so that it does not exceed the standards set out within the wider Policy.

4.7. It should be noted that food retail uses have different characteristics to many non-food retail uses. Whilst many purchases of comparison goods can be physically carried by a single person walking, cycling or using public transport, the same cannot be said for many food retail purchases. Other large footprint comparison retail associated with white good purchases also does not require car use, as the items are usually ordered in store and delivered at a later date.

4.8. Whilst there has been an increase in ‘basket’ shopping at smaller food retail stores and online ordering /deliveries, 84% of UK shoppers still carry out a weekly or fortnightly main food shop (Shoppercentric Shopper Stock Take 2017) that is likely in the majority of cases to require a vehicle to transport what is purchased. Larger format supermarkets are therefore heavily reliant on having sufficient car parking for them to operate successfully.

4.9. The redevelopment of large format food retail sites has the potential to assist greatly in the delivery of housing in London. However, development of these sites is only likely to occur if they are able to continue to accommodate food retail uses on a commercially viable basis. The total removal or reduction of parking to a level commensurate with the proposed standards could result in a retained store or redeveloped store being unviable. This would effectively stifle future development of these sites, which would instead remain focused solely on the operator’s core business.

4.10. In addition to preventing the delivery of much needed housing on existing food retail sites, the removal / reduction in car parking has the potential to result in less sustainable travel patterns and increased private vehicle mileage. Removal / reduction in parking at one particular location will not remove the desire of food shoppers to access stores by car. Instead, it will reduce the number of stores that they can access by car in their particular locality and as a result they would need to drive greater distances to be able to shop and park. The resultant increase in vehicle-km travelled is not compatible with the need to improve air quality in London.

4.11. Parking associated with food retail stores is also often used as general town centre parking, with shoppers using these to not only undertake their food shopping but to also visit other town centre shops and facilities. The linking of trips for town centre uses assists in keeping overall car trip generation levels down. Furthermore, the availability of car parking at town centre / edge of centre foodstores also assists in the wider viable of the surrounding retail area. The reduction / removal of this parking has the potential to adversely affect the vitality and viability of town centres. The importance of this particularly for the outer London Boroughs should not be underestimated.

4.12. Furthermore, not all food retail uses in / on the edge of town centres are located in areas with adequate on-street parking controls for all of the store's operational hours. Removal / reduction in parking in these locations could potentially result in big increases in on-street parking, thereby having significant adverse impacts on existing residents and other occupants of the area.

4.13. To ensure that these types of food retail sites have the potential to help in meeting London's housing need, it is therefore suggested that a more flexible, need based assessment relating to reprovision of car parking at redevelopment sites is followed. The following recommended wording changes would allow this flexibility:

Policy T6

I. Where sites are redeveloped, existing provision should ***ordinarily*** *be reduced to reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy.*

The following paragraph should be added to the supporting text for Policy T6:

4.14. **“There is the potential for existing owners / occupiers of large format retail sites to assist in bringing forward the delivery of housing and the wider public benefits that offers. However, it is recognised that this will only happen if these benefits can be delivered without adversely impacting the value and viability of the retained retail use in any redevelopment; which use can be heavily dependent on the availability of car parking. The starting point is therefore that parking on large format retail sites that are redeveloped should reflect the current approach and not be re-provided at previous levels unless the redevelopment brings significant public benefits and is shown to require all or a proportion of the existing car parking to achieve those benefits.”**

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User: Polly Chivers

I am thankful the open green spaces we currently enjoy in West London but I am writing to respond to the draft London Plan consultation. I am pleased that the draft recognises the importance of green spaces but policies need to be stronger to give them adequate protection, in particular:

- A more strict approach is needed to reduce reliance on the private car, including reduced parking provision in new developments and promotion of more sustainable transport modes.

User: London Borough of Camden

Camden welcomes the overall ambition to reduce the provision for car parking while ensuring that those with essential need to drive, particularly disabled people, can have access to a car. We welcome the support for boroughs wishing to adopt borough-wide or other area-based car free policies. We also welcome the requirement not only to be car-free in high PTAL areas, but also within 800m of Town Centres.

However, there is some confusion and a lack of clarity regarding the different criteria used to establish maximum car parking levels both within and across different uses. PTAL, CAZ, and inner and outer London are all factors used to determine parking standards, but they are applied inconsistently and the reason for particular standards is not explained and unclear. The approach in the Plan should therefore be made clear and amended to ensure consistency. We also request clarification on the rationale for the maximum number of spaces attributed to each use and the variations between them.

For example, residential parking standards for PTAL 4 in inner London require car-free, while PTAL 4 in Outer London allows up to 0.5 spaces per unit. The maximum level for PTAL 3 also differs for inner and outer London (Table 10.3). It is not clear why inner and outer London are differentiated in this way if PTAL (4) is used as the criterion Meanwhile all hotels and leisure uses, in both inner and outer London (Policy 6.4) in PTAL 4 are car-free.

Similarly, Policy 6.3, retail parking (Table 10.5), allows for parking at all locations in inner London below PTAL 5. This means that parking could be provided in a retail development in inner London PTAL 4, even though residential parking in this category is car-free. The standard for this class use also differentiates between inner and outer London, where the parking standard for inner London (below PTAL 5) is on a par with Outer London, regardless of PTAL.

Policy T6.1, residential parking, criterion D states that, for areas outside the Central Activities Zone (CAZ), car clubs may be provided in lieu of parking. This suggests that parking could be provided outside the CAZ, even though many of these areas, particularly in inner London, may have a PTAL of 4-6, or be close to a Town Centre, and should therefore be car-free. This is inconsistent with the provision in Table 10.3.

We would recommend for consistency that, as a minimum, all developments in PTAL 4, regardless of use class, should be car-free. In addition, the standard for PTAL 3 should apply equally to both inner/outer London locations. In addition, criterion D in Policy T6.1 (residential parking and car clubs), should be removed as it is not necessary. Alternatively it should be amended to provide a generic statement to say, for example, that where parking is implemented in line with the standards in the Plan, they should also give consideration to car clubs.

On this basis, we agree that car clubs should be provided to help encourage people to give up personal vehicles, and that these should replace, not be in addition to, agreed parking. We suggest that the London Plan set a standard for car clubs to replace parking at a ratio of a minimum of 1 car club space for every 6 private parking spaces. This is based on the research which demonstrates that a car club removes from 6 to 20 cars from the road.

Maximum parking standards have not been provided for some use classes, including B2-B8 (General industrial, storage or distribution), C2 (Hospitals, Care homes, secure accommodation), D1 (Various), and train stations. Also there is a lack of clarity on requirements for motorcycle parking.

Camden supports the view that disabled parking should be provided for essential users as outlined in Policies T6.1 and T6.5. Provision of disabled bays on-site in car free developments could result in abuse of the available spaces if no disabled users occupy the premises. Camden would therefore recommend that in the first instance all essential parking should be provided on-street to ensure that the highway authority can manage and enforce them, and not lead to an increase in parking provision for other users, in line with the draft Mayor's Transport Strategy.

With regard to Policy T6.2 criterion D, for office car parking to secure a commitment to reduce car parking over time through the Travel Plan process, we suggest that this could be enhanced further by encouraging boroughs to consider the introduction of a Work Place Parking Levy for managing parking demand from commuting.

User: Battersea Project Land Company Limited

Car Parking Standards

13. Policy T6.1 to T6.5 provides details on car parking standards for different land uses which in the Central Activity Zone (CAZ) results in the provision of car-free schemes.

14. BPS would urge the Mayor to not use the term ‘car-free’ development when the same policy requires an element of accessible (blue badge) parking regardless of the intention for the wider provision rendering no scheme truly car-free.

RECOMMENDATION: Reconsider the use of the term ‘car-free development’ when policy specifically requires parking provision.

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16. In terms of retail parking provision, through the preparation of several planning applications evidence has constantly shown BPS that car parking provision supports the viability of retail floorspace. Whilst many parts of the CAZ have excellent public transport links there remains areas where PTAL is low, particularly in and around Battersea prior to the implementation of the Northern Line Extension (NLE). The ability to provide car parking to support retail tenants and the wider success of the development is essential to ensure this new town centre destination is a success. As such, we would urge to Mayor to consider parking standards on an individual site PTAL basis rather than a blanket approach to the CAZ which encompasses a varying range of public transport accessibility.

RECOMMENDATION: Remove the blanket approach to car parking standards across the CAZ.

17. We would also ask the Mayor to consider the implications for such restrictive parking provision at this moment in time, when within the next 10-20 years forecasts suggest that the majority of vehicles will be electric. BPS fully supports and encourages a growth in electric vehicles removing one of the most damaging aspects of car use on the environment. However, in consideration of the parking standards we would query whether the Mayor has considered the impact of restrictive parking provision in the CAZ in the medium to long term where the sustainability of cars is significantly improved?

RECOMMENDATION: Be ambitious in planning for the next generation of vehicles and ensure that the spatial implications of the future are not compromised in the short term.

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RECOMMENDATION: Require developers to justify a reasonable accessible parking provision beyond 3% based upon local data and trends as opposed to a blanket approach of 10% provision.

User: Barts Health NHS Trust

Policy T6 – Car Parking

Part I of this draft policy says that:

“Where sites are redeveloped, existing parking provision should be reduced to reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy.”

It can be the case that parking related to healthcare facilities can be reconfigured to release land for development consistent with part D of draft Policy S1 (Developing London’s Infrastructure) which says that:

“Development proposals that seek to make best use of land, including the public-sector estate, should be encouraged and supported. This includes the co-location of different forms of social infrastructure and the rationalisation or sharing of facilities.”

Vehicle parking can be an essential facility for healthcare facilities, not only for patients and their carers but also for clinicians, community nurses and other staff who may have to work anti-social hours or who may need to be able to travel efficiently between multiple sites as part of their duties. This is especially the case in London where many of the larger Trusts operate from multiple sites, sometimes in different boroughs. For example staff may need to travel between two or more of Barts (City of London), the Royal London (LB Tower Hamlets), Whipps Cross (LB Waltham Forest) and Newham University (LB Newham) hospitals.

Part I of the policy as proposed could operate as a disincentive to the optimisation of public land if trusts will lose what they consider to be an essential part of their operational estate.

We strongly encourage the Mayor to incorporate some flexibility so that applicants may demonstrate the need for parking on case-by-case basis.

User: Tavistock and Portman NHS Foundation Trust

Policy T6 – Car Parking
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Part I of the policy as proposed could operate as a disincentive to the optimisation of public land if Trusts will lose what they consider to be an essential part of their operational estate.

We strongly encourage the Mayor to incorporate some flexibility so that applicants may demonstrate the need for parking on case-by-case basis.

User:	Transport for London

Restricting car parking in new development is also vital to achieving the aims of your Transport Strategy, with car parking policy playing a fundamental role in shaping the type of growth that happens in London as well as the travel patterns of residents and users. We recognize that the approach is - necessarily - ambitious, but the policies and associated standards contained in the Plan are spatially specific, having regard to the availability of alternatives in different parts of London, and will be vital in helping to reduce the dominance of vehicles on our streets and support higher density development in sustainable locations.

User:	Karl Brown

1.06.1 The acknowledgement (here and elsewhere) of parked cars, not purely moving ones, as a detriment to public realm, health and more is welcomed.

User:	MR ROY PRIOR
No planning consents should be given where sufficient off-street parking is not included.	

User: Mrs R Jennings

The issue of permitted parking spaces is one which must be sonsidered. It is crucial that any new properties have on-site parking. Cars being parked on what are generall narrow and speet riads already stop the fraffic and are dangerous. There are buses which try to run along the Valley Road new the station and slready they have difficulty with the existing on-street parking. There is always congestion around school times, so it is important that new houses have off-street parking.

User:	Association of Directors of Public Health

We also wish to see a reference to increasing levels of park and ride options in outer London. We suggest an addition to T6 new J: **Consider increasing levels of park and ride options in outer London.**

User:	Eastcote and East Ruislip Branch of the Ruislip-Northwood Conservative Association

? I/we are concerned that the Mayor's proposed standards for car parking are inappropriate for Hillingdon, where residents rely heavily on the use of a car to go about their daily lives

User:	Anne Smith

What plans do you have for enabling more motorists to have electric cars? We live in a Victorian terrace house and can’t have cables trailing across the pavement for charging. I haven’t seen any charging posts anywhere near where we live. We had to change our old car recently and as we only do about 3000 miles a year an electric car would have been ideal but we had to get a hybrid instead.

User:	David Wright

How about taking back car parking places and even roads for new parks, wild life planting and open space?

Encourage people who have turned their front gardens into desolate car parking to turn them back!

Policy T7 Freight and servicing

User: Tarmac

The statement that: ‘All Mineral Planning Authorities in London should identify and safeguard aggregate resources in Development Plans, including aggregate recycling facilities’ is a prudent proposal that should be retained in the final plan. Policy SI10 (Aggregates) shows appropriate consideration for the safeguarding of railheads used for aggregates. However, clause D should be developed to apply the agent of change principle (as that in policy SI15) to ‘design out potential conflicts’ in adjacent developments, for example, the impact of noise at the adjacent development rather than limiting operations at railheads, wharves and other mineral product handling operations. Similarly, the safeguarding of wharves and railheads used for the distribution of aggregates (policy T7, Freight and Servicing, clause C) is supported. The encouragement of re-use and recycling of construction, demolition and excavation waste within London promotes circular economy principle, with the provision for at least seven years of supply of aggregates welcome to secure future growth.

It should be recognised within this strategy that there will continue to be a need for road transport of goods from the rail head or wharf to their final destination. In these situations, HGVs will still be required even if for short distance movements. The London Mayor should consider further research into vehicles capable of low emission local delivery of construction materials and supporting infrastructure. In addition, it is recommended that The London Mayor supports further research in alternative fuelling of rail diesel engines as the technology is some way from being economically viable. Tarmac supports a long term ‘rail-based’ urban logistics solution. Further comments in the Freight Transport Policy regarding the encouragement of out-of-peak deliveries and a modal shift from road to rail support Tarmac’s freight strategy and should lead to a decrease in congestion on roads. However, on site planning and working practices need to be flexible enough to accommodate the opportunity that out-of-peak deliveries bring.

User: WSP

We fully support the emphasis on freight and servicing in the Draft. We note the emphasis placed in the Draft MTS to seek to reduce traffic flows in the peak hours and consolidate and retime deliveries. It is noted that there are a complex range of issues to be resolved which go well beyond planning policy and relate to business operations, patterns of supply and demand and the responsibility of individuals. The Draft refers to TfL's useful suite of guidance on this matter. We do feel that as with much of the Draft there could be more appreciation of technology, innovation and smart consulting in solving some of these challenges.

User: London Assembly Planning Committee

The policy should refer to the Mayor’s target for all of London to be within a 30-minute drive of a construction consolidation site. F. Development proposals should facilitate sustainable freight and servicing, including through the provision of adequate space for servicing and deliveries off-street. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments. Development proposals for construction consolidation centres should be located in such a way as to cover all of London within a 30-minute drive. The policy should seek to reduce the number of personal deliveries being made within central London.

G. Developments should be designed and managed so that the overall number of personal deliveries received on the site is minimised, and so that deliveries can be received outside of peak hours and in the evening or night time. Appropriate facilities are required to minimise additional freight trips arising from missed deliveries and thus facilitate efficient online retailing.
11.16 After a period of stability, LGV traffic has increased by 11 per cent from 3.8 to 4.2 billion kilometres per year since 2012, while HGV traffic has remained stable at 1.0 billion kilometres per year.93 Vans make up around 80 per cent of commercial traffic in London, and are responsible for almost all the recent growth in freight traffic.
11.17 The growth in freight traffic is a reflection, generally, of the growth of London’s population and economy. But the fact that van traffic has outstripped lorry traffic suggests other changes are contributing to the trend, including the restrictions placed on lorries, and the increasing popularity of internet shopping.
11.18 Internet shopping has increased significantly in recent years. In October 2011, 9.4 per cent of all retail spending was online. In October 2016 this had increased to 15.2 per cent.94 This changes traffic patterns as more vans are deployed, visiting more locations as they deliver packages to consumers and businesses. Traffic is also created by people returning items they have bought online.
11.19 Personal deliveries also cause an increasing amount of freight traffic. TfL has banned staff from receiving personal deliveries at work and urged other companies to do the same.
11.20 Freight consolidation has been effective at reducing delivery traffic. The Mayor is now promoting the use of consolidation centres. In his new Transport Strategy, he has set an ambition for all of London to be within a 30-minute drive of a construction consolidation centre. The London Plan should reflect this policy.

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User:	London Waste and Recycling Board (LWARB)

We agree with policy T7 – Freight and servicing which states Opportunity Area Planning Frameworks, Area Action Plans, and other area based plans should include freight and servicing strategies. We would suggest point A2 could be added to include reference to consolidation and micro consolidation centres in terms of infrastructure and facilities to manage freight and servicing. We suggest point A3 could also include collaborative strategies and reverse logistics arrangements to reduce emissions from freight as a whole.

User:	London Waste and Recycling Board (LWARB)
We also support point E to support new consolidation and distribution facilities	

User:	London Waste and Recycling Board (LWARB)

We also support point E to support new consolidation and distribution facilities, and **H**, to support micro consolidation as this will help to support effective reuse of materials.

User:	London Waste and Recycling Board (LWARB)

1. We support the statement in paragraph 10.7.2 that regional consolidation and distribution centres are needed to serve the city coupled with micro-distribution centres. We note the mayor supports the identification of new sites for load consolidation. As stated in paragraphs 58, and 92 of this document, we would suggest work is undertaken by the Mayor to investigate and identify appropriate sites to support this.

User: Association of Internation Courier & Express Services

AICES Members support the Mayor’s objectives to reduce emissions in London and improve air quality. AICES strongly supports the proposal to improve the charging infrastructure both for electric and hydrogen fuel cell vehicles.

Our members take their environmental responsibilities seriously and programmes are in place to reduce carbon footprint and the environmental impact caused by express operations. Across the industry, express services make continual improvements to fuel efficiency and operate the minimum number of vehicles in London needed to deliver an effective service to customers through efficient network planning and consolidation at hub operations. A number of our Members already operate electric vehicles and hybrid vehicles and stop start engine technology, as well as innovative fuel alternatives such as LNG.

AICES believes that there should be regulatory incentives for those adhering to industry agreed standards for cleaner, quieter and safer deliveries in London. This approach would ensure that both vehicle specification and training are taken into consideration as well as other policy priorities for example around air quality. For example, compliant vehicles could be rewarded with: use of bus lanes; exemption or reduced rate for the Congestion Charge; exemptions from London Lorry Control Scheme routing requirements for out of hours delivery; grounds for reviewing loading and unloading restrictions and abatement orders depending on the nature of the delivery and vehicle.

Express services operations are crucial to London businesses and our delivery and collection times have to coincide with the business working day. Any specific restrictions on delivery vehicles in London during peak times would have an enormous impact on the express industry and London as a whole. Deliveries cannot easily be retimed outside of peak hours owing to local restrictions put in place and managed by the 33 different boroughs. Localised restrictions on delivery vehicles during peak hours would further constrain the window in which deliveries can be made. Specific restrictions on HGVs would also have a negative environmental impact since an HGV vehicle carries roughly 8 times the material of a van. The Express sector uses HGVs to transport goods arriving by air from growth markets early in the morning to a service centre in the city before distribution by courier vans to customers for example in the financial services, pharmaceutical, and engineering sectors before 9am.

Restrictions on delivery vehicles can also damage the business case for investing in alternative fuel vehicles. Vehicles which run on gas or electricity are significantly more expensive to purchase, and this investment is only worthwhile if the vehicles can be used on multiple shifts throughout the day. Removing the ability to use them in peak hours would therefore make it harder for operators “go green”.

Consolidation centres for certain types of deliveries can play a role in reducing traffic movements. However, with express services, the main integrators offer a door to door service, where customers can track their package throughout from collection to delivery and already have their own hub ‘consolidation’ centres. The nature of express services means a van needs to go into the City to collect packages so will also normally enter laden with deliveries. It would not be efficient to drop off deliveries at a hub and go into the centre of London empty. For express services, therefore, outer-City consolidation centres would not be an option that could be considered, although such centres could be considered by other sections of the logistics industry.

AICES members would welcome a review of night time delivery restrictions to examine extended hours for delivery and collection. The Mayor also needs to review with London boroughs the provision of loading bays to ease delivery and collections and greater consideration should also be given to the impact on freight when cycling routes are introduced.

User:	Better Bankside Business Improvement District

This section of the plan should outline how new transport offers, such as Uber, have impacted the current road space/the overall transport network, and how the proposed transport schemes will rebalance the road network in favour of sustainable transport.

Additional information is needed on how the proposed transport schemes will improve air quality across London and, in particular, central London. Further, the plan must outline how the proposed transport initiatives interact with other elements of the plan to improve air quality and note which initiatives can be brought forward to improve air quality.

The London Plan does not address the role new technology will have on the transport network, including both benefits and challenges.

User:	West End Partnership
Policy T7A refers to other area based plans. It would be helpful to have clarification that documents, strategies, action plans, etc. produced by the Partnership would constitute ‘relevant documents’, in accordance with the Policy.	

User:	London Borough of Haringey
The Council supports this policy.	

User:	London Cycling Campaign

Add:
J (copied from paragraph 10.7.6): ***Transport for London's guidance on Construction Logistics and Delivery and Servicing Plans should be adhered to when preparing planning applications. Plans should be developed in line with this guidance and adopt the latest standards around safety and environmental performance of vehicles***

User:	Soho Society

T7F Development proposals should include sufficient funds for boroughs to monitor the Construction Logistics Plans and Delivery and Servicing plans to ensure that they work effectively in practice. Where such plans are shown to be inadequate boroughs should be authorised to restrict the use of the sites until such plans are modified to be shown to be working effectively.

T7G Any delivery or servicing to be made in the evening or night time must be assessed to ensure that they will not cause noise nuisance to neighbouring noise sensitive properties.

User:	London Borough of Lewisham

We are cautious of T7 as deliveries in the evening or night time will have noise impacts on residents. We would require agreement from the Environment Team before agreeing to evening/night time deliveries.

User:	London Borough of Brent

Amend Policy and/or supporting text to mention:

? The Fleet Operator Recognition Scheme (FORS) as well as the Construction Logistics and Community Safety (CLOCS) tool (paragraph 10.7.6) as complementary schemes.

? Lorry and coach parking facilities, including the provision of welfare and break facilities to ensure that nuisance from noise and refrigeration units is not experienced.

User: CBI

CBI members welcome the Mayor of London's guidance to support the provision of hydrogen refuelling stations and rapid electric vehicle charging points at logistics and industrial locations (Policy T7).

Businesses have suggested the Mayor of London's policies concerning air quality will require further investment in charging infrastructure to support the uptake of low emission vehicles going forward.

The Mayor of London should look to continue supporting a range of ultra-low emission technologies and their role in meeting both London and UK wide emission targets. This includes electric, hydrogen and green gas, amongst other technologies. Looking to the future, the Mayor of London's Transport Strategy is another step in the right direction, with the commitment to increase investment in charging and refuelling infrastructure from 2025 to 2035. As the Mayor of London implements this pledge, CBI members remain keen to work with the GLA, TfL and local authorities to help ensure a successful outcome.

User:	London Borough of Tower Hamlets
Support as is in line with borough objectives.	

User: Environment Agency

We welcome the requirement for Opportunity Area Planning Frameworks and other area-based plans to include freight and servicing strategies. This supports the Mayor’s draft Transport Strategy objective to transfer freight from London’s roads. If effectively delivered, freight consolidation opportunities will contribute to reduction in emissions, and to meeting the Mayor’s zero carbon targets, thus building resilience to climate change.

Recommendation:

The policy aims would be strengthened through cross-referral to the objectives of Policies SI14-16.

User:	Royal Borough of Kingston
Support.	

User: London Borough of Hackney

Hackney welcomes the approach as set in Policy T7 to promote sustainable freight / servicing movements, improve the safety and efficiency of freight / servicing and promotion of regional consolidation and distribution centres (both macro and micro) and the use of Construction Logistic and Delivery Service Plan (including CLOCS) to tackle the growing problem experienced by increased delivery and construction vehicles on roads in London.

Provision of logistics space within London would allow large consignments to travel during off peak hours for distribution from the new hubs, using smaller / less polluting vehicles. Adding consolidation facilities to new developments is a move in the right direction but does not address the underlying problems. While issues of compatible mixed uses with consolidation centres (noise disturbance road safety for example) have not been addressed.

TfL could use its corporate property team to investigate how these spaces could be used to provide “white branded” logistical space that is so sorely needed to begin to address the challenges of the rise in white van deliveries. Click and collect can play an important role too.

E commerce is rapidly changing the way that freight operates and there are likely to be further technical innovations in freight in the lifetime of the strategy (eg AVs, drones)? Could road pricing per mile or a premium toll on peak time freight deliveries be used to incentivise more efficient delivery and servicing - along with the increased use of cleaner vehicles and cargo bikes?

Hackney supports the requirement for Area based Plans to define freight and servicing strategies

User: Westminster City Council

As population increases and retail patterns change, the subsequent growth in freight movements has a significant impact on the road network and the urban environment, which can undermine the Mayor's approach to "healthy streets". Despite this, policy provides little guidance on how individual proposals significant adverse impacts, including on other highways users such as pedestrians and cyclists, should be addressed. Little evidence is provided that freight consolidation is successful, or achievable in central London. Meanwhile, to require all the outcomes set out in criterion E for every proposed freight consolidation or distribution facility may be impractical, particularly for small-scale facilities in densely developed areas. There needs to be some recognition of the need for proportionality and for trade-offs between objectives where appropriate.

Criterion G fails to consider local concerns in terms of noise and disturbance deliveries outside of peak hours can cause. Universal support of these could have huge implications for the quality of life of residents in central London, due to the servicing needs of retail and entertainment uses. For the reasons explained with regard to policy T4, the reference to Transport for London guidance is improper and should be omitted. Guidance is not the same as policy, and to suggest that it should be "adhered to" (paragraph 10.7.6) suggests it has a status it is not entitled to. The size of letterboxes in developments (paragraph 10.7.5) is not a strategic matter.

User:	London Borough of Hounslow

LB Hounslow supports this policy in principle. Policy T7 is supported, with the understanding that freight and logistics facilities are a core industry in the Heathrow Opportunity Area, and therefore Policy T7 A.1 may not be appropriate within the wider Opportunity Area outside of town centres. The Borough would like to see reference to the increasing freight traffic within London due to home servicing, as referenced in Section 10.7.2.

User:	London Borough of Redbridge

The Council supports this policy, however (especially for commercial development) it is concerned at how part G may conflict with the London Lorry Control Scheme which explicitly seeks to restrict lorry access and use during the evening and night time (and at weekends).The Council also believes more explicit reference should be given to the role of Network Rail in enabling the use of rail freight.

User:	London Borough of Wandsworth

Generally support but there should be more consideration on the potential impact of autonomous freight.

Policy T7 G is supported but there needs to be additional text to address concerns about the impact of evening/night time deliveries on neighbouring areas/properties e.g. noise. This is a particular concern for mixed use development (residential/retail).

User: McDonald's Restaurants Ltd

McDonald’s shares the Mayor’s ambition to reduce emissions from freight and already has a strong track record in this regard.

- All of our used cooking oil is converted into biodiesel for use by our delivery lorries. For 10 years our entire fleet of lorries has run on biodiesel, 40% of which comes from our cooking oil, creating over 7,500 tonnes fewer CO2 emissions than ultra-low sulphur diesel.
- Our used cooking oil, cardboard and kitchen food waste is collected by the same vehicles which deliver food and packaging to our restaurants. Using delivery vehicles in this way reduces the number of trips we make by 5,000 per year.
- In an example of the circular economy working in action, this cooking oil is converted into biodiesel at a UK plant which runs on the energy generated by our kitchen food waste, like coffee grounds and egg shells.
- Our delivery partner, Martin Brower UK was Highly Commended in both the Low Carbon Vehicle Operator of the Year (sponsored by BAE Systems) and the Noise Abatement Society John Connell Soundscape Award (sponsored by Transport for London).

20. Smarter freight

We are also supportive of a more flexible, smart technology-based approach to road usage in London. We are keen to work with the Mayor on the rescheduling of the city’s freight traffic and deliveries away from peak times to ease congestion, reduce pollution and improve air quality across the capital.

We believe that the London Lorry Control Scheme (LLCS) should be reviewed because restricting the journeys of vehicles which weigh over 18 tonnes to certain hours of the day and week is exacerbating air quality problems. Unintended consequences from this policy have meant that many lorries take excessive detours, thus emitting more pollution in the journey process. For example, when McDonald’s delivers between Marl Road Wandsworth and Oxford Street, the fastest route is 5.5 miles and should take approximately 20 minutes. However, when applying LLCS regulations, the route is significantly increased to 18.3 miles and takes 51 minutes to complete.

As we upgrade our fleet of 18 tonne vehicles to comply with Euro 6 emission standards, we need to upgrade the weight to 26 tonnes (due to a heavier engine). These new clean vehicles fall out of exemption and are subject to LLCS rules, adding mileage, time and emissions.

A review of the LLCS would also be able to take into account modern, quieter HGV technology which has significantly reduced the noise lorries make. We would welcome the opportunity to work with the Mayor to explore alternatives to the current scheme so that London’s roads can be quieter and enjoy cleaner air.

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User: Road Haulage Association Ltd

The RHA is disappointed about the lack of meaningful consideration that has been given to freight. The tone regarding freight throughout is negative, focusing on the perceived problems for others in respect of freight, it totally fails to consider the legitimate and essential needs of freight operators and their customers. Efficiency will improve when traffic congestion is reduced.

The safety of all road users is paramount. Drivers of Heavy Goods Vehicles are the most highly trained drivers, after emergency service vehicles. HGV drivers undergo periodic medicals and have legislated rest periods which are overseen by Driver Vehicle Standards Agency and regulated by Traffic Commissioners.

The London Plan and Integrated Impact Assessment appears to have made an assumption that pollution levels will be exacerbated due to the increased demand for road freight. This assumption appears to be incorrectly based on operating pre Euro VI engined HGV's, which have been replaced progressively since 2014.

This road haulage sector supplies London with almost everything Londoners consume, without this supply chain, there would be no food, medicines or other consumables for the welfare and wellbeing of Londoners.

It is unrealistic to think that substantial quantities of construction materials, furniture, white goods, food and other bulky and heavy goods can be delivered to site efficiently by any other vehicle than a heavy goods vehicle.

Authorities need to realise it would take twenty or more transit sized vans to carry the load of a 44 tonne articulated vehicle. Van are not subject to drivers hours regulations, or other safety related legislation and will increase congestion. Anti-lorry measure and restrictions will add to congestion instead of creating traffic free flow. No mention is made about lorry parking facilities, driver rest, or toilet facilities, where drivers take their mandatory break, daily and weekly rest periods. Special Types Goods Order load movements also need to move large infrastructure loads throughout London, there is no mention of how these load movements will be accommodated. There is an identified national shortage of lorry parking facilities and this vital part of the infrastructure has not been mentioned, or even considered. There is no mention of alternative fuel supplies, or charging facilities for electric commercial vehicles. Infrastructure of this type could be funded by S.106 planning agreements.

The operating life of a Heavy Goods Vehicle is about twelve years. Any changes to vehicle specifications must be carefully thought out and planned to take into account the twelve year HGV life cycle. Low emission vehicles do not solve traffic congestion problems, free flowing traffic does. At 10.7.1 the plan seeks to promote “consolidation, modal shift and deliveries at different times of the day and night”. The RHA believes that just one of those 3 policies will have a meaningful impact on freight movements, that is delivery at different time. At 10.7.2 reference is made to lorries and vans operating “at congested times of the day”. For lorries part of the reason for this is that draconian, bureaucratic and out of date LLCS restrictions from the 1980’s are in place that limits the economic use of lorries on the road network before 07:00 every day and at weekends. The haulage industry has worked on re-timing deliveries with some success. But this is hampered by the inappropriate limitations imposed on freight movements. It is the policies within London that prevent this now.
10.7.2 also inappropriately mixes up the operations of vans and lorries. This shows a fundamental ignorance about how logistics and supply chains work. The attack on the sector for freight vehicles being “less half full” also demonstrates a lack of understanding – we do not suggest that trains have to be full all the time or in both directions. We do not expect every car to have 5 occupants all the time either, or buses to be full on every journey. Freight vehicles cannot be full at all times, waste collection vehicles start empty and fill up and fuel tankers start full and finish empty. It should be recognised that for a freight operator, the objective is to meet the customers needs in the best way possible (safely and cost effectively)

The promotion of consolidation and distribution centres at the edge of London may have some merit, but the scope for journey reduction will be limited by the extra costs incurred by adding links into supply chains and the likelihood that there will be no support for operating costs. Land limitations will remain a significant issue.

Consolidation and distribution centres also only work for some sectors, there are a number of sectors where it does not and will not ever work, these include supermarket deliveries, high value goods, most pharmaceuticals, hazardous materials and products where cross contamination can occur. High Street consolidation centres will be a limited and costly solution at best.

The RHA welcomes the recognition of the importance of kerbside deliveries at 10.7.3, particular emphasis must be placed on providing adequate time for stopping and unloading at small high street based business premises that do not have off street loading and unloading facilities.

Expectations regarding modal shift (10.7.4) need to be realistic. Water freight on the Thames has been under used for several decades and does provide an opportunity in some circumstances. Rail is often network and site constrained. Modal shift will be very expensive in most cases and we would not expect it to have any impact at all on the growth of van use in the city.

Modal shift objectives will still need to consider the final mile delivery when modal shift is possible. The economic growth desired by the Mayor will be stifled unless proper consideration and provision is given to the need for road freight movement. The economic growth desired by the Mayor will be stifled unless proper provision is made to meet the needs for road freight movement.

The RHA believes that London's road space use can be improved which will lead to greater efficiency. Suggestions include;

Allowing HGV's to use bus lanes, this will free other road space, relieve congestion and improve air quality. (Bus lanes in Muswell Hill and Nine Elms have been successfully used in this way for many years).
? Missed deliveries (10.7.5) could be avoided by office deliveries, these would ensure the product is delivered first time and avoid the return to base and second delivery journey. This concept is supported by research carried out in 2017 by Prof Alan Braithwaite.

- The London Lorry Control Scheme was introduced in 1986 and is not fit for purpose. It adds mileage and emissions or operators choose to use smaller vehicles adding to congestion. At the very least the time window should be changed to allow unrestricted movements before midnight and after 05:00 on Monday to Saturday and movements after 08:00 to 20:00 on Sundays.
- The re-timing project has been successful and this needs to continue with TfL, Boroughs, Noise Abatement Society and the Mayor all working together.
- Any changes to vehicle specifications must be carefully thought out and planned to take into account the twelve year HGV life cycle.
- Priority given to faster roadworks and returning networks to full use after disruption.
- Ensuring that there is sufficient provision for lorry parking on new commercial developments.

Without road freight, supermarket shelves would be empty and the London economy would cease to function. We see that road freight is taken for granted by policy makers, the time has arrived where road freight must be prioritised and provided for as part of London's critical infrastructure.

Road freight must be embraced and facilitated, not hindered, so that the population of London has the commodities it needs to sustain the growth the Mayor seeks.

User:	The Northbank BID

T7: Freight & Deliveries:
Efficient and sustainable freight needs to be planned in the short and long term to ensure businesses can thrive. Investment in coordination for different needs and business sectors to be aligned with investment to reduce congestion and encourage deliveries and servicing away from peak hours with consideration of noise and peak hour use.

Through business engagement, investment in consolidation hubs and collaborative working has been identified as options for further consideration and more detailed review. The Northbank BID works with neighbouring business groups, other London BID's and councils to bring together a collaborative approach and a strategy.

User:	London Borough of Richmond Upon Thames

The Council generally supports Policy T7.There are no new issues/challenges arising from

Policy T7. Part E of Local Plan Policy LP 44 and paragraph 11.1.10 are consistent.

User: Network Rail

In order to support growth in the use of rail for passenger and freight transport, the Plan should propose the retention and greater provision of rolling stock depots and, in particular, freight yard and terminal facilities.

Increased rail freight access to and through London is an economic and environmental opportunity that should be identified in the Plan. Nationally, rail freight
takes 7.6 million heavy goods vehicle (HGV) journeys off the road each year. It also plays a vital role in supporting the construction industry for building London's homes, businesses, with circa 40% of the Capital's construction materials arriving by train. However, rail freight cannot achieve its full potential without changes to land use planning policy to protect existing rail freight sites and their associated facilities, and promote the construction of new ones. In recent years there have been similar notable frustrations with the development of new rail freight terminals across London, largely due to planning difficulties involved in such schemes. Equally, pressure for realisation of new housing has, in many cases, seen new residential development permitted in very close proximity to existing and future rail freight sites leading to environmental restrictions on the latter that subsequently serve to undermine the continued operational and economic viability of such facilities.

In addition to terminal developments linked to serving the construction sector, the emergence of an express freight and urban logistics rail freight offer promises to be an exciting new market for rail, supporting the delivery of parcels and retail goodsdirectly into city centres. In London, this traffic could be based both around enhanced traditional rail freight sites as well as exploiting latent out of hours capacity of major stations. A sector that would directly support urban load consolidation and sustainable last-mile delivery as proposed in Policy T7 of the Plan.

The Plan should also propose measures to increase freight capacity on orbital routes across the capital, such routes being critical to Channel Tunnel traffic growth and traffics to/from those ports and manufacturing facilities located along the Essex Thameside corridor. Equally, the completion of infill schemes to enable more electrically-hauled rail freight to operate in London should be promoted. Such schemes are identified in Network Rail's Freight Network Study, published in 2017.

User:	London Borough of Havering

Havering considers that the policy should more explicitly recognise and promote the opportunities for the river Thames to be used for freight. Havering commented on this in its response to the draft Mayor’s Transport Strategy in autumn 2017).

Criteria C

Havering supports safeguarding of wharves.

User:	London Borough of Harrow
The Council supports this policy.	

User:	Royal Borough of Greenwich

Support regional consolidation and distribution centres. However, there are numerous examples of attempts to develop consolidation centres in London at the borough and sub-regional level and these have proven unviable. Consolidation can only be effective if led by and coordinated by the GLA and TfL though measures such as safeguarding or by securing though the planning process.

User:	London Borough of Enfield

Policy T7 ‘Freight and Servicing’ needs to indicate how developers and boroughs should resource the development and monitoring of Construction, Logistics and Delivery and Servicing Plans. A light touch online system should be favoured.

User: Motorcycle Action Group

T7 Freight and servicing

E Development proposals for new consolidation and distribution facilities should be supported provided that they:
1) deliver mode shift from road to rail or water without adversely impacting passenger services (existing or planned) and without generating significant increases in street-based movements
2) reduce traffic volumes within London
3) reduce emissions from freight and servicing trips
4) enable sustainable last-mile movements, including by cycle and electric vehicle.
The above is a quotation from the plan document

PTWs should be referenced on point 4

PTW’s are vital to the delivery of goods and always will be. Freight applications are far more credible for PTWs in many circumstances than any other mode of transport. Excluding them form specific references discriminatory.

User: TUC London, South East and East of England

Policy T7: Freight

1. We support modal shift from road to rail and urge the London Plan to protect sites that will be potentially needed for development of transport hubs for freight services.

User: Highways England

Highways England strongly supports **Policy T7** and in particular **Part A**, which promotes the provision of freight and servicing strategies for OA Planning Frameworks, Area Action Plans and other area-based plans, **Parts D and G**, which support out-of-peak deliveries and **Part E** that seeks to deliver a mode shift from road to rail or water, reduce traffic and reduce emissions from freight and servicing trips and enable last-mile movements.

With regards to last-mile trips, HE would be keen to engage with the Mayor and TfL on this to explore expanding this beyond the GLA. This currently features in the areas for consideration within the M25 SW Quadrant Study.

User:	Mr Dave Reynolds

The proposed Slade Green Freight Terminal does not comply with these aspirations. In Particular it is close enough to the River to have incorporated a River access and Jetty in order to transport the rail terminal freight to/from barges for distribution/collection in London. It must not use and cause pollution and congestion on Bexley & Greenwich Road Networks.

User:	Just Space

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

User:	London Borough of Bexley

Part E of **Policy T7 Freight and servicing** sets out criteria for development proposals for new consolidation and distribution facilities. The majority of schemes for distribution facilities (Class B8) in Bexley would not meet the policy requirements, particularly **Part E(1)**, without which local employment and regeneration would be diminished. Bexley is attractive to many operators due to the close proximity of the M25 and inner London and therefore these facilities are mainly road based. The words '*be supported provided that they*' should be replaced with '*where possible*.'

User: LEVC

Policy T7 Freight and servicing

- LEVC would like to see a clearer definition of freight vehicles in this section of the draft plan – specifically to include light commercial vehicles (LCV). For the purposes of the measures set out in the plan, ‘freight’ should apply to N1 category vehicles and above.
- LEVC agrees with the Plan’s commitment to reduce emissions from freight. LEVC’s forthcoming production of a range-extended electric LCV will greatly help reduce emissions from van travel across London.
- LEVC also fully supports other measures to reduce freight emissions such as sustainable last-mile schemes and the provision of rapid electric vehicle charging points for freight vehicles, and would note that a dedicated 50kW+ rapid charging network dedicated to taxis and commercial vehicles is essential to the successful operation of these vehicles in London.
- Where possible, LEVC would encourage the Mayor to exercise powers to deploy a 50kW+ rapid charging network which is strategic and planned for current vehicle demand and future uptake of electric vehicles.

User: Veolia

Collection times - As we will likely see the introduction of electric refuse collection vehicles in the near future in London, making significantly less noise, we believe this provides an opportunity to explore night-time working so as to reduce congestion on the roads during peak times. Night-time working was adopted during the 2012 Olympics and was deemed successful, having received very few complaints from local residents. During this period of night-time working Veolia also recorded efficiency improvements in terms of shift productivity and fuel consumption.

Waste consolidation - Business Improvement Districts (BIDs) such as in the West End could be a good option for SMEs that aren't tied into national waste management contracts (as would be the case for many large chains). This would reduce the number of refuse collection vehicles on the road at any one time, helping to ease congestion and improving air quality. However we have found with the existing BID there is little enforcement over waste carriers working during times they shouldn't be.

Digital solutions - Smart technology including bin sensors can help to improve the efficiency of waste management. We have deployed bin sensors onto some of our large commercial bins, so we collect them only when they are full. However this technology will not be suitable for all bin types; and refuse collection vehicles need to be able to collect enough bins on a round to make the journey economically and environmentally worthwhile. Nevertheless, data can be very useful to inform decisions, such as route optimisation. In the future it may even be possible to share some of this data with consumers to help drive behaviour change, such as London has recycled X tonnes of waste on that day.

User:	Federation of Small Businesses

Despite paragraph 10.7.1 which notes that an efficient freight network is necessary to support the function of the city, Policy T7A is restrictive and does not facilitate the efficient operation of freight and servicing activities which are vital to London. Some of the other policies in this section seek to safeguard or provide for freight and servicing but the overall tone is of restriction and reduction but not efficiency.

User:	Federation of Small Businesses
Wharves and railheads should also be safeguarded for unit loads as well as aggregates.	

User:	Federation of Small Businesses

FSB London supports this proposal as longs as there is no compulsion on small and micro businesses to take deliveries at hours that lead to the business owner working excessively long hours.

User:	Federation of Small Businesses

FSB London supports this proposal as long as there is no compulsion on small and micro businesses to take deliveries at hours that lead to the business owner working excessively long hours.

User:	Federation of Small Businesses

We support this and are keen for small businesses to be a part of these discussions to ensure the large and small business supply chain works in synchronicity.

User: SEGRO

Draft Policy T7 states that Opportunity Areas Planning Frameworks, Area Action Plans and other area-based plans should include freight and servicing strategies. These should seek to:

1) reduce freight trips to, from and within these areas
2) coordinate the provision of infrastructure and facilities to manage freight and servicing at an area-wide level
3) seek to reduce emissions from freight and parcel delivery, such as through sustainable last-mile schemes and the provision of rapid electric vehicle charging points for freight vehicles.

We support the acknowledgement of the need for last mile services as part of a strategy to manage freight movement and courier services. These last mile services are much more responsive to the needs of customers, are being increasingly used throughout the urban logistics sector to increase efficiency and productivity.
These models are also more cost effective for logistics operators, as freight and courier efficiencies are improved, which reduces fuel and electricity costs and travel times/distances from the industrial facility to the consumer. These efficiency gains have significant transport network benefits, as the number of vehicles required to distribute goods are significantly reduced.

A significant constraint on being able to improve freight efficiency is the availability of industrial space/land in and around consumer markets. This links to Draft London Plan Policy SD4, which seeks ‘sufficient capacity for industry and logistics should be identified and protected, including last mile distribution, freight consolidation and other related service functions within or close to the CAZ and Northern Isle of Dogs to support the needs of businesses and activities within these areas.’ Therefore, a significant constraint on being able to improve freight efficiency is the availability of industrial sites in central urban locations.

As per Section 4 of these representations, we urge the Mayor to plan for new provision of last mile facilities in and around central locations, and have suggested alterations to Policy SD1 Opportunity Areas and Policy SD4 and The Central Activities Zone (CAZ) as a solution to this – see appendix for proposed policy revisions.

User: UPS

We welcome the introduction of the Agent of Change principle which places the responsibility for mitigating noise onto the new development. We would also propose that this principle should be expanded to cover more than noise. For example vehicle movements/traffic.

There is direct relevance to the UPS Kentish Town facility which has been operating at the site for approximately 20 years. There are discussions around a residential development nearby and we want to avoid costs from having to soundproof residential buildings. Also, need to ensure there are no issues with traffic as there are intense periods of the day where our vehicles are leaving and coming back to facility. These time periods are fixed and we would not be able to change the times when vehicles arrive and leave our facility as this is dictated by the needs of our customers.

SMART Grid Technology

In addition to the conventional grid upgrade that we undertook, UPS worked with a consortium to deploy a radical new technology solution with the potential to dramatically reduce the cost of recharging a fleet of electric vehicles.

Recharging a fleet of electric vehicles can be rendered cost-prohibitive by the need for expensive external power grid reinforcement work. To overcome this, the consortium, which comprises UPS, UK Power Networks and Cross River Partnership, has commissioned a combined smart-grid and energy storage system at the UPS operation in central London. The initiative was supported financially by the UK's Office for Low Emission Vehicles. It has had the immediate effect of raising the number of 6-7.5 tonne vehicles that can be recharged simultaneously overnight from the electricity power supply available at the site from 65 to the whole 170 fleet without any further external grid reinforcement work.

Believed to be a world first to be operating live at this scale and combining both smart-grid and energy storage technologies, the intention of the consortium is to produce a strategy for how the solution could be used in other UPS facilities and beyond to electrify fleets cost-effectively. UPS believes the day is rapidly drawing closer when the cost of an urban distribution electric vehicle, including the necessary power supply investments, will be lower than that of its diesel counterpart. This breakthrough will be instrumental in enabling electric vehicles to be deployed in scale in the world's cities, itself an essential component of tackling the air quality challenges that those cities face.

It is our contention that a lack of grid capacity is preventing private companies from investing in electric vehicles, inhibiting the ability of cities like London to achieve its goal of cleaner and more sustainable vehicles.

Take up of electric vehicles by the private sector is crucial to improving air quality in urban areas. For example, UPS's electric vehicles are significantly more carbon efficient than their diesel equivalent well to wheel. Replacing diesel vehicles with electric vehicles saves around 1.9 tonnes of CO2 and 181kg of NOx per vehicle per year. Therefore, UPS would urge local authorities to consider how increased uptake of electric vehicles can be addressed, especially through addressing energy supply constraints.

User: UPS

Development proposals for new Consolidation and distribution facilities:

UPS would like to highlight that most major logistics companies already consolidate their delivery volumes to ensure efficiency in operations and delivery routes. Whilst consolidation centres may provide value for smaller delivery companies, it could cause duplicate package handling and increase vehicle movements. It would also need to be clear what type of packages the consolidation centre will handle as more specialist deliveries – i.e. food and refrigerated goods or sanitation would require different storage and handling to other goods. It is also imperative that you are able to protect data integrity around the package information. Once packages are handed over to the consolidation centre – who now owns the final mile delivery and how is the package data retained to provide visibility and transparency for the customer, end consumer and the logistics companies?

Deliveries made outside of peak hours and in the evening/night-time:

Whilst we welcome ways to reduce congestion and allow more efficient operations, we would caution that not all deliveries could happen outside of peak hours. The core of our delivery business is early morning and morning deliveries which is dictated by the needs of customers. By not allowing London businesses to receive key deliveries first thing in the morning could hamper their competitiveness in the global market.

We would also urge Greater London Authority to consider other innovative ways of ensuring the feasibility of sustainable delivery and logistics. In our current *Low Impact City Logistics* project in London, which utilizes an electrically powered bicycle and trailer, we are limited by the capacity of the trailers to carry sufficient volume of packages to make the system viable. Our goal is to be able to place a large container in a “staging area” within central London that would allow the handler (or handlers) to continually refill the trailer throughout the day and carry out final mile deliveries. We have undertaken a similar project in Dublin, placing a container or “eco-hub” in a central location and allowing both walker and cyclists the ability to continually “refill” throughout the day and carry out deliveries in central Dublin. In London, we have been working with City of London to identify locations (mainly within underground car parks) in which we could place a container. In UPS’ experience, we have found that space being available for downtown container staging, e-tricycle parking and charging availability to support sustainable final mile deliveries, have all proven to be crucial in ensuring we can, on a practical level, carry out our operations in a sustainable manner.

User:	UPS

As outlined above, finding innovative ways of sustainable delivery pertains to missed deliveries as well. UPS is looking at multiple ways to address this issue. One way is UPS Access Points which allow customers to collect or drop of packages at local shops or businesses (newsagents, petrol stations, dry cleaners) that are conveniently located near to their home or work. Another option we use in other markets are parcel lockers. These along with the “eco-hub” mentioned above could be another option for collecting and dropping off packages by electric bike or walkers. But again, we would like to highlight the need for support for these projects to find spaces in central locations with adjacent charging points to re-charge electric bikes.

User: London Assembly Transport Committee

Current wording:

F. Development proposals should facilitate sustainable freight and servicing, including through the provision of adequate space for servicing and deliveries off-street. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments.

G. Developments should be designed and managed so that deliveries can be received outside of peak hours and in the evening or night time. Appropriate facilities are required to minimise additional freight trips arising from missed deliveries and thus facilitate efficient online retailing.

Suggested changes:

- The policy should refer to the Mayor's target for all of London to be within a 30-minute drive of a construction consolidation site
- The policy should seek to reduce the number of personal deliveries being made within central London.

Suggested wording:

F. Development proposals should facilitate sustainable freight and servicing, including through the provision of adequate space for servicing and deliveries off-street. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments. Development proposals for construction consolidation centres should be located in such a way as to cover all of London within a 30-minute drive.

G. Developments should be designed and managed so that the overall number of personal deliveries received on the site is minimised , and so that deliveries can be received outside of peak hours and in the evening or night time. Appropriate facilities are required to minimise additional freight trips arising from missed deliveries and thus facilitate efficient online retailing.

Evidence in support of changes:

After a period of stability, LGV traffic has increased from 3.8 to 4.2 billion kilometres per year since 2012 (11 per cent) while HGV traffic has remained stable at 1.0 billion kilometres per year.[1] Vans make up around 80 per cent of commercial traffic in London, and are responsible for almost all the recent growth in freight traffic.

The growth in freight traffic is a reflection, generally, of the growth of London's population and economy. But the fact that van traffic has outstripped lorry traffic suggests other changes are contributing to the trend, including the restrictions placed on lorries, and the increasing popularity of internet shopping.

Internet shopping has increased significantly in recent years. In October 2011, 9.4 per cent of all retail spending was online. In October 2016 this had increased to 15.2 per cent.[2] This changes traffic patterns as more vans are deployed, visiting more locations as they deliver packages to consumers and businesses. Traffic is also created by people returning items they have bought online.

Personal deliveries also cause an increasing amount of freight traffic. TfL has banned staff from receiving personal deliveries at work and urged other companies to do the same.

Freight consolidation has been effective at reducing delivery traffic. The Mayor is now promoting the use of consolidation centres. In his new Transport Strategy, he has set an ambition for all of London to be within a 30-minute drive of a construction consolidation centre. The London Plan should reflect this policy.

[1] *Traffic volume – kilometres*, Department for Transport, 2016

[2] *Retail sales in Great Britain: October 2016*, Office for National Statistics, November 2016; *Retail sales, October 2012*, Office for National Statistics, November 2012

User:	British Property Federation

We support the Mayor’s policy on freight and servicing however, as with other areas with the plan, it will take time for these policies to bed in. In order for the policies to work for all we would like to work with the Mayor to make sure this policy works for our members and Londoners and make sure that there is no short-term ramifications when adopting the policy.

User:	Freight Traffic Control 2050 academic project

Needs to be reflected in policy SD1A which currently doesn’t include any reference to freight (goods and servicing). Also needs to include that the goods and servicing needs of Opportunity Areas are assessed at the planning phase (both for commercial and residential development), so that adequate freight transport infrastructure can be accommodated into the plans. This includes suitable on- and off-street loading/unloading infrastructure and innovative schemes for last-mile deliveries to residents.

User:	Freight Traffic Control 2050 academic project

Designing new sites for 24-hour operations will not overcome existing barriers to increasing off peak goods and servicing operations at sites due to such design specification would only apply to new builds, whereas many existing sites are subject to time restrictions of goods deliveries and collections imposed as part of planning conditions, or on environmental health grounds due to noise. Much progress on off peak deliveries has been achieved in other cities outside the UK, which has targeted the achievement of quieter delivery operations (associated with the vehicle, driver, materials handing activities, loading bay and handling equipment) and which has facilitated off peak delivery activity that that London could learn from.

User: Freight Traffic Control 2050 academic project

The MTS has placed much emphasis on freight consolidation and the use of consolidation centres, probably located in outer London that are capable of handling larger product flows ultimately destined for offices, shops, hospitals, hotels, council and governmental buildings, construction sites and other land uses. The urban consolidation centres do not necessarily need to be stand-alone dedicated, purposebuilt facilities. Instead, in order to make them economically viable they are likely to be shared-use warehousing sites. However, the Mayor has provided little in the way of funding or site provision to encourage these developments and overcome the additional operating costs that can be involved in introducing this additional leg into the logistics supply chain.

As previously mentioned against policy SD4M, several innovative, sustainable freight transport operations require the use of small, suitably located depots especially in inner and central London. However, at present market forces mean that such land is unaffordable to logistics operators. However, the Mayor, London boroughs and other public sector organisations have considerable land portfolios that are not needed for their current business. There is therefore scope for these public sector organisations to find ways in which suitable land can be made available at affordable prices for sustainable freight transport and logistics operations. Given the stated sustainable transport aspirations of London’s Mayor and its 33 boroughs this would seem to be a good opportunity to demonstrate and support integrated land-use and freight transport planning in London. However, most of these public organisations seem more concerned with income generation and maximisation (through releasing such land for uses and developments with higher financial returns than logistics). This is leading to a fundamental mismatch between the stated sustainable freight transport objectives and targets and sufficiently strong policy actions needed to support and achieve these sustainability objectives.

User:	Freight Traffic Control 2050 academic project

Ideas that should be explored as means by which to reduce freight trip generation and improves the operational efficiency of these freight activities in London include: considerations of how planning law could be used (in relation to either new builds or all buildings): (i) to require that occupiers of multi-tenanted buildings to share goods and service suppliers (i.e. collaborative procurement), (ii) how new builds could be required to include specified levels of on-site storage (as such space has been diminishing in shops and offices for many years in London resulting in increasing frequency of small delivery quantities and hence vehicle trip generation), (iii) the requirement for suitable off-street space in new builds over given sizes for vehicles providing goods and services (to reduce the use of on-street kerbside while delivery and servicing takes place), (iv) the mandatory use of off-site consolidation facilities for certain, frequently-delivered but non-time critical goods, (v) the requirement for concierge services in multi-tenanted buildings (so that providers of goods and services do not need to penetrate deep into buildings and upstairs via lifts and staircases – all of which extends vehicle dwell times which usually takes place onstreet), (vi) the use of financial charges related to exceedances of agreed goods and service vehicle trip generation rates, or conversely business rate reductions based on less-than-agreed freight vehicle trip rates at buildings.

User:	Freight Traffic Control 2050 academic project

In order to ensure that last-mile deliveries associated with online retailing are efficient and sustainable and that ‘failed’ delivery rates are reduced consideration needs to be given to appropriate charging and taxation interventions in order to address the externalities arising from this freight activity (and which is likely to continue to increase at a rapid rate based on current online retailing forecasts. Action is needed to prevent the delivery service levels offered by retailers becoming everfaster, resulting in smaller vehicle payloads and further vehicle trip generation).

User: Freight Traffic Control 2050 academic project

Although Delivery and Servicing Plans mandated on new builds over a given size are supposed to address freight sustainability and efficiency issues, in reality at present they are typically unenforceable and subject to little, if any, monitoring. For this policy to have any impact they need greater thought in terms of how to apply to them to new builds where they are imposed on a developer and subsequent tenants can argue they did not agree to them. Plus greater resources are needed to monitor developments subject to a DSP to ensure that it is being complied with. Consideration also needs to be given to whether there are mechanisms by which DSPs could be applied to existing buildings as well as new builds.

As mentioned in response to policy SD4M, several innovative, sustainable freight transport operations require the use of small, suitably located depots especially in inner and central London. However, at present market forces mean that such land is unaffordable to logistics operators. However, the Mayor, London boroughs and other public sector organisations have considerable land portfolios that are not needed for their current business. There is therefore scope for these public sector organisations to find ways in which suitable land can be made available at affordable prices for sustainable freight transport and logistics operations. Given the stated sustainable transport aspirations of London’s Mayor and its 33 boroughs this would seem to be a good opportunity to demonstrate and support integrated land-use and freight transport planning in London. However, most of these public organisations seem more concerned with income generation and maximisation (through releasing such land for uses and developments with higher financial returns than logistics). This is leading to a fundamental mismatch between the stated sustainable freight transport objectives and targets and sufficiently strong policy actions needed to support and achieve these sustainability objectives.

User:	New West End Company

We believe that the London Plan should give more guidance and consideration to :
? creating consolidation centres for freight reduction and sustainability (e.g. food waste)

User:	London Environment Directors' Network (LEDNet)

Policy T7 Freight and servicing

A Opportunity Area Planning Frameworks, Area Action Plans and other area-based plans should include freight and servicing strategies. These should seek to:

2) coordinate the provision of infrastructure and facilities to manage freight and servicing**, and promote freight consolidation and micro-consolidation,** at an area-wide level

3) seek to reduce emissions from freight, such as through sustainable last-mile schemes, ~~and~~ the provision of rapid electric vehicle charging points for freight vehicles**, collaborative strategies and reverse logistics arrangements.**

User: Amazon UK Services Limited

Policy T7 – Freight & Servicing

It is critical that sufficient industrial land is made available in order to provide logistics facilities close to major centres of population, such as London and that land availability does not compromise the requirements of specific logistics operations in terms of loading and servicing areas, HGV parking, vehicle holding areas, car parking etc.

The London Industrial Land Demand Report (June 2017) demonstrated the difference between the London Region and the rest of the UK in terms of the growth of logistic floorspace. Based on data from the Department for Transport it concluded that "around 10% of goods lifted in both the South East and East of England regions had a London destination. The report notes the supply constrained nature of the growth. The report projects demand for warehouse land at 280 ha in the period to 2041, however it is important to note that this is based on higher plot ratios, and that if more traditional densities were used this could increase the demand to 402ha. We therefore consider that the plan-making policies in the new London Plan should go further to assess local needs for logistics floorspace and to provide for the needs in full. There would be obvious sustainability benefits to reducing London's reliance on English Regions outside of London to service the growing requirement for goods and changing modes of consumption.

Draft Policy T7 supports new distribution facilities subject to a number of criteria. Part E.1 of the policy seeks to deliver a modal shift from road to rail or water. No qualification is provided regarding this requirement. Amazon consider that this policy needs to include greater flexibility whereby it is recognised that it is not always possible for new distribution facilities to be connected by/utilise rail or water transport. The problem is compounded by the supply of suitable and available land to facilitate new logistics facilities and competing uses.

At the very least Amazon suggest the following amendment to the wording of Part E.1 of Policy T7:

"E. Development proposals for new consolidation and distribution facilities should be supported provided that they:

*1. **where practicable,** deliver mode shift from road to rail or water without adversely impacting passenger services (existing or planned) and without generating significant increases in street-based movements" [underlined text is Amazon proposed amendment]*

However, in the interests of seeking to support a strong and competitive economy, Amazon would urge the London Plan to adopt a policy that is more positively worded by removing this criterion.

User:	London Industrial and Logistics Sounding Board

Freight and Servicing (T7)
Whilst ILSB are in favour of the Plan’s aims to facilitate sustainable freight movement in London, strategic and major road infrastructure networks is not given enough prominence. We would encourage collaboration to ensure road infrastructure is developed and strengthened in the right way, particularly along the A10 M25 and M11 routes to strengthen supply chains with both existing and future economic clusters

User:	Living Streets

We support policy T7, and we would expect it to include TfL's 'Direct Vision Standard' and reference the developing Star Rating scheme and HGV Safety Standard Permit Scheme.

User:	Brixton Society

T6, Parking: We urge that provision for electric vehicle charging points is included in any substantial parking provision for commercial or leisure uses.
We are concerned to note the shrinking number of conventional petrol stations, so provision for refuelling with lower-emission fuels (hydrogen, LPG, CNG) should also be encouraged. This also applies to policy **T7.**

User: London Travel Watch

London TravelWatch has no remit for freight transport unless it affects the use of London’s passenger transport networks and streets.

Freight consolidation outside of congested areas is desirable, but difficult to achieve. Sub-policy T7 D is supportive of freight consolidation sites and is supported.

Retiming of deliveries away from the peak hours would benefit those we represent. New development should facilitate out of hours delivery where possible.

London’s streets are often narrow and difficult to negotiate. Some sizes of lorries are not appropriate, however beneficial large payloads are to business. This has implications for many aspects of how the public perceives London’s streets. Development control should restrict inappropriately large vehicles where it can be justified and the Mayor should seek to reduce the use of London’s streets by inappropriately large lorries, perhaps using management plans for sites or considerate constructor agreements.

User:	London Travel Watch

Freight consolidation outside of congested areas is desirable, but difficult to achieve. Sub-policy T7 D is supportive of freight consolidation sites and is supported.

User: John Lewis Partnership

Policy T7 Freight and servicing *page 430*

As with Policy T2, the overall view relating to freight and deliveries needs consideration. There should be recognition of the vital role that deliveries and servicing plays in people's everyday lives, for John Lewis and Waitrose deliveries to our stores, work and home addresses. The freight industry including John Lewis operates its vehicle fleet on tight margins and delivery windows and is always looking to optimise efficiency. The role that he Mayor, TfL and the boroughs can play is in supplying the right policy support such as reforming the London Lorry Control Scheme, reviewing night-time delivery restrictions and ensuring appropriate kerbside access is available at the times of day required.

Section 10.7.2 states that 'lorries and vans are often less than half full'.

Much of the van traffic on London's roads is engaged in servicing activity rather than deliveries and will therefore not be full to capacity with goods as that is not the main use of the vehicle. Many trips will be multi-drop and therefore it will be impossible for them to be full at all times. For example, John Lewis home delivery vehicles will always start their journeys full and the load will diminish as deliveries are carried out. Waitrose and John Lewis distribution vehicles will again start with a full load, and after delivery will often bring loads back from stores for example empty goods cages and stock. This is not to say that there is no opportunity for greater efficiencies, but the wording of this section needs to be reviewed.

Consolidation and distribution centres

Many operators will already have heavily consolidated deliveries as part of their supply chain; retail is a good example of this. The John Lewis Partnership has regional distribution and delivery centres in North ,South & West London, Kent & Berkshire.

'Consolidation centres' can play a role in controlling and potentially reducing the number of freight vehicle movements into urban centres in certain circumstances. However, they should be targeted at vehicles which are not full to capacity rather than breaking up fully consolidated loads, as this could lead to more vehicles on the road, not fewer. In addition, consolidation centres would not work for time-critical deliveries such as fresh produce express mail and parcels.

The question of funding is also important as adding another link to the supply chain will incur cost, so it is likely that there will need to be some ongoing public funding. Consolidation centres only work if they are in the optimum strategic position. The lack of industrial land due to rising land values in London is pushing distribution sites out of the capital, leading to longer journeys and also an increase in vehicle movements. This is because EU Drivers' Hours rules limit the number of hours a driver can drive, effectively governing the length of a shift. In addition, companies have customer service levels to meet, so if journeys take longer to complete, then logistics firms are likely to react by increasing the numbers of vehicles they deploy, adding to costs, emissions and congestion.

Retiming

To enable more deliveries to be retimed, the John Lewis Partnership urges the Mayor to work with boroughs to review night-time delivery restrictions; with London Councils on their review of the London Lorry Control Scheme; and with businesses to procure goods and services in a way that minimises freight movements, particularly at peak times.

Direct vision

The plan refers to the use of vehicles with increased direct vision (on page 233 and under the list of transport schemes on page 408). Standards for HGVs should be set at a national or international level as manufacturers design vehicles for a European market not by individual cities. This could lead to London becoming a niche market for the manufacturers, increasing the costs of new vehicles.

There must be a clear evidence base for new standards, otherwise we cannot be sure that the additional investment required will actually lead to improved safety. Whilst increasing direct vision has a role to play, it not the most effective way of addressing safety issues and technical developments will mitigate the requirement for improved direct vision. Often cameras and mirrors will give drivers a view that no amount of direct vision will be able to replace, this can also incorporate ongoing driver safety training. The John Lewis Partnership welcomes the announcement by TfL in September 2017 recognising that a more holistic approach should be adopted for the scheme to be introduced in 2020. However, the details of what the new 'safe system' will look like and how the permit scheme will be administered are far from certain and the delays in confirming which vehicles will be affected is significantly disrupting operators planning to achieve the ULEZ requirements in 2019.

Freight Commissioner

Until the end of last year, Transport for London had one of the most established and experienced freight teams in the world. However, now freight is embedded across TfL rather than sitting in one distinct team. Whilst this may have benefits in terms of ensuring that freight is considered in every aspect of TfL's work, there is also a concern that it may be diluted. The appointment of a Freight Commissioner for London to create a vision for enabling efficient logistics and to develop a world-class freight and logistics environment in the capital would bring significant benefits. A Commissioner, working directly under the Mayor, would help ensure the effective implementation of the London Plan and the Mayor's Transport Strategy for freight.

User: Institution of Civil Engineers - London region

Freight

ICE London believes City Hall and TfL should make a long term commitment to vehicle consolidation centres and provide strategic leadership in order to reduce the level of emissions from goods vehicles. TfL and the GLA should actively promote the use of consolidation centres (whereby vehicles consolidate their loads at a centre near the delivery point). This should be done by investing in new consolidation centres in construction, freight, waste, recycling, delivery and ‘last mile’ deliveries.

With additional capacity on London’s waterways, we believe the Mayor should incentivise use of commercial wharves along the river, for example through the use of a London Wharf Grant. To encourage this, an additional grant to freight companies looking to switch from road to river transport could be offered.

User:	London Borough of Sutton

SUPPORT WITH CONDITIONS. The London Borough of Sutton supports measures to reduce the impact of freight on local roads and in town centres but would welcome support for more enforcement powers to reduce the impact of multiple deliveries, particularly at peak times.

User: Centre for London

Policy T7 Freight and servicing

We endorse the overall approach set out in this policy. *Street Smarts* made specific recommendations in relation to using spaces like car parks for micro-consolidation, and establishing zero-emission delivery zones:

· "Boroughs should encourage off-site consolidation by utilising assets such as underused car parks to provide micro-consolidation and last-mile delivery capacity for SMEs, establishing zero-emission delivery zones around certain business districts, and leading by example by consolidating procurement practices. BIDs and business estates should also coordinate on and off-site consolidation.

User: Chartered Institute of Logistics & Transport

Despite paragraph 10.7.1 which notes that an efficient freight network is necessary to support the function of the city, Policy T7A is restrictive and does not facilitate the efficient operation of freight and servicing activities which are vital to London. Some of the other policies in this section seek to safeguard or provide for freight and servicing but the overall tone is of restriction and reduction but not efficiency. Nevertheless we welcome Policies T7 C and E which safeguard wharves and railheads for aggregates and proposals for rail and water related distribution facilities, although the reference to adversely impacting passenger services should be deleted as it could inhibit making sensible use of off peak capacity for freight. The London Plan should learn from the lessons of the 2012 Olympics and commit to significant engagement with freight operators. It is disturbing that TfL seems to be losing all its freight expertise.

User: North London Waste Authority

We agree with policy T7- Freight and servicing, which states that Opportunity Area Planning Frameworks, Area Action Plans, and other area-based plans should include freight and servicing strategies. We would suggest a new point A2 could be added to include reference to consolidation and micro consolidation centres in terms of infrastructure and facilities to manage freight and servicing. We suggest point A3 could also include collaborative strategies and reverse logistics arrangements (taking disused products back to producers) to reduce emissions from freight as a whole. We also support point E to support new consolidation and distribution facilities, and H, to support micro consolidation as this can help to support effective reuse of transit packaging materials.

- It is important to note that without adequate provision for reverse logistics the circular economy aspirations for the capital will be more difficult to achieve. We believe a circular economy approach would benefit from combined freight facilities for both products and secondary resources.
- From the waste management perspective, it is also important to recognise that a network of waste treatment facilities that are designed to operate at optimal economies of scale (to minimise costs and incorporate the best environmental controls) is likely to require a number of supporting waste transfer stations. This is so that the relatively small loads in waste collection vehicles travel relatively short distances, and that the longer journeys to waste treatment facilities are then done in relatively large loads to minimise vehicle movements and impacts.

User:	London Borough of Newham

Policy T7 Freight and Servicing

LBN are generally supportive of the policy with greater emphasis on facilitating sustainable freight and servicing through reduced trips and emissions and out of peak deliveries which is complementary to Newham's Draft Revised Local Plan.

However, T7.E is noted as a particularly difficult test to follow (criteria 1-4) as it is unlikely to be able to delivery a modal shift (to rail or water) in all consolidation/distribution schemes, particularly noting the increasing pressures to support deliveries (including those with 'in-time' requirements) whereby rail or water may not be achievable

User:	Central Bedfordshire

Minerals and Waste

• We welcome and strongly support the overall strategy for minerals and waste, in particular:
• The provision for safeguarding aggregate wharves and railheads (PoliciesT7, SI10 and SI15);
• The emphasis on recycled aggregates, whilst at the same time seeking to maintain aggregate landbanks (Policy SI10);
• The safeguarding of aggregate resources (Policy SI10)
• The reduction and minimisation of waste, aiming at a circular economy (Policy S17);
• Waste self-sufficiency by 2026 (Policy SI8);
• The safeguarding of waste management sites (Policy SI9);
• The ‘Agent of Change’ principle (Policy D12) which will assist in safeguarding existing mineral and waste sites.

User:	Landscape Institute London

LI London is pleased to see encouragement of deliveries at off-peak hours and by modal shift to sustainable last-mile movements, as a significant amount of congestion is due to deliveries – not only to businesses & retail, but to individuals from on-line shopping.

User: Commercial Boat Operators Association

CBOA fully agrees with the statements in Policies T1, T3, T7, SI10 where use of water transport, land availability for waterside access for freight/deliveries, wharf protection and modal shift to water is mentioned. However the wording, in particular the use of the verb ‘should’ where these policies are concerned, is not seen as being strong enough or sufficiently binding. This is on two counts:-

1.It can be easily ignored and reasons easily found and quoted for not using water transport

2.There needs to be more direction, perhaps centrally, to insist that the water transport option is not only investigated but actually put into operation.If simply left to market forces, it will not happen.In our experience over many years, water transport is very rarely used if there is no form of coercion to use it.This is true for both the construction industry and other delivery or small freight operations.Also, local authorities are sometimes wary of being too dictating about use of water transport – they need support to advocate it.

User:	London Borough of Ealing

Freight and Servicing
(T7)

The Council supports this much revised and expanded policy. In particular, we support consolidation, modal shift, deliveries off-street and promoting deliveries at different times of the day and night in order to reduce congestion and air quality impacts.

User: London Chamber of Commerce and Industry

Policy T7 Freight and servicing

109. Congestion in the capital, and related issues of safety and pollution, are increasingly in the public eye. It is essential, however, that there is recognition, when considering measures to reduce congestion and improve quality of life, of the economic purpose of journeys and their role sustaining the capital's 24/7 economy

110. For example, the draft London Plan has rightly identified rising levels of freight traffic as one of the main issues to be tackled by 2041. Freight plays a vital, if not always appreciated role, in our everyday lives. From stocking our high street shelves to supplying the raw materials we need to sustain our growing population, demands on the capital's freight industry have never been higher.

111. LCCI welcomes the recognition within the draft London Plan of the role of freight and by TfL though its various freight related work streams and forums, through which it has sought business input. Nonetheless, given the essential role that freight plays in meeting the growing demands of businesses and residents, LCCI has called on the Mayor of London to appoint a Freight Commissioner at City Hall.

112. The development of the 'Heathy Streets Approach' by the Walking and Cycling Commissioner underlined the strategic direction that such an appointment can bring. We believe a Freight Commissioner can lead on the recommendations made in the London Plan and ultimately help deliver a world-class freight and logistics environment in the capital – more important than ever with demand high and London's roads under pressure.

User: DPDgroup UK Ltd

Policy T7 – Freight and Servicing

Policy section T7 highlights most clearly to DPD the GLA's lack of understanding of the CEP sector. This section presents a number of points that DPD is strongly opposed to. It is stressed that DPD has experience of successful alternative operating methods that should be considered. The freight industry cannot be generalised. This section needs to address as the freight industry in a sector specific way, with particular focus on the CEP sector. DPD's position on consolidation is covered a dedicated section.

In general, reducing freight trips to areas can only be achieved by final mile delivery depots to final point of delivery that equally will increase the feasibility of alternative and electric fuel vehicles. The change to 24-hour operation has consequences on the local residents although the use of electric vehicles will reduce these consequences. If 24-hour operation is to be progressed then this has to go hand in hand with the agent of change policy to protect operators.

DPD has investigated the shift of mode from road to water or rail. The consumer demand and next day delivery expectations of London residents make this unworkable. DPD is currently running some deliveries from London City depot using bikes but as we strive to increase productivity capacity this becomes an issue. There is also currently a lack of mass produced cargo cycle that fits our need for remoding to cycle delivery however DPD are working on a smaller final mile all electric delivery vehicle that will be launched in 2018.

DPD and the large CEP operators have a developed pick up shop network that increases the rate of first time delivery success. First time delivery is important to all CEP operators. Every reattempt affects productivity and increase van mileage and congestion. It also affects commercial viability as ultimately the operator gets paid for one delivery. Technology is delivering improvements through DPDs award winning app where consumers can schedule deliveries and receive advanced notification of delivery times. It is likely this technology will expand across the CEP sector. The parcel storage locations have also been discussed but security concerns arise and we believe that the best method of ensuring first time success is a delivery to the pick up shop network.

Consolidation

DPD and other CEP operators already consolidate within the supply chain. Parcels are taken from many suppliers and deliver them in one vehicle to one locality – consolidation centres simply add a stage to this already efficient operation. For already efficient CEP operations, consolidation does not reduce the number of vehicles on the road; it simply changes the profile of the delivery routes. If London has 1million cubic meters of parcels to be delivered and each van in the capital has 10cubic meter load space 100,000 vans are required. By consolidating these you simply increase the density of the delivery area but retain the same number of vans undertaking stem mileage from depot to first delivery.

Within the Draft London Plan is a reference to improving van load utilisation; in CEP operations it is wrong to assume load utilisation can be improved. Any operator not operating at 95%+ utilisation will not be in business for long. DPD would like to arrange a site visit for GLA, TfL and borough to evidence this. Delivery vans, by their nature will not be full for the entire day though. When they drive out of the depot they will be full but as the day progresses they deliver and start to empty before undertaking afternoon collections.

DPD has worked hard to establish itself as the UK number 1 for doorstep experience. Consolidation would remove a unique selling point that we have worked hard to achieve. DPDs security, data streams, brand recognition and in flight app options would all be lost if consolidation became mandatory.

The 2012 Olympics consolidation project it was an incredibly poor experience. It was difficult to manage, costly and DPD lost both reputation and brand visibility throughout this process. As a company we pride ourselves on our service levels, if we were to pass our parcels to another carrier who had exclusivity and they were to experience operational issues, whose parcels would be left in the depot? Equally commercial negotiations between carriers would be complex and difficult if exclusive arrangements were made – what were to happen if the consolidator refuses to carry your parcels? Or its dangerous and hazardous goods policies were not aligned?

There are many operational, commercial legal and quality issues that need to be considered before consolidation is forced upon the CEP sector. In short, the strategic goals if London can comfortably be achieved through effective measures that do not require consolidation in the CEP sector.

User: Dr Peter Osmon

I am writing in to register my support, specifically, of London Plan policies regarding Transport of Aggregates: S10 and T7 You should know that London Borough of Barnet Planning Application 17/5761/EIA | Use of railway land for the transportation of aggregates Envisages approximately 1HGV per minute, carrying Aggregates, will enter/return A5 in Cricklewood NW London from/to railway sidings. This Application is evidently contrary to these policies:

Policy S10 Transport of Aggregates
9.10.3 Aggregates are bulky materials---minimise their movement especially by road.

Policy T7 Freight and Servicing
E. Development proposals for new -----distribution facilities----should be supported provided that they
1.deliver mode shift without adversely impacting passengerservices I am concerned about the consequences of Barnet Planning Application 17/5761/EIA for TfL bus services nos: 16, 32, 189, 226, 245, 260, 266, 316, 332, 460 at the A5 (Cricklewood Broadway) A??? (Cricklewood Lane) intersection. This intersection is already a bottleneck due to the narrowness of Cricklewood Lane and it seems likely that the proposed flow of HGVs would have disastrous consequences for the reliability of these ten bus TfL bus services.

User:	Sustrans

Freight and Servicing trips are of particular concern because of their association with road danger (for example, from Heavy Goods Vehicles) and air pollution (approximately 59 percent of nitrogen oxides emissions from road transport sources are a result of heavy commercial vehicles, including buses). We welcome an approach to freight and servicing trips that seeks to reduce them, overall, and optimise vehicle kilometres associated with these trips. As such we welcome,
Policy T7 and clauses A, C, D, G, H in particular.

Clause I should include TfL's 'Direct Vision Standard' and reference the developing Star Rating scheme and HGV Safety Standard Permit Scheme.

User:	Hornsey & Wood Green Labour Party

We favour freight consolidation to reduce the number of freight vehicles in London We favour the development of a ‘London lorry’ of a size more suitable to London streets than HGVs and with good all-round visibility by mirrors and/or cameras. We favour the development of railheads to minimise the transport of freight on streets whilst bearing in mind the congestion which can be caused by siting railheads in heavily built up areas.

Freight distribution by electric vehicles and cargo bikes should be encouraged.

User:	Mr Sydney Charles

T7 should contain strong policies to enable consolidation of deliveries to a non residential space with clean deliveries to homes, offices, pick up points etc by electric van or cargo bikes.

User: Aggregate Industries UK Ltd

Draft Policy T7, Freight and Servicing

Draft Policy T7 is supported particularly with regard to the specific requirement at Part C that: *wharves and railheads for the distribution of aggregates should be safeguarded in line with Policy SI9 Safeguarded waste sites, Policy SI10 Aggregates and Policy SI15 Water Infrastructure.*

User: Cemex UK Ltd

Draft Policy T7, Freight and Servicing

Draft Policy T7 is supported particularly with regard to the specific requirement at Part C that: *wharves and railheads for the distribution of aggregates should be safeguarded in line with Policy SI9 Safeguarded waste sites, Policy SI10 Aggregates and Policy SI15 Water Infrastructure.*

User: Sainsburys Supermarkets Ltd

Policy T7 F

In accordance with our comments in respect of Policy E9 B 4, we object to Policy T7 F on the basis that it is unrealistic to provide off-street servicing on all schemes, particularly convenience store schemes. Policy T7 F does not include any threshold for size or type of development against which it would be applied, and it is completely unreasonable to expect all future development within London to accommodate an off-street servicing solution.

As mentioned within our comments under Policy E9 B 4, a more flexible approach should be adopted which allows for pragmatic and creative consideration based on individual site circumstances, and positive collaboration between all parties to achieve solutions which allow schemes to come forward.

User: DB Cargo UK Ltd

DB Cargo support reference in Part A to requiring Opportunity Area Planning Frameworks, Area Action Plans and other area-based plans to include freight and servicing strategies. These should coordinate the provision of infrastructure and facilities to manage freight and servicing at an area-wide level. This should include co-located facilities for processing, recycling and storage of construction materials and waste. However, DB Cargo consider that the wording should be
amended to be clearer that it is about increasing efficiency of the system in order to reduce trips.

DB Cargo also strongly support reference in Part C to the need to safeguard wharves and railheads involved in the distribution of aggregates in line with Policy SI9 Safeguarded waste sites, Policy SI10 Aggregates and Policy SI5 Water infrastructure. The policy should also recognise the potential to combine processing and recycling of aggregates and waste and in doing so create a more efficient logistics system which reduces HGV movements on the roads.

DB Cargo also support Part E which states that development proposals for new consolidation and distribution facilities should be supported provided subject to a range of criteria including that they should deliver mode shift from road to rail or water.

However DB would question the reference to adversely impacting passenger services (existing or planned). There needs to be a balanced approach to the prioritisation of rail capacity that recognises the environmental and economic advantages of rail fright in the off-peak. The London Plan should also recognise there are often operational reasons (e.g. planned maintenance) why it is not feasible for rail freight to operate at night.

DB Cargo also consider that this part of the policy should make reference to particularly strong support for proposals which integrate transportation, storage, processing and recycling of aggregates and waste and other related industrial activities. Part F should include more explicit reference to the role of rail
freight in reducing the local impacts of construction activity by reducing lorry movements.

DB Cargo support the reference in supporting text for the identification and protection of new sites for load consolidation at a range of scales in central, inner and outer London to aid sustainable last-mile consolidation. However, it should be made clear that sites with rail access will be favored.

DB Cargo consider that safeguarding rail freight facilities should be covered by a separate dedicated policy which would give greater prominence to the importance of these facilities and need to retain them. DB Cargo would be pleased to assist in developing this policy with the London Plan team and through the Examination process.

User: Kent County Council

Kent and the Wider South East play a vital role in connecting the UK to the continent. It is therefore imperative that the transport needs of the Wider South East are also met because of our role in supporting London's growth. To be able to travel easily, safely and quickly from the neighbouring local authorities will be a key driver for London's own economic success.

KCC welcomes the recognition that freight is essential for London's businesses and to supply goods to the public, but that freight could be more efficient. This is particularly true of the timing of deliveries which would be best made outside the peak periods. However, the target reduction of van and lorry use in central London does not seem ambitious enough. The greater use of night time deliveries with due consideration to noise disturbance, should be recognised in the Plan. However, guidance should be sought from the relevant trade bodies and the role and importance of freight in servicing London's population and businesses should not be forgotten.

Part D of Policy T7 refers to how consolidation and distribution sites of all scales should be designed to enable 24-hour operation to encourage and support out-of-peak deliveries. Whilst outwardly sensible, there are cost implications in terms of building the required infrastructure and the increased handling costs which will inevitably be passed on to the consumer. The principle of consolidating deliveries outside the city and then using smaller vehicles to make the 'last mile' journey may result in more individual vehicles on London's roads in instances where one large vehicle would have been making multiple drops. However, where only partially full lorries and vans are making single trips into London there are clear opportunities for consolidation. Once consolidated, if deliveries are made using electric vehicles there will also be air quality benefits. KCC would like assurances that the knock-on effect for Kent of any measures which are implemented by London will be considered fully by you.

Part E of Policy T7 aims to deliver mode shift from road to rail or water. While rail is an ideal mode of transport for the transfer of bulk freight between ports and distribution centres, rail freight has no place operating on busy commuter routes in the peak periods. There have been numerous incidents in recent years (e.g. Lewisham in 2016) where freight train derailments have caused huge delays and disruption to rail passenger services. Rail freight should be scheduled only at off-peak and night-time periods, and then only when necessary to use busy passenger routes through Greater London.

User: UKWA

Despite paragraph 10.7.1 which notes that an efficient freight network is necessary to support the function of the city, Policy T7A is restrictive and does not facilitate the efficient operation of freight and servicing activities which are vital to London. Some of the other policies in this section seek to safeguard or provide for freight and servicing but the overall tone is of restriction and reduction but not efficiency.

The policies should also recognise the need for open yard and storage space

User:	UKWA
UKWA supports this	

User:	UKWA
Wharves and railheads should also be safeguarded for unit loads as well as aggregates.	

User:	UKWA
UKWA supports this.	

User: Cross River Partnership

This Policy is welcome. However, it raises again the issue of the provision of charging points for electric vehicles and this needs to be inter-linked with the references in other Policies and the difficulties around securing sufficient electricity supplies.

One of the recently growing areas of deliveries is items purchased through online shopping by individual members of staff and arrangement for delivery to their office address during the daytime. Para E of this Policy could usefully refer explicitly to this new and growing issue.

CRP's Click. Collect. Clean Air.' behaviour change campaign promotes the use of click & collect services that consolidate deliveries to collection points close to consumers' homes. Analysis of deliveries to participating businesses in central London has shown a reduction in personal parcel deliveries of an average of 50%, and service provider data has shown that 90% of redirected parcels are delivered outside of Zones 1 & 2 where air pollution is the worst.

This Policy should be supported by stronger language encouraging new freight logistic and consolidation infrastructure. Recognition is needed and should be retained, but there is a need for coordinated planning of new infrastructure. A strategic approach is also needed to upscale projects that CRP and its partners have piloted e.g. buyers' clubs, consolidation hubs etc.

CRP has been leading the preparation of an area-specific Freight Deliveries and Servicing Action Plan for the West End Partnership. This will drive projects for area-widecollaboration within the CAZ.

The Policy should be strengthened by mentions of how to deal with the last mile of logistics specifically.

User: UKWA

UKWA finds that is restrictive and does not facilitate the efficient operation of freight and servicing activities which are vital to London. Some of the other policies in this section seek to safeguard or provide for freight and servicing but the overall tone is of restriction and should be about increasing efficiency and collaboration.

The policy should also recognise the need for open yard and storage space

User:	UKWA
UKWA supports this.	

User:	UKWA
UKWA supports this.	

User:	UKWA
UKWA supports this.	

User:	London Stansted Cambridge Consortium

Freight and Servicing (T7)

Whilst LSCC are in favour of the Plan’s aims to facilitate sustainable freight movement in London, strategic and major road infrastructure networks are not given enough prominence. We would encourage collaboration to ensure road infrastructure is developed and strengthened in the right way, particularly along the A10, M25 and M11 routes.

User: Unknown

Our client supports the Mayor’s policy on freight and servicing, however, as with other areas with the plan, it will take time for these policies to bed in. In order for the policies to work for all our client would like to work with the Mayor to make sure this policy works for our client’s site and Londoners and make sure that there is no short-term ramifications when adopting the policy.

This document is submitted by WYG Planning and forms the representations of a WYG Planning client delivering a large mixed use Build to Rent (“BtR”) led development in North West London, to the Draft London Plan - The Spatial Development Strategy For Greater London Public Consultation.

User: dp9

Freight and Servicing

19. Policy T7 provides details of Freight and Servicing. BPS welcomes the Mayor's commitment to encourage and support out of peak deliveries but would emphasise this flexibility requires the ability for 24-hour operation and the removal of potentially time restricting planning conditions in developments where
servicing takes place in basements (or equivalent private areas) where noise impacts are mitigated.

20. Policy T7 also suggests that large developments should enable micro-consolidation of goods delivered. Whilst we welcome exploration of efforts to explore micro-consolidation we would urge to Mayor to consider the implications for on-site consolidation on private estates where the responsibility for storing goods has implications for liability and insurances which can be of sufficient cause for concern to deter their operation.

21. RECOMMENDATION: Ensure planning conditions do not place burdensome time restrictions on servicing activity when such activity is able to take place off the public highway in dedicated servicing areas.

User: Roxhill Developments Ltd

Background

Roxhill

Roxhill is a specialist industrial and distributio developer with a track record of progressing large scale, complex projects through to completion. Established in 2010, its property portfolio includes over 750 hectares of land in strategic locations throughout the UK.

Roxhill has extensive experience of rail freight projects, most recently successfully promoting the East Midlands Gateway SRFI that is located next to Junction 24 of the M1 motorway and East Midlands airport. The Development Consent Order ("DCO") for this development was approved in January 2016.

Howbury Park

Planning permission was first granted for SRFI development at the Howbury Park site in December 2007. The current updated Howbury Park proposals comprise the creation of a rail port with associated rail-served warehousing that will help to address the compelling need for an expanded network of rail freight facilities to serve London and the south east.

Roxhill submitted a planning application for an SRFI facility at Howbury Park in 2015 (LBB ref. 15/02673/0UTEA). LBB presented the application to Planning Committee on 16 February 2017, with an Officer's Recommendation for Approval. The Committee resolved to approve the application subject to referral to the Mayor of London. The Mayor subsequently directed LBB to refuse the application on 17 July 2017, in the ground of there being no 'very special circumstances' to justify development at his Green Belt site. In accordance with this direction, LBB refused the application on 20 July 2017.

Roxhill has submitted an appeal to the Secretary of State, with the Public Inquiry due to commence in summer 2018.

Representations to the draft London Plan

The Howbury Park development is of strategic importance to London, with its implementation essential if the City is to achieve a modal freight shift from road to rail, and continue to make progress towards more sustainable freight transport solutions.

It is important that the draft London Plan, when published, provides appropriate policy support to facilitate the delivery of vital freight infrastructure. The following comments are provided in this context.

User: Roxhill Developments Ltd

Policy T7 / Policy E4

Freight and Servicing

Roxhill objects to the removal of current London Plan policy that specifically addresses SRFI development. Policy 6.15 of the current London Plan provides explicit policy support for SRFI developments, in appropriate locations and where wider transport impacts are minimised.

The NPPF identifies a clear priority to provide sustainable transport modes (paragraph 29), and specifically encourages local authorities to develop strategies for the provision of viable infrastructure necessary to support sustainable development, including large-scale facilities such as rail freight interchanges (paragraph 31).

The NPS for National Networks (2014) follows this theme, and clearly sets out the importance of SRFI development, and identifies a 'compelling' need for an expanded network of SRFI facilities, in accordance with Government's conclusions (paragraph 2.56). The same paragraph states that *"[G]iven the locational requirements and the need for effective connections for both rail and road, the number of locations suitable for SRFIs will be limited, which will restrict the scope for developers to identify viable alternative sites".* The NPS highlights the importance of SRFIs in aiding the transfer of freight from road to rail, supporting sustainable distribution and rail freight growth and meeting the changing needs of the logistics industry (paragraph 2-47). It further states that *"there* is *a particular challenge in expanding rail freight interchanges serving London and the South East" (para 2.58).*

In this context, and reflecting Policy 6.15 of the current London Plan, the draft London Plan should be explicit in its support for SRFI development.

The current London Plan Policy 6.15, relating to SRFis, that provides clear policy support for SRFI development, should therefore be re-instated, as follows:

A. The provision of strategic rail freight interchanges should be supported, including enabling the potential of the Channel Tunnel Rail Link to be exploited for freight serving London and the wider region.

B. These facilities must:

a) deliver modal shift from road to rail

b) minimise any adverse impact on the wider transport network

c) be well-related to rail and road corridors capable of accommodating the anticipated level of freight movements

d) be well-related to their proposed markets

Notwithstanding that specific SRFI policy support should be included, Roxhill acknowledges that the draft London Plan does include positive reference to rail freight and intermodal rail freight developments. Draft

Policy E4(A)(5) requires that sufficient land is made available for sustainable transport functions, including intermodal freight interchanges, whilst draft Policy T7(E) specifically requires that proposals for new consolidation and distribution centres deliver a modal shift from road to rail or water. Clearly, a modal shift resulting from a new distribution facility is only achievable through SRFI development.

Whilst this positive policy context is welcomed, Roxhill would question the practicality of also requiring, in draft Policy T7(E)(2), that new distribution facilities reduce traffic volumes in London, and linked to this, the requirement at draft Policy T7(E)(3) that facilities deliver reduced emissions from freight and servicing trips. SRFI facilities (unlike non-rail linked facilities) would help bring about a modal shift, transferring existing traffic onto the railway in accordance with this requirement. However, demonstrating an overall reduction in London traffic would be difficult to evidence, given the complexities of freight traffic movements across the Capital, plus the likelihood that any new floorspace would give rise to an element of traffic generation. The NPS for National Networks, for example, recognises that there are likely to be local impacts in terms of (inter alia) increased road and rail movements from SRFI developments (paragraph 2.51). Hence an alternative reference to minimising any adverse impact on the wid er transport network would be more appropriate , noting that such a requirement would replicate existing policy in the current London Plan (Policy 6.15).

User:	Airport Industrial Property Unit Trust

Freight and Transport

AIPUT welcomes the focus given to freight and transport .We agree that roads will continue to play a vital role in London. Greater priority needs to be given to making them more efficient and delivering long term sustainable, clean freight movements throughout the Capital. AIPUT supports measures and new technology that achieve this and also facilitate continued economic growth, including strong demand for logistics related employment use at the major transport hubs (such as Heathrow Airport).

User:	London Borough of Camden

The Council supports the requirement to reduce mileage and emissions from servicing and deliveries, including retiming away from the peaks, moving from road to rail and water, and consolidation, with last mile by bike and electric vehicles

The principle of car parking design and management plans is supported. However, it is suggested that such plans should also cover cycle parking where appropriate. It is unclear if guidance on the preparation of such plans is available or intended (e.g. in a Supplementary Planning Guidance document or on Transport for London’s website).

User:	London Borough of Camden

This should make reference to securing Construction Logistics Plans through the planning process, which will enable planning authorities to enforce in the event of non-compliance.

User:	London Borough of Camden

This refers to requiring CLOCS compliance which Camden, as a pilot borough for CLOCS, welcomes. However, the scope of CLOCS extends beyond the stated direct vision vehicles. The aim of CLOCS is to drive general improvements to off-site construction vehicle controls and their impacts on road safety for vulnerable road users as well as amenity. It therefore includes a wide range of safety standards, including compliance with FORS for the drivers, and agreement to routings and timings.

User: Battersea Project Land Company Limited

Freight and Servicing

19. Policy T7 provides details of Freight and Servicing. BPS welcomes the Mayor's commitment to encourage and support out of peak deliveries but would emphasise this flexibility requires the ability for 24-hour operation and the removal of potentially time restricting planning conditions in developments where servicing takes place in basements (or equivalent private areas) where noise impacts are mitigated.

20. Policy T7 also suggests that large developments should enable micro-consolidation of goods delivered. Whilst we welcome exploration of efforts to explore micro-consolidation we would urge to Mayor to onsider the implications for on-site consolidation on private estates where the responsibility for storing oods has implications for liability and insurances which can be of sufficient cause for concern to deter heir operation.

21. RECOMMENDATION: Ensure planning conditions do not place burdensome time restrictions on servicing ctivity when such activity is able to take place off the public highway in dedicated servicing areas.

User:	Siemens

1.2.1 eHighway – electrification of road freight transport

In response to Policy T7 Freight and Servicing, Siemens' have developed the technology for an eHighway which makes it possible to reduce use of fossil fuels and truck operating costs. At the same time it eliminates local emissions such as CO2 and nitrogen oxides. Having been trialed in Los Angeles and Sweden this technology has the ability to make freight trips in and around London environmentally efficient. The A13 that runs from Central London to Shoeburyness is a key road for freight transport and could benefit from Siemens' eHighway technology.

User:	Network Rail
Policy T7, page 430 – Freight and servicing: It would be helpful if there is reference here to include the potential for rail freight to support the capital's needs (as noted in point 4 above).	

User: DPDgroup UK Ltd

1. Freight in London cannot be generalised. Each industry sector operates differently and the CEP sector has unique differences in that demand is driven directly by the consumer (Londoners). As such the CEP sector should be handled differently

reflecting the increase in online purchasing. RAC foundation research shows that the CEP sector represents 10% of vans on the road, yet in DPD's experience there seems to be a disconnect between public sector perception and the actual operation. DPD is happy to support the GLA and TfL with data and information to help improve public sector knowledge and understanding of the CEP sector. This approach has proven to be mutually helpful across other UK local authorities. Please don't hesitate to get in contact if there is any data or information you require.

5. DPD and the CEP sector is already a consolidator of freight and should be recognised as such. DPD is strongly opposed to consolidation centres for parcel and courier deliveries due the increased handling, reduced reliability and questionable

ownership of the consignment. This has proven not to work in the CEP sector and is explored as a dedicated section within this consultation response.

6. DPD has concerns with the restructuring of freight responsibilities within TfL. It is felt that the dedicated Freight Team with its knowledge and experience was well placed to credibly understand and represent the industry, including the CEP sector. The dilution and fragmentation of the Freight Team and its responsibilities creates industry anxiety and uncertainty that a joined up approach will not be adopted. A dedicated and credible central point of contact should be established and communicated to the industry.

User:	East of England Aggregates Working Party

It is noted that **Policy S/10** (Aggregate apportionment and safeguarding) supports an adequate supply of aggregates to support construction in London, seeks to maintain landbanks and safeguard aggregate resources including aggregate recycling facilities. It also seeks to safeguard wharves and /or railhead facilities with existing or potential capacity for aggregate distribution. EEAWP positively supports this policy and also **policy T7** (Freight and Servicing) and **policy S/15** (Water Transport) which also support the safeguarding of wharves and railhead facilities.

Policy T8 Aviation

User:	Susan Saunders

I live near Heathrow, and it won't surprise you that I am absolutely opposed to expansion there. Anything which flies more aircraft over such a densely populated area cannot be wise or fair.

User: Heathrow Airport Consultative Committee (HACC)

Passenger Demand Forecast

2. The HACC accepts the DofT's revised passenger forecast in which demand is higher than previously expected and that this growth is concentrated in London and the South East. London Airports will therefore be further constrained and additional capacity will be required.

3. There is a view by some members that this additional demand should be constrained by the use of fiscal measures.

Monetised Benefits

4. The HACC notes that the monetised benefits from the higher levels of passenger demand are now more evenly balanced between Heathrow and Gatwick.

UK Airspace Policy

5. The HACC welcomes the Government's response to the consultation on UK Airspace Policy and in particular:

The call-in powers by the Secretary of State on airspace changes of national importance.

The new metrics to assess noise impacts and their effects on health.

The Independent Commission on Civil Aviation Noise (ICCAN).

Air Quality

6. The HACC has expressed concerns that there is a ‘high risk’ of a three runway Heathrow failing to be compliant with air quality targets between the time the new runway is expected to open in 2025 and 2029 – thereafter the risk falls to ‘medium’. Heathrow actions to mitigate this are limited as aircraft will continue to use fossil fuels for the foreseeable future. Improvements to air quality must therefore come from changing surface transport to hybrid/electric vehicles for those accessing the airport and those using the M4/M25 motorways. Furthermore, there must be greater use of public transport by airport users/employees. Government incentives will be needed to accelerate this change.

Noise

7. The HACC recognizes that all the schemes have the potential for significant negative noise impacts. It is estimated that around 93,000 more people will be affected by noise with a third runway in place compared to a two runway Heathrow – by 2030 some 650,000 will be affected. There should be some alleviation through the introduction of quieter aircraft and the HACC believes this move should be incentivised by Heathrow. It is likely that more annoyance could be caused by the increased number of aircraft using the airport, particularly to people who are newly under a flight path and the Government needs to assess this when coming to a final decision.

Surface Transport

8. The HACC notes that no further work on the costs of surface access has been carried out. This means the costs of creating sufficient road and rail schemes to serve either a second runway at Gatwick or a third runway at Heathrow remain uncertain and it is not clear who will provide the funding. The HACC believes both the costs and the funding must be clarified before any decision is taken on runway expansion.

Carbon Emissions

9. The HACC notes that the DofT estimates of the level of carbon emissions are lower than those given in the Airports Commission Report. This is driven by higher load factors on larger aircraft and a new generation of engines being introduced through the evolution of existing aircraft types. The DofT’s view is that all the possible schemes would meet the UK’s obligations under the Climate Change Act.

Heathrow Third Runway

10 The HACC notes that the DofT favour a third runway at Heathrow in terms of greater numbers of flights, earlier benefits to the economy, global hub status, surface access and freight volume.

11. Whilst some members of the HACC accept these views on the benefits which will accrue. Others, who represent those most affected, believe the negative outcomes in terms of noise, pollution, congestion and dislocation of communities make a third runway unacceptable.

Policy T9 Funding transport infrastructure through planning

User:	Mr Rob East

As you may be aware, people cannot afford to live in London and so have to live elsewhere. The exteremly high, and rising costs of commuting into and out of London are unsustainable. These travel costs are likely to result in many skilled workers deciding to work outside of the capital and so London could incur a loss of skilled labour. The GLA should be working with the necessary bodies to ensure that this does not happen by helping to create an affordable travel card (i.e. a 30% fare reduction) for London communters who earn less than say £40k. This card must apply to peak fares - off peak doesnt help when you have to be in work by 9.30am.

User:	Mrs Lynne Bailey

What happened to the Olympic Games levy, are we still paying it? If so can this not be used instead of charging us extra?

User: Montagu Evans

Policy T9 – Funding Transport Infrastructure Through Planning

Part C of this draft policy says that:

"Planning obligations (Section 106 agreements), including financial contributions, will be sought to mitigate impacts from development, which may be cumulative. Such obligations and contributions may include the provision of new and improved public transport services, capacity and infrastructure, the expansion of the London-wide cycle networks and supporting infrastructure, and making streets pleasant environments for walking and socialising, in line with the Healthy Streets Approach."

We make the following observations:

- ? some if not all of these matters should be addressed by CIL, the aim of which is to mitigate the impacts of development on infrastructure. Where CIL is in operation, seeking contributions in relation to the above is likely to amount to 'double dipping';
- ? whilst it is acknowledged that effects can be cumulative, it should be made clear that individual developments will only be required to make contributions that are proportionate to each individual development's impacts (or each development's share of a cumulative impact) and the Mayor should have a policy on pooled contributions to deal with cumulative impact mitigation; and
- ? individual developments should not be liable to provide section 106 contributions for schemes that are not needed solely to mitigate the impacts of an individual development, eg London-wide cycle networks, Crossrail line 2 and so on. These should be funded through CIL / Crossrail Levy or other similar means.

User:	London Forum of Amenity and Civic Societies

Policy T9 should have an additional section ‘Transport improvements should not be provided by permitting “enabling development” of a density that would be inappropriate for a site and its context.

The policy or a paragraph should make that clear.

User:	Watford Borough Council
Watford Borough Council supports the approach proposed by the Mayor in terms of funding infrastructure.	

User: Royal Borough of Kensington and Chelsea

10.14 Policy T9 Funding transport infrastructure through planning

The principle of funding transport infrastructure using Mayoral CIL is supported. However, this approach should only be used to fund strategic transport infrastructure that would have pan London benefits. In our view the only planned intervention that would benefit all parts of London is Crossrail 2. Mayoral CIL should be collected specifically to contribute towards the cost of Crossrail 2. If no agreement on Crossrail 2 funding is achieved, the imposition of Mayoral CIL does not appear warranted. The wording of Part A needs to be refined to provide more transparency and a greater level of detail. 34

The meaning of the term "strategically-important transport infrastructure" used in Part B of the policy is not explained and could give rise to debate as to what is strategically important. In our view anything that serves to deliver the Mayor's strategic approach to transport is of strategic value. It is recommended that the wording of B should be amended as follows:

"To realise the Mayor's strategic approach to transport, boroughs should, in consultation with the Mayor, identify a package of transport infrastructure, as well as improvements to the public realm, along with other funding streams to deliver them".

We support Part C.

User:	Biggin Hill Airport Limited

Whilst we recognise the value of the Mayors Community Infrastructure Levy (MCIL) to secure funding towards transport infrastructure of strategic importance, it seems to us unreasonable that we are required to pay MCIL on our own strategic infrastructure development at Biggin Hill Airport that goes towards other parties strategic infrastructure elsewhere in London.

We propose that where Biggin Hill and other strategic infrastructure assets are investing in transport infrastructure, creating growth and new employment, they should be excluded from the MCIL charge, as with Education and Health.

User: London Borough of Islington

Draft London Plan Policy

Policy T9 – Funding transport infrastructure through planning

Islington Response

We have significant concerns about the proposed office rates in the MCIL2 draft charging schedule. We have responded to this consultation separately.

User:	Association of Consultancy & Engineering

ACE supports the plan’s funding transport infrastructure through planning policy, including the proposal for the Mayoral Community Infrastructure Levy 2 (MCIL2). We believe reasonable Community infrastructure levies and planning obligations are essential to ensure strategic transport projects can be funded across London.

Lastly, ACE believes the Mayor should commit to ringfencing funding from planning obligations on specific infrastructure projects in the area where the revenue was collected.

User: Brentford Community Council

We are concerned that the improvements to transport infrastructure required to enable PTaLs to be improved to permit densification should not be financed by permitting “enabling development” at even higher densities

This process almost guarantees that such areas will be built to excessive densities, incompatible with a proper regard for context and heritage.

We request the Mayor to re-word Policy P9 to clearly state that transport improvements should not be provided by permitting “enabling development”.

User:	City of London Corporation

The City Corporation notes the Mayor’s intention to use MCIL to secure funding towards strategic transport infrastructure, such as Crossrail. The City Corporation has responded to the Mayor’s consultation on the MCIL2 Draft Charging Schedule and seeks a commitment from the Mayor to engage with boroughs and the City Corporation on MCIL spending priorities.

User: London Borough of Barnet

These policies seek to ensure provision of sufficient suitably located land for current and expanded public and active transport system. Safeguarding existing land and buildings used for transport or support functions It is necessary to recognise and give due consideration to existing physical constraints at a local level. The Brent Cross development proposals and Colindale CPO for over station development involve significant physical challenges. Golders Green also has potential issues regarding height and density of proposals.

Safeguarding route alignments 1) West London Orbital/ Dudding Hill Line The West London Orbital is included in the draft MTS as a possible route to be reopened and the DLP commits the Mayor, TfL and relevant London boroughs to involvement in a feasibility study for the scheme (MTS proposal 83, p. 209). Connecting a number of regeneration areas including Brent Cross, OPDC and the Great West Corridor, this line has the potential to unlock c20,000 new homes across the sub-region. We want this route to be reopened in order to support sustainable and convenient orbital movements and town centre growth and reduce demand on the North Circular. At present, options for a route to Cricklewood or northwards via Brent Cross are being tested for initial feasibility by the West London Alliance and commitment towards this scheme from the Mayor should be tightened with more detailed reference to West London Orbital provided in the final Plan. Barnet considers that the programme for the London Overground Extensions 2030-41 is not of sufficiently high priority and therefore request a commitment to earlier delivery of West London Orbital as a critical piece of infrastructure by the mid to late 2020s. 2) Crossrail2 The inclusion of New Southgate station in the draft MTS as a station on Crossrail 2 is positive for Barnet. Crossrail 2 can play a key role in unlocking further growth in eastern Barnet and support reduced car-dependency development within certain ward areas of Barnet. However, the draft MTS and Implementation Plan insufficiently clarify the phases by which branches such as New Southgate to Seven Sisters are to be delivered. While the Council recognises the need for effective and responsible financial management of Crossrail 2, it will be of great benefit to Barnet if the New Southgate extension is speedily delivered. At the very least, the final London Plan should give greater indication as to the phases and dates by which specific parts of Crossrail 2 are expected to be delivered. Safeguarding the Walk London network Barnet supports this initiative, particularly with regards to Outer London routes and the orbital path. Upgrades to Underground Lines More detail is required on what this will entail for lines within Barnet. However, the London Underground Station Capacity Programme (2017-40) is strongly supported with regards to the Piccadilly Line and Northern Line and the introduction of capacity upgrades as soon as these can be practicably brought forward. Barnet also welcomes the recent announcement on Step Free access for Burnt Oak. The programme should also include review of Step free Access for Mill Hill East/Colindale/Brent Cross/Arnos Grove via developer contributions and as part of the Stations Upgrade programme. Further details are required on proposals for the Night Tube. Indicative List of Transport Schemes It is noted that there is an intention to reallocate bus capacity from Central to Outer London and that bus network enhancements are also included as a medium priority within the DLP. The bus network will be crucial for Barnet in achieving mode share targets. Improvement of orbital routes is especially important, and while this is acknowledged in the DLP, further detail is needed on proposals to reallocate bus capacity and specific strategies required to address the challenge of orbital routes in Outer London. Barnet supports devolved suburban rail services to enable London suburban metro with regards to the Moorgate Branch through Oakleigh Park. We also strongly support devolution of the rail line to TfL to improve frequencies /services. The inclusion of Crossrail 2 (2020-2040) and Thameslink (2017-2020) with high priority status is welcomed. The Brent Cross Cricklewood development is Barnet’s most significant growth and regeneration programme and is underpinned by the construction of a new Thameslink railway station, delivered by the Council with Network Rail, which will provide a link to King’s Cross St Pancras in under 15 minutes. Barnet is seeking to bring forward the delivery of the new Thameslink Station and associated works within the

Brent Cross/ Cricklewood planning permission, to deliver the new station in 2022, as compared to 2031. To do so the applicant is proposing to establish two new Thameslink sub-phases within the existing planning permission. While we accept that electric vehicle usage is becoming more wide spread, we would like to see the provision for charging infrastructure implemented in line with demand in Barnet, not London as a whole. This is due to existing demands on kerb space within the Borough. Policy T4 specifies circumstances whereby financial contributions should be sought to address adverse transport impacts and direct provision of public transport, walking and cycling facilities. It also recognises that there may be circumstances where additional public transport and active travel infrastructure may need to be provided. This could include additional bus stops and on street improvements. We would welcome additional information in the London Plan on how this process is envisaged to operate under the current system and Development Management guidelines. This section mentions a wide range of assessments which need to be considered for future development impacts on the surrounding highway and its users. We are concerned that no assessment on the impact on parking stress has been made. This is a key issue for Barnet should the reduction in parking provision associated with this document be progressed. “Development proposals should not increase road danger.” This is welcomed; however, it would be beneficial for all highway users if this section of the policy is expanded to cover improvement of existing issues of road safety on the immediately surrounding highway.

User: London Borough of Barnet

Barnet supports Policy T9 that the Mayor will make use of Mayoral Community Infrastructure Levy (MCIL) resources to secure funding towards major strategic infrastructure. We welcome the policy commitment to require provision of improved infrastructure through planning for strategic borough infrastructure as well as TfL infrastructure and will work with the Mayor to identify suitable opportunities. However, this will have implications for workloads/resources. We would urge TfL and the GLA to engage with borough officers at an early stage in highlighting funding streams and future opportunity areas to ensure this level of funding is captured at the earliest stage possible and with a minimal loss in funding opportunity. For many years the “sub-regional boundaries” used by the GLA and TfL to plan their work have been inconsistent with the way that local authorities in West London actually work. Specifically, we consider that the Barnet should be considered by the GLA as a part of the “West” GLA sub-region. This small change would cost nothing to implement and is currently an active barrier to more effective and efficient joint working between boroughs with an established track record of doing so. The aspirations in the London Plan to increase sustainable travel to a mode share of 80% present significant challenges for Outer London. Radical rethinking is required on how people travel, especially in low density, low PTAL areas as well as those that have poor cycling and walking infrastructure. We believe that the Plan should have a commitment to do more on education, publicity and promotion of healthy travelling options in Outer London. A campaign along similar lines as those undertaken prior to the London Olympics (such as the Travel Advice to Business Programme) would provide substantial benefits in terms of informing the general public and local Members about the options available and the aims of the London Plan.

User:	Heathrow Airport Consultative Committee (HACC)

The HACC accepts the DofT's revised passenger forecast in which demand is higher than previously expected and that this growth is concentrated in London and the South East. London Airports will therefore be further constrained and additional capacity will be required.

3. There is a view by some members that this additional demand should be constrained by the use of fiscal measures.

Monetised Benefits

4. The HACC notes that the monetised benefits from the higher levels of passenger demand are now more evenly balanced between Heathrow and Gatwick.

8. The HACC notes that no further work on the costs of surface access has been carried out. This means the costs of creating sufficient road and rail schemes to serve either a second runway at Gatwick or a third runway at Heathrow remain uncertain and it is not clear who will provide the funding. The HACC believes both the costs and the funding must be clarified before any decision is taken on runway expansion.

User: WSP

We note the viability study which has been prepared alongside the Draft, and whilst we have not reviewed this in any great detail it does raise a number of questions and challenges which London must face if the level of growth is to be realised. The funding of major transport infrastructure such as those identified in Table 10.1 should be prioritised for delivery as this will assist in the pace and scale of delivery. As noted throughout our comments more certainty is required around the levels of funding available so that development can be shaped to reflect this.

We note that the Draft, as with the adopted Plan places equal weight to affordable housing and transport infrastructure. This is welcomed in principle but would benefit from further guidance on how and in what circumstances a prioritisation of one against the other will be made. At present the system means that there is often a lack of clarity and certainty until near the end of the process where funding should be prioritised with all parties seeking to secure the best outcome rather than working towards a clear set of objectives.

We note the Mayor will charge the Mayoral Community Infrastructure Levy (MCIL) to secure funding towards transport infrastructure of strategic importance such as Crossrail 2, and potentially other strategic transport infrastructure. We welcomes inclusion of Paragraph 10.9.3 which states that other transport infrastructure and improvements to public realm will be necessary to support London's growth. We would request that a reasonable balance is struck in seeking contributions where development contributes to such strategic benefits.

In conclusion we feel that some changes could be made to the overall emphasis of the Draft, and it could be made more punchy in terms of specific delivery and funding mechanisms. We also ask for greater flexibility where specific site constraints exist. Overall there is a lack of specific supplementary guidance which could really augment some of these policies and give clearer guidance to developers and councils.

User:	London Waste and Recycling Board (LWARB)

1. We support the inclusion of text to explain the potential benefits of the circular economy in paragraph 11.1.53. In relation to the definition of circular economy in this paragraph, we would refer back to our earlier points that this definition should be consistent within this document and across other Mayoral strategies.

User:	Better Bankside Business Improvement District

Additional information is, however, needed to outline how the transport initiatives within The London Plan will be funded. This is especially relevant following the removal of Transport for London's (TfL) funding grant from the central government and as bus and Tube patronage decreases. The indicative list of transport scheme outlined the cost per scheme, with over half of all schemes noted as 'medium' to 'high' costs.

User:	West End Partnership

Policy T9 identifies that the Mayoral Community Infrastructure 2 (MCIL2) will be introduced in April 2019 for Crossrail 2. However, there is no agreed funding package at present and should no funding deal be achievable *“the Mayor will apply the MCIL2 proceeds to fund other strategic transport projects which have a funding gap”*. Given that the West End will contribute a significant amount of MCIL2 funding (as it has done for MCIL1) and the success of the West End is integral to London’s position as a global city, MCIL2 should be used to fund the transport and public realm improvements that the Partnership has lobbied and sought funding for. The Partnership supports, as a matter of principle, that value created locally be invested locally.

User:	London Borough of Haringey

The Council supports this policy.

Haringey would note that Outer London Borough's do not currently directly benefit from Mayoral CIL, in terms of the improvements to public transport or other forms of sustainable transport infrastructure (improved cycle ways etc). The Council would support Mayoral efforts to bring Crossrail 2 to Haringey.

User:	London Borough of Barking & Dagenham

The Council broadly supports this policy although the Mayor’s Community Infrastructure Levy should not be restricted to just Crossrail 2 as this doesn’t benefit everyone in London. It is clearly iniquitous that a development in Barking will be funding Crossrail 2 which does not bring any benefits to Barking and Dagenham given that there is no commitment to an eastern spur to the borough. Due to viability the Mayor’s CIL is double the borough’s own CIL in these areas and takes vital funding away from the infrastructure needed to support the delivery of the 44,000 homes in London Riverside.

User: London Borough of Lewisham

We support T9 including the continued use of MCIL to fund strategic transport infrastructure and we acknowledge that both phase 1 and phase 2 of the BLE are of strategic importance to the capital, as outlined in the London Infrastructure Plan 2050, and the Mayors Transport Strategy (2017).

We stress that MCIL2 should be used to fund the BLE, as it is a strategically important London transport project that supports housing, employment and regeneration ambitions and will deliver Good Growth. It will also be necessary to explore alternative potential funding mechanisms for the BLE, including funding from Central Government, or other methods such as land value capture and upfront private investment.

User: London Borough of Brent

The Council supports this policy.

In particular, the Mayor should consider supporting funding for the following strategic transport infrastructure projects:

? The Elizabeth Line spur stopping at Wembley Central (subject to further assessment);

? The reinstatement of West Coast Main Line platforms at Willesden Junction (subject to further assessment); and

? The West London Orbital / Dudding Hill Line railway (subject to further assessment).

The Council does have some concerns for the proposed Mayor of London's Community Infrastructure Levy 2 Draft Charging Schedule (MCIL2 DCS) regarding the impact on housing and affordable housing delivery, local infrastructure, Opportunity Areas

and Housing Zones, community and employment/industrial land uses. These concerns are set out in more detail in the Council's formal response to the MCIL2 DCS (February 2018).

User:	London Borough of Bromley

Currently there is a second round of public consultation on proposals to increase the developer contribution through Mayoral CIL collection in Bromley to £60 from £35 per square metre to which (last summer) the Council has objected.

User:	London Councils

The policy states that Mayoral Community Infrastructure 2 (MCIL2) will be introduced in April 2019 to raise funds for CR2 – but if no agreement on CR2 funding is agreed then the funding is to be used for non-specified strategic transport projects. The Mayor needs to be open about what these alternative transport projects would in order to justify the implementation of MCIL2.

User: CBI

CBI members understand the importance of attracting more funding for London's future infrastructure projects. Businesses would welcome further opportunities to engage with the Mayor of London, Greater London Authority, and Transport for London to help ensure innovative and effective funding models are found.

Businesses commend the Mayor of London's recognition of London's strategic infrastructure needs as a means of accommodating the capital's projected population growth, unlock housing and increase employment. Members note the Mayor of London's ability to invest in major strategic transport schemes, such as Crossrail 2, are dependent on his negotiations with the Government. Businesses note the options for raising the required funding detailed in the draft London Plan, including Fiscal Devolution, Sharing in Land Value Uplift, and Business Rate Retention under Mayoral control.

Going forward, businesses remain willing to engage with the Mayor of London, and Transport for London to help ensure all options for London's future infrastructure needs are explored.

User:	London Borough of Tower Hamlets

The Council is supportive of the principle that contributions from MCIL2 can be spent on other strategic transport projects. The Council does not support the disproportionately high charge proposed to be applied to commercial development in the borough; the Council has submitted a representation in this regard to the consultation on the Mayor of London's new Preliminary Draft Charging Schedule.

Given that the level of London Mayoral CIL in Tower Hamlets is the highest within the entire of London, should the levels of development continue, it would not be unreasonable for there to be an Eastern spur to Crossrail 2 which would pass through the borough.

User: Environment Agency

We are aware that Transport for London are proposing to establish a biodiversity baseline on all of their assets. The purpose is to embed net gain into all of their projects (this will be monitored and recorded), and we welcome that approach.
Crossrail 2 are developing Green Infrastructure principles and adopting net gain, as are Network Rail, and Highways England. We are working collaboratively with TfL and Network Rail on Crossrail 2 to ensure that the environmental opportunities can be realised.

Recommendation:

Identify within the explanatory text that transport infrastructure schemes should deliver multiple benefits, such as the delivery and protection of green infrastructure, a net positive impact on biodiversity, and enable sustainable drainage. This would support policies in Chapters 3, 8 and 9, in addition to the objectives of the Mayor’s Transport and Environment strategies.

User:	Environment Agency
We welcome the inclusion, at policy point B, of a requirement for boroughs to identify improvements to the public realm and the necessary funding.	

User:	Royal Borough of Kingston
Support the reference to Crossrail 2, but seek clarity on the introduction of this crucial infrastructure investment.	

User:	London Borough of Hackney

The policy identifies that Mayoral Community Infrastructure 2 (MCIL2) will be introduced in April 2019 for Crossrail 2 – but if no agreement on Crossrail 2 funding is agreed then the funding is to be used for non-specified strategic transport projects. There should be greater transparency about what these alternative transport projects would be in order to justify the implementation of MCIL2. In the event that no funding deal is secured for Crossrail 2,
Hackney would want to ensure that the equivalent investment is made in other forms of public transport for the borough.

User:	London Borough of Merton

Object - ineffective. This policy states that the Mayors Community Infrastructure 2 (MCIL2) will be levied from April 2019, to support strategic infrastructure projects such as Crossrail 2. However, it is evident that any government decision on funding has been pushed back. The Mayor therefore needs to set out a prioritised list of alternative projects to justify the levy.

User:	Westminster City Council

We have commented earlier on the need to ensure effective and equitable approaches to funding transport infrastructure. All too often the Mayor’s approach appears to be to regard central London as a source of funding for infrastructure that is of no benefit to Westminster, its residents, businesses or visitors. The Mayor needs to be realistic about the extent of value development supports and clear in his views about priorities - the DRLP sets out a long list of priorities for use of planning gain and the list of items in criterion C merely adds to them. The relationship between this policy and draft policy DF1 should be clarified.

User:	London Borough of Redbridge

The Council supports this policy, particularly parts B and C, which will be necessary to help deliver the infrastructure needed to enact modal shift in outer London. However the scale of the change to the built environment needed in outer London to enable the ambitious modal shift envisaged to be met will require increased LIP funding as well, with planning gain being focussed in areas of high growth.

Transport infrastructure requires a significant financial commitment. Policy T9 needs to provide a greater level of detail. The policy identifies that Mayoral Community Infrastructure 2 (MCIL2) will be introduced in April 2019 for Crossrail 2, but if no agreement on Crossrail 2 funding is agreed then the funding is to be used for non-specified strategic transport projects. The Mayor needs to be open about what these alternative transport projects would in order to justify the implementation of MCIL2 particularly for Redbridge where we will not see direct benefits of Crossrail 2 or the Bakerloo Line Extension.

User:	London Borough of Wandsworth

Basically continuation of existing policy but should be better considered in light of the housing growth policies. The Council requests that further work is carried out on a detailed infrastructure plan if it is to realistically achieve growth targets. The Council is currently responding to the consultation of MCIL 2 and is raising a number of concerns about the proposed draft charging schedule. There are currently a range of demands made upon developments and a balance is required in terms of the priorities. Often demands for infrastructure provision or support can have a direct impact on the quantity and type of affordable housing that is provided.

User: Royal Borough of Greenwich

Chapter 10 Transport

The Boroughs have a critical role to play in developing and delivering local solutions and it is vital that this is recognised through improved Local Implementation Plan (LIP) funding allocations that recognise the magnitude of the challenge in Outer London. Moreover, the LIP funding arrangements should be amended to ensure that those Boroughs most committed to, and successful in achieving, Mayoral aims are not financially disadvantaged as is currently the case.

User: London Borough of Richmond Upon Thames

The Council is generally supportive of Policy T9. It is basically a continuation of existing policy, with a new emphasis on funding Crossrail 2 which is supported by this borough. However, we would suggest that it should be better considered in light of the housing growth policies. The Council requests that further work is carried out on a detailed infrastructure plan if it is to realistically achieve growth targets.

The Council does have concerns about the application of MCIL2 and comments have been made separately to the consultation on the draft Charging Schedule.

The Council continues to strongly object to the Mayor's proposals for MCIL2 as the evidence base presented by the Mayor does not meet Examination requirements. Mayoral CIL is not negotiable and has the potential to increase viability risk on some developments and cumulatively divert developer contributions away from local infrastructure provision, including affordable housing. It is therefore essential that the Mayor considers local variations in viability, rather than retaining his current broad brush approach and introducing differential charging without due consideration of site specific development viability on sites across London.

User:	London Borough of Havering

Paragraph 10.9.4

It is welcome that the Mayor will apply the proceeds from Mayoral Community Infrastructure Levy (MCIL2) to fund other strategic transport projects for which there is a significant funding gap.

Given the level of growth anticipated in outer east London over the lifetime of the London Plan the Mayor should consider Havering's key strategic transport aspirations as part of the MCIL funding regime.

User:	London Borough of Harrow

The Council supports this policy.

Harrow would note that Outer London Borough’s do not directly benefit Mayoral CIL, in terms of the improvements to public transport or other forms of sustainable transport infrastructure (improved cycle ways etc).

User:	The Wimbledon Society
T9: There should be support and funding for additional road bridges and pedestrianisation schemes, eg in Wimbledon Town Centre.	

User:	London Borough of Enfield
Policy T9 focuses on ‘Funding Transport and Infrastructure through Planning’. There is concern over the uncertainty of Crossrail 2.	

User: Berkeley Group

11.12. The Community Infrastructure Levy has been established to pool funding from developments to contribute to transport and other infrastructure. The Mayoral CIL contributes to Crossrail, and in the future, Crossrail 2. The assumption should be that other transport will be paid for through borough CIL, other than in exceptional circumstances. The draft London Plan places considerable cost burdens on development, including the threshold approach to affordable housing. Policy T9 should be amended:

Policy T9 Funding transport infrastructure through planning
B Planning obligations (Section 106 agreements), including financial contributions, will be sought to mitigate (strikethrough) The Mayor will work with boroughs to use the Community Infrastructure Levy to mitigate the impacts from development, which may be cumulative. Such obligations and contributions(strikethrough) This may include the provision of new and improved public transport services, capacity and infrastructure, the expansion of the London-wide cycle networks and supporting infrastructure, and making streets pleasant environments for walking and socialising, in line with the Healthy Streets Approach. In exceptional circumstances, taking into account the other benefits being delivered, planning obligations (Section 106 agreements), including financial contributions, may be additionally sought to mitigate development impacts.

User:	London Borough of Hounslow

LB Hounslow has contributed significantly to the delivery of Crossrail through the introduction of MCIL at £35 per square meter. In addition, Hounslow adopted a CIL charging schedule in 2015, and collects planning obligations where appropriate. The introduction of the MCIL draft charging schedule for Crossrail 2 (MCIL2), where Hounslow has been placed in the Band 2 category, requiring a contribution of £60 per square meter. This proposed new price a significant increase on the current rate and could negatively impact the Borough's CIL charging viability. The Borough will be submitting a full response to the current consultation of MCIL2.

LB Hounslow will, at present, receive little benefit to accessibility from either Crossrail or Crossrail 2, yet contributes heavily in the form of MCIL, and the Council would like to see the GLA support connections to Crossrail stations for boroughs such as Hounslow. As the commencement of Crossrail 2 is not guaranteed there should be reference to the process of funding redistribution in the event the Crossrail 2 scheme is postponed. Policy T9, point C should make mention of traffic congestion mitigation and road safety measures.

User:	Motorcycle Action Group

MAG asserts that It is wrong to positively discriminate in favour of cycling at the cost of other, more practical modes of transport. The Plan must be very cautious to enable a credible modal mix, without any risk of prejudicial support for one particular mode without a strong, data-based justification.
MAG has provided an absolute robust case for the support of PTWs but we see no recognition of this in the plan.
MAG urges the Plan to include consideration for funding infrastructure funding for PTW's through planning

User: TUC London, South East and East of England

Policy T9: Funding transport infrastructure through planning

1. Where publicly funded transport infrastructure projects produce a windfall gain for private sector owners of property, premises or land, the planning system should work to tax that windfall gain, or seek proportionate contributions from the private sector to the initial investment costs. The Mayoral Community Infrastructure Levy is a positive step, though possibly not a sufficient one.

User: Just Space

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

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

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

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

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

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

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

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

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

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

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

User: Heart of London Business Alliance

It is recognised that particular mechanisms for funding major infrastructure projects will often be controversial, through we agree that business should play its part in line with Policy T9: Funding Infrastructure through planning. Businesses across London are likely to be expected to pay increased sums through these routes over the period of the Plan. It is essential, therefore, that the details of the use to which the funds will be applied, the time periods for the payments and the overall budgets for the relevant projects are all fully transparent. The Policy should include an obligation on the Mayor to provide this information in a timely way.

Given the long time period of the Plan, this Policy cannot be separated from new sources of funding envisaged by the Mayor and being sought from central government. These include devolution of certain taxation powers, as recommended by the London Finance Commission and the exploration of new sources of finance from sharing in land value uplift. Both these approaches are described in paras. 11.1.58 – 11.1.65, but could also usefully be included in this Policy.

User:	London Borough of Bexley

The Council supports the reference in Part A of Policy T9 Funding transport infrastructure through planning for the funding of other strategically-important transport infrastructure from MCIL2 (*Mayor Community Infrastructure Levy*) and would suggest that the extension of Crossrail to Ebbsfleet and DLR extension to Belvedere, which have significant funding gaps, would make suitable schemes for this funding.

User: LEVC

Policy T9 Funding transport infrastructure through planning

- Where possible, LEVC would encourage the Mayor to exercise powers to deploy a 50kW+ rapid charging network which is strategic and planned for current vehicle demand and future uptake of electric taxis and commercial vehicles.
- He should also specifically charge the Mayoral Community Infrastructure Levy (MCIL) to secure funding towards 50kW+ rapid electric vehicle charging infrastructure.
- Boroughs in conjunction with the Mayor and Transport for London should be obliged to provide a pathway to installing 50kW+ rapid electric vehicle charging infrastructure along highways, in car parks, and in other suitable locations.
- Boroughs in conjunction with the Mayor and Transport for London should also be obliged to provide a pathway to installing 7kW+ fast electric vehicle charging infrastructure for residents who do not have access to off-street parking, including drivers of taxis and vans, to charge their vehicles overnight.

User:	Federation of Small Businesses
There should be fair thresholds to exempt the smallest businesses from paying a supplementary charge.	

User:	Federation of Small Businesses

The Mayor should continue the policy in the previous London Plan of restricting affordable housing contributions on small sites and help ensure that boroughs do not attempt to adjust their CIL charges to undermine the effects of this policy.

User: West London Alliance

We support policy T9 that the Mayor will make use of Mayoral Community Infrastructure Levy (MCIL) resources to secure funding towards major strategic infrastructure. In line with policy T9 WLA boroughs have jointly developed shared strategic infrastructure priorities, particularly the “West London Orbital” line that is included in the draft London Plan (p.47) and the Mayor’s Transport Strategy.

The line runs from West Hampstead and Hendon at one end and Hounslow at the other, and would connect the major regeneration areas of Brent Cross, Wembley, and Park Royal whilst supporting the unlocking of significant potential new housing intensification and regeneration opportunities around Neasden, the Golden Mile and potentially also Staples Corner. It would allow for housing intensification in places like Gladstone Park. The line would provide orbital travellers, who are currently required to make orbital journeys using the heavily congested and polluted the A406 North Circular Road, with a significantly faster and more convenient alternative that improves their transport experience. This scheme makes use of existing underused twin-track freight lines and passenger lines along its entire length.

West London boroughs have jointly commissioned a feasibility study with the support of TfL into the operation of the line. The key points can be summarised as:

- The scheme is technically feasible including in relation to Acton Wells Junction and Bollo Lane level crossings, although further detailed work is now needed through the formal GRIP stages.
- Forecasts derived from TfL’s modelling suite indicate significant levels of passenger demand for the scheme and benefits for passengers across the public transport network.
- BCR of 2.2:1 according to DfT methodology.
- Analysis by boroughs has identified potential to unlock approximately 22,000 new homes along the length of the line, including in the vicinity of a number of new stations. This would yield in the region of £200m of Community Infrastructure Levy.
- With WLO there will be significant time savings for public transport users and a competitive alternative to car use. The level of competitiveness would depend on when the car journey is being made, e.g. peak periods or off-peak.
- Stronger integration of the OPDC area the communities that surround it, helping to weave it into the wider London economy. The West London Orbital Line would allow orbital travellers to change to Crossrail and HS2 lines without needing to first travel in to London.
- Strong strategic fit with the priorities set out in both the draft MTS and emerging London Plan including 1) improving the transport experience, 2) New homes and new jobs, and 3) Healthy streets and healthy people. The Scheme is also consistent with the Mayors focus on “Good Growth” as set out in the emerging London plan.

- The scheme makes better use of under-utilised orbital freight lines, sweating assets and maximising value from London's existing transport infrastructure and minimising any disruption to residents and businesses associated with major new schemes.

In addition, the West London Economic Prosperity Board (WLEPB), a formally constituted cross-party committee consisting of the leaders of six West London boroughs has made this scheme a standing item on its agenda and have given it formal cross-party political support. Through the Committee the West London boroughs have also agreed to incorporate the scheme it their Local Plans so that it now forms part of their integrated long-term strategic planning in the future, as suggested by the Deputy Mayor for Transport.

As well as its technical deliverability, housing supply/regeneration benefits and good strategic fit the line has the potential to offer London an opportunity to test innovative new approaches to suburban-metro rail such as making use of Battery-powered rolling stock rather than polluting diesel units. It supports the principle of "good growth" by making better use of what are currently notably under-used freight lines that happen to connect some of the most significant housing and employment growth areas in London including Brent Cross, Wembley, Park Royal, and the Golden Mile in Hounslow, significantly reducing journey times between these areas as shown in figure 2 below.

We note that suburban metropolitan rail schemes such as this will become increasingly essential in the years ahead if the Mayor is to meet the target of 80% of all journeys being by foot, bike or public transport by 2041, against the context of the population approaching 10m by the 2040s and the majority of population growth expected to occur in precisely the sorts of outer-London areas that the West London orbital connects. Schemes with strong cross-party support such as this are also more likely to prove successful.

Analysis by borough planning departments of the land that the line would passes through has identified capacity for approximately 22,000 new housing units and approximately £200m of CIL. We believe that, given the positive feasibility case, high value-for-money case, passenger demand numbers and strategic fit of the line there will be viable options for securing additional funding from a range of sources including government and the private sector.

Further, more detailed GRIP stages are now needed to explore the detailed specification of the line, and well as to develop a more focused funding package for its construction and subsequent operation building on the analysis described above.

KEY ASK 6: We invite the Mayor, through TfL, to make this scheme a part of the story of transport in London through the London Plan, as well as the Mayor's Transport Strategy, and to continue to work with West London boroughs to bring this line to completion by the 2020's.

The London Plan contains overly constraining policies relating to parking space. West London boroughs recognise the challenges associated with parking, however we consider that the best way to meet this challenge is to allow boroughs to tailor their local approaches and policies in relation to parking to the local circumstances and conditions, which they are best placed to do.

KEY ASK 7: We ask that the Mayor recognise that boroughs are best placed to develop and implement parking strategies that reflect local circumstances, and that boroughs are enabled through the final London Plan to take more tailored and locally appropriate approached to parking.

User: British Property Federation

We are pleased to see the Mayor championing further infrastructure development in London, including through Crossrail 2, in the new draft plan. We have publicly urged the UK Government to get behind Crossrail 2 and fully support the Mayor in his attempts to push this vital scheme forward.

However, we note that this section of the plan sets out that, if Crossrail 2 does not go ahead, monies collected from the MCIL2 will be used for other strategic infrastructure projects. Whilst we fully support the Mayor in his efforts to secure central government funding for Crossrail 2, in the meantime, we urge the Mayor to list the other forms of infrastructure options for the capital. We would also argue that the charging rates for MCIL 2 should be looked at again should the Mayor fail to secure the funding from UK Government.

User:	Uttlesford District Council

It is important that references to the use of the Mayoral Community Infrastructure Levy in Policy T9 (Funding transport infrastructure through planning) in the draft London Plan are strengthened. Clause ‘A’ of Policy T9 suggests that this will ‘potentially’ be used to secure funding to other strategic transport infrastructure (i.e.: other than Crossrail 2). Uttlesford District Council suggests that the word ‘potentially’ is removed from this clause, thus given a far stronger commitment to investment and delivery.

User:	Crest Nicholson PLC

We consider this Policy to be unsound as currently drafted and amendments are required.

Crest Nicholson are concerned that reference to MCIL2 in Part A prejudges the outcome of the consultation and independent testing of the proposals for MCIL2. We consider this Part of the policy to be unsound and inappropriate for this reason and suggest that it is deleted or amended to recognise that MCIL2 has not been tested and is not in force.

User: Royal London

Policy T9 – Funding transport infrastructure through planning

RL are supportive of the delivery of Crossrail 2 as a strategically important infrastructure for London. However, it must be recognised in setting any MCIL2 rate that the viability of development should not be undermined and no contribution should certainly be required up until a point where there is certainty regarding the delivery of the infrastructure. The supporting text to the policy identified that in the event of Crossrail 2 not coming forward funding will be allocated to other strategic infrastructure where there is a significant funding gap. This is a wholly unacceptable approach with their needing to be confidence and clarity of the relationship between the development and the infrastructure provided.

Additionally, we note that the consulted charging levels for MCIL 2 represent a significant increase on existing MCIL 1 and Crossrail Planning Obligations costs (regardless of indexation). Again, this represents another additional cost and burden for development at a time of increased risk in the property sector and should be revisited.

User:	Living Streets

We support policy T9. We support a significant programme of reallocation of road space away from motorised vehicles to walking and cycling. Significant investment will be required to achieve this and we support the commitment to explore land value capture mechanisms.

User: London Property Alliance

The Alliance is keen to ensure that adequate transport infrastructure is provided to support new development and recognises the role that new development has in funding this. The Alliance is supportive of Crossrail 2 and is keen to ensure that MCIL2 is used to bring forwards the development of this vital project.

Nevertheless, we are concerned at the range of other potential transport projects that Policy T9(C) could require development to contribute towards, in addition to local and London-wide CIL charges, affordable housing and the other requirements of the Plan. This policy provides little certainty to developers on the potential extent of planning contributions and is of some concern, especially given the potential cumulative impact and the lack of convincing viability evidence. The capacity of development to contribute to new infrastructure and other planning objectives is not unlimited.

The focus of the policy should be upon the use of CIL, which is raised to fund the infrastructure required, with planning obligations to secure financial contributions used only in exceptional circumstances.

Conclusion

The Alliance share the Mayor’s desire to encourage cycling, and to provide adequate cycle parking which is fit for purpose, secure and well-located. However, there is concern that the increase in cycle parking requirements will prove overly onerous and difficult to achieve, particularly on smaller development schemes, or those that envisage refurbishment and extension, rather than comprehensive redevelopment. This should be acknowledged in the policy, with flexibility allowed for such schemes.

The Alliance is concerned that the proposed approach to short-stay cycle parking is not always appropriate for the CAZ. It is very important therefore that the short stay cycle parking standards are applied flexibly, with site specific circumstances dictating whether they can be applied in each and every case.

The Alliance supports a more moderate approach to parking for residential schemes within the CAZ, which would give local authorities the flexibility to allow some limited provision of car parking where this is appropriate at the local level.

User:	Silvertown Homes
Part C of Policy T9 should explicitly acknowledge that any financial obligations secured must be necessary to make the development acceptable in planning terms; directly related to the development; and fair and reasonably related to the scale and kind of the development, in accordance with the NPPF tests.	

User:	London Travel Watch

This policy promotes the use of the Mayor’s powers to levy a community infrastructure levy and require the funding of mitigation measures associated with the travel demand of new development. This is supported.

User:	Barratt Developments plc
Part C of Policy T9 should explicitly acknowledge that any financial obligations secured must be necessary to make the development acceptable in planning terms; directly related to the development; and fair and reasonably related to the scale and kind of the development, in accordance with the NPPF tests.	

User:	London Borough of Sutton

SUPPORT WITH CONDITIONS. The policy identifies that Mayoral Community Infrastructure 2 (MCIL2) will be introduced in April 2019 for Crossrail 2 – but if no agreement on Crossrail 2 funding is agreed then the funding is to be used for non-specified strategic transport projects. The Mayor should be clear about what these alternative projects would be in order to justify the implementation of MCIL2. The council considers the Tramlink extension to Sutton would be a most suitable candidate in this eventuality.

User: Old Oak Park Limited

Part A indicates that the Mayor will charge the Mayoral Community Infrastructure Levy (MCIL) to secure funding towards transport infrastructure of strategic importance such as Crossrail 2, ‘and potentially other strategic transport infrastructure’. Part B then goes on to encourage boroughs to identify a package of other strategically-important transport infrastructure, in consultation with the Mayor, including other funding streams to deliver them.

We welcome the intention of this policy, and the acknowledgement at paragraph 10.9.3 that there are other transport infrastructure and improvements to the public realm besides Crossrail 1 and 2 that will be necessary to support London’s growth. However, we do not consider that the intention of this policy and its supporting text is currently being reflected in the MCIL charging schedule, or the draft MCIL2 charging schedule which is due to come into effect in April 2019. The Old Oak OA is one example where significant investment in infrastructure is required in order to deliver the ambitious targets for new homes and jobs identified by the Draft London Plan. Alternative funding sources are being explored, but if the Plan genuinely hopes to achieve delivery of scale in OAs, such as Old Oak, it must consider the impact of MCIL on these development sites, and ensure that development there can fund delivery of the necessary infrastructure alongside other strategic priorities.

As such, rather than recommend a change to the policy, we simply encourage effective implementation of its content, and as a result encourage greater flexibility in the use of MCIL and MCIL2 to fund strategic infrastructure other than Crossrail 1 and 2.

User:	Chartered Institute of Logistics & Transport

While the use of the Mayoral Community Infrastructure Levy and Planning obligations can be used to fund transport infrastructure, this Policy should include reference to new funding streams, for example from road pricing. This is obliquely referred to in paragraph 10.9.5, but there should be a specific reference to road pricing, which CILT supports. More details are set out in Chapter 11 on Funding the London Plan (paragraphs 11.1.26 to 11.1.33), but there should be policies as well as explanatory text.

User: London Borough of Newham

Policy T9 Funding Transport Infrastructure through planning

LBN are conditionally supportive of the policy. Whilst it is recognised that the Mayoral CIL (MCIL) will secure funding for potential Crossrail 2, LBN consider the policy should be clearer on it commitments for ‘other transport infrastructure’ as part of the policy and reflect projects set out in the Draft Mayors Transport Strategy (implementation Plan). LBN would wish to reiterate that the Draft revised Local Plan reflects on the LBN’s Infrastructure Delivery Plan to support growth, and this is particularly important to reflect significant growth ambitions in areas such as Royal Docks and Beckton.

User:	Blackheath Society

Policy T9 Funding transport infrastructure through planning: We agree that Section 106 agreements have a large role to play. This should be not merely to ‘mitigate impacts from development’ but to finance wider community (such as cultural) benefits. Importantly, councils should be required to put in place transparent processes whereby their use of Section 106 funds is explained and transparent to residents.

User:	Peabody

In the midst of London’s housing crisis, we believe that all planning obligations should include affordable housing provision.

Where financial contributions such as Mayoral Community Infrastructure Levy are charged, we strongly believe that these should be used towards essential strategic infrastructure. In the same way as MCIL was used towards the Elizabeth Line, we believe policy should specifically refer to the DLR Extension, recognising that this is a top priority at the same level as the Crossrail.

User:	London Borough of Ealing

Funding Transport Infrastructure Through Planning (T9)

The Council supports this policy and, in particular, welcomes efforts to find new and effective ways of funding transport infrastructure.

User: London Chamber of Commerce and Industry

Policy T9 Funding transport infrastructure through planning

116. The Mayor's vision for transport in the capital is ambitious in scale – and needs to be. By 2041, London's public transport system will need to cater for up to 15 million trips every day.

117. Financing the projects that the capital needs remains a hurdle – with Crossrail 2 being only the latest example. Without a doubt, London can meet the transport and infrastructure challenges it faces, but only if empowered to do so. LCCI supports a

bold strategy of fiscal devolution for London, one that would maximise local growth incentives and support transport infrastructure.

118. In March last year, a Memorandum of Understanding (MoU) on the next stage of devolution to the Greater London Authority (GLA) and London boroughs was published which contains a series of commitments by government, including to pilot a Development Rights Auction Model (DRAM) on a major infrastructure project in London. The MoU is positive, and consistent with the principles and ideas set out in the final report of the London Finance Commission which contained a series of practical steps to deliver fiscal devolution to the capital.

119. LCCI is supportive of proposals to pilot a Development Rights Auction Model (DRAM) on a major transport infrastructure project in London.

120. Moreover, it must only be a start. As highlighted by the most recent report of the London Finance Commission, having access to a range of revenues (matched by a reduction in central government grant) would enable London to focus on those schemes that are likely to deliver growth and fiscal revenues. These revenues could include a percentage of Londoners' income tax yield – broadly to match its overall expenditure, as and when further devolution occurs - a proportion of London businesses' VAT yield and the full suite of property taxes (including the operation and setting of council tax and business rates and the devolution of stamp duty).

121. Crossrail 2 is perfect example of why a better way of funding local projects is needed, as it would help to guard against the unhelpful narrative that has developed in some quarters that characterises infrastructure spend as a 'zero-sum' game of London versus other regions and cities across the country. Ensuring a broad base of different revenues is devolved, from different sources, is also essential to preventing businesses being used as a 'cash cow' through an overreliance on (largely business related) fiscal levers already available to local government, e.g. business rates supplements and other levies.

User: Sustrans

We welcome the approach set out in Policy T9.
A - We consider that cycling infrastructure is of strategic importance to warrant MCIL funding income. Achieving the Mayor's Transport Strategy and unlocking some the major potential identified by TfL will require significant investment in streets. We cannot see a way of increasing the rate of delivery without increasing funding for cycling. While there is a significant amount of new infrastructure to celebrate, we estimate that it accounts for less than 1 percent of London's street network by length. For example, we now have 31 kilometres of segregated cycle lane for a population of approximately 8 million people. Denmark's capital, Copenhagen, has a network of 370 kilometres of segregated cycle lane serving a quarter of London's population – it has some of the highest cycling rates of any city in the world. There is a long way to go in improving London's infrastructure.
B – support
C – We strongly support the instruction to consider planning obligations for the funding of the London-wide cycle networks, in line with the Healthy Streets Approach.
While we welcome the commitment to explore land value capture mechanisms in chapter 11 (11.1.13), we believe such mechanism should play a critical role in funding transport infrastructure improvements. It is well understood that land value increases with improved transport infrastructure, particularly, connections to employment centres.[9]

D The Mayor will work with Transport for London, Government and other stakeholders to develop a effective, efficient and fair approach to Land Value Capture to help fund strategic transport infrastructure and address the funding gap.

[9] Transport for London (2017) Land Value Capture https://www.london.gov.uk/sites/default/files/land_value_capture_report_transport_for_london.pdf

User: South West London and St George's Mental Health NHS Trust

Part C of this draft policy says that:

“Planning obligations (Section 106 agreements), including financial contributions, will be sought to mitigate impacts from development, which may be cumulative. Such obligations and contributions may include the provision of new and improved public transport services, capacity and infrastructure, the expansion of the London-wide cycle networks and supporting infrastructure, and making streets pleasant environments for walking and socialising, in line with the Healthy Streets Approach.”

We make the following observations:
? some if not all of these matters should be addressed by CIL, the aim of which is to mitigate the impacts of development on infrastructure. Where CIL is in operation, seeking contributions in relation to the above is likely to amount to ‘double dipping’;
? whilst it is acknowledged that effects can be cumulative, it should be made clear that individual developments will only be required to make contributions that are proportionate to each individual development’s impacts (or share of a cumulative impact) and the Mayor should have a policy on pooled contributions to deal with cumulative impact mitigation; and
? individual developments should not be liable to provide Section 106 contributions for schemes that are not needed solely to mitigate the impacts of an individual development, for example London-wide cycle networks, Crossrail line 2 and so on. These should be funded through CIL / Crossrail Levy or other similar means.

User:	Hornsey & Wood Green Labour Party

Property owners benefit hugely from public transport development to such an extent that in some places they could finance the full cost and still come out with a profit. More robust mechanisms need to be put in place to extract this money.

User:	Redrow Homes London Division.
Part C of Policy T9 should explicitly acknowledge that any financial obligations secured must be necessary to make the development acceptable in planning terms; directly related to the development; and fair and reasonably related to the scale and kind of the development, in accordance with the NPPF tests.	

User: Kent County Council

KCC supports Part A of Policy T9, which refers to charging the Mayoral Community Infrastructure Levy (MCIL) to secure funding towards transport infrastructure of strategic importance. Funding for schemes such as Crossrail 2 and other strategic transport infrastructure is imperative to ensuring their timely delivery and a transport network that meets the needs of current and future users.

Further devolution to yourself, the GLA and TfL will enable road user charging to be implemented in London as well as schemes such as a workplace parking levy. The implementation of such schemes should be carefully considered to ensure that they do not unfairly disadvantage some road users and exacerbate inequality. This must also consider cross-boundary issues between the outer London boroughs and adjoining local authorities.

Funding mechanisms should be discussed in detail with the London Boroughs who will be required to implement many of the policies and proposals.

User: Cross River Partnership

It is recognised that particular mechanisms for funding major infrastructure projects will often be controversial. Businesses across London are likely to be expected to pay increased sums through these routes over the period of the Plan. It is essential, therefore, that the details of the use to which the funds will be applied, the time periods for the payments and the overall budgets for the relevant projects are all fully transparent. The Policy should include an obligation on the Mayor to provide this information in a timely way.

Given the long time period of the Plan, this Policy cannot be separated from new sources of funding envisaged by the Mayor and being sought from central government. These include devolution of certain taxation powers, as recommended by the London Finance Commission, and the exploration of new sources of finance from sharing in land value uplift. Both these approaches are described in paras 11.1.58 – 11.1.65, but could also usefully be included in this Policy.

User:	Oneill Homer
T9 Neighbourhood plans can identify priorities for local CIL/S106 spend on transport and other infrastructure.	

User:	L&Q

Funding transport infrastructure

Part C of Policy T9 should explicitly acknowledge that any financial obligations secured must be necessary to make the development acceptable in planning terms; directly related to the development; and fair and reasonably related to the scale and kind of the development, in accordance with the NPPF tests.

User: dp9

Policy T9 – Funding transport infrastructure through planning

We would encourage recognition in this policy that many large-scale, long-term major regeneration schemes such as Battersea Power Station are already committed to funding strategic transport infrastructure projects, and cannot take the additional burden of MCIL2 on top of these commitments. If the Draft London Plan and the MCIL2 Draft Charging Schedule, also out for consultation, do maintain this stance and fail to acknowledge these pre-existing funding arrangements, then the only potential source of flexibility for these developments in order to continue delivery is their affordable housing contribution. Development cannot provide more of everything, and unless there is a willingness to acknowledge the different capabilities of each scheme to deliver different strategic objectives, our concern is that none of the objectives will be achieved and development will slow or stop.

RECOMMENDATION: Introduce an acknowledgement that the requirement for infrastructure funding will be given due weight in the viability of development schemes, and especially for largescale long-term regeneration schemes where the infrastructure costs are significant.

User: Taylor Wimpey UK

Policy T9 Funding trans port infrastructure through planning

Part C states that Section 106 agreements including financial contributions will be sought to mitigate impacts from development, and may include the provision of new and improved public transport services, capacity and infrastructure,the expansion of the London-wide cycle networks and supporting infrastruct ure.

S106 contributions would be in addition to the MCIL plus the Local Planning Authority's CIL.

We are concerned that the cumulative burden of these charges together with the anticipated increase in deve lopment costs associated with the proposed policies e.g. (enhanced design, increased use of carbon reduction and energy efficient technolog ies, maximising the density of development, increased requirements for open space provision, incorporating green infrastructure within design and agent of change approach together with the Mayors affordable housing requirement will impact on the viability of housing and mixed use schemes.

We remind the Mayor that Authorities must strike an appropriate balance between the desirability of funding infrastructure from the levy and the potential impact upon the economic viability of development across their area including the provision of affordable homes.

Furthermore, Para 173 of NPPF states "Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened."

Whilst not a matter for the London Plan, we also raise concern over the restriction placed on Council's ability to pool more than 5 obligations to fund a particular piece of infrastructure. This represents a significant constraint to the delivery of housing developments that commonly rely on improvements to off- site infrastructure such as highway projects, open space, and secondary education to support the proposals.

User:	Aitch Group

The London Plan must provide more confidence to applicants where development relies on infrastructure capacity – We support the draft London Plan's objective to use infrastructural improvements (e.g. DLR extension) to support the delivery of new development (especially homes). However, the draft London Plan must provide more confidence to applicants to pursue schemes where funding for such infrastructural improvements is not guaranteed.

User: London Borough of Camden

Camden supports the principle of an Mayoral CIL 2 as part of a package of measures to fund Crossrail 2, a project which has the potential to bring much economic benefit to Camden and London as a whole. However, it is not clear whether the need to fund other necessary public transport improvements (such as station improvements in Kentish Town and West Hampstead) have been factored into infrastructure budgeting and the setting of MCIL 2.

These wider public transport improvements may need to be funded through planning obligations and an increased MCIL2 may interfere with this unless funding is found for these improvements from other sources. Reduced transport funding to service these areas could limit their growth potential and the provision of housing and affordable housing.

Criterion A of Policy T9 states that Mayoral CIL could potentially be used to fund “other strategic transport infrastructure” as well as or instead of Crossrail 2. Camden would want to be consulted on the use of any MCIL generated in the borough which is not intended to be used on Crossrail 2 and would be concerned if any MCIL raised in the borough were to be spent on infrastructure that was not of benefit to Camden.

User: Battersea Project Land Company Limited

Policy T9 – Funding transport infrastructure through planning

We would encourage recognition in this policy that many large-scale, long-term major regeneration schemes such as Battersea Power Station are already committed to funding strategic transport infrastructure projects, and cannot take the additional burden of MCIL2 on top of these commitments. If the Draft London Plan and the MCIL2 Draft Charging Schedule, also out for consultation, do maintain this stance and fail to acknowledge these pre-existing funding arrangements, then the only potential source of flexibility for these developments in order to continue delivery is their affordable housing contribution. Development cannot provide more of everything, and unless there is a willingness to acknowledge the different capabilities of each scheme to deliver different strategic objectives, our concern is that none of the objectives will be achieved and development will slow or stop.

RECOMMENDATION: Introduce an acknowledgement that the requirement for infrastructure funding will be given due weight in the viability of development schemes, and especially for largescale long-term regeneration schemes where the infrastructure costs are significant.

User: Barts Health NHS Trust

Policy T9 – Funding Transport Infrastructure Through Planning

Part C of this draft policy says that:

“Planning obligations (Section 106 agreements), including financial contributions, will be sought to mitigate impacts from development, which may be cumulative. Such obligations and contributions may include the provision of new and improved public transport services, capacity and infrastructure, the expansion of the London-wide cycle networks and supporting infrastructure, and making streets pleasant environments for walking and socialising, in line with the Healthy Streets Approach.”

We make the following observations:

? some if not all of these matters should be addressed by CIL, the aim of which is to mitigate the impacts of development on infrastructure. Where CIL is in operation, seeking contributions in relation to the above is likely to amount to ‘double dipping’;

? whilst it is acknowledged that effects can be cumulative, it should be made clear that individual developments will only be required to make contributions that are proportionate to each individual development’s impacts (or share of a cumulative impact) and the Mayor should have a policy on pooled contributions to deal with cumulative impact mitigation; and

? individual developments should not be liable to provide section 106 contributions for schemes that are not needed solely to mitigate the impacts of an individual development, eg London-wide cycle networks, Crossrail line 2 and so on. These should be funded through CIL / Crossrail Levy or other similar means.

User: Tavistock and Portman NHS Foundation Trust

Policy T9 – Funding Transport Infrastructure Through Planning

Part C of this draft policy says that:

“Planning obligations (Section 106 agreements), including financial contributions, will be sought to mitigate impacts from development, which may be cumulative. Such obligations and contributions may include the provision of new and improved public transport services, capacity and infrastructure, the expansion of the London-wide cycle networks and supporting infrastructure, and making streets pleasant environments for walking and socialising, in line with the Healthy Streets Approach.”

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? individual developments should not be liable to provide section 106 contributions for schemes that are not needed solely to mitigate the impacts of an individual development, eg London-wide cycle networks, Crossrail line 2 and so on. These should be funded through CIL / Crossrail Levy or other similar means.

User:	Network Rail
Policy T9, page 436 – The wording of the policy should be amended to include Network Rail in the process of ‘identifying a package if their strategically-important transport infrastructure’, as Network Rail possess vital information and data that will help inform this process.	

User:	Crest Nicholson PLC
h) Policy T9- additional infrastructure levies will impact on scheme viability	

Policy T6.1 Residential parking

User:	Sustrans
We support the approach to residential car parking set out in Policy T6.1.	

User:	Sustrans
We welcome the standards' more nuanced approach to car parking, particularly one that recognises the need for stricter parking standards where public transport, town centres and the central activities zone are more accessible as well as the need to design in sustainable travel in Opportunity Areas. We are concerned that the proposed residential car parking maxima for Outer London PTAL 2, O – 1 are above the current average levels of car ownership in these areas and would, therefore, enable an increase in ownership and use against the background existing rates of ownership. PTAL 0 – 2: up to 1 space per unit	

User:	Hornsey & Wood Green Labour Party

The standards for Outer London seem unnecessarily generous. It would be difficult to reconcile these standards with the aim to make 80% of journeys by non-powered means. The priority in areas with low PTAL standards should be to raise the standard rather than to allow more parking.

User:	Mr Sydney Charles

G. To ensure that there is space for disabled people, and people who need personal transport for other reasons eg work materials, young children who cannot use car shares a higher allocation is needed than 1 for 3% of dwellings. At that density it is not possible to minimise distance etc or meet legitimate demand. However the spaces should be reserved for electric vehicles, with facilities for charging from renewable sources.

User: Cllr Richard Chatterjee

Policy T6.1 Residential parking Table 10.3

Comment:

A reduction in Parking Standards with an insistence that new developments that are (or planned) near “well connected by public transport” should have zero parking provision is inappropriate without a clear definition of what is meant by “well connected by public transport” and the relationship with local PTAL.

Recommendation:

Define what is meant by ‘well connected by public transport’ otherwise any Bus Stop could be considered a point ‘well connected by public transport’. If at a single route bus stop, it might not provide any local occupant with a route they require and therefore private transport (i.e. a car) may be necessary.

Table 10.3 allows car parking provision at various PTAL’s but case officers could argue that random (undefined) closeness to a local Bus Stop indicates that a development should be ‘Car Free’ when in fact such a decision would be inappropriate.

User: Redrow Homes London Division.

Table T6.1 does not recognise that it may be appropriate to provide flexibility in terms of car parking provision.
In addition, unlike the approach set out in the adopted London Plan, Table 10.3 of the draft London Plan does not provide differentiated standards based on the number of beds provided. For example, homebuilders' experience is that households with children are much more likely to find they require a car. Experience demonstrates that young families are also disproportionately likely to be purchasers of family-sized homes in new developments.

Policy T6.1 should be revisited to allow flexibility in circumstances where an applicant agrees with the local Borough and the local community that higher levels of provision are more appropriate.

Table 10.3 should be redrafted to recognise that higher levels of provision may be suitable where homes have 2 or more beds.

User: Redrow Homes London Division.

The draft London Plan states that ‘at least 20 per cent of spaces should have active charging facilities, with passive provision for all remaining spaces’.
This proposed policy approach may see applicants asked to secure and reserve capacity from an already constrained electricity grid. This could see capacity on the grid ring-fenced for a change (a conversion from passive to active provision) that never happens. This would be an inefficient use of infrastructure.
Alternatively, the proposed policy approach might see applicants asked to integrate substations within developments to deliver electricity that is never required. This would be an additional infrastructural cost. Designing in additional substations could have knock-on design effects that detract from a scheme and its wider contribution to the local area (for example upon active frontages and/or upon the public realm through allowing for access).

The draft London Plan should set out a clear position on the points raised. It should be explicit that i) applicants are not expected to reserve capacity on the grid ii) contributions should not be sought and iii) substations should not be sought to provide future capacity that may never materialise. It should also be explicit that any contributions / obligations sought would detrimentally affects a scheme’s ability to address other planning objectives, including the delivery of affordable housing.

User: Berkeley Group

11.7. New development represents about 1% of London’s housing stock. Restricting parking in new developments will not fundamentally address congestion/air quality in London, but will make older stock more attractive to the many people to whom it is important to have a car. Car-free development is challenging and that policy should promote reduced, rather than no parking. Parking is particularly important for some households such as older people, those with caring responsibilities and families. Table 10.3 should be amended to replace ‘car free’ with up to 0.25 spaces per home. Provision of spaces for car clubs should not be counted as part of the residential parking allowance.

11.9. It is not appropriate for the London Plan to seek to determine whether parking spaces are sold or leases. T6.1 B should be deleted.

User: L&Q

Residential parking standards

Table T6.1 does not recognise that it may be appropriate to provide flexibility in terms of car parking provision. In addition, unlike the approach set out in the adopted London Plan, Table 10.3 of the draft London Plan does not provide differentiated standards based on the number of beds provided. For example, homebuilders' experience is that households with children are much more likely to find they require a car. Experience demonstrates that young families are also disproportionately likely to be purchasers of family-sized homes in new developments.

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User: L&Q

Electrical vehicle charging points

The draft London Plan states that ‘at least 20 per cent of spaces should have active charging facilities, with passive provision for all remaining spaces’. This proposed policy approach may see applicants asked to secure and reserve capacity from an already constrained electricity grid. This could see capacity on the grid ringfenced for a change (a conversion from passive to active provision) that never happens. This would be an inefficient use of infrastructure. Alternatively, the proposed policy approach might see applicants asked to integrate substations within developments to deliver electricity that is never required. This would be an additional infrastructural cost. Designing in additional substations could have knockon design effects that detract from a scheme and its wider contribution to the local area (for example upon active frontages and/or upon the public realm through allowing for access).

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User:	London and Continental Railways

We also note that there is a lack of clarity in the draft London Plan in relation to how disabled parking is delivered as part of a car-free development. Draft London Plan Policy T6.1 states that one designated disabled person's bay per dwelling should be provided for 3% of dwellings from the outset, with the remaining bays to a total of one per dwelling for 10% of units to be requested and provided when required as designated disabled persons parking in the future. This is, however, clearly difficult to plan for within a development and the Plan should clarify whether, notwithstanding that a development is car-free, 10% of the dwellings should be provided with a car parking space.

User: London Borough of Camden

Camden welcomes the overall ambition to reduce the provision for car parking while ensuring that those with essential need to drive, particularly disabled people, can have access to a car. We welcome the support for boroughs wishing to adopt borough-wide or other area-based car free policies. We also welcome the requirement not only to be car-free in high PTAL areas, but also within 800m of Town Centres.

However, there is some confusion and a lack of clarity regarding the different criteria used to establish maximum car parking levels both within and across different uses. PTAL, CAZ, and inner and outer London are all factors used to determine parking standards, but they are applied inconsistently and the reason for particular standards is not explained and unclear. The approach in the Plan should therefore be made clear and amended to ensure consistency. We also request clarification on the rationale for the maximum number of spaces attributed to each use and the variations between them.

For example, residential parking standards for PTAL 4 in inner London require car-free, while PTAL 4 in Outer London allows up to 0.5 spaces per unit. The maximum level for PTAL 3 also differs for inner and outer London (Table 10.3). It is not clear why inner and outer London are differentiated in this way if PTAL (4) is used as the criterion Meanwhile all hotels and leisure uses, in both inner and outer London (Policy 6.4) in PTAL 4 are car-free.

Similarly, Policy 6.3, retail parking (Table 10.5), allows for parking at all locations in inner London below PTAL 5. This means that parking could be provided in a retail development in inner London PTAL 4, even though residential parking in this category is car-free. The standard for this class use also differentiates between inner and outer London, where the parking standard for inner London (below PTAL 5) is on a par with Outer London, regardless of PTAL.

Policy T6.1, residential parking, criterion D states that, for areas outside the Central Activities Zone (CAZ), car clubs may be provided in lieu of parking. This suggests that parking could be provided outside the CAZ, even though many of these areas, particularly in inner London, may have a PTAL of 4-6, or be close to a Town Centre, and should therefore be car-free. This is inconsistent with the provision in Table 10.3.

We would recommend for consistency that, as a minimum, all developments in PTAL 4, regardless of use class, should be car-free. In addition, the standard for PTAL 3 should apply equally to both inner/outer London locations. In addition, criterion D in Policy T6.1 (residential parking and car clubs), should be removed as it is not necessary. Alternatively it should be amended to provide a generic statement to say, for example, that where parking is implemented in line with the standards in the Plan, they should also give consideration to car clubs.

On this basis, we agree that car clubs should be provided to help encourage people to give up personal vehicles, and that these should replace, not be in addition to, agreed parking. We suggest that the London Plan set a standard for car clubs to replace parking at a ratio of a minimum of 1 car club space for every 6 private parking spaces. This is based on the research which demonstrates that a car club removes from 6 to 20 cars from the road.

Maximum parking standards have not been provided for some use classes, including B2-B8 (General industrial, storage or distribution), C2 (Hospitals, Care homes, secure accommodation), D1 (Various), and train stations. Also there is a lack of clarity on requirements for motorcycle parking.

Camden supports the view that disabled parking should be provided for essential users as outlined in Policies T6.1 and T6.5. Provision of disabled bays on-site in car free developments could result in abuse of the available spaces if no disabled users occupy the premises. Camden would therefore recommend that in the first instance all essential parking should be provided on-street to ensure that the highway authority can manage and enforce them, and not lead to an increase in parking provision for other users, in line with the draft Mayor's Transport Strategy.

With regard to Policy T6.2 criterion D, for office car parking to secure a commitment to reduce car parking over time through the Travel Plan process, we suggest that this could be enhanced further by encouraging boroughs to consider the introduction of a Work Place Parking Levy for managing parking demand from commuting.

User:	Blanche Cameron

A more strict approach is needed to reduce reliance on the private car, including reduced parking provision in new developments and promotion of more sustainable transport modes.

User:	Hackbridge & Beddington Corner Neighbourhood Development Group

We note that in Table 10.3 – maximum residential parking standards, the number of parking spaces per dwelling for new developments have generally been reduced. There needs to be
more criteria than just whether you are in inner or outer London and PTAL levels. Many outer London boroughs suffer from overcrowding on public transport without additional
developments. Unless there are local jobs available, residents will need to travel to find work.

Policy T6.2 Office parking

User:	Campaign for Better Transport

Please see attachment for full detail:

"8. The car parking standards for outer London (policies T6.1, T6.2 and T6.3) seem unnecessarily generous and difficult to reconcile with the welcome objective of increasing to 80% the proportion of journeys to be made by sustainable modes of transport. In particular, we cannot envisage any circumstances in which the provision of more than one space per residential unit could be justified."

User:	London Borough of Hammersmith and Fulham

(G) A Car Park Design and Management Plan should be submitted alongside all applications which include car parking provision.

The above policy point can be made more ambitious for sites in areas of poor air quality by further encouraging the uptake of Ultra Low Emission Vehicles

A change in the text to point G:

A Car Park Design and Management Plan should be submitted alongside all applications which include car parking provision *indicating how it will incentivise and prioritise any vehicle parking provision for Ultra Low Emission vehicles on the site in areas of poor air quality*.

User:	London Forum of Amenity and Civic Societies

Policy T6.2: Office Parking

London Forum **supports** the revised parking standards. These parking standards will reinforce the need for new office developments to choose locations in high PTAL areas, especially near stations and in town centres.

User: King and Company Ltd

In the context of mixed use developments, there will be a need to recognise that the parking resource for office space can meet the needs of different users at different times of the day.

In highly accessible locations, it would ideally be encouraged that users of the site would typically choose non-car modes because they have the choice and opportunity to use public transport for many of their journey requirements.

In some instances, office users can (even in relatively accessible locations) demand on-site parking in much the same way as they would if located at a satellite location. There is therefore a challenge to encourage office occupiers to take space in highly accessible locations and (over time) recognise that their staff do not need a large supply of parking. However, to impose substantial restrictions on parking supply for office uses on a blanket basis (even in PTAL5 locations) might well impede the ability to secure occupiers in the more marginal locations in the Outer London area.

We therefore encourage a flexible and pragmatic approach to the implementation of this policy and the weight to be afforded to it.

User:	Royal Borough of Kensington and Chelsea

10.8 Policy T6.2 Office parking

The Council supports car free new office accommodation in Inner and Central London. The Council also supports the Draft London Plan's approach to industrial and to warehousing uses.

The requirement that electric charging infrastructure be provided within operational parking facilities is welcome.

The Council recommends the following amended wording to part G of Policy T6.2, to prioritise the provision of Ultra Low Emission vehicles:

"A Car Park Design and Management Plan should be submitted alongside all applications which include car parking provision indicating how it will incentivise and prioritise any vehicle parking provision for Ultra Low Emission vehicle on the site. "

User: Motorcycle Industry Association

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Recognition that a 25% modal shift among commuters from car to PTW use would significantly lower or even eliminate congestion (see point 18 below). This shift would require provision for secure motorcycle and scooter parking in central London to be expanded by 205,000 spaces.

2. The current Draft New London Plan refers to PTWs only in the context of motorcycle parking (p.422), and otherwise omits them entirely. The emphasis placed in the Draft New London Plan, and in the Mayor's Transport Strategy, on rebalancing London's transport system from car use towards walking, cycling and public transport, is admirable but, again, erases or overlooks PTW use.

9. ePTWs have the advantage of being able to charge via any 3-pin domestic outlet. Increasingly, PTWs are supplied with 'cartridge' style batteries that can be swapped at home or work, which is ideal for those without off street parking or those who live in flats (whilst also increasing the security of the vehicle). This offers significant benefit as charging infrastructure is not a pre-requisite.

• PTWs to be recognised along with walking, cycling and public transport as a low-pollution and congestion-busting alternative to car and van use. While an increase in the number of electric cars in London will do nothing to reduce congestion or wear and tear on London's roads and infrastructure, encouraging the use of ePTWs offers an efficient solution to both congestion and air pollution.

• The roll-out of charging points for electric vehicles to include provision for ePTWs at all residential and commercial developments.

GROWTH AND POTENTIAL OF THE LOW-EMISSION EPTW MARKET

5. The UK market for electrically powered two-wheeled vehicles (ePTWs) has great potential. Although new registrations of road-going machines have been limited by low product availability, major PTW manufacturers are now in the process of announcing new products for market release, which should increase uptake. Research and development on ePTWs is also gaining momentum and is viewed as a key part of the industry's future.

6. An increase in the proportion of ePTWs within the national fleet would reduce overall emissions in terms of CO2 and other pollutants. In turn, this would help London meet its targets in reducing CO2 emissions and significantly improving air quality.

7. The UK market for commuter PTWs has been growing steadily for the last five yearsii. ePTWs will form a significant part of this market provided effective support is offered to encourage it to grow, including through making the UK market more attractive to manufacturers. By contrast with the UK electric car market, the ePTW market will need support in order to gain sustained market traction. This in turn will encourage manufacturers to place more quality product at a volume, and therefore price point, comparable to ICE product.

8. This support should include acceptance of the PTW into general transport policy, including a further expansion of access to bus lanes at borough level. Additionally, additional funding could be aimed at ePTW research and development in London to encourage new and innovative two-wheeled product.

9. ePTWs have the advantage of being able to charge via any 3-pin domestic outlet. Increasingly, PTWs are supplied with ‘cartridge’ style batteries that can be swapped at home or work, which is ideal for those without off street parking or those who live in flats (whilst also increasing the security of the vehicle). This offers significant benefit as charging infrastructure is not a pre-requisite.

10. However, we note the efforts made and the range of grant schemes available to support the installation of charging infrastructure on-street, off-street and at workplaces, and the Chancellor’s announcement in Autumn 2017 of a new £400m electric vehicle Charging Infrastructure Investment Fund. We would argue that the roll-out of charging points for electric vehicles should include provision for ePTWs at all residential and commercial developments.

11. We note that the city of Paris, in addition to a subsidy scheme for the purchase of electric motorcycles, is building terminals to recharge these vehicles for free. Many European cities, such as Brusselsiii and including Parisiv, have an on-street scooter sharing scheme available for public use.

PARKING

28. We note the Draft New London Plan’s specific mention of motorcycling on p.422 regarding parking provision: “Motorcycle parking will be evaluated on a case-by-case basis. Where provided, each motorcycle parking space should count towards the maximum for car parking spaces at all land uses.”

29. We would further note that there is an urgent need for additional on-street secure motorcycle and scooter parking in central urban areas.

30. Points 18-20 above outline the improvements to congestion which could be generated by a modal shift from car to PTW use among commuters. Any such shift – ideally to a situation where 25% of vehicles used to commute into London are PTWs – would require a proportionate increase in the number of parking spaces available for PTWs. We estimate the number of extra parking spaces required to be around 205,000. Building these extra spaces would incur less cost and disruption than the building of new train or tube infrastructure to cope with increased numbers of commuters.

31. We would further suggest that, where parking provision is made for ePTWs, this should be targeted at transport hubs such as stations and airports (as recommended in the IHE guidelines on motorcycle infrastructure)xv.

User:	London Borough of Barnet

These policies stipulate: new housing and office developments that are in areas well connected by public transport are expected to be car-free, and that Outer London maximum parking standards are set for offices and retail developments (numbers of spaces based on quantum of floorspace). The definition of well-connected areas includes Major Town Centres (i.e. Edgware) and all areas with a PTAL score of 5-6 with the level of parking required determined by the location of the development and its PTAL score. Barnet currently accepts London Plan standards on non-residential developments. As we move forwards with our new Local Plan we will examine the impact of proposed new residential and non-residential parking standards in the DLP and justify a policy framework that better responds to local circumstances.

User:	Wheels for Wellbeing

Whilst we welcome plans for all residential car parking spaces to provide infrastructure for electric or Ultra-Low Emission Vehicles (including charging points), an equivalent policy must also be developed to encourage and support the use of e-cycles. Furthermore, we oppose provision of charging points which result in trailing leads and/or which are positioned on the footway, as these create hazards for disabled people.

User:	London Borough of Lewisham

Questions have been raised with T6.2 as the proposed parking standard for Office B1 in Inner London to be car-free will have an impact in locations where there is no CPZ to control/restrict. Likewise, the proposal for retail in PTAL 5 and 6 to be car-free will have an impact in locations where there is no a CPZ.

User:	London Borough of Brent
The Council supports this policy.	

User:	London Borough of Bromley
The Council is concerned about the proposed parking provision applied to Outer London Opportunity Areas.	

User:	London Borough of Tower Hamlets
Support this policy as helps with managing growth in car traffic during peak times.	

User:	Royal Borough of Kingston

RBK is aware of the impact of office and retail parking standards on its town centres, including Kingston Metropolitan Town Centre, the third largest town centre in London after the West End and Shepherds Bush. These town centres, particularly Kingston, have a broad catchment from across London and into Surrey and other neighbouring Home Counties. However, public transport accessibility is relatively poor in comparison with other town centres across London, particularly those of equivalent Metropolitan status. Limiting car parking in the way proposed could make RBK's town centres less competitive, with implications for economic performance; parking is already cited as one of the main issues in Kingston town centre. The approach, which is more appropriate to CAZ, may have implications for RBK's town centres which are competing with Surrey neighbours where less stringent parking provision apply. If policy T6.2 is taken forward, clarification is sought whether higher parking levels can be set in a DPD in the Kingston Opportunity Area. This is not clear within Table 10.4 and could usefully be detailed within the policy or the supporting text.

User: Westminster City Council

Whilst the Mayor's ambitions of reducing reliance on cars is understood, proposed parking standards in tables 10.3 – 10.5 provide an overly simplistic approach that fails to take any account of local context, or allow boroughs any scope to do so. It also fails to address the main causes of congestion in central London, recognise existing low levels of car use in high PTAL areas, or acknowledge other factors that influence car ownership such as income or size of household.

Requiring that new developments do not provide any off-street car parking provision on-site does not necessarily result in developments being "car free", and can result in increased demand for on-street parking. However, policy as drafted does not address on-street parking demand. Given the pressures on kerb space in Westminster there is a pressing need to take a holistic view of parking policy; the simplistic approach taken in the DRLP militates against this objective.

The Mayors Transport Strategy identifies congestion as a result of increased private hire vehicles and servicing/ freight as the main issue in central London (page 71), rather than residents' car parking. Parts of London such as Westminster face unprecedented pressure on kerb space from multiple uses. It is likely that insisting most new development provide no dedicated off–street parking will increase on-street parking stress, leading to further congestion, road safety issues, and business servicing difficulties. It also fails to recognise that across much of London, it is not just disabled person's that have mobility issues that make them more reliant on car use, but also families with small children. The policy therefore has implications for protected equalities groups.

Reference to blue badge holders in criterion D does not reflect practice in all boroughs, so the policy should instead simply refer to disabled persons parking to be more universal.

It is noted that paragraph 10.6.3 states car club spaces should be included within maximum car parking provision and not in addition to it. When read alongside table 10.3, this equates to an outright ban on car clubs in new developments in most of inner London, despite such schemes being recognised as reducing car ownership dependency.

Finally, the assertion in paragraph 10.6.7 that motorcycle parking should count towards maximum car parking spaces fails to recognise the differing space requirements and types of users this mode of transport typically has to car use.

User:	London Borough of Hounslow

LB Hounslow generally agrees with encouraging sustainable transportation through restricted parking provisions in areas where public transportation levels are high. In response to T6.2B not all Opportunity Areas are well served by public transportation, such as the two areas in Hounslow. Until game changing infrastructure, such as the Southall Crossrail Link, the West Orbital line with a station at Lionel Road, and the Southern Rail Access link with a station at Bedfont, are provided Hounslow's Opportunity Areas remain under served by the public transport needed to support growth. In these areas car-free development may not be appropriate.

User:	London Borough of Richmond Upon Thames
General support as consistent with Local Plan approach	

User:	London Borough of Enfield

Policy T6.2 ‘Office Parking’ is not progressive as the Plan states maximum parking standards, given the focus on reducing residential car parking.

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

User:	Mr Peter Davies

A more strict approach is needed to reduce reliance on the private car, including reduced parking provision in new developments and promotion of more sustainable transport modes.

User:	London Borough of Bexley

Part E of **Policy T6.2 Office parking** should clarify as to whether the reference to borough-wide means a single, higher standard, rather than higher standards in different geographical parts of the borough under **Part D** of **Policy T6.2**.

User: LEVC

Policy T6.2 Office parking

- LEVC supports the commitment for all operational parking to provide infrastructure for electric or other Ultra-Low Emission vehicles, including active charging points for all taxi spaces.
- However, LEVC would urge the Mayor to urgently review and improve his definition of active charging points to assist developers and installers.

User: Rosalind Readhead

The car parking standards for outer London (policies T6.1, T6.2 and T6.3) seem unnecessarily generous and difficult to reconcile with the welcome objective of increasing to 80% the proportion of journeys to be made by sustainable modes of transport. We already have 6.8 million parking spaces taking up more than 78.5 km sq. We cannot afford to allocate any more precious floor space or land to this economically illiterate use of prime land. Carfree development must cover the whole of Greater London not just CAZ.

User: Federation of Small Businesses

FSB London feels there are some omissions in policy T6.2:

There is a need for a policy on coach parking, in particular in Central London and associated with major event and tourist locations.

The draft London Plan includes no policies for parking at transport interchanges. There is considerable parking available at rail stations in London, in particular at suburban locations, and of course outside London, and some provision at coach interchanges. The London Plan must indicate how these existing spaces are to be managed, in particular those under the direct control of the Mayor through TfL, including either expansion opportunities or managing demand (either through pricing or limiting capacity). For station car parks outside London there should be a cross reference to Policy SD2 on Collaboration in the Wider South East in Chapter 2. Car parking at airports can be covered in Policy T8 on Aviation.

There is an omission in policies for public car parking. There are large amounts of car parking provided in multi-use car parks in town centres, central London and event locations and, of course, even larger numbers of spaces on streets. While the standards indicate the numbers of spaces associated with retail, office, residential and other uses, the draft London Plan includes no overall policy on this major area of provision.

User:	Federation of Small Businesses
Boroughs could include provision for sharing residential parking during the day to provide short-term parking that supports local high streets.	

User:	Federation of Small Businesses

It is important to be able to accommodate non-standard office operations and to recognise that for some types of businesses operating outside regular office hours, more parking may be required to ensure staff safety and availability.

User:	Rosalind Readhead

And how much potential housing and office floor space will be lost to more car storage? We must have no more car parking in London. We need clear reductions in parking and car infrastructure to facilitate maximum usage of prime land for housing.

User:	British Property Federation

We are pleased that the Mayor is seeking to make the most efficient use of land. However, before specifying car-free areas in the centre of London and minimal parking spaces in Outer London Opportunity Areas, adequate transport infrastructure to these areas needs to be in place.

User: 313-349 Ilderton Road LLP

Policy T6.2 Office parking states that the maximum parking standards set out in Table 10.4 should be applied to new office development and in well-connected parts of outer London, including town centres, in close proximity to stations and in Opportunity Areas, office developments are encouraged to be car-free.

This policy is supported.

User:	Living Streets

We support policy T6.2 and strongly support car free office parking standards in the Central Activities Zone and Inner London where we would expect to see journeys completed on foot.

We strongly support “D - recognising the major negative impacts that would accompany more generous standards in Outer London and the requirement for suitable justification”.

User:	HB Reavis UK Limited

HB Reavis support the overall approach to reducing car parking and in particular welcome the aspiration for car free office development in central London. We also support the need for operational parking being determined on a case by case basis. It would also be of benefit to recognise in the plan that blue badge parking may not be necessary where fully DDA compliant public transport services are available, as would be the case at Waterloo.

User:	London Travel Watch

London TravelWatch recognises that parking management is a necessary tool to manage available road space, and in those locations that are well served by public transport can be used to manage demand for private vehicle travel. We support these policies.

Car-free and ‘car-lite’ policies will allow development at densities that would not otherwise be possible in locations that are well connected to public transport. These policies are supported. They could also reduce the impact of traffic on the local road network. However, restricting car parking within the curtilage of a large-scale development may lead to parking pressure on the public highway if there are insufficient on-street parking controls in place. The text of this policy should refer to the need for on-street controls and controlled parking zones associated with car-free development.

User:	Bishopsgate Goods Yard Regeneration Limited

Our client welcomes the commitment to ensure that new developments are provided with suitable parking provision and the associated infrastructure for electric or Ultra-Low Emission vehicles. However, the policy should ensure that an appropriate level of parking, including blue badge, comes forward for each development.

User: London Borough of Newham

Policy T6.2 Office Parking

LBN conditionally support this policy which is broadly complementary to Newham's Draft Revised Local Plan. It should be noted the majority of the borough is subject to 'car free' maximum standards, which has some implications in relation to the local standards approach set out in the Draft Revised Local Plan.

Parking policy for B2/B8 uses however should be separated from office parking policy, for example as 'non residential parking' (T6.2) as the nature of parking requirements for offices and commercial B2/B8 is different (including shift work 24 hours a day), and may present further challenges in people's access to employment.

It is also important to highlight that B2/B8 car parking should be applied flexibly (T6.2C). In large areas of existing and protected SIL (and in Newham's context Local Industrial Locations) with varying PTALs it may not be appropriate for car-free on these sites

User:	Imperial College London

Whilst Imperial College London supports the Mayor’s objectives of reducing dependency on cars and encouraging more cycling, walking and public transport, very low levels of parking can still be necessary. It is therefore requested that Table 10.4 be expanded to split the first box so that the remainder of inner London is treated differently from the Central Activities Zone. It is requested that whilst the text can encourage car free development elsewhere within inner London, low levels of parking below one space per 1,000 sq m could be considered in individual cases. This will allow for the very low level of visitor and operational car parking that can be essential in certain sectors.

User: London Borough of Ealing

Office Parking
(T6.2)

The current London Plan parking standards are between 1 space per 100sqm and 600sqm. The draft plan proposes that in opportunity areas the standard is revised to 1 per 600sqm and for other areas to have up to a level of 1 per 100sqm. The Council is concerned that this would limit our ability to restrain parking in non-opportunity areas.

The reference to car parking standards for use classes B2 and B8 in Clause C is welcomed but for better clarity and ease of reference it may be better to have a stand-alone policy dealing with industrial uses.

The level of electric vehicle charge-point provision required needs to be clearly clarified for this type of development.

User:	Sustrans

We welcome the approach set out in T6.2.
B - We are concerned the language is too weak regarding well connected office developments and those in opportunity areas, where “office developments are encouraged to be carfree”
We particularly support clauses:
D - recognising the major negative impacts that would accompany more generous standards in Outer London and the requirement for suitable justification; and
E – Requiring a more nuanced approach to more generous standards by boroughs than simple borough-wide, which would fail to reflect the varying accessibility, density and trip generating characteristics of areas within the borough.

User:	Hornsey & Wood Green Labour Party

The priority here should be to implement Workplace Parking Levy schemes.

User:	Mr Sydney Charles

Where parking is justified the spaces should have access to electric charging facilities, supplied by renewable sources.

User:	Cross River Partnership
We are supportive of offices in the CAZ being car-free, due to the concerns about air quality and the need to support sustainable forms of transport.	

User:	Unknown

Our client is pleased that the mayor is seeking to make the most efficient use of land. However, before specifying minimal parking spaces in Outer London Opportunity Areas, adequate transport infrastructure and provision for future funding needs to be in place to these areas, particularly in Outer London.

User: London Borough of Camden

Camden welcomes the overall ambition to reduce the provision for car parking while ensuring that those with essential need to drive, particularly disabled people, can have access to a car. We welcome the support for boroughs wishing to adopt borough-wide or other area-based car free policies. We also welcome the requirement not only to be car-free in high PTAL areas, but also within 800m of Town Centres.

However, there is some confusion and a lack of clarity regarding the different criteria used to establish maximum car parking levels both within and across different uses. PTAL, CAZ, and inner and outer London are all factors used to determine parking standards, but they are applied inconsistently and the reason for particular standards is not explained and unclear. The approach in the Plan should therefore be made clear and amended to ensure consistency. We also request clarification on the rationale for the maximum number of spaces attributed to each use and the variations between them.

For example, residential parking standards for PTAL 4 in inner London require car-free, while PTAL 4 in Outer London allows up to 0.5 spaces per unit. The maximum level for PTAL 3 also differs for inner and outer London (Table 10.3). It is not clear why inner and outer London are differentiated in this way if PTAL (4) is used as the criterion Meanwhile all hotels and leisure uses, in both inner and outer London (Policy 6.4) in PTAL 4 are car-free.

Similarly, Policy 6.3, retail parking (Table 10.5), allows for parking at all locations in inner London below PTAL 5. This means that parking could be provided in a retail development in inner London PTAL 4, even though residential parking in this category is car-free. The standard for this class use also differentiates between inner and outer London, where the parking standard for inner London (below PTAL 5) is on a par with Outer London, regardless of PTAL.

Policy T6.1, residential parking, criterion D states that, for areas outside the Central Activities Zone (CAZ), car clubs may be provided in lieu of parking. This suggests that parking could be provided outside the CAZ, even though many of these areas, particularly in inner London, may have a PTAL of 4-6, or be close to a Town Centre, and should therefore be car-free. This is inconsistent with the provision in Table 10.3.

We would recommend for consistency that, as a minimum, all developments in PTAL 4, regardless of use class, should be car-free. In addition, the standard for PTAL 3 should apply equally to both inner/outer London locations. In addition, criterion D in Policy T6.1 (residential parking and car clubs), should be removed as it is not necessary. Alternatively it should be amended to provide a generic statement to say, for example, that where parking is implemented in line with the standards in the Plan, they should also give consideration to car clubs.

On this basis, we agree that car clubs should be provided to help encourage people to give up personal vehicles, and that these should replace, not be in addition to, agreed parking. We suggest that the London Plan set a standard for car clubs to replace parking at a ratio of a minimum of 1 car club space for every 6 private parking spaces. This is based on the research which demonstrates that a car club removes from 6 to 20 cars from the road.

Maximum parking standards have not been provided for some use classes, including B2-B8 (General industrial, storage or distribution), C2 (Hospitals, Care homes, secure accommodation), D1 (Various), and train stations. Also there is a lack of clarity on requirements for motorcycle parking.

Camden supports the view that disabled parking should be provided for essential users as outlined in Policies T6.1 and T6.5. Provision of disabled bays on-site in car free developments could result in abuse of the available spaces if no disabled users occupy the premises. Camden would therefore recommend that in the first instance all essential parking should be provided on-street to ensure that the highway authority can manage and enforce them, and not lead to an increase in parking provision for other users, in line with the draft Mayor's Transport Strategy.

With regard to Policy T6.2 criterion D, for office car parking to secure a commitment to reduce car parking over time through the Travel Plan process, we suggest that this could be enhanced further by encouraging boroughs to consider the introduction of a Work Place Parking Levy for managing parking demand from commuting.

Policy T6.3 Retail parking

User:	MS J GELLER

How ridiculous that one would visit a retail park with the idea of purchasing a large amount of goods and then not be able to get them home using a vehicle as there was nowhere on site to park it. This concept is going to lower the amount that people spend in shops and more retailers will go bankrupt.

A lot of shopping is impulse buy. One drives past and decides on impulse to visit. If there are no parking spaces on site and it is too difficult to find one nearby then the retailer loses out.

User:	Mrs Marilyn Mason

We support local shopping centres well connected to public transport and cycling and walking networks, to reduce the need for travel by car and car parking and the reduced air quality that goes with road traffic.

User:	Campaign for Better Transport

Please attached document for full detail:

"8. The car parking standards for outer London (policies T6.1, T6.2 and T6.3) seem unnecessarily generous and difficult to reconcile with the welcome objective of increasing to 80% the proportion of journeys to be made by sustainable modes of transport. In particular, we cannot envisage any circumstances in which the provision of more than one space per residential unit could be justified."

User:	London Borough of Hammersmith and Fulham

(D) A Car Park Design and Management Plan should be submitted alongside all applications which include car parking provision

The policy can be made more ambitious for sites in areas of poor air quality by further encouraging the uptake of Ultra Low Emission Vehicles

The insertion of the following text into point D

A Car Park Design and Management Plan should be submitted alongside all applications which include car parking provision *indicating how it will incentivise e.g. fiscally by means of differentiated parking fees and prioritise any vehicle parking provision for Ultra Low Emission vehicles on the site in areas of poor air quality.*

User:	London Forum of Amenity and Civic Societies

Policy T6.2: Office Parking

London Forum **supports** the revised parking standards. These parking standards will reinforce the need for new office developments to choose locations in high PTAL areas, especially near stations and in town centres.

User: Royal Borough of Kensington and Chelsea

10.9 Policy T6.3 Retail parking

The Council supports this policy's aim that extant and new off street retail parking should be used as effectively as possible to justify the use of land for this purpose. We agree that surplus car parking should be converted into other uses. The Council recommends the following amended wording to part D of Policy T6.2, to prioritise the provision of Ultra Low Emission vehicles:

"A Car Park Design and Management Plan should be submitted alongside all applications which include car parking provision indicating how it will incentivise e.g. fiscally by means of differentiated parking fees and prioritise any vehicle parking provision for Ultra Low Emission vehicles on the site."

User: Motorcycle Industry Association

2. The current Draft New London Plan refers to PTWs only in the context of motorcycle parking (p.422), and otherwise omits them entirely. The emphasis placed in the Draft New London Plan, and in the Mayor's Transport Strategy, on rebalancing London's transport system from car use towards walking, cycling and public transport, is admirable but, again, erases or overlooks PTW use.

12. As noted in the Draft New London Plan (p.88, p.100, p.258), the ongoing development and restructuring of London's professional and retail spaces has necessitated changes in the logistics of freight and deliveries, in order to develop more creative solutions for efficient and non-disruptive transport of goods to workplaces, homes and pick-up points.

• Recognition that a 25% modal shift among commuters from car to PTW use would significantly lower or even eliminate congestion (see point 18 below). This shift would require provision for secure motorcycle and scooter parking in central London to be expanded by 205,000 spaces.

9. ePTWs have the advantage of being able to charge via any 3-pin domestic outlet. Increasingly, PTWs are supplied with 'cartridge' style batteries that can be swapped at home or work, which is ideal for those without off street parking or those who live in flats (whilst also increasing the security of the vehicle). This offers significant benefit as charging infrastructure is not a pre-requisite.

PARKING

28. We note the Draft New London Plan's specific mention of motorcycling on p.422 regarding parking provision: "Motorcycle parking will be evaluated on a case-by-case basis. Where provided, each motorcycle parking space should count towards the maximum for car parking spaces at all land uses."

29. We would further note that there is an urgent need for additional on-street secure motorcycle and scooter parking in central urban areas.

30. Points 18-20 above outline the improvements to congestion which could be generated by a modal shift from car to PTW use among commuters. Any such shift – ideally to a situation where 25% of vehicles used to commute into London are PTWs – would require a proportionate increase in the number of parking spaces available for PTWs. We estimate the number of extra parking spaces required to be around 205,000. Building these extra spaces would incur less cost and disruption than the building of new train or tube infrastructure to cope with increased numbers of commuters.

31. We would further suggest that, where parking provision is made for ePTWs, this should be targeted at transport hubs such as stations and airports (as recommended in the IHE guidelines on motorcycle infrastructure)xv.

User:	Confederation of Passenger Transport

CPT would encourage coach parking to be provided in retail locations of any significant size and which could benefit from attracting group visits by coach. A number such as Westfield already provide facilities which are available to outside users and supplements the overall stock of parking.

User: Kew Society

Paragraph 10.6.15 acknowledges that Retail Developments are “significant trip attractors”, or put another way, they generate increased road traffic. Overall the Mayor’s policies aim to reduce road traffic in London. Ideally we would like to see a policy which bans the developments of any further retails parks with large car parks, thereby avoiding increased traffic to such sites and promoting improved air quality. It is not enough to say that such developments “should be well connected by public transport”. Shoppers must be actively encouraged to use public transport, walk, or cycle, to new retail developments by minimising parking at them. We accept that a total ban on providing parking for the general public at such developments is unlikely so we propose that parking provision should be reduced by 50% over that proposed in Table 10.5. , i.e. it should not exceed one space per 150 m3 gross internal area for Inner London, or one space per 100 m2 GIA for Outer London. We note that research by Sustrans and other bodies, shows that shoppers who do not arrive by car spend more than those who do and that pedestrianisation increases turnover of retail businesses rather than decreasing it. See: (https://www.sustrans.org.uk/sites/default/files/170609_activetraveltoolbox_ec_whatworkswellv6.pdf), and the Department for Transport (https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/509587/value-of-cycling.pdf).

User: London Borough of Islington

Draft London Plan Policy

Policy T6.3 – Retail parking

Islington Response

This policy applies to all retail development, but we feel that a size threshold (500sqm+) would be useful, as smaller shops, especially in Inner London, will not attract vehicular traffic and are on the whole accessible by sustainable modes.

User:	London Borough of Barnet

These policies stipulate: new housing and office developments that are in areas well connected by public transport are expected to be car-free, and that Outer London maximum parking standards are set for offices and retail developments (numbers of spaces based on quantum of floorspace). The definition of well-connected areas includes Major Town Centres (i.e. Edgware) and all areas with a PTAL score of 5-6 with the level of parking required determined by the location of the development and its PTAL score. Barnet currently accepts London Plan standards on non-residential developments. As we move forwards with our new Local Plan we will examine the impact of proposed new residential and non-residential parking standards in the DLP and justify a policy framework that better responds to local circumstances.

User: British Land

Retail parking (Policy T6.3)

75. The draft New London Plan proposes that retail development (at any scale) in central London and areas of PTAL 5-6 should be car-free. We support the principle of reducing car use and encouraging shoppers to travel by other means, supporting the Healthy Streets approach to create better environments and a healthier population.

76. Nonetheless, we have several, serious concerns about this blanket approach, which is particularly onerous. Whilst PTAL measures public transport accessibility in terms of proximity to bus and rail services, it does not consider the coverage of those services in terms of origins and destinations and therefore is an incomplete measure. It is not appropriate, in our view, for the car parking standards in the draft New London Plan to be articulated solely in terms of a PTAL score and the broad location bands of central, inner and outer London.

77. Town centres have an important function in attracting investment and vibrancy to an area. We note that the National Planning Policy Framework 2012 (NPPF) says that “planning policies should be positive [and] promote competitive town centre environments” and that local planning authorities should “recognise town centres as the heart of their communities and pursue policies to support their viability and vitality”. The draft New London Plan conflicts with the plan-led approach and the framework set out in the NPPF.

78. From a development point of view, the success of retail and leisure activities in new town centre developments is a key component in generating the financial viability that is needed to support the delivery of a range of planning and community benefits. It is therefore essential that the Mayor’s parking policies recognise the important role that town centre car parking has to play in order to support the vitality and viability of a centre and ensure its competitiveness against other existing centres with car parking provision. As we have stated elsewhere in these representations, the retail market is facing multi-faceted challenges and can ill afford these further restrictions on trading capabilities. This is key to achieving inclusive access to everything a town centre offers and will also support the aspirations of the Mayor to promote a vibrant night-time economy and a range of cultural, arts and leisure offers in London.

79. Town centre development with low, or zero, car parking also increases the risk of overspill parking into surrounding streets. This in turn requires additional management of parking in the wider area, through Controlled Parking Zones and similar approaches, which may have other impacts and costs on the existing community.

80. More broadly, we are concerned that the car parking standards in the draft New London Plan do not specifically reference ‘town centres’ which consist of a range of uses, where parking demands change over the course of the day and there is potential for effective, shared use of parking spaces. We believe that the draft New London Plan should deal with parking for town centres as distinct from retail and leisure parking (which are dealt with separately in the draft). We also believe that this should reflect a hierarchy of town centre types, together with accessibility. In particular the draft New London Plan should acknowledge that new town centre facilities in Opportunity Areas should be permitted to have appropriate levels of parking, recognising that this will support the establishing of vital and viable centres for new communities, the needs of the retail and leisure industries and their business considerations about locating in these areas and changing customer behaviours over time. We acknowledge that a more graduated progression to reduced levels of parking may be an appropriate approach, which would both influence and reflect behaviours over the next 20 to 25 years, with the potential for car parking locations to be redeveloped or re-purposed over time as levels of car usage fall.

81. The Canada Water Masterplan will provide around 54% less parking than is on site today whilst delivering around a 250% increase in retail and leisure floorspace. We note that Policy T6.3B recognises that existing parking provision is a starting point for assessing need (“…the starting point for assessing the need for parking provision at all new retail development should be the use of existing public provision, such as town centre parking.”). The parking provision at Canada Water could be focused in one or two specific locations, will be available on a shared-use basis for all visitors to the development; and will not allocated to specific users or occupiers. We also intend to implement a suitable charging arrangement to avoid long-term parking by commuters or visitors to central London, allowing the effective use of a much smaller number of spaces than is currently available at the site. The charging regime will also take account of charges present at other locations in the primary and secondary retail catchment areas to ensure broad alignment across the wider area.

83. Our proposals at Canada Water will see around 80% of all car trips to the development being made by non-car modes. As such the car-borne mode share will be low for inner London and consistent with the Mayor’s aspiration for less than 20% of journeys being made by car. This will be unprecedented for a major town centre in London and poses a major challenge to British Land in attracting retailers and leisure operators to take space in an untested location.

84. We would encourage the GLA and TfL to convene a meeting of the leading retail and leisure operators in the UK / London to seek their views on the emerging policy and the London Plan’s general approach to the retail and leisure sector, town centres and high streets. British Land would be happy to use its excellent contacts with retailers and leisure operators to help set this up.

85. Until this meeting has taken place, we would urge the Mayor to reconsider his blanket approach to town centre car parking based on PTAL ratings and in Opportunity Areas which are as yet untested as retail destinations and permit some car parking to be provided to attract

tenants, investment and custom.

86. The proposed approach has the potential to jeopardise the viability and competitiveness of emerging and growing town centres and retail developments, which would contradict the strategic aims of the Plan.

87. We feel that there is a balance to be struck, in acknowledging the role that car parking has to play in the short-medium term whilst striving to meet the aspirations of the Healthy Streets Agenda in the longer term. We would encourage thee GLA / TfL to consider adopting a transitional arrangement based on a range of criteria in the future to allow for a move towards a much lower car parking environment in London - that might be supported by developers and retailers / leisure operators as it could be planned for and be brought into business planning and investment decision making.

User:	Canary Wharf Group

The exclusion of all non-disabled car parking for retail uses is considered impracticable,as some types of retail will always require some customer parking, such as for collectionof large/bulky goods. The standards should be amended to allow for more flexibility inthe allocation of car parking for retail uses.

User:	London Borough of Brent

The Council supports this policy.

Amend Policy T6.3D to:

"If on-site parking is justified it should be publicly-available and in accordance with local parking charges".

User:	London Borough of Bromley

The policy is noted. Local Plan Draft Policy 30 states that, with the exception of residential parking standards, all other parking standards must be met as per London Plan requirements.

User:	London Borough of Tower Hamlets

We are concerned by this policy as the maximum standards are too high across outer London and may mean that big box retail provision in outer London acts as a significant draw for car users – leading to an increase in traffic in our borough as well as surrounding areas.

User:	Royal Borough of Kingston

RBK is aware of the impact of office and retail parking standards on its town centres, including Kingston Metropolitan Town Centre, the third largest town centre in London after the West End and Shepherds Bush. These town centres, particularly Kingston, have a broad catchment from across London and into Surrey and other neighbouring Home Counties. However, public transport accessibility is relatively poor in comparison with other town centres across London, particularly those of equivalent Metropolitan status. Limiting car parking in the way proposed could make RBK's town centres less competitive, with implications for economic performance; parking is already cited as one of the main issues in Kingston town centre. The approach, which is more appropriate to CAZ, may have implications for RBK's town centres which are competing with Surrey neighbours where less stringent parking provision apply. If policy T6.2 is taken forward, clarification is sought whether higher parking levels can be set in a DPD in the Kingston Opportunity Area. This is not clear within Table 10.4 and could usefully be detailed within the policy or the supporting text.

User:	London Borough of Merton

Clarity is required on the parking approach for air rights development. A core objective of the plan is to achieve an 80% modal share by sustainable modes and public transport. Opportunity exists to intensify large retail sites with large car parks, with podium style residential development. Whilst retaining an element of the original retail parking below. In such instances, guidance on how parking standards should be applied would be helpful.

User:	Westminster City Council

Requirements under table 10.5 that any retail development in the CAZ or PTALs 5 and above must be car free, fails to recognise that the nature of some retail trips requires the customer to transport large and/ or heavy goods that is not always feasible by foot, cycle or public transport. Greater scope should be provided for the consideration of local context and the nature of the proposal.

User:	London Borough of Hounslow

LB Hounslow has concerns that this policy could lead to significant levels of parking within town centres or other well connected areas in outer London where we want to minimise levels of retail parking. There should differentiation to discourage developers from coming forward with proposals for too much parking.

User:	London Borough of Richmond Upon Thames

General support for Policy T6.3. However, it is considered that Table 10.5 could more usefully read “Outer London Retail above 500sqm up to 1 space per 50 sq.m gia”, for clarification purposes as the current wording is not consistent.

User:	London Borough of Harrow

The Council is concerned that there is insufficient parking provision for commuters from outside of the Borough, especially outside of London travelling in, where there is not a satisfactory public transport alternative.

User:	London Borough of Enfield

Policy T6.3 ‘Retail Parking’ does not take into account that retail trips are car dominant and that parking is important. Thus, there needs to be policy promoting electric parking, charging points and secure cycle parking should be encouraged in town centres and near retail development.

User:	Inclusion London

Policy T6.1 Residential parking

Policy T6.3 Retail parking

Policy T6.5 Non-residential disabled persons parking

Recommendation: Disabled people call for more blue badge parking bays to be allocated and for use of these by blue badge holders only to be enforced.

User:	Mr Peter Davies

A more strict approach is needed to reduce reliance on the private car, including reduced parking provision in new developments and promotion of more sustainable transport modes.

User: Rosalind Readhead

The car parking standards for outer London (policies T6.1, T6.2 and T6.3) seem unnecessarily generous and difficult to reconcile with the welcome objective of increasing to 80% the proportion of journeys to be made by sustainable modes of transport. We already have 6.8 million parking spaces taking up more than 78.5 km sq. We cannot afford to allocate any more precious floor space or land to this economically illiterate use of prime land. Carfree development must cover the whole of Greater London not just CAZ.

User:	Federation of Small Businesses

This sounds good in theory, however, many town centres have been blighted by the offer of free out of town centre parking that has driven custom away from high streets. New retail developments must take into consideration how any parking will impact on neighbouring town centres.

User:	Federation of Small Businesses

FSB London supports the sharing of office and retail parking to support small and micro businesses and believe that this concept should be extended to include residential parking during the day in mixed-use developments.

User:	Rosalind Readhead

And how much potential housing and office floor space will be lost to more car storage? We must have no more car parking in London. We need clear reductions in parking and car infrastructure to facilitate maximum usage of prime land for housing.

User:	Living Streets

We support policy T6.3 and strongly support car free retail parking standards in the Central Activities Zone and all areas of PTAL 5-6 where we would expect to see journeys completed on foot.

User:	London Travel Watch

London TravelWatch recognises that parking management is a necessary tool to manage available road space, and in those locations that are well served by public transport can be used to manage demand for private vehicle travel. We support these policies.

Car-free and ‘car-lite’ policies will allow development at densities that would not otherwise be possible in locations that are well connected to public transport. These policies are supported. They could also reduce the impact of traffic on the local road network. However, restricting car parking within the curtilage of a large-scale development may lead to parking pressure on the public highway if there are insufficient on-street parking controls in place. The text of this policy should refer to the need for on-street controls and controlled parking zones associated with car-free development.

User:	London Travel Watch

London TravelWatch recognises that parking management is a necessary tool to manage available road space, and in those locations that are well served by public transport can be used to manage demand for private vehicle travel. We support these policies.

Car-free and ‘car-lite’ policies will allow development at densities that would not otherwise be possible in locations that are well connected to public transport. These policies are supported. They could also reduce the impact of traffic on the local road network. However, restricting car parking within the curtilage of a large-scale development may lead to parking pressure on the public highway if there are insufficient on-street parking controls in place. The text of this policy should refer to the need for on-street controls and controlled parking zones associated with car-free development.

User:	Bishopsgate Goods Yard Regeneration Limited

Our client welcomes the commitment to ensure that new developments are provided with suitable parking provision and the associated infrastructure for electric or Ultra-Low Emission vehicles. However, the policy should ensure that an appropriate level of parking, including blue badge, comes forward for each development.

User: DTZ Investors

Objection is also raised to the proposed requirement of draft Policy T6.3 and Table 10.5 for development in the CAZ and areas with PTAL 5-6 to be car-free. Forcing new central London retail to be car-free as proposed will be likely to put affected retailers at a significant disadvantage to existing retailers, as well as shopping centres with large car parks and retailers in other Inner London and Outer London locations (particularly for bulky goods retailers and large supermarkets, whereby it is not possible for the ‘weekly family shop’ or a large item to be transported by walking, cycling or public transport).

Maintaining a retail strategy that focuses development in highly accessible town centre locations, whereby land is at a premium, effectively minimises car usage, and so the imposition of zero car parking for retail in these areas is considered unnecessary and unduly inflexible. As well as adversely affecting retail development in the CAZ and PTAL 5-6 locations, the proposed policy could have the negative impact of increasing car usage, by promoting travel by car over longer distances to less accessible retail locations.

Change Sought - The requirement under draft Policy T6.3 and Table 10.5 that retail development in in the CAZ and areas with PTAL 5-6 provide ‘zero parking’ is considered to be unnecessary and unduly restrictive and could severely compromise new retail development in these areas. In response it is requested that adequate flexibility be provided to deliver car-parking within in the CAZ and areas with PTAL 5-6 areas by amending Table 10.3 to refer to a maximum parking ratio of Up to 1 space per 75 sqm gross internal area (GIA) to match that identified for the rest of Inner London.

User: Lidl UK GmbH

Policy T6.3 sets out a series of several objectives for retail-related parking. Lidl's response to these is as follows:

- Lidl does not consider that a flat-rate maximum standard for parking provision for retail development is appropriate, reasonable or justified in the context of the London Plan. As noted below, it is wholly unrealistic to apply one standard to all retail development (in whatever Use Class in Class A).
- Lidl understands why the starting point for the consideration of some types of Class A retail development should be the use of existing public car parking in town centres and other locations. However, this can (A) only ever be a starting point for detailed assessment in a development management context, and (B) ignores the obvious nuances between particular types of retail use, particularly the differences between Class A1 food/grocery uses and other Class A1 and A2/3/4/5 uses.
- Lidl supports reasonable opportunities to make the best use of shared car parking. It accepts that there may be salient opportunities to do so, but each case should be reviewed on its individual merits.
- The comment at Part (D) that *"If on-site parking is justified it should be publicly-available"* is unclear and confusing. By way of example, a foodstore within or on the edge of a town centre is likely to require on-site parking. That car park is clearly accessible to the general public although, for obvious and reasonable reasons, it is to be expected that visitors to the car park will use the store and also, possibly, other parts of the town centre. It would be unreasonable for users of the store's car park to not visit the adjacent/associated store.

User: Lidl UK GmbH

First, Policy T6.3 and Table 10.5 need to be much clearer over which types of retail development the proposed policy applied to. Do they apply to just Class A1 shops or wider Classes A2/3/4/5?

Second, if (for reasons we disagree with below), the Plan contains maximum parking standards for Class A1 retail land uses, then the proposed approach in Table 10.5 is unsound, unreasonable and should be replaced with a more appropriate policy. Whilst maximum standards are contained in the existing adopted Plan, the proposed new standards are significantly different and a review of the published evidence base on draft London Plan web-site has not uncovered any material relating to retail land use parking.

Third, it is completely inappropriate for the Plan to try and propose a one size fits all for parking standards for certain types of Class A1 retail development. Such an approach does not appear to be supported any evidence base documents and/or any other research. In setting just one standard for all retail land uses, the draft Plan fails to acknowledge that there are significant differences between how shoppers use food and non-food retail stores and also other Class A retail uses. In particular, whilst it is common for comparison goods stores selling non-bulky goods to rely on general public car parks which can be located in different parts of a town centre, larger food stores, particularly those who serve main food shopping needs (either in part or as a whole), require easy and adjacent car parking provision to allow customers to transfer purchases to their cars. Public (surface level and multi-storey) car parks cannot generally serve this purpose and it is necessary for larger foodstores to propose dedicated immediately adjacent car parking areas.

The size of the store is therefore directly related to the size of car parking area needed. This is quite rightly acknowledged in Chapter 6 of the adopted Plan and Lidl considers that, if maximum standards are to continue in the new Plan:

- The parking ratio for larger foodstores should be higher – i.e. more spaces per square metre; and
- There should be a separate ratio for foodstores as opposed to non-food stores and other types of Class A retail floorspace.

Lidl’s experience of operating foodstore in London is that its car parks are very well used, which is evidence of demand for parking and the requirement to provide car parking. Removing car parking from similar new stores will not solve the perceived problem and instead the proposed parking standards will have a negative impact upon the quality of access to day to day shopping facilities.

Fourth, Lidl considers that imposing just one specific flat-rate maximum standard in each of the three tiers of area across the whole of London will not provide the best outcome for ensuring that appropriate levels of parking provision are provided for individual development proposals. Whilst it may well be the case that more central areas of London with good access via a choice of means of transport do not need to provide any parking provision for certain retail land uses, the decision to treat all ‘inner London’ and ‘outer London opportunity areas’ as automatically falling within the same category is not justified by any robust evidence and fails to acknowledge that specific locations are likely to have their own individual characteristics. The same comment applies to the decision to treat all ‘rest of outer London’ areas as falling into the same category.

Without reasonable levels of car parking associated with foodstores in a number of outer London areas, it will be impossible for grocery retailers such as Lidl to operate stores, which in turn will have a detrimental impact upon retail investment across London.

There is also a need for parking for a range users, including the disabled, elderly and parents with children. The proposed parking levels would have a severe impact upon the ability to provide parking for these groups and could isolate and disadvantage more vulnerable users.

In light of the above, the contents of Table 10.5 and Policy T6.3 of the draft Plan consultation document are not sound and are not justified by the available evidence. Lidl is firmly of the view that the content of T6.3 should be replaced with the following:

- Part A should be deleted and replaced with a policy which requires an appropriate level of on-site parking provision based upon the characteristics of the proposed development and the characteristics of the area in which proposed development is located. Table 10.5 should be deleted.
- Part B should be revised to make it clear that whilst the starting point for the need for parking provision should be existing provision, the reliance on existing provision will depend upon a number of factors including:
    - The nature of the proposed retail use
    - The level of existing provision
    - The type of existing provision
    - The location of existing provision
    - The accessibility of the area in terms of the choice of means of transport
- Lidl considers that whilst the sharing of car parking provision is a laudable aim, it is likely to be unworkable in most instances and therefore Part C should be deleted. In particular, “working hours” and the demand for retail parking throughout the day are likely to substantially overlap.
- Part D requires revision in order that it becomes clearer and acknowledges that, if on-site parking is justified, then it should primarily relate to the use proposed with opportunities to be explored in relation to how parking provision can benefit nearby town centre areas.

User:	London Borough of Ealing

Retail Parking
(T6.3)

The Council supports and welcomes the changes in Table 10.5.

The level of electric vehicle charge-point provision required needs to be clearly clarified for this type of development.

User:	Sustrans

We welcome the approach to assessing existing parking provision for retail development. Assessments of similar existing public provision should take account of the charging or timing regime of nearby retail centres in order to avoid facilitating generous parking standards. We also support the approach to optimising the use of existing parking arrangements to make most efficient use of land. As Transport for London's Analysis of Cycling potential demonstrates, "almost half of all potentially cyclable trips are made for shopping and leisure purposes." 8

8 Transport for London (2017) Analysis of Cycling Potential 2016, p. 17

User:	Sustrans
We welcome the explanatory paragraph demonstrating the nature short, switchable retail trips that could be walked or cycled and the corresponding need to reduce car parking provision, support Healthy Streets and liveable neighbourhoods.	

User:	Hornsey & Wood Green Labour Party

The presumption should be not to provide parking for retail units and there should be restrictions on out of town retail parks.

User:	Mr Sydney Charles

Where parking is justified the spaces should have access to electric charging facilities, supplied by renewable sources.

User: Federation of Small Businesses

Local businesses are at the heart of a community and play a vital role ensuring that the community continues to thrive. The provision of accessible parking, within a sustainable transport plan, is integral to the success of local shops and businesses, especially away from central London and in the outer Boroughs. It is the first experience that consumers travelling by car have when they arrive, and the last that they have when they leave. FSB are therefore keen for borough parking policies to actively encourage visitors whilst recognising public transport, cycling and other means of travel as well as meeting the needs of local small businesses.

In response to an FSB Freedom of Information request to ascertain how much Business Parking Permits have increased across London Boroughs since 2006 – the average single vehicle increase across the boroughs is a staggering **81 per cent over 10 years** – well above the rate of inflation for that period.

Recent FSB data shows that almost half (51 per cent) of FSB London members say that parking costs have a significant impact on the success of their businesses.

The value of local High Streets to local communities must be recognised and Councils should alter business parking policies to support local small businesses.

Parking provided to support high street businesses should retain a good balance of short- and long-stay parking to ensure that sufficient parking is available for customers.

Consider allowing use of residential parking spaces by customers of local shops to promote local economic growth (during periods when they are not being used by residents).

User: London Borough of Camden

Camden welcomes the overall ambition to reduce the provision for car parking while ensuring that those with essential need to drive, particularly disabled people, can have access to a car. We welcome the support for boroughs wishing to adopt borough-wide or other area-based car free policies. We also welcome the requirement not only to be car-free in high PTAL areas, but also within 800m of Town Centres.

However, there is some confusion and a lack of clarity regarding the different criteria used to establish maximum car parking levels both within and across different uses. PTAL, CAZ, and inner and outer London are all factors used to determine parking standards, but they are applied inconsistently and the reason for particular standards is not explained and unclear. The approach in the Plan should therefore be made clear and amended to ensure consistency. We also request clarification on the rationale for the maximum number of spaces attributed to each use and the variations between them.

For example, residential parking standards for PTAL 4 in inner London require car-free, while PTAL 4 in Outer London allows up to 0.5 spaces per unit. The maximum level for PTAL 3 also differs for inner and outer London (Table 10.3). It is not clear why inner and outer London are differentiated in this way if PTAL (4) is used as the criterion Meanwhile all hotels and leisure uses, in both inner and outer London (Policy 6.4) in PTAL 4 are car-free.

Similarly, Policy 6.3, retail parking (Table 10.5), allows for parking at all locations in inner London below PTAL 5. This means that parking could be provided in a retail development in inner London PTAL 4, even though residential parking in this category is car-free. The standard for this class use also differentiates between inner and outer London, where the parking standard for inner London (below PTAL 5) is on a par with Outer London, regardless of PTAL.

Policy T6.1, residential parking, criterion D states that, for areas outside the Central Activities Zone (CAZ), car clubs may be provided in lieu of parking. This suggests that parking could be provided outside the CAZ, even though many of these areas, particularly in inner London, may have a PTAL of 4-6, or be close to a Town Centre, and should therefore be car-free. This is inconsistent with the provision in Table 10.3.

We would recommend for consistency that, as a minimum, all developments in PTAL 4, regardless of use class, should be car-free. In addition, the standard for PTAL 3 should apply equally to both inner/outer London locations. In addition, criterion D in Policy T6.1 (residential parking and car clubs), should be removed as it is not necessary. Alternatively it should be amended to provide a generic statement to say, for example, that where parking is implemented in line with the standards in the Plan, they should also give consideration to car clubs.

On this basis, we agree that car clubs should be provided to help encourage people to give up personal vehicles, and that these should replace, not be in addition to, agreed parking. We suggest that the London Plan set a standard for car clubs to replace parking at a ratio of a minimum of 1 car club space for every 6 private parking spaces. This is based on the research which demonstrates that a car club removes from 6 to 20 cars from the road.

Maximum parking standards have not been provided for some use classes, including B2-B8 (General industrial, storage or distribution), C2 (Hospitals, Care homes, secure accommodation), D1 (Various), and train stations. Also there is a lack of clarity on requirements for motorcycle parking.

Camden supports the view that disabled parking should be provided for essential users as outlined in Policies T6.1 and T6.5. Provision of disabled bays on-site in car free developments could result in abuse of the available spaces if no disabled users occupy the premises. Camden would therefore recommend that in the first instance all essential parking should be provided on-street to ensure that the highway authority can manage and enforce them, and not lead to an increase in parking provision for other users, in line with the draft Mayor's Transport Strategy.

With regard to Policy T6.2 criterion D, for office car parking to secure a commitment to reduce car parking over time through the Travel Plan process, we suggest that this could be enhanced further by encouraging boroughs to consider the introduction of a Work Place Parking Levy for managing parking demand from commuting.

Policy T6.4 Hotel and leisure uses parking

User:	London Borough of Hammersmith and Fulham

(E) A Car Park Design and Management Plan should be submitted alongside all applications which include car parking provision

The policy can be made more ambitious for sites in areas of poor air quality by further encouraging the uptake of Ultra Low Emission Vehicles

The insertion of the following policy point E

A Car Park Design and Management Plan should be submitted alongside all applications which include car parking provision *indicating how it will incentivise e.g. fiscally by means of differentiated parking fees and prioritise any vehicle parking provision for Ultra Low Emission vehicles on the site in areas of poor air quality.*

User:	London Forum of Amenity and Civic Societies

Policy T6.4: Hotel and leisure uses

London Forum **supports** these standards as well as the requirements for charging points.

User: Royal Borough of Kensington and Chelsea

10.10 Policy T6.4 Hotel and leisure uses parking

The Council supports Policy T6.4. The requirement that on site provision be limited to operational needs, disabled persons parking and parking required for taxis, coach deliveries and servicing is consistent with our local plan policies. The requirement that associated electric charging infrastructure be provided is welcome. The Council would support the addition of a further part of Policy T6.4. The wording could be as follows:

"A Car Park Design and Management Plan should be submitted alongside all applications which include car parking provision indicating how it will incentivise e.g. fiscally by means of differentiated parking fees and prioritise any vehicle parking provision for Ultra Low Emission vehicles on the site."

User: Motorcycle Industry Association

• Recognition that a 25% modal shift among commuters from car to PTW use would significantly lower or even eliminate congestion (see point 18 below). This shift would require provision for secure motorcycle and scooter parking in central London to be expanded by 205,000 spaces.

2. The current Draft New London Plan refers to PTWs only in the context of motorcycle parking (p.422), and otherwise omits them entirely. The emphasis placed in the Draft New London Plan, and in the Mayor's Transport Strategy, on rebalancing London's transport system from car use towards walking, cycling and public transport, is admirable but, again, erases or overlooks PTW use.

9. ePTWs have the advantage of being able to charge via any 3-pin domestic outlet. Increasingly, PTWs are supplied with 'cartridge' style batteries that can be swapped at home or work, which is ideal for those without off street parking or those who live in flats (whilst also increasing the security of the vehicle). This offers significant benefit as charging infrastructure is not a pre-requisite.

PARKING

28. We note the Draft New London Plan's specific mention of motorcycling on p.422 regarding parking provision: "Motorcycle parking will be evaluated on a case-by-case basis. Where provided, each motorcycle parking space should count towards the maximum for car parking spaces at all land uses."

29. We would further note that there is an urgent need for additional on-street secure motorcycle and scooter parking in central urban areas.

30. Points 18-20 above outline the improvements to congestion which could be generated by a modal shift from car to PTW use among commuters. Any such shift – ideally to a situation where 25% of vehicles used to commute into London are PTWs – would require a proportionate increase in the number of parking spaces available for PTWs. We estimate the number of extra parking spaces required to be around 205,000. Building these extra spaces would incur less cost and disruption than the building of new train or tube infrastructure to cope with increased numbers of commuters.

31. We would further suggest that, where parking provision is made for ePTWs, this should be targeted at transport hubs such as stations and airports (as recommended in the IHE guidelines on motorcycle infrastructure)xv.

User:	Confederation of Passenger Transport

Entirely sensible though this is, CPT would urge that it is strengthened by making it a specific requirement of planning for any development. We would specifically recommend that the nominated developments which are likely to include group visits have a statutory requirement to cater for coaches and provide facilities in line with the size of the building. This should extend beyond the view of the developer and be included as part of the appraisal of the planning authority who should consider the needs of users and be held accountable for the decisions.

User: London Borough of Islington

Draft London Plan Policy

Policy T6.4 – Hotel and leisure uses parking

Islington Response

Parking, except for disabled spaces and operational parking, should be entirely precluded for hotel developments. Hotels attract significant trip generation and therefore parking is likely to increase congestion. The location of hotels is restricted to the most accessible areas in policy E10, so it is unlikely that hotels will be permitted in areas with poor public transport access, hence there is no need for parking.

User:	City of London Corporation

The City Corporation notes the approach to hotel parking in the CAZ (paragraph A) which limits parking to operational needs, disabled parking, taxis/coaches and necessary servicing vehicles. The Corporation requests that these standards be applied flexibly recognising, for example, that within the City of London, the adopted Local Plan does not permit on-site coach parking for hotels.

User:	London Borough of Barnet

These policies stipulate: new housing and office developments that are in areas well connected by public transport are expected to be car-free, and that Outer London maximum parking standards are set for offices and retail developments (numbers of spaces based on quantum of floorspace). The definition of well-connected areas includes Major Town Centres (i.e. Edgware) and all areas with a PTAL score of 5-6 with the level of parking required determined by the location of the development and its PTAL score. Barnet currently accepts London Plan standards on non-residential developments. As we move forwards with our new Local Plan we will examine the impact of proposed new residential and non-residential parking standards in the DLP and justify a policy framework that better responds to local circumstances.

User:	Wheels for Wellbeing

Whilst we welcome plans for all residential car parking spaces to provide infrastructure for electric or Ultra-Low Emission Vehicles (including charging points), an equivalent policy must also be developed to encourage and support the use of e-cycles. Furthermore, we oppose provision of charging points which result in trailing leads and/or which are positioned on the footway, as these create hazards for disabled people.

User:	London Borough of Brent
The Council supports this policy.	

User:	London Borough of Bromley

The policy is noted. Local Plan Draft Policy 30 states that, with the exception of residential parking standards, all other parking standards must be met as per London Plan requirements.

User:	London Borough of Tower Hamlets
Support and is unchanged from 2016 plan.	

User:	Royal Borough of Kingston

Support. RBK recognises the flexibility of this policy, which will allow locally specific approaches to be developed - something that RBK considers could usefully be applied with other parking standards.

User: Westminster City Council

Whilst the Mayor's ambitions of reducing reliance on cars is understood, proposed parking standards in tables 10.3 – 10.5 provide an overly simplistic approach that fails to take any account of local context, or allow boroughs any scope to do so. It also fails to address the main causes of congestion in central London, recognise existing low levels of car use in high PTAL areas, or acknowledge other factors that influence car ownership such as income or size of household.

Requiring that new developments do not provide any off-street car parking provision on-site does not necessarily result in developments being "car free", and can result in increased demand for on-street parking. However, policy as drafted does not address on-street parking demand. Given the pressures on kerb space in Westminster there is a pressing need to take a holistic view of parking policy; the simplistic approach taken in the DRLP militates against this objective.

The Mayors Transport Strategy identifies congestion as a result of increased private hire vehicles and servicing/ freight as the main issue in central London (page 71), rather than residents' car parking. Parts of London such as Westminster face unprecedented pressure on kerb space from multiple uses. It is likely that insisting most new development provide no dedicated off–street parking will increase on-street parking stress, leading to further congestion, road safety issues, and business servicing difficulties. It also fails to recognise that across much of London, it is not just disabled person's that have mobility issues that make them more reliant on car use, but also families with small children. The policy therefore has implications for protected equalities groups.

Reference to blue badge holders in criterion D does not reflect practice in all boroughs, so the policy should instead simply refer to disabled persons parking to be more universal.

It is noted that paragraph 10.6.3 states car club spaces should be included within maximum car parking provision and not in addition to it. When read alongside table 10.3, this equates to an outright ban on car clubs in new developments in most of inner London, despite such schemes being recognised as reducing car ownership dependency.

Finally, the assertion in paragraph 10.6.7 that motorcycle parking should count towards maximum car parking spaces fails to recognise the differing space requirements and types of users this mode of transport typically has to car use.

User:	London Borough of Hounslow

LB Hounslow agrees with the case-by-case analysis of parking need in areas with low PTAL as the provision of public transport varies across the Borough. There is concern, however regarding how the requirements for coach parking are determined? From experience this is usually an area that is under-planned, having more concrete guidelines from the Mayor would be beneficial.

User:	London Borough of Richmond Upon Thames

General support for Policy T6.4, although it is considered to be inflexible with regard to

PTAL 4 areas.

User: LEVC

Policy T6.4 Hotel and leisure uses parking

- LEVC agrees with the provisions set out for taxis in this Policy, particularly that operational parking must provide infrastructure for electric vehicles, including active charging points for all taxi spaces.
- However, LEVC would urge the Mayor to urgently review and improve his definition of active charging points to assist developers and installers.

User:	British Property Federation

We are encouraged that the Mayor has included provisions for disabled persons parking, taxis, coaches, deliveries and servicing. This highlights that the Mayor is committed to providing parking for transport services and those that need easy mobility. Also, we are pleased that the plans specify that “all operational parking must provide infrastructure for electric or other Ultra-Low Emission vehicles”, this underlines the Mayor’s ambition to support innovation and environmentally friendly transport. However, before minimal parking is adopted, adequate transport infrastructure must be in place.

User:	London Travel Watch

London TravelWatch recognises that parking management is a necessary tool to manage available road space, and in those locations that are well served by public transport can be used to manage demand for private vehicle travel. We support these policies.

Car-free and ‘car-lite’ policies will allow development at densities that would not otherwise be possible in locations that are well connected to public transport. These policies are supported. They could also reduce the impact of traffic on the local road network. However, restricting car parking within the curtilage of a large-scale development may lead to parking pressure on the public highway if there are insufficient on-street parking controls in place. The text of this policy should refer to the need for on-street controls and controlled parking zones associated with car-free development.

User:	Bishopsgate Goods Yard Regeneration Limited

Our client welcomes the commitment to ensure that new developments are provided with suitable parking provision and the associated infrastructure for electric or Ultra-Low Emission vehicles. However, the policy should ensure that an appropriate level of parking, including blue badge, comes forward for each development.

User: London Borough of Ealing

Hotel and Leisure Uses Parking (T6.4)

More guidance is required for car parking standards for various uses in areas of lower PTAL, particularly for Hotels and Class D uses. Both the current and proposed standards are open to too much interpretation.

The level of electric vehicle charge-point provision required needs to be clearly clarified for this type of development.

User:	Hornsey & Wood Green Labour Party
We agree with these proposals.	

User:	Mr Sydney Charles

Where parking is justified the spaces should have access to electric charging facilities, supplied by renewable sources.

User: Unknown

Policy T6.4: Hotel and Leisure Uses Parking/ Policy T6.5: Non-residential disabled persons parking

Our client is encouraged that the Mayor has included provision for disabled persons parking, taxis, coaches, deliveries and servicing. The policy specifies that “all operational parking must provide infrastructure for electric or other Ultra-Low Emission vehicles”, which they support; however, they would request this provision is included within the viability of developments as the infrastructure costs associated can be significant. Before minimal parking is adopted, adequate transport infrastructure must be in place.

User: London Borough of Camden

Camden welcomes the overall ambition to reduce the provision for car parking while ensuring that those with essential need to drive, particularly disabled people, can have access to a car. We welcome the support for boroughs wishing to adopt borough-wide or other area-based car free policies. We also welcome the requirement not only to be car-free in high PTAL areas, but also within 800m of Town Centres.

However, there is some confusion and a lack of clarity regarding the different criteria used to establish maximum car parking levels both within and across different uses. PTAL, CAZ, and inner and outer London are all factors used to determine parking standards, but they are applied inconsistently and the reason for particular standards is not explained and unclear. The approach in the Plan should therefore be made clear and amended to ensure consistency. We also request clarification on the rationale for the maximum number of spaces attributed to each use and the variations between them.

For example, residential parking standards for PTAL 4 in inner London require car-free, while PTAL 4 in Outer London allows up to 0.5 spaces per unit. The maximum level for PTAL 3 also differs for inner and outer London (Table 10.3). It is not clear why inner and outer London are differentiated in this way if PTAL (4) is used as the criterion Meanwhile all hotels and leisure uses, in both inner and outer London (Policy 6.4) in PTAL 4 are car-free.

Similarly, Policy 6.3, retail parking (Table 10.5), allows for parking at all locations in inner London below PTAL 5. This means that parking could be provided in a retail development in inner London PTAL 4, even though residential parking in this category is car-free. The standard for this class use also differentiates between inner and outer London, where the parking standard for inner London (below PTAL 5) is on a par with Outer London, regardless of PTAL.

Policy T6.1, residential parking, criterion D states that, for areas outside the Central Activities Zone (CAZ), car clubs may be provided in lieu of parking. This suggests that parking could be provided outside the CAZ, even though many of these areas, particularly in inner London, may have a PTAL of 4-6, or be close to a Town Centre, and should therefore be car-free. This is inconsistent with the provision in Table 10.3.

We would recommend for consistency that, as a minimum, all developments in PTAL 4, regardless of use class, should be car-free. In addition, the standard for PTAL 3 should apply equally to both inner/outer London locations. In addition, criterion D in Policy T6.1 (residential parking and car clubs), should be removed as it is not necessary. Alternatively it should be amended to provide a generic statement to say, for example, that where parking is implemented in line with the standards in the Plan, they should also give consideration to car clubs.

On this basis, we agree that car clubs should be provided to help encourage people to give up personal vehicles, and that these should replace, not be in addition to, agreed parking. We suggest that the London Plan set a standard for car clubs to replace parking at a ratio of a minimum of 1 car club space for every 6 private parking spaces. This is based on the research which demonstrates that a car club removes from 6 to 20 cars from the road.

Maximum parking standards have not been provided for some use classes, including B2-B8 (General industrial, storage or distribution), C2 (Hospitals, Care homes, secure accommodation), D1 (Various), and train stations. Also there is a lack of clarity on requirements for motorcycle parking.

Camden supports the view that disabled parking should be provided for essential users as outlined in Policies T6.1 and T6.5. Provision of disabled bays on-site in car free developments could result in abuse of the available spaces if no disabled users occupy the premises. Camden would therefore recommend that in the first instance all essential parking should be provided on-street to ensure that the highway authority can manage and enforce them, and not lead to an increase in parking provision for other users, in line with the draft Mayor's Transport Strategy.

With regard to Policy T6.2 criterion D, for office car parking to secure a commitment to reduce car parking over time through the Travel Plan process, we suggest that this could be enhanced further by encouraging boroughs to consider the introduction of a Work Place Parking Levy for managing parking demand from commuting.

Policy T6.5 Non-residential disabled persons parking

User:	Arup

- T6.5 – Non-residential disabled persons parking
  For car free schemes, some Blue Badge bays still to be provided – clarity is required as to what ‘some’ means.

User:	Sport England
There is a typo – it should refer to Sport England (not Sports England). Also the title of the relevant document should be included.	

User:	The Access Association

T6.5 Non-residential disabled persons parking

Welcome the recognition of need. Spaces can all to often be provided and then abused so encouragement of policing such spaces should be encouraged.

User:	London Forum of Amenity and Civic Societies
Table 10.6: There is no clear justification for the fairly minor differences in standards here.	

User:	Withernay Projects

In addition to a minimum of one off or on-street accessible car parking bay, there should be a minimum of one on-street setting-down bay, that is permanently designated for this purpose and suitably designed for use with vehicle ramps at side (ie with kerbs) or rear, and with dropped kerbs.

User: David Bonnett Associates

DBA general comment. Policies T6.2 Office parking (H), T6.3 Retail parking (E), T6.4 Hotel and leisure uses parking (D) all specify that ‘Disabled persons parking should be provided as set out in Policy T6.5 Non-residential disabled persons parking’.

Car-free developments. ‘Some’ Blue Badge Bay parking is subjective - no guidance provided re: #s unless reference to ‘at least one’ of policy ‘A’. Guidance / clarification should be provided on numbers and how should it be enforced. Who is obliged to provide this where the red line of a site does not include any street space? What is acceptable for developments to provide /not provide depending on their size?

Many City Centre developments have no car parking at all as the PTAL score as well as the location of the development makes it possible for all people to travel to the building (if it is their place of work) without using their car. If it is a visitor then again similar rules might apply. If every development regardless of no general car parking provision has to have at least one on street or off street car parking space then who is to manage and police it? DBA´s view is that this provision is not a practical means to ensure that a disabled person can rely upon a parking space close to the building they wish to visit. DBA suggest that the LA should include within its highways and parking arrangements a suitably located blue badge (or Red Badge if its the City or Westminster) space(s) as part of a planning condition for any development if the development itself cannot accommodate it on site. This might then allow a measure of facility that is accessible without relying upon a building owner to provide the space when new and then fill it with builders plant or the CEO’s car later.

User:	Mr Geoffrey Lean

These provisions for disabled persons are to be welcomed, but they need to be enforced. There should also be adequate disabled parking in residential areas for visitors, especially in large developments.

User: Royal Borough of Kensington and Chelsea

10.11 Policy T6.5 Non-residential disabled persons parking

Save for Part A, we support this policy.

Part A states that, "all non-residential elements of a development should provide at least one on or off street disabled persons parking bay". This requirement is not qualified. Given that the vast majority of development sites in Inner and Central London do not have the potential to provide off street car parking, the parking spaces called for by the policy would for the most part have to be provided on street.

Most developments are of very small scale and do not generate the need for an additional disabled persons parking bay. Rather they contribute to the cumulative demand for disabled persons' parking bays in their vicinity. We agree this impact should be duly mitigated and that disabled persons should be afforded proper access to new developments from appropriately located disabled persons parking bays.

Part A's proposed wording would be more appropriate for development schemes of a scale that makes them referable to the Mayor. The wording of Part A should be qualified accordingly or otherwise refined.

The non-residential disabled persons parking standards set out in Table 10.6 are acceptable. Very few non-residential car parks are likely to be delivered within the borough over the lifetime of the plan so these standards will rarely apply.

User: Get Living London

GLL suggests an amendment to the draft policy wording given complexities around certain sites of meeting this policy requirement

Specific Amendment Sought

GLL proposes the following amendment to draft Policy T6.5:

"A All non-residential elements of a development should seek to provide at least on on or off-street disabled persons parking bay"

User:	City of London Corporation
The City Corporation welcomes the provisions and guidance for non-residential disabled persons parking	

User:	London Borough of Barnet

These policies stipulate: new housing and office developments that are in areas well connected by public transport are expected to be car-free, and that Outer London maximum parking standards are set for offices and retail developments (numbers of spaces based on quantum of floorspace). The definition of well-connected areas includes Major Town Centres (i.e. Edgware) and all areas with a PTAL score of 5-6 with the level of parking required determined by the location of the development and its PTAL score. Barnet currently accepts London Plan standards on non-residential developments. As we move forwards with our new Local Plan we will examine the impact of proposed new residential and non-residential parking standards in the DLP and justify a policy framework that better responds to local circumstances.

User:	Wheels for Wellbeing
10.6 With regards to car parking for Blue Badge holders, thought should be given to the possibility of the co-location of disabled car and inclusive cycle parking bays. Similar considerations should also be made for the co-location of family car and cycle/cargo-cycle parking bays.	

User:	London Borough of Brent
The Council supports this policy.	

User:	London Borough of Bromley

The policy is noted. Local Plan Draft Policy 30 states that, with the exception of residential parking standards, all other parking standards must be met as per London Plan requirements.

User:	London Borough of Tower Hamlets

Support although more clarity is needed on minimum level of provision where no general car parking is proposed.

User:	Royal Borough of Kingston

Support. RBK recognises the flexibility of this policy, which will allow locally specific approaches to be developed - something that RBK considers could usefully be applied with other parking standards.

User:	Royal Borough of Kingston
Support, except the reference to the building standard given that this can change over the plan period.	

User:	Westminster City Council

Criterion A requirements for at least one disabled persons parking bay lacks any proportionality to the scale of development, or local context. It is unlikely to be deliverable on many proposals in Central London.

User:	London Borough of Hounslow

LB Hounslow is concerned with the statement in the policy, that for any car free development “some blue badge parking should be provided even if no general parking is provided”. Clarification is required on whether this includes existing on-street disabled bays count, or take into account other permit bays where blue badge holders are able to park.

User:	London Borough of Richmond Upon Thames
General support for Policy T6.5	

User:	London Borough of Harrow
The Council supports this policy.	

User:	Aspire

Non-Residential Parking
Aspire very much welcomes the requirements set out in policy T6.5 for disabled parking in non-residential developments. It might also be useful to clarify what would be expected in the case of mixed use developments.

User:	Inclusion London

Policy T6.1 Residential parking

Policy T6.3 Retail parking

Policy T6.5 Non-residential disabled persons parking

Recommendation: Disabled people call for more blue badge parking bays to be allocated and for use of these by blue badge holders only to be enforced.

User:	Just Space
T6.5 Non-Residential Disabled Persons Parking: This is not precise and emphatic enough to ensure that London becomes fully accessible and user friendly to all as soon as possible. The proposed parking standards for the provision of disabled persons' parking spaces should be doubled to cater for presently unrecognised demand and the growing ageing population living with impaired mobility.	

User:	London Borough of Bexley

More emphasis has been placed on the approach set out in **Part A** of **Policy T6.5 Non-residential disabled persons parking**, which now features as a policy in its own right. In reality, it is hard to secure on-street public parking spaces in perpetuity for the use of a private development. Furthermore, the process of implementing parking spaces on the public highway is subject to consultation and requires changes to Traffic Management Orders, and as the highway is not under the control of the development, public on-street parking could be altered or removed while the development continues to operate. The wording of this policy should be changed to include '*where possible*.'

There is a need to clarify what is meant by the term 'enlarged bay' in **Part E** of **Policy T6.5**. Also, is there any point in the creation of larger bays if all bays capable of being converted into disabled parking in the future cannot be used as non-disabled parking in the meantime, as outlined in **Paragraph10.6.10**?

User:	Federation of Small Businesses
Dedicated disabled parking should be provided. Loading and unloading bays should be provided separately from disabled spaces.	

User:	British Property Federation

We are encouraged that the Mayor has included provisions for disabled persons parking, taxis, coaches, deliveries and servicing. This highlights that the Mayor is committed to providing parking for transport services and those that need easy mobility. Also, we are pleased that the plans specify that “all operational parking must provide infrastructure for electric or other Ultra-Low Emission vehicles”, this underlines the Mayor’s ambition to support innovation and environmentally friendly transport. However, before minimal parking is adopted, adequate transport infrastructure must be in place

User:	London Travel Watch

We support the provision of disabled car parking spaces.

However, this policy does not provide for this in car-free developments because it relies on providing a percentage of total car parking for disabled users. 5% of nothing is nothing! This policy needs reconsideration.

User:	Bishopsgate Goods Yard Regeneration Limited

Our client welcomes the commitment to ensure that new developments are provided with suitable parking provision and the associated infrastructure for electric or Ultra-Low Emission vehicles. However, the policy should ensure that an appropriate level of parking, including blue badge, comes forward for each development.

User:	London Borough of Ealing

Non-Residential Disabled Persons Parking (T6.5)

The Council supports this policy.

User:	Hornsey & Wood Green Labour Party
We agree with these proposals.	

User: London Borough of Camden

Camden welcomes the overall ambition to reduce the provision for car parking while ensuring that those with essential need to drive, particularly disabled people, can have access to a car. We welcome the support for boroughs wishing to adopt borough-wide or other area-based car free policies. We also welcome the requirement not only to be car-free in high PTAL areas, but also within 800m of Town Centres.

However, there is some confusion and a lack of clarity regarding the different criteria used to establish maximum car parking levels both within and across different uses. PTAL, CAZ, and inner and outer London are all factors used to determine parking standards, but they are applied inconsistently and the reason for particular standards is not explained and unclear. The approach in the Plan should therefore be made clear and amended to ensure consistency. We also request clarification on the rationale for the maximum number of spaces attributed to each use and the variations between them.

For example, residential parking standards for PTAL 4 in inner London require car-free, while PTAL 4 in Outer London allows up to 0.5 spaces per unit. The maximum level for PTAL 3 also differs for inner and outer London (Table 10.3). It is not clear why inner and outer London are differentiated in this way if PTAL (4) is used as the criterion Meanwhile all hotels and leisure uses, in both inner and outer London (Policy 6.4) in PTAL 4 are car-free.

Similarly, Policy 6.3, retail parking (Table 10.5), allows for parking at all locations in inner London below PTAL 5. This means that parking could be provided in a retail development in inner London PTAL 4, even though residential parking in this category is car-free. The standard for this class use also differentiates between inner and outer London, where the parking standard for inner London (below PTAL 5) is on a par with Outer London, regardless of PTAL.

Policy T6.1, residential parking, criterion D states that, for areas outside the Central Activities Zone (CAZ), car clubs may be provided in lieu of parking. This suggests that parking could be provided outside the CAZ, even though many of these areas, particularly in inner London, may have a PTAL of 4-6, or be close to a Town Centre, and should therefore be car-free. This is inconsistent with the provision in Table 10.3.

We would recommend for consistency that, as a minimum, all developments in PTAL 4, regardless of use class, should be car-free. In addition, the standard for PTAL 3 should apply equally to both inner/outer London locations. In addition, criterion D in Policy T6.1 (residential parking and car clubs), should be removed as it is not necessary. Alternatively it should be amended to provide a generic statement to say, for example, that where parking is implemented in line with the standards in the Plan, they should also give consideration to car clubs.

On this basis, we agree that car clubs should be provided to help encourage people to give up personal vehicles, and that these should replace, not be in addition to, agreed parking. We suggest that the London Plan set a standard for car clubs to replace parking at a ratio of a minimum of 1 car club space for every 6 private parking spaces. This is based on the research which demonstrates that a car club removes from 6 to 20 cars from the road.

Maximum parking standards have not been provided for some use classes, including B2-B8 (General industrial, storage or distribution), C2 (Hospitals, Care homes, secure accommodation), D1 (Various), and train stations. Also there is a lack of clarity on requirements for motorcycle parking.

Camden supports the view that disabled parking should be provided for essential users as outlined in Policies T6.1 and T6.5. Provision of disabled bays on-site in car free developments could result in abuse of the available spaces if no disabled users occupy the premises. Camden would therefore recommend that in the first instance all essential parking should be provided on-street to ensure that the highway authority can manage and enforce them, and not lead to an increase in parking provision for other users, in line with the draft Mayor's Transport Strategy.

With regard to Policy T6.2 criterion D, for office car parking to secure a commitment to reduce car parking over time through the Travel Plan process, we suggest that this could be enhanced further by encouraging boroughs to consider the introduction of a Work Place Parking Levy for managing parking demand from commuting.

User: Barts Health NHS Trust

Policy T6.5 – Parking for People with Disabilities

The Trust supports the provision of adequate car parking for people with disabilities regardless of whether general use car parking is provided or not. The draft policy expresses a requirement for parking for people with disabilities to be provided and says that the quantum should be calculated as a percentage of the total general use car parking provision. We do not see how such a policy could be reasonably operated in circumstances (as encouraged by other draft London Plan policy) whereby a proposed development is otherwise car free.

The new London Plan should clarify the approach to the provision of car parking for people with disabilities in the event that no general use car parking is to be provided.

User: Tavistock and Portman NHS Foundation Trust

Policy T6.5 – Parking for People with Disabilities

The Trust supports the provision of adequate car parking for people with disabilities regardless of whether general use car parking is provided or not. The draft policy expresses a requirement for parking for people with disabilities to be provided and says that the quantum should be calculated as a percentage of the total general use car parking provision. We do not see how such a policy could be reasonably operated in circumstances (as encouraged by other draft London Plan policy) whereby a proposed development is otherwise car free.

The new London Plan should clarify the approach to the provision of car parking for people with disabilities in the event that no general use car parking is to be provided.

Potential options for raising the required funding

User:	London Forum of Amenity and Civic Societies
London Forum supports the actions described	

User:	Love Wimbledon BID

benefitting from uplift in land values? then don't sell off Wimbledon Police station - this is the most irrational decision!! Wimbledon property prices and land value are high - why sell off now when this could be utilised as an asset?

User: Association of Licensed Multiple Retailers

The business rates revaluation hit the eating and drinking out sector particularly hard, with increases in rateable values of around 15%, across the country. Despite some helpful measures announced by Government at Budget 2017 this has led to severe cost increases from April – and many are likely to see a ramping up of these costs as transitionary relief no longer holds back the very large increases in RVs that were seen across the sector.

Business rates are paid by all businesses operating from a property. Unfortunately, this disadvantages eating and drinking outlets that focus on great customer experience compared to other properties that are more transactional, or indeed those that do not need a property (or only minimal facilities) to operate and therefore are outside the scope of business rates.

Any devolution of business rates powers ought to include the ability to administer reliefs and/or exemptions for the hardest hit businesses. With the capital's property values so high, London's venues suffer a disproportionately high financial burden. The Chancellor of the Exchequer last year implemented a relief for pubs, in recognition of the burden of business rates on that part of the sector. This ought to be extended and increased in London, to reflect higher costs, and ought also to have more favourable, comprehensive coverage of all licensed venues.

In addition, in the absence of central Government's delivery on commitments to reform business rates, the Mayor and GLA can lead the way by examining and implementing a property tax better suited to the challenges posed by a high value property environment.

User:	London Borough of Camden
Camden welcomes any approaches that can secure additional funding for infrastructure.	

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Thames Estuary

User: Mr Simon Hunt

I think the inclusion of additional river crossings has been long debated and local views made known, especially with regard to already over-burdened road infrastructure.

Is the Mayor impervious to previous findings? Or is the Mayor "one guy" who disagrees, and who was elected to represent the views of Londoners? Are we really destined to have these previously debated and rejected plans continually resurface until they "just happen" - that's not democracy.

User:	Mrs Denise Spring

As a Bexley resident, I believe that any new development must have transport links included as part of the planning process. An extension to Cross rail which stops at several stations in Bexley Borough IS ESSENTIAL with trams from new houses to these stations. Bexley Borough is cheaper because our transport links to Central London are poor, slow (given the short distance) and already overcrowded without new developments.

User:	Allies and Morrison

We are pleased that Mayor will prioritise the exploration of a number of schemes that will encourage growth and connectivity across the river Thames including: the Silvertown tunnel, Rotherhithe and Canary Wharf river crossings, extension of the DLR across the river from Gallions Reach to Thamesmead and Overground crossing from Barking Riverside to Abbey Wood.

User:	Tate and Lyle Sugars

- The policy rightly recognises “the presence of important existing industry” and we strongly support the statement “The area has significant areas of SIL and recent evidence confirms that there is a continued demand for industrial space in the east of London. The Planning Framework should ensure industrial capacity is managed in ways that reduce overall vacancy rates and support the intensification of industrial, logistics and commercial uses so that they continue to form part of the overall mix of uses in the area.”
- There is significant demand for SIL land in this area and active industrial buyers.

User:	Tate and Lyle Sugars

- Point 2.1.49 states “The Planning Framework should also set out how to manage the opportunities for mixed-use development at Canning Town/West Ham, and Thameside West where there is or will be excellent public transport connectivity.”
- Within Thameside West there remain extremely important and economically vibrant areas of SIL. The proper and thorough protection of these areas, in the context of limited SIL release, is crucial both crucial to maintaining and creating jobs as well other objectives mentioned in the London Plan such as Wharf Consolidation. Given this we suggest the plan should possibly be amended as below. Amends in **bold**
- "The Planning Framework should also set out how to **carefully** manage **retaining important pre-existing industry** alongside the opportunities for mixed-use development at Canning Town/West Ham, and Thameside West where there is or will be excellent public transport connectivity."

User:	Tate and Lyle Sugars

2.1.46 – 5: Royal Docks Opportunity Area Framework

- We broadly support this section. The Royal Docks provides fantastic opportunities to grow businesses and jobs. As members of the Royal Docks Enterprise Zone Advisory Board we think it is essential planning policy directly supports the aim of attracting a wide range of new businesses to the area.
- The draft Royal Docks & Beckton Opportunity Area Framework issued in 2016 by the GLA caused confusion and complications in the area for pre-existing businesses, property developers and local Government. Meticulous and detailed consultation should take place before the final version to ensure the spatial planning matches the reality on the ground

User: Environment Agency

We consider that the environment is not fully represented in the text pertaining to individual Opportunity Areas, and that it would help ensure ‘good growth’ to identify both environmental risks and opportunities within the text, including the opportunities for the consideration of a strategic approach to environmental infrastructure provision. For example, we note that the Regional Flood Risk Assessment which supports the Plan, identifies for each Opportunity Area where there are actions that contribute to the delivery of the Thames Estuary 2100 Plan, and where an integrated water management study may be appropriate.

Reinforcing our above comments, we welcome that the text for Thamesmead and Abbey Wood Opportunity Area identifies water and flood risk management infrastructure is needed to support growth.

Recommendation:

Ensure the text for individual Opportunity Areas consistently acknowledges the environmental infrastructure needs of growth.

User: Regeneration X

In our response of 23rd February we included the following section:

2.1.42 Says that The Mayor (and the London Plan) will support the extension of The Elizabeth Line (Cross Rail 1) to North Kent. This is a very vague statement and we wish to see which parts of North Kent the Mayor is talking about (i.e which towns). We are also very concerned by many of the Transport Plans which are and have been brought forward: it must not be the case that longer distance commuting (eg from Kent) is provided to the detriment of shorter distance commuters (eg from outer London). It appears that the proposed new South East Train Franchise is making life worse for those in outer London Boroughs in order to make it easier to commute from longer distances: this is unacceptable and embeds inequality.

We wish to further support, and illustrate, our views here by drawing your attention to the following which we have just been made aware of: " ***£6 billion spent on Thameslink…and Greenwich line services are slower than ever in new timetable.*** *Timetables for May's Thameslink services on the Woolwich and Greenwich line have been uploaded to online planners and confirm that Thameslink services along the route will be slower than those operated by Southeastern before work begun on 'speeding up journeys'. And that's despite calling at fewer stations. Before 2015 a slow all-stopping service from Abbey Wood to London Bridge via Greenwich which stopped at all stations was timetabled at 27 minutes."* This is from http://www.fromthemurkydepths.co.uk/2018/02/25/6-billion-spent-on-thameslink-and-greenwich-line-services-are-slower-than-ever-in-new-timetable/

User:	Rosalind Readhead
I support all proposed walking and cycling bridges Rotherhithe, Nine Elms to Pimlico and would like these to be prioritised.	

User:	Rosalind Readhead

I do not support Silvertown Tunnel. We must not build new roads which induce more motor traffic use.

User: London Wildlife Trust

Thames Estuary North and South

We are concerned this makes no reference to the ecological importance of the estuary, floodplain habitats and its hinterland (for example as an international migratory route for birds and fish), some of which is of national and international ecological importance. These assets not only need to be protected but also better connected to provide the ecological resilience in the face of planned development pressures. The tidal Thames (downstream from Teddington) is a candidate Marine Conservation Zone under the Marine & Coastal Access Act 2009, and part of the estuary within Greater London is part of a Nature Improvement Area.

There should be explicit reference to integration with the emerging South East Marine Plan being developed by the Marine Management Organisation (see Policy SI14).

User:	London Wildlife Trust

Bexley Riverside OA
Similarly this area contains some of the remaining floodplain grazing meadows (UK Priority Habitats) on the south side of the Thames, with regionally important populations of water vole. The Planning Framework (Para 2.1.540 should also ensure that there is no net loss of biodiversity.

The Funding Gap

User:	London Forum of Amenity and Civic Societies

Paragraph 11.1.11 explains that the London Infrastructure Plan 2050 outlined that the total investment in London's infrastructure (as defined in the plan) required between 2016 and 2050 could reach £1.3 trillion (2014 prices, within a range of £1 trillion to £1.7 trillion). The actual number is likely to be higher given inflation and the revised population estimates underpinning this London Plan.

New estimates should be provided.

Trams Triangle/London-Gatwick-Brighton mainline

User:	Legal & General Capital

Para 2.1.68 and 2.1.69 address the strategic growth corridor, linking London to Gatwick and the south coast: ‘Trams Triangle/London-Gatwick-Brighton Mainline’, together with Figure 2.11. Para 2.1.69 acknowledges that the corridor links beyond London’s boundaries but provides no analysis or policy response to this linkage and simply points to Figure 2.15(9), which identifies the corridor of ‘Brighton Mainline’ (London-Gatwick-Brighton) as a Strategic Infrastructure Priority.

At para 2.2.4, the draft Plan points to the non-statutory strategic structure that has been put in place which it states provides the basis for co-ordinated approaches to Government. However, the Plan in essence defers collaboration on locally specific cross border matters to the exercise of the duty to co-operate between individual authorities.

In short, there is no strategic policy response to address the opportunity presented by growth in the Gatwick triangle and the contribution that the continued success of Gatwick as an employment and growth generator can be of benefit to London and co-ordinated.